



Employee Substance Abuse Program

ConocoPhillips Canada
August 2018

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A. Introduction

ConocoPhillips Canada (the “Company”) strives to create and maintain an operating environment free of any negative impacts associated with substance abuse. Everywhere the Company does business, we seek to preserve a safe, healthy and productive work environment for employees. We believe that substance abuse increases the potential for accidents, absenteeism, substandard performance, and poor employee morale and health, as well as damage to the Company’s reputation. ConocoPhillips Canada has developed and implemented this program in furtherance of the ConocoPhillips Global Substance Abuse Policy - see Appendix C.

B. Interpretation

Every effort has been made to develop an easy to understand program for general application. However, no program can anticipate every situation. If you have questions concerning the application of this program or require an explanation of any of its terms, please contact your supervisor or your Human Resources Business Partner (HRBP). The Company is the sole interpreter of this program and reserves the right to change, modify or discontinue this program at any time.

C. Program Statement

While on duty or on call for duty, on a Company worksite, or while operating or while a passenger in a Company vehicle*, ConocoPhillips Canada employees are prohibited from:

1. Using, possessing or distributing any illegal drug;
2. Being impaired by any illegal drug or a having a positive drug test result;
3. Being impaired by alcohol or having an alcohol level equal to or more than 0.02 grams per 210 liters of breath;
4. Being impaired by marijuana or having a marijuana (THC) level equal to or more than 50 nanograms/ml of urine;
5. Consuming, possessing or distributing alcohol in sealed or unsealed containers except where such consumption, possession or distribution has been authorized in accordance with this program;
6. Consuming, possessing or distributing marijuana in any form except where such consumption, possession or distribution has been authorized in accordance with this program;
7. Using, possessing or distributing any other intoxicant or hallucinogen, or other substances that may alter an individual’s mood, perception, coordination, response, performance or judgment;
8. Using, possessing or distributing any illegal drug paraphernalia or any product or device that could be used to defeat a drug or alcohol test or tamper with any sample for an alcohol or drug test;
9. Using, possessing or distributing any prescribed or authorized drug, except in accordance with a prescription/authorization issued by an authorized medical practitioner;

10. Using or possessing over the counter medicines except in accordance with the manufacturers' or a medical practitioner's dosage recommendations and usage cautions;

These ten prohibitions are individually referred to in this program as a "Prohibition" and collectively as the "Prohibitions".

** Company vehicle includes any vehicle supplied by the Company (whether or not owned by the Company) and any vehicle used by an employee in conjunction with work for the Company and may include the employee's own vehicle.*

In this program, the term "illegal drug" means any substance or chemical the possession of which is prohibited under the Controlled Drugs and Substances Act, Canada. A drug will not be considered an illegal drug in circumstances authorized in accordance with that Act. Illegal drugs include but are not limited to: cocaine, opioids, amphetamines and phencyclidine.

Prescription / Over the Counter Drugs

Employees must ensure that their use of prescription drugs and over the counter medications will not unduly impact their ability to work safely and effectively. Employees who are aware that their ability to work safely and effectively, may be adversely impacted by a prescription or over the counter drugs must advise their Supervisor, HRBP, or the Occupational Health Nurse (780-334-5970). Employees are responsible for obtaining the information necessary to determine whether the use of any such medication may negatively affect their ability to perform their jobs safely and effectively. Accordingly, employees must discuss their job responsibilities with their personal physicians to determine whether use of any prescription and/or over the counter medication could adversely affect their ability to perform their jobs safely and effectively. Further follow-up with their physician may be required and alternate medications may be advised by CPC's medical professionals.

Company Sponsored Events

Employees of ConocoPhillips Canada are subject to all of the Prohibitions while attending or participating in Company-sponsored events. However, a member of the Senior Leadership Team (SLT) may modify the Prohibitions concerning alcohol for the duration an event. Employees are expected to act responsibly at all Company sponsored events and limit their consumption of alcohol accordingly. Company sponsored events include all events that have been sanctioned, sponsored or paid for by the Company, regardless of whether the event takes place during regular working hours, or not. Under no circumstances will the use of illegal drugs or marijuana be permitted or condoned at Company sponsored events. No one should ever drive a motor vehicle to or from a Company sponsored event while impaired by alcohol or having a blood alcohol level above the legal limit.

Supervisor Responsibilities

It is the responsibility of every supervisor to ensure that this program is followed and enforced within their areas of responsibility. Supervisors must ensure that the employees they supervise are aware of, understand and follow this program.

