

Fitness For Work Policy

2023

Revision History

Revisions	Effective Date	Reasons for Revision
Revision No.		
Original Version	June 10, 2015	New Policy
Revision 1	July 1, 2018	Policy updates following periodic review schedule
Revision 2	December 1, 2020	Policy updates following periodic review schedule
Revision 3	May 31, 2023	Convert to new template, separate policy from procedures, and incorporate recent legislative changes

1. Purpose

The health and safety of its prospective and current Employees and protecting Workers from injury and occupational illness is of paramount importance to Harvest Operations Corp. (“**Harvest**”). Harvest has established this Fitness for Work Policy (“**Policy**”), including Alcohol & Drug (A&D) Guidelines and Fatigue Management Guidelines, in order to manage workplace hazards and reduce the risks associated with impairment on the job. In accordance with this Policy and attached Guidelines, Harvest will take every reasonable precaution to provide a safe and efficient Work environment for all Workers on Harvest Premises, while ensuring individuals are treated fairly and with respect.

Harvest recognizes that impairment caused by fatigue, stress, Alcohol and Drug misuse or abuse by Workers on Company Premises, or other sources can adversely affect job performance, the Work environment, and the safety of Harvest Employees, Contractors, customers, and the general public. Such impairment can also negatively impact the environment and both private and public property.

Harvest recognizes that hazards and risks associated with fatigue, stress and impairment are different in a corporate environment as compared to worksites designated as Safety Sensitive Work Locations and the Guidelines established in accordance with this Policy reflect this.

Harvest is committed to maintaining a healthy and respectful workplace as required under the *Alberta Occupational Health and Safety Act* and the *British Columbia Occupational Health and Safety Regulation* (including any related regulations and codes) while meeting other legal obligations, including the duty to accommodate disabilities to the point of undue hardship in accordance with the *Alberta Human Rights Act* and *British Columbia Human Rights Code*. Harvest also recognizes the need to balance safety and security responsibilities with Workers’ reasonable expectations of privacy. Harvest will work to ensure confidentiality and protect the privacy rights of all Workers with respect to the application of this Fitness for Work Policy.

This Policy is a tool in Harvest’s Environment Health and Safety Management System to help identify Drug or Alcohol use and for the treatment and return to Work of Employees with substance abuse disorders.

2. Definitions

Capitalized words and phrases used in this Policy and the attached Guidelines and Appendices, as well as in notices and communications made pursuant to this Policy will have the meanings set out in **Schedule “A” (Definitions)**, unless otherwise defined in this Policy.

3. Scope and Application

This Policy sets out responsibilities and standards regarding Fitness for Work. All Harvest Employees and Contractors, when on Company Premises or when carrying out Harvest Business, are expected to report Fit for Work and remain Fit for Work throughout their workday or shift.

While working at Safety Sensitive Work Locations or when performing functions in positions designated as Safety Sensitive Positions, whether on a regular or temporary basis, Harvest Employees and Contractors are expected to meet higher standards of safety as compared to other locations and positions, due to the greater risk involved in this Work. These standards are set out in this Policy and the accompanying Guidelines.

Contractors will be advised of the provisions of this Policy applicable to them and will be expected to comply with these requirements for their Employees, sub-contractors and agents. Contractors should refer to the **Fit for Work – Contractor Guidelines**.

Violations of this Policy or the accompanying Guidelines may result in disciplinary action up to and including termination of employment for Employees and will be considered a breach of contract for Contractors, which can result in suspension or termination of the contract.

4. Fit for Work Assessments and Accommodation

Employment with Harvest in a Safety Sensitive Position will be conditional upon the outcome of the pre-assignment Fit for Work assessment. The nature of such assessment and the differences between assessments conducted for candidates versus existing Employees is set out in more detail in the **Fit for Work Assessments and Accommodation Guidelines**.

5. Fatigue Management Guidelines

Fitness for Work includes having sufficient rest so as not to be impaired by fatigue. Workers should have sufficient sleep to enable them to carry out their Work safely. All Harvest Employees and Contractors, when on Company Premises or when carrying out Harvest Business, are expected to comply with this requirement.

