

# Health & Safety Guidance

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1.2	Updated Post-Incident/Near Miss testing criteria. Added effective date to cover page and added revision history.

For interim version details see revision history table.

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# 1 Purpose and scope

Cenovus is committed to providing a safe and healthy workplace. The use of alcohol, drugs, and certain medications may have serious adverse effects on job performance, health and safety, and the well-being of others. It can also place the integrity and safety of Cenovus's operations at risk.

# 2 Application

To support our commitment to safe operations and the safety and well-being of our workforce, Cenovus has prepared this Guideline to provide further direction to all contractors and suppliers regarding Cenovus's expectations associated with alcohol, drugs, and medication.

In the event of any inconsistency between this Guideline and Cenovus's Fit for Duty Policy, Alcohol and Drug Standard, or Alcohol and Drug Testing Procedure (collectively, the "A&D Program"), the Fit for Duty Policy, Alcohol and Drug Standard and Alcohol and Drug Testing Procedure will prevail.

# 3 Responsibilities

Contractors and suppliers must develop and enforce alcohol and drug policies and procedures that comply with applicable laws, Cenovus policies and industry standards and that meet or exceed Cenovus's A&D Program.

This includes ensuring that their workers are fit for duty and free of alcohol, drugs, or medications which may cause impairment, while engaged in Cenovus business, while on Cenovus premises, when on call, when assisting with an emergency or when operating Cenovus vehicles and equipment.

Contractors and Suppliers must:

- adhere to the Fit for Duty Policy
- report fit for duty and remain fit for duty throughout their workday or shift
- review and be familiar with Cenovus's A&D Program
- ensure that their workers performing services for Cenovus, or while present on company premises, are aware of and in compliance with the requirements of Cenovus's policies, including the A&D Program
- actively promote a safe and healthy work environment that strives to eliminate any negative effects due to the inappropriate use of alcohol, drugs, or medication
- inform Cenovus if they are unable to perform any services due to the influence of alcohol, drugs, or medications, or otherwise in a condition that could impact their fitness for duty
- take appropriate action if there is suspected or reported alcohol, drug or medication use by one of their workers or if a worker appears to be not fit for duty
- upon request by Cenovus, provide proof of the existence of and compliance with an alcohol and drug program
- conduct pre-assignment and pre-employment testing for all workers in safety sensitive positions that will be conducting work on Cenovus premises
- cooperate with an investigation into any violation, including any testing requirements
- cooperate where Cenovus exercises any right of audit pursuant to the applicable service agreement

- report to a leader, Cenovus representative, on-site medical staff, Enterprise Security, or Health & Safety representative if there are reasonable grounds to believe that someone is unfit for duty
- comply with searches
- report concerns that do not require immediate action to the Integrity Helpline or the Investigations Committee

## 4 Applicable rules

### 4.1 Substances

Contractors and suppliers while engaged in company business, working on or off company premises, when driving company vehicles, when assisting in an emergency, or when on call, are prohibited from:

- possessing, distributing, transporting, offering for sale, using, or consuming drugs or drug paraphernalia
- unauthorized possession, distribution, transportation or offering for sale of alcohol
- possessing, distributing, transporting, or consuming any cannabis product or any product containing alcohol while working in a safety sensitive position, or while present at a remote or dry site
- possessing or using any product or device that could tamper with any sample for an alcohol or drug test
- reporting for work or working:
  - with an alcohol or drug level equal to or greater than the concentrations set out in the testing requirements
  - while not fit for duty due to the use of alcohol or drugs

Where permitted, workers may consume alcohol when they have left a site; however, they must return to site fit for duty.

### 4.2 Medications

Cenovus requires the following for the possession or use of medication. Contractors and Suppliers must:

- not offer for sale any medication or use any medications other than permitted
- consult their healthcare professional if there is any doubt as to whether use of a prescription or non-prescription medication could affect their fitness for duty. The medication must not adversely affect the worker's ability to safely perform their duties
- notify their leader, Cenovus representative or Cenovus occupational health professional before starting work, if they are taking any medication that may affect their fitness for duty or otherwise affect their ability to perform their duties
- only use or possess prescription medication prescribed to themselves and use the medication for its intended purpose
- not report for work or work while not fit for duty due to the use of medication

Consumption and transportation of medication may be subjected to additional company, site-specific or local bylaw requirements.

