POLICY DEFINITION

Husky Energy ("Husky" or the "Company") is committed to ensuring health and safety at work. All Husky Employees and Contract Workers make a valuable contribution to the success of Husky through safe, efficient and conscientious performance of their duties. The ability of every Employee or Contract Worker to perform his/her particular job duties satisfactorily and safely is critical to that continued success.

Husky recognizes that the use of Illegal Drugs and other Mood-Altering Substances, and the inappropriate use of Alcohol, legal Drugs and Medications can have serious adverse effects on job performance, and ultimately on the safety and well-being of Employees, Contract Workers and customers, as well as the public, and the environment. In light of this, and the safety sensitive nature of our operations, this Policy is intended to outline in further detail the standards and expectations associated with Alcohol and other Drug use, consistent with our overall safety culture.

SCOPE

This Policy applies to all Canadian Regular full-time, part-time and Temporary Husky Employees while they are engaged in Company Business (Safety Sensitive or otherwise), at all times when on Company Premises or Company Worksites, and when operating Company vehicles and equipment. Violations of these provisions may result in Corrective Action up to and including termination of employment.

All Contractor Companies and Contract Workers will be advised of the applicable provisions of this Policy through a Statement of Contractor Requirements, and any contravention will be considered a breach of contract.

Details on the standards and procedures are found in the following sections of the Policy. Key definitions and responsibilities, a medication guideline and an outline of the testing process are found in the Appendices, which form a part of this Policy. The Policy is subject to ongoing review and evaluation, and modifications will be made as deemed necessary to respond to current circumstances and evolving needs. As such, Husky reserves the right, in its sole discretion, to alter, amend, enhance, cancel or replace this Policy at any time.

For definitions of italicized terms, please refer to Appendix I.
1.0 STANDARDS

To ensure a safe, secure, and productive work environment for all individuals, Employees must comply with the following standards, to report Fit for Duty and to remain Fit for Duty throughout their workday/shift. These standards apply when on Company Business, Company Premises and Company Worksites, including when operating Company equipment and vehicles, and when on scheduled standby/"On-Call".

1.1 Drugs and Other Mood-Altering Substances

The following are prohibited:

Illegal Drugs:
- the use, consumption, possession, distribution, transportation, offering or sale of Illegal Drugs and Mood-Altering Substances and related Drug Paraphernalia at any time;
- reporting for work or remaining at work when not Fit for Duty due to the influence of Illegal Drugs; or
- a positive Drug test result as determined through the testing program set out in this Policy;

Legal Drugs:
- substance misuse, which means taking a Mood-Altering Substance or performance enhancing substance for a non-therapeutic or non-medical effect, including inappropriate use of prescription or over the counter Drugs and legal recreational Drugs (i.e. cannabis);
- the use, consumption, possession, distribution, offering or sale of legal Drugs and Mood-Altering Substances and related Drug Paraphernalia, on Company Premises, including in a Company Operating Vehicle. Any possession of these Drugs and/or Mood-Altering Substances on Company Premises is a violation of this Policy, regardless of whether possession is inadvertent or unintentional;
- use or consumption of legal Drugs or Mood-Altering Substances during the workday/shift, including meals and breaks. This includes workdays/shifts spent off Company Premises, including when on travel status, at a training event or seminar or in any other similar business-related situation;
- reporting for work or remaining at work when not Fit for Duty due to the influence of legal Drugs or Mood-Altering Substances;
- the use of legal Drugs or Mood-Altering Substances during a scheduled standby/"On-Call" shift or rotation; or
- a positive Drug test result as determined through the testing program set out in this Policy.
Exceptions to the Above:

- Employees may use or possess Medications in accordance with section 1.3 and Appendix III of this Policy; and
- Employees who are operating a Company vehicle when they are not working (i.e., operating Unlimited Personal Use ("UPU") vehicles) must only do so when they are below the legal Tetrahydrocannabinol ("THC") limits in the relative jurisdiction.

1.2 Alcohol

The following are prohibited:

- the use, consumption, possession, distribution, transportation, offering or sale of beverage Alcohol on Company Premises, including in a Company Operating Vehicle;
- reporting for work or remaining at work under the influence or after effects of Alcohol from any source;
- consumption of any product containing Alcohol (including beverage alcohol) during the workday/shift, including meals and breaks;
- a positive Alcohol test result as determined through the testing program; or
- if the work location is a dry or remote site, the site rules apply with respect to all Alcohol rules.

