

Employee Substance Abuse Policy

ConocoPhillips Canada
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1. Purpose

ConocoPhillips its affiliates, subsidiaries and related entities strive to create and maintain an operating environment free of any negative impacts associated with substance abuse. ConocoPhillips Canada Resources Corp. (the “**Company**”) seeks to preserve a safe, healthy and productive work environment for its Employees, business partners, and the general public in the communities where the Company conducts its business. Substance abuse increases the potential for incidents, absenteeism, substandard performance, and poor employee morale and health, as well as danger and damage to personal safety, property, the environment, and the Company’s reputation. Accordingly, the Company has developed and implemented this substance abuse policy (the “**Policy**”) in furtherance of ConocoPhillips Global Substance Abuse Policy (see Appendix C).

2. Application

This Policy applies to all Employees of the Company. However, only those Employees that occupy Safety Sensitive Positions are subject to pre-employment, pre-site access and unannounced random Drug and/or Alcohol testing, as set out below.

In specific circumstances noted below, certain provisions of this Policy may be applied through third party contract terms to the Company’s contractors and their employees (including contingent workers on assignments working for the Company). The application of certain provisions of this Policy in such circumstances does not alter the status or characterization of a contractor, contractor’s employee or contingent worker as not being an Employee of the Company.

3. Interpretation

Every effort has been made to develop an easy-to-understand policy for general application. However, no policy can anticipate every situation. Questions concerning this Policy or any of its terms should be directed to a supervisor, manager, or a Human Resources Business Partner (“**HRBP**”). The Company is the sole interpreter of this Policy and reserves the right to change or discontinue this Policy at any time.

4. Definitions

In this Policy, the following terms have the following meanings. The singular will be construed as including the plural and vice versa, as the context requires, and a derivative of that defined term shall have the corresponding meaning.

“Accredited Laboratory” means a laboratory that meets the guidelines and standards of the Substance Abuse and Mental Health Services Administration’s National Laboratory Certification Program for forensic urine and oral Drug testing laboratories.

“Alcohol” means any substance that may be consumed and that has an alcoholic content in excess of 0.5% by volume.

“Cannabis” means cannabis, as defined in the *Cannabis Act*, SC 2018, c. 16.

“Company Workplace” includes, but is not restricted to, all premises, facilities, buildings, Company-provided accommodations, Equipment, and worksites used for the purpose of conducting Company business or where Company sponsored activities or social events are conducted.

“Drug” means any substance, chemical or agent which changes and/or adversely affects the way a person thinks, feels or acts, or has the potential to do so, including but not limited to those substances, chemicals or agents that are controlled or unlawful and are not obtainable by lawful methods, or which are legally obtainable but were not obtained in a lawful manner, Cannabis, or any Medication, whether or not it is being used as prescribed in the appropriate manner or by the person for whom it is prescribed.

“Drug and/or Alcohol Test” means a test administered in accordance with Section 5.6 and Appendix A.

“Drug Paraphernalia” means any personal property which is associated with the use of a Drug and includes any device that may be used to attempt to tamper with a test sample.

“Employee” means all full time, part time, temporary, casual, fixed-term and seasonal employees of the Company.

“Equipment” means machinery, vehicles and equipment which are owned, leased or otherwise controlled by the Company or used by an Employee for the purpose of conducting Company business (including the Employee’s own personal vehicle).

“Fit for Duty” means being capable of performing all work-related duties in a safe, efficient and productive manner and not being impaired by any Drug or Alcohol that may impede the safe operation of Equipment and/or risk the health and wellbeing of others.

“HRBP” has the meaning specified in Section 3.

“Medical Review Officer” means a licensed physician with expertise in substance abuse disorders who is engaged to receive and evaluate Drug and/or Alcohol Test results.

“Medication” means any Drug prescribed by a licensed healthcare practitioner (including but not limited to medically authorized Cannabis) or any Drug that is obtained legally without a prescription being required (i.e., over the counter).

“Near Miss” means an incident that had the potential to cause injury to an individual or damage to Equipment or property.

“Negative Test Result” means a report from the Medical Review Officer that an Employee or job applicant who provided a sample for a Drug and/or Alcohol Test did not have a reported Drug and/or Alcohol concentration equal to or in excess of the limits set out in Appendix A.

“Policy” has the meaning specified in Section 1.

