

# Alcohol & Drug Standard

## Owner: Vice-President, Safety & Risk

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## Purpose

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. To support our commitment to safe operations and the safety and well-being of our workforce, Cenovus has put in place this Standard to address our expectations associated with the use and/or misuse of alcohol, drugs and medication on work performance, conduct and safety.

## Scope

This Standard and its related policies and procedures (collectively "A & D Program") apply to all staff when they are engaged in company business, working on or off company premises, when driving company vehicles, when assisting in an emergency, or when on call.

This Standard applies to all of Cenovus's activities that are applicable to its operations in Canada. In all other jurisdictions, Cenovus complies with the applicable laws and may develop a policy or standard where appropriate.

Cenovus's suppliers are expected to comply with applicable laws, Cenovus policies and industry standards, and to develop and enforce alcohol and drug policies and procedures that meet or exceed Cenovus's A&D Program. More information regarding the application of Cenovus's A&D Program for contractors and suppliers can be found in the Contractor and Supplier Alcohol & Drug Guideline.

## Roles and responsibilities

### Staff

- Recognize and prevent the inappropriate use of alcohol, drugs and medication.
- Read, understand and comply with the A&D Program and take all related training.
- Report and remain fit for duty at the start of and throughout the work period.
- Disclose and take responsibility for resolving personal alcohol or drug problems.
- Cooperate with any investigation into any actual or suspected violation of the A&D Program.
- Take reasonable care so as not to expose themselves or others to unnecessary health or safety risks.

### Leaders

- Understand the A&D Program, their responsibilities within it, and apply this Standard in a fair and consistent manner.
- 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
- Ensure individuals in their area of responsibility understand and comply with the requirements of the A&D Program.
- Recognize the effects of alcohol, drugs and medications in the workplace, monitor worker performance, and take action regarding any violations or suspected violations of Cenovus's A&D Program.

- Regularly monitor workers' fitness for duty. Field leaders should use the Field leaders fit for duty Guide or other applicable resources to assist in monitoring and addressing fitness for duty issues, including implementing the A&D Program and taking prompt and appropriate action whenever they believe a worker is not fit for duty.
- Refer employees to appropriate company resources when they ask for help in dealing with personal concerns, or as otherwise appropriate, including ensuring employees are aware of the Employee and Family Assistance Program (EFAP).
- Maintain confidentiality when receiving information related to the A&D Program in compliance with the Privacy Policy and Employee Privacy Standard.
- Report any violations or suspected violations in accordance with the A&D Program.
- When alcohol and drug tests are required, follow the Alcohol & Drug Testing Procedure to arrange for testing.
- Allocate and make available the necessary financial and human resources that are required to meet Cenovus's A&D Program expectations.

### Health & Safety (H&S)

- Oversee the A&D Program, including training and awareness as appropriate.
- Review and modify the A&D Program as necessary to respond to current circumstances and evolving needs.
- Assist leaders as needed in monitoring compliance of workers in safety sensitive positions.
- Coordinate, conduct or participate in incident investigations with due consideration of potential alcohol and drug impairment.

### Enterprise Security

- Manage searches, including alcohol, drug and other contraband searches, in accordance with the Search Procedure.
- Deliver education and awareness sessions on contraband identification and handling suspicious substances.
- Manage access restrictions for workers who are prohibited from attending company premises as a result of violations of the A&D Program.
- Maintain confidentiality when receiving information related to the A&D Program in compliance with the Privacy Policy and Employee Privacy Standard.
- Participate in investigations where required.

### Human Resources (HR) or Human Resource Business Partner (HRBP)

- Consult with and provide guidance to leaders on disciplinary actions for employees for violations of the A&D Program.
- Communicate to individuals offered safety-sensitive positions the associated medical requirements including pre-assignment alcohol & drug testing.
- Act as a resource to leaders and employees as set out in this Standard.
- Provide guidance for the designation of safety sensitive positions.

### Disability Management

- Oversee employee treatment, monitoring and return-to-work programs.
- Act as a resource to leaders and employees as set out in this Standard.
- Maintain confidentiality when receiving information related to A&D Program in compliance with the Privacy Policy and Employee Privacy Standard.
- Offer consultation services to employees who seek assistance with alcohol, drug and/or medication concerns.