Exceptions to the Above:

- Employees may use Alcohol after the workday/shift, provided they use Alcohol responsibly and that they are not returning to work. This exception does not apply to dry sites, mobile camps or drilling camps;
- Employees who are operating a Company vehicle when they are not working (i.e., operating Unlimited Personal Use ("UPU") vehicles) must only do so when they are legally able to do so in the relative jurisdiction;
- Employees who are operating a Company vehicle for work purposes must only do so when they are Fit for Duty;
- Employees may consume Alcohol when they leave a dry site; however, they must return to site Fit for Duty and below the legal limit in the relative jurisdiction;
- Alcohol is permitted in Company owned/provided residences (e.g.: Rainbow Lake) and temporary residences. This exception does not apply to dry sites, mobile camps or drilling camps;
- Alcohol may be transported or temporarily stored on Company Premises, including in a personal vehicle parked on Company Premises or in UPU vehicles, provided the Alcohol is in a factory sealed container and, where applicable, locked in the trunk of the vehicle or otherwise appropriately secured. Any Alcohol stored on Company Premises under this exception must be removed as soon
as practicable. This exception does not apply to dry sites, mobile camps or drilling camps.

1.3 Medications

Employees must responsibly use all Medications, including those that are prescribed and over the counter, as directed through a Health Care Professional or in accordance with the product instructions, including the use of related medication equipment (e.g. asthma inhaler). Medications of concern are those that inhibit or may inhibit an Employee’s ability to perform his/her job safely and productively. Further information on Medications can be found in Appendix III.

The following are prohibited:

- reporting to work when not Fit for Duty due to the use of Medication;
- the intentional misuse of Medications (e.g. using the Medications other than as prescribed or directed by a prescribing health professional; using someone else’s prescription Medications; combining Medications and Alcohol use against direction);
- the use or possession of prescribed Medications without a valid prescription; and
- the distribution, offering or sale of prescription Medications (trafficking).

In the interest of health and safety, Employees who need to use Medications are required to do the following:

- act responsibly and use safe alternative Medications choices when available (e.g. non-drowsy);
- if an Employee believes that he/she is not Fit for Duty for any reason, including the effects of Medications, he/she must advise his/her Leader or designate prior to starting work. The Leader will connect the Employee with the Company’s Health Services Provider (the “HSP”) and/or Husky’s Health and Disability Management team. Contact information for the HSP is located in Appendix I; and
- if the Medications they are using may affect their ability to be Fit for Duty, the Employee must consult with the HSP whether the Medications may affect Fitness for Duty for their particular job functions.

The Company reserves the right to confirm the nature and duration of any required work modification through the HSP without any breach of medical confidentiality. If there is any concern about safe performance, a medical work modification may be issued, and the individual may be assigned to alternate duties if available and at the discretion of the Company.
The Company reserves the right to restrict the method of *Medications* consumption to align with Company policies and government bylaws (e.g., smoking bylaws).

The Company reserves the right to implement certain site-specific possession and transportation methods for *Medications* (i.e., Sea Rose Medication procedures).

1.4 Scheduled Standby/ “On-Call”

*Employees* who are on scheduled standby/ “On-Call” rotations are responsible to be *Fit for Duty* consistent with these Policy standards. (i.e., Corporate Response Management Team (CRMT))

1.5 Unexpected Call Out

If unexpected circumstances arise where an *Employee* is requested to perform unscheduled services while under the influence of *Alcohol*, other *Drugs* or *Medications*, or in a condition that could impact safe operations, it is the responsibility of that individual to declare the situation and/or decline the call out, without repercussions. This would include anyone who is on continuous standby (i.e., such as a member of the Corporate Response Management Team (CRMT) or other emergency response team).

2.0 PREVENTION, VOLUNTARY DISCLOSURE, ASSISTANCE, REHABILITATION AND AFTERCARE

2.1 Prevention

The Company recognizes that *Alcohol* and *Drug* dependency are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery. This Policy stresses the importance of prevention and early identification of potential safety and security concerns. The Company maintains a comprehensive support service which provides information, help and support to *Employees* who may have *Alcohol* or *Drug* dependency or other related problems.

2.2 Voluntary Disclosure, Request for Assistance and Rehabilitation

*Employees* who believe that they may have an *Alcohol* or *Drug* problem or dependency must contact the *Health Services Provider* (the “HSP”) at 1-844-299-3380 for confidential assistance before job performance is affected or violations of this Policy occur. *Employees* who request assistance will be referred to HSP and, if deemed necessary, the *Employee* will be subsequently referred to a *Substance Abuse Expert* (“SAE”) for assessment. If required, they will be supported through a treatment and aftercare program consistent with SAE’s recommendations and the applicable benefit coverage. Arrangements for the referral will be made through HSP. Husky will waive the cost-share portion of any referred treatment program for Employees who voluntarily disclose and request
assistance under this Policy. Contact information for the HSP is located in Appendix I.