No supervisor having actual knowledge that any worker is consuming alcohol, marijuana, a drug or any other intoxicant, hallucinogen or other substances that may alter an individual's mood, perception, coordination, response, performance or judgment, while performing a Safety Sensitive Position (Safety Sensitive Positions are described in Appendix B), shall permit that worker to continue to perform his or her duties.

A supervisor who has reasonable grounds for believing that a worker is impaired by alcohol, marijuana, a drug or other substance must remove that worker from duty immediately. Refer to Appendix A.

No supervisor shall permit an employee who refuses to undergo drug and alcohol testing when required to do so in accordance with this program to perform or continue to perform in a Safety Sensitive Position.

A supervisor who has reason to believe that an employee may have a substance abuse problem, must consult with their HRBP.

In discharging responsibilities under this program, supervisors must take all reasonable steps to ensure that information concerning an individual worker is maintained in confidence.

Enforcement

ConocoPhillips Canada will conduct drug and alcohol testing in accordance with Appendix A.

Employees who do not comply with the Prohibitions or any other aspect of this program, without reasonable excuse, will face disciplinary action which may include termination for cause. No employee may refuse a request for a drug and alcohol test made in accordance with this program. Any employee who refuses to submit to a required test or who switches, tampers with or attempts to tamper with a test sample or obstructs the testing process will be relieved of his or her duties, may be potentially referred to a substance abuse expert for assessment and will face disciplinary action.

Employees who return to work after completing rehabilitation and test positive during a follow-up test, will be terminated for cause.

D. Support for ConocoPhillips Canada Employees

ConocoPhillips Canada will support all of its employees in their efforts to comply with the above Prohibitions and this program by:

- 1) Providing mandatory training to all employees on the consequences of program violation, resources available for employee assistance services and testing procedures;
- 2) Providing confidential employee assistance and counseling services through the Company provided Employee and Family Assistance Program (“EFAP”);
- 3) Assisting employees seeking to overcome substance abuse problems with locating substance abuse experts and treatment programs;
- 4) Providing accommodative work schedules and job structures for employees seeking to overcome substance abuse problems;
- 5) Ensuring that employee information is treated confidentially; and
- 6) Making the policy and this program document available to all employees

Voluntary Disclosure

Any employee who wishes to disclose a substance abuse problem may advise his or her supervisor or HRBP.

An employee who voluntarily discloses before having been involved in an incident or having been requested to submit to an alcohol or drug test will be subject to discipline only if (a) the substance abuse expert concludes that the employee is not suffering from a dependency; or (b) the employee does not follow the recommendations of the substance abuse expert or fails to complete a prescribed treatment program, having been given a reasonable opportunity to do so.

Prospective Employees

As part of the pre-employment screening and as a pre-condition to employment, ConocoPhillips Canada will require all prospective employees to be engaged in a Safety Sensitive Position, to undergo a drug test. Any prospective employee whose offer of employment is withdrawn due to failure to successfully pass a drug test will be permitted to re-apply for employment with ConocoPhillips Canada.

Appendix A - Testing Circumstances and Types

ConocoPhillips Canada will conduct drug and alcohol testing only in the following circumstances:

1. Pre-Employment

ConocoPhillips Canada will require that anyone offered employment in a Safety Sensitive Position will be tested for the presence of the following drugs: marijuana (THC), amphetamines, cocaine, opioids, and phencyclidine.

2. Pre-Site Access

A manager or supervisor, with the concurrence of the Senior Leadership Team may implement a protocol whereby all employees and employees of contractors working in Safety Sensitive Positions at a particular work site are required to undergo drug and alcohol testing of employees and contractors prior to being granted access to any field work site. The protocol may include a requirement for periodic maintenance testing (as per individual site requirements). Where a contractor provides satisfactory evidence that a worker has tested negative for drugs and alcohol within the previous 12 months, ConocoPhillips Canada will not require that worker to undergo site-access testing.

3. Post-Incident

If, following a preliminary investigation, an employee's manager or supervisor, (or any other, more senior manager) has a reasonable belief that substance use may have been a contributing factor to any incident, the supervisor or manager, with the documented concurrence of a General Manager, HSE may require that any employee involved in a significant incident or near miss, such as a fatality, disabling injury or a high potential near miss undergo a drug and alcohol test as soon as possible.

