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|---|--------------------------------|--------------------------------|-----------------------------|
|  | <b>COMPANY POLICY</b>          | Reference No                   | HSE-02                      |
|   |                                | Effective Date                 | 1 <sup>st</sup> August 2023 |
|   | <b>ALCOHOL AND DRUG POLICY</b> | Date last Reviewed/<br>Updated | Initial                     |
|   |                                | Version #                      | 1.00                        |

### Purpose

At CPL Group, we are committed towards reducing the risks to health and safety across all our Business Operations. We recognise that the use of illegal drugs and alcohol during work hours affects an employee's ability to think and behave rationally and consequently impairing their ability to carry out their duties safely and effectively. This policy applies to all employees, contractors, and visitors.


### Policy

The CPL Group has a zero-tolerance stance for the use and misuse of alcohol and illegal drugs in the workplace. Therefore;

- All alcohol tests should indicate a "Blood Alcohol Content" (BAC) of 0.00%.
  - All drug and illegal substances test should indicate "Negative".
- I. Consumption of alcohol and or illegal drugs and substances is prohibited on CPL premises and whilst engaged in external CPL related activities unless otherwise approved.
  - II. Possession of illegal drugs and substances on company premises is prohibited.
  - III. All employees are subjected to Random Alcohol, Drug and other Illegal Substances Testing without notice by CPL Authorised Personnel.
  - IV. The chewing of betel nut with lime and mustard is prohibited during working hours and within CPL premises including its' vehicles.
  - V. Employees using prescription drugs or over-the-counter medications for medical treatment must consult with their supervisor or manager to ensure side effects of use do not adversely affect occupational health and safety or work performance.
  - VI. The manager/supervisor, if they have reasonable grounds for believing that an employee is incapable of safely performing their duties or may be a risk to others due to the effects of drugs or alcohol, must arrange with the Department for testing and arrange for safe removal from the workplace.

The Company will raise awareness of alcohol and drug issues in the workplace. This awareness raising will include providing information leaflets, information on staff notices boards and /or be included on the wellbeing pages on the intranet.

Non-compliance of this Policy is considered serious misconduct and will result in termination and or prosecution.

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## PROCEDURE

### REQUIRED TESTING

#### 1. *Random Testing*

Random alcohol breath testing and saliva swabs will be conducted by the Safety Department without prejudice for

- Fleet Drivers
- Mobile Equipment Operators / Forklift Operators / BOPT Operators.

#### 2. *Reasonable suspicion*


Employees are subject to testing based on, but not limited to, observations of apparent workplace use, possession, or impairment by at least two members of management. P&C, the branch/department manager or manager of operations should be consulted before sending an employee for testing. Management must use the reasonable suspicion observation checklist to document specific observations and behaviours that create a reasonable suspicion that an employee is under the influence of illegal drugs or alcohol. Examples include:

- Odors (smell of alcohol, body odor or urine).
- Movements (unsteady, fidgety, dizzy).
- Eyes (dilated, constricted or watery eyes, or involuntary eye movements).
- Face (flushed, sweating, confused or blank look).
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts).
- Emotions (argumentative, agitated, irritable, drowsy).
- Actions (yawning, twitching).
- Inactions (sleeping, unconscious, no reaction to questions).

When reasonable suspicion testing is warranted, both management and P&C will meet with the employee to explain the observations and the requirement to undergo a drug and/or alcohol test within two hours. Refusal by an employee will be treated as a positive drug test result and will result in immediate termination of employment.

#### 3. *Post-accident*

Employees are subject to testing when they cause or contribute to accidents that seriously damages a CPL vehicle, machinery, equipment, or property or that results in an injury to themselves or another employee requiring offsite medical attention. A circumstance that constitutes probable belief will be presumed to arise in any instance involving a work-related accident or injury in which an employee who was operating a motorized vehicle (including a CPL forklift) is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place within two hours following the accident, if not sooner. Refusal by an employee will be treated as a positive test result and will result in immediate termination of employment.

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### Type of Tests

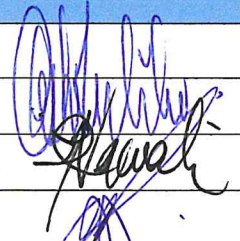
#### Alcohol

- I. A personal breath tester (Alcolizer – Easy Check) will be used to test blood alcohol levels at random occasions during normal shifts.

Employees found to be over the required blood alcohol content percentage of 0.00% BAC will be immediately removed from site and suspended pending investigation and disciplinary action.

#### Illegal Drugs and Substances

- I. Sniffer dogs will be used at the Distribution Centre main site entry point to sniff out illegal drugs and substances.
- II. Suspected employees will be required to undergo body and bag search.
- III. If found to be in possession of illegal drugs and substances, employee will be immediately suspended from work, refused entry into worksite pending investigation, and necessary disciplinary actions are completed including up to reporting matter to Police.
- IV. Whereas, in work sites where sniffer dogs are not used. Any employee suspected with reasonable doubt to be under the influence of illegal drugs and substances will be subjected to leave work site and undergo a drug test arranged by CPL.
- V. Employee/s involved in a workplace incidents and accidents are subjected to undergo blood test if such substance has influenced reasonable judgment.

| Statement of Policy |   |   |
|---------------------|---|---|
| <b>Issue to:</b>    | All Business / Retail Units of CPL Group and its Subsidiaries |  |
| <b>Issued by:</b>   | GM Health and Safety  |   |
| <b>Reviewed by:</b> | GM People and Culture   |   |
| <b>Approved By</b>  | CEO CPL Group Limited   |   |