



ALCOHOL AND DRUG POLICY

CANADA



TABLE OF CONTENTS

1. GENERAL PROVISIONS.....3

 1.1 Purpose..... 3

 1.2 Definitions 3

2. RULES REGARDING ALCOHOL & DRUGS IN THE WORKPLACE.....5

 2.1 Responsibilities 5

 2.2 Prohibitions 7

 2.3 Medications 7

 2.4 Company-authorized Social Events 7

 2.5 Specific Site Rules 8

 2.6 Vehicles, Licenses and Offences..... 8

3. INVESTIGATION8

 3.1 Fitness for Duty 8

 3.2 Suspected Presence of Alcohol, Drugs or Drug Paraphernalia 8

4. ASSISTANCE AND ACCOMMODATION9

 4.1 Assistance 9

 4.2 Accommodation 9

5. TESTING AND SEARCHES 10

 5.1. Testing 10

 5.2 Searches of Company Worksites 11

6. TESTING PROCEDURES 11

 6.1 Testing Procedures..... 11

 6.2 Internal Communication of Results..... 12

 6.3 Confidentiality 12

7. COMPLIANCE 12

 7.1 Failure to Comply with this Policy 12

 7.2 Failure to Test 12

 7.3 Positive Test Results 13

 7.4 Return to work 13

8. CONTRACTOR PERFORMANCE 14

 8.1 Compliance Requirements 14

 8.2 Incident Management..... 14

SCHEDULE A - EMPLOYEE ACKNOWLEDGMENT.....15

SCHEDULE B - FIT FOR DUTY CHECKLIST..... 16

SCHEDULE C CONCENTRATION LIMITS.....17

1. GENERAL PROVISIONS

1.1 Purpose

The management of Total Energy Services Inc. ("**Total Energy**") and its subsidiaries and affiliates worldwide (each a "**Division**", where each Division and Total Energy are collectively and individually, as the case may be, the "**Company**"), are committed to the health, safety and wellness of our Employees, Contractors and the public, and to the protection of the environment. The use of illegal Drugs and/or the inappropriate use of Alcohol or Medications can have serious adverse impacts in the workplace and to the health, safety and wellness of our Employees, Contractors and the public, and to our environment. Employees have the responsibility to report to work Fit for Duty (and refuse a request to report to work if not Fit For Duty) and remain Fit for Duty throughout their scheduled work times and when on On-call or Standby. Our *Alcohol and Drug Policy* ("**Policy**") supports Total Energy's corporate *Health, Safety and Environment Policy* and is part of Total Energy's and each Division's overall approach to risk mitigation and safety.

This Policy applies individually to each Canadian Division and to all Employees of Canadian Divisions while they are engaged in Company business whether working on or off Company Worksites. In addition to the obligations set out in this Policy, special rules may be established by the Company in particular situations where circumstances warrant. All Company Contractors are required to meet the requirements set forth in Section 8.

1.2 Definitions

In this Policy:

"Alcohol" means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol.

"Company Worksite" means any place where the Company conducts business, including, without limitation, property, buildings, equipment, private and public road systems, camps and camp access roads, and Company vehicles, whether owned, leased or rented.

"Company Vehicle" means a Company-owned, rented, leased or otherwise controlled motor vehicle, including, without limitation, a car, truck, SUV or any other motorized equipment capable of transporting people or goods.

"Concentration Limits" are the limits are set out in Schedule C of this Policy, including the Screening Level and the Confirmation Level.

"Contractor" means consultants and third party contractors, subcontractors and service providers, and their employees and representatives engaged by the Company to perform services at a Company Worksite.

"Designated Employee Representative" or **"DER"** means an employee, usually in HR or HSE, designated by Company management to receive and act upon testing results.

"Drug" means any drug, chemical or agent that may be used to alter the way the body or mind functions and includes without limit illicit drugs, Medications, Medical Cannabis and Legal Recreational Cannabis.

"Drug Paraphernalia" means any equipment, product or material intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing or introducing an illicit Drug into the human body.

Paraphernalia also includes clothing that displays drug related images, images of equipment used to consume drugs or promotes the use of drugs. This also refers to any product or device that may be used to attempt to mask, tamper with or adulterate an Alcohol or Drug testing sample.

"Employee(s)" means all regular full-time, part-time, contract, temporary, casual, co-op, summer and seasonal employees on the Company employee payroll.

"EAP" means Employee Assistance Program

"Executive" means an officer of Total Energy or any of its Divisions.

