



BP CANADA

OMS CP 3.4-0004 Alcohol and Drug Policy

Authority:	H&S Director	Custodian:	Health Director
Scope:	Canada Region	Issuing Dept.:	OBO Production/HSE
Issue Date:	01-Apr-2008	Last Revision Date:	23-Oct-2013
Control Status:	Controlled Document	Next Revision Date:	23-Oct-2014

TABLE OF CONTENTS

1.0	ARTICLE 1 - General Principles.....	1
1.1	Policy Statement	1
1.2	Scope and Applicability	1
1.3	Responsibilities.....	1
1.4	Administration	1
1.5	Policy Evaluation.....	2
1.6	Employee Acceptance of Terms.....	2
2.0	ARTICLE 2 - Definitions	2
3.0	ARTICLE 3 - Substances and Applicable Rules.....	5
3.1	Fitness for Duty	5
3.2	Drugs	5
3.3	Alcohol	5
3.4	Medications and Other Substances	6
3.5	Scheduled Call Situations and Unexpected Circumstances	7
4.0	ARTICLE 4 - Prevention, Assistance and Rehabilitation.....	7
4.1	Prevention.....	7
4.2	Assessment/Rehabilitation for Employees.....	7
4.3	Voluntary Disclosure	7
4.4	Removal from Work.....	7
4.5	Return to Work Conditions.....	8
4.6	Confidentiality	8
5.0	ARTICLE 5 - Procedures	8
5.1	Escort from Company Premises (Employees)	8
5.2	Possession of Alcohol or Drugs.....	9
5.3	Alcohol and Drug Testing.....	9
5.4	Impaired Driving	12
5.5	Searches.....	13
5.6	Hosting Policy	14
6.0	ARTICLE 6 - Consequences of a Policy Violation.....	14
6.1	Consequences and Investigation	14
6.2	Appropriate Discipline	14
7.0	ARTICLE 7 - Appendices.....	15
8.0	Reference Documents.....	15
9.0	Revision Log.....	16
	APPENDIX I - CONTRACTOR EXPECTATIONS	17
	APPENDIX II - ROLES AND RESPONSIBILITIES OF BP CANADA AND EMPLOYEES	20
	APPENDIX III - ALCOHOL AND DRUG TESTING PROCEDURES	24
	APPENDIX IV - SAFETY SENSITIVE MATRIX	26
	APPENDIX V - SAFETY SENSITIVE WORKSITES	27
	APPENDIX VI - SUGGESTED HOSTING PRACTICES	28
	APPENDIX VII - SEARCH PROCEDURES	30

1.0 ARTICLE 1 - General Principles

1.1 Policy Statement

BP Canada places a priority on a goal of eliminating health and safety risks associated with all business activities. BP Canada is committed to safety and productivity in all aspects of its operations on behalf of Employees, Contractors, customers, the communities in which BP Canada operates, and the public in general. BP Canada's Policy Commitment to Health, Safety, Security and Environmental Performance states:

"No accidents, no harm to people and no damage to the environment."

The inappropriate use of Alcohol, the use of Drugs, and the misuse of Medications and Non-Prescription Medications may have serious adverse effects on health, safety and job performance. This in turn can negatively impact Employees, Contractors, Contract Workers, members of the public and the environment. Therefore, appropriate measures are necessary to ensure the safe and successful conduct of our Company Business.

1.2 Scope and Applicability

This statement forms the foundation for BP Canada's Alcohol and Drug Policy for Employees (the "Policy"). This Policy will be applied to all Employees who are working for BP Canada and in all circumstances when Employees are conducting Company Business, on Scheduled Call or are driving a Company assigned vehicle. This Policy also applies to all Company Premises including SSWS. Contractors working on Company Premises or at SSWS are expected to implement their own Alcohol and Drug Policy, including contracting with third parties or MRO's for qualified Alcohol and Drug Testing services. This Policy represents BP Canada's minimum expectations, and is not intended to diminish any existing Contractor Alcohol or Drug policy or program (See Appendix I - BP Canada's Contractor Expectations).

Employees inviting a Visitor to a SSWS are required to inform the Visitor of the requirements of section 3.2, 3.3, 3.4 and 5.5 of this Policy prior to the Visitor's attendance at the SSWS and are to accompany the Visitor at the SSWS at all times while conducting Company Business. Any Visitor acting in contravention of this Policy will be denied access to or removed from Company Premises immediately.

This Policy is intended to provide for a safe and healthy working environment that minimizes any negative effects due to the use of Alcohol or Drugs by Employees, Contractors, Contract Workers, and Visitors, while respecting the confidentiality and privacy of all individuals covered by the Policy and ensuring they are treated fairly and with respect

1.3 Responsibilities

BP Canada is committed to working with its Employees and Contractors to address Alcohol and Drugs in the workplace and to provide the proper awareness, education, effective intervention and treatment. There is a shared responsibility for the successful implementation of this Policy. (Please refer to Appendix II - Roles and Responsibilities of BP Canada and its Employees).

1.4 Administration

Procedural guidelines regarding all aspects of this Policy are provided in Appendices I-VII. Any Employee questions on Policy details, interpretation, or implementation provisions should be referred to Human Resources, the Law Department, or Occupational Health. BP Canada's decision shall be final in all cases.

1.5 Policy Evaluation

To ensure this Policy continues to meet the established objectives, and remains responsive to current circumstances as well as evolving needs, the Policy and its implementation will be monitored on an on-going basis, and will be subject to formal evaluation within 3 years after implementation and on a regular basis thereafter. Accordingly, it may be amended from time to time at BP Canada's sole discretion without prior notice. Any amendments will be communicated to the individuals covered by the Policy.

1.6 Employee Acceptance of Terms

By continuing his or her employment with the Company, the Employee accepts the terms of this Policy and authorizes the Designated Collection Site, or other collection facility or MRO, to report Alcohol and/or Drug Test results to the Company or any persons with legal authority to require the disclosure of the Alcohol and/or Drug Test results.

2.0 ARTICLE 2 - Definitions

Words used in this Policy and the Appendices will have the following meaning:

- (a) **"Adulterant"** means any product, substance, chemical, or device which may be used to Tamper with an Alcohol or Drug sample.
- (b) **"Alcohol"** means any substance that may be consumed and that has an alcoholic content in excess of 0.04 per cent by volume.
- (c) **"Alcohol and Drug Test", "Alcohol and Drug Testing" "Alcohol Test" or "Drug Test"** means scientifically recognized tests which analyze an individual's urine or breath for evidence of Alcohol or Drug exposure, as the context requires (See Appendix III - Alcohol and Drug Testing Procedures).
- (d) **"BAC"** means blood alcohol concentration as determined by recognized breathalyzer tests.
- (e) **"BP Canada" or "the Company"** means BP Canada Energy Group ULC and its affiliates in Canada.
- (f) **"BP Canada Representative"** refers to the individual in authority over a particular area or shift, including team leaders, managers and others in positions of authority.
- (g) **"Company Business" or "BP Canada Work"** includes all business activities undertaken by Employees, Contractors or Contract Workers in the course of BP Canada's operations whether conducted on or off Company Premises for which an Employee, Contractor or Contract Worker is compensated.
- (h) **"Company Premises"** includes all land, property (including camps), SSWS, vehicles, offices, buildings, desks, lockers, parking areas and any other facilities that are owned, leased, operated, used or otherwise directly controlled by BP Canada.
- (i) **"Contractors"** includes any contractor, alliance partner, sole proprietor, consultant, subcontractor, or suppliers providing goods or services to BP Canada.
- (j) **"Contract Manager" or "Contract Supervisor"** means any individual working for the Contractor in a leadership or supervisory position, or position of authority over a particular area, job, or shift.
- (k) **"Contract Worker"** means the Contractor's employees, representatives, consultants, agents, servants, affiliates, or associates.

- (l) **"Dependents"** means immediate family (i.e., "spouse") and dependent children as defined under BP Canada's employee benefits policies.
- (m) **"Designated Collection Site"** means a secure collection site, as determined by BP Canada, in its sole discretion from time to time. A Designated Collection Site will work within quality control guidelines addressing:
 - i. the qualifications of personnel and specifications for materials, equipment and usage of Alcohol and Drug Testing Devices;
 - ii. the collection, security, storage, supervision, and transportation of Alcohol and Drug Testing devices, and Alcohol and Drug specimens;
 - iii. the temporary storage, and shipping or transportation of Drug Test specimens to a Drug Testing laboratory; and
 - iv. the shipping or transportation of Alcohol Testing results.
- (n) **"Drug"** or **"Drugs"** includes any drug, substance, chemical, or agent, the use or possession of which is unlawful in Canada, and also includes any otherwise legal but illicitly-used substances, including Medications obtained without proper medical authorization, over-the-counter drugs, Tetrahydrocannabinol (THC)-containing substances, synthetic forms of illegal substances (e.g. synthetic marijuana, synthetic cocaine, and amphetamine analogues, etc.) and other substances not being used for their intended purposes.
- (o) **"Drug Paraphernalia"** means miscellaneous equipment or personal belongings used in the course of introducing Drugs into the body or associated with the use of Drugs, and includes any Adulterant.
- (p) **"EAP"** means BP Canada's Employee Assistance Program.
- (q) **"Employee"** means all regular full time, part time, seasonal, temporary and casual employees of BP Canada, including any employee on temporary assignment to BP Canada.
- (r) **"Fit for Work", "Fit for Duty" or "Fitness for Duty"** means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of Alcohol, Drugs, Medications, or Non-Prescription Medications.
- (s) **"Fitness for Duty Qualification"** means the process required by BP Canada with respect to all individuals employed in a SSP and may include medical, physical, and Alcohol and/or Drug Testing.
- (t) **"Human Resources"** means BP Canada's Human Resources Department.
- (u) **"Impaired Driving"** means driving offences where charges are laid, including, the offences referred to as impaired driving, blowing over the legal BAC (in that jurisdiction) or refusing to submit to a breath Alcohol and/or Drug Test.
- (v) **"Incident"** means any unplanned occurrence, circumstance, unsafe/unhealthy condition, or event that affected people, property, reputation, security, or the environment.
- (w) **"Law Department"** means BP Canada's Law Department.
- (x) **"Medication"** means any substance, chemical, or agent used for medicinal purposes that is obtained through prescription or over-the-counter.

