

Climbing Escalade Canada ("the Corporation") Substance Abuse Policy

1. Commitment

- 1.1 The Corporation is committed to protecting the health and safety of all individuals affected by its affiliates, as well as the communities in which it operates. The Corporation recognizes that the use of illegal drugs and the inappropriate use of alcohol, cannabis and medications can adversely affect job performance, the safety of employees and the general public.
- 1.2 This policy and its related practices apply to all employees, consultants and contractors when they are engaged in company business, both on and off the Corporation's premises, when operating a company vehicle or vehicle on behalf of the Corporation (i.e., rental), and when participating in any event associated with the Corporation. Contractors are expected to develop and enforce alcohol, cannabis and drug policies and practices that are consistent with this policy and its associated requirements.
- 1.3 To minimize the risk of unsafe performance due to alcohol, cannabis or drug use, employees, consultants and contractors are expected to report to work in condition to perform their duties, free from the influence of drugs or alcohol. The use of drugs or alcohol in the workplace will not be tolerated. For the purposes of this policy, 'drugs' mean any substance, including recreational cannabis, illegal drugs and medications, the use of which could alter impair or affect a person's thinking, behaviour or actions or otherwise interfere with an employee's ability/fitness to perform their duties and discharge their responsibilities in a safe and acceptable manner. 'Illegal drugs' mean any regulated substance, the possession, cultivation or trafficking of which is illegal under applicable legislation, and 'medications' mean any medication obtained: (i) in an over-the counter sale, (ii) by an employee pursuant to the prescription issued by a physician or (iii) by an authorization from Health Canada, and includes medical cannabis.

1.4 The following are expressly prohibited while on company business or premises:

- a) the use or possession of illegal drugs or illegal drug paraphernalia;
- b) the use or possession of alcohol;
- c) possession of prescribed medications not authorized for personal use or those that inhibit the ability to safely and efficiently perform job functions; and
- d) reporting for duty with the presence of alcohol or illicit drugs in the body.

1.5 Investigation procedures that may be utilized in support of this policy include:

- a) reasonable cause testing (including impaired driving);
- b) post-incident testing;
- c) reasonable grounds searches; and
- d) pre-access/pre-employment testing.
- 1.6 No employee, consultant or contractor shall refuse to submit to a test as required by this policy. No supervisor shall permit an employee who refuses to submit for required testing to perform or continue to perform safety sensitive functions. Any employee, consultant or contractor who refuses to a required test will be relieved of his or her duties and may face disciplinary action. Any employee, consultant or contractor

who tampers or attempts to tamper with a test sample, or obstructs the testing process could face disciplinary action.

- 1.7 Employees, consultants or contractors concerned about experiencing alcohol and drug-related problems are encouraged to seek assistance from the company's human resource department or their personal physician.
- 1.8 Disciplinary action up to and including termination will be taken for violations of this policy and its related practices.

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