Temporary Employees who do not have access to these services must contact a Health Care Professional or resources in the community for help with problems impacting work.

2.3 No Corrective Action for Voluntary Disclosure

Employees will not be subject to Corrective Action for voluntarily disclosing an Alcohol or Drug use problem or dependency, seeking assistance under HSP, or undertaking any treatment or counselling prior to any violation of the Policy.

An Employee will be subject to Corrective Action up to and including termination if confirmation of an Employee’s Alcohol or Drug dependency is discovered as a result of the Employee’s breach of this Policy.

2.4 Employee Responsibilities

It is the Employee’s responsibility to seek assistance before performance problems or violations of this Policy lead to Corrective Action up to and including termination.

Employees must comply with the treatment plan recommended by the HSP or following an SAE assessment. Employees should also understand that accessing assistance or declaring an Alcohol or Drug use problem or dependency does not eliminate the requirement to maintain satisfactory performance levels and meet the Fitness for Duty requirements of this Policy. Corrective Action or testing cannot be avoided by a request for assistance with a dependency or by disclosure that the individual is already involved in a treatment program.

2.5 Aftercare

Permanent Employees who complete primary treatment (e.g. residential or out-patient treatment) for an Alcohol or Drug use problem or dependency as a result of a referral from the Company, will be required to participate in an aftercare program when returning to duty in order to help them maintain recovery. All such Employees must enter into a written agreement which will outline the conditions governing their return to the job, and the consequences for failing to meet those conditions. This may include Return to Duty – Post Treatment testing, as set out in sections 3.2.4 and 3.2.5 of this Policy.

Where a medical professional, SAE, or other certified and recognized counselling professional advises that there may be a risk that would prevent an Employee from doing their job safely, a medical work modification may be issued, and the individual may be assigned to alternate duties if available and at the discretion of the Company.
2.6 Confidentiality

Confidentiality will be maintained except where limited disclosure is necessary for related health, safety and performance concerns (e.g., there is deemed to be a potential for risk to self, others or the Company). That is, only the information strictly limited to the level of functionality of a worker (e.g., Fit for Duty and any restrictions that may apply, and performance concerns) may be shared with the Employee’s Leader for purposes of determining Fit for Duty, appropriate work accommodation, dealing with performance issues and/or return to work initiatives. Any disclosure will comply with Husky’s Privacy Policy.

3.0 GUIDELINES FOR INVESTIGATIONS AND TESTING

3.1 Fitness for Duty Investigations

Where an Employee appears to be in a condition where they are not Fit for Duty, an investigation will take place. The Employee will be escorted to a safe/private place and given an opportunity to explain why they do not appear to be Fit for Duty. If the Employee fails to provide a reasonable explanation as to why he/she is not Fit for Duty, appropriate action will be taken, which may include any or all of the following:

- referral for medical attention at the site medical services centre, a health or medical centre or local hospital as appropriate;
- referral for an alcohol and drug test based on reasonable cause; and
- any other action appropriate to the situation.

Further details on reasonable cause testing are located at section 3.2.2.

3.2 Alcohol and Drug Testing

All Employees are subject to testing in the following circumstances. Further information on testing procedures is in Appendix IV. Any Refusal to Test, as defined in Appendix I, is a violation of this Policy.

3.2.1 Pre-Employment/ Applicant Testing

As a final pre-condition of qualification for a Safety Sensitive Position, all applicants are required to undergo an Alcohol and Drug test. This requirement must be met by external applicants, as well as Employees who currently do not hold a Safety Sensitive Position. Testing is not required for current Employees that hold a Safety Sensitive Position. Failure to pass the test or Refusal to Test means the individual will not be eligible for the position.

Rehires with a break in service with the Company of greater than 90 days will be required to be retested prior to commencing a Safety Sensitive Position. Husky retains the right to request site access testing at intervals of less than 90 days.
3.2.2. Reasonable Cause

Testing will take place whenever a Leader has reasonable grounds to believe that the actions, appearance or conduct of an on-duty Employee are indicative of the use of Alcohol or Drugs. The decision to test shall be made by a Leader, in consultation with another Company representative (e.g. Manager, Safety Advisor, Human Resources etc.).

