



PROVIDING MORE

Health, Safety and Environment Management System

MS20-STD4-Alcohol and Drug Requirements For Contractors

STANDARD

APPROVAL AND VERSION HISTORY

MS20-STD4-Alcohol Drug for Contractors		Version # 08
Approved by: Guy Greenwall	(signature)  _____ Senior Manager, Health, Safety & Environment	Date: 2020 Jan. 09

Version #	Description of Changes	Prepared By	Date
01	Initial release	Todd Gilchrist	2008 Jan. 1
02	Review and update	Guy Greenwall	2010 Dec. 15
03	Update Roles and Responsibilities due to organizational changes	Guy Greenwall	2013 Nov. 07
04	Review and update	Guy Greenwall	2017 Mar. 01
05	Update – Legalization of Cannabis	Guy Greenwall	2018 Oct. 17
06	Update to Table 1.	Guy Greenwall	2019 Mar. 21

07	Update to Appendices	Guy Greenwall	2019 Sept. 27
08	Update to Appendices	Guy Greenwall	2020 Jan. 08

TABLE OF CONTENTS

APPROVAL AND VERSION HISTORY	1
1.0 PURPOSE.....	4
2.0 SCOPE	4
3.0 METHOD.....	5
3.1 EXPECTATIONS.....	5
4.0 ROLES AND RESPONSIBILITIES	9
5.0 EXCEPTIONS	10
6.0 DEFINITIONS	10
7.0 TRAINING	12
8.0 ATTACHMENTS	12
9.0 RELATED DOCUMENTS.....	12
10.0 REFERENCES.....	12
11.0 RECORDS	12
APPENDIX 1 – Pre-Work / Pre-Site Access Testing Requirements for Contractors (includes testing for Safety-Sensitive Positions).....	13
APPENDIX 2 – Alcohol and Drug Testing Protocols	15
APPENDIX 3 – Drug Testing Levels	17

	ALCOHOL AND DRUG REQUIREMENTS FOR CONTRACTORS	STANDARD
		MS20-STD4
Date Developed: 2008 Jan. 01	Revision Date: 2020 Jan. 08	Last Reviewed: 2020 Jan. 08
Document Owner: EPCOR Health Safety Environment		Review Cycle: Every 3 years

1.0 PURPOSE

EPCOR (“EPCOR”) is committed to the health & safety of its employees, customers, contractors, suppliers, environment, property and the public. It is the intent of EPCOR to maintain a safe and efficient working environment, while ensuring individuals are treated fairly and with respect. The use of illicit drugs and the inappropriate use of alcohol and medications can adversely affect job performance, productivity, the work environment and the well being of employees. It can also place the integrity and safety of EPCOR property and operations at risk, impacting the individual, co-workers, customers, contractors, suppliers, and the public. Electrical generation, distribution and transmission, and water treatment and transmission are highly risk-sensitive operations that demand all potential safety risks be properly addressed, including those associated with alcohol or drug use.

This document is intended to outline the minimum expectations regarding alcohol and drug use and possession which have been set for all contractors. Contractors are encouraged to implement their own company policy, but are expected to ensure these requirements are met by everyone assigned to EPCOR work.

In those situations when testing is required, EPCOR will allow contract workers to use the company testing program, and will not require the Contractor to contract independently for a testing program. However, any Contractor accessing EPCOR’s testing infrastructure will be required to sign a waiver (See *MS20-STD4-RD2-Contractor Test Service Waiver*) indemnifying EPCOR from any legal liability associated with the provision of testing services. EPCOR reserves the right to bill the Contractor for reasonable and customary charges associated with providing this service.

2.0 SCOPE

The following provisions apply to all contractors while they are engaged in EPCOR business, at all times when on EPCOR premises or worksites, and when operating company vehicles and equipment. All contractors are expected to actively promote safe work habits for co-workers and other parties, and to take appropriate action where they believe there is a safety risk or potential violation. Because of the greater risk they may present, certain positions have been designated as “safety-sensitive” and individuals holding them will be expected to meet more stringent requirements.

