


# ALCOHOL & DRUG PROCEDURE

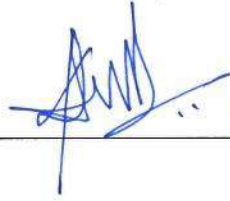
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The person in charge of the activity is responsible for applying this procedure.


**LIST OF VERSIONS**

Version No.	Date	Section	Page(s)	Purpose of the Modification
1	August 14, 2012			New document
2	May 18, 2016	Appendix A	16	<i>Safety officer is removed for tests during the night shifts</i>
3	February 27, 2018	Signatures		<i>Some of previous signatories no longer employed</i>

**DEFINITIONS APPLICABLE TO THIS DOCUMENT**

Alcohol	Ethyl alcohol, or ethanol, is an intoxicating ingredient found in beer, wine, and liquor. Alcohol is produced by the fermentation of yeast, sugars, and starches. Alcohol in this sense refers to any commercial or home-made fermentation combination.
Alcohol legal limit	The Surinam traffic law have adopted 0.05% alcohol in blood (blood alcohol content) as per legal code to drive a vehicle.
Alcohol test	Test administered to detect alcohol in breath with an breath analyzer
Drug test	Test administered to detect drug in urine.
Company workplace	Includes all real or personal property, facilities, land, buildings, equipment, containers, vehicles, vessels, boats and aircraft whether owned, leased or used by the company wherever it may be located
Drug paraphernalia	The possession of any personal property which is associated with the use of any drug, substance, chemical or agent
Drugs	Includes any drug, substance, chemical or agent which is unlawful or requires a personal prescription from a licensed treating physician, any non-prescription medication lawfully sold and drug paraphernalia
Employee	Any person on the company's payroll including expatriates under IMG payroll and assigned to The Company.
Contractor	Anyone who is not employed by the company, but working on the company workplace or doing business with the company.
Employee Assistance Program	Services that are designed to help employees who are experiencing personal problems

Medical review officer	A licensed physician or registered nurse with knowledge of substance abuse disorders and the ability to evaluate an employee's test results, who is responsible for receiving and reviewing drugs test results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results
Negative test result	A report from the medical review officer that the employee who provided a specimen for alcohol and drugs testing and was tested negative. Negative is defined as being below the Surinamese Law or accepted international standard level.
Positive test result	A report from the medical review officer that the employee who provided a specimen for alcohol and drugs testing and was tested positive. Positive is defined as being above the legal limit, as described in the Surinamese Traffic Code (for alcohol) or accepted international standard level (drugs)
Reasonable grounds	Includes information established by the direct observation of the employee's conduct or other indicators, such as the physical appearance of the employee, the smell associated with the use of alcohol or drugs on the employee or in the vicinity of the employee, circumstances surrounding an accident, near miss or potentially dangerous incident and the presence of alcohol, drugs or drug paraphernalia in the vicinity of the employee or the area where the employee works or stays (accommodation). This situation calls for the testing of employees who exhibit reasonable evidence of some kind of drug or alcohol abuse.
Random testing	The Company will design a process that initiates random but compulsory testing. Random is based on probability and will not target individuals but a percentage of individuals within a sample.
Rehabilitation program	Is a program tailored to the needs of an employee which may include education, counselling and residential care offered to assist a person to comply with the alcohol and drug work procedure
Supervisor	The person who directs the work of others and may, depending on the nature of the company's structure, include the foreman, general foreman, supervisor, superintendent and/or team leader. Supervisors will receive training regarding the Drug and Alcohol Procedure and the use of the Employee Assistance Program.
Work	Includes time spent in the Company workplace under normal schedule as well as training and any other breaks from work while at the company workplace
Illicit drugs	Chemical substance used for its effects on bodily processes. The use of these drugs is prohibited by law.

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RGWO	Rosebell Goldmines Employees Organization
Work plan	Plan put together to assist the employee in being able to manage their fit return to work.
Vendor/supplier	A company which supplies parts or services to another company also called a supplier

**PURPOSE**

This Alcohol and Drugs procedure is a fundamental part of the Company's strategy to safeguard the health, safety and welfare of all its employees.

Alcohol and drug consumption (affects the individual health and the ability of a person to work in a safe and efficient manner thereby jeopardising the safety of his/her colleagues.