The basis for the decision will be documented as soon as possible after action has taken place. The referral for a test will be based on indicators including, but not limited to:

- observed use or evidence of use of a substance (e.g. smell of Alcohol);
- erratic or atypical behaviour or changes in behaviour;
- changes in physical appearance or speech patterns; or
- other observations that suggest Alcohol or Drug use may be a factor.

Individuals tested in this circumstance will be removed from duty until the investigation is complete. Depending on the test result, a fitness for work assessment may also be required through HSP before allowing the Employees to return to work.

3.2.3. Post Incident or Near Miss

Alcohol and Drug testing may be required after any Incident or Near Miss as part of a full investigation unless there is immediate evidence that the acts or omissions of Employees could not have been a contributing factor (e.g. structural or mechanical failure, or environmental factors). The decision to test shall be made by a Leader, in consultation with another Company representative (e.g. Manager, Safety Advisor, Human Resources etc.).

The following procedures apply:

- the decision to test will be made as soon as possible after the triggering event;
- arrangements for testing will be made as soon as possible unless immediate medical attention is required;
- the need for a test must be documented as part of the preliminary investigation as soon as practical after the triggering event;
- Employees referred for a test will only be those who are identified as having been directly involved in the chain of acts or omissions leading up to the event; and
- should there be a delay in testing, Employees to be tested must not consume Alcohol or any other substance or product that would impact testing results until after the test has been completed, or they are advised that a test is not required. The only exceptions, if
required, are previously prescribed Medications (as directed), or Medications administered in the treatment of an acute injury resulting from the triggering event.

Employees must advise their immediate Leader as soon as possible after the Incident and participate fully in any subsequent investigation. Failure to report involvement in an Incident is a violation of this Policy.

For more information about Incident reporting, please refer to HOIMS Element 7 Standard and Procedure, available on HuskyNet.

3.2.4. Return to Duty - Post Violation

In those situations where employment is continued after a Policy violation, individuals will be required to complete a Fit for Duty assessment and may be subject to unannounced testing as a condition of continued employment as set out in an agreement with the Company.

3.2.5. Return to Duty - Post Treatment

Employees will be required to prove they are Fit for Duty and the Employee will be subject to unannounced testing as set out in an agreement with the Company.

Such return to duty and post treatment testing will be conducted in accordance with the HSP and the SAE's recommendation.

3.3 Possession of Alcohol, Drugs or Drug Paraphernalia

The Company reserves the right to investigate any situation where there are reasonable grounds to believe that banned substances or devices/products are present on Company Premises or Company Worksites in violation of this Policy. Investigations may include unannounced inspections of Company Premises, Company Worksites and vehicles. Leaders are responsible for identifying situations where a search of an individual or his/her belongings is justified based on a combination of indicators which could include but are not limited to:

- Employee behaviour,
- Odour;
- Presence of Drug Paraphernalia; and
- Identification by a scent trained canine.

Leaders will be responsible for advising Corporate Security about the situation, and Human Resources as soon as possible.

Investigations will be directed by Corporate Security whenever possible, will be in accordance with applicable laws and agreements, and may be undertaken in cooperation with appropriate law enforcement agencies when required. Any subsequent action taken will be based on all relevant
factors including the safety threat and the job requirements. Any Employee who fails to cooperate with a Company authorized search will be subject to appropriate Corrective Action up to and including termination.

3.4 Loss of Drivers' License/ Impaired Driving Charge or Suspension

All Employees who require a drivers' license for their job must inform their Leader immediately if they lose their drivers' license for any reason. In addition, Employees must advise their Leader immediately (or as soon as reasonably possible) if they have been charged with an impaired driving offense under the Criminal Code of Canada or have received an administrative drivers' license suspension under provincial legislation when operating a vehicle or driving on behalf of the Company.

Impaired driving includes but is not limited to: testing over the legal Blood Alcohol Content (BAC)/THC levels in that jurisdiction; driving while impaired; and refusing to blow into a breath analyzer or provide a sample for testing. If an individual receives a charge or sanction while operating a Company vehicle or while driving on behalf of the Company, there will be an investigation undertaken, and action taken will be appropriate to the situation. This may result in a referral to the HSP for an assessment by an SAE depending on the situation. It may also result in Corrective Action up to and including termination. Failure to report the charge or sanction will be grounds for Corrective Action up to and including termination.

