

ALCOHOL AND DRUG USE POLICY

The Company is committed to a safe, healthy, and productive workplace for all employees. The Company recognises that alcohol, drug, or other substance abuse by employees may impair their ability to perform properly and will have serious adverse effects on the safety, efficiency and productivity of other employees and the Company as a whole. The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or unprescribed drugs on company business or premises, is strictly prohibited and is grounds for termination. Possession, use, distribution or sale of alcoholic beverages on company premises is not allowed without prior approval of appropriate senior management. Being unfit for work because of use of drugs or alcohol is strictly prohibited and is grounds for termination of employment. While this policy refers specifically to alcohol and drugs, it is intended to apply to inhalants and all other forms of substance abuse.

The Company recognises alcohol or drug dependency as a treatable condition. Employees who suspect they have alcohol or drug dependency are encouraged to seek advice and to follow appropriate treatment promptly before it results in job performance problems. Medicine and Occupational Health Department will advise and assist in securing treatment. Those employees who follow approved treatment will receive disability benefits in accordance with the provisions of established benefit plans.

No employee with alcohol or drug dependency will be terminated due to the request for help in overcoming that dependency or because of involvement in a rehabilitation effort. However, an employee who has had or is found to have a substance abuse problem will not be permitted to work in designated positions identified by management as being critical to the safety and well-being of employees, the public, or the Company. Any employee returning from rehabilitation will be required to participate in a Company-approved after-care programme and to agree to the Rehabilitation/Aftercare contract. If an employee violates provisions of the employee Alcohol and Drug Use Policy and/or the terms of the Company-approved Rehabilitation/Aftercare programme contract, appropriate disciplinary action will be taken. Such action cannot be avoided by a request at that time for treatment or rehabilitation. If an employee suffering from alcohol or drug dependency refuses rehabilitation or fails to respond to treatment or fails to meet satisfactory standards of effective work performance, appropriate disciplinary action, up to and including termination, will be taken.

The Company may conduct unannounced searches for drugs and alcohol on company owned or controlled property. The Company may also require employees to submit to medical evaluation or alcohol and drug testing where reasonable cause exists to suspect alcohol or drug use, including following workplace incidents. Unannounced periodic or random testing will be conducted when an employee meets any one of the following conditions: has had a substance abuse problem or is working in a designated position identified by management, a position where testing is required by law, or a specified executive position. A positive test result or refusal to submit to a drug or alcohol test is grounds for disciplinary action, including termination.

The Company expects contractor, common carriers, and vendor personnel working at Company premises to comply with its Alcohol and Drug Use Policy. Failure to co-operate with the Company in this regard may result in removal from Company premises and denial of future entry.

In addition to the above policy, it is a requirement of the Company that all applicants accepting offers of regular employment must pass a drug test.