## 4.3 Driving charges

In addition to developing and enforcing their own alcohol and drug policies and procedures that meet or exceed Cenovus's A&D Program, including with respect to impaired driving, contractors and suppliers must promptly (within 24 hours of the occurrence) report to Cenovus any impaired driving situations that could affect their work for Cenovus, including:

- impaired driving charge,
- temporary loss or suspension of a driver's license for any reason, including as a result of any impaired driving charge, administrative driver's license suspension, road-side screening or otherwise,
- impaired driving conviction
- loss of license for any reason, including due to an impaired driving (or related offence) conviction

If a worker receives a charge or sanction while operating a company vehicle or while driving on behalf of Cenovus, Cenovus must be informed promptly and there may be an investigation undertaken. Action taken will be appropriate to the situation, up to and including termination of a service agreement.

The following may also result in termination of a service agreement:

- any loss of the license, where holding a valid driver's license is a condition of the contract; and
- failure to report a charge, conviction, or a loss or suspension of license

## 5 Testing

Cenovus requires the supplier to conduct pre-assignment, post-incident or near miss testing, or reasonable grounds testing of the contractor and supplier personnel. Contractors and suppliers shall ensure that its personnel comply with any request for testing made by Cenovus in accordance with the A&D Program.

The contractor or supplier is expected to:

- have testing conducted at an accredited 3rd party testing facility
- transport their employee to the testing facility within the timeframes noted under Timeframes below
- provide Cenovus with a fitness for duty notification/results for any test situation

Refusing to comply with testing requirements is considered a non-compliance with Cenovus's A&D Program. This includes engaging in any conduct which obstructs the testing process, including:

- failure to report or attempt to delay reporting for a test
- refusal to submit to a test
- refusal to agree to disclosure of a test result to Cenovus
- tampering with or altering any testing sample

Workers subject to testing must be immediately removed from duty, and may also be removed from company premises and/or have access suspended pending the alcohol and drug test results and any other fit for duty related inquiries made by Cenovus or the worker’s employer. The contractor or supplier will be informed that their worker is subject to testing. Cenovus will request the contractor or supplier to arrange testing in accordance with the timelines, and to meet the standards of the Alcohol and Testing Procedure. Depending on the test result, a fitness for duty assessment may also be required before allowing the worker to return to work.

## 5.1 Timeframes

Collection and administration of alcohol and drug tests must be performed by trained collection agents. Samples for **alcohol tests must be collected within 2 hours of the event, and drug test within 12 hours of the event.** If the alcohol test is not conducted within 2 hours, the employer should continue to make an effort to have the employee tested for up to 8 hours and prepare and maintain, on file, a record of why the test was not administered within the 2-hour timeframe.

If a worker requires immediate medical attention, alcohol and drug testing may occur at the discretion of the medical service provider at the time of treatment. Once discharged from the medical facility, alcohol and drug testing can be conducted in accordance with this guideline and respecting the applicable timeframes.

## 5.2 Criteria

A **positive alcohol test** is one in which the blood-alcohol content is defined as follows:

**Table 1: Positive alcohol test results**

<b>Safety Sensitive Positions</b>
<i>&gt;= 0.02 grams/210 litres of breath</i>
<b>All Other Positions</b>
<i>&gt;= 0.040 grams/210 litres of breath</i>

A **positive drug test** is one in which the amount of drug confirmed in a sample is at or exceeds the cut-off limits; the cut-off limits are as follows:

**Table 2: Positive drug test results**

<b>Drug</b>	<b>Initial Test Levels (ng/ml)*</b>	<b>Confirmation Test Levels (ng/ml)*</b>
Marijuana Metabolites	50	15
Cocaine Metabolites	150	100
<b>Opioid Metabolites</b>		
Codeine	2000	2000
Morphine	2000	2000
Hydrocodone	300	100
Hydromorphone	300	100
Oxycodone	100	100
Oxymorphone	100	100

