

<b>Document No:</b>	SD-POL-005	<b>Safety Department</b>	<b>Approval:</b>	J. Gortzen
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<b>Rev. No:</b>	0	<b>Policy</b>		
<b>Rev. Date:</b>		<b>Drugs and Alcohol</b>		

## 1 Who is covered by the policy?

1.1 This policy (“the policy”) applies to all personnel who are engaged in any work at the workplaces of World Power Products (WPP) - (“the Company”) in South Africa and all visitors to workplaces of the Company. This includes any person employed by the Company, all visitors, contractors and subcontractors of the Company, and their own personnel.

## 2 Obligation to comply with the policy

2.1 Compliance with the policy is a key obligation and requirement of your employment or engagement with the Company. You should read and familiarise yourself with:

2.1.1 the policy, and

2.2 If you are in any way uncertain about the requirements or operation of the policy, please raise any questions with management so that those matters can be clarified.

## 3 Aim of the policy

3.1 The Company’s highest priority is a safe workplace, and the consumption of alcohol and drugs can lead to unsafe working and injury, as well as lack of productivity and efficiency. The policy seeks to ensure that the Company and its employees comply with all legislative requirements in relation to the safety and health of its workforce, and any other legislation concerning the use of drugs and alcohol.

3.2 The Company’s objective is to prevent employees who are under the influence of drugs or alcohol from undertaking work, and to implement an effective process to identify and manage those whose fitness for work may be compromised by the effects of drugs or alcohol.

3.3 The policy aims to:

3.3.1 create a safe and healthy workplace free of the dangers associated with the effects of drug and alcohol use

3.3.2 foster an attitude that coming to work after consuming alcohol or drugs is not acceptable because it can cause risk to you, other employees and the public

3.3.3 actively seek solutions to those problems that contribute to alcohol and/or drug misuse

3.3.4 provide education and awareness training for all employees to overcome the inappropriate use of drugs or alcohol, and

3.3.5 ensure an effective management and rehabilitation process is available to workplace employees with a drug or alcohol problem.

## 4 Clients’ drug and alcohol policies

4.1 The Company often makes its services available to clients of the Company. Where any client of the Company has its own policy relating to drugs and alcohol in the workplace, and you are performing work for that client, you must familiarize yourself with

that policy and abide by it in addition to abiding by this policy. Where a client's policy is more stringent than this policy, you must abide by the client's policy.

## **5 Prohibited conduct**

5.1 The Company prohibits the following conduct, subject to the exceptions set out in the policy:

5.1.1 attending work having consumed or used drugs or alcohol (where the blood alcohol content is more than 0.00%)

5.1.2 the possession, sale, supply, manufacture or consumption of alcoholic beverages by any employee in the workplace

5.1.3 the consumption, use, possession, sale, supply, manufacture or cultivation of any non-prescribed drug by any employee in the workplace, and

5.1.4 using prescription or over the counter medication other than for its intended purpose, or in excessive quantities.

5.2 Conduct prohibited by the policy is considered to be a serious disciplinary matter, and may result in the termination of your employment with the Company.

## **6 Voluntary disclosure of alcohol or drug problem**

6.1 The Company recognizes that dependence on alcohol or drugs may become an illness. If you believe you have a drug or alcohol problem, we encourage you to talk to your manager. Where appropriate, the Company will provide you with help under our employee assistance program. If you voluntarily disclose an alcohol or drug problem, you will not be disciplined unless you are engaged in an illegal activity at the workplace or during work time.

6.2 If you have voluntarily disclosed a drug or alcohol problem, in order to ensure the safety of yourself and others, the Company may not be able to let you continue in your current position until you have completed treatment. The Company will make every effort to offer you alternative duties if these are available. However, continuing abuse of drugs or alcohol may lead to disciplinary action against you.

## **7 Obligation to report**

7.1 If you are concerned about your fitness for work due to consumption of alcohol or drugs, you must inform your supervisor or manager before starting work.