4.0 SOCIAL SITUATIONS

4.1 Company Sponsored Social Events

In the case of any Company sponsored social event, appropriate regard will be taken for the safety and well-being of the individuals present and the community. Responsible Alcohol use is permitted at Company sponsored social functions held away from Company Premises, which must have the prior approval of a Vice President, or higher-level Leader. A Senior Vice President’s approval is required if the function is held on Company Premises. (e.g. 5th floor conference rooms in Western Canadian Place) Anyone who attends and consumes Alcohol must not be returning to or going to work, including returning to Company Premises or Company Worksites, after the event and is required to follow the policies regarding Alcohol and vehicle use as set in section 1.2 of this Policy. Alcohol is not permitted at Company sponsored social functions held at dry work sites.

The use of other legal recreational Drugs, including but not limited to cannabis, is not permitted at Company sponsored social functions, regardless of whether or not those functions are held at Company Premises. For further details on the rules regarding Alcohol and Drugs, refer to sections 1.1 and 1.2.

4.2 Business Hosting

Consistent with the above, if Alcohol is made available to guests in the course of conducting business (e.g. restaurant meeting), Employees must
use judgment and be responsible in hosting others. The use of legal recreational Drugs is not permitted while in the course of conducting business (e.g. restaurant meeting). For further details on the rules regarding Alcohol and Drugs, refer to sections 1.1 and 1.2.

5.0 CONSEQUENCES OF A POLICY VIOLATION

5.1 General Requirements

All Employees must be accountable for their actions, including Employees who may have an Alcohol or Drug problem or dependency. Any violation of the provisions of this Policy may result in Corrective Action up to and including termination of employment. Management has the authority and discretion to remove an Employee from the worksite, with or without pay, where that Employee is believed to have violated the Policy. Determination of the appropriate corrective measure will depend on a variety of factors including but not limited to the nature of the Policy violation and the severity and consequences resulting from the Policy violation.

Any confirmed situation of Drug trafficking on Company Premises will result in termination of employment.

A positive Alcohol or Drug test or a Refusal to Test are both considered a violation of this Policy.

An Employee who has a positive Alcohol or Drug test in a reasonable cause, post Incident or Near Miss situation will be removed from duty until considered safe to return (at a minimum not before their next workday/ shift or shift) and may be subject to Corrective Action up to and including termination.

5.2 Conditions for Continued Employment

Should the Company determine that employment will be continued in a specific circumstance following a Policy violation, the Employee will be required to enter into an agreement governing his/her continued employment which may require any or all of the following actions, or any other condition appropriate to the situation:

- adherence to any recommended treatment and aftercare program;
- maintenance of sobriety and satisfactory performance on return to duty;
- successful completion of a Fit for Duty test;
- ongoing unannounced testing for a period determined on a case by case basis considering the recommendations of SAE;
- adherence to any rehabilitation conditions or requirements set forth by the HSP and SAE; and
- no further violations of the Policy during the monitoring period.
Failure to meet the requirements of the agreement during the monitoring period will be grounds for Corrective Action up to and including termination.
APPENDIX I: KEY DEFINITIONS

i. **Company Business** refers to all business activities undertaken by Employees in the course of the Company's operations, whether conducted on or off Company Premises.

ii. **Company Operating Vehicle** refers to all Unlimited Personal Use ("UPU"), Work Purpose Only ("WPO"), Shared Pool and Department Pool vehicles leased or owned by Husky, in accordance with and defined by Husky's Vehicle Policy – Corporate.

iii. **Company Premises** includes but is not restricted to all land, buildings, structures, aircraft, Fixed Base Operations ("FBO"), vessels and vehicles or mobile equipment owned, leased or otherwise directly controlled by the Company for purposes of conducting Company Business.

iv. **Company Worksite** includes any site or location where an Employee or Contract Worker has been assigned to work, including customer owned or controlled premises.

v. **Contractor Company** refers to any company that has been contracted, sub-contracted, or otherwise engaged to provide services to Husky on a fee for service basis and places its employees or subcontractors with Husky in order to fulfill that contract.

vi. **Contract Worker** refers to any person that has been contracted, sub-contracted, or otherwise engaged to provide services to Husky on a fee for service basis. **Contract Worker** includes both dependent and independent contract workers.

vii. **Corrective Action** means any measures to correct, modify or prevent unacceptable Employee behavior, including but not limited to removing an Employee from service, requiring the Employee to complete additional steps or testing prior to returning to the workplace, requiring the Employee to complete additional steps or testing following a return to the workplace, and termination of the employment relationship.

viii. **Drug** means any chemical or substance, including medications, illegal drugs, alcohol and other mood-altering substances, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this Policy, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.

a. **Medication** means a chemical or substance used for medical treatment, including over the counter and prescription medication.

b. **Illegal Drug** means any chemical or substance which is not legally obtainable, or which is prohibited by law from use, sale, possession, purchase or transfer.