"Failure to Test" includes the failure to report directly for a test or within a designated time frame, refusal to submit to a test, or refusal to agree to disclosure of a test result to HR. A failure to test will also include inability to provide sufficient quantities of breath or urine fluid to be tested without a valid medical explanation acceptable to the Company, or any tampering, adulterating or interfering with testing or a test sample.

"Fitness for Duty" or **"Fit for Duty"** in the context of this Policy means being able to safely and acceptably perform assigned duties and make judgments without any limitations due to the use or after-effects of Alcohol or Drugs.

"HR" means the Human Resources Department of the applicable Company.

"HSE" means the Health, Safety and Environmental Department of the applicable Company.

"Incident" means any actual or potential situation in which a person, property or the environment was harmed or could have been harmed.

"Legal Recreational Cannabis" means cannabis legally purchased and used in Canada in compliance with federal regulation effective October 17, 2018, as may be amended from time to time, as well as in compliance with any other applicable law, rule or regulation, including without limit any provincial or municipal law.

"Medication" means a Drug obtained (i) over-the-counter, or (ii) by the Employee through a physician's prescription, or (iii) through a Health Canada authorization.

"Medical Cannabis" means cannabis validly obtained through a Health Canada authorization.

"Medical Review Officer" or **"MRO"** means an impartial licensed physician trained to analyze laboratory results from Alcohol and Drug testing programs and provide medical explanations for specific blood tests.

"Negative Test Result" means a report from a certified lab showing that an individual who provided a specimen for Alcohol or Drug testing did not have an Alcohol or Drug concentration equal to or in excess of the Concentration Limits specified in Schedule C of this Policy.

"On-Call" means the designated period during which an Employee is expected to respond to after-hours call out.

"Presumptive Positive Test Result" means a preliminary test showing that an individual who provided a specimen for Alcohol or Drug testing had an Alcohol or Drug concentration equal to or in excess of the Concentration Limits, or an inconclusive Drug screen, to be followed up by testing at a certified lab and reviewed by a medical review officer.

"Positive Test Result" (non-negative result) means a report from a certified lab showing that an individual who provided a specimen for Alcohol or Drug testing had an Alcohol or Drug concentration equal to or in excess of the Concentration Limits, or a test result that identifies the presence of Drugs not listed in Schedule C but is nevertheless determined to have impaired an individual's Fitness for Duty.

"Reasonable Cause" means whenever an authorized Company representative has reasonable grounds to believe that the actions, appearance or conduct of an Employee or Contractor while on duty are indicative of the use of Alcohol or Drugs (other than the approved use and possession of Medication in accordance with Section 2.3. Reasonable grounds may include, without limitation, the physical and behavioral symptoms identified in Schedule B.

"Safety-Sensitive Position" means a position in which an individual has a key and direct role in an operation where the effects of Alcohol or Drugs, could: (i) have a serious adverse effect on the health or safety of the individual or persons on or off Company Worksites; or (ii) could have a serious adverse impact on property or the environment; or (iii) could result in a failure to adequately respond to an emergency situation.

"SAMHSA" means the Substance Abuse Mental Health Services Administration.

"Standby" means scheduled or continuous standby.

"Substance Abuse Assessment" means an assessment conducted by a SAP to determine whether an Employee has a substance abuse disorder.

"Substance Use Disorder" occurs when the recurrent use of Alcohol and/or Drugs causes impairment such as health problems, disability or failure to meet personal or workplace responsibilities, which impairment may vary by degree from mild through severe.

"Substance Abuse Professional" or "SAP" means an individual with knowledge of and clinical experience in the diagnosis and treatment of Alcohol and Drug related issues.

2. RULES REGARDING ALCOHOL & DRUGS IN THE WORKPLACE

2.1 Responsibilities

- a) Employees will:
- i. report Fit for Duty for all scheduled, On-Call and Standby work and remain Fit for Duty while on On-call or Standby and while on Company business or on Company Worksites,
 - ii. not report for work, or ever work:
 - A. with an Alcohol level equal to or in excess of the Concentration Limits;
 - B. with a Drug level equal to or in excess of the Concentration Limits, noting that the Company does not permit the use of illegal Drugs; or
 - C. while the Employee's ability to safely perform his or her duties is adversely affected because of the use of Medication.
 - iii. not operate a Company Vehicle or any vehicle on company business when they have an Alcohol or Drug

concentration greater than those in listed in the Concentration Limits in Schedule C (other than the approved use of Medication in accordance with Section 2.3);