7.2 In the interest of the safety of your fellow employees, you or your supervisor must also discuss with your manager and your manager's manager, any suspicion or belief that a fellow employee has attended or is attending work under the influence of alcohol or drugs.

## **8 Alcoholic beverages**

8.1 Alcoholic beverages may only be consumed at the workplace with the special permission of the site manager. Normally this will be for special occasions only.

8.2 If you attend a function on behalf of the Company at which alcohol is available, you must drink sensibly and responsibly so that your behaviour does not compromise any person's health or safety, or cause damage to the Company's reputation or business standing. Your behaviour must also remain within the limits of any applicable law. Disciplinary action, including termination of employment, may result if you fail to observe these requirements.

## **9 Prescribed drugs and over the counter medication**

9.1 The policy is not intended to restrict any medical professional, paramedic, pharmacist or other qualified medical practitioner or medical assistant from prescribing drugs for medicinal purposes.

9.2 However the use of prescribed drugs and over the counter medication may adversely affect your behaviour, capabilities and performance. This is even where use is bona fide and at normal dosages. We all have responsibility to take account of the potential side effects of such drugs and medicines on our performance and behaviour in the workplace and while driving on Company business.

9.3 If you are using a prescribed drug, you must ask your doctor whether the dose will adversely affect your ability to work in a safe and efficient manner. You must be able to produce a letter about the prescription from your doctor within a reasonable timeframe if your supervisor or manager requires it. You will not be in contravention of the policy as a result of taking a drug prescribed to you by a medical practitioner in accordance with the prescription, provided that:

9.3.1 you do not consume a level of the drug in excess of that which you have been prescribed to take

9.3.2 the nature of the drug and/or the quantity consumed does not have the potential of impairing your safe and efficient performance of your duties. If you are in doubt, you should seek advice from your medical practitioner

9.3.3 if the prescription drug is a benzodiazepine, amphetamine, barbiturate, or methadone, you must not work whilst using it or affected by it until you are clear of the drug, or have been certified by a doctor as being fit for work, and

9.3.4 you are able to produce a letter about the prescription from your Doctor to your supervisor or manager upon request.

9.4 You must report any side effects in connection with the use of prescription drugs or other drugs (for example dizziness, drowsiness, fatigue, impaired vision, sweating, chills, unsteadiness etc) to your supervisor or manager. You must comply with any direction given to you by your supervisor or manager.

9.5 If you are using a prescribed drug:

9.5.1 which is not prescribed for you by a medical practitioner, or

9.5.2 other than for its intended purpose, or

9.5.3 in quantities in excess of those specified by your medical practitioner, the Company will treat this as a breach of the policy in the same manner as for non-prescribed or illegal drugs.

9.6 If you are using over the counter medication:

9.6.1 other than for its intended purpose, or

9.6.2 in quantities in excess of those specified by the manufacturer, the Company will treat this as a breach of the policy in the same manner as for illegal drugs.

9.7 If you use, hold, sell, or distribute in the workplace a prescribed drug which has not prescribed to you by a medical practitioner, the Company will treat this as a breach of the policy in the same manner as for illegal or non-prescribed drugs.

## **10 Illegal drugs**

10.1 The Company will not condone illegal acts and anyone found in possession of, trafficking, using or selling illegal drugs at the workplace, on Company property or otherwise during employment by the Company will be subject to immediate disciplinary action for gross misconduct. If proven, and subject to any mitigating factors, the disciplinary consequences will be summary dismissal.

## **11 Workplace testing for drugs and alcohol**

11.1 Workplace testing for drugs and alcohol is increasingly necessary because of the recognized risks of drug and alcohol use to workplace health, safety and job performance.

11.2 As part of the policy, employees, contractors and employees of contractors may be subject to urine and/or breath testing. The following drug and alcohol testing activities will be undertaken:

11.2.1 pre-employment drug screening

11.2.2 where an incident or circumstances give reasonable cause for concern, or

11.2.3 randomly at designated sites where required by legislation or contractual obligations.