The management of fatigue is a shared responsibility between Harvest management and each individual. The objective of the Fatigue Management Guidelines is to reduce workplace hazards due to fatigue. Fatigue management plans are required for Harvest field-based positions designated as Safety Sensitive in order to assist in assessing the causes of fatigue and mitigating the related hazards. See the **Fatigue Management Guidelines** for more detail on the preparation of such plans.

6. Alcohol & Drug (A&D) Guidelines

Fitness for Work includes being free from impairment caused by the use or misuse of Drugs (whether prescription, Non-Prescription, legal or Illegal) and Alcohol.

The **Alcohol & Drug Guidelines** set out Harvest's policy and guidelines on Alcohol and Drugs, including but not limited to the following:

- the use of Drugs and Alcohol;
- general prohibition against the possession or sale of Drugs and Alcohol;
- exceptions for the consumption and possession of Alcohol;
- implications for Safety Sensitive Positions and Safety Sensitive Work Locations;
- Searches and testing for Drugs and Alcohol;
- impaired driving; and
- the possession or use of Medications.

7. Responsibilities

Responsibility for the successful implementation of this Policy and Guidelines is shared by all of the following.

7.1 Employees, Management and Supervisors

Employees/Contractors

Harvest Employees and Contractors are responsible for:

- Reporting to Work Fit for Work and remaining so during all Work time.
- Reading, understanding and complying with this Policy and its Guidelines.

- Co-operating with any investigation into a possible violation of this Policy and its Guidelines, including reasonable Searches of a Worker's Work area, personal effects and/or vehicles.
- Notifying their Supervisor, if not Fit for Work.
- Monitoring co-workers for signs and symptoms of fatigue and other causes of impairment.
- Telling their Supervisors about personnel unfit for Work issues or reporting such issues to their Supervisors.
- Being aware of Harvest's Employee and Family Assistance Program (EFAP), which is designed to help Employees experiencing personal problems such as A&D abuse. Employees are expected to seek assistance before a health condition or substance use issue results in impairment in the workplace or performance issues.

Management and Supervisors

Harvest Management are responsible for:

- Providing a safe workplace.
- Coordinating Work in a way that recognizes hazards associated with fatigue and implementing controls to mitigate the risks. This includes providing self-assessment tools to Employees. For each activity that needs to be performed, Harvest will carry out a risk assessment, identify if alertness is an issue, and determine what the consequences would be if there were a failure.
- In camp Work settings, the design, location and maintenance of the sleeping quarters and overall camp design will be considered with the objective of facilitating restful sleep.
- Utilizing a qualified and competent third-party contractor to administer and conduct accurate and confidential A&D Testing services that comply with the A&D Testing procedures found in Energy Safety Canada's Canadian Model for Providing a Safe Workplace (Version 6.1 – May 1, 2023) and Harvest's Privacy Policy.
- Implementing and maintaining this Policy and its Guidelines across all departments.
- Providing programs that emphasize awareness, education, and training with respect to the dangers caused by impairment in the workplace.
- Assisting Employees in obtaining assessment, counselling, referral, and treatment to address impairment issues through Harvest's EFAP Program.
- Providing a safe and confidential environment for Employees to self-disclose a substance addiction or dependency before a Significant Incident or violation of this Policy without fear of termination or discipline.
- Supporting Treatment Programs and return to Work opportunities where applicable.
- Ensuring Supervisors receive training and access to resources to recognize Worker impairment and to assist in managing this Policy.
- Ensuring testing for A&D is used only for legitimate Work-related purposes and that information is collected, used and disclosed only in accordance with Harvest's Privacy Policy.

All Supervisory Positions

All Supervisors, and in particular, Supervisors working at Safety Sensitive Work Locations or overseeing personnel in Safety Sensitive Positions, shall read and be knowledgeable about this Policy and its Guidelines, specifically including the ***Supervisor A&D Handbook***, and set a positive example by complying with them.

All Harvest VPs, Managers, Superintendents, Team Leads, and Lead Operators are responsible for:

- Ensuring orientations for new or transferred Employees and Contractors include an overview of this Policy and its Guidelines.
- Ensuring that impairment and the risks of impairment are addressed as a topic in scheduled safety meetings as required.
- If so designated, ensuring the requirement for post-incident A&D Testing is completed and, where required, the necessary post-incident investigations are conducted.

