# PARAMOUNT RESOURCES LTD. DRUG AND ALCOHOL POLICY

Paramount Resources Ltd. and its affiliates and subsidiaries (collectively referred to herein as "Paramount") are committed to promoting the health, safety and wellness of its Employees, Contractors and the public. Paramount recognizes and accepts the responsibility to provide Employees with a safe, healthy and productive work environment. Employees have the responsibility to report to work capable of performing their tasks productively and safely. Being Unfit for Duty or under the influence of Drugs or Alcohol can have serious adverse impacts on the workplace. Workplace accidents resulting from Impairment can also result in liability under workplace safety legislation, and corporate and personal liability under the *Criminal Code* (Canada). Paramount has established a comprehensive set of Drug and Alcohol Policy Guidelines which shall be read in conjunction with and as a supplement to this Drug and Alcohol Policy. Paramount's Drug and Alcohol Policy and Drug and Alcohol Policy Guidelines shall be collectively referred to as the "Policy".

The purposes of this Policy are to support workplace health and safety; to address and minimize the risks in the workplace associated with Drugs and Alcohol and to ensure Fitness for Duty; to establish Paramount's expectations for appropriate behaviour; to describe the possible consequences for non-compliance; and to provide support and resources to Employees who are dealing with substance abuse or dependency problems. This Policy outlines the expectations regarding Fitness for Duty, and the prohibitions against the use and possession of Drugs and Alcohol. This Policy supports Paramount's Health, Safety and Environment Policy and is only one facet of an overall approach to risk mitigation and safety.

All Employees and all Contractors providing services to Paramount are expected to report to work and remain Fit for Duty throughout their shift and when designated on-call. The following are strictly prohibited while on Paramount Premises, operating a Paramount vehicle or equipment, at Paramount sponsored or supported events and when representing Paramount or conducting Paramount Business:

- Consuming or being under the influence of Drugs or Alcohol;
- Possessing, distributing, offering or selling Drugs, Drug paraphernalia or Alcohol;
- Being Unfit for Duty as a result of consuming or improperly using any Medication:
- Possessing prescription Medication without a legally obtained prescription; and
- Distributing, offering or selling prescription Medication.

Paramount has established this Policy in order to balance our respect for individuals with the need to maintain a safe work environment. Violations of this Policy will result in disciplinary action up to and potentially including termination of employment or termination of services.

James H. N. Riddell

President & Chief Executive Officer

October 10, 2018

## **PARAMOUNT**

#### DRUG AND ALCOHOL POLICY GUIDELINES

Date Developed:

October 30, 2013

Approved by:

James H. T. Riddell, President & Chief Executive Officer

Revision date:

October 10, 2018

The following are guidelines for carrying out Paramount's Drug and Alcohol Policy.

#### 1. Definitions

The following words and terms shall have the following meanings:

- Alcohol means the intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohols including methyl and isopropyl.
- Alcoholic Beverage means any beverage containing Alcohol including beer, wine, distilled spirits and similar products.
- BAC means blood Alcohol content.
- Contractors means all consultants and third party contractors, subcontractors and service providers, and their employees and representatives.
- Drug means any substance (illegal or otherwise), the use of which has the potential to negatively impact a person's judgment, perception, dexterity or motor control, (but, for clarity, excludes Medications).
- EAP means Employee Assistance Program.
- Employee means all Paramount employees, including but not limited to senior management, managers, supervisors, full-time employees, part-time employees, off-site employees, students and apprentices.
- Fitness for Duty and Fit for Duty means being alert and able to safely and acceptably perform assigned duties.
- Impairment or Impaired means being under the influence of Drugs, Alcohol or Medication to the extent that an Employee is Unfit for Duty or is otherwise in a physical or mental condition that creates a risk or potential risk to the safety and well-being of the individual, other Employees, the public, the environment or Paramount's property.
- Medication means a Drug obtained legally, either over-the-counter at a licensed pharmacy or through a doctor's prescription.
- Medication of Concern means a Medication that causes or has the potential to cause Impairment.
- Near Miss means an unplanned workplace event which does not cause a Significant Incident but had the potential to do so.