“Positive Test Result” means a report from the Medical Review Officer that an Employee or job applicant who provided a sample for a Drug and/or Alcohol Test had a reported Drug and/or Alcohol concentration equal to or in excess of the limits set out in Appendix A.

“Prohibition” has the meaning(s) specified in Section 5.1.

“Safety Sensitive Position” means those positions described in Appendix B.

“Senior Leadership Team” means the President and all Vice Presidents of the Canada Business Unit.

“Substance Abuse Professional” means a person who is a licensed or certified professional who: (i) evaluates individuals who are seeking to be assessed or have been referred for assessment in respect of substance abuse, and (ii) is qualified to make recommendations regarding an individual being assessed, which recommendations may involve treatment options such as education, counselling, inpatient treatment programs, follow-up testing, and post-treatment follow-up care.

5. Policy Statement

5.1 Prohibited Conduct

In order to achieve the purposes of this Policy and to minimize the risks of unsafe or unsatisfactory performance due to the use of Drugs and/or Alcohol, the following are strictly prohibited when an Employee is on duty or on call for duty at a Company Workplace, or operating Equipment or a passenger in a vehicle:

- (a) not being Fit for Duty or engaging in disorderly conduct while under the influence of a Drug or Alcohol;
- (b) possessing, transporting, using or consuming any Drug and/or Alcohol, or possessing any empty containers therefor, other than Medications previously disclosed and/or authorized in accordance with this Policy;
- (c) manufacturing, producing, cultivating, selling or distributing any Drug and/or Alcohol;
- (d) receiving a Positive Test Result under this Policy;
- (e) tampering or attempting to tamper with a Drug and/or Alcohol Test sample;
- (f) failing or refusing to report for or undergo a Drug and/or Alcohol Test when required to do so under this Policy, including failing or refusing to agree to disclosure of a Drug and/or Alcohol Test result to the Company;
- (g) possessing, using and/or distributing any Drug Paraphernalia;
- (h) failing to report an incident or Near Miss that may lead to or would have led to a Drug and/or Alcohol Test under this Policy; and
- (i) failing to disclose a Drug and/or Alcohol addiction or dependency or failing to disclose use of a Medication that could or does impact Fitness for Duty, as required by this Policy, prior to receiving a notification to report for a Drug and/or Alcohol Test or involvement in a Drug and/or Alcohol-related incident or Near Miss.

The above prohibitions are individually referred to in this Policy as a “**Prohibition**” and collectively as the “**Prohibitions**”.

5.2 Company-Sponsored Events

Except as specifically provided in this Section 5.2, Employees are subject to the Prohibitions while attending or participating in Company-sponsored events or Company-paid off-site meals.

- (a) Company-sponsored events include all events that have been sanctioned, sponsored or paid for by the Company, regardless of whether the event takes place (1) during regular working hours or not, or (2) at a Company Workplace or not, excluding Company-paid offsite meals. A member of the Company's Senior Leadership Team may temporarily modify specific Prohibitions to permit the moderate and responsible availability and consumption of Alcohol during a Company-sponsored event, subject to all applicable Alcohol licenses/permits and serving requirements.
- (b) Company-paid offsite meals include individual meals served off-site from any Company Workplace and properly paid for through a Company expense report. An Employee may order limited Alcohol for individual consumption at a Company-paid offsite meal after regular work hours, subject to all applicable Alcohol licenses/permits and serving requirements.

Employees are expected to act responsibly at all Company-sponsored events and Company-paid offsite meals and to limit their consumption of Alcohol appropriately. No Employee may return to or go to any office or work location at a Company Workplace if they are not Fit for Duty after consuming Alcohol at a Company-sponsored event or Company-paid offsite meal. No Employee should ever operate a vehicle to or from a Company-sponsored event or Company-paid offsite meal while impaired by Drugs and/or Alcohol or while having a blood Alcohol level at or above any legally imposed limit for driving.

5.3 Use of Medication

(a) Use of Medication in General

Many Medications can affect job performance, including but not limited to depressants, stimulants, medical Cannabis, narcotics and opioids. Nonetheless, an Employee must always be Fit for Duty while at a Company Workplace notwithstanding the use of Medication. Accordingly, an Employee who is or will be taking Medication must discuss their job responsibilities and risks with their treating physician or pharmacist to determine whether the use of such Medication could potentially adversely affect their ability to work safely and effectively. In addition, an Employee must use Medication only for the purpose and in the dosage for which it is prescribed by the Employee's treating physician or as recommended by the pharmacist and manufacturer.