3.0 METHOD

3.1 EXPECTATIONS

All contractors are required to enforce these requirements for their employees, sub-contractors and agents. Any contravention will be considered a breach of their contract.

3.1.1 ILLICIT DRUGS AND MOOD ALTERING SUBSTANCES

The following are prohibited while on EPCOR business, premises, and worksites:

- The use, possession, distribution, offering or sale of illicit drugs and other mood altering substances, and drug paraphernalia;
- Reporting for or being on duty under the influence of illicit drugs or other mood altering substances; and
- A positive drug test as determined through the testing program. *See Appendix 3.*

Note: For purposes of these Requirements, cannabis used in any form is considered a mood altering substance.

3.1.2 ALCOHOL

The following are prohibited while on EPCOR business, premises, and worksites:

- The use, possession, distribution, offering or sale of beverage alcohol;
- The consumption of any product containing alcohol (including beverage alcohol) when on duty including during meals or other breaks; and
- An alcohol test result of .04 Blood Alcohol Content (BAC) or greater;
- Consumption of alcohol within the first eight hours after an incident until tested or advised that a test is not required; and
- Transporting or storing beverage alcohol in a vehicle owned, assigned, or contracted by EPCOR for EPCOR business purposes.

Contract workers performing work designated as safety-sensitive must abide by all of these alcohol requirements and in addition:

- Must not report for duty under the influence of alcohol from any source; and
- Any contract worker who has an alcohol test result of .02-.039 will be removed from the workplace pending completion of an investigation.

3.1.3 MEDICATIONS

Contract workers are required to responsibly use all medications, including those that are prescribed and over the counter. They are required to investigate (through their doctor or pharmacist) whether a medication can affect safe operation by explaining their job requirements. They are required to take appropriate steps to minimize associated risk by using a safe alternative if available, and notify their company or an EPCOR representative of any need for modified work under the circumstances.

The following are prohibited while on EPCOR business, premises and worksites:

- Being unfit for work due to the use of a medication;
- The possession of prescribed medications without a legally obtained prescription, and distribution, offering or sale of prescription medications (trafficking); and
- The intentional misuse of medications (e.g. using the medication not as it has been prescribed, using someone else's prescription medication, combining medication and alcohol use against direction).

The use of cannabis for medical purposes is not permitted in conjunction with EPCOR work, or at any time on EPCOR premises and worksites.

3.1.4 LOSS OF LICENSE/IMPAIRED DRIVING

All individuals that operate a motor vehicle on behalf of the Contractor/EPCOR when on EPCOR work are required to maintain a valid driver's license. Any loss of license must be reported immediately, and the individual will no longer be qualified to drive any vehicle while performing work on EPCOR business, premises or worksites for the duration of the suspension.

Contract workers must inform their supervisor immediately if they have been charged with an impaired driving offense under the Criminal Code of Canada, or have received an administrative license suspension under provincial legislation when operating a vehicle on behalf of EPCOR. Impaired driving would include but not be restricted to blowing over the legal BAC in that jurisdiction, driving while impaired, or refusal to blow into a breath analyzer or provide a sample for testing. Receipt of a charge or license suspension will result in a full investigation, and action appropriate to the situation.

3.1.5 POSSESSION OF ALCOHOL OR DRUGS

EPCOR reserves the right to conduct investigations, including unannounced searches, when there are reasonable grounds to believe that alcohol and/or illicit drugs, other banned substances or products, including drug paraphernalia are present on premises owned, contracted or otherwise controlled by EPCOR. Any contract worker, who refuses to submit to a search requested by an EPCOR representative in accordance with this document, may be removed from EPCOR premises, and denied future access, depending on the circumstances.

3.1.6 INVESTIGATIONS – CONTRACTORS

EPCOR reserves the right to require a contractor to investigate a possible violation of this Standard if a contract worker is on duty in an unfit condition or is directly involved in a significant incident when on EPCOR premises or performing work on behalf of EPCOR. As a part of the investigation process, EPCOR reserves the right to request an alcohol and drug test for any person holding a safety sensitive position, at its discretion.