- Paramount Business means all activities undertaken by Employees in the course of performing their work duties, whether conducted on or off Paramount Premises.
- Paramount Premises includes but is not necessarily restricted to all land, facilities, mobile equipment and vehicles owned, leased, or otherwise directly controlled by Paramount.
- Policy means Paramount's Drug and Alcohol Policy and these Drug and Alcohol Policy Guidelines.
- Safety Sensitive Positions means positions where the person has a role in operations (which, for clarity, can include an oversight, supervisory or similar role regardless of whether it is performed at a field or office location) where Impairment could directly cause, result in or contribute to a Significant Incident.
- Significant Incident means an incident that resulted in:
  - o A fatality;
  - A serious personal injury to a worker (medical treatment or worse), a member of the public or any other individual;
  - o An incident with a potential for serious personal injury to a worker (medical treatment or worse), a member of the public or any other individual;
  - o An environmental incident or a potential environmental incident with significant consequences;
  - A significant or potential for significant loss or damage to Paramount property or equipment; or
  - A significant or potential for significant loss of revenues to Paramount or the payment of damages or other amounts.
- Supervisor and/or Manager means the individual accountable for a particular facility, department or area, including managers and others in supervisory positions directly responsible for the performance of Employees.
- Test or Testing means any testing for Drugs, Alcohol or Medication that may be required
  under this Policy which, for clarity, includes breathalyzer, urinalysis or any other form of
  testing procedure.
- Unfit for Duty means an Employee is not Fit for Duty.

## 2. Application

a) Employees

This Policy applies to all Employees.

In the event that an affiliate or subsidiary of Paramount Resources Ltd. has its own policy or program with respect to Drugs and Alcohol, that policy or program shall apply to employees of

the affiliate or subsidiary, as the case may be. If they do not have such a policy or program, or to the extent that the policy or program of the affiliate or subsidiary does not meet the requirements set out in this Policy, then such employees will be subject to and expected to adhere to this Policy in the same way as if they were Paramount Employees.

#### b) Contractors

All Contractors shall have or are encouraged to implement their own policy which meets or exceeds the standards set out in this Policy. Upon request by Paramount, Contractors must provide a copy of their policy and evidence that Contractors working on Paramount Premises are in compliance.

This Policy shall apply to Contractors who do not have a Drug and Alcohol policy or program, or to the extent that the Contractor's Drug and Alcohol policy or program does not meet the requirements set out in this Policy. Such Contractors will be required to ensure the standards and guidance set out in this Policy are met by everyone assigned to Paramount Business in the same manner and to the same extent as if they were Paramount Employees.

This Policy is not to be construed as creating any additional obligations of Paramount to Contractors or employees of any affiliate or subsidiary of Paramount Resources Ltd. For further clarity, any reference throughout this Policy with respect to benefits afforded to Paramount Employees through Paramount's People Operations department, Health, Safety and Environment department, or the EAP, are not applicable to Contractors, whether or not they are required to meet the standards of this Policy. Any obligations, benefits or otherwise, owed to any Contractor by Paramount are strictly limited to those set out in written agreements between the Contractor and Paramount.

#### 3. Responsibility

All Employees are required to perform their job safely and in strict compliance with all applicable rules, policies and procedures. In addition, every Employee is required to:

- a) Read, understand and fully comply with this Policy;
- b) Report for work Fit for Duty and remain Fit for Duty while on Paramount Business;
- Report any Significant Incident or Near Miss as defined in this Policy to their Supervisor or Manager immediately after the Significant Incident or Near Miss and participate fully in any subsequent investigation;
- d) Notify their Supervisor or Manager if they believe a co-worker, Contractor or visitor is Unfit for Duty or is under the influence of Drugs or Alcohol while on Paramount Business;
- e) Co-operate with any safety-related work modification, restriction or prohibition;
- f) Co-operate with any investigation into an actual or suspected violation of this Policy, including any requests to undergo Testing as and when required under this Policy; and
- g) Notify their Supervisor or Manager if they have a current or emerging problem relating to Drug, Alcohol or Medication abuse or dependency, and follow advice regarding treatment, including recommended monitoring programs after attending treatment.

## Paramount is responsible for:

- a) Ongoing leadership and supervision to ensure safe operations and effectiveness of the Policy;
- b) Determining and providing appropriate levels of training for Employees;
- c) Guiding Employees who voluntarily seek assistance for a personal problem to appropriate resources (e.g. People Operations department, Health, Safety and Environment department, EAP and/or other local resources) while maintaining confidentiality in accordance with this Policy;
- d) Taking appropriate steps to investigate any possible violation of this Policy; and
- e) Implementing the requirements of this Policy.

Shared Responsibility: We all share responsibility for maintaining a safe and productive workplace.

All Employees are responsible for compliance with this Policy and, in addition, for:

- a) Always striving to keep the work environment safe;
- b) Supporting fellow co-workers in seeking help;
- c) Using the EAP when support is needed; and
- d) Reporting dangerous or suspicious behaviour to a Supervisor or Manager.

