



CpK Interior Products INC.

POLICY- DRUG AND ALCOHOL-FREE WORKPLACE

1. APPLICATION

This Drug and Alcohol-Free Workplace Policy (the “**Policy**”) applies to all CpK Interior Products Inc. and affiliated companies (the “**Company**”) employees, contractors, agents and any other persons on the Company’s premises.

2. DEFINITIONS AND PURPOSE

2.1. For the purposes of this Policy:

2.1.1. A “drug” is any substance (whether natural or synthetic) that, when inhaled, injected, inserted, smoked, consumed, absorbed on the skin, swallowed, dissolved in the mouth or elsewhere in the body, or otherwise ingested causes a physical, physiological or psychological change in the body that affects or impairs an individual’s ability to function, or reduces an individual’s ability to react or respond to situations. It specifically includes both legal and illegal substances, and includes all drugs, whether or not medically required, and whether or not used in accordance with a prescription or instructions from a medical practitioner or otherwise.

2.1.2. A drug is “medically required” when it has been lawfully prescribed by, or taken under the advice and supervision of, a regulated health professional (e.g. licensed physician). In the case of cannabis, a drug is “medically required” if a person is authorized to possess cannabis for the person’s own medical purposes in accordance with applicable federal and provincial law. Where an individual asserts that a drug is medically required, the Company reserves the right to request satisfactory medical documentation to verify that the drug is medically required.

2.1.3. “On Company premises” includes Company-sponsored events.

2.2. The purpose of this Policy is to achieve three objectives.

2.2.1. First, the Policy reflects the Company’s commitment to the safety of all employees, contractors, agents and any other persons on the Company’s premises by having clear expectations in place regarding impairment due to the use of alcohol or drugs, and the prohibition on the use and possession of alcohol and drugs in the workplace.



2.2.2. Second, the Policy reflects the employees' responsibility to report to work fit for duty and remain fit for duty for the entirety of his/her shift, and, where required and as appropriate, the Company's obligation to assist and accommodate employees who seek rehabilitation for drug or alcohol dependency.

2.2.3. Third, the Policy informs employees, contractors, agents and any other persons on the Company premises that the Company is a safety-sensitive environment, and as such, all individuals are required to refrain from conduct that is prohibited by this Policy.

3. POLICY STATEMENT

3.1. The use of drugs or alcohol can adversely affect safety, job performance, morale, the work environment, and can place the integrity of the Company's operations and the safety of individuals at risk. In certain circumstances, the use of alcohol or drugs has lasting effects beyond what an individual may believe or expect.

3.2. Recognizing that every person has the right to a safe workplace, it is the responsibility of every employee, contractor, agent and any other person on the Company premises to arrive at work fit for duty and to conduct him/herself in a safe and lawful manner while at work on Company premises. Whether an employee consumes a drug because it is medically required or consumes a drug or alcohol for recreational use, it is the employee's responsibility to ensure that the drug or alcohol does not result in the individual being impaired at work or on Company premises at any time.

3.3. In order to maintain a safe and productive work environment, the Company takes a zero-tolerance approach to the:

- (a) use of drugs and alcohol;
- (b) possession of drugs and alcohol; and
- (c) impairment due to drugs and alcohol

while at work or on Company premises. This is subject only to the Company's obligation to accommodate employees with disabilities (including by use of prescription drugs) up to the point of undue hardship.



- 3.4. The following conduct is not permitted on Company premises or during working time, except where required under the Company's obligation to accommodate employees with disabilities (including by use of prescription drugs) up to the point of undue hardship:
 - 3.4.1. Possessing, consuming, or using alcohol or any drug.
 - 3.4.2. Distributing, offering, purchasing or selling any drugs, drug paraphernalia or alcohol.
 - 3.4.3. Smoking or holding lit cannabis (whether it is medically required or otherwise), or using an electronic smoking/vapor device.
 - 3.4.4. Being unfit for duty because of the use, consumption or impairment by alcohol or drugs of any kind (including a prescription drug).
- 3.5. This Policy respects the dignity and confidentiality of individuals who have an alcohol or drug dependency. The Company will reasonably assist and where required accommodate employees who voluntarily disclose an alcohol or drug dependency.
- 3.6. There is a shared responsibility in addressing the issue of alcohol and/or drug use in the interests of health and safety:
 - 3.6.1. Everyone working for the Company is personally responsible for compliance with this Policy and is expected to place a priority on workplace safety in the performance of his/her duties.
 - 3.6.2. An employee who witnesses an incident that causes him/her to have concerns about a co-worker's fitness for duty, or who otherwise becomes aware of conduct by another employee that is contrary to this Policy, must immediately inform his/her Supervisor, a member of management, or Human Resources.
 - 3.6.3. Any individual who is engaged in the use of alcohol and/or drugs is expected to consult with his/her treating physician (where appropriate) and any other qualified consultant or specialist to ensure that the substance will not impair his/her ability to work, and to report any drug or alcohol use that causes or may cause impairment while working. In the event a drug is medically required and must be taken during working hours or may cause impairment while working, the individual is required to consult with his/her doctor to ensure that the substance will not impair his/her ability to work safely, and to report any such drug use to the Company. The Company may direct employees to report to the Company medical department for evaluation and ensure compliance with the objectives of



this Policy. The Company medical department, in consultation with an individual's treating physician (where appropriate) and any other qualified consultant or specialist, may evaluate the individual's use of the drug to ensure compliance with the objectives of this Policy.