Drug	Initial Test Levels (ng/ml)*	Confirmation Test Levels (ng/ml)*
Fentanyl	20	2
6-Acetylmorphine	10	10
Phencyclidine (PCP)	25	25
Amphetamines	500	--
Amphetamine	--	250
Methamphetamine	--	250
MDMA <sup>1</sup>	500	250
MDA <sup>2</sup>	--	250

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

1. Methylendioxyamphetamine
2. Methylendioxyamphetamine

Drug screening is completed using a 10 panel + Fentanyl. The 10 panel is based on the US Department of Transportation and the Canadian Model for providing a safe workplace. In certain situations, the testing program may include other drugs at the direction of Cenovus.

## 5.3 Testing circumstances

### 5.3.1 Pre-assignment/Pre-employment

The contractor or supplier’s workers within safety sensitive positions, must pass a pre-assignment/pre-employment alcohol and drug test as a condition of work in that position for Cenovus, whether as a condition of hire with their employer or as a result of a change from a non-safety sensitive to a safety sensitive position.

Any contractor or supplier’s workers re-hired after a break in service with their employer of greater than 90 days are also required to be retested prior to commencing a safety sensitive position at Cenovus.

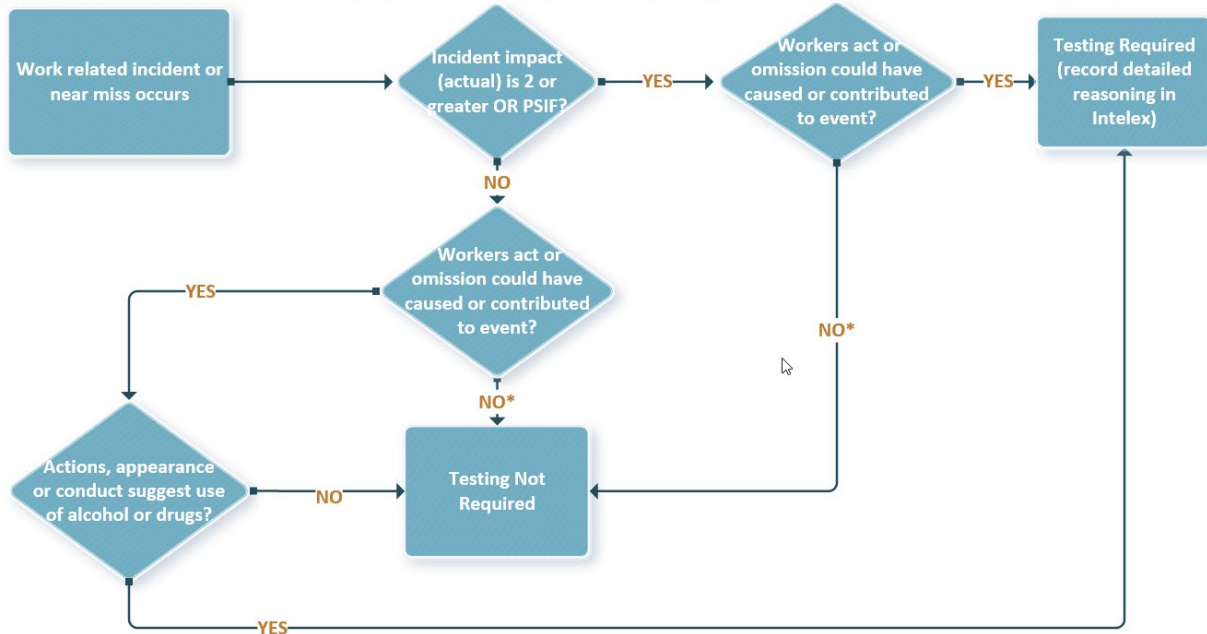
Suppliers must be able to provide Cenovus upon request with verification of the completion of pre-assignment/pre-employment assessments for all workers that they intend to send to Cenovus.

Cenovus also retains the right to request site access testing as needed for specific sites or projects.