It is the Supervisor or Manager's responsibility to also:

- a) Observe Employee performance and behaviour;
- b) Treat information shared by Employees under this Policy as confidential;
- c) Investigate reports of dangerous practices;
- d) Document changes and problems in performance; and
- e) Clearly inform Employees of the consequences of Policy violations.

#### 4. Communication

Communicating this Policy to all Employees is critical to our success. To that end:

- a) All Employees will receive an electronic copy of the Policy;
- b) The Policy will be reviewed in orientation sessions with new Employees;
- c) Employee education about the dangers of Drug, Alcohol and Medication use, and the availability of help, will be made available to Employees through the Health, Safety and Environment or People Operations department; and

d) Appropriate Supervisors and Managers will receive training to help him/her recognize and manage Employees with Drug, Alcohol and Medication problems.

#### 5. Standards

All Employees are required to adhere to the following standards.

#### a) Alcohol

The following are strictly prohibited while on Paramount Premises, operating a Paramount vehicle or equipment, at Paramount sponsored events and whenever an Employee is representing Paramount or conducting Paramount Business:

- i) Consuming or being under the influence of Alcohol; and
- ii) Possessing, distributing, offering or selling Alcohol.

On an exceptional basis, Alcoholic Beverages may be served on Paramount Premises, at Paramount sponsored events, or while conducting Paramount Business with the explicit approval of management. Employees who are permitted to consume Alcoholic Beverages on such occasions are required to exercise moderation and good judgment and shall not operate a motor vehicle or equipment with a BAC above the legal standard.

## b) Drugs

The following are strictly prohibited while on Paramount Premises, operating a Paramount vehicle or equipment, at Paramount sponsored events and whenever an Employee is representing Paramount or conducting Paramount Business:

- i) Consuming or being under the influence of Drugs; and
- ii) Possessing, distributing, offering or selling Drugs or Drug paraphernalia.
- c) Medication and Improper Use of Medication

All Employees are expected to use Medication responsibly and as directed by their physician or pharmacist. Employees are required to investigate through their doctor or pharmacist whether a Medication can cause Impairment and take appropriate steps to ensure that the use of such Medication will not affect their Fitness for Duty. Employees must report their use of a Medication of Concern to their Supervisor or Manager so that appropriate precautionary measures may be taken or restrictions imposed, if required. Paramount may require Employees to provide additional information (such as dosage and frequency of use) and provide confirmation from their doctor or physician that their use of a Medication (including, for clarity, a Medication of Concern) will not affect their Fitness for Duty.

The following are strictly prohibited while on Paramount Premises, operating a Paramount vehicle or equipment, at Paramount sponsored events and whenever an Employee is representing Paramount or conducting Paramount Business:

- i) Being Unfit for Duty as a result of consumption or improper use of any Medication;
- ii) Possessing prescription Medication without a legally obtained prescription; and

iii) Distributing, offering or selling prescription Medication.

#### 6. Employee Requirements

Employees must comply with the following requirements:

- a) Report Fit for Duty and remain Fit for Duty while at work;
- b) When designated on-call, Employees must remain Fit for Duty to respond to a call and be in compliance with this Policy;
- c) If an Employee is Unfit for Duty or under the influence of Drugs or Alcohol, and is contacted by Paramount to perform unscheduled services, the Employee must decline the work request in accordance with Paramount's On-call Policy;
- d) Report for Testing and participate in Testing as required and promote the integrity of the Testing process without tampering, adulterating or interfering with Testing (e.g. masking agents, diluting, etc.);
- e) Employees must report to their Supervisor or Manager a current or emerging problem relating to Drug, Alcohol or Medication abuse and follow advice regarding appropriate treatment, including recommended monitoring programs after attending treatment. Paramount will take reasonable steps to place the Employee in another position, or on modified or restricted duties, while the Employee is seeking help in overcoming their problems or is involved in rehabilitation efforts. For clarity, Paramount will not discipline an Employee for voluntarily self-reporting a Drug, Alcohol or Medication abuse related problem unless this disclosure occurs after:
  - i) a Significant Incident or Near Miss has occurred;
  - ii) the Employee has been notified that they must report for a Test; or
  - iii) the Employee has otherwise breached this Policy;

in which case the Employee could be subject to discipline up to and including termination of Employment;

- f) Employees must advise a Supervisor or Manager as soon as possible if they believe that any other person:
  - i) may be Unfit for Duty,
  - ii) may be under the influence of Drugs or Alcohol, or
  - iii) may otherwise be in violation of this Policy.
- g) Employees must, when requested, participate fully in any investigation under this Policy.