c. **Alcohol** means any form of beer, wine or distilled spirits, or any beverage containing alcohol, and includes the intoxicating agent found in medicines or other products.

d. **Mood-Altering Substance** means any chemical or substance, legal or illegal, which results in cognitive or physical limitations that negatively impact job performance (e.g. non-medical cannabis, 'bath salts', dodo, solvents, khat, inhalants, steroids).
ix. **Drug Paraphernalia** refers to any personal property which is associated with the use of any drug, substance, chemical or agent. This would also include any product or device that may be used to attempt to tamper with a testing sample. **Drug Paraphernalia** does not include paraphernalia associated with the prescribed use of a medication (e.g. inhaler used for asthma).

x. **Employee** includes any person employed by the Company in a permanent or temporary capacity and who is on the Company payroll.

xi. **Fitness for Duty or Fit for Duty** means being able to safely and acceptably perform assigned duties without any limitations due to the use or after effects of Drugs, Alcohol, Illegal Drugs, Medications or other Mood-Altering Substances.

xii. **Health Care Professional** includes but is not limited to a physician, pharmacist, dentist, etc. who may provide guidance on the implications of Medication use.

xiii. **Health Services Provider or "HSP"** refers to confidential services provided by a comprehensive team including but not limited to occupational health nurses and counsellors, addiction assistance, disability management and support services, etc. for the purposes of supporting and managing health related issues impacting an Employee. For HSP assistance, please call 1-844-299-3380.

xiv. **Incident** is defined as an unusual or unexpected event or emergency, which either resulted in, or had the potential to injure people, adversely impact the environment, damage property or assets, interrupt process operations, or negatively affect the Company's reputation. *Incidents* are classified as, minor, moderate, serious or critical based on consideration of actual or potential consequences. Refer to the "Corporate Incident Management Procedure" for additional details.

xv. **Leader** means the individual accountable for a particular area or shift, including managers, and others in supervisory positions who are directly responsible for the performance of individuals.

xvi. **Medical Review Officer or MRO** is a licensed physician responsible for receiving and evaluating laboratory results generated by a Company's Drug testing program, who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual's positive test result together with his/her medical history and any other relevant biomedical information.

xvii. A **Near Miss** is defined as an unusual or unexpected event or emergency had the potential to cause personal injury, adverse impact on the environment, or a reduction in asset value or Company reputation occurs. A **Near Miss** is often called a "no-loss", "near hit" or "close call" but still has the potential to adversely affect the environment, people or assets. *Near Miss Incidents* are classified as, minor, moderate, serious or critical based on consideration of actual or potential consequences. Refer to the "Corporate Incident Management Procedure" for additional details.

xviii. **Program Administrator** is the Company's Health & Disability Management Advisor (Human Resources department) and has responsibility for ongoing management of the Alcohol and Drug testing program by:
a. bringing consistent administration to the HSP, disability management and vendor management;
b. making arrangements for Employee referrals to the HSP for the purpose of assessment by an SAE, as required under the Policy;
c. providing compliance oversight to an Employee’s written agreement as it pertains to post treatment and ongoing testing requirements;

xix. **Refusal to Test** would include an Employee:

a. failing to report directly for a test or refusal to submit to a test;
b. failing to provide a valid specimen absent a documented medical condition;
c. attempting to tamper with a test sample;
d. refusing to agree to disclosure of a test result to the Company Program Administrator;
e. attempting to avoid a test by failing to report involvement in an Incident or Near Miss which may require testing or by avoiding management following involvement in an Incident or Near Miss;
f. failing or refusing to attend a medical evaluation where required under the Policy; and,
g. attempting to disrupt the testing process as described in the Policy.

xx. **Safety Advisor** supports Leader in meeting their responsibilities herein and assists with Policy application and interpretation.

xxi. **Safety Sensitive Positions** are positions with duties and responsibilities that expose the worker to significant hazards, such that even a momentary lapse of attention (whether by impaired performance, judgment or perception) would reasonably be expected to have a direct negative impact upon the health or safety of Employees, Contractor Companies, Contract Workers, customers, the public, or the environment, or could lead to significant property damage.

This includes Employees who are required to temporarily fill in for individuals in Safety Sensitive Positions.

Leaders and senior managers who direct workers in Safety Sensitive Positions (even if the Leader or senior manager is not based at the same site), or who perform the same duties or exercise the same responsibilities as their reports in Safety Sensitive Positions are also deemed to hold Safety Sensitive Positions. Department managers are responsible for determining and documenting which positions are Safety Sensitive Positions. Human Resources will provide advice when requested.