- iv. report for testing and participate in testing as required and promote the integrity of the testing process without tampering, adulterating or interfering with testing (e.g., masking agents, diluting);
 - v. decline work requests while under the influence of Alcohol or Drugs (other than the approved use of Medication in accordance with Section 2.3), if they are contacted by Company to perform unscheduled services. In the event Employee so declines, there will not be any adverse consequences to the Employee;
 - vi. advise a supervisor as soon as possible if another person may not be Fit for Duty, may be under the influence of Alcohol or Drugs (other than the approved use of Medication in accordance with Section 2.3), if Alcohol or Drugs (other than Medication approved in accordance with Section 2.3) are present or being used, sold or distributed at a Company Worksite or may otherwise be in violation of this Policy;
 - vii. refrain from the use of Alcohol or Drugs (other than the approved use of Medication in accordance with Section 2.3) after being involved in or observing an Incident until the earlier of (i) the Employee has been tested, or (ii) the Employee has been advised by the Company that they will not be tested, or (iii) 32 hours have elapsed since the Incident;
 - viii. report the use of any substance whether alcohol, illicit drugs, prescribed medication, over the counter medication or legal and medical marijuana that may impair the worker ability to work safely and effectively to their supervisor prior to starting work.
 - ix. when requested, participate with full cooperation and honesty in any investigation under this Policy;
 - x. read, understand and abide by this Policy, as well as their responsibilities under it and from time to time acknowledge their agreement to comply upon request by Company;
 - xi. voluntarily disclose to and seek assistance for their own current or emerging Substance Use Disorder from Company and prior to any Incident, and follow recommended monitoring programs after attending treatment; and
 - xii. cooperate with any work modification related to safety concerns.
- b) The Company is responsible for:
- i. ongoing leadership and supervision to ensure safe operations and effectiveness of the safety program;
 - ii. determining substances and concentration limits for testing as set out in Schedule C, provided that each Division, with the approval of the Total Energy Vice President, Operations, may test for additional substances or at more stringent concentrations;
 - iii. determining and providing appropriate levels of training for Employees, including safety concerns related with substance use and impairment, Fit For Duty requirements and responsibilities under this Policy;
 - iv. determining and providing appropriate levels of training for supervisors to recognize Reasonable Cause using Schedule B or other effective method and to follow the Reasonable Cause and Post-Incident testing procedures outlined in this Policy;

- v. guiding Employees who disclose and seek assistance for a Substance Use Disorder to appropriate resources while maintaining confidentiality in accordance with this Policy;
- vi. accommodating Employee disability disclosed to Company prior to an Incident to the point of undue hardship;
- vii. making arrangements for an assessment through HR if, in the course of any performance-related discussion, an Employee voluntarily discloses they have a Substance Use Disorder;
- viii. taking appropriate steps to investigate any possible violation of the requirements set out in this Policy;
- ix. implementing the requirements of this Policy.

2.2 Prohibitions

The following are strictly prohibited while on a Company Worksite, on duty, On-Call or Standby:

- a) the use, possession, cultivation, manufacture, storage, distribution, offering or sale of Alcohol (unless permitted in accordance with Section 2.4), Drugs, including Medical Cannabis and Legal Recreational Cannabis (other than the approved use and possession of Medication in accordance with Section 2.3), or Drug Paraphernalia;
- b) the possession or use of any product or device that could tamper with any sample for an Alcohol or Drug test;
- c) the possession, storage or use of prescription Medications prescribed for another individual or the possession, storage or use of prescription Medications without being able to produce a legally, medically obtained prescription; and
- d) the distribution, offering or sale of Medication.

2.3 Medications

Employees shall use Medications responsibly and seek appropriate guidance regarding Medications that may impact Fitness for Duty. For clarity, the possession or use of Medication is permitted where the Employee has met all of the following conditions, to the satisfaction of Company, and has produced appropriate accompanying documentation where requested:

- a) any Medication in the Employee's possession or used by the Employee is prescribed to the Employee and validly obtained through a pharmacy, or in the case of Medical Cannabis, the purchase has been authorized by their physician and is from a facility licensed by Health Canada;
- b) the Employee is using the Medication for its intended purpose, and in the manner directed by the Employee's physician and/or the manufacturer of the Medication;
- c) the use of the Medication does not adversely affect the Employee's Fitness for Duty, and the Employee will provide written confirmation of Fitness for Duty from their prescribing or authorizing physician;
- d) in Safety-Sensitive Positions, the Employee has notified his or her supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the Medication and has signed an agreement restricting use before and at work as necessary to ensure that the risk of impairment is eliminated, and acknowledging if a Positive Test Result or a violation of use restrictions occurred, the Employee would be in

breach of this Policy.