## **12 Thresholds for testing**

12.1 The threshold for alcohol testing is 0.00 grams per millilitre unless legislative, contractual or site requirements mandate a lower level. A test result of this amount or higher will constitute a breach of the policy.

12.2 Test results are considered positive for drugs where:

12.2.1 the detected level of the substance exceeds the relevant threshold level for substances described in Schedule 2 to the policy, and

12.2.2 a medical practitioner employed or engaged by the Company certifies that, in his or her opinion, such detected level constitutes a risk to your health or safety, or that of other employees, or might reasonably be expected to have impaired your safe and efficient performance of your duties.

## **13 Consequences of a positive test**

13.1 If you:

13.1.1 test positive to a breath test, or

13.1.2 test positive to a urine test, or

13.1.3 refuse to comply with any request to provide a breath or urine sample pursuant to the policy the Company will ordinarily give you written notice of that fact and hold a resolution meeting with you within three days of the written notice to review the circumstances, unless it is impractical to do so, or the Company considers that the incident does not warrant further review.

13.2 You are entitled to have a representative of your choice at the resolution meeting.

13.3 You may be stood down on full pay before the resolution meeting pending the outcome of the meeting.

13.4 At the meeting, the circumstances of the incident will be examined. You will have the opportunity to respond to any allegations made against you, and to place any evidence or information before the Company which you consider relevant in order to show that:

13.4.1 the reported positive test result should not be treated as valid, or

13.4.2 you had a valid reason for failing to comply with any request to provide a sample.

13.5 The Company will only find a test result to be invalid in circumstances where the sample collection procedures give rise to a significant and reasonable doubt in respect of the accuracy and reliability of the collection process, the sample security, the chain of custody of the sample, or the analysis of the sample by any relevant laboratory.

## **14 Disciplinary procedures**

14.1 The Company regards any breach of the policy to be a matter of utmost seriousness.

14.2 A confirmed positive result will result in the commencement of disciplinary procedures against you, and you could be dismissed.

## **15 Refusal to be tested**

15.1 If you refuse to submit to a drug or alcohol test during employment without good reason, this will be treated as a breach of the policy. You may not be allowed to continue in your current position, and you could be dismissed.

15.2 If you are reasonably unable, by reason of significant personal injury or incapacity to submit to an alcohol or drug test in accordance with the policy, you will not be treated as being in breach of the policy. However, the Company may require you to submit to an alcohol or drug test at the earliest practicable time.

## **16 Contractors**

16.1 If you are an employee of a contractor, and you test positive, or unreasonably refuse to submit to a test, the company may ask the contractor to remove you from carrying out Company work. The Company will also decline you access to the workplace and Company premises.

## **17 Transport arrangements**

17.1 If you are not permitted to work, or you have been required to leave the workplace due to any breach or suspected breach of the policy, you must not drive or operate any vehicle on or from the workplace site. Managers will arrange alternative means of leaving the workplace for you.

## **18 Counselling**

18.1 If you return a positive test result, you may be required by the Company to undergo one or more sessions of counselling by a professional counsellor. Such counselling will address the hazards created by the use or misuse of alcohol or drugs in the workplace, and any drug or alcohol dependency you may have. You must attend such counselling sessions as are directed by the Company, or the professional counsellor. Counsellors may also recommend follow up treatment for you.

18.2 If you are requested to attend counselling, or counselled to seek medical treatment, you must attend counselling or seek medical treatment and provide to the Company written confirmation or evidence that you have done so. Any refusal or failure to attend counselling or medical treatment sessions may be considered a breach of the policy, and may warrant further disciplinary measures in accordance with the policy, including possible dismissal.

## **19 Further testing**

19.1 If you return a positive test result in respect of testing pursuant to the policy, and are permitted to remain in employment, you may be required to undertake regular subsequent tests in order to monitor your ongoing compliance with the policy.

