

308 – IMPAIRMENT (Including Drugs and Alcohol)

1. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance and information to all employees of Sinopec Canada and its Canadian affiliates (Sinopec Canada Energy Ltd., Sinopec Daylight Energy Ltd. and SinoCanada Petroleum Corporation) (“Sinopec Canada” or the “Company”) relating to alcohol, drugs and impairment in the workplace.

This policy applies to all Sinopec Canada employees and references in this policy to “Employee” means employees of Sinopec Canada only.

Reference in this policy to “Sinopec Canada premises” includes premises, which Sinopec Canada owns, services, operates or otherwise controls, and includes third party worksites used for the purpose of performing an Employee’s assigned job duties.

1.1 Confidentiality Level

Published for all Sinopec Canada staff. Not for external distribution

2. POLICY STATEMENT

2.1 General

Sinopec Canada is committed to maintaining a safe workplace, which is free from drugs and alcohol. This is a responsibility of each Sinopec Canada Employee.

Sinopec Canada has a legal obligation to ensure the health and safety of all its Employees, and to ensure that Employees’ judgment and abilities are not impaired by drugs, alcohol or any other causes. Sinopec Canada recognizes that an Employee’s impairment can lead to mistakes and endanger the Employee’s own safety and the safety of others.

2.2 Safety Sensitive Positions

This policy, while applicable to all Employees, is particularly important in relation to Employees who are employed in safety-sensitive positions. A “safety-sensitive position” is a position which is occupied by an Employee (whether on a temporary or permanent basis) and which has the potential, if carried out improperly, to result in a serious incident affecting the health and safety of Employees, contractors, customers, the public and/or the environment. Employees who are required to temporarily relieve an Employee in a safety-sensitive position, or Employees who directly supervise an Employee in a safety-sensitive position and who may perform the same job duties or exercise the same responsibilities, are deemed to hold safety-sensitive positions.

2.3 Acknowledgment

Employees are required to sign an Employee Acknowledgment, in the form attached as Appendix I, confirming that they have read and understand this policy at the commencement of their employment or upon being assigned a safety-sensitive position.

3. ROLES AND RESPONSIBILITIES

The roles and responsibilities of Employees, Managers and the Company under this policy are outlined in Appendix II.

4. PROHIBITIONS

Employees:

- a. Must not attend work in an impaired condition (either through alcohol, drugs or otherwise);
- b. Must not consume any alcohol or cannabis on Sinopec Canada premises at any time or at any time while working for Sinopec Canada (including during lunch breaks or other rest periods during the work shift), except as permitted in relation to social functions, as set out in Section 10;
- c. Must not consume any prescription (including medical cannabis) or illegal drugs on Sinopec Canada premises at any time or at any time while working for Sinopec Canada (including during lunch breaks or other rest periods during the work shift), except as specified in Section 5;
- d. Must not be in possession of, distribute, use or sell any illegal drugs while on Sinopec Canada premises at any time or at any time while working for Sinopec Canada (including during lunch breaks or other rest periods during the work shift). This prohibition extends to Employees' vehicles, lockers, bags or other belongings; and
- e. Must not act contrary to this policy, any other Company policies or applicable laws and regulations in any way whatsoever.

5. EXCEPTIONS

5.1 Use of Non-impairing Prescription Drugs

Employees may consume prescription drugs which are legally prescribed to them on Sinopec Canada premises at any time or at any time while working for Sinopec Canada (including during lunch breaks or other rest periods during the work shift) or at a time when the effects of the drug may last until an Employee's shift only if the prescribed drug is not expected to cause the Employee to be impaired in any way while working for Sinopec Canada. This Section 5.1 does not apply to the use of legally prescribed medical cannabis, which is subject to the requirements set out in Section 5.2.