# 7. Safety Sensitive Positions

Because of the greater risk involved in performing certain functions, some positions may be designated as Safety Sensitive Positions. Employees holding Safety Sensitive Positions with

Paramount will be subject to additional requirements. In addition to reporting and remaining Fit for Duty, and complying with the other provisions of this Policy, any Employee in a Safety Sensitive Position taking a Medication of Concern must report this to their Supervisor or Manager. Any Employee in a Safety Sensitive Position taking a Medication of Concern will not be permitted to perform Safety Sensitive-related duties for so long as such Employee is taking such Medication of Concern, and such Employee may be placed in another position, or on modified or restricted duties, or may be prohibited from working, in compliance with relevant laws.

#### 8. Investigation Procedures

# a) Employees

- i) Performance Management: Regular supervision, training and performance management are integral to the maintenance of a safe workplace. Employees with performance problems will be reminded that they should access assistance if a personal problem affects their job performance.
- ii) Unfit for Duty: When there are reasonable grounds to believe that an Employee is Unfit for Duty or under the influence of Drugs or Alcohol, the Employee will be escorted to a safe place and given the opportunity to explain why he or she appears to be Unfit for Duty or under the influence of Drugs or Alcohol. If the explanation is not reasonable, and/or the Supervisor or Manager conducting the interview still believes that the Employee is Unfit for Duty or under the influence of Drugs or Alcohol, one or more of the following steps may be taken:
  - The Employee may be referred for medical attention if there are immediate medical concerns; and
  - The Employee may be subject to Testing in accordance with Section 9 of this Policy.

The Employee will not be allowed to return to the worksite. As soon as it is safe and practicable to do so, the Employee will be transported to a collection site to be specified by Paramount for Testing or to a hospital/clinic, depending on the circumstances, and then to their local place of residence or the care of another adult person. At no time is the Employee to operate a Paramount vehicle or equipment, or conduct Paramount Business, until the matter has been resolved. The Employee may be temporarily removed from their duties, placed on leave of absence or reassigned pending completion of any investigation.

iii) Investigation of Misconduct: Paramount reserves the right to investigate any situation where there are reasonable grounds to believe that a possible Policy violation has occurred. Supervisors and Managers are responsible for identifying situations where an investigation is justified based on a combination of indicators which could include behaviour, odour, or presence of Drugs, Drug paraphernalia or Alcohol. Supervisors and Managers will be responsible for advising either the Health, Safety and Environment department or the People Operations department of the situation, who, after consultation, will make the final decision as to whether and how to initiate an investigation.

#### b) Contractors

- i) Performance Management: Regular supervision, training and performance management are integral to the maintenance of a safe workplace. Contractors with performance problems should access assistance through their employer if a personal problem affects their job performance.
- ii) Unfit for Duty: When there are reasonable grounds to believe that a Contractor is Unfit for Duty or under the influence of Drugs or Alcohol, the Contractor will be removed from the work site and escorted to a safe place. The Contractor or the Contractor's employer will be informed that the Contractor is Unfit for Duty or under the influence of Drugs or Alcohol and a request for testing in accordance with the Contractor's Drug and Alcohol policy or program, or Testing under this Policy if applicable, will be made. If the Contractor does not have a Drug and Alcohol policy or program, or the Contractor's Drug and Alcohol policy or program does not meet the requirements set out in this Policy, the Contractor must ensure that the standards and guidance set out in this Policy are met by the Contractor in the same manner and to the same extent as if the Contractor was a Paramount Employee.

## 9. Testing

Employees may be required to undergo Testing in the following circumstances.

a) Pre-Employment

As a condition to an offer of employment, all individuals applying for a Safety Sensitive Position must successfully pass a Test before commencing employment with Paramount. Paramount requires all Employees transferring into Safety Sensitive Positions to successfully pass a Test before commencing work in such position.

b) Post Significant Incident or Near Miss

Employees must report a Significant Incident or Near Miss to their Supervisor or Manager immediately. Testing may be required after a Significant Incident or Near Miss as part of an investigation into the circumstances of the incident. The decision to refer an Employee for a Test will be made by the Supervisor or Manager investigating the incident after appropriate consultation and the reasons for Testing will be documented as soon as possible.

Testing will also be required as part of an investigation into a less serious incident, or potential incident if, as a result of the preliminary review, it is reasonably believed that Drug, Alcohol or Medication use may have been a contributing