- (y) **"MRO"** means a Medical Review Officer which is a physician certified in the interpretation of Alcohol and/or Drug Testing.
- (z) **"Near Miss"** means an undesirable event that under slightly different circumstances, could have resulted in harm to people, damage to environment, or property, or loss to process.
- (aa) **"Occupational Health"** means BP Canada's Occupational Health Department.
- (bb) **"Non-Prescription Medications"** means substances, chemicals, or agents used for medicinal purposes that can be lawfully purchased without a prescription.
- (cc) **"POCT"** means a Point of Collection Test, being a Drug Test performed outside of a certified laboratory using a variety of devices designed for this purpose. All POCT used by BP Canada will be performed at a Designated Collection Site under strict procedural guidelines.
- (dd) **"Policy"** means BP Canada's Alcohol and Drug Policy.
- (ee) **"Reasonable Cause"** or **"Reasonable Grounds"** includes information established by the observation of the actions, appearance, or conduct of an individual when on duty, reporting for duty, or on Scheduled Call that may be indicative of the use of Drugs or Alcohol, and may include but are not limited to observed use or evidence of use of Drugs or Alcohol, changes in job performance, erratic or atypical behaviour, physical appearance or changes in physical appearance, changes in behaviour, changes in speech patterns, changes in attendance record or unexplained absences during regular work hours, smell associated with Alcohol or Drugs on the individual or in the vicinity, the presence of Alcohol, Drugs, Drug Paraphernalia or Adulterants on the individual, in the vicinity, or in the area where the individual worked, lived or otherwise occupied, or circumstances surrounding an Incident or Near Miss.
- (ff) **"Return to Duty", "Returning to Duty" or "Return to Work"** means returning to active employment after a violation of this Policy, after a positive Alcohol and/or Drug Test, or following treatment for an Alcohol or Drug disorder.
- (gg) **"Safety-Sensitive Position" or "SSP"** means a position where individuals work with materials or equipment in an environment that poses a threat to the health or safety of the individuals, the work place, the work force, the public, or the environment if handled without proper care and attention, and includes workers at a SSWS. (See Appendix IV - Safety Sensitive Matrix for guidance with respect to SSPs).
- (hh) **"Safety-Sensitive Work Site" or "SSWS"** includes operations where due to the remote location, materials, or equipment on site, there are significant operating hazards such that any individual at that site that is impaired by Alcohol or Drugs presents an increased risk of a significant accident, or Incident or Near Miss occurring that poses a threat to the health or safety of the individuals, Employees, Contractors, Contract Workers, and Visitors at the work place, the work force, the public or the environment. Such sites include, but are not limited to, all offshore production or drilling installations or vessels, onshore construction or process facilities, remote work sites or remote work locations, or fabrication yards or warehouses. (See Appendix V - SSWS within BP Canada).
- (ii) **"SAP"** means a substance abuse professional.
- (jj) **"Scheduled Call"** means Employees who have been designated as being on-call in accordance with a communicated schedule.
- (kk) **"Security"** means BP Canada's Corporate Security Department or any third party contracted to provide security services at Company Premises.

- (ll) **"Substance Abuse Expert ("SAE")"** means a licensed physician, a licensed or certified social worker, a licensed or certified psychologist, a licensed or certified employee assistance expert, or an alcohol and drug abuse counsellor. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse.
- (mm) **"Supervisor"** means the individual in a leadership position or a position of authority over Employees, or over a particular facility, location, project, area, or shift, including team leaders, managers, superintendents, and others in positions of authority as designated by BP Canada from time to time.
- (nn) **"Tamper"** or **"Tampering"** means to alter, meddle, interfere or change.
- (oo) **"Vice President of Functional Unit"** means the Vice President of the relevant BP Canada business unit.
- (pp) **"Visitor"** means someone attending on Company Premises on an interim basis and who is on Company Premises no more than once per month for no more than three days. This may include an Employee, Contractor, or Contract Worker.

3.0 **ARTICLE 3 - Substances and Applicable Rules**

3.1 **Fitness for Duty**

All Employees are expected to report Fit for Duty and to remain as such throughout their work day, shift or while on Scheduled Call. The following standards have been established in order to minimize the risk of unsafe and unsatisfactory performance due to the use of Alcohol or Drugs.

3.2 **Drugs**

- (a) The following are prohibited when on Company Business, Company Premises, driving a Company assigned vehicle, on duty, or Scheduled Call, including during meals or other breaks (whether on or off Company Premises):
- i. the use, possession, distribution, offering or sale of Drugs, Drug Paraphernalia, Adulterants, or any product or device that could Tamper with any Drug Test;
 - ii. tampering with a sample for a Drug Test;
 - iii. reporting for duty or on Scheduled Call when being not Fit for Duty or having Drug levels at, or above, the cut-off levels set out in Appendix III; or
 - iv. the use of Drugs within the first eight hours after an Incident, Near Miss, Reasonable Grounds Drug Test request, or until a Drug Test is completed or the Employee is advised by Occupational Health that a Drug Test is not required.

3.3 **Alcohol**

- (a) The following are prohibited when on Company Business, Company Premises, driving a Company assigned vehicle, on duty, or on Scheduled Call, including during meals or other breaks (whether on or off Company Premises):
- i. the use, possession, distribution, offering, or sale of Alcohol or any product or device that could Tamper with an Alcohol Test;
 - ii. Tampering with a sample for an Alcohol Test;

- iii. reporting for duty or on Scheduled Call when being not Fit for Duty or having a BAC of 0.04 or greater (or in the case of an Employee in a SSP, having a BAC of 0.02 or greater); or
 - iv. the use of Alcohol within the first eight hours after an Incident, Near Miss, Reasonable Grounds Alcohol Test Request, or until an Alcohol Test is completed or the Employee is advised by Occupational Health that an Alcohol Test is not required.
- (b) Limited exceptions to subsection 3.3(a) are as follows:
- i. responsible use of Alcohol at special/organized business-related events (e.g., Canadian Association of Petroleum Producers dinners) is accepted, consistent with these standards, provided the Employee is not on Scheduled Call and otherwise complies with this Policy; and
 - ii. social functions sponsored by BP Canada and which have received prior management approval (See Appendix VI - Suggested Hosting Practices).

3.4 **Medications and Other Substances**

- (a) Employees are expected to use Medications and Non-Prescription Medications responsibly in the intended purpose and the manner as directed by the Employee's physician, pharmacist or manufacturer of the Medication and Non-Prescription Medication.
- (b) The illegal possession, distribution, offering or sale of Medications and the intentional misuse of Medications, Non-Prescription Medications or other substances (e.g., not using the Medication as prescribed or using someone else's Medication) while engaged in Company Business, on Company Premises, on duty or Scheduled Call, or while driving a Company assigned vehicle is prohibited. Misuse of Medication and Non-Prescription Medication includes:
 - i. taking in excess of the prescribed or recommended amount of a Medication or Non-Prescription Medication;
 - ii. taking Medication prescribed for someone else;
 - iii. taking Medication or Non-Prescription Medication for other than its intended purpose; or
 - iv. taking Medication or Non-Prescription Medication improperly (for example, in combination with Alcohol).
- (c) Medications of particular concern are those that may inhibit an individual's ability to perform their job safely and productively. All Employees are expected to investigate, through their physician or pharmacist whether a Medication can affect safe operation and take appropriate steps to minimize associated risk. If a medication has potentially unsafe side effects or may inhibit an Employee's ability to perform their job safely and productively Employees must report this to their Supervisor and request to have duties modified or delegated to another Employee.
- (d) Employees in a SSP must have the express agreement of a licensed medical practitioner that the Medication prescribed will not affect their ability to operate safely, must report any concerns to their Supervisor, or Occupational Health, and must abide by any requirement for modified work or other appropriate course of action to minimize safety risk.
- (e) BP Canada reserves the right, through the Supervisor or Occupational Health to confirm the need for modified work without breaching medical confidentiality.

3.5 **Scheduled Call Situations and Unexpected Circumstances**

- (a) Employees must remain Fit for Duty when on Scheduled Call and are expected to report Fit for Duty for any and all work. Under no circumstances should Alcohol or Drugs be used by Employees who are on Scheduled Call during their scheduled days off.
- (b) If unscheduled circumstances arise where an Employee is requested to perform services and has recently used Alcohol, Drugs or Medications, the Employee is expected to request that responsibility be delegated to another individual. The inability of an Employee to accept a work assignment in this situation will not result in disciplinary action.