5.2 Use of Impairing Prescription Drugs

Employees who know or suspect that they may be impaired by taking a legally prescribed drug (including all legally prescribed medical cannabis) may only consume the drug on Sinopec Canada premises or prior to a work shift in the following circumstances:

- a. If the Employee is required to take such drugs as a result of a medical condition; and
- b. If the Employee advises his or her immediate Manager that he or she is taking a prescription drug that may affect the Employee's ability to carry out his or her assigned job duties; and
- c. The Employee has been cleared to continue performing their assigned job duties, or any duty modification or other accommodation deemed necessary and appropriate pursuant to Section 5.4 has been implemented.

The consumption or use of prescription drugs (including medical cannabis) which may cause impairment other than in accordance with this Section 5.2 shall be considered recreational and subject to the restrictions set out in this policy.

5.3 Medical Confirmation

Employees may be required to provide satisfactory medical confirmation that the Employee is required to take a prescribed drug and that the prescribed drug is not expected to affect the Employee's ability to carry out his or her duties.

5.4 Duty Modifications

If an Employee is taking a prescribed drug which may affect his or her ability to carry out his or her assigned job duties, Sinopec Canada may prevent the Employee from carrying out such duties. Sinopec Canada will explore alternative duties for the Employee to carry out in such circumstances. If no alternative duties are available, then Sinopec Canada may take any other measures which are appropriate in the circumstances, including but not limited to requiring the Employee to take unpaid leave.

6. DRUG, ALCOHOL AND IMPAIRMENT TESTING

6.1 Pre-Employment Testing

Job applicants or Employees who are moving to a new role (particularly if the role is safety-sensitive) may be required to undergo a drug, alcohol or impairment test before the job offer is finalized.

6.2 Return to Work Testing

Employees who have violated this policy and entered into an agreement with the Company pursuant to Section 9 may be required to successfully complete a drug, alcohol or impairment test prior to returning work.

6.3 Post-Incident Testing

Employees who are involved in an incident or near-miss which causes, or could have caused, damage to property or injury to others, are likely to be subject to a drug, alcohol or impairment test immediately following the incident.

6.4 Reasonable Suspicion Testing

Managers who have a reasonable suspicion that an Employee:

- a. Is impaired while on duty (including during lunch breaks or other rest periods during the work shift) for any reason; or
- b. Has consumed any amount of alcohol, cannabis, illegal drugs or prescription drugs (other than in accordance with Section 5.2) on Sinopec Canada premises or while on duty (including during lunch breaks or other rest periods during the work shift),

have the right to require that an Employee take a drug, alcohol or impairment test. Factors which may establish reasonable suspicion include, but are not limited to, the following:

- a. Sudden and unexplained changes in work performance;
- b. Erratic behaviour;
- c. Repeated and/or unexplained failure to follow instructions or operating procedures;
- d. Excessive unexplained absenteeism;
- e. Violation of Sinopec Canada policies (specifically including the Company's safety policies and procedures);
- f. Causing an accident or near-accident;
- g. Discovery of drugs or alcohol in an Employee's possession or near the Employee's workplace;
- h. Odour of alcohol or controlled substances;
- i. Personality changes or disorientation;
- j. Observable physical symptoms of drug or alcohol use; or
- k. A report that an Employee is engaging in conduct prohibited by this policy.

7. TESTING CONSENT

Once the decision to test has been made, the subject Employee will be asked to sign a Consent to Drug, Alcohol or Impairment Test form as attached in Appendix III.

If an Employee refuses to consent to the requested test, the Employee may become subject to disciplinary action in accordance with the Company's Corrective Action and Discipline policy on the basis of any reasonable suspicions and the negative inference resulting from the Employee's refusal to consent to the requested test, up to and including immediate termination of employment for cause.

8. DISCIPLINARY ACTION

8.1 Policy Violations

A failure to comply with the terms of this policy, as well as any deceit, dishonesty or deliberate or negligent misleading of the Company by an Employee with respect to this policy, will constitute a disciplinary offence and could lead to an Employee becoming subject to disciplinary action in accordance with the Company's Corrective Action and Discipline policy, up to and including immediate termination of employment for cause.