An Employee taking any Medication that could render or has the potential to render the Employee not Fit for Duty must promptly advise the Employee's supervisor, an HRBP, or the Occupational Health Office (780-334-5970).

The use of Medication disclosed in accordance with this Policy will not result in disciplinary action but may require reasonable and appropriate accommodation, such as reassignment, modified duties, or leave. The Company may request documentation to support any accommodation. Further follow-up by the Employee with their physician or pharmacist and evaluation of alternative Medication(s) may be advised by the Occupational Health Office and/or the Company.

(b) Use of Medical Cannabis

The Company recognizes that Employees may be medically authorized to use Cannabis. The Employee must provide valid medical documentation from their treating physician indicating that other non-

impairing treatment options have been considered and are not effective treatment options. Notwithstanding the foregoing, it remains a violation of this Policy for an Employee to report for duty or remain on duty and, upon testing, have a Positive Test Result for Cannabis.

An Employee who has a Positive Test Result for Cannabis is in violation of this Policy and subject to disciplinary action up to and including termination of employment for cause.

All Employees are prohibited from possessing and/or using Cannabis while at a Company Workplace, regardless of whether it is medically authorized or prescribed.

5.4 Support for Employees

The Company will support all Employees in their efforts to comply with this Policy, including by:

- (a) providing mandatory training to all Employees on understanding this Policy, the consequences of any Policy violations, resources available for Employee assistance services, and testing procedures;
- (b) providing confidential employee-assistance and counseling services through the Company's Employee and Family Assistance Program;
- (c) assisting Employees seeking to overcome substance abuse problems with locating a Substance Abuse Professional and treatment programs;
- (d) providing leave, accommodative work schedules and job modification(s) for Employees in substance abuse treatment or rehabilitation programs seeking to overcome substance abuse problems;
- (e) ensuring that Employee information is treated confidentially and in accordance with applicable privacy laws; and
- (f) making this Policy document available to all Employees.

5.5 Self Disclosure

Any Employee who:

- (a) has been advised by a Substance Abuse Professional or a medical professional that they may have a Drug and/or Alcohol addiction or dependency; or
- (b) otherwise suspects or there is a reasonable basis to suspect they have a Drug and/or Alcohol addiction or dependency,

is required to disclose their possible addiction or dependency to the Occupational Health Office (780-334-5970) prior to the occurrence of an incident where the Employee's Drug and/or Alcohol use is determined to be a contributing factor and prior to their being referred for any type of Drug and/or Alcohol Test provided for in this Policy.

Any Employee who discloses a Drug and/or Alcohol issue in accordance with the immediately preceding paragraph will be: (i) if they are then at work, removed from work; (ii) placed on leave; and (iii) be referred to a Substance Abuse Professional, if they are not already being treated by one, for an assessment for an addiction or dependency, the cost of which will be borne by the Company.

The Substance Abuse Professional's report will be provided to the Occupational Health Office for the purpose of implementing the provisions provided in this Policy section.

If the Substance Abuse Professional's report concludes that the Employee is **not** suffering from an addiction or dependency, the Employee will be required to undergo a return-to-work Drug and/or Alcohol Test and obtain a Negative Test Result. Upon obtaining a Negative Test Result, the Employee will be returned to work as soon as practicable.

If the Substance Abuse Professional's report confirms that the Employee is suffering from addiction or dependency, the Employee will be placed on leave and required to undergo treatment or rehabilitation in accordance with the recommendation of the assessing Substance Abuse Professional. The cost of a single treatment or rehabilitation program will be paid by the Company, except that if the Substance Abuse Professional has recommended or authorized a residential treatment or rehabilitation program, 75 % of the program cost will be paid by the Company and 25% must be paid by the Employee, unless otherwise determined by the Company. If the Substance Abuse Professional recommends a second treatment or rehabilitation program, the entire cost of the second treatment or rehabilitation program must be paid by the Employee, unless otherwise determined by the Company.

If the Employee successfully completes the recommended treatment or rehabilitation program(s), the Employee will be required to report for a return-to-work Drug and/or Alcohol Test and required to obtain a Negative Test Result prior to returning to work. If the Employee receives a Negative Test Result, the Employee will be returned to active duty, as soon as practicable. Upon return to work, the Employee will be subject to the requirements of this Policy.