7.2 Human Resources (HR)

Human Resources Advisors are responsible for:

- Ensuring the Policy and its Guidelines are distributed, posted and signed off.
- Working with the A&D Testing services provider to schedule A&D Testing.
- Ensuring new or transferred Employees who are:
 - Applying for or working in Safety Sensitive Positions, understand the pre-assignment A&D Testing requirements and Harvest's A&D Guidelines.
 - Working for Harvest, understand Harvest's A&D Guidelines.
 - Supervising treatment, monitoring and return-to-Work programs for Employees who self-disclose that they may have a substance use or substance abuse problem.
- Consulting with and providing guidance to Supervisors and Managers on what disciplinary sanctions may be appropriate for Employees.
- Being aware of Harvest's Employee and Family Assistance Program (EFAP), which is designed to help Employees experiencing personal problems such as A&D abuse. Employees are expected to seek assistance before a health condition results in impairment in the workplace or performance issues.
- Ensuring this Policy and its Guidelines are:
 - Reviewed by Harvest's Legal Department and Corporate Compliance and comply with regulations that are in force in the jurisdictions in which Harvest operates.
 - Included by reference, where applicable, in contracts with Contractors.
 - Included in all applicable audits and management of change (MOC) processes.

7.3 Health & Safety (H&S)

H&S Advisors will support Operations by validating through audits and spot checks that Safety Sensitive Positions have had proper orientations on this Policy. H&S Advisors will also support A&D Testing process and post-incident investigation.

7.4 Procurement Department

The Procurement Department is responsible for ensuring that this Policy and its Guidelines are included by reference, where applicable, in all Harvest contracts.

7.5 Contractors

Contractors are responsible for:

- Accepting and abiding by the terms of this Policy.
- Having fitness for Work policies that meet or exceed the requirements of this Policy.
- Providing a copy of their fitness for Work policies when requested by Harvest.
- Where Harvest requires pre-access Alcohol and Drug Testing as a condition of a Worker's access to a Safety Sensitive Work Location, providing Harvest with proof of satisfactory completion of pre-access Alcohol and Drug Testing before access to the worksite by the Contractor's Worker(s).
- Where a Contractor's Worker loses access to Harvest Premises due to a Positive Test Result, providing documentation confirming that the Worker has satisfied conditions as rigorous or more rigorous than the requirements described below under the heading "Consequences for Failure to Comply with the Policy" before the Worker is permitted to return to Harvest Premises.
- Where Harvest requires that a Contractor's Worker(s) undergo a pre-assignment Fit for Work assessment before working in a Safety Sensitive Position or Safety Sensitive Work Location, providing Harvest with proof of satisfactory completion of the assessment before permitting the Contractor's Worker(s) to access the worksite.

8. Employee Assistance

Employees who believe they may have a substance abuse problem are encouraged to seek help from Substance Abuse Experts ("SAEs") under Harvest's Employee and Family Assistance Program ("EFAP") and to follow appropriate treatment promptly before job performance or safety is compromised or a violation of this Policy occurs.

Due to the nature of addiction and substance dependency, sometimes it can be difficult for a person to recognize or accept that he or she has a problem. If an Employee is told by someone else – such as a family member, friend, or a medical professional – that the Employee has or may have an addiction, dependency or substance abuse problem, the Employee is responsible for following up on the issue so that they get proper treatment before it leads to performance or safety issues.

An Employee with an Alcohol or Drug problem, who is not known to have violated the A&D Guidelines, will not be disciplined for requesting help from the Company in overcoming a problem or participating in a Treatment Program.

An Employee who believes he or she may be unable to comply with the A&D Guidelines should seek help by:

- Informing a Supervisor, or a human resources representative; and

- Contacting a family physician, or a qualified SAE, or a person responsible for the administration of the EFAP.

In responding to an Employee's request for help, a Supervisor or Manager must:

- Inform the Employee of the assistance available under the EFAP and encourage the Employee to utilize the EFAP;
- Inform the Employee that if he or she fails to utilize the EFAP, Harvest may require that the Employee submit to any or all of the following:
 - i. A medical assessment conducted by a physician;
 - ii. Alcohol and Drug Testing;
 - iii. An assessment conducted by a SAE.

They are also to inform the Employee that his or her failure to do so may result in disciplinary action up to and including termination of his or her employment with Harvest.