## **20 Drug and alcohol education**

20.1 The Company will provide written educational materials for you in relation to the use and misuse of alcohol and drugs. Counselling, assistance and rehabilitation programs will be identified and promoted by the Company during education sessions and induction programs for employees.

20.2 Information packs will be available and training will be conducted to assist in communicating the benefits of the policy, and to provide information concerning drugs and alcohol testing. Induction training and other educational material will be available for new employees, contractors and visitors.

## **21 Privacy**

21.1 The Company respects the privacy and confidentiality of its employees, and will ensure that strict standards are maintained in the implementation and administration of alcohol and drug testing.

21.2 The Company will take all reasonable steps to ensure that the following remain confidential between you and your manager:

21.2.1 test results in relation to any sample you have provided

21.2.2 any investigation in relation to test results and

21.2.3 participation in counselling or rehabilitation services.

21.3 However, the Company may need to disclose the outcome of such tests results and investigations in order to conduct any review or to give effect to any disciplinary measures, or where required by law.

## **22 Employee cooperation**

22.1 The cooperation and support of all employees in the implementation of the policy is essential to ensure that the operations of the Company at its premises in South Africa and overseas and the environment in which employees are required to work, are safe and healthy, and free from the unwelcome effects of drug or alcohol use.

22.2 If you believe that you are affected by alcohol or drugs of any kind, do not come to work and endanger the safety of yourself or your workmates. If you have a problem, or consider that you may be drug dependent, it is your responsibility to seek help. You should feel free to approach you supervisor or manager or other appropriate personnel from the Company for assistance.

## **23 Variations**

23.1 The company after enacting a consultation process with employees may implement variations or amendments to the policy by giving written notice to employees to that effect. Such variations or amendments shall have the same force and effect as if included in the policy from the time at which you receive such notice.

## **24 Definitions**

24.1 In the policy:

24.1.1 “employee” means any servant, agent, officer or other personnel of the Company, any contractor or sub-contractor of the Company and any servant, agent, officer or personnel of such contractor or sub-contractor

24.1.2 “workplace” means all of those areas of the Company including where an employee works or is likely to be during the course of their hours of work, or any place at which an employee is likely to be working in the course of carrying out their duties in connection with the Company in South Africa.

## **25 Schedules**

25.1 The schedules are attached to, and form part of, the policy.

Schedule 1 to policy on drugs and alcohol in the workplace

### **CARRYING OUT DRUG AND ALCOHOL TESTING**

#### **1 Testing agency**

(a) The Company has engaged an independent workplace drug testing company (“the testing agency”) to assist the Company in carrying out drug and alcohol testing.

(b) The testing agency will carry out sampling and testing for alcohol and drugs in accordance with the company’s policy on drugs and alcohol in the workplace (“the policy”).

#### **2 Obligation to comply**

(a) You are required to comply with any reasonable request made by:

2.1.1 a representative of the testing agency accompanied by or supervised by an officer of the Company; or

2.1.2 an authorized officer of the Company in relation to testing for drugs or alcohol, including provision of a breath or urine sample.

(b) The consequences for refusing to provide a breath or urine sample are set out in clause 15 of the policy.

### 3 When testing will take place

(a) The testing agency will undertake testing for drugs and alcohol in the following circumstances in accordance with clause 11 of the policy:

3.1.1 pre-employment drug screening

3.1.2 where an incident or circumstances give reasonable cause for concern, or

3.1.3 randomly at designated sites where required by legislation or contractual obligations

### 4 Incident or circumstances giving reasonable cause for concern

(a) Incidents or circumstances which give reasonable cause for concern, include, but are not limited to where:

4.1.1 you or another person require treatment as an in-patient in a hospital as a result of an incident occurring in the workplace

4.1.2 you or another person lose consciousness at the workplace due to the impact of physical force, exposure to hazardous substances, electric shock or lack of oxygen

4.1.3 you or another person require medical treatment by a medical practitioner for:

(1) amputation of any part of the body

(2) loss of sight of an eye

(3) compound fracture

(4) serious lacerations requiring stitching and/or stapling

(5) third degree burns occurring in the workplace

4.1.4 any of the following occurs at the workplace:

(i) a collapse, overturning, malfunction and damage to plant or vehicles

(6) a collapse or partial collapse of a building, structure or excavation

(7) an implosion, explosion of fire [uncontrolled, not necessary]

(8) a spillage or leakage of a hazardous substance

(9) a fall or release from part of any plant, substance or object

(10) violation of the requirements of a "permit to work" issued by the Company

### 5 Disclosure of drugs or alcohol used

(a) The representative of the testing agency may request you to list in writing any over-the-counter or prescription drugs or other substances which:

5.1.1 you have used or consumed in the seven days prior to the collection of the sample for the test, and

5.1.2 which may effect the result of your test.

You should comply with any such requests

### 6 Collection procedures

(a) The testing agency will substantially follow the collection procedures of urine and breath samples for drug and alcohol tests set out in Schedule 3 to the policy.

(b) Breath samples will be collected and recorded using a breath testing instrument approved by the company or the testing agency.

## 7 Witness

(a) If you are requested to undergo a breath or drug test, you may nominate one other person to attend as a witness.

## 8 Pre-employment drug testing

(a) If you are applying to work for the company, you may be required to provide a urine sample to a medical doctor or the testing agency for the purpose of drug testing prior to commencing work at an ABB work place.

(b) If you do not undertake the test, or you do not satisfy the requirements of the test as set out in clause 12 of the policy, you will not be offered employment with the company.

## 9 Requirement to co-operate fully with testing agency

(a) If you, without reasonable cause:

(i) fail to comply with any request to provide a breath or urine sample or

(ii) fail to reasonable co-operate in relation to sample collection procedure or

(iii) refuse to sign or complete an sample collection documents or labels

you will be guilty of a serious breach of the policy, and you may be subject to disciplinary procedures in accordance with the policy.

## 10 Interference with testing procedure

(a) If you:

(i) avoid, tamper with, or falsify any breath or urine sample

(ii) substitute for another employee or substitute a sample for another employee or arrange or are involved in a substitution of a sample or

(iii) aid or abet any person to interfere with a test or a test result, or

(iv) attempt to do any of the above you will be guilty of a serious breach of this policy, and may be subject to disciplinary measures in accordance with the policy.

## **This Policy applies to all employees of WPP**

Schedule 2 to policy on drugs and alcohol in the workplace Prohibited Drugs and Substances

The categories of drugs and substances prohibited by WPP are listed below. The threshold level at which a positive drug result for each category in AS 4308 is listed and set out in Table 1.

1. Alcohol.

[An employee with a blood alcohol content of more than 0.00%]

2. Opiates. [Morphine, codeine and monoacetyl morphine.]

3. Sympathomimetic amines. [Amphetamines, methylamphetamine, methylenedioxy methamphetamine (MDMA), phentermine, including ephedrine and pseudoephedrine.]

4. Cannabis metabolites. [Tetrahydrocannabinol-9-carboxylic acid (THC).]

5. Cocaine metabolites. [Benzoyl ecgonine and ecgonine methyl ester.]



6. Benzodiazepines. [Oxazepam, temazepam, flunitrazepam, diazepam, nitrazepam, clonazepam or their metabolites.]

**Table 1**

Threshold Level for Positive Test Results

Compound	Cut-off level (ug/L)+
Morphine*	300
Codeine	300
Amphetamine	300
Methylamphetamine	300
Methylenedioxymethamphetamine	300
Phentermine	500
tetrahydrocannabinol-9-carboxylic acid	15
Benzoyllecgonine	150
Ecgonine methyl ester	150
Oxazepam	200
Temazepam	200
Daizepam	200
Nordiazepam	200
7-amino-clonazepam	200
7-amino-flunitrazepam	200
7-amino-nitrazepam	200