- e) any changes or modifications to the Employee's prescription or authorization to purchase is promptly reviewed with Company and the agreement will be revised where appropriate.

2.4 Company-authorized Social Events

In the case of a Company social event, appropriate regard will be taken for the safety and well-being of the individuals present and the community. Responsible Alcohol use may be permitted at Company- sponsored social functions. Total Energy's *Code of Business Conduct* remains in effect at all Company-sponsored events and any Alcohol or Legal Recreational Cannabis consumption is expected to be done responsibly and in moderation. If an Employee is no longer Fit for Duty following a Company social event, that Employee shall not report back to work. The use, possession, distribution and offering for sale of Drugs and Drug Paraphernalia at Company-sponsored social situations is strictly prohibited.

Consistent with the above, if Alcohol is made available to Company guests in the course of conducting Company business (for example, restaurant meetings), Employees are expected to use reasonable judgment and be responsible in hosting others, and remain in compliance with the Policy.

2.5 Specific Site Rules

This Policy sets out requirements which may be enhanced or modified by any Divisions in respect to any facility, site, work camp or business unit where justified. Any enhancements or modifications must be supported by justification and approved by Total Energy's Vice President, Operations. Where applicable, Employees and Contractors will be subject to such special rules, and shall also be required to comply with any rules or procedures established by the owner/operator at a Company Worksite.

2.6 Vehicles, Licenses and Offences

Maintaining a valid driver's license is a condition of employment in any position that requires the operation of a Company Vehicle or any vehicle while on company business. Employees who may be required to operate a Company Vehicle or any vehicle while on company business are required to notify their supervisor as well as HR immediately upon any suspension of or disqualification of their license to operate a motor vehicle, regardless of the reason or duration of the suspension or disqualification. Further, all Employees are required to notify Company in the event of any charge or conviction in relation to an Alcohol or Drug-related offence under the *Criminal Code of Canada* or any other statute or regulation that may have the potential to adversely affect the Employee's job performance or responsibilities.

3. INVESTIGATION

The Company will investigate any violations or suspected violations of this Policy including, but not limited to, the following situations:

3.1 Fitness for Duty

In all situations where there is Reasonable Cause to believe that an Employee may not be Fit for Duty at a Company Worksite the supervisor must take one or more of the following actions:

- a) referral for medical attention if there are immediate medical concerns (for example, a health center, local hospital or clinic);
- b) referral for an Alcohol and/or Drug test if there is Reasonable Cause (See Schedule B); and/or

The Employee may be temporarily removed from their duties or reassigned pending completion of any investigation. If testing is required, it shall be completed in accordance with Section 5.1 and the reasons for testing shall be documented as soon as practical after the action has taken place.

3.2 Suspected Presence of Alcohol, Drugs or Drug Paraphernalia

The Company reserves the right to investigate any situation where there are reasonable grounds to believe that Alcohol, Drugs or Drug Paraphernalia are present on any Company Worksite in violation of this Policy. Supervisors are responsible for identifying situations where an investigation is justified based on whether or not there is Reasonable Cause. Supervisors will be responsible for advising their manager of the situation who, after consultation with the Company's HSE and HR, will make the final decision as to whether and how to initiate an investigation.

4. ASSISTANCE AND ACCOMMODATION

4.1 Assistance

The Company recognizes the importance of prevention and early identification of potential Substance Use Disorders for its Employees. Employees who believe that they may have developed a Substance Use Disorder are required to disclose to and seek assistance from their supervisor or any member of HR, prior to any situation requiring testing under section 5.1 and to follow an appropriate treatment and rehabilitation plan. Failure to disclose and seek assistance for a substance use disorder will be considered a breach of this policy and will be just cause for termination. Employees who believe that a fellow Employee has or may have a Substance Use Disorder should encourage that individual to seek counseling or treatment, preferably at an early stage. An Employee who makes a request for assistance will be referred to a SAP for a Substance Abuse Assessment.

Employees who have an Alcohol or Drug dependency that affects or may affect the performance of their duties are required to undergo appropriate treatment prior to returning to active duty. No Employee will be disciplined or terminated solely for voluntarily disclosing or requesting assistance to overcome an Alcohol or Drug dependency, or because of their participation in a treatment and rehabilitation plan. Failing to meet with a SAP or attend a Substance Abuse Assessment where so directed is a breach of this Policy and will be just cause for termination.