An Employee who receives assistance from the EFAP on account of his or her use of Alcohol or Drugs must comply with the terms and conditions of any program established to help the Employee as a condition of his or her continued employment. Follow-up testing may be a condition of continued employment. All Employees who complete primary treatment for substance abuse or dependence should be strongly encouraged to participate in a structured aftercare program to maintain recovery. An Employee who is at Work and has sought assistance or enrolled in an EFAP program must comply with this Policy.

An Employee who self-discloses that they may have a substance use or substance abuse problem following a request that they have an Alcohol and Drug Test or during an investigation of a potential Policy violation or Significant Incident will not be considered as a legitimate self-referral under this Policy. Self-referral at such a time will not prevent the

Employee from being subject to discipline up to and including termination of employment for cause for violations of this Policy.

Harvest's benefits programs are only available to Employees. Contract Workers who believe they have an Alcohol or Drug problem should notify the Safety Coordinator or the Contractor's Supervisor. Contractors are responsible for ensuring their employees obtain the necessary support.

9. Suspected Policy Violations

If a Supervisor has Reasonable Grounds to believe a Worker has reported to or remained at Work while unfit, or if a Supervisor observes changes in a Worker's behaviour and/or performance that could be a sign of a substance abuse problem, the Supervisor should refer to and follow the steps outlined in the **Supervisor A&D Handbook**.

Harvest may also investigate any situation where off-the-job actions of a Worker involving Alcohol or Drugs or leading to fatigue may have direct implications for the workplace and may take appropriate action under the circumstances.

10. Consequences for Failure to Comply with the Policy

Harvest Employees

When disciplinary action is considered, the approach will be to follow a **progressive discipline** format in accordance with Harvest's Employee Discipline Procedure (which can be found on Harvest's

intranet). The degree of discipline will depend on the nature of the violation and its consequences, the existence of prior violations, the Employee's response to previous corrective action and the seriousness of the violation. However, if a single Policy violation is serious enough, it may result in termination of employment for cause.

If applicable, Harvest will consider a Medical Review Officer (MRO) report, Substance Abuse Expert (SAE) report, and/or Employee A&D Evaluation Report in determining the appropriate disciplinary action (if any).

Pending the outcome of any investigation, an Employee may be suspended with or without pay. During a period of assessment or treatment as recommended by an SAE, an Employee may be subject to modified Work and a different Work location.

Should Harvest determine that employment will continue after a violation, the Employee will be required to enter into an agreement governing their continued employment that may require any or all of the following actions, or any other condition appropriate to the situation:

- temporary removal from their position;
- assessment by a SAE to determine the need for a structured Treatment Program;
- adherence to any recommended Treatment and aftercare Program;
- remaining substance-free and having satisfactory performance on return to duty;
- successful completion of a return-to-Work test;
- ongoing unannounced testing for the duration of their agreement;
- adherence to any rehabilitation conditions or requirements; and
- no further Policy violations during the monitoring period.

Failure to meet the requirements of the agreement during the monitoring period will be grounds for discipline up to and including termination of employment.

Contractors or Contract Workers

Violations of this Policy and the accompanying Guidelines by a Contractor may be considered a breach of contract, which can result in suspension or termination of the contract.

Review

This Policy will be reviewed by Harvest senior management every 2 years, with any proposed amendments submitted for review.

Harvest reserves the right to change, update and/or cancel this Policy at its discretion.

Policy Category:

CATEGORY:	Employment
APPLICATION:	All of Harvest & Subsidiaries of Harvest
DEPARTMENT:	Human Resources
DOCUMENT OWNER:	Manager, Human Resources
EFFECTIVE DATE:	June 1, 2023
REVIEW REQUIRED:	2025

Approved by:



Byungjin Kim, President & CEO

June 1, 2023

Date

SCHEDULE "A"

DEFINITIONS

Alcohol: includes beer, wine, and distilled spirits, and the intoxicating agent found in medicines and other products.

Alcohol and Drugs (A&D): Alcohol or Drugs or both.

Alcohol and Drug Test: A test administered in accordance with this Policy.

Alcohol and Drug Guidelines: The Alcohol and Drug guidelines referred to and made part of this Policy.

Blood Alcohol Content (BAC): is the concentration of Alcohol in the blood as measured using a calibrated Alcohol testing machine.