### 5.3.2 Post-incident

Post-incident or near miss testing may be required on safety sensitive positions as part of a full investigation into a work-related incident or near miss. Testing is required unless it has been determined by the employer, the Cenovus leader, and the Cenovus safety representative investigating the incident or near miss that the individual’s actions or omissions are unlikely to have contributed to the occurrence.

During the investigation into a work-related incident, the employer, the Cenovus leader, and the Cenovus H&S representative determine whether the incident meets alcohol and drug testing criteria using the flowchart in Figure 1 below:



\* i.e., Acts of God/ certain type of mechanical failure /spills / releases

Figure 1: Post-Incident or near miss testing determination flow chart

**Act:** to take action; do something, behave in the way specified or reasonably expected.

**Omission:** The act, fact, or state of leaving something out or failing to do something that is reasonably expected, especially that is required by duty, procedure, or law.

**Act of God:** Typically used to depict an Incident which occurred as a result of natural causes, directly and exclusively, without human intervention. Such an incident could not have been prevented by any amount of foresight, planning and care reasonably to be expected of any employee or worker. Depending on the circumstances, examples include lightning, storms, flood, wind velocity, earthquakes, sudden death or illness, naturally occurring extreme heat and humidity conditions.



IMPACT	HEALTH & SAFETY	ENVIRONMENT & REGULATORY	PRODUCTIVE ASSETS	FINANCIAL <sup>1</sup>	REPUTATION
<b>Catastrophic</b>  5	<ul style="list-style-type: none"> <li>Multiple fatalities</li> <li>Community evacuation</li> </ul>	<ul style="list-style-type: none"> <li>Off-lease impact on soil or groundwater</li> <li>Remediation for &gt;20 years</li> <li>Multi-year impact on flowing/moving water</li> <li>Full regulatory suspension of a major facility</li> </ul>	<ul style="list-style-type: none"> <li>Production loss of a major facility for &gt;3 months or annualized equivalent</li> <li>&gt;\$100MM business interruption impact at a minor facility</li> </ul>	>\$100MM	<ul style="list-style-type: none"> <li>Material market capitalization impact</li> <li>Influential stakeholder concerns lead to resource sterilization</li> <li>Officer convicted of an offense</li> </ul>
<b>Critical</b>  4	<ul style="list-style-type: none"> <li>Fatality</li> <li>Public shelter-in-place notification</li> </ul>	<ul style="list-style-type: none"> <li>Off-lease impact on soil or groundwater</li> <li>Remediation for 10-20 years</li> <li>Partial regulatory suspension of a major facility, or full suspension of a minor facility</li> <li>Extended emissions limit exceedance &gt;1 year and/or potential long-term effect</li> </ul>	<ul style="list-style-type: none"> <li>Production loss of a major facility for 5 weeks - 3 months or annualized equivalent</li> <li>\$10MM-\$100MM business interruption impact at a minor facility</li> </ul>	\$10MM-\$100MM	<ul style="list-style-type: none"> <li>Influential stakeholder concerns lead to interruption of operations</li> <li>Prolonged negative attention</li> </ul>
<b>Major</b>  3	<ul style="list-style-type: none"> <li>Injury/illness that causes permanent disability or significant life-altering complications</li> <li>Site evacuation</li> </ul>	<ul style="list-style-type: none"> <li>On-lease impact on soil or groundwater; potential to extend beyond lease</li> <li>Remediation for 5-10 years</li> <li>Partial regulatory suspension of a minor facility</li> <li>Repeated emissions limit exceedance for 3 months - 1 year</li> </ul>	<ul style="list-style-type: none"> <li>Production loss of a major facility for 2.5-5 weeks or annualized equivalent</li> <li>\$1MM-\$10MM business interruption impact at a minor facility</li> </ul>	\$1MM-\$10MM	<ul style="list-style-type: none"> <li>Influential stakeholders voice concerns publicly</li> <li>Wide-spread negative attention</li> </ul>
<b>Moderate</b>  2	<ul style="list-style-type: none"> <li>Medical treatment, restricted work, or hospitalization</li> <li>Site shelter-in-place</li> </ul>	<ul style="list-style-type: none"> <li>Impact contained on lease</li> <li>Remediation for &lt;5 years</li> <li>Formal disclosure of non-compliance to a regulator</li> <li>A single emissions limit exceedance</li> </ul>	<ul style="list-style-type: none"> <li>Production loss of a major facility for 1-2.5 weeks or annualized equivalent</li> <li>\$100K-\$1MM business interruption impact at a minor facility</li> </ul>	\$100K-\$1MM	<ul style="list-style-type: none"> <li>Multiple stakeholders voice concerns directly to Cenovus</li> <li>Regionalized negative attention</li> </ul>
<b>Minor</b>  1	<ul style="list-style-type: none"> <li>Minor injury requiring first aid</li> </ul>	<ul style="list-style-type: none"> <li>Impact contained on lease</li> <li>Remediation possible &lt;1 month</li> <li>Internally reportable</li> </ul>	<ul style="list-style-type: none"> <li>Production loss of a major facility for &lt;1 week or annualized equivalent</li> <li>&lt;\$100K business interruption impact at a minor facility</li> </ul>	<\$100K	<ul style="list-style-type: none"> <li>Single stakeholder complaint</li> <li>Minimal negative attention</li> </ul>