Employees from the company and its affiliate contractors and their employees are often working with equipment or material which if not managed with proper care and attention poses a threat to the safety of themselves, the workforce and the company workplace.. This Alcohol and Drugs Procedure will remind all employees of the risks associated with the use of alcohol and drugs and will provide understandable and predictable responses when an employee's conduct jeopardizes the safety in the workplace.

By pursuing the purpose of this Procedure, the Company promotes:

- safety and dignity of its employees,
- welfare of its employees and their families,
- best interests of the company or contractor to which employees belong, and
- best interests of the company, and the public
- a working environment free from the effects of alcohol and drugs
- to provide practical guidance on how to deal with alcohol or drug-related problems effectively

The objective of this procedure is to develop a drug and alcohol-free workplace which will help ensure a safe and productive workplace and to provide education and treatment to our employees.

This alcohol and drugs procedure is established to:

- provide a safe workplace for all employees and those whose safety may be affected by the conduct of all employees,
- ensure that all employees are treated fairly and with respect

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- enhance employees' health, well-being and safety.
- raise awareness of the risks of alcohol and drug related problems;
- minimise problems at work arising from the effects of alcohol and drugs
- offer employees with alcohol and drugs related problems referral to an appropriate source for intervention and treatment if necessary.

## SCOPE

This policy and procedure affects all employees of Rosebel Gold Mines N.V. and every vendor, consultant, visitor and contractor who enters onto the Company workplace.

## DESCRIPTION OF THE ACTION

The successful implementation of this procedure is the shared responsibility of the company, employees, and contractors.-

### 1.1 Employee, Contractor and Visitor Responsibilities

- To have an understanding of the alcohol and drug work procedure
- To take responsibility to ensure their own safety and the safety of others and care and risk management of Company property
- To ensure they meet the work standards as part of their obligation to perform work activities in a safe manner
- To cooperate with the work procedure and follow appropriate treatment if deemed necessary
- To use medications responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects where applicable
- To encourage their peers or co-workers to seek help when there is a breach of procedure.

### 1.2 Company and Contractor Supervisor Responsibilities

Supervisors must:

- be knowledgeable about the company's alcohol and drug work procedure.

- ensure they implement and meet the Work Standards (See article 2.2. of the Alcohol and Drug Procedure) as part of their responsibility to perform their work-related activities in an effective and safe manner
- be knowledgeable about the use of alcohol and drugs and be able to recognize the symptoms of the use of alcohol and drugs
- understand their company's performance management procedure and how this alcohol and drugs procedure is integral to that procedure
- take action on performance deviations
- take action on reported or suspected alcohol or drug use by employees.
- support the company in achieving ZERO HARM

### 1.3 The Company and Contractors Responsibilities

The company must:

- provide a safe Company workplace;
- provide education programs that emphasize awareness accountability and responsibility respect to the use of alcohol and drugs;
- ensure the guidelines and work procedure support other performance management systems;
- ensure effective employee assistance services are available to employees;
- provide training and awareness for supervisors in dealing with the use and recognizing of alcohol and drugs in the Company workplace;
- ensure that all employees understand the existence of and content of the guidelines and work procedure as part of the employee's orientation to that company;
- ensure that the alcohol and drug testing is performed according to the standards set out in this document;
- Ensure that confidentiality is maintained as far as practical and relevant.

## 2 GUIDING PRINCIPLES

### 2.1 Providing a Safe Workplace

It is recognized that the use of illicit drugs, the inappropriate use of alcohol and (non-) prescription drugs can have serious adverse effects on a person's health, safety and job performance. The alcohol and drug procedure will help to enhance the level of health and safety at the company workplace.

In developing this procedure, the following principles were considered:

- The application of an international standard alcohol and drug management procedures

- The recognition that every person has the right to a safe and reliable workplace.
- The commitment to ensure no employee creates a risk for themselves, others and/or operating plant equipment through the use of alcohol and drugs.
- The acceptance that both individuals and the company have a legal and moral responsibility to ensure their own safety and the safety of others.
- That the procedure must be legally defensible and furthermore ensure and maintain confidentiality and integrity of the testing process.

