

SUBSTANCE ABUSE COMPANY POLICY SHEQ-02

REV. 00

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The Waste Trade Company is committed to continual improvement of our Safety, Health, Environment and Quality (SHEQ) performance. We will conduct regular reviews of our systems to ensure its effectiveness and to drive continual improvement. This Policy will be communicated to all staff, sub-contractors and suppliers, and be available for the public.

Policy brief & purpose

The premise of the Company's approach to substance abuse and particularly testing positive for alcohol at the workplace is that of ZERO TOLERANCE. Safeguards against drug and alcohol abuse to ensure a safe and healthy working environment have been put in place via test kits and training sessions for employees.

Substance abuse imposes a burden on those caught up in the abuse, as well as their co-workers. It may lead to poorer job performance and accident risks. Employees voluntarily requesting assistance with prohibited substance abuse will be assisted by the Company via public rehabilitation programs.

To mitigate these risks, we have developed this substance abuse policy to prohibit the use, possession or sale of drugs on company premises and strictly regulate the consumption of alcohol.

Scope

All employees, contractors and part-time employees should abide by the provisions of this policy.

Policy elements

Illegal drugs, inhalants, prescription as well as over-the-counter drugs and alcohol consumption fall into the "substances" category.

While working, you are prohibited from:

- The consumption, possession, distribution and/or use of prohibited substances.
- The selling, buying, transfer, distribution of alcohol, drugs and/or alcohol or drug paraphernalia.
- Testing positive for the presence of any prohibited substances in your system.

To prevent accidents and productivity losses, drug and alcohol tests for employees, contractors and part-time employees when:

- There are reasonable grounds for suspecting that they may have a prohibited substance in their system and are at work
- The circumstances surrounding a workplace accident are unclear and we want to ensure there was no substance abuse involved.
- Client and/or contractual requirements require our employees to undergo a mandatory drug and/or alcoholtest.

Disciplinary Consequences

We may invoke disciplinary action up to termination, when you:

- · Test positive for hard drugs (e.g. cocaine.) and alcohol
- · Sell, or attempt to sell, any form of substance.
- Use any kind of substance on company premises.
- · Refuse to take company mandated drug or breathalyser test.

Managers will decide on the appropriate disciplinary action depending on the circumstances.

Approved

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