References in this policy to "immediate termination of employment for cause" generally mean termination without notice or payment in lieu of notice or any other severance payment whatsoever.

8.2 Positive Test Result

If an Employee's drug, alcohol or impairment test shows that the Employee was impaired while on Sinopec Canada premises at any time or at any time while working for Sinopec Canada (including during lunch breaks or other rest periods during the work shift), the Employee will be subject to disciplinary action in accordance with the Company's Corrective Action and Discipline policy. Sinopec Canada may impose a full range of disciplinary sanctions following a positive test, up to and including immediate termination of employment for cause. Sinopec Canada will take into account any drug or alcohol dependency or medical prescription properly disclosed by an Employee in accordance with this policy when considering what disciplinary action (if any) may be appropriate in the circumstances.

8.3 Refusal to take Test

If an Employee refuses to take a drug, alcohol or impairment test, without a reasonable explanation, may become subject to disciplinary action in accordance with the Company's Corrective Action and Discipline policy on the basis of any reasonable suspicions and the negative inference that attaches to the Employee's refusal to take the drug, alcohol or impairment test. Sinopec Canada may impose a full range of disciplinary sanctions following a positive test, up to and including immediate termination of employment for cause. Any refusal to take a drug, alcohol or impairment test, without a reasonable explanation, may lead to an immediate suspension of the Employee, usually without pay,

pending investigation.

8.4 Return Home

If a Manager (i) has requested that an Employee take a drug, alcohol or impairment test, or an Employee has taken such a test, and the results of are not immediately available, or (ii) an Employee has been suspended while at work pursuant to this policy, the Manager will require the Employee to return home until the Employee's Manager states that the Employee is permitted to return to work. The Employee may or may not be paid for such period of time, depending on the circumstances.

In such circumstances, Employees must not drive themselves home and Sinopec Canada will pay for the cost of the Employee's transportation home.

8.5 Police

In appropriate circumstances, Sinopec Canada may involve the police in any drug or alcohol related investigations.

9. RETURN TO DUTY POST VIOLATION

In situations where employment is continued following a violation of this policy, an Employee may be required to enter into any agreement with the Company which governs their continued employment and which may require any or all of the following actions, or any other conditions deemed appropriate in the circumstances:

- a. temporary removal from their position or assigned job duties;
- b. successful completion of a return to work impairment test;
- c. ongoing unannounced follow-up impairment testing for the duration of the agreement;
- d. adherence to any ongoing rehabilitation conditions or requirements, or recommended treatment and aftercare program; and
- e. no further violations of this policy.

Failure to meet the requirements of the agreement will cause the Employee to become subject to disciplinary action in accordance with the Company's Corrective Action and Discipline policy, up to and including immediate termination of employment for cause.

10. SOCIAL FUNCTIONS:

- a. Sinopec Canada recognizes that there may be social functions where the consumption of alcohol is permitted.
- b. In the event that the consumption of alcohol is permitted during a Sinopec

Canada sponsored social function or on Sinopec Canada premises, Employees are required to comply with all applicable laws and regulations if they choose to consume alcohol and must not return to work if they are impaired or suspect they may be impaired. For clarity, no Employee or guest under the established legal age for the use of alcohol (18 in Alberta) is permitted to consume alcohol during Sinopec Canada functions or on Sinopec Canada premises at any time. There are no exceptions to this rule.

- c. Alternative transportation home from Sinopec Canada sponsored social functions will be made available when possible.

11. ALCOHOL/DRUG DEPENDENCIES:

11.1 Drug and/or Alcohol Dependencies

Sinopec Canada recognizes that some Employees may have drug and/or alcohol dependencies. Drug and/or alcohol dependency is considered by Sinopec Canada to be a medical condition which Sinopec Canada will seek to assist the Employee in treating and overcoming.