## 2.2 Work Standards

- Alcoholic beverages may only be used /obtained in the accommodation areas.
- Moderate consumption of alcohol is permitted, not during working hours, in and around the commissary and accommodation areas, and at specific functions sanctioned by the company.
- If an employee is taking a prescription or non-prescription drug for which there is a potential unsafe side effect, he or she has an obligation to report it to the supervisor.
- No employee will bring onto Company workplace alcohol.
- All employees will follow Company rules, policies and procedures with respect to Alcohol and Drug. All employees will be treated fairly and with respect.
- Employees experiencing personal problems which may influence their behaviour or performance have access to confidential counselling services

## 3 ALCOHOL & DRUGS WORK PROCEDURE

### 3.1 An Employee Shall Not (Employee's Restrictions):

- use, possess or offer for sale alcohol (exception under 2.2) and drugs while at a company workplace,
- report to work or work,
  - (1) under influence of alcohol;
  - (2) under influence of drugs, or
  - (3) while unfit for work on account of the use of a prescription or non-prescription drug,
- refuse to,
  - (a) comply with a request made by a representative of the company under 4 , or
  - (b) comply with a request to submit to an alcohol and drug test made under 4, or
  - (c) provide a sample for an alcohol and drug test under 4;

- tamper with a sample for an alcohol and drug test given under 4;
- distribute or share prescription/non- prescription drugs to other employees unless the distributor is a licensed physician or medical review officer recognised by the Company and is performing Company sanctioned duties.

### **3.2 An Employee shall comply With (Employee's Compliances)**

To comply with the Alcohol and Drug Procedure an employee who is in possession of a prescription drug prescribed for him or her or a non-prescription drug shall:

- Ensure that the prescription or non-prescription drug is used for its intended purpose and in the manner directed by the employee's physician or pharmacist or the manufacturer of the drug;
- Ensure that 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 prescription or non-prescription drug.
- Ensure that if they are aware of any person who contravenes any part of this procedure or work rule that they manage the safety of the operation by reporting that person to their supervisor.

### **3.3 Notification**

The supervisor or manager who has received a notification under 7.2 (d) may not disclose any information provided under 7.2 to any person other than a person who needs to know, to discharge a statutory or civil law of Suriname.

## **4 IMPLEMENTATION OF THE ALCOHOL & DRUGS WORK PROCEDURE**

### **4.1 Information**

The company is committed to inform employees of the existence of this alcohol and drug procedure and to take such other steps as are reasonable to inform its employees of the safety risks associated with the use of alcohol and drugs and the assistance available under the employee assistance services program.



## 4.2 Self Help

4.2.1 This procedure encourages employees who believe that they may require the help provided by Substance Abuse Professionals (SAPs) and Employee Assistance Services Programs (EAPs) to voluntarily request that help. An employee requesting help will not be disciplined unless he or she:

- (a) has failed to comply with the Alcohol and Drug Work Procedure, or
- (b) has been requested to confirm compliance with the Alcohol and Drug Work Procedure under 4.3, or
- (c) has been requested to submit to an alcohol and drug test under 4.4, 4.6 or 4.7, or
- (d) has been involved in an incident referred to in 4.5, or
- (e) has failed to follow an agreed work plan, or
- (f) has failed to meet their workplace and current applicable Code of Conduct obligations.

4.2.2 An employee who believes that he or she may be unable to comply with the alcohol and drug work procedure should seek help by:

Inform his or her supervisor. In responding to an employee's request for help a supervisor or manager must:

- (a) inform the employee of the assistance available under the employee assistance program,
- (b) encourage the employee to utilize the employee assistance program which may assist the employee, and
- (c) inform the employee that if he fails to follow the drug procedure the company may insist that the employee submit to any or all of the following:
  - (i) a medical assessment conducted by a physician,
  - (ii) alcohol and drug testing as set out in 4.8,
  - (iii) an assessment conducted by a substance abuse professional, and that
- (d) his failure to do so may result in the termination of his employment.

4.2.3 An employee who receives assistance from the employee assistance program on account of his use of alcohol and drugs must comply with the terms and conditions of any program established to help the employee as a condition of his continued employment.

### 4.3 Awareness of the possession of alcohol and drugs

Any employee who has reasonable grounds to believe a fellow employee may not be in compliance with 3.1(a) of the alcohol and drug work procedure, must seek the assistance of supervisor or manager.