4. Reasonable Grounds

If a supervisor believes an employee is in a condition unfit for normal work, the supervisor may take any of the following actions:

- escort the employee to a safe/private place, interview, and give the employee an opportunity to explain why they appear to be in a condition unfit for work;
- refer the employee for medical attention if there are obvious immediate medical concerns (health centre, local hospital or clinic); or
- refer the employee for an alcohol and drug test if there are reasonable grounds to believe alcohol or drug use may be a factor in the situation after appropriate consultation with HRBP and HSE.

5. Random alcohol and drug testing

25% of Safety Sensitive employees will be subject to random drug and alcohol testing on a yearly basis.

6. Return to Duty and Follow-up Testing

An employee who is returning to work following a suspension or leave from duty as a result of having tested positive for drugs or alcohol or having been referred to a substance abuse expert and with the recommendation of the substance abuse expert, must successfully pass a drug and alcohol test, before being returned to active duty. Thereafter the employee may be subject to follow up testing at the frequency and for the duration determined by the Director HR Services, having regard to the recommendation of a substance abuse expert.

Other Testing Considerations

ConocoPhillips will allow employees to discuss test results and the circumstances thereof with the Medical Review Officer, and to have split-samples re-tested by the laboratory engaged by ConocoPhillips Canada or by a certified laboratory of their choosing.

Failure to report for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to the Company Representative, an attempt to tamper with a test sample, inability to provide sufficient quantities of the test sample or refusal to be tested without a valid explanation acceptable to ConocoPhillips, will be considered a positive test result.

Appendix B - SAFETY SENSITIVE POSITIONS

A position will be considered to be a Safety Sensitive Position when the position involves:

- a) driving a vehicle, on 10% or more of the employee's ordinarily scheduled work days;
- b) operating mechanical equipment;
- c) oil and gas field operations or construction, including the direct supervision thereof (including, supervision exclusively from the office);
- d) being on call or on duty for an emergency response position, more than "occasionally";

or if the position has been permanently or temporarily declared to be a Safety Sensitive Position by a member of the Senior Leadership Team.

Appendix C - Global Substance Abuse Policy

GLOBAL SUBSTANCE ABUSE POLICY

At ConocoPhillips, our objective is to create and maintain an operating environment free of substance abuse. We believe that substance abuse increases the potential for accidents, absenteeism, substandard performance, and poor employee morale and health, as well as damage to the company's reputation. The company has zero tolerance for violations of this Policy and the employment of even first time offenders will be terminated in accordance with relevant law.

To enforce this Policy, ConocoPhillips will:

- Implement a substance abuse testing program that subjects employees to random drug and alcohol screening.
- Require pre-employment drug testing of job applicants, and drug and alcohol testing of employees for reasonable suspicion/cause, post-accident situations, rehabilitation follow-up, and to verify return-to-duty eligibility post-rehabilitation.
- Ensure that all employees are aware that this Policy covers improper use of prescription medications, as well as abuse of alcohol, illegal drugs and other substances that may alter an individual's mood, perception, coordination, response, performance or judgment.
- Provide relevant training to raise employee awareness of substance abuse issues and the consequences for violation of this Policy.
- Provide employees who voluntarily disclose their substance abuse problems with opportunities for rehabilitation, where adequate facilities are available and it is feasible to do so.
- Offer internal or external resources, where available, to answer employees' questions regarding the potential work-related impact of over-the-counter or prescription medications.
- Communicate our commitment to this Policy to our employees, contractors, and visitors and engage their support for creating and maintaining an environment that is free of substance abuse.

In those circumstances where government regulations, laws, or local practices impact the implementation of this Policy, business unit leadership will develop and implement a country specific Substance Abuse Policy that conforms to local requirements, after which the local policy will be included as an addendum to this Policy. Applicants and employees will adhere to the Substance Abuse Policy addendum relevant to their country.

We believe that the successful implementation of this Global Substance Abuse Policy will help ensure a continued safe, healthy and productive work environment.



Ryan Lance
Chief Executive Officer

Canada Addendum to the ConocoPhillips Global Substance Abuse Policy

ConocoPhillips Canada will comply with all aspects of the ConocoPhillips Global Substance Abuse Policy except for the provisions below, due to Canadian legal restrictions.

- Random alcohol and drug testing will be limited to safety sensitive employees only
- Pre-employment drug testing of applicants will be limited to applicants of safety sensitive positions only
- ConocoPhillips Canada will automatically terminate the employment of first time offenders where that termination is consistent with Canadian case law and regulatory decisions. Employees who are not terminated will be subject to other disciplinary action as is appropriate in the circumstances or required to complete a program of rehabilitation.