

## **POLICY: SUBSTANCE ABUSE**

### **BACKGROUND**

The corporate Substance Abuse policy is established to facilitate the development of controls that will ensure that roles and responsibilities are clearly defined and understood in order to secure both corporate and individual compliance for Reverside regarding Substance Abuse, in order to keep all employees and Reverside premises and property safe. It is the intent of Reverside to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls where Substance Abuse is concerned. It should be noted that failure to comply with conduct and procedures relating to Substance Abuse falls under Misconduct in the Disciplinary Code.

It is the aim of this policy to establish safeguards against drug and alcohol abuse in order to ensure a safe and healthy working environment. Substance abuse imposes a burden on those caught up in the abuse, but also on their co-workers. It may lead to poor job performance and workplace accident.

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.

Consumption of drugs and alcohol (including prescription and over the counter drugs) or intoxication during working hours implicates the health and safety of the individual and others, since these substances impair coordination, judgement, and decision making. Irresponsible behaviour resulting from the misuse of drugs and/or alcohol may damage our reputation and/or business, and as such, is a policy matter.

### **SCOPE OF POLICY**

This policy applies to any irregularity, or suspected irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with

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Reverside. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to Reverside.

## **POLICY ELEMENTS**

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

While working, employees must not:

- Possess, use or be under the influence of alcohol, inhalants or drugs.
- Sell, buy, transfer or distribute drugs or drug paraphernalia.
- Use prescription drugs (e.g. medical marijuana) while working or being on company premises.

It is Reverside's intention to restrict all and any drug and alcohol abuse during working hours and on Reverside premises or the premises of one of Reverside's clients. Alcohol abuse is defined as any drinking, either intermittent or continual, which interferes with health and/or social functioning and/or work capability or conduct. Drug abuse is defined as the use of illegal drugs, the deliberate misuse of prescribed or over the counter drugs, and the use of solvents, either intermittent or continuous, which interfere with health and/or social functioning and/or work capability or conduct.

In addition Reverside strictly prohibits employees, customers, or service users to dispense, manufacture, possess, use or sell drugs or alcohol on their premises. Employees found in possession of illegal drugs or using illegal drugs while at work will reported to the police.

To prevent accidents and productivity losses, Reverside may need to implement drug and alcohol tests for employees when:

1. The circumstances surrounding a workplace accident are unclear and we want to ensure there was no substance abuse involved.
2. There is reasonable suspicion that an employee is impaired due to a substance.  
Reverside reserves the right to send an employee for a substance test and then

home for the day if they are under the influence of drugs or alcohol. Employees may also be subject to disciplinary action.

## ***Disciplinary Consequences***

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

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

## **EDUCATION**

We are committed to promoting health and welfare at work. We will provide employees with information on safe and sensible drinking and the risks associated with drug use. We will disseminate this information via written materials and email communication. We are committed to providing suitable and sufficient training to help managers enforce this substance misuse policy and support any employees with a problem. Additional support can also be sought from the Human Resources Department.

Employees who suspect or know they have a drug or alcohol problem are encouraged to seek support at an early stage. In such instances, we recognise that it is up to the discretion of individuals regarding informing their line managers.

Managers will offer support to employees who are suspected of having an alcohol or drug problem. If the problem has become apparent because of a decline in work performance, management will place the employee on a performance improvement plan where the employee will be required to demonstrate improvement and satisfactory completion of the support programme. If performance does not improve, disciplinary action will be taken. We will give employees the opportunity to attend treatment in line with the sick leave policy.

## **IRREGULARITIES**

The Substance Abuse policy should be taken extremely seriously by all employees. Any employee who fails to comply with the Substance Abuse Policy, will be subject to disciplinary action and possible criminal charges.

Irregularities concerning an employee's conduct with regard to the Substance Abuse policy should be resolved by departmental management and the Director: Human Resources before concerning the Chief Executive Officer.

If there is any question as to whether an action constitutes an irregularity, contact the Director: Human Resources for guidance. The Director: Human Resources must coordinate all investigations with all affected areas, both internal and external.

## **INVESTIGATION RESPONSIBILITIES**

The Director: Human Resources has the primary responsibility for the investigation of all suspected misconduct with regard to the Substance Abuse policy. If the investigation substantiates that misconduct has occurred, the Director: Human Resources together with the Chief Executive Officer will institute the appropriate disciplinary action against the employee.

## **CONFIDENTIALITY**

The responsible parties must treat all information received confidentially. Any employee who suspects irregular conduct with regard to the Substance Abuse policy will notify the Director: Human Resources immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected misconduct (see REPORTING PROCEDURE section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect Reverside from potential civil liability.

## **AUTHORIZATION FOR INVESTIGATING SUSPECTED MISCONDUCT RELATING TO THE SUBSTANCE ABUSE POLICY**

The Director: Human Resources and his/her designated responsible parties will have:

- Free and unrestricted access to all Reverside records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation. Such activity will be thoroughly documented and recorded.

## **REPORTING PROCEDURES**

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects irregular conduct with regard to the Substance Abuse policy will contact the Director: Human Resources immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Director: Human Resources. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," or any other specific reference.

The reporting individual should take cognisance of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution;
- Do not discuss the case, facts, suspicions, or allegations with anyone who is not directly involved with the investigation or the outcome of the investigation and who have no legitimate need to know. This includes any family member and/or friend.

## **OUTCOME**

If an investigation results in a finding that irregular conduct with regard to the Substance Abuse policy has occurred, then the appropriate disciplinary action for Misconduct must occur. The Director: Human Resources is responsible for this procedure and, if necessary, outside counsel may be sought in order to take the necessary disciplinary action.

## **ADMINISTRATION**

The Director: Human Resources is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

## **APPROVAL**

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(Chief Executive Officer)

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Date