Husky reserves the right to classify additional positions as Safety Sensitive dependent on the hazards of the worksite, and regardless of the particular duties and responsibilities associated with any particular position.

xxii. **Substance Abuse Expert** or SAE means an individual with knowledge of and clinical experience in the diagnosis and treatment of Alcohol and Drug related disorders. The SAE will assess if the individual has an Alcohol or Drug dependency, make recommendations regarding education and treatment, and recommend a return to duty monitoring program including unannounced testing.
APPENDIX II: RESPONSIBILITIES

All Employees must perform their job in a safe manner, consistent with established Company practices. In accordance with these expectations, all Employees must:

- read and understand the Policy and their responsibilities under it;
- report for work only if Fit for Duty for any and all scheduled duty, and remain Fit for Duty while on Company Business, Company Premises and Company Worksites in compliance with the standards set out under this Policy;
- remain Fit for Duty in compliance with the Policy while on scheduled standby "On-Call";
- consult with the Company's Health Services Provider (the "HSP") whether the Medications can affect Fitness for Duty for their particular job functions, if the Medications they are using may affect their ability to be Fit for Duty;
- follow appropriate treatment if they have a current or emerging Alcohol or Drug dependency, and follow recommended monitoring programs after attending treatment;
- co-operate with any work modification related to safety concerns;
- immediately report unsafe acts or conditions to a Leader; and
- co-operate with an investigation into a suspected violation of this Policy, including any request to participate in the testing program.

All Employees are responsible for a safe work environment and the health and safety of co-workers. Without fear of repercussion, Employees must to intervene as appropriate, including reminding a co-worker they can access assistance before an Alcohol or Drug problem impacts performance or safety.

Human Resources is responsible for:

- consistent administration of the Policy as it pertains to their role;
- resolution of any questions of interpretation;
- supporting Leaders in meeting their responsibilities;
- making arrangements for Employee referrals to the HSP for the purpose of assessment by an SAE;
- coordinating development and delivery of Employees education and Leader training programs; and
- providing compliance oversight with regard to an Employee’s written agreement as it pertains to post treatment and ongoing required testing.

Leaders are responsible for:

- understanding the Policy, their responsibilities and the referral procedures;
- applying the Policy in a fair and consistent manner;
- ongoing performance management to ensure safe operations and effectiveness of the program;
- guiding Employees who seek assistance for a personal problem to appropriate resources (e.g. HSP) while maintaining confidentiality under the circumstances (see the Privacy Policy 5.02);
• advising the Program Administrator if an Employees says he/she has a problem with Alcohol and/or Drugs so that arrangements for an assessment can be made;
• taking appropriate steps to investigate any possible violation of the standards set out under this Policy;
• making referrals for an Alcohol and Drug test in a post Incident, Near Miss or reasonable cause situation as and when required to do so under this Policy; and
• monitoring and ensuring compliance of contract workers.

The duties, responsibilities and expectations for Contractor Companies and Contract Workers are contained in the Contractor Statement of Requirements.
APPENDIX III: GUIDELINE ON MEDICATIONS

All Employees are required to manage potential impairment during working hours due to the legitimate use of Medications. Employees are required to consult with Health Care Professional, or the Company's designated HSP to determine if use of the Medication may have any potential negative impact on job performance for their particular job functions. If the Medication they are using may affect their ability to operate safely, they are required to take appropriate action to minimize safety risk by advising HSP and their Leaders of any need for modified duties. The Company reserves the right to confirm the nature and duration of any required work modification without any breach of medical confidentiality.

The following medication categories have been associated with performance impairment and are provided as a guideline to Employees in assessing their own situation. The list is not exhaustive; there are numerous other over the counter and prescription drugs which when taken may impact negatively on performance. Husky reserves the right to add additional medications to the following list:

a. Antihistamines - are widely prescribed for hay fever and other allergies (e.g. Allegra, Dimetane). They are also found in many cold medications. These medications may cause drowsiness.

b. Motion Sickness Drugs - are used to prevent motion sickness and nausea (e.g. Gravol, Antivert). Side effects may include drowsiness.

c. Barbiturates, Sedatives, Hypnotics, Tranquilizers, Antidepressants - are used to treat sleep disorders and depression (e.g. Ativan, Imovane, Paxil). Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.

d. Narcotics - (e.g. Demerol, Codeine). Codeine is often found in combination drugs such as 222s or 292s or Tylenol 1, 2, 3s. Drowsiness, dizziness, and lightheadedness may be side effects.