3.1.6.1 In the case of a contractor's employee, sub-contractor or agent who appears unfit on the job or is involved in a significant incident:

- The Contractor or EPCOR representative (if Contractor not on site) is expected to disengage the worker from the work, and remove them from the worksite;
- The Contractor will be expected to investigate the situation to EPCOR's satisfaction, which may include the requirement for an alcohol and drug test;
- The contractor must satisfy the EPCOR representative that there was not a breach of this Standard;
- If the Contractor confirms that a breach of this Standard has occurred, they are required to take the appropriate steps to prevent further risk to people, property, the environment or EPCOR business; and
- In the case of a confirmed violation, the individual will be removed from EPCOR work and the Contractor will prevent that individual from carrying out EPCOR work for the Contractor for a period of not less than 6 months. Confirmation of a negative test will be required prior to return.

3.1.7 INVESTIGATIONS – SOLE PROPRIETOR / SMALL INDEPENDENT CONTRACTOR

If a sole proprietor or small independent contractor is involved in a significant incident, or is identified by an EPCOR representative as being in an unfit condition while on duty, the individual will be removed from EPCOR work and an investigation will be undertaken. As a part of the investigation process, EPCOR reserves the right to request an alcohol and drug test for any person holding a safety sensitive position, at its discretion.

3.1.7.1 In the case of a safety sensitive sole proprietor or small independent contractor, who appears unfit on the job or is involved in a significant incident, the individual will be escorted from the worksite and given an opportunity to explain the situation. If as a result of the preliminary investigation the EPCOR representative still believes the individual is unfit for normal duty, or otherwise in violation of this Standard, and after consultation and agreement of a second person whenever possible:

- The individual will be taken for a reasonable cause test if there are grounds to believe alcohol or other drugs may be a contributing factor; or
- If there are grounds to believe there is a medical problem, the individual will be taken for appropriate medical attention; or
- The EPCOR representative will take other action appropriate to the situation; and
- In the case of a confirmed violation resulting from this investigation, the individual will be removed from EPCOR work and prevented from carrying out EPCOR work for a period of not less than 6 months. Confirmation of a negative test will be required prior to return.

See *MS20-STD4-RD1-Contractor/Sole Proprietor Acknowledgement Form*

3.1.8 ALCOHOL AND DRUG TESTING

All testing undertaken for compliance with this document for Contractors must meet the standards set out in *Appendix 2 – Alcohol and Drug Testing Protocols and Appendix 3 – Drug Testing Levels*. In addition, any testing undertaken to meet the pre-work (safety-sensitive position)/pre-access testing requirements must also meet the standards set out in *Pre-work / Pre-site access testing*.

EPCOR requires:

Pre-Work (Safety-Sensitive Positions) / Pre-Access

- All identified safety-sensitive contract workers to undergo an alcohol and drug test prior to the commencement of work.
- Where the nature of the work and/or hazards of the worksite, be such that the safety of the workers or protection of property or the environment could be highly impacted as a result of alcohol or drug risk factors require all contract workers, to undergo an alcohol and drug test prior to accessing designated work sites.
- Confirmation that the test occurred within the past 90 days by the contract company with proof if requested is sufficient.
- Failure to pass the test(s) or refusal to participate means the individual is not eligible to perform the work and/or access the worksite.

Post Incident

- As part of an investigation into a significant work-related incident, EPCOR reserves the right to request an alcohol and drug test for any person holding a safety sensitive position, at its discretion. Review the requirement for a post incident alcohol and drug test in accordance with the guidelines presented.
- Should there be a delay in collecting a sample because medical attention is required, contract workers to be tested must be advised to provide notification of their release, and must not consume alcohol, cannabis, or any other substance or product that would impact results until after the test has been completed, or they are advised a test is not required. The only exceptions, if required, are previously prescribed medications (as directed), or medication administered in the treatment of an acute injury resulting from the incident.
- A test will not be necessary if there is clear evidence that the acts or omissions of employees or contract workers could not have been a contributing factor. Employees or

contract workers referred for a test will only be those who are identified as having been directly involved in the chain of acts or omissions leading up to the event.