11.2 Disclosure

Employees who are in safety-sensitive positions or whose job duties may be impacted by drug and/or alcohol dependencies and who are, or have been, dependent on drugs and/or alcohol must disclose this information to their immediate Manager or a member of People and Culture. Such information will be kept confidential and will only be disclosed to those in Sinopec Canada who required to know such information, for accommodation and other business purposes.

11.3 Failure to Disclose

A failure to disclose a drug and/or alcohol dependency by an Employee in a safety-sensitive position or in a position where his or her assigned job duties may be impacted by drug and/or alcohol dependencies is a serious matter as it could lead to the health and safety of the Employee and that of others being jeopardized. Any failure to disclose by an Employee is likely to lead to disciplinary action being taken against that Employee in accordance with the Company's Corrective Action and Discipline policy, up to and including immediate termination of employment for cause.

12. CONFIDENTIALITY AND PRIVACY

The results of an Employee's drug, alcohol or impairment test, and any information provided to the Company in accordance with Sections 5 or 11, is the Employee's personal information. Such information is being collected and used by Sinopec Canada for health and safety objectives. The information will be stored on the Employee's personal file which only People and Culture will have access to, as well as any other Sinopec Canada Employees with a business need to review such information. By agreeing to undergo such a test and providing such information to the Company, the Employee is also



agreeing to Sinopec Canada collecting, using and disclosing such personal information in line with these stated objectives.

Document History:

Version	Description	Owner	Date
1.0	Initial Document	Cam Proctor	Pre-acquisition
2.0	Revised – Drugs and Alcohol Policy	Cam Proctor	November 2013
3.0	Revised – Drugs and Alcohol Policy.	Eric Perez	March 2018
4.0	Renamed and revised to incorporate legalization of cannabis.	Kevin Long	September 2018
5.0	Revised – Impairment (including drugs and alcohol) Policy	Leah McLaughlin	November 2020



Appendix I

FORM OF EMPLOYEE ACKNOWLEDGEMENT

**EMPLOYEE ACKNOWLEDGMENT
IMPAIRMENT (INCLUDING DRUGS AND ALCOHOL) POLICY**

I, _____, have read and understand Sinopec Canada’s Impairment (Including Drugs and Alcohol) policy.

I understand that the use, possession, sale or distribution of alcohol, cannabis or illegal drugs in the work place is strictly prohibited. I also understand that the presence of such substances in my system during work hours places unacceptable risks and burdens on the safe and efficient operation of Sinopec Canada’s business, and is prohibited.

I further understand that pursuant to Sinopec Canada’s Impairment (Including Drugs and Alcohol) policy, I am subject to testing for alcohol, drugs and illegal drugs in my system.

I fully understand that cooperation with, and adherence to, Sinopec Canada’s policies and procedures regarding the testing of Employees for alcohol, cannabis and illegal drugs are conditions of my continued employment, and that if I violate or refuse to cooperate in any of these policies or procedures, I may become subject to discipline in accordance with the Company’s Corrective Action and Discipline policy, up to and including termination of employment for cause (i.e. without notice or payment in lieu of notice or any other severance payment whatsoever).

I understand that a positive reading for alcohol, cannabis or illegal drugs may result in me becoming disciplinary action in accordance with the Company’s Corrective Action and Discipline policy, up to and including immediate termination of employment for cause (i.e. without notice or payment in lieu of notice or any other severance payment whatsoever).

I authorize Sinopec Canada to receive and use the results of any testing for alcohol, cannabis or illegal drugs performed under this policy.

Employee Signature

Print Employee Name

I acknowledge being given a copy of this document.

Employee Signature

Date

Appendix II

ROLES AND RESPONSIBILITIES

1. Employees

In addition to performing their assigned job duties in a safe and responsible manner, all Employees will:

- understand and comply with the requirements and obligations set out in this policy;
- ensure they are not impaired prior to and during the performance of all scheduled and unscheduled duties;
- notify their Manager if they are impaired or suspect they may be in violation of this policy;
- notify their Manager if they suspect another Employee, contractor or visitor is impaired; and
- cooperate with any modification to their assigned job duties related to safety concerns.