If the Employee does not accept the Substance Abuse Professional's recommendation(s) regarding an appropriate treatment or rehabilitation program(s) or if the Employee does not attend and complete the recommended treatment or rehabilitation program(s), the Employee's employment with the Company may be terminated for cause.

If an Employee does not comply with the disclosure obligations in the Policy and submits a Positive Test Result or is involved in an incident where it is determined that the Employee's Drug (other than Medication disclosed and used in accordance with this Policy) and/or Alcohol use is a contributing factor, the Employee's employment with the Company will be terminated for cause.

Except as provided for in this Section 5.5, the Company will not impose other discipline on an Employee who has self-disclosed as provided in this Section 5.5 of the Policy.

5.6 Drug and/or Alcohol Testing

To help achieve the objectives of this Policy, the Company will conduct Drug and/or Alcohol Tests of Employees in the circumstances set out below and in accordance with the procedures set out in Appendix A.

(a) Pre-Employment

Any individual offered employment in a Safety Sensitive Position will, as stated in and as a condition of, any offer of employment, be required to undergo a Drug and/or Alcohol Test and obtain a Negative Test Result.

(b) Pre-Site Access

All Employees and employees of contractors must comply with site specific access policy provisions addressing Drug and/or Alcohol, such as the Surmont Site Access Policy and the Montney Site Access Orientation, including future revisions or replacements of those policies.

Subject to the Surmont Site Access Policy and the Montney Site Access Orientation, a supervisor, with the written concurrence of the Senior Leadership Team, may provide prior notice to and implement a protocol whereby all Employees and/or employees of contractors (if allowed under the applicable contract or amendment to that contract) working in Safety Sensitive Positions at a particular Company Workplace are required to undergo a Drug and/or Alcohol Test and obtain a Negative Test Result prior to being granted access to the specific Company Workplace for work involving Safety Sensitive Positions. The protocol may include a requirement for periodic Drug and/or Alcohol Tests and the obtainment of a Negative Test Result each time.

(c) Post-Incident

An Employee may be required to undergo a Drug and/or Alcohol Test and obtain a Negative Test Result promptly after a work-related incident as a part of an investigation into the work-related incident if, during Company business or while at the Company Workplace, the Employee is involved in the following: (i) any incident that results in a fatality and/or serious injury to any person; (ii) any incident that involves loss or damage to any Equipment; (iii) any environmental spill that is reportable to a regulatory agency or that has other potential significant impacts; and (iv) any incident or Near Miss where, following an immediate initial assessment, a supervisor or other Company official believes that Drugs and/or Alcohol may have been a contributing factor to the occurrence of the incident or Near Miss.

(d) Reasonable Cause

An Employee may be required to undergo a Drug and/or Alcohol Test and obtain a Negative Test Result if a supervisor, manager or other Company official (in either case, who is trained to identify Drug and/or Alcohol use or impairment) has reasonable cause to believe that the actions, appearance and/or conduct of the Employee while conducting Company business or at a Company Workplace are indicative that the Employee is or may be impaired by Drugs and/or Alcohol. The supervisor, manager or Company official may escort the Employee to safe and private location to interview the Employee and give the Employee an opportunity to explain why they appear to be impaired or otherwise not Fit for Duty. If there are potential medical concerns that are obvious to the supervisor, manager or Company official, the Employee may be referred for medical attention.

(e) Unannounced Random Testing

All Employees in Safety Sensitive Positions shall be subject to unannounced random Drug and/or Alcohol Tests. No more than 25% of Employees in Safety Sensitive Positions at each Company Workplace, as determined at the beginning of the calendar year, shall be required to undergo random Drug and/or

Alcohol Tests annually. Selection will be administered and conducted by an independent third party using an algorithmic computer process. An individual Employee may be randomly selected for more than one unannounced random Drug and/or Alcohol Test in any given calendar year.

An Employee will be notified if they have been selected for a random Drug and/or Alcohol Test after reporting for duty on the day of the Drug and/or Alcohol Test. Testing may occur on any day on which the Employee reports for duty, including holidays or weekends, and tests may occur during any shift, including night shifts. The Employee will be allowed thirty (30) minutes plus reasonable travel time to report for testing. Once notified, the Employee must report to the testing site.