Total Energy offers an EAP for all of its Employees and those of its Divisions and their immediate families, which includes without limit, counselling and treatment referral for Alcohol and Drug dependency. Any counselling or treatment costs not covered under the benefit plan will be at Employee's cost.

4.2 Accommodation

The Company will take reasonable steps to accommodate any Employee who voluntarily discloses a Substance Use Disorder, in accordance with applicable law and this Policy. Such efforts may include an unpaid leave of absence, Substance Abuse Assessments, employee and family assistance programs or other appropriate measures. Each case will be reviewed on a case-by-case basis. Appropriate measures including relocation and reassignment may be taken on a temporary basis, to ensure the safety of all persons and the protection of the

environment and property.

5. TESTING AND SEARCHES

5.1 Testing

In order to ensure compliance with this Policy and to minimize the risk to Company posed by impairment at any Company Workplace, Alcohol and Drug testing will be conducted for Employees in the following circumstances:

a) Pre-employment Testing

Alcohol and Drug testing shall be conducted when hiring persons for Safety-Sensitive Positions or transferring Employees to, or cycling Employees through, a Safety-Sensitive Position from a position that did not have this requirement. Any offer of employment for such a position is deemed to be conditional upon a Negative Test Result.

b) Testing for Existing Employees

Employees in Safety Sensitive Positions who have not been actively at work for a period of 12 months or more will be asked to complete fitness for work testing including alcohol and drug testing.

c) Post-incident and Near Miss Testing

A supervisor or a manager of an Employee who is involved in a serious work-related incident must request that Employee to submit to Alcohol and/or Drug testing.

A serious work-related incident would be one involving the Employee that resulted in:

- i. a fatality;
- ii. a personal injury requiring medical treatment to the Employee, any other worker, a member of the public or any other individual;
- iii. an incident with a potential for personal injury requiring medical treatment to the Employee, any other worker, a member of the public or any other individual;
- iv. an act of violence or harassment;
- v. an environmental incident or a potential environmental incident with significant consequences;
- vi. a significant or a potential significant loss or damage to property or equipment;
- vii. a significant or a potential significant loss of Company revenues or the payment of damages; or
- viii. a serious motor vehicle accident involving a Company Vehicle, or a serious motor vehicle involved in an accident on a Company worksite.

In addition to the incidents listed above, at their discretion and as part of a complete investigation, a supervisor or manager may require a post-incident test after any other serious work incident or an incident without loss which is nonetheless considered to have had potential for more serious consequences. Testing will also be

required as part of an investigation into a less serious incident if, as a result of the preliminary review, it is reasonably believed that Alcohol or Drug use may have been a factor.

d) Reasonable Cause Testing

A supervisor or a manager of an Employee must request that an Employee submit to Alcohol and/or Drug testing if the supervisor or manager and the next level of management, where possible, have Reasonable Cause to believe that the Employee is or may be unable to work in a safe manner due to impairment or have otherwise acted in breach of this Policy.

e) Return to Work Testing (Post Treatment)

Following a voluntary disclosure by an Employee of a Substance Use Disorder, Employees shall follow a return to work plan and will be required to enter into an agreement regarding their continued employment with the Company. The work plan or agreement (as applicable) may include, but is not limited to: temporary position change, follow-up Alcohol and/or Drug testing, requirements to continue on-going rehabilitation and such other requirements as determined in the Substance Abuse Assessment for that Employee or otherwise required by Company.

f) Legitimate Customer-requested Testing including pre-access

At times employees may be required to provide alcohol and drug testing results as per customer contract in order to gain access or to continue working for the customer.

If a follow up request is received from a customer to test an Employee or Contractor representative, the appropriate Company manager shall report the request to operational management for evaluation and approval. The manager shall communicate the details surrounding the request, in order to permit operational management to make a decision as to whether the testing is reasonable in the circumstances, in which case Employees shall submit to same upon the direction of Company.

g) Employee-requested Testing

Employees who receive a Positive Test Result may request a re-test of their original sample by another approved testing facility within 72 hours of being notified of their result, at the Employee's expense. Employee shall contact the appropriate management regarding the nearest locations for an approved testing facility.

5.2 Searches of Company Worksites

Searches may be conducted by Company to confirm compliance with this Policy. Searches of personal items must be based on Reasonable Cause in accordance with Schedule B. Searches may be conducted with or without sniffer dogs. Prior to work at a Company Worksite, Contractors will advise their employees, sub-contractors and agents that the Company may search its Company Worksites and any individual or property on these locations to confirm compliance with this Policy and will obtain the consent of its employees, subcontractors and agents to permit Company to perform such searches. Law enforcement may be called on to conduct searches of property and/or people as deemed necessary. Clients reserve the right to search employee property for alcohol, drugs and drug paraphernalia while the Company is operating on the client property.