2. Managers

For the purpose of this policy, “Manager” means an Employee whose assigned job duties include, and is responsible for, leading and/or supervising other Employees.

In addition to performing their assigned job duties in a safe and responsible manner, all Managers will:

- understand and comply with the requirements and obligations set out in this policy;
- be expected to recognize the symptoms or indications of impairment and enforce the requirements of this policy with respect to Employees who are suspected of being impaired;
- immediately assess any suspected or known violation of this policy; and
- uphold any duty modification, accommodation or disciplinary action taken by the Company pursuant to this policy.

3. Company

The Company is responsible for:

- providing ongoing leadership and supervision to ensure the implementation, adherence to, and the effectiveness of this policy;



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- determining and providing appropriate levels of training for Employees;
- take appropriate steps to ensure suspected or known violations of this policy are properly investigated, and appropriate remedies (including but not limited to, duty modifications, accommodations or disciplinary action) are implemented following the completion of any such investigation; and
- assist Employees who may have a known dependency as set out in Section 11.



Appendix III

FORM OF CONSENT TO DRUG, ALCOHOL OR IMPAIRMENT TEST

CONSENT TO DRUG, ALCOHOL OR IMPAIRMENT TEST

IMPAIRMENT (INCLUDING DRUGS AND ALCHOL) POLICY

I, _____, hereby agree as follows:

1. I consent to Sinopec Canada carrying out a drug, alcohol or impairment test on me as at the date I sign this Consent Form.

2. *Cross out whichever does NOT apply:*

(a) I do not have a drug and/or alcohol dependency; OR

(b) I do have a drug and/or alcohol dependency and the reasonable accommodation measures I would ideally like are as follows:

3. I understand that a positive reading indicating impairment may result in my becoming subject to disciplinary action in accordance with Sinopec Canada’s Corrective Action and Discipline policy, up to and including the termination of my employment for cause (i.e. without notice or payment in lieu of notice or any other severance payment whatsoever).

4. I authorize Sinopec Canada to receive and use the results of any drug, alcohol or impairment test performed pursuant to this Consent Form and Sinopec Canada’s Impairment (including Drugs and Alcohol) policy.

5. I understand that the results of a drug, alcohol or impairment test are my personal information and that such information is being collected and used by Sinopec Canada for health and safety objectives. I understand that the information will be stored on my personnel file which only Sinopec Canada’s People and Culture group will have access to, as well as any other Sinopec Canada Employees with a business need and proper authorization to review such information. By signing below I hereby agree to Sinopec Canada collecting, using and disclosing such personal information in line with these stated objectives.

6. I understand that I may choose not to undergo a drug, alcohol or impairment test.



However, I also understand that if I do not agree to undergo such a test, I may become subject to disciplinary action in accordance with Sinopec Canada’s Corrective Action and Discipline policy, up to and including having my employment being terminated, potentially for cause (i.e. without notice or payment in lieu of notice or any other severance payment whatsoever).

Cross out whichever does NOT apply:

EITHER: I do consent to a drug, alcohol or impairment test on the terms set out above. I have had a reasonable opportunity to consider this Consent Form and I acknowledge that I have not signed it under any type of duress. I have also had an opportunity to obtain independent legal advice prior to the signing this Consent Form.

OR: I do not consent to a drug, alcohol or impairment test on the terms set out above. I understand that by failing to consent to undergo such a test, I may become subject to disciplinary action in accordance with Sinopec Canada’s Corrective Action and Discipline policy, up to and including having my employment being terminated, potentially for cause (i.e. without notice or payment in lieu of notice or any other severance payment whatsoever).

Name (Please Print)

Date

Signature