Unfit for Duty / Reasonable Cause

- For contract workers in a safety sensitive position as part of an Unfit for Duty Investigation and whenever the company has reasonable cause to believe that the actions, appearance or conduct of an individual while on duty are indicative of the use of drugs or alcohol, require a reasonable cause alcohol and drug test.

NOTE: EPCOR may, at its sole discretion, choose to omit any or all of the above alcohol and drug testing requirements. Such omissions shall be managed as exceptions to the norm and where allowed shall require the implementation of alternative control measures. Exceptions and alternative control plans require the approval of the Business Area Senior Vice President, in consultation with EPCOR Health, Safety and Environment.

3.1.9 ACCESS TO TESTING SERVICES

The requirements for testing under this document are provided in the appendices, and any contractor conducting testing under their own policy in a situation triggered by an incident at an EPCOR site is expected to meet these requirements. In those situations where testing is required and the contractor does not have their own program set up, EPCOR will allow contractors to access EPCOR's employee testing system or to independently obtain testing services (using procedures consistent with those set out in this document).

Any contractor accessing EPCOR's employee testing system will be required to sign a waiver (See *MS20-STD4-RD2-Contractor Test Service Waiver*) indemnifying EPCOR from any legal liability associated with the provision of testing services. EPCOR reserves the right to invoice the contractor for reasonable and customary charges associated with providing this service.

In addition, contractors must ensure that their testing protocol includes a requirement for their workers to sign a release indicating the name of the donor and that results can be released to EPCOR. In any situation where workers are tested under EPCOR's testing system, that individual must confirm in writing that their results can be released to EPCOR. EPCOR will not receive specifics of the test results. The communication of positive, negative or tampered results confirms compliance with *Appendix 2 – Alcohol and Drug Testing Protocols and Appendix 3 – Drug Testing Levels*.

3.2.0 VIOLATIONS OF THE ALCOHOL AND DRUG REQUIREMENTS

If there is any reason to believe any Contract worker is on duty in an unfit condition, or otherwise in contravention of the basic intent and provisions of these requirements, an investigation will take place.

3.2.0.1 FAILURE TO TEST

Failure of a safety sensitive sole proprietor or small independent contractor to complete the testing process when required by an EPCOR representative is a violation of this Standard. This includes failure to report directly for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to the Designated Program Administrator at the site, a confirmed attempt to tamper with a test sample, or failure to report involvement in an incident which may require testing.

Failure of a contractor to fully investigate a possible breach of this Standard to EPCOR's satisfaction will result in removal of the individual suspected of breaching this Standard from EPCOR work for a period of not less than 6 months, at which time a reassignment alcohol and drug test must be passed as part of the reassignment process, and additional conditions may apply.

3.2.0.2 CONSEQUENCES

Failure of a Contract worker to abide by these provisions may result in permanent removal from EPCOR work. Failure of the Contractor or the Contractor's representatives, to meet these expectations may be considered a breach of the contract, and may result in triggering penalty clauses under the contract, or suspension or termination of the contract.

4.0 ROLES AND RESPONSIBILITIES

Contractors are required to:

- Advise their representatives of the expectations set out under this Standard.
- Ensure that their representatives remain free from any adverse performance effects of alcohol or other drugs by enforcing these requirements for their employees, sub-contractors and agents, when working on EPCOR business, premises or worksites.
- Administer their Alcohol and Drug program where applicable to ensure compliance with EPCOR's requirements.

Contract workers while on EPCOR business, premises or worksites are required to:

- Report fit for duty, and remain fit throughout their work day or shift,
- Adhere to the fitness for duty requirements that have been set out in this Standard,
- Co-operate with an investigation into a violation including any testing requirements, and
- Conduct themselves in an appropriate manner.
- Report any persons performing EPCOR work or who are EPCOR premises who may be in violation of these requirements.