- 3.6.4. Employees are afforded counseling and treatment services available through the Employee Assistance Program (EAP), other licensed facilities or community support services authorized to provide treatment for alcohol and drug dependencies.
- 3.6.5. The Company will support this Policy and its implementation while respecting the dignity and confidentiality of the individual.
- 3.7. Quality, excellence and safe operations cannot be maintained where job performance is adversely affected or workplace or public safety is at risk due to the use of alcohol and/or drugs. Therefore, the Company:
 - 3.7.1. Expects all employees, contractors, agents and any other persons on the Company premises to abstain from the consumption of alcohol and drugs during regular or overtime working hours (including breaks and lunch periods), or any periods where the employee may be required to work.
 - 3.7.2. Expects employees contractors, agents and any other persons on the Company premises to inform their Supervisor, or Human Resources, about the use of any drugs that may impair performance or compromise personal or public safety. The Company will maintain confidentiality to the greatest extent possible, and will comply with its obligation to accommodate such individuals.
 - 3.7.3. Will actively promote a safe and healthy working environment.
 - 3.7.4. Will take appropriate action, based on the circumstances and subject to the applicable provisions of any collective agreement, which may include discipline up to and including termination in circumstances of impaired driving charges that may affect an individual's ability to come to work or operate Company vehicles or equipment.
 - 3.7.5. Will advise individuals working on Company property of the applicable provisions of this Policy, and in particular the expectations around fitness for duty and alcohol and drug use or possession, and will be expected to enforce these requirements for their employees, sub-contractors and agents. Any contravention of this Policy will be considered a breach of their contract and may result in penalties, suspension or removal of the individual involved from Company property or worksite, or termination of the contract.



- 3.8. Management is expected to:
 - 3.8.1. Communicate this Policy to employees and to ensure it is communicated to all contractors, agents and any other persons on the Company premises.
 - 3.8.2. Identify any situation that may cause concern regarding an employee's ability to safely perform his/her job functions.
 - 3.8.3. Provide accommodations where required for employees who report that they are taking medically required drugs.
- 3.9. Employees, contractors, agents and any other persons on the Company premises are required to:
 - 3.9.1. Abide by the provisions of this Policy.
 - 3.9.2. Identify and report to management, Human Resources, or a Supervisor any suspected violation of this Policy.
 - 3.9.3. Advise his/her employer if they have a drug or alcohol dependency. Employees are also encouraged to use counselling and treatment services available to them through the Company to assist with any drug or alcohol dependency. Employees will not be disciplined solely as a result of seeking help to overcome a drug or alcohol dependency.
 - 3.9.4. Consult and communicate with his/her doctor if they are using any drugs to ensure that the drugs will not impair his/her ability to work. If the use of any drugs is medically required, the Company will provide any required accommodation.

4. DRUG AND ALCOHOL TESTING

- 4.1. The Company will only conduct drug or alcohol testing in the following circumstances:
 - 4.1.1. Reasonable Cause Testing – Testing when reasonable cause exists to suspect a violation of this Policy. Reasonable cause includes, but is not limited to, instances where alcohol, drugs or drug paraphernalia have been detected on Company premises in a location which can reasonably be associated with a particular individual, where there are observable signs of impairment of an individual's ability to perform, or where reasonable grounds exist to suspect that the individual is under the influence of alcohol or drugs.



4.1.2. Post-Incident Testing – Testing of an individual when an act or omission of that individual could have been a contributing factor to a workplace incident or accident or a “near miss.”

4.1.3. Post-Violation of this Policy - Testing of an individual when an individual has violated a term of this Policy

5. VIOLATIONS OF THIS POLICY

5.1. Any individual who violates this Policy shall be subject to discipline, up to and including termination.

5.2. Individuals will not be disciplined for making a voluntary disclosure of a dependency on drugs or alcohol or the use of a medically required drug, unless the Company has already commenced an investigation into a potential violation of this Policy at the time such disclosure is made.

6. AMENDMENTS

6.1. The Company reserves the right to amend, replace or revoke this Policy at anytime.

Scope:

This Policy applies to all components of CpK Interior Products Inc. and FCA Canada Inc.

Sponsored by:

Environmental Health & Safety

Related Policy Statements:

40-2 – FCA Canada Health & Safety Policy

Approved by:

FCA Canada Board of Directors, October 2018