6. TESTING PROCEDURES

6.1 Testing Procedures

Any person who requires an Employee to be tested for Alcohol or Drugs under the terms of this Policy must tell the Employee beforehand why the test is being requested.

With respect to Post-Incident and Near Miss Testing and Reasonable Cause Testing, samples must be collected within 8 hours after the incident for an Alcohol test and 32 hours after the incident for a Drug test.

Unless otherwise directed by Total Energy, all alcohol and drug testing will meet SAMSHA standards, including those regarding custody and security, and shall be conducted by Total Energy's SAMHSA-approved testing service provider or by approved Company personnel. When testing for either Alcohol or Drugs is to occur, the Company will direct the Employee to a sample collection site designated by SAMHSA approved testing service provider or a certified lab or hospital/clinic, depending on the circumstances. For Post-Incident and Near Miss Testing and Reasonable Cause Testing, the Employee will be provided with transportation and escorted to the collection site or hospital/clinic, and then transported to their local place of residence or the care of another adult person. At the Company's discretion, a qualified technician may be brought to the Company Worksite to conduct testing. All testing shall be conducted following the below procedures:

- a) Alcohol testing will be conducted by breath testing. Drug testing will consist of saliva testing or urinalysis unless otherwise determined by the Company.
- b) All tests will be reviewed by a Medical Review Officer to ensure that there are no other factors that could influence the test results.

The Company reserves the right to test for any substances in addition to those listed in Schedule C at its sole discretion without prior notice.

6.2 Internal Communication of Results

The procedure for internal communication of the results of any Alcohol or Drug testing under this Policy shall be as follows:

- a) **Positive Test Results** – Presumptive Test Results and Positive Test Results will be received only by the Designated Employer Representative(s) (DER) and shared by them only with those authorized Company Employees who need to know in order to act on the confidential results.
- b) **Negative Test Results** – Negative Test Results will be received only by the DER and shared by them only with those authorized Company Employees who need to know in order to act on the confidential results.

6.3 Confidentiality

All test samples and results shall be treated as confidential by Company, subject to such reasonable disclosure as is required in order to manage the individual employment or Customer/Contractor relationship. Test results will be securely stored and will only be disclosed to authorized Company Employees, medical and legal professionals and as required by law, unless explicit written consent is obtained from the Employee.

7. COMPLIANCE

7.1 Failure to Comply with this Policy

While the Company's preferred approach is to prevent Alcohol and Drug related impairment in Company Workplaces and to offer its Employees who have disclosed Substance Use Disorders reasonable accommodation and support through treatment and rehabilitation, Employees and Contractors should understand that any violation of this Policy will be considered a breach of the terms of their employment or contract with the Company. The Company will discipline an Employee who fails to comply with any of the requirements of this Policy. Discipline may include a variety of measures, up to and including termination for cause. Determination of the appropriate disciplinary measure will depend on the facts surrounding each case, including the nature of the violation, prior violations, response to corrective programs and the gravity of the violation.

If an employee is terminated for breach of this policy, they may apply for rehire after a period of at least six (6) months. Rehire will be contingent on the former employee passing the pre-employment testing which includes alcohol and drug testing.

7.2 Failure to Test

A Failure to Test shall be considered a breach of this Policy and will result in disciplinary measures up to and including termination for cause.

7.3 Positive Test Results

A Positive Test Result shall be considered proof of impairment on the job and a breach of this Policy. Any Employee who receives a Presumptive Positive Test Result will be immediately placed on a temporary leave of absence without pay, until further investigations can be conducted. A verified Positive Test Result shall be considered a breach of this Policy and will result in discipline measures up to and including termination for cause.

Where an Employee has disclosed a Substance Use Disorder or seeking rehabilitative help or involvement in a treatment and rehabilitative plan before the incident that resulted in the Positive Test Result will not prevent an Employee from being disciplined or terminated for cause.

A conditional offer made to an applicant for a Safety Sensitive Position who does not receive a Negative Test Result or who receives a Positive Test Result may be immediately revoked. After a thirty (30) day period has passed, the applicant may apply for future opportunities, and will again be asked to complete pre-employment testing which includes Alcohol and Drug testing.