### 4.4 Observation of employee conduct

4.4.1 A supervisor or a manager of an employee may request an employee to submit to an alcohol and drug test under 4.8 if the supervisor or manager has grounds to believe that an employee is or may be unable to work in a safe manner because of the use of alcohol and drugs.

4.4.2 A supervisor or manager of an employee must provide to the employee the reason for the request under 4.4.1.

### 4.5 Accidents, near misses and dangerous incidents

4.5.1 A supervisor or manager of an employee must request an employee to submit to an alcohol and drug test under 4.8 if the supervisor or manager, have grounds to believe that an employee was involved in an accident, near miss and dangerous incidents.

4.5.2 A supervisor or manager of an employee must provide to the employee the reason for the request under 4.5.1.

4.5.3 A supervisor or manager must make a request under 8.5.1 immediately following an accident, near miss and dangerous incidents, unless it is not practicable or reasonable to do so until a later time.

### 4.6 Random testing

4.6.1 The Company will implement a random alcohol and drug testing program. All employees, contractors or visitors will be subject to the random testing program. The random testing program will be based on probability within a sample population and will be managed through a written procedure for consistency.

4.6.2 All employees, contractors or visitors selected for a random test are obligated to undertake the test.

#### 4.7 Site access testing

The Company retains the right to insist upon access testing. Any person who refuses to test or tests positive will not be able to access the site. Employees will be consequently managed as per Sect 5.

#### 4.8 Alcohol and drug testing

##### 4.8.1 Rules:

- Anyone involved in an accident, near miss and dangerous incidents will be routinely tested as part of the investigative process.
- Testing of an individual may occur anywhere on the Company work place during the employee's work schedule
- An employee who is driving a Company vehicle may be subject to testing.
- In case of "reasonable grounds" an employee's or contractors possessions or room may be searched at any time.

##### 4.8.2 Protocols:

- Quality test kits will be employed.
- Equipment, where relevant, will be appropriately calibrated and maintained , by the department in accordance with factory requirements.(Department Warranty and metrology of the Ministry of Trade and Industry)
- Testing staff will be trained and competent.
- Safeguards will be in place to prevent falsification of test results.
- Safeguards will be in place to secure confidentiality
- The sample will be collected and tested in accordance with the kit manufacturer's directives.
- Supporting tests will be used to ensure accuracy
- An employee will not suffer due to a false positive result

#### Alcohol test

A breath with an alcohol concentration of equal to or larger then 0,05 % BAC (Blood Alcohol Content) is considered positive. However any result providing a reading between 0.00 and 0.05 % BAC will result in the employee or contractor being stood down from operating any

equipment. This will not be considered a disciplinary issue but the employee will not be paid for time stood down.

**Drug test.**

The following readings are recognised internationally as being excessive for industrial work and will be considered positive and as a result subject to disciplinary action according to Section I of the Code of Conduct:

Drug	Nanograms per Milliliter
Marijuana	50
Cocaine	150

Although the following drugs are not mentioned in de Code of Conduct, if being tested positive (see readings below) you will be subject to disciplinary action according to Section I of the Code of Conduct.

Drug	Nanograms per Milliliter
Opiate	2000
Phencyclidine	25
Amphetamin	500

**5 Consequences for Failure to Comply with the Alcohol & Drug Work Procedure**

**Company responses to violations**

Any violation of the Procedure is a disciplinary offence for an employee and whilst consequence depends on the facts of the case, including the nature of violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation, the consistency in application will be managed in accordance with Company’s Code of Conduct.


The Company may require an employee to undertake a work plan developed with the Employee Assistance Program and a return to work may be conditional on the plan being instigated and followed. Failure to follow a work plan will be treated as a further non-compliance of the procedure and will instigate further disciplinary action.

The Company may refuse site access to a contractor or visitor who fails to comply with the alcohol and drug procedure.

## 6 DOCUMENT CONTROL

Document	Primary File Location	Frequency of Review/Update

If you have any comments, questions or requests for corrections regarding this document, please contact one of the signatories.

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**DOCUMENT RECEIPT**

I have received a copy of the document named: "Alcohol & Drug Procedure", established by Rosebel Gold Mines N.V.

In addition, I can say that I have received instruction about the topics contained in this document.

Also, I confirm that I will respect and abide by the rules and obligations established in this document and associated procedures.