Company or Harvest: refers to Harvest Operations Corp. and its subsidiaries and affiliates.

Company Business: refers to all business activities carried out in the course of the Company's operations, whether they take place on or off Company Premises.

Company or Harvest Premises: includes all real or personal property, facilities, land, worksites, buildings, accommodations including camps, equipment, containers, vehicles, vessels, boats, and aircraft whether owned, leased, used or controlled by the Company, wherever it may be located, for the purpose of conducting Company Business.

Confirmation Test: A test used to verify the results from an Alcohol or Drug Screening Test.

Contractor: refers to any legal entity that Harvest has contracted or verbally requested to perform a service for the Company or to act as a representative of Harvest. Such entity may be a corporation, unincorporated organization, partnership, joint venture, association, firm, trust or other entity.

Contract Worker: refers to any individual person performing services while on Company Business that is not an Employee and includes workers and agents employed by a Contractor.

Contraband: means goods that are obtained through an unlawful act, which is unlawful to possess under the law, or that is prohibited to possess under this Policy. This may include any property of Harvest or its Contractors obtained unlawfully, and includes any Illegal Drug or substance and any prohibited or restricted weapon, or explosive device.

Dog Handler: means a person in control of a dog that has been specifically trained in the detection of illicit substances such as Illegal Drugs and explosive substances.

Drug Paraphernalia: means any equipment, product or material primarily intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing, using or introducing into the human body an Illegal Drug. This includes any product or device that may be used to Tamper with or adulterate a test sample.

Drugs: means any substance whether legal to possess or not, including but not limited to Alcohol, Illegal Drugs, Recreational Drugs, Medications, or herbal preparations 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 an individual's ability to perform his or her job safely and productively including:

- (a) **Illegal Drugs**, which means any Drug or substance that is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street Drugs such as crystal methamphetamine and cocaine);
- (b) **Medications**, which means a substance used for medicinal purposes and obtained either legally (either over-the-counter or through a doctor's prescription, including Medical Marijuana), or illegally, has not been disclosed and cleared with a Company representative, or that is being misused (i.e., Percocet, Vicodin and Oxycontin); and
- (c) **Recreational Drugs**, which means any Drug or substance that is or becomes legally obtainable and whose use, sale, possession, purchase or transfer for personal use is not prohibited by law. This includes cannabis in any form (dried flower marijuana, edible, drops, etc.).

Employee: Any person on the Harvest payroll, including persons working on a regular full-time, part-time, temporary, casual or seasonal basis.

Employee and Family Assistance Program (EFAP): refers to the program available to Employees that provides confidential, professional counseling for a broad range of personal and family problems, including managing anxiety and depression, controlling substance use, resolving family conflict, and more.

Employer: A person who controls and directs the activities of an employee under an express or implied contract of employment.

Fit for Work: means, in the context of this Policy and its Guidelines, being able to safely and acceptably perform assigned duties without any limitations including those that are caused by the effects or after-effects of Alcohol, Drugs or other substances or by stress or fatigue.

Manager: Includes team leaders and other persons in authority.

Medical Marijuana: Any portion or product of the plant cannabis, including tetrahydrocannabinol (THC), cannabidiol (CBD), and other cannabinoids used for medical treatment and authorized/prescribed by a physician whether they are synthetic or not.

Medical Review Officer (MRO): A licensed physician with knowledge of substance abuse disorders and has the ability to interpret and evaluate an Employee's Alcohol and/or Drug Test result together with the Employee's medical history and any other relevant biomedical information.

Negative Test Result: means a report from the MRO that the person who provided a specimen for Alcohol and Drug Testing did not have an Alcohol and Drug concentration level equal to or in excess of that set out in this Policy.

Non-Prescription Drugs: Drugs that can be lawfully purchased without a prescription.

Owner: The person in legal possession of a site. In the context of the upstream petroleum industry, this includes an operator, licensee, leaseholder, and any other party acting as a prime contractor.

Positive Test Result: means a report from the MRO that the person who provided a specimen for Alcohol and Drug Testing did have an Alcohol or Drug concentration level equal to or in excess of the limits set out in this Policy.