7.4 Return to Work

In addition to any requirements under any return to work policy of Company, prior to any return to work after voluntary disclosure of a dependency and participation in treatment and rehabilitation plan, an Employee in a Safety-Sensitive Position shall provide medical information satisfactory to Company, acting reasonably, that they are Fit for Duty with no limitations or restrictions in order to resume their position, or that there are defined limitations that the employer must accommodate (to the point of undue hardship).

8. CONTRACTOR PERFORMANCE

8.1 Compliance Requirements

Contractors shall ensure that their employees, subcontractors and agents are Fit for Duty while working on Company Worksites. The Company requires Contractors and their sub-contractors who provide services to the Company to have in place and enforce an alcohol and drug policy which meets or exceeds this Policy. Any Contractor that does not have such policy in place shall be required to comply with this Policy as if its employees and representatives were Employees hereunder. Contractors shall maintain statistics of testing dates and results (without identifying the individuals tested), which may be reviewed by the Company at any time. Contractor shall promptly report to Company any such testing that resulted in Positive Test Results on Company Worksites (again, without identifying the individuals tested). The Company may also review Contractors' policies and performance to ensure compliance with this Policy.

The Company may, at the discretion of management, require a Contractor to certify that all of its representatives performing safety-sensitive functions at a Company Worksite or project have been tested for Alcohol or Drugs prior to their first entry to the Company Worksite. The Company reserves the right to refuse access to a Company Worksite by any representative of a Contractor where that representative, in the sole opinion of the Company, may in any way present a risk to the safety of any person or property at the Company Worksite. Where any Contractor representative is found to be in breach of this Policy, the Company may terminate their contract with the Contractor.

8.2 Incident Management

Where an Employee or the Company's representative at a Company Worksite who is responsible for supervising the work of a Contractor representative has Reasonable Grounds for believing the representative is not Fit for Duty, the Employee or The Company's representative shall instruct the Contractor's representative immediately to stand down and notify the Contractor's manager and the relevant Company manager of this action.

Where such an incident results in a positive Alcohol or Drug test facilitated by the Contractor, the Contractor shall respond to the situation in accordance with this Policy or the Contractor's drug and alcohol policy (as applicable). In addition, the Company Employee or representative supervising the Contractor's performance may require the Contractor to attend a meeting for the purpose of reporting on the action taken by the Contractor in response to the incident.

Any costs incurred in connection with a Policy violation by a representative of a Contractor shall be the responsibility of such Contractor.

This corporate Alcohol and Drug Policy approved on this 30th day of November, 2023.



Brad Macson
Vice President, Operations
Total Energy Services Inc.

SCHEDULE A

**ACKNOWLEDGMENT OF ALCOHOL AND DRUG POLICY, AGREEMENT TO SUBMIT TO REASONABLE
CAUSE SUBSTANCE TESTING AND AGREEMENT TO RELEASE TEST RESULTS**

I, _____, understand that _____ (the "Company") maintains an Alcohol and Drug Policy (as amended from time to time, the "Policy") requiring all employees to report to work free from impairment from alcohol and drugs. I acknowledge that I have received and read a copy of the Policy. If I did not understand the Policy, I have asked for and have received an explanation. I understand that I am required to review and adhere to any updates or amendments to the Policy and that any breach of the Policy will result in disciplinary measures, up to and including termination of my employment for cause.

I also understand that as a condition of my continued employment, where the circumstances requiring testing outlined in the Policy exist, the Company will require me to undergo testing for the presence of alcohol or drugs and I hereby consent and agree to submit to such testing.

I further consent to the collection, use and disclosure of my Personal Information (as defined below) by the Company pursuant to Policy, and consistent with applicable Provincial and Federal privacy laws. I understand that "Personal Information" when used in this acknowledgment refers to information about me as an identifiable individual. I further understand that my Personal Information will contain my personal health information collected by the Company for the purposes of enforcing the Policy, including the results of any substance testing results being released only to those authorized Company Employees who need to know in order to act on the confidential results.

I also understand and agree that if I wish to take prescribed or otherwise legally authorized medications, including without limit, medical cannabis, I am required to provide certain documentation to the Company, which may include my proper prescription/authorization, purchase from a licensed facility and doctor's authorization stating any limitations to my fitness for duty as a result of such medications.

I also understand and agree that I am responsible for voluntarily disclosing any substance use disorder that I may have involving drugs or alcohol, including the inappropriate use of medication, to my supervisor and/or manager. In the event I suffer from a substance use disorder, I agree to participate in a rehabilitation or substance abuse treatment program (the "Treatment Program") prior to returning to active duty. I further consent to the disclosure of such Personal Information of mine by the Treatment Program as is necessary for the Company to confirm my ongoing participation in, and successful completion of, such Treatment Program.