If unexpected circumstances arise where a contract worker is requested to perform services while under the influence of alcohol or other drugs, or in any condition which could impact safe operations, it is the responsibility of that individual to inform the Contractor or EPCOR representative that he or she cannot accept that assignment.

EPCOR Health, Safety and Environment will be responsible for:

- Consistent administration of this Standard;
- Resolution of any questions of interpretation;
- Coordinating development and delivery of employee education and supervisor training programs, including refreshers, as required;

Program Administrators

- Ongoing management of the alcohol and drug testing program.
- Supporting supervisors/managers in meeting their responsibilities
- Ensuring the contractor program is implemented consistent with the Standard's requirements

Sole Proprietor / Small Independent Contractor Relationships

- Ensure that they remain free from any adverse performance effects of alcohol or other drugs by following this standard when working on EPCOR business, premises or worksites.
- Sole proprietors will participate with EPCOR's alcohol and drug testing protocols by signing document *MS20-STD4-RD1 Alcohol and Drug Contractor/Sole Proprietor Acknowledgement form*. Test results will be provided to EPCOR referenced only as "Pass or Fail". Specific test results will not be shared with EPCOR by the third party program administrator.

5.0 EXCEPTIONS

This section left intentionally blank.

6.0 DEFINITIONS

The following definitions are provided for clarification. Where questions arise with respect to the meaning of any of the terms listed below, in the context of this Standard, EPCOR's interpretation shall prevail.

EPCOR Business

Refers to all business activities undertaken by employees or contract workers in the course of EPCOR's operations, whether conducted on or off EPCOR premises.

EPCOR Premises and Worksites

Includes but is not necessarily restricted to all land, facilities, mobile equipment and vehicles owned, leased or otherwise directly controlled by EPCOR for the purpose of conducting EPCOR business, as well as any location an individual is assigned to perform work on behalf of EPCOR.

EPCOR Representative

Refers to the individual accountable for a particular facility, department or area including managers, and others in supervisory positions who are directing individuals.

Drug

Means any substance, including but not limited to alcohol, illicit drugs, medications or other substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this Standard, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.

Alcohol

Means the intoxicating agent in beverage alcohol, ethyl alcohol, medicines or other low molecular weight alcohols including methyl and isopropyl.

Beverage alcohol

Refers to beer, wine and distilled spirits.

Illicit drug

Means any drug or substance which is not legally obtainable, and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. including but not limited to street drugs such as cocaine, and methamphetamine).

Medication

Refers to a drug obtained legally, either over-the-counter or through a doctor's prescription or appropriate authorization.

Mood Altering Substance Refers to any other product that is legally or illegally used resulting in cognitive or physical limitations that negatively impact performance on the job (e.g. any product containing cannabis including inhaled products or consumables, synthetic cannabinoids, "bath salts", doda, khat, solvents, inhalants and other similar products).

Drug Paraphernalia

Refers to any personal property which is associated with the use of any drug, substance, chemical or agent. This would also include any product or device that may be used to attempt to tamper with a testing sample.

Fitness for Work/Duty

In the context of this Standard means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of alcohol, illicit drugs, medications or other substances. Drug levels to be below those in *Appendix 2 – Alcohol and Drug Testing Protocols and Appendix 3 – Drug Testing Levels*.

Refusal to Test would include:

- failure of an employee or contract worker to report directly for a test, refusal to submit to a test;
- failure to provide a valid specimen absent a documented medical condition;
- a confirmed attempt to tamper with a test sample;
- refusal to agree to disclosure of a test result to the Company Program Administrator;
- attempting to avoid a test by failing to report involvement in an incident which may require testing or by avoiding management following involvement in an incident;
- failure to advise of release from hospital if testing is delayed for medical reasons;
- failing or refusing to attend a medical evaluation where required under the Standard;
- and
- any attempt to disrupt the testing process as described in the Standard.