4.0 **ARTICLE 4 - Prevention, Assistance and Rehabilitation**

4.1 **Prevention**

This Policy stresses the importance of prevention and early identification of potential problem situations. Employees will be provided with information on health and safety hazards, recognizing performance problems which could be related to Alcohol or Drug abuse, and the process to access EAP for assistance with an Alcohol or Drug problem, or any other problem that may be affecting their work performance.

4.2 **Assessment/Rehabilitation for Employees**

Employees who suspect they are developing or have a substance use problem or substance dependency issue are strongly encouraged to voluntarily seek advice and to follow appropriate treatment promptly before job performance or safety is affected or violations of this Policy occur. Employees or their Dependents who suspect they may have a substance dependency or emerging substance abuse problem may access EAP. An Employee's decision to seek assistance from the EAP will not result in disciplinary action; however, an Employee's use of the EAP will not be a defence to possible disciplinary action where facts establishing a violation of this Policy are obtained from sources outside the EAP.

4.3 **Voluntary Disclosure**

- (a) No Employee with an Alcohol, Drug, or Medication problem will be disciplined for voluntarily requesting help in overcoming their problem. However, in order for this provision to apply in a particular case, help must have been accessed prior to the Employee being notified that they must report for an Alcohol or Drug Test under this Policy, or prior to the initiation of disciplinary action under this Policy.
- (b) Disciplinary action under this Policy cannot be avoided by disclosure that the Employee is already involved in a treatment program.
- (c) Accessing assistance voluntarily does not eliminate the requirement for participation in a Return to Duty program to support recovery or the maintenance of satisfactory performance levels.

4.4 **Removal from Work**

Where, in the opinion of Occupational Health or a qualified professional from EAP, there is a risk that an Employee is not able to do their job safely; the Employee will be removed from duty, placed in a modified non-SSP, or removed from a SSWS until BP Canada management has received a Fit for Work clearance from Occupational Health. Within reasonable limits, work schedules will be adjusted to accommodate any period of time the Employee is required to attend a treatment or counselling program and coverage for Employees will be within the limits of the Company's benefits program.

4.5 **Return to Work Conditions**

- (a) All Employees who receive assistance or treatment as a result of his or her use of Alcohol, Drugs, Medications, or Non-Prescription Medications must comply with the terms and conditions of any rehabilitation program established as a condition of Returning to Duty and as a condition of his or her continued employment with BP Canada. All Employees who complete a primary treatment program will be subject to a follow-up program to support their recovery for a period of time to be determined on a case-by-case basis as part of a Return to Duty program.
- (b) Employees Returning to Duty will be required to abide by a monitoring program that includes unannounced or periodic Return to Duty Alcohol and/or Drug Testing as a condition of their Return to Work for a period of time to be determined on a case-by-case basis. These monitoring requirements will be documented in a Return to Duty or Return to Work agreement between BP Canada and the Employee.
- (c) Prior to Returning to Duty the Employee must have a Fit for Duty clearance from Occupational Health.

4.6 **Confidentiality**

BP Canada recognizes that for a rehabilitation program to be effective, confidentiality must be preserved. BP Canada will exercise reasonable care and precaution to protect Employee's confidentiality except where limited disclosure is necessary for related health and safety concerns (e.g., there is deemed to be a potential for risk to self, others, or the Company, or where disclosure is required by law).

5.0 **ARTICLE 5 - Procedures**

5.1 **Escort from Company Premises (Employees)**

- (a) If an Employee or Visitor is not Fit for Work or otherwise in violation of this Policy while on Company Premises or conducting Company Business, they will be safely escorted from the workplace. If the individual is an Employee, Occupational Health and the Employee's Supervisor will be notified. Wherever possible, removal from the workplace will only take place after consultation with and the agreement of a second Supervisor.
- (b) An Employee's Supervisor is responsible for assessing the situation, and where there are Reasonable Grounds to believe Alcohol or Drug use are a factor, the Employee will be referred for an Alcohol and/or Drug Test (See subsection 5.3 (e). Where the Supervisor does not reasonably believe Alcohol or Drug use are a contributing factor in the immediate circumstances, the Supervisor may refer the Employee to Occupational Health for a Fit for Duty assessment.
- (c) At a Supervisor's reasonable discretion, any Employee may be temporarily held out of service or reassigned, pending medical determination of Fitness for Duty, assessment of a potential Alcohol or Drug problem, or completion of an investigation into a possible violation of this Policy. An Employee in a SSP must not be allowed to perform any safety-sensitive duties until they have received a Fit for Duty clearance from Occupational Health. If an Employee is in a SSP or is held out of service by their Supervisor, the Employee must not be allowed to return to their position without the prior written consent of:
 - i. Occupational Health, after giving consideration to the Employee's Fit for Work status; and
 - ii. site management, after giving consideration to the job function performed, the safety of the work environment, and any appropriate conditions governing the Employee's Return to Work.

5.2 Possession of Alcohol or Drugs

If a Supervisor has Reasonable Grounds to believe that an Employee on Company Premises, while engaged in Company Business or while driving a Company assigned vehicle, may possess Alcohol or Drugs, a Supervisor must:

- (a) request or make reasonable inquiry that the Employee confirm whether or not he or she is in compliance with subsections 3.2 (a) and 3.3 (a) of this Policy; or
- (b) if appropriate, seek the assistance of Security or a peace officer to confirm that an Employee does not have in his or her possession Alcohol or Drugs.

5.3 Alcohol and Drug Testing

Refusal to submit to an Alcohol or Drug Test, refusal to sign any acknowledgment and consent form, failure to report directly for an Alcohol or Drug Test, refusal to agree to disclosure of an Alcohol or Drug Test result to BP Canada, or a confirmed attempt to Tamper with an Alcohol and/or Drug Test sample are all violations of this Policy and are grounds for disciplinary action up to and including termination of employment for cause.

Alcohol and/or Drug Tests will be conducted in the following circumstances:

- (a) **Contractual Obligation Testing:** Employees may be required to submit to Alcohol and/or Drug Testing, if the Company is required to conduct such testing as stipulated in a contract between the Company and its customers, if the Employee is requested to perform work for that customer, or if otherwise required, pursuant to the stipulations in the said contract to submit to Alcohol and/or Drug Testing.
- (b) **Pre-Employment for SSPs:** As part of the recruitment process, applicants for a SSP will be required to pass a certification process that will include an Alcohol and Drug Test. The applicant must not commence employment until the certification process is complete.
- (c) **Site Access Testing/Pre-Assignment Testing for SSPs:** Employees already employed by BP Canada who are attending or transferring to a SSP will also be required to undergo an Alcohol and Drug Test as a condition of site-access. All existing Employees that do not pass an Alcohol and Drug Test will be referred to Occupational Health for a Fit for Duty assessment. The Employee must not be transferred to the SSP, attend the SSWS, or perform any safety-sensitive duties until the Supervisor responsible for the position has been advised by Occupational Health that the applicant or Employee is Fit for Duty. All Visitors will be required to undergo Site Access Testing, unless accompanied at all times by a BP Canada Representative while at the SSWS.
- (d) **Fitness For Duty Testing:** BP Canada may periodically retest Employees in SSPs as part of the Fitness for Duty Qualification process. The Fitness for Duty Qualification process will occur within 24 months from the date of the Employee's last Fitness for Duty Qualification or according to a different time frame as determined by BP Canada based on BP Canada's experience over a reasonable period of time.
- (e) **Reasonable Grounds/ Reasonable Cause Testing:** Alcohol and/or Drug Testing will be required whenever a BP Canada Representative has Reasonable Grounds to believe that the actions, appearance, or conduct of an individual are indicative of the use of Alcohol or Drugs. In the case of an Employee, the decision to Alcohol and/or Drug Test must only be made by a Supervisor with the concurrence of a second Supervisor whenever possible. The following procedures will apply to all Reasonable Grounds / Reasonable Cause Alcohol and/or Drug Testing:

- i. the Employee's Supervisor must request that the Employee submit to an Alcohol and/or Drug Test;
 - ii. the basis for the decision to request an Alcohol and/or Drug Test must be documented as soon as possible after the request has been made;
 - iii. the referral for an Alcohol and/or Drug Test will be based on specific, personal observations including, but not limited to, those described in the definition of "Reasonable Cause" or "Reasonable Grounds" in accordance with subsection 2 (ee);
 - iv. in all situations where a Supervisor believes that an Employee is not Fit for Work on Company Premises, responsible escort procedures will be followed (See section 5.1);
 - v. Reasonable Grounds/Reasonable Cause Alcohol and/or Drug Testing must be conducted as soon as reasonably practicable once the determination has been made that Reasonable Grounds exist; and
 - vi. in remote locations, the Employee will be transported to a Designated Collection Site for the purpose of conducting a POCT under strict procedural guidelines.
- (f) **Incident or Near Miss Testing:** As part of a complete investigation, Alcohol and/or Drug Tests will be required for all Employees involved in, or who had a reasonable possibility of being included in, the chain of acts or omissions leading up to an Incident or Near Miss unless there is objective evidence that the acts and omissions of the Employee could not have been a contributing factor. The following procedures will apply to all Incident or Near Miss Alcohol and/or Drug Testing:
- i. the reasons for a decision to conduct or not conduct an Alcohol and/or Drug Test must be documented as part of the preliminary investigation as soon as reasonably practical after the Incident or Near Miss occurs;
 - ii. the decision to refer an Employee, or a group of Employees, for Alcohol and/or Drug Tests must only be made by a Supervisor investigating the Incident, or Near Miss in conjunction with a second opinion (i.e., preferably from Occupational Health, Human Resources, Law Department, Security, or, if none of these individuals are available, another Supervisor whenever possible).
 - iii. Incident or Near Miss Alcohol and/or Drug Testing must be conducted as soon as reasonably practicable following the Incident or Near Miss. In the case of an Alcohol Test which cannot be conducted within 8 hours of the Incident or Near Miss or in the case of a Drug Test which cannot be conducted within 32 hours of the Incident or Near Miss, attempts to obtain a sample will cease and the Supervisor investigating the Incident or Near Miss must provide the Vice President of Functional Unit with a valid reason why the Alcohol and/or Drug Test could not be completed (See subsection 5.3 (i));
 - iv. employees who are to undergo an Alcohol and/or Drug Test must not use Alcohol, Drugs, Medications, or Non-Prescription Medication until after the Alcohol and/or Drug Test has been completed;
 - v. in remote locations, the Employee will be transported to a Designated Collection Site as soon as possible; and
 - vi. failure to report an Incident or Near Miss is a violation of this Policy and will constitute grounds for discipline, up to and including termination of employment for cause.

- (g) **Return to Duty Alcohol and/or Drug Testing:** As a condition of continued employment with BP Canada, an Employee who has tested positive for Alcohol or Drugs and is Returning to Duty must comply with all conditions that may be imposed as part of any Return to Duty program in accordance with the following procedures:
- i. Testing After a Policy Violation: In any situation where employment is continued after a Policy violation of any kind whatsoever, Employees may be required to pass a Return to Duty Alcohol and Drug Test and may be subject to unannounced follow up Alcohol and/or Drug Testing as part of a Return to Duty agreement, to be developed on a case by case basis.
 - ii. Testing After Formal Treatment: Unannounced follow-up Alcohol and Drug Testing may form part of a follow-up program to support recovery for non-safety-sensitive positions and will be a condition of return to work for SSPs. This follow up Alcohol and Drug Testing will be developed on a case-by-case basis by Occupational Health in conjunction with the EAP and the treatment facility and will be documented in a "Return To Work Agreement" between BP Canada and the individual.
- (h) **Statutory or Regulatory Compliance:** Employees may be subject to Alcohol and/or Drug Testing as a requirement of federal or provincial statute, regulatory compliance or orders.
- (i) **Unable to Test:** If an Alcohol Test cannot be conducted within 8 hours of a request or a Drug Test within 32 hours of request then the collection process shall cease and the Employee must be referred to Occupational Health for a Fit for Duty assessment and the Supervisor must provide the Vice President of Functional Unit with a valid reason why the Alcohol or Drug Test could not be completed. Further, in any situation where an Alcohol and Drug Test cannot be done, the Employee must be held out of service for at least 24 hours, and an investigation must take place to BP Canada's satisfaction. The Employee will not be allowed to return to work for BP Canada without written permission and a Fit for Duty assessment from Occupational Health and will be required to adhere to any conditions governing their return.
- (j) **Refusal or Inability to Complete Alcohol and/or Drug Testing Process:** Refusal to submit to an Alcohol and/or Drug Test, failure to report directly for an Alcohol and/or Drug Test, refusal to sign the required consent and acknowledgment form, failure to produce an adequate sample without medical explanation, refusal to agree to the disclosure of an Alcohol and/or Drug Test result to BP Canada or a confirmed attempt to Tamper with an Alcohol and/or Drug Test are violations of this Policy and are grounds for discipline, up to and including termination of employment for cause.
- (k) **POCT:** The Company may in its discretion conduct screening Alcohol and Drug Tests using POCT methods. All POCT Alcohol and/or Drug Tests must be confirmed by an applicable test. Negative confirmations will not be a Policy Violation. The following procedures apply when POCT is used:
- i. Any Employee with a positive POCT Alcohol and/or Drug Test will be removed from duty pending lab confirmation of a positive Alcohol and/or Drug Test. Upon confirmation of a positive Alcohol and/or Drug Test a Policy violation will be deemed to have occurred.
 - ii. Employees in non-SSPs with a negative POCT may return to Company Business, until a negative laboratory confirmation Alcohol and/or Drug Test is provided to BP Canada.
 - iii. Employees in SSPs with a negative POCT will be assigned alternative work or be removed from the workplace with pay until a negative laboratory confirmation Alcohol and Drug Test is provided to BP Canada.

5.4 Impaired Driving

Because of BP Canada's concern for the health and safety of Employees in the workplace, and the safety of others on public or private roads, all Employees who operate a vehicle on Company Business or drive a Company assigned vehicle must adhere to the following provisions:

- (a) All Employees who are required to drive while on Company Business or who drive a Company assigned vehicle must have a valid operator's licence for the class of vehicle driven and may be required to furnish proof thereof upon request by a Supervisor. Any loss of licence (either temporary or permanent) which affects the requirement to drive as while on Company Business or drive a Company assigned vehicle must be reported to the Employee's Supervisor and the Employee will no longer be qualified to drive while on Company Business or drive a Company assigned vehicle. Further BP Canada reserves the right to suspend the Employees' employment without pay until such time as the Employee's operator's licence is fully reinstated, unless otherwise expressly agreed to in writing by the Company.
- (b) **Impaired Driving Charge:** These requirements apply to anyone who drives while on Company Business or drives a Company assigned vehicle:
 - i. An Employee who has been charged with an Impaired Driving offence while driving a vehicle on Company Business or while driving a Company assigned vehicle must inform their Supervisor immediately and must contact Occupational Health within 3 working days of the date of the charge for a Fit for Duty assessment.
 - ii. An assessment will be made by Occupational Health to determine if there is a need for a structured assistance program for the Employee, and, subject to subsection 5.4 (a), the Company will determine whether the individual should continue to be allowed to drive a Company assigned vehicle or operate vehicles or equipment on Company Business pending resolution of the charge. If there is any question about safety, a medical work limitation will be used for the Employee, who will be assigned to alternative duties where possible until the limitation is lifted.
 - iii. Any temporary loss/suspension of an operator's licence as a result of an Impaired Driving charge must also be reported to the Employee's Supervisor. Failure to do so may result in a range of disciplinary actions up to and including termination. All Impaired Driving charges or temporary loss/suspension of operator's licenses will result in a full investigation and a range of actions, which may include alternative work, discipline or any other appropriate action depending upon the circumstances.
 - iv. Subsequent Impaired Driving charges will result in progressive discipline up to and including termination of employment for cause.
- (c) **Employee's Impaired Driving Conviction:** If driving is a requirement of the Employee's job, a conviction (including pleading guilty) for an Impaired Driving offence when on Company Business or driving a Company assigned vehicle is grounds for disciplinary action up to and including termination of employment for cause. Each situation will be fully investigated and the action taken will depend upon the circumstances surrounding the event. In the event an Employee is convicted of an Impaired Driving offence the following procedures will apply:
 - i. Where an Employee is convicted of an Impaired Driving offence, the Employee is required to report the conviction and duration of their loss of licence to their Supervisor immediately. The Employee will no longer be qualified to drive on behalf of the Company or drive a Company assigned vehicle until their licence is restored, they have passed a Fit for Duty assessment, and they have been cleared by Occupational Health, to resume driving on behalf of the Company or driving a Company assigned vehicle.

- ii. An Employee who is convicted of an Impaired Driving offence when on Company Business or driving a Company assigned vehicle will be required to report to Occupational Health for a Fit for Duty assessment.
- iii. Employees may be assigned to alternative duties where there is any concern regarding safe performance of their job. Discipline may be initiated including progressive discipline and up to and including termination of employment for cause.
- iv. Those Employees that require a valid operator's licence to do their job may be accommodated in an alternative position until the licence is restored provided a reasonable alternative position is available. If driving is an essential part of the job and an alternative position is not viable because of availability or length of licence suspension, BP Canada may suspend the Employees' employment without pay until such time as the Employee's operator's licence is fully reinstated, or employment may be terminated for inability to uphold his or her contract of employment with the Company.
- v. If an Employee fails to report the conviction and loss of licence and continues to drive for BP Canada, as soon as BP Canada becomes aware of the situation, discipline may occur up to and including termination of employment for cause.