THIS AGREEMENT SIGNED this _____ day of _____ 20__ __, in the City of

_____, in the Province of _____.

Signature
Print Name: _____

Witness Signature
Witness Name: _____



SCHEDULE B

FIT DUTY CHECKLIST

DATE: _____

QUESTIONS					
PHYSICAL SYMPTOMS	YES	NO	BEHAVIOURAL SYMPTOMS	YES	NO
Smell of marijuana			Disorientation: Is the worker confused about: Where he/she is?		
Eye drops or mouthwash			What day or time it is?		
Needle marks on arms			Apparent inability to focus on work		
Smell of alcohol on worker's breath			Moody		
Shaking or trembling hands			Ecstatic		
Blank stare or expression			More nervous than usual		
Deteriorating physical appearance			Giddy		
Excessive perspiration			Talkative		
Presence of substances with: Appearance of drugs			Confession that worker was using alcohol/drugs		
Drug paraphernalia			Sudden and/or unpredictable change in energy level		
Eyes:			Change in appearance after lunch or break		
Dilated pupils			Withdrawal/avoidance of peers		
Pinpoint pupils			Complaints from co-workers		
Speech:			Excessive absenteeism, especially Unauthorized/unscheduled absences		
Slurred			Prolonged lunch hours		
Confused			Excessive trips to the restroom		
Fragmented			Unusual high incidence of colds, flu, upset stomachs and headaches		
Slow			Tardiness		
Unusually soft			Unexplained departures from work or job area		
Unusually loud			More than the average number of work-related injuries, incidents or		
Lack of motor coordination			Decrease in efficiency or productivity		
Skin colour:			Careless performance of job		
Pale					
Flushed					
Excessive yawning/Drowsy					
Weariness/ fatigue/ exhaustion					
Sunglasses worn at inappropriate times					
Unusual sneezing/nasal congestion					
Other signs? Explain below:					

EVALUATOR 1 – NAME PLEASE PRINT _____ SIGNATURE: _____

EVALUATOR 2 – NAME PLEASE PRINT _____ SIGNATURE: _____

SCHEDULE C

CONCENTRATION LIMITS

Capitalized terms used in this Schedule C and not otherwise defined shall have the meaning given to them in Total Energy Services Inc.'s *Alcohol and Drug Policy* ("Policy").

Alcohol and Drug test results shall be considered a Positive Test Result when they equal or exceed the Screening Level concentrations set forth below. The chart below outlines the substances that are tested for, their street name and the concentrations. Confirmation Level is the level at which the substance is detected in the body.

Each Division may, with the approval of the Vice President, Operations of Total Energy Services Inc., test for additional substances or at more stringent concentrations. Customer-requested testing substances and concentrations may differ from the below.

Alcohol:

Screening Level	Confirmation Level
0.040 grams per 210 litres of breath (40mg/dL)	0.040 grams per 210 litres of breath (40 mg/dL)

Urine Drug Concentration Limits:

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml
Marijuana metabolite	50	15
Cocaine metabolite	150	100
Opioids		
• Codeine	2000	2000
• Morphine	2000	2000
6-Acetylmorphine	10	10
Phencyclidine	25	25
Amphetamines	500	-
• Amphetamine	-	250
• Methamphetamine	-	250
MDMA ¹	500	250
• MDMA	500	250
• MDA ²	-	250
• MDEA ³	-	250
Hydrocodone/Hydromorphone	300	100
Oxycodone/Oxymorphone	100	100

Oral Fluid Drug Concentration Limits:

Drugs or classes of drugs	Screening concentration equal to or in excess of ng/ml	Confirmation concentration equal to or in excess of ng/ml
Marijuana (THC)	4	2
Cocaine metabolite		
• Cocaine or Benzoyllecgonine	15 -	- 8
Opioids		
• Codeine	30	15
• Morphine	30	15
• 6-Acetylmorphine	3	2
Phencyclidine	3	2
Amphetamines		
• Amphetamine	25	15
• Methamphetamine	25	15
• MDMA ¹	25	15
• MDA ²	25	15
• MDEA ³	25	15
Hydrocodone/Hydromorphone	30	15
Oxycodone/Oxymorphone	30	15

(¹ Methylenedioxyamphetamine; ² Methylenedioxyamphetamine; ³ Methylenedioxyethylamphetamine)