**Figure 2: Cenovus risk matrix impact estimation tool**

### 5.3.3 Reasonable grounds

Reasonable grounds testing is conducted when a safety sensitive worker’s actions, appearance or conduct while engaged in Company business, working on or off Company premises, when driving Company vehicles, when on call and when assisting with an emergency give reasonable grounds to suspect the consumption or use of alcohol, drugs, or certain medications. When there are reasonable grounds to believe that a contractor or supplier worker is not fit for duty, the worker’s employer will be informed that there are reasonable grounds to believe that their worker is not fit for duty and Cenovus will request the supplier to arrange testing in accordance with the timelines and requirements of the Alcohol and Drug Testing Procedure.

Referral of an individual for testing will be based on personal observations. Examples of reasonable grounds may include, but are not limited to:

- direct visual observation of a policy violation
- detection of possible presence of contraband
- direct visual observation of physical or behavioural signs (e.g., difficulty in maintaining coordination, slurred speech, smell of alcohol on breath, extreme drowsiness)
- statements by the worker that suggest potential violation of the Fit for Duty Policy or the Alcohol & Drug Standard
- pattern of failure to follow safety rules or operating procedures

The Supplier must retain records of a completed Alcohol and Drug Testing Rationale Form or its equivalent for a period of at least 2 years.

### 5.3.4 Searches

Cenovus reserves the right as a condition of entry onto Cenovus’s premises to conduct unannounced searches or inspections to the extent necessary to ensure compliance with its Fit for Duty Policy and its related standards and procedures (A&D program).

Searches may be random or with reasonable cause and can be conducted on corporate property, personal property, equipment, vehicles, and other items on Cenovus premises. Workers or visitors may or may not be present at the time of the search. Refusal to comply with or grant a search is a violation of the A&D Program.

Contractor or supplier personnel found in possession of any contraband or other items prohibited by Cenovus’s Search Procedure, or otherwise in violation of the A&D Program, will be denied access to or removed from company premises.

## 5.4 Removal from and return to site/work

Any worker acting in contravention of the A&D Program may be denied access to or be removed from Cenovus’s premises.

A discussion between the contractor or supplier and Cenovus must take place prior to returning a worker who has been removed from a Cenovus work site due to a fit for duty related event.

Upon request from Cenovus, a contractor or supplier must provide assurance that any return-to-work plan has been completed satisfactorily.

## 6 References

**Table 3: References**

Document title or link	Relevance
Alcohol and Drug Standard	Corporate Standard
Alcohol & Drug Testing Procedure	Corporate Procedure
Fit for Duty Policy	Corporate Policy
HSE Schedule	Cenovus health, safety and environmental requirements (schedules) for suppliers

## Revision history

**Table 4: Revision history**

Version	Date	Description
1.0	September 13, 2022	Issued for use
1.1	December 7, 2022	Changes unknown
1.2	March 21, 2024	Updated Post-Incident/Near Miss testing criteria. Added effective date to cover page and added revision history.