## Occupational Health

- Oversee interpretation and communication of employee alcohol and drug testing results.
- Perform duties of the company testing administrator including liaising with the substance abuse expert for employees.
- Support delivery of alcohol and drug awareness presentations.
- Maintain confidentiality when receiving information related to A&D Program in compliance with the Privacy Policy and Employee Privacy Standard.
- Offer consultation services to employees who seek assistance with prescription and/or non-prescription medication impacts.

## Legal

- Provide guidance as needed on the interpretation and application of the A&D Program, including consequences for non-compliance.
- Assist with reviewing and modifying the A&D Program as needed.

# Standard statements

## Substances and applicable rules

Staff must report fit for duty and remain fit for duty while engaged in company business, while on company premises, when driving company vehicles, when assisting with an emergency or when on call.

Staff, while engaged in company business, while on company premises, when driving company vehicles, when on call, or when assisting with an emergency, 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 Alcohol & Drug Testing Procedure.
  - While not fit for duty due to the use of alcohol, drugs, or medication.

Staff must inform visitors of the requirements of the Standard prior to their attendance and accompany visitors while on company premises.

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

Any worker or visitor acting in contravention of the Standard may be denied access to or be removed from company premises.

## Possession or use of medication

Staff are expected to use medication responsibly and must not be unfit for duty due to the use of medication. Medication may only be used in accordance with this Standard, and then, only in accordance with the directions of either a health care professional or the medication manufacturer, as applicable.

Cenovus requires the following for the possession or use of medication. Staff must:

- Consult their health care 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 staff member'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 safely.
- Only use or possess prescription medications prescribed to themselves.
- Not offer for sale any medication or use any medications other than as permitted in this Standard.
- Use the medication for its intended purpose and in the manner directed by either their health care professional or the medication manufacturer, as applicable.
- Choose, where available, a safe alternative medication in preference to a medication that may affect the staff member's ability to safely perform their duties.

Where a worker reports a prescribed treatment or that they are taking medication which may cause them to be not fit for duty the company may require a medical note from the treating licensed physician. The physician must be familiar with the worker's medical history and specific duties and must certify that they are able to perform their duties without risk of injury or harm to themselves or others.

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

## **Duty to report**

Staff must immediately report to a leader, on-site medical staff, Enterprise Security, site-security, Health & Safety, or your HRBP any situation where there are reasonable grounds to believe that they or a co-worker is not fit for duty, including:

- The unauthorized possession or consumption of alcohol, drugs or medication.
- Any other actual or suspected breach of the A&D Program.

## **Work modifications**

Following self-disclosure in accordance with the duty to report under this Standard, an employee may be assigned to alternate duties, if available.

## **Unexpected call out**

If unexpected circumstances arise where staff are requested to perform unscheduled services while under the influence of alcohol, drugs, or medication, or in a condition that could impact their fitness for duty, the individual must declare the situation and decline the call out, without repercussions. This includes anyone who is on continuous standby (rather than scheduled on call).

## **Incidents and near misses**

After any incident or near miss, staff involved in the incident or near miss are prohibited from using alcohol or drugs for eight hours immediately following the incident, or until tested or advised by their leader or Cenovus representative that a test is not required. Staff are not prohibited from taking medications, provided that they are taken in compliance with this Standard, including as directed by a health care professional, and so long as the medication use is reported to their leader or occupational health before consumption where required in this Standard.

## Driving charges

Some charges or convictions may result in loss of driving privileges, including impaired driving. If driving is required in their job duties, staff must report to their leader any of the following incidents within 24 hours of the occurrence, and prior to operating any motor vehicle on behalf of Cenovus:

- 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 the company, there may be an investigation undertaken, and action taken will be appropriate to the situation, up to and including termination.

The following may also result in disciplinary action up to and including termination of employment for cause or termination of a service agreement:

- Any loss of the license, where holding a valid driver's license is a condition of employment or contract, as the worker may no longer be qualified for the position held.
- Failure to report a charge or conviction, or a loss or suspension of license.

## Support

The company recognizes that an individual's fitness for duty may be affected by a variety of factors, including fatigue, stress, alcohol, drugs or medication. This Standard and its related documents provides a framework for dealing with these issues, including assistance for individuals with situations which may otherwise place their and others' health and safety at risk.