e. Stimulants - Medication used for central nervous system stimulation and for appetite suppression can produce sensations of well-being which may have an adverse effect on judgment, mood and behaviour (e.g. amphetamines or medications sold as 'diet pills').

f. Anticonvulsants - are used to control epileptic seizures and can cause drowsiness in some patients (e.g. Dilantin).

g. Muscle Relaxants - are used to treat musculoskeletal pain. (e.g. Flexeril, Robaxisal). Most common side effects are sedation and drowsiness.

h. Cold Tablets/ Cough mixtures - in particular nighttime remedies can cause drowsiness (e.g. Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).

i. Medical Cannabis - under the Access to Cannabis for Medical Purposes Regulations, physicians may authorize cannabis for treatment purposes. Its use
can present serious negative impacts on performance at work, including impairment of the ability to drive, operate machinery and overall workplace safety.
APPENDIX IV: ALCOHOL AND DRUG TESTING PROCEDURES

The Alcohol and Drug testing process is based on rigorous collection, analysis and reporting procedures designed to ensure the accuracy and integrity of the results. Steps in the testing process are highlighted below.

- Testing will be conducted in those circumstances outlined under the Company Policy to determine the presence impairing Drugs including but not limited to cannabinoids, amphetamines/ methamphetamine, cocaine, opiates, phencyclidine and alcohol.

- Collection of specimens for Drug testing and administration of Alcohol tests will be performed by trained collection agents. In post Incident, Near Miss and reasonable cause testing situations, samples will be collected as soon as possible after the triggering Incident, but collection attempts will end eight (8) hours after the Incident for an Alcohol test, and thirty-two (32) hours after the Incident for a Drug test.

- All Employees who are tested are required to sign a form to acknowledge the accuracy of the Employee and collector information and authenticity of the specimen(s). Employees will be given copies of the applicable custody/ control and testing documents for their records.

- Alcohol tests will be administered by a calibrated evidential breath analyzer with a printout of test results. Drug tests will be administered by urinalysis using split sample collection for transfer to the laboratory or using a Point of Collection (quick test) urine Drug screen at the collection site with confirmation testing at the lab should it be required. A 'point of collection' (quick test) urine Drug screening test can be administered in a reasonable cause, post Incident testing situation or Near Miss, provided appropriate adulterant checks are utilized and any result that is not negative is forwarded to a laboratory for confirmation analysis. 'Point of collection' oral fluid testing devices may be used as initial screening devices only where positive screening results are followed up via urinalysis confirmation testing.

- All laboratory testing will be conducted by a fully qualified and accredited laboratory performing a confirmation test by gas chromatography/ mass spectrometry (GC/ MS).

- Laboratory confirmed positive Drug test results will be reviewed by a qualified Medical Review Officer (MRO). The Employee concerned will be given an opportunity to explain the finding to the MRO who will then determine whether the result will be reported to the Company Program Administrator as a negative, or verified positive, or a tampered or substituted specimen result.

- In the case of a verified positive Drug test result, or a tampered or substituted finding, the Employee may ask the MRO to require the split sample to be tested within seventy-two (72) hours of receiving their results. Where split samples are not collected, the donor can request that their original sample be reanalyzed.

- If the test is reported as dilute and negative, or cancelled because the specimen is invalid, the Employee will be required to provide an additional specimen for testing as soon as possible.
• All test results (e.g. positive or negative) will be reported directly to the Company's 
Program Administrator or designate and will remain confidential except for release in 
accordance with this Policy in situations affecting the health and safety of workers and the 
public, or as required by order of a tribunal or court.

• For the purpose of this Policy, and for both Safety Sensitive and non-Safety Sensitive 
positions, the following are positive tests:
  • Alcohol: any positive blood alcohol content (urine concentration);
  • Drugs: at or exceeds the cut off levels which have been established by Husky with 
reference to workplace testing standards throughout North America, as amended 
from time to time.

• Any positive test result will be considered a violation of this Policy, whether or not the 
Drugs or Alcoholic beverage were actually consumed on Company Business, Company 
Premises, or Company Worksites. Failure to report directly for a test, refusal to submit to 
a test, refusal to agree to disclosure of a test result to management or an attempt to tamper 
with a test sample are violations of the Policy.

Husky reserves the right to revise, interpret, or terminate any or all provisions of this Policy 
at any time as deemed necessary.

APPROVED by Husky executive on behalf of the Corporation effective the 1ST 
day of 
October 2018.

Nancy F. Foster
Senior Vice President,
Human and Corporate Resources