Safety-Sensitive Position

Is a position in which the job function, including non-routine and emergency duties, involves responsibility for actions or decisions which, if not performed correctly, could directly cause or contribute to:

- A significant incident affecting the health or safety of employees, contractors, customers, the public or the environment, or
- An inadequate response or failure to respond to an emergency or operational situation.

This category includes any and all personnel required to temporarily relieve in, or perform safety-sensitive duties. For purposes of this Standard, the following work has been classed as safety-sensitive:

- All work on an energized system and/or whose work zone may include an energized system including, but not limited to, electrical, water, gas, hydraulic, pneumatic, chemical, steam and stored energy
- All work involving the operation of vehicles with a GVWR of 5,000 kg or higher
- All work involving the operation of mobile equipment including, but not limited to, backhoes, cranes, radial arm diggers, trenchers, skid steers, personnel aerial devices, and power industrial lift trucks
- All work with water, waste water, and electrical generation, transmission and distribution system process control, operations, programming and testing responsibility
- All individuals who are responsible for ensuring water quality by way of testing and quality assurance (QA) processes as it relates to public health and safety; and/or
- Where the nature of the work and/or hazards of the worksite, be such that the safety of the workers or protection of property or the environment could be highly impacted as a result of alcohol or drug risk factors Operating units may identify additional positions as safety-sensitive for their operations and individuals affected will be notified

Significant Incident

Any incident that results in, or may reasonably have resulted in, any of the following:

- An injury that results in an employee:
 - Fatality;
 - Lost-time injury; or
 - Medical treatment injury (As defined by CEA and the Bureau of Labor Statistics (BLS)).
- An injury to a customer, member of public or other 3rd party not directly associated with, but injured as a result of, EPCOR business
- An environmental incident that is reportable under Provincial or Federal legislation;
- Loss or damage to property, equipment or vehicles \geq \$7500 (includes all associated company, customer, public and other 3rd party damage or loss)
- Significant production upset or loss \geq \$50,000
- Significant loss of EPCOR or client revenues \geq \$50,000;
- Significant damage to EPCOR's reputation
- Any other significant work-related incident or a near hit considered to have had significant potential for more serious consequences

Sole Proprietor / Small Independent Contractor Relationships

Contract relationships where the nature and/or complexity of the work, or relationship, or the origin of the contractor do not warrant or support the contractor having their own testing processes.

7.0 TRAINING

This section is left intentionally blank.

8.0 ATTACHMENTS

- Appendix 1 – Pre-work / Pre-site Access Testing Requirements for Contractors
- Appendix 2 – Alcohol and Drug Testing Protocols
- Appendix 3 – Drug Testing Levels

9.0 RELATED DOCUMENTS

- MS20-STD4-RD1-Contractor/Sole Proprietor Acknowledgement Form
- MS20-STD4-RD2-Contractor Test Service Waiver

10.0 REFERENCES

This section is left intentionally blank

11.0 RECORDS

Completed Contractor Test Service Waiver

Completed Contractor/Sole Proprietor Acknowledgement

APPENDIX 1 – Pre-Work / Pre-Site Access Testing Requirements for Contractors (includes testing for Safety-Sensitive Positions)

Contractors Requiring Pre-Work or Pre-Access Testing

- All unescorted contract workers who hold a safety sensitive position at all EPCOR locations are subject to the requirements with the exceptions below;
- All unescorted contract workers assigned to specific sites considered risk sensitive because the nature of the work and/or hazards of the worksite are such that the safety of the workers or protection of property or the environment could be highly impacted as a result of alcohol or drug risk factors; and
- All unescorted contractors who hold a safety-sensitive position or work at locations designated as requiring pre-work/pre-site access testing who are returning to the site/work after an absence of 90 days or more.