(f) Return to Duty and Follow-up Testing

Prior to an Employee being permitted to return to active duty following a Policy violation, or, following treatment by a Substance Abuse Professional for a Drug and/or Alcohol addiction or dependency, the Employee shall be required to undergo a Drug and/or Alcohol Test and obtain a Negative Test Result. In addition, the Employee may be subject to periodic Drug and/or Alcohol Tests and obtain a Negative Test Result each time. The frequency and duration of any follow-up Drug and/or Alcohol Tests will be determined by a Substance Abuse Professional, with such program to be designed to assist the Employee in remaining Drug and Alcohol free while conducting Company business or at the Company Workplace. The Employee shall be informed of the duration of any follow-up testing program, but not the schedule. Failing to provide a Negative Test Result before returning to active duty or during a follow-up testing program is a violation of this Policy that may result in termination of the Employee's employment for cause.

6. Supervisor Responsibilities

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

A supervisor or manager having reasonable cause for believing that an Employee has consumed or is impaired by Drugs and/or Alcohol that may render the Employee not Fit for Duty shall remove that Employee from duty immediately, in accordance with Section 5.6 (d) "Reasonable Cause".

A supervisor or manager shall not permit an Employee to perform or continue to perform duties in a Safety Sensitive Position if that Employee refuses to undergo a Drug and/or Alcohol Test when required to do so in accordance with this Policy.

A supervisor or manager who has reason to believe that an Employee may have a Drug or Alcohol addiction or dependency problem, must consult with their HRBP.

In discharging responsibilities under this Policy, supervisors and managers must take all reasonable steps to ensure that information concerning an individual Employee is appropriately maintained in confidence as provided in this Policy and as required by applicable law.

7. Policy Violation and Consequences of a Policy Violation

Engaging in any conduct, action or failure to act described as a Prohibition in Section 5.1 ("Prohibited Conduct") is a violation of this Policy. Except as otherwise provided in this Policy, the consequences for

violating this Policy, including the failure to comply with the Prohibitions, will be based on an Employee's specific circumstances and the other circumstances surrounding the violation. Employees may be referred to a Substance Abuse Professional for assessment, rehabilitation and counselling, and/or face disciplinary action, up to and including termination of employment for cause.

Participation in and satisfactory completion of a Drug and/or Alcohol abuse assistance or rehabilitation program may become a condition of continued employment for an Employee following a violation of this Policy.

Any illegal substance will be turned over to the appropriate law enforcement agency or otherwise lawfully disposed.

An investigation may be conducted pursuant to the Company's incident investigation procedure and applicable law. The appropriate discipline and/or consequences (up to and including termination of employment for cause) in a particular case will depend on the nature of the Policy violation and the surrounding circumstances.

7.1 Pre-Employment Test Results

A job applicant for a Safety Sensitive position who receives a Positive Test Result for a pre-employment Drug and/or Alcohol Test will have their offer of employment rescinded, and the job applicant will be encouraged to seek assistance from a Substance Abuse Professional and permitted to reapply for available positions when they can meet the requirements of this Policy.

8. Confidentiality and Privacy

All Employee information received by the Company in connection with this Policy is confidential.

In connection with this Policy, the Company shall collect, use and disclose an Employee's (or employment applicant's) personal information only to the extent necessary for the administration of this Policy. Disclosure of such information will be limited to individuals having a reasonable need to know or where the disclosure is necessary for related health and safety concerns or is otherwise authorized by applicable law. Only information related to whether an Employee is Fit for Duty will be shared with the Employee's supervisor, manager or HRBP for the purposes of determining whether an Employee is Fit for Duty, appropriate work accommodations, and/or return-to-work initiatives.

Appendix A – Procedures for Drug and/or Alcohol Testing

General

The Company currently tests for Alcohol and the Drugs listed on page 2 of this Appendix A.

Testing will be conducted by a qualified and experienced Company representative or testing service provider. Collection of samples shall be done in a way that respects an Employee's dignity, privacy and confidentiality.

Collection Site and Consent

When a Drug and/or Alcohol Test is to occur, the Company will direct the Employee to a sample collection site designated by the Company or its third-party testing service provider. The testing procedure will be administered and explained to the Employee.

Employees will be requested to sign a consent form immediately prior to the time of sample collection. The consent form will acknowledge the release of complete results of the Drug and/or Alcohol Test to the Company's Medical Review Officer. A refusal to sign a consent form is treated as a refusal to test and is a violation of this Policy.