Employees who are concerned that they are developing or may have a substance use or dependency problem with alcohol, drugs or medication must promptly advise Disability Management or their leader and follow any recommended treatment or after-care program as required by Cenovus. It is the employee's responsibility to seek assistance before performance problems or violations of this Standard lead to corrective action.

Disciplinary action cannot be avoided by post-incident or post-near miss disclosure by the employee that they have a substance use or dependency issue or are already involved in a treatment program. However, no employee with substance use or dependency problem will be disciplined for requesting help in overcoming their problem so long as they seek and access help before an incident or near miss occurs and before being notified that they must report for an alcohol or drug test under the Alcohol & Drug Testing Procedure, and so long as they comply with any return-to-work agreement required by Cenovus.

## Short-term disability

When required following substance use or dependency problem disclosure, Disability Management will make arrangements for the employee to be assessed. Cenovus will reasonably accommodate any disability in accordance with applicable law and Cenovus policies and standards. Employees under medical care and who are unable to work due to attendance at a recognized treatment program may qualify for short-term disability benefits. Employees must comply with the Disability Management Standard, and any prescribed treatment programs, including counseling and other assessments or programs as necessary to maintain eligibility for short-term disability benefits.

## Removal from and return to work

Where an employee has disclosed a substance use and/or dependency problem prior to an incident, near miss, and/or being directed to report for an alcohol or drug test, or in the opinion of Disability Management, Occupational Health or a qualified professional, there is a risk that an employee is not able to do their job safely, the employee will be removed from duty or placed in a modified non-safety sensitive position, at Cenovus's sole discretion, until Cenovus has received a fit for duty clearance from Disability Management.

Employees who receive assistance or treatment as a result of a substance use or dependency problem must comply with the terms and conditions of any treatment or rehabilitation program established as a condition of returning to work and as a condition of their continued employment with Cenovus.

Employees who complete a treatment program are subject to a return-to-work agreement and must comply with any terms and conditions of the return-to-work agreement in place between the employee and Cenovus, including return to work, and follow up unannounced alcohol and drug testing, and other recommendations as determined by a substance abuse expert.

Before returning to work the employee must receive a fit for duty clearance.

## Searches

Cenovus reserves the right as a condition of employment or as a condition of entry onto company premises to provide services, to conduct unannounced searches or inspections to the extent necessary to ensure compliance with its policies and standards. To detect, locate and mitigate drug, alcohol and other contraband possession, searches may be conducted on premises owned, contracted, or otherwise controlled by Cenovus, in accordance with the Search Procedure.

## Application of benefits

The A&D Program is not to be construed as creating any additional obligations of Cenovus to contractors or suppliers. Any reference to benefits afforded to employees, including access to resources through Disability Management, EFAP, work modifications, short-term disability or other health and wellness programs, are available to employees only. Any obligations or benefits owed by Cenovus to contractors or suppliers are strictly limited to those set out in written agreements between the parties.

## Testing

Alcohol and drug testing is one mechanism used to identify and control consumption of alcohol and use of drugs in the workplace. Workers must comply with all Cenovus testing directions, including the testing requirements set out in the Alcohol & Drug Testing Procedure.

Refusal to comply with testing requirements, engaging in conduct that obstructs the testing process, or a confirmed non-compliant test result is considered a violation of the A&D Program. For more details on the testing criteria and administration, see the Alcohol & Drug Testing Procedure.

## Exceptions

### Alcohol and business travel

Provided fit for duty requirements are maintained, staff who are not performing safety sensitive positions and not located where alcohol consumption is prohibited, such as in camps and at remote sites, are permitted to:

- Responsibly consume alcohol when on company business away from company premises (e.g. business travel, conference attendance).
- Responsibly consume alcohol on corporate and charter aircraft.

## Social events

Events where alcohol is served must comply with the Alcohol & Drug Standard, Workplace Violence & Harassment Prevention Standard and Fit for Duty Policy. Reasonable measures must be implemented by the event sponsor to ensure responsible consumption as follows:

- Attendees must be encouraged to drink responsibly (e.g. include appropriate messaging on event invitations and at the event)
- Food must be served
- Everyone must have unlimited access to complimentary non-alcoholic beverages
- Bar service staff must be instructed to discontinue alcohol service to anyone who appears to be impaired

Taxi chits or prearranged transportation (e.g. Uber, etc.) must be provided at any Cenovus event or meeting where alcohol is served, and must be offered to anyone attending the event, regardless of alcohol consumption.