5.5 **Searches**

- (a) BP Canada reserves the right as a condition of employment or as a condition entry onto Company Premises, to conduct unannounced searches or inspections, including sniffer dog searches, to the extent necessary to ensure compliance with this Policy. Such searches or inspections will include searches for and seizure of Alcohol, Drugs, Drug Paraphernalia, or Adulterants on Company Premises where there are Reasonable Grounds to believe they may be present, where there has been a suspected breach of this Policy, or in the interests of enforcing this Policy at a SSWS.
- (b) Employees acknowledge that their continued employment with the Company and their entry onto Company Premises is deemed consent to a search and seizure, which may occur at any time while entering, on, or leaving Company Premises and when carried out pursuant to this Policy. Employees expressly acknowledge that their right to privacy and right to be secure against unreasonable search and seizure is expressly subject to the right of the Company to maintain a safe workplace, to ensure adherence to this Policy, and to ensure that no laws are being violated.
- (c) Searches of Company Premises will be conducted by Security in accordance with applicable procedures, laws and agreements, and will be undertaken in cooperation with appropriate law enforcement agencies where BP Canada deems it necessary to do so. Procedures for the conduct of searches are appended to this Policy as Appendix VII.
- (d) Searches of individuals and personal property will only be conducted by Security after receiving the individual's consent or when deemed appropriate by BP Canada in accordance with law enforcement agencies. Examples of items considered to be personal property include but are not limited to vehicles, briefcases, coveralls, and lunch pails.
- (e) Any attempt by an Employee to impede or prevent a search for and seizure of Alcohol, Drugs, Drug Paraphernalia, or Adulterants on Company Premises carried out pursuant to this Policy will be considered a serious breach of this Policy and may result in disciplinary action up to and including immediate termination of employment for cause.

5.6 **Hosting Policy**

- (a) BP Canada's current business and social environment include events during which Alcohol use may be involved. In the case of Company-related social activities, or in the course of business hosting, appropriate regard will be taken for the safety and well-being of the individuals present and the community. Therefore, suggested hosting practices have been established and set out in Appendix VI.
- (b) Alcohol may be permitted at organized Company sponsored social functions, provided the basic Policy standards are observed (e.g., Fit for Work). Employees are expected to control Alcohol consumption by being responsible in its use, and to use judgment and common sense in hosting others. Alcohol consumption should be managed so that there is no inappropriate behaviour at the function or impaired driving afterwards.
- (c) Any hosting situation that results in inappropriate behaviour or risk to health and safety of attendees or the community will result in a review of this Policy and active steps will be taken to ensure the problems do not occur again. Employees engaged in inappropriate hosting situations may be subject to discipline up to and including termination of employment for cause.

6.0 **ARTICLE 6 - Consequences of a Policy Violation**

6.1 **Consequences and Investigation**

- (a) For those Employees identified in SSPs, when the results of an Alcohol Test indicate a BAC of 0.02 or greater, but less than 0.04, the Employee will be removed from BP Canada Work immediately for the remainder of his/her shift with pay until:
 - i. a Return to Duty Alcohol test is completed with a result indicating a BAC of less than 0.02; or
 - ii. the start of the Employee's next regularly scheduled duty period, but not less than 8 hours following administration of the Alcohol Test.
- (b) When any Employee has a BAC of 0.04 or higher a Policy violation will be deemed to have occurred.
- (c) If an Employee violates the provisions of this Policy, does not meet satisfactory standards of work performance as a result of substance abuse, or refuses to participate in a substance abuse program, appropriate disciplinary action will be taken. In all situations, an investigation must be conducted and documented in order to verify that a Policy violation has occurred before appropriate action is taken. BP Canada has the authority and discretion to temporarily remove, reassign, suspend, or hold out of service any Employee who is believed to have violated this Policy pending a determination of Fitness for Duty, safety risk, a substance abuse problem, or an investigation into a possible violation of this Policy.

6.2 **Appropriate Discipline**

The Company may discipline an Employee who fails to comply with this Policy. The Company's response to violations will be governed by the following procedures:

- (a) Appropriate discipline for an Employee in a particular case depends, in part, upon the nature of the Policy violation and the nature of the Employee's job. Discipline may include a variety of reasonable measures, up to and including termination of employment for cause. Determination of the appropriate disciplinary measure will depend on the individual facts of each case, including the nature of the violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation. More severe disciplinary measures will be considered for Employees

occupying a SSP. If the Company decides to discipline or terminate for cause the employment of an Employee who fails to comply with this Policy the Company should also provide the Employee with a list of available SAEs or SAPs that the Employee can access at the Employee's expense.

- (b) Prior to the Company making a final decision with regard to disciplining or terminating the employment of an Employee who has failed to comply with this Policy, the Company shall direct the Employee to and the Employee shall meet with a SAE or SAP. The SAE or SAP must conduct an initial assessment of the Employee and make appropriate recommendations. The Employee must, through the SAE or SAP, provide the Company with a confidential report of the SAE or SAP's initial assessment and recommendations, after which the Company can make a decision on appropriate discipline.
- (c) The initial assessment is to be completed as soon as possible and the report shall be delivered to the Company within two (2) days of completion. Where the Employee refuses to comply with a referral request, fails to attend the assessment or to follow the course of corrective or rehabilitation action, the Employee will be subject to discipline, up to and including termination of employment for cause.
- (d) Where an Employee who fails to comply with this Policy is disciplined or terminated for cause, the Company may, in addition to any other requirement, give written notice to the Employee that he or she will not be returned to work or re-employed by the Company unless the Employee provides the Company with:
 - i. a certificate issued
 - A. by a SAE or SAP certifying that the Employee has successfully completed a treatment program and continues to comply with all the requirements of the treatment program; or
 - B. by a licensed physician with knowledge of substance abuse disorders certifying that the Employee is able to safely perform the duties he or she will be required to perform if re-employed by the Company; and
 - ii. a statement signed by the Employee acknowledging that the person agrees to any conditions imposed as part of a corrective treatment program and such other reasonable conditions as set by the Company. The Company may terminate for cause the employment of the Employee who fails to comply with the conditions set out in such statement.

7.0 ARTICLE 7 - Appendices

- I. BP Canada's Contractor Expectations
- II. Roles and Responsibilities of BP Canada and Employees
- III. Alcohol and Drug Testing Procedures
- IV. Safety Sensitive Matrix
- V. Safety Sensitive Worksites
- VI. Suggested Hosting Practices
- VII. Search Procedures

8.0 Reference Documents

- I. OMS CF 3.4- 0004a A&D Reasonable Cause Testing – Supervisor Document
- II. OMS CF 3.4-0004b A&D Reasonable Cause Follow-Up Form
- III. OMS CF 3.4-0004c A&D Worker's Acknowledgement and Consent Form
- IV. OMS CF3.4-0004d A&D Worker's Acknowledgement and Refusal Form
- V. OMS CF3.4-0004e Work Performance Checklist for Supervisors

9.0 Revision Log

Revision Date (dd-mmm-yyyy)	Reviser (Name/Title)	Approver (Name/Title)	Revision Details
23-Oct-2013	Denine Duncan, Management Systems Coordinator	Yvonne Gazzard, Health Director	Updated A&D Policy per MoC# 20098705

APPENDIX I - CONTRACTOR EXPECTATIONS

Contractors are expected to implement their own Alcohol and Drug Policies which at minimum meet the standards set out in the Policy and include contracting with third parties or MRO's for qualified Alcohol and Drug Testing services. Failure of Contractors to implement their own Alcohol and Drug Policies or failure of Contractors to meet the minimum requirements as set out in the Policy are grounds for disciplinary action up to and including permanent removal from Company Premises, BP Canada Work, or termination of BP Canada's contract with the Contractor.

While Contractors working on Company Premises or at SSWS are expected to implement their own Alcohol and Drug Policy, the following represent BP Canada's Contractor expectations.

1. Fitness for Duty

All Contractors and Contract Workers are expected to report Fit for Duty and to remain as such throughout their work day, shift, while on Scheduled Call or while driving a Company assigned vehicle.

2. Scheduled Call/Unexpected Circumstances

If unexpected circumstances arise where a Contract Worker is requested to perform services outside of their regularly scheduled hours and has recently used Alcohol or Drugs, the Contract Manager must inform the BP Representative and request that responsibility be delegated to another Contract Worker or Employee of BP Canada.

3. Voluntary Disclosure

Contractor Workers who voluntarily disclose they have an Alcohol or Drug Problem to BP Canada will be removed from Company Premises and the Contract Manager will be notified. Contractors will be responsible for dealing with the Contract Worker who makes voluntary disclosure. If the Contract Worker discloses to the Contractor that he or she has an Alcohol or Drug Problem the Contract Manager must ensure that the Contract Worker does not attend on Company Premises.

4. Removal from Work

Where in the opinion of a BP Canada Representative a Contract Worker is not able to perform their job safely a BP Canada Representative will notify the Contract Manager and the Contract Manager will be required to escort the Contract Worker off Company Premises.

5. Return to Work Conditions

Before being permitted to return to Company Premises a Contractor must confirm that any Contract Worker previously removed from duty or Company Premises is Fit for Work.

6. Escort from Company Premises

If a Contract Worker is not Fit for Work or otherwise in violation of this Policy while on Company Premises or engaged in Company Business, the Contractor Manager will be notified and required to escort the Contract Worker off Company Premises.

7. Alcohol and/or Drug Testing

In accordance with the terms of this Policy, a BP Canada Representative may require that a Contract Worker be tested for Alcohol and/or Drug use (See subsection 5.3 of the Policy). The BP Canada Representative may also request that the Contract Worker be removed from the Company Premises until such time as the Contractor furnishes BP Canada with satisfactory proof that the Contract Worker is Fit for Duty.