Exceptions

- Contractors who can verify, with documentation, that a negative alcohol and drug test consistent with EPCOR's testing requirements and procedures has been conducted within the last ninety (90) days and have not had a non-compliant test result within that timeframe.
- Contractors who have previously completed a negative alcohol and drug test consistent with EPCOR's testing procedures, and have remained in continuous employment with the current contract company since the date of that test, and have not had a non-compliant test result in that time. Continuous employment means without termination of employment or lay-off for a period of 90 days or more.
- Contractors will not be required to be tested if present on the EPCOR premises for temporary, short term, day by day access. This would include but is not limited to vendor representatives, visitors, government agents, or consultants that may from time to time access EPCOR premises for training sessions, visits, tours, inspections or deliveries. These individuals must be escorted at all times while on EPCOR premises by an EPCOR representative.

Testing Requirements

- Alcohol and drug testing must be administered in compliance with the testing standards set out in *Appendix 2 – Alcohol and Drug Testing Protocols*, and using a trained collector and a laboratory that is certified by the U.S. Department of Health and Human Services (DHHS) which uses procedures consistent with those set out by DHHS. All samples that do not test negative must be reviewed by a Medical Review Officer who is independent of the laboratory and provides the donor with an opportunity to discuss the result.
- Contract companies may use point of collection urine testing (quick tests) for initial screening, provided they are satisfied with the reliability and accuracy of the test results, and that adulteration checks are done at the time of collection. All non-negative tests must be forwarded to a certified laboratory for confirmation. Point of collection oral fluid testing is not acceptable for this program.
- The test must conclude that no drug was detected at levels in excess of the limits set out in *Appendix 3 – Drug Testing Levels*, and that no evidence of tampering with or substitution of the sample was found.
- The test must be completed and results known before deployment to EPCOR premises and within the last 90 days unless the individual qualifies for an exception.

- It is the sole responsibility of the contract company to organize, administer, implement and pay for all activities related to the required pre-site access tests performed on its employees and representatives. The contract company must maintain sufficient records to demonstrate compliance to this Standard promptly upon request by an EPCOR representative.
- A positive alcohol test is one in which the blood alcohol concentration in the sample identified by the confirmation test is equal to or in excess of the limits set out in *Appendix 2 – Alcohol and Drug Testing Protocols*.
- 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 (DHHS) for workplace testing programs throughout North America, as set out in *Appendix 2 – Alcohol and Drug Testing Protocols and Appendix 3 – Drug Testing Levels*.

APPENDIX 2 – Alcohol and Drug Testing Protocols

- The alcohol and drug testing process is based on rigorous collection, analysis and reporting procedures designed to ensure the accuracy and integrity of the results. Steps in the testing process are highlighted below.
- Testing will be conducted in those circumstances outlined in this standard to determine the presence of cannabinoids, amphetamine/methamphetamine, cocaine, opiates, phencyclidine, 6-Acetylmorphine, fentanyl and alcohol. The testing program will cover alcohol and the specified drugs only; contractors who wish to test for other substances must do so under their own policy.
- Alcohol tests will be administered by a calibrated breathalyzer with a printout of test results. All drug tests will be administered by urinalysis or saliva (oral fluid) analysis. Only in those situations when a breath analyzer is not readily available will alcohol testing be done with a saliva strip and urine collection for analysis in the laboratory. A “point of collection” (quick test) urine drug screening test can be administered, provided appropriate adulterant checks are utilized and any result that is not negative is forwarded to a laboratory for confirmation analysis. Point of collection oral fluid testing is not acceptable for this program.
- Collection of urine or saliva specimens and administration of alcohol tests will be performed by trained nurses or trained collection agents. In post incident and reasonable cause testing situations, samples will be collected as soon as possible after the triggering incident, but collection attempts will end eight (8) hours after the incident for an alcohol test, and thirty-two (32) hours after the incident for a drug test. Any reason for a delay beyond two hours must be documented and provided to the EPCOR representative.
- All individuals who are tested are required to sign a form to acknowledge the accuracy of the employee and employer information and authenticity of the specimen(s). They will be given a copy of the Drug Testing Custody and Control Form and the Breath Alcohol Testing Form for their records.
- Urine samples will be analyzed by a fully qualified laboratory accredited by the DHHS using a two-step process with initial screening by immunoassay and all confirmations being performed by gas chromatography/mass spectrometry (GC/MS). If a point of collection screening device is used, any non-negative result will be forwarded to a laboratory for confirmation analysis. If non-negative urine sample indicates cannabis, oral fluid testing will be administered and sent with the urine sample to the lab for confirmation analysis. Oral fluid samples will be analyzed at the laboratory with all confirmations being performed by liquid chromatography/mass spectrometry (LC/MS).
- Confirmed positive test results will be reviewed by a qualified Medical Review Officer (MRO) who is independent of the laboratory and who will provide the donor an opportunity to discuss the result in an effort to determine whether a positive test could have resulted from the legitimate use of medications or other medical explanations. The individual concerned will be given an opportunity to explain the finding to the MRO, who will then determine whether the result will be reported to the company as a negative, verified positive, tampered or substituted result.
- For the purpose of this Standard, a positive alcohol test will be one in which the blood alcohol concentration is at or above .04 BAC, and action will be taken appropriate to the situation. In those instances where an individual is subject to an unannounced testing program as a condition of return to assignment with EPCOR, a positive test will be one in which the blood alcohol concentration is .02 or more. For the purposes of Certification Testing to a Safety Sensitive Position, a positive test will be one in which the blood alcohol concentration is at or above .04.