Cannabis products must not be offered, provided, or consumed at Cenovus social events, whether on or off company premises.

## Company owned/provided residences

Alcohol is permitted in company owned/provided residences (e.g. Rainbow Lake) and at temporary residences. This exception does not apply to dry sites or camps.

## Confidentiality

Cenovus is committed to confidentiality in applying this Standard in accordance with Cenovus's Privacy Policy, Employee Privacy Standard, and applicable laws.

## Compliance and enforcement

### Monitoring

Health & Safety in conjunction with HR and Enterprise Security is responsible for monitoring compliance to this Standard and related processes through periodic reviews and assessments.

Incidents of non-compliance must be reported to a leader, Cenovus representative, your HRBP, Enterprise Security, Health & Safety, the Integrity Helpline, or the Investigations Committee.

### Consequences of non-compliance

Cenovus will investigate any suspected or confirmed violation of this Standard. A worker may be barred from engaging in company business or entering company premises while an investigation is being conducted. Violations of this Standard may result in disciplinary action, up to and including denial of site access or termination of employment or services agreement.

Where there is any inconsistency between this Standard and a related document, the higher standard will prevail.

## Support

Contact Health & Safety for any questions or concerns about this Standard.

## Related documents

- Fit for Duty Policy
  - Alcohol & Drug Testing Procedure
  - Field Leaders' Fit for Duty Guide
  - Contractor & Supplier Alcohol & Drug Guideline
  - Search Procedure
  - Safety Sensitive Position Standard
  - Work Health Standard
- Fleet Vehicle Standard
- Meetings & Events Standard
- Privacy Policy
  - Employee Privacy Standard
- Driving Standard

## Glossary

**Alcohol** – any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume and includes the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl, found in medicines or other products.

**A&D Program or Alcohol & Drug Program** – includes, but is not limited to, all documents and processes associated with managing alcohol & drugs at Cenovus, such as the Fit for Duty Policy, Alcohol & Drug Standard, Search Procedure, Alcohol & Drug Testing Procedure, and Life Saving Rules.

**Cannabis product** – means any product that includes tetrahydrocannabinol (THC) or cannabinoid (CBD) containing substances in ingestible, smoked, vaporized or any other form and includes edibles, extracts and concentrates and topical products such as lotions, creams, sprays, ointment, oils, gels and balms, and for greater certainty, includes synthetic marijuana.

**Company or Cenovus** – means Cenovus Energy Inc. and its Affiliates. **Affiliate** includes any company, person, partnership or other legal entity which controls or is controlled by Cenovus Energy Inc.

**Company business** – refers, but is not limited to, all business activities undertaken in the course of Cenovus's operations, whether conducted on or off company premises. It includes those situations when an employee is representing or could reasonably be perceived as representing Cenovus in the performance of their duties.

**Company premises** – includes, but is not necessarily restricted to, all land, property, camps, structures, buildings, Fixed Base Operations, installations, or any part thereof owned, leased, rented, operated or occupied by the company, as well as vehicles, aircraft, vessels and equipment owned, leased, rented, operated or otherwise directly controlled by Cenovus or used in the course of company business.

**Company Testing Administrator** – the person responsible for conducting testing under the Alcohol & Drug Testing Procedure.

**Contractor** – individuals who provide services related to day-to-day business, operations, or on a specific project of Cenovus or its subsidiaries through a contractual arrangement with a supplier, but who may be individually screened or selected, based on their particular knowledge, skills and capabilities. Services provided typically have an expected start and end date. The supplier engages with the individual as an employee or as a (sub)contractor, and, where applicable, is responsible for the employment relationship, including payroll, any benefits, and all applicable statutory remittances. The supplier also provides workers' compensation coverage, specified levels of insurance and may be responsible to ensure required training, certifications, and readiness-for-work are confirmed for the services.

**Drug or Drugs** – for the purposes of the A&D Program a drug includes any drug, substance, chemical or agent, the use or possession of which is unlawful in Canada, and also includes any otherwise legal but illicitly-used substances, including medications obtained without proper medical authorization or not used as indicated, any

cannabis products that are not medications, synthetic marijuana, synthetic forms of illegal substances (e.g. synthetic cocaine and amphetamine analogues, etc.) and other substances not being used for their intended purposes.