Name	
Badge #	
Company	
Position/Title	
Date	
Signature	

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## Appendix A - Procedures

### Alcohol Testing

For alcohol testing the CA2000 Digital Alcohol testing device is used. It is necessary to run a check on the instrument prior to actual testing of any employee and contractor in order to ensure a zero reading. Each employee and contractor being tested must blow into the mouth piece of the testing device after taking a deep lung breath. The mouth piece must be changed for each employee who is tested.

### Drug testing.

For qualitative testing two "rapid tests" are used:

1. Drugs of Abuse multi-line 5 panel drugtest (instant view test)
2. Humadrag Cocaine & Cannabinoids (THC) drug test

The medical review officer as the collector performs essential steps in conducting a urine specimen collection for drug testing.

### Security and confidentiality

- Restrict access to only authorized personnel
- Restrict access to collection materials/ supplies
- The medical review officer should ensure that the employee does not have access to items that could be used to adulterate or dilute the urine specimen (e.g. soap, disinfectants, personal hygiene products, water)
- Prohibit unobserved entrance/ exit from the site
- Provide for secure handling/ storage of specimens for collection until eventual transportation to Paramaribo
- Bluing or other coloring agent to add to the toilet bowl or tank to discourage adulteration/ dilution of the urine specimen


### The collection and testing of drugs:

After approval of the employee (by signing the drug test form) the medical review officer starts with collecting urine and drug testing.

- a) The medical review officer instructs the employee to wash and dry his/her hands, preferably under the medical review officer's supervision. The employee should not be allowed any further access to water or other materials that could be used to adulterate/dilute the urine specimen.

- b) The medical review officer then gives the employee a collection container (specimen bottle) for the employee to provide the samples for screening. Note: present during the collection are: the medical review officer, ~~a safety officer~~ and a security officer. *During day shifts representatives from the Occupational Health & Safety department and HR department can assist where needed.*
- c) The employee takes the collection container (specimen bottle) into the restroom to provide the specimen while being accompanied by a security officer with permission from the employee. The employee may not flush the toilet or use any source of water that could not be secured.
- d) The employee gives the container to the medical review officer immediately upon leaving the restroom. Note: the medical review officer marks the containers as A & B in the presence of the employee. The A-container is used for direct testing on site. The B-container is the reserve container which will be transported to Paramaribo in the case of a positive result. Both containers are labelled. On the label you have the employee's name and date of birth as the date on which the sample is taken.
- e) The medical review officer pours 30 ml of the urine into the "A" bottle and places the cap on the bottle. The medical review officer then pours the remaining urine (at least 20 ml) into the "B" bottle and places the cap on the bottle.
- f) The medical review officer then perform the multi-line 5-panel test on sample A. If this test is positive on one of the tested items a second test, 1-panel drug test will be done (specific for the positive tested item).
- g) If the second test is also positive sample B is sealed with security tape by the security officer in the presence of the employee, Union Representative and medical review officer. This sample is put in an icebox with ice packets in it (temperature 2 to 8 degrees Celsius; ice packets on the bottom of the icebox with foam on the ice packets and then the sample is placed on the foam.) which will also be sealed by the security officer with all mentioned above present. Note: there shouldn't be direct contact between the ice packets and the urine.
- h) Sample B is transported to the Academic Hospital in Paramaribo accompanied by the security. The employee leaves site pending further investigation.



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- i) A report from the medical review officer to the designated company representative that the employee's sample produced a negative test result means that the employee complied with 7.1(b) of the alcohol and drug work procedure. The designated company representative must notify the employee of the negative test result and that no other steps under this alcohol and drug procedure will be taken. It may be appropriate to pursue procedures under other policies or take other steps, including a medical assessment, in order to assist the employee to perform at a satisfactory level.
  
- j) A confidential written report from the medical review officer to the designated company representative that the employee's sample produced a positive test result means that the employee failed to comply with 7.1(b) of the alcohol and drug work procedure. If the test result for drugs is positive after the second opinion termination of employment will occur according to the Code of Conduct Section 1 Article 5.
  
- k) In order to preserve the confidentiality of test results, the designated company representative and any person to whom disclosure is permitted under this alcohol and drug procedure must not disclose the test results to any person other than a person who needs to know the test results to discharge an obligation under this alcohol and drug procedure