8. **Possession of Alcohol or Drugs**

If a BP Canada Representative or a Contract Manager has Reasonable Grounds to believe that a Contract Worker, while at or on Company Premises or on Company Business may possess Alcohol or Drugs, a BP Canada Representative or Contract Manager must:

- (a) request or make reasonable inquiry that the Contract Worker confirm whether or not he or she is in possession of Alcohol and/or Drugs; or
- (b) if appropriate, seek the assistance of Security or a peace officer to confirm that a Contractor Worker does not have in his or her possession Alcohol or Drugs.

9. **Impaired Driving**

It is the responsibility of the Contract Manager to ensure that Contract Workers who operate a Company assigned vehicle, or drive while on Company Business maintain a valid operator's license and may be required to furnish proof upon request by BP Canada or the BP Canada Representative.

In addition, any Contract Worker charged with or convicted of an Impaired Driving offense (including but not restricted to blowing over the legal Blood Alcohol Content in that jurisdiction, driving while impaired, or refusal to blow into a breathalyzer) when operating a Company assigned vehicle or while on Company Business is subject to the following:

- (a) they must inform their Contract Manager immediately who must inform the BP Canada Representative as soon as reasonably practicable;
- (b) the situation must be investigated; and
- (c) a range of actions will result, which may include medical assessment to determine if the individual has an Alcohol or Drug problem, alternative work, removal from Company Premises or BP Canada Work, or any other appropriate action depending on the circumstances. BP Canada reserves the right to suspend the Contract Workers' work without any payment whatsoever until such time as the Contract Worker's license is fully reinstated or the Contractor provides BP Canada with a suitable replacement Contract Worker.

10. **Searches**

BP Canada reserves the right as a condition of Contract Workers entry onto Company Premises or operating a Company assigned vehicle, to conduct unannounced searches or inspections, including sniffer dog searches, to the extent necessary to ensure compliance with this Policy. Such searches or inspections will include searches for and seizure of Alcohol, Drugs, Drug Paraphernalia or Adulterants on Company Premises where there are Reasonable Grounds to believe they may be present, where there has been a suspected breach of this Policy, or in the interests of enforcing this Policy at a SSWS.

- (a) Contract Workers acknowledge that their entry onto Company Premises or operating a Company assigned vehicle is deemed consent to a search and seizure, which may occur at any time while entering, on, or leaving Company Premises and when carried out pursuant to this Policy. Contract Workers expressly acknowledge that their right to privacy and to be secure against unreasonable search and seizure is expressly subject to the right of BP Canada to maintain a safe workplace, to enforce this Policy and to ensure that no laws are being violated.
- (b) Any attempt by a Contract Worker to impede or prevent a search for and seizure of Alcohol, Drugs, Drug Paraphernalia or Adulterants on Company Premises carried out pursuant to this Policy will be considered a serious breach of this Policy and may result in disciplinary action up to and including immediate removal of the Contract Worker from the Company Premises, refusal to allow the Contract Worker back onto the Company Premises and/or termination of the Contractor's contract with BP Canada.

11. **Consequences and Investigation**

If a BP Canada Representative has any reason to believe that a Contract Worker is not Fit for Duty, or otherwise in contravention of the basic intent and provisions of this Policy:

- (a) The Contract Manager or his or her designated representative will be notified and expected to escort the Contract Worker off Company Premises;
- (b) The Contract Manager or his or her designated representative will be expected to investigate the situation, and proceed with a Reasonable Grounds or Incident or Near Miss Alcohol and/or Drug Test at BP Canada's direction or on their own accord;
- (c) The Contract Manager or his or her designated representative must satisfy BP Canada that there was not a breach of Policy; and
- (d) At BP Canada's discretion, any Contract Worker may be temporarily held out of service or reassigned, pending medical determination of Fitness for Duty, assessment of a potential Alcohol or Drug problem, or completion of an investigation into a possible violation of this Policy by the Contractor. The Contract Worker will not be allowed to return to their position until the Contractor confirms the Contract Worker is Fit for Duty and without the prior consent of a BP Canada Representative after giving consideration to the job function performed, the safety of the work environment and any appropriate conditions governing return of the Contractor.
- (e) Any violation of these Policy provisions by a Contractor or Contract Worker including failure of an Alcohol and Drug Test, or failure to complete the Alcohol and/or Drug Testing process may result in permanent suspension or removal from BP Canada Work. Failure of Contractors to meet these expectations or conduct the required Alcohol and/or Drug Testing will be considered a breach of a condition of a contract and may result in triggering penalty clauses under the contract, or suspension or termination of the contract.

APPENDIX II - ROLES AND RESPONSIBILITIES OF BP CANADA AND EMPLOYEES

1. BP Canada

BP Canada is committed to working with its Employees, Contractors and Contract Workers to address Alcohol and Drugs in the workplace and to provide the proper awareness, education, effective intervention, and treatment. There is a shared responsibility for the successful implementation of the Policy. BP Canada will:

- (a) provide Employees and their families with access to confidential assessment, counselling, referral and aftercare services through the EAP and Occupational Health in a manner that places a priority on confidentiality, fairness and respect for the Employee and their family;
- (b) inform its Contractors if any of the Contract Workers violate the provisions of this Policy
- (c) take steps to provide a safe workplace;
- (d) make reasonable efforts to accommodate the Employee by providing the supportive environment necessary for successful rehabilitation;
- (e) encourage supervisory training and awareness in dealing with the use of Alcohol or Drugs in the workplace;
- (f) encourage responsible judgment in the use of Alcohol at Company functions;
- (g) ensure Alcohol and/or Drug Testing is performed only in specific circumstances and according to the standards as outlined in this Policy;
- (h) identify SSPs or SSWs; and
- (i) encourage compliance with the law in all jurisdictions where BP Canada operates.

2. Employees

Employees are expected to perform their job in a safe manner and in all ways consistent with established Company practices. In addition, Employees are expected to:

- (a) ensure they understand and comply with this Policy as part of their obligations to perform work activities in a safe manner;
- (b) bear responsibility for compliance with this Policy;
- (c) take responsibility to ensure their own safety and the safety of others;
- (d) arrive Fit for Work, and remain Fit for Work during their period of duty, free from any adverse performance effects of Alcohol, Drugs, Medications or Non-Prescription Medications;
- (e) report Fit for Work when on Scheduled Call;
- (f) decline the request to perform services that were not scheduled if under the influence of Alcohol, Drugs or Medications that may adversely affect performance;
- (g) conduct themselves in an appropriate manner while on Company Business or Company Premises;
- (h) consult with their doctor, pharmacist, or Occupational Health regarding the proper use of Medications and Non-Prescription Medications they are using to determine if they may have a negative impact on performance. Those in SSPs must report any concerns regarding the use of any performance altering Medications or Non-Prescription Medications to Occupational Health or their Supervisor so it can be determined whether modification of duties or temporary reassignment is appropriate;

- (i) seek advice and follow appropriate treatment promptly if they suspect they have a substance dependency or emerging problem;
- (j) cooperate with modified work schedules related to safety concerns;
- (k) participate in any Alcohol or Drug Testing or search request as and when required under the Policy;
- (l) report any Impaired Driving or Alcohol related driving offences;
- (m) follow any recommended follow-up program to support recovery or Return to Work conditions after primary treatment for Alcohol or Drug related problems; and
- (n) take appropriate action to ensure a co-worker does not remain not Fit for Duty at work that may endanger themselves or others. This may involve, on a confidential basis, contacting their Supervisor, Occupational Health, Human Resources or the Law Department for advice on what action to take.

3. Contractors

Any agreements between BP Canada and a Contractor relating to work performed on Company Premises or Company Business must contain a term which promotes workplace safety in a manner at least as rigorous as set out in this Policy. Contractors are expected to implement and adapt Alcohol and Drug Testing requirements which comply with the minimum standards set out in this Policy and adhere to the Contractor Expectations outlined in Appendix I.

4. Supervisors

Supervisors must be knowledgeable about this Policy and are encouraged to seek specific training on workplace Alcohol and Drug issues and on their role under the Policy, and will:

- (a) ensure they understand and comply with this Policy;
- (b) monitor and evaluate work performance with an objective of early identification and handling of all performance problems, including those which may be caused by Alcohol or Drug use;
- (c) confront Employees about performance problems;
- (d) where there are Reasonable Grounds to believe performance problems may be Alcohol and/or Drug related or health-related, make a formal written referral to Occupational Health for a Fit for Duty Assessment with a copy to the Employee;
- (e) ensure that a Fit for Duty assessment has been arranged, and that the Employee is escorted from the workplace when there are concerns about their immediate ability to perform the job, or there is concern that the individual's actions could jeopardize the safety of themselves or others and/or the reputation of the Company;
- (f) ensure investigations of Incidents or Near Misses are carried out in accordance with Company Incident or Near Miss investigation procedures;
- (g) refer a candidate or Employee for a pre-employment or pre-assignment Alcohol and/or Drug Test, a Reasonable Grounds/Reasonable Cause Alcohol and/or Drug Test or an Incident or Near Miss Alcohol and Drug Test as and when required to do so under this Policy (See section 5.3);
- (h) identify situations where an unannounced search for Alcohol, Drugs, Drug Paraphernalia or Adulterants on Company Premises is justified, and contact Security and site management (See section 5.5);
- (i) be responsible for monitoring Contractor compliance with this Policy, and Contractor Expectations outlined in Appendix I and take appropriate action where necessary; and
- (j) consult Human Resources as necessary to ensure consistency in application of the Policy.