Alcohol Testing

Alcohol tests will be administered by a calibrated breathalyzer that meets evidentiary standards. If the initial screening test shows an Alcohol level that is equal to or greater than 0.020 grams of Alcohol per 210 litres of breath, the Employee will be required to undergo a confirmatory breathalyzer test.

Drug Testing

Drug tests will be administered by urinalysis and supplemented by oral fluid (saliva) testing. The Employee shall provide an initial urine sample, which will be split into two specimen containers. One of the split samples shall be immediately tested at the point of collection by immunoassay. If the initial screening test result shows the Employee has a Drug concentration equal to or in excess of the limits set out below indicating Cannabis, then the Employee shall be immediately required to provide an oral fluid sample for further confirmatory testing and the Employee shall be removed from duty pending the confirmatory test results.

All urine samples that are sent to an Accredited Laboratory will be tested using gas chromatography/mass spectrometry. Oral fluid samples will be analyzed using a similar process.

The Company's representative at the initial test site and the Company's testing service provider shall use appropriate chain of custody procedures to maintain control and accountability of all Drug and/or Alcohol Test samples.

The Accredited Laboratory will use the cut-off concentration levels shown in the charts below for screening and confirmatory tests for the following Drugs or classes of Drug:

- Amphetamine
 - Methamphetamine
 - Methylenedioxymethamphetamine (MDMA)
 - Methylenedioxyamphetamine (MDA)
- Cocaine
- Opioids
 - Codeine
 - Morphine
 - Hydrocodone
 - Hydromorphone
 - Oxycodone
 - Oxymorphone
 - 6-Acetylmorphine
- Methadone
- Cannabis
- Phencyclidine (PCP)
- Propoxyphene
- Fentanyl
- Benzodiazepines
- Barbituates

Drug Class	Urine Confirmation Cut off levels ng/mL
Amphetamines	250
Cocaine	100
Cannabis	15
Opioids	
Codeine/Morphine	2000
Hydrocodone/Hydromorphone	100
Oxycodone/Oxymorphone	100
6 Acetylmorphine (6AM)	10
Phencyclidine	25
Barbiturates	100
Benzodiazepines	50
Methadone	100
Propoxyphene	300
Fentanyl	1

Drug Class	Oral Fluid Confirmation Cut off levels ng/mL
Amphetamines	50
Cocaine	8
Cannabis	2
Opioids	
Codeine/Morphine	40
Hydrocodone/Hydromorphone	40
Oxycodone/Oxymorphone	40
6 Acetylmorphine (6AM)	4
Phencyclidine	10
Barbiturates	50
Benzodiazepines	10
Methadone	20
Propoxyphene	10
Fentanyl	1

Verification and Notification

The Medical Review Officer's primary functions under this Policy are the review of all Drug and/or Alcohol Test results, the determination of whether a Positive Test Result exists and, if so, the determination of whether an alternate medical explanation for a Positive Test Result exists and can be supported.

All Drug and/or Alcohol Test results will be forwarded to a Medical Review Officer. The Medical Review Officer shall review all Drug and/or Alcohol Test results and determine whether a Positive Test Result exists. The Medical Review Officer shall make reasonable efforts to report a Positive Test Result to the Employee and provide the Employee with an opportunity to discuss such results before advising the Company. The Employee may request that split Drug samples be re-tested, at the Employee's expense, by the Accredited Laboratory or sent to another Accredited Laboratory of their choosing.

The Medical Review Officer shall make their own determination as to whether a Positive Test Result or a Negative Test Result exists based on information gathered as part of their review process. The Employee's supervisor and HRBP will receive confidential reports of Positive Test Results. The HRBP will receive confidential reports of Negative Test Results. All health assessment information, including all Drug and/or Alcohol Test results and information, will be maintained as confidential personal information records.

Appendix B - Safety Sensitive Positions

A position is deemed 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, plant/facility operations, or construction, including the direct supervision thereof (including supervision exclusively from the office); or
- d) if the position has been determined 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 Position Employees only.
- Pre-employment drug testing of applicants will be limited to applicants for 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. An Employee whose employment is not terminated will be subject to other disciplinary action as is appropriate in the circumstances, including being required to successfully complete a program of treatment or rehabilitation, including follow up testing.