- Employees and contractors holding designated safety and risk-sensitive positions must abide by all of these alcohol expectations and in addition:
 - Must not report for duty under the influence of alcohol from any source;
 - Will be removed from duty for at least 24 hours as a result of an alcohol test result of .02-.039 BAC, and may be subject to progressive discipline.
- A positive urine 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 noted in *Appendix 3 – Drug Testing Levels*, which have been established for workplace testing programs throughout North America.

APPENDIX 3 – Drug Testing Levels

The cut-off levels noted below have been established for workplace testing programs throughout North America.

Table 1. Urine drug concentration limits

Drugs or Classes of Drugs	Screening Concentration (Initial Test Levels) ng/ml	Confirmation Concentration (Confirmed Test Levels) ng/ml
Cannabis	50	15
Cocaine	150	100
Opiates (Codeine / Morphine)	2000	2000
6-Acetylmorphine (Heroin)	10	10
Phencyclidine (PCP)	25	25
Amphetamines	500	-
Amphetamine	-	250
Methamphetamines	-	250
MDMA	500	250
MDA	-	250
Fentanyl	20	1

* A ng/ml means nanograms per milliliter. A nanogram is one billionth of a gram, a milliliter is one thousandth of a liter.

Table 2. Oral fluid drug concentration limits

Drugs or Classes of Drugs	Screening Concentration (Initial Test Levels) ng/ml	Confirmation Concentration (Confirmed Test Levels) ng/ml
Cannabis	4	2

* A ng/ml means nanograms per milliliter. A nanogram is one billionth of a gram, a milliliter is one thousandth of a liter.

- In the case of a verified positive test result; of a urine test conducted in accordance with this Standard; the person who has been tested may request the MRO to direct the split sample to be tested by an accredited laboratory of that person's choice within seventytwo (72) hours of receiving their results. Where split samples are not collected, the donor can request that their original sample be reanalyzed.
- A positive test result may be considered a violation of this Standard, whether or not the drugs or alcoholic beverage were actually consumed on company business, premises, or worksites. Failures to report directly for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to management or an attempt to tamper with a test sample may be violations of the Standard.
- All test results for individuals directed for testing by an EPCOR representative using the EPCOR testing system will be reported directly to the Company's Program Administrator or designate, who will communicate the result to the contractor. Contractors using independent testing facilities will be expected to advise EPCOR site management whether any individual under their direction is in violation of this Standard, or any agreement of continued assignment.

Current versions of controlled documents are posted on the EPCOR intranet. Versions obtained from other locations are considered uncontrolled. It is the user's responsibility to verify that this is the current version.

PRINTED COPIES OF THIS DOCUMENT ARE VALID FOR 24 HOURS.