5. Human Resources

Human Resources acts as a resource and support for Employees, Supervisors, and managers and is responsible for:

- (a) administering the Policy consistently in cooperation with Supervisors, Occupational Health and the Law Department;
- (b) resolving questions of interpretation with due regard for the fair treatment of Employees;
- (c) collecting the data needed to monitor, evaluate, and update the Policy as required;
- (d) coordinating, in conjunction with Supervisors, Occupational Health and the Law Department, the development and delivery of Employee and contractor Alcohol and Drug awareness educational programs, including information on the availability of treatment resources; and
- (e) assisting Occupational Health and the Law Department in coordinating, developing and delivering Supervisor training programs for performance monitoring and potential problem identification.

6. Occupational Health

Occupational Health provides an Employee support function and is responsible for:

- (a) understanding their obligations in a manner that is consistent with the Policy and in cooperation with Supervisors, Human Resources, and the Law Department;
- (b) resolving questions of interpretation with due regard for the fair treatment of Employees;
- (c) Fit for Work assessments and recommendations, including medical work limitations if required;
- (d) in conjunction with the Law Department (where appropriate) and EAP, developing programs to monitor Employees Returning to Duty after treatment for Alcohol or Drug related problems;
- (e) responding to requests for advice on an Employee's Fit for Work status arising from the effects of prescription and over-the-counter Medications;
- (f) issuing medical work limitations requiring modified work or temporary reassignment if legitimate Medication use, or other conditions, could affect performance;
- (g) functioning in an advisory capacity on all aspects of the Alcohol and Drug program for Employees and Contractors;
- (h) managing the Alcohol and Drug Test procedures; and
- (i) retaining and liaising with external resources, including, MRO, SAE and SAP as deemed appropriate.

7. EAP

EAP is responsible for:

- (a) providing confidential assessments, counselling, referral and aftercare services accessible to all Employees and Dependents;
- (b) maintaining an updated list of resource providers and ensuring optimal qualifications are met for education, training and experience;
- (c) providing guidance to all Employees, co-workers and Dependents dealing with Alcohol and/or Drug related problems;

- (d) informing appropriate personnel in situations where an Employee's misuse of Alcohol or Drugs presents an occupational safety risk;
- (e) training or providing consultation in the training of Supervisors and other Employees regarding the EAP function as it relates to performance management and progressive discipline processes;
- (f) educating or providing consultation to the education programs designed to inform all Employees about the Policy and the effects of substance use on health, safety and job performance, etc.;
- (g) involvement in ongoing Alcohol and Drug awareness prevention programs to address health and safety effects on performance and the process of EAP;
- (h) in conjunction with Occupational Health, playing a major role in the determination of an Employee's Fit for Work status, developing plans to monitor the Employee's return to work after treatment for Alcohol or Drug related problems; and
- (i) providing BP Canada with non-identifying statistical data regarding the extent of Alcohol and Drug use in BP Canada and making recommendations based upon findings of any Alcohol and Drug concerns.

8. Security

Security is responsible for:

- (a) participating in educational programs for all Employees regarding the use of Alcohol and Drugs in the workplace;
- (b) conducting training programs for Supervisors and site management regarding the advisability of conducting a search; and
- (c) providing advice and responding to Supervisor recommendations for an unannounced search for Alcohol, Drugs, Drug Paraphernalia or Adulterants on Company Premises and conducting searches in accordance with the terms of this Policy.

9. Law Department

The Law Department is responsible for:

- (a) providing ongoing advice to Human Resources, Occupational Health, Security, Supervisors and Company management in the implementation and defence of the Policy in order to protect the respective rights of the Employee and the Company;
- (b) monitoring related legal issues and cases and the introduction of government regulations that may affect the implementation of the Policy;
- (c) participating in determining the advisability of performing an Alcohol and Drug Test or conducting a search;
- (d) participating in the development, coordination and delivery of education, training and awareness programs for all Supervisors and Employees regarding this Policy and performance management in order to help ensure that the Policy is implemented effectively and consistently across the Company;
- (e) participating in the development, coordination and delivery of education and awareness programs for Contractors regarding the Contractor Expectations outlined in Appendix I;
- (f) in conjunction with Occupational Health and EAP, developing "Return To Work Agreements" to govern Employees returning to work after a violation of this Policy or treatment for Alcohol or Drug related problems; and
- (g) functioning in an advisory capacity on all aspects of the Policy.

APPENDIX III - ALCOHOL AND DRUG TESTING PROCEDURES

Sample collection, Alcohol and/or Drug Testing and reporting of results will be conducted in accordance with standards established by the U.S. Department of Health and Human Services and accepted in Canada in order to ensure the accuracy and integrity of results. Rigorous sample collection, storage and chain-of-custody procedures will be followed. In addition:

1. Employees who are proposed to be the subject of an Alcohol or Drug Test will be requested to sign a form immediately prior to the time of sample collection. The form will acknowledge the release of complete results to Occupational Health.
2. Except for the release of information in accordance with this Policy and in situations affecting the health and safety of workers and the public, results of all Alcohol and/or Drug Testing will be maintained by Occupational Health and will be kept confidential. In order to preserve the confidentiality of Alcohol or Drug Test results, Occupational Health and any person to whom disclosure is permitted under this Policy must not disclose the Alcohol and/or Drug Test results to any person other than a person who needs to know the Alcohol and/or Drug Test results to discharge an obligation under this Policy, or who has legal authority to require disclosure of an Alcohol and/or Drug Test result.
3. Alcohol and/or Drug Testing will be conducted as outlined under the Policy to determine the presence of marijuana metabolites, amphetamine/methamphetamine, cocaine metabolites, opiate metabolites, codeine/morphine, 6-acetylmorphine, phencyclidine, MDMA and Alcohol. The Alcohol and Drug Testing program will cover Alcohol and the specified Drugs only; it will not include Alcohol and/or Drug Testing for other substances or medical conditions. The Alcohol and/or Drug Testing requirements in a Return to Duty situation will be determined on a case-by-case basis.
4. Prior to any Alcohol or Drug Testing the Employee's identification will be reviewed and the Employee's identity confirmed and the Employee will be provided with the appropriate paperwork to complete prior to the Alcohol and/or Drug Test occurring. Identity must be confirmed by government or employer-issued ID or in the absence of this, by visual Supervisory confirmation.
5. Alcohol Tests will be administered by a calibrated breathalyzer that meets evidentiary standards, with a printout of Alcohol Test results. A second breathalyzer sample will confirm the initial test results.
6. All Drug Tests will be administered by urinalysis. Collection of urine specimens and administration of Drug Tests must be performed by appropriately certified third party nurses or technicians at Company Designated Collection Sites. All POCT screening tests must be confirmed by laboratory analysis.
7. In Incident, Near Miss and Reasonable Grounds Alcohol and Drug Testing situations, samples must be collected as soon as possible after the Incident, Near Miss, or Reasonable Grounds Alcohol and Drug Test request, but collection attempts will end 8 hours after the Incident, Near Miss, Reasonable Grounds request or other request for an Alcohol Test, and 32 hours after the Incident, Near Miss, Reasonable Grounds request, or other request for a Drug Test.
8. Urine samples must be analyzed by a fully qualified and accredited laboratory located either in Canada or the United States and accredited by the U.S. Department of Health and Human Services in accordance with the United States Department of Transportation requirements. The lab must use a two-step process with initial screening by immunoassay and all confirmations being performed by gas chromatography/mass spectrometry (GC/MS). Generally, collection services are contracted through the laboratory. Occupational Health will provide Supervisors with contact particulars for collection sites.
9. Confirmed positive Alcohol and/or Drug Test results must be reviewed by a trained and qualified MRO who will give the individual concerned an opportunity to explain the finding to the MRO before it is communicated to BP Canada. If the MRO concludes there is a legitimate medical reason for the positive result, it will be reported as

a negative to BP Canada; otherwise it will be reported as a verified positive result. The MRO will notify Occupational Health of the determination.

- For the purpose of this Policy, a positive Alcohol Test will be one in which the BAC is 0.04 or greater. A positive Drug Test is one in which the amount of Drug in the sample identified by the confirmation test is at or exceeds the cut-off levels established by the U.S. Department of Health and Human Services for workplace testing programs, as indicated in the table below or in any updates to the table issued by the U.S. Department of Health and Human Services. A sample will be confirmed as positive if the Drug is present at or above the cut-off level.

URINE Drug Concentration Limits Effective October 1, 2010 (Part 40 DOT)				
Initial Analyte	Test	Initial Test Cut-off Concentrations	Confirmatory Test Analyte	Confirmatory Test Cut-off Concentration
Marijuana Metabolites		50 ng/mL	THCA	15 ng/mL
Cocaine Metabolites		150 ng/mL	Benzoyllecgonine	100 ng/mL
Opiate Metabolites				
Codeine/Morphine		2000 ng/mL	Codeine	2000 ng/mL
			Morphine	2000 ng/mL
6-Acetylmorphine		10 ng/mL	6-Acetylmorphine	10 ng/mL
Phencyclidine		25 ng/mL	Phencyclidine	25 ng/mL
Amphetamines				
AMP/MAMP		500 ng/mL	Amphetamine	250 ng/mL
			Methamphetamine	250 ng/mL
MDMA		500 ng/mL	MDMA	250 ng/mL
			MDA	250 ng/mL
			MDEA	250 ng/mL

A ng/ml means nanograms per millilitre. A nanogram is one billionth of a gram. A millilitre is one thousandth of a litre.