Reasonable Grounds for Alcohol & Drug Testing: The referral for a test will be based on specific and personal observations resulting from, but not limited to, such indicators as:

- (d) observed inappropriate use or evidence of inappropriate use of Alcohol or Drugs (e.g. smell of Alcohol);
- (e) erratic or atypical behaviour or changes in behaviour (e.g. unexplained absences during regular Work hours);
- (f) changes in physical appearance or speech patterns;
- (g) presence of Alcohol, Drugs or Drug Paraphernalia in the vicinity of the Worker or the area where the Worker worked; and/or
- (h) any other observations that suggest the Worker may be under the influence of Alcohol or Drugs.

Reasonable Grounds Search: Harvest may Search for Alcohol and Drugs on any Company Premises where, based on a combination of indicators which could include behaviour, odor, or presence of Drug Paraphernalia, there are reasonable grounds to believe that Alcohol or Drugs are present in violation of the Policy. Such Searches may include offices, lockers, luggage and personal effects.

Safety Sensitive Position: A position in which the individual has a key and direct role in an operation where performance limitations due to substance use could result in a Significant Incident or near miss. The potential consequences of such an incident or near miss may include fatalities, serious injury to Workers or the public, significant property damage, significant environmental damage, or detrimental impact to Company reputation. No mitigating measures warrant reclassification of these positions. All Employees, including Managers and Supervisors, who may be required to perform safety sensitive duties from time to time, or to temporarily relieve in a Safety Sensitive Position, are included in this category. For the purpose of this Policy and its Guidelines, this definition includes but is not limited to all Workers in operator positions and other camp and field-based positions, as well as Workers when they are driving for Work-related purposes, whether on or off a worksite.

Safety Sensitive Work Location: is a location where there are significant hazards, such that anyone working at the location that is under the influence of Alcohol or Drugs could affect the health, safety or security of themselves, other persons, property or the environment. For the purposes of this Policy and its Guidelines, all camp and field locations have been classified as Safety Sensitive Work Locations.

Significant Incident: is any incident that results in, or may reasonably have resulted in, any of the following:

An injury that results in a:

- (a) Fatality;
- (b) Lost-time injury;
- (c) Medical treatment injury; or
- (d) Other recordable occupational injury/illness.

An injury to a member of the public or other third party not directly associated with, but injured as a result of, Harvest Business that includes a:

- (a) Fatality;
- (b) Lost-time injury;

- (c) Medical treatment injury; or
- (d) Other recordable occupational injury/illness.

Safety procedure violation with no injury, illness or damage, but likely to have resulted in:

- (a) Serious injury;
- (b) Environmental spill that is reportable under Provincial or Federal legislation;
- (c) Significant loss or damage to property, equipment, including mobile equipment, or vehicles (includes all associated Harvest, customer, public and other third party damage or loss);
- (d) Unintentional contact with energized, de-energized, pressurized, or de-pressurized sources;
- (e) Production upset or loss \geq 8 hours; or
- (f) Any other Work-related incident or a near miss considered to have had significant potential for serious consequences.

Search: means physically inspecting Company Premises and personal property as further described in this Policy for the purpose of determining compliance with the Policy and may include hand searches or the use of a Sniffer Dog and Dog Handler.

Screening Test: An initial test performed on a breath, saliva, or urine sample to determine the presence or absence of Alcohol or Drugs. All Positive Screening Tests must be verified by a Confirmation Test.

Sniffer Dog: are dogs which have been specially trained, for the detection of Illegal Drugs, substances and explosive devices otherwise referred to as Contraband.

Substance Abuse Expert (SAE): A licensed physician; a licensed or certified social worker; a licensed or certified psychologist; a licensed or certified employee assistance expert; or an Alcohol and Drug abuse counselor. He or she has received training specific to the SAE roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse related disorders, and has an understanding of the safety implications of substance use and abuse.

Supervisor: A person who directs the Work of others and is accountable for a particular area or shift, and may, depending on the nature of the Company's structure, include the foreman, general foreman, supervisor, superintendent or a team leader.

Tamper: To alter, meddle, interfere or change.

Treatment Program: A program tailored to the needs of an individual which may include education, counseling, and residential care offered to assist a person in complying with the Alcohol and Drug Work Rule.

Work: Includes training and any other breaks from work while on Company Premises.

Worker: includes both Employees and Contract Workers.