**Drug Paraphernalia** – Includes any personal property, equipment, product or accessory which is associated with or manufactured for the making, use, or concealment of any drug, or any item intended to mask or alter the outcome of an alcohol or drug test.

**Employee** – Individuals employed by Cenovus or its subsidiaries (collectively "Cenovus") and on Cenovus's payroll.

**Employee and Family Assistance Program or EFAP** – Cenovus's Employee and Family Assistance Program provides Cenovus employees and their families with confidential counseling on issues that affect well-being, health or work performance. Services are available for personal difficulties such as marital or family issues, stress management, alcohol/drug or other dependencies, bereavement and child or eldercare.

**Fit for duty or fitness for duty** – a state of physical and mental fitness to perform assigned duties competently and in a safe manner.

**Health care professional** – includes a duly qualified physician, pharmacist, dentist, etc. who may provide guidance on the implications of medication use.

**Impaired Driving** – includes but is not limited to operating a vehicle while performance is adversely affected by alcohol, drugs or medication, testing with a blood alcohol limit at or above established criteria in the applicable jurisdiction or site, or any other exceedance of the restrictions imposed under the *Criminal Code of Canada* or any municipal, provincial or territorial traffic safety laws, or site requirements, or refusing to blow into a breath analyzer or provide a sample for testing.

**Incident** - An event that results in an injury, illness, property damage or loss. Worker exposure events are considered incidents.

**Medical Review Officer or MRO** – A licensed physician certified as a Medical Review Officer who is independent of the company and who is responsible for receiving the laboratory report and reviewing any positive results with the employee to determine any alternative medical reasons for the result before reporting to the employer. The MRO makes the final decision on whether it is a verified positive, a verified refusal (adulterated or substituted) or a negative result.

**Medication** – both Prescription and Non-Prescription Medications.

**Near miss** – An event that had the potential to result in an injury, illness, property damage or loss, but did not.

**Non-Prescription Medications** – substances, chemicals, or agents used for medicinal purposes that can be lawfully purchased and consumed without a prescription.

**On Call** – Employees who have been designated as being on-call in accordance with a communicated schedule.

**Pre-assignment/placement** – Prior to starting a new safety sensitive position, whether that is the result of new employment, transfer, or reclassification of an existing position.

**Prescription Medication** – any substance, chemical or agent used for medicinal purposes that is obtained through a prescription from a health care professional. For the purposes of Cenovus's Alcohol & Drug Standard and all related documents, a "prescription" includes a medical authorization for medical cannabis.

**Safety-Sensitive Position** – As set out in the Safety Sensitive Position Standard

**Supplier (service provider)** – Individuals who provide services to Cenovus or its subsidiaries through a contractual arrangement with a supplier (e.g. HP, IBM, Accenture, Peter the Plantman, etc.) and are not typically screened or selected through any Cenovus recruitment process, but are assigned by the supplier. Services can be cyclical, seasonal, short or long-term. The supplier engages with the individual as an employee or as a (sub)contractor, and, where applicable, is responsible for the employment relationship, including payroll, any benefits, and all applicable statutory remittances. The supplier also provides workers' compensation coverage, specified levels of insurance and may be responsible to ensure required training, certifications, and readiness-for-work are confirmed for the services.

**Staff** – Individuals who conduct work and/or provide services for the benefit of Cenovus or its subsidiaries, including employees and contractors, but excluding suppliers.

**Substance Abuse Expert** – An individual with clinical knowledge and experience in the diagnosis and treatment of alcohol and drug-related disorders and certified as a Substance Abuse Expert.

**Testing Program Administrator** – A supplier engaged to:

- Manage sample collection
- Provide Medical Review Officer services
- Liaise with the company Testing Administrator
- Administer the selection process for unannounced testing in accordance with the Alcohol & Drug Standard, as well as the Alcohol & Drug Testing Procedure
- Select test days for those on a follow-up testing program
- **Visitor** – Someone attending on company premises on a temporary basis, who is not an employee or personnel of a supplier.
- **Workers** – Any or all people working on company premises, including union and non-union employees, contractors and supplier/service provider personnel.