- Any positive Alcohol and/or Drug Test will be considered in violation of this Policy, whether or not the Alcohol or Drugs were actually consumed on Company Business or Company Premises. A positive Alcohol and/or Drug Test result, failure to report directly for an Alcohol and/or Drug Test, refusal to submit to an Alcohol and/or Drug Test, refusal to sign the required consent and acknowledgment form, failure to produce an adequate sample without medical explanation, refusal to agree to disclosure of an Alcohol and/or Drug Test result to BP Canada, or a confirmed attempt to Tamper with a test sample are violations of this Policy and are grounds for disciplinary action up to and including termination of employment for cause.
- In the case of a verified positive Alcohol and/or Drug Test result, the person who has been tested may request that the MRO direct the split sample to another accredited laboratory to be retested. This request must be made by the donor within 72 hours of receiving the results. In the case of a second confirmed positive Alcohol and/or Drug Test, the person requesting the second analysis is responsible for the associated costs.

APPENDIX IV - SAFETY SENSITIVE MATRIX

		Work Activity					Areas of Impact				
		Severity of Work Activity	1	2	3	4	5				
Work Environment	Severity of Work Environment Exposure	Categories	<ul style="list-style-type: none"> Admin duties Office-based computer support Cleaning/janitorial services 	<ul style="list-style-type: none"> Abandonment / remediation 	<ul style="list-style-type: none"> Operations / maintenance Supervisory management Technical work Camp licensed food service 	<ul style="list-style-type: none"> Drilling Seismic Heavy equipment transport Light vehicle transport without passengers Completion/ well services Safety watch Hot work 	<ul style="list-style-type: none"> Product or hazardous goods transport Multiple person transport Emergency response 	People	Environment	Assets	Reputation
	1	<ul style="list-style-type: none"> Non-Operating Locations 	Non-Safety Sensitive	Non-Safety Sensitive	Potentially Safety Sensitive	Safety Sensitive	Safety Sensitive	Slight injury (first aid)	Slight	Slight damage <10K	Slight
	2	<ul style="list-style-type: none"> Low Risk locations 						Minor injury (medical aid)	Minor	Minor damage <100K	Limited
	3	<ul style="list-style-type: none"> Production Facilities Pipelines Proximity to sensitive environment Green field site Shop/yard manufacturing Camps 						Major injury (LTI)	Localized	Localized damage <500K	Considerable
	4	<ul style="list-style-type: none"> Exposure to hazards Rig site Time of day Working alone Brown field site 						Fatality	Major	Major damage <1 mil	National
	5	<ul style="list-style-type: none"> Remote (re:access to health care) Offshore 						Multiple fatalities	Massive	Extensive damage	International

APPENDIX V - SAFETY SENSITIVE WORKSITES

The following worksites have been identified by BP Canada as SSWS:

- Terre de Grace; and
- Offshore operations (Arctic, Nova Scotia).

APPENDIX VI - SUGGESTED HOSTING PRACTICES

1. The following situations are covered by these suggested hosting practices:
 - (a) Company sponsored social activities (i.e., funded by BP Canada) whether on or off Company Premises, (e.g., safety banquets);
 - (b) Company related activities that are a part of conducting Company Business, for example organized lunches or dinners; and
 - (c) Company social events, whether on or off Company Premises to which the Company contributes financially (e.g., the Company Christmas party).
2. Alcohol is permitted at organized Company social functions provided the basic Policy standards are observed (e.g., Fit for Work). Employees are expected to control Alcohol consumption by being responsible in its use and to use judgment and common sense in hosting. Alcohol consumption should be managed so that there is no inappropriate behaviour at the function or impaired driving afterwards.
3. When hosting events, the following guidelines will apply:
 - (a) Prior written management approval is required for the use of Alcohol at functions conducted on Company Premises;
 - (b) Alternative transportation arrangements will be available;
 - (c) Wherever practicable, professional/trained servers will work at each event or will supervise untrained servers; and
 - (d) Each event will have a designated "chief host/hostess" (e.g., facility manager, event convenor) with responsibility for:
 - i. establishing the general tone of the event;
 - ii. acting as the sole contact with the servers during the function regarding opening and closing times, food and beverage arrangements, etc.;
 - iii. ensuring bars are attended at all times;
 - iv. ensuring Alcohol is not served to individuals who appear to be intoxicated;
 - v. taking appropriate steps to prevent abusive or unsafe behaviour;
 - vi. taking appropriate steps to prevent an apparently intoxicated attendee from driving after the function;
 - vii. providing alternate transportation or accommodation where necessary; and
 - viii. contacting the police if an Incident or Near Miss occurs or an attendee disregards advice and attempts to drive in an intoxicated state.
4. In all situations, events will be managed in a way that avoids the potential for accidents, including identifying and eliminating potentially harmful situations (e.g., closing access to a major stairway).
5. Responsible serving practices will include providing food and non-alcoholic drinks, including coffee and tea after the bar has closed, establishing a firm time to end the event, and stopping service of Alcohol at least one hour prior to the end of the event.

6. Any hosting situation that results in inappropriate behaviour or risk to health and safety of attendees or the community will result in a review of these policies and active steps to ensure the problems do not occur again. Employees who engage in inappropriate hosting practices may be subject to discipline up to and including termination of employment for cause.

APPENDIX VII - SEARCH PROCEDURES

1. Where searches and seizures are conducted with the Employee or Contract Worker present the following search procedures will be followed:
 - (a) the individual will be immediately informed prior to the search and seizure:
 - i. that a search and possible seizure is being conducted;
 - ii. the reason for the search as per section 5.5 of the Policy;
 - iii. that the individual need not cooperate or provide any statement unless they so choose, but that appropriate law enforcement agencies may be contacted;
 - iv. that the search and seizure is a condition of employment or a condition of the contract between BP Canada and the Contractor; and
 - v. that the individual has the right to retain and instruct counsel without delay.
2. Where searches and seizures are conducted without the Employee or Contract Worker present, the Company will advise the affected Employee or Contract Worker as soon as is reasonably possible after the search and seizure as to what has occurred, and will also immediately inform the Employee on points (ii) through (v) above.
3. Any attempt by an Employee to impede or prevent a search and seizure of Alcohol, Drugs, Drug Paraphernalia, or Adulterants on Company Premises carried out pursuant to this Policy will be considered a serious breach of this Policy and may, at BP Canada's sole discretion, result in removal from Company Premises and in disciplinary action up to and including immediate termination for cause. Any attempt by a Contract Worker to impede or prevent a search and seizure of Alcohol, Drugs, Drug Paraphernalia, or Adulterant on Company Premises carried out pursuant to this Policy will be considered a serious breach of this Policy and may, at BP Canada's sole discretion, result in removal from Company Premises and in disciplinary action up to and including immediate termination of the contract.
4. Any seized Drugs, Drug Paraphernalia, or Adulterants which violate the terms of this Policy will be immediately impounded and tagged as to date, names of people present, and general description of the items, and then sealed in a container or bag and turned over to the appropriate law enforcement agency where appropriate to do so. The seized items will be kept in the exclusive possession of Security in a locked place until transferred to the appropriate law enforcement agency. The Employee or Contract Worker will be given a receipt for all seized items.

Recommended Actions to be taken following Searches with Substance Dogs:

1. Immediately following a sniffer dog search Security will accompany the sniffer dog search team and meet with the BP Supervisor to identify issues of concern and individuals (whether Employees or Contract Workers) that require further follow-up and Alcohol and/or Drug Testing.
2. In the event the sniffer dog search identifies Alcohol and/or Drugs on Company Premises or there are other Reasonable Grounds (as set out in subsection 2.(ee) of the Policy) that are indicative of the use of Drugs or Alcohol in the vicinity, or in the area where the individual worked, lived, or otherwise occupied, or circumstances surrounding an Incident or Near Miss, the individuals involved will be deemed to be in violation of the Policy. The BP Supervisor will contact the Employee or Contract Worker's respective Supervisors or Contract Managers and request:
 - That the Employee or Contract Worker identified by the sniffer dog searches or the Reasonable Grounds be safely escorted from site; and

- That the above identified Employees or Contract Workers not return to the SSP or SSWS until assurance can be provided that the individual is Fit for Duty;
3. Employees will be escorted from site and receive Alcohol and/or Drug Testing and a Fit for Work assessment in accordance with procedures outlined in this Policy.
 4. If the individual involved works for:
 - (a) a Contractor with its own Alcohol and Drug guidelines or policy the identified individuals will be removed from site and receive substance testing in accordance with the Contractor's policies and procedures. The Contract Manager will provide assurance to BP Canada that the Contract Worker is Fit for Duty before that individual is able to return to Company Premises or perform BP Canada Work; or
 - (b) a Contractor that does not have its own Alcohol and Drug guidelines or policy, the Contract Workers will be subject to Alcohol and/or Drug Testing in accordance with this Policy. The Contract Manager will provide assurance to BP Canada that the Contract Worker is Fit for Duty before that individual is able to return to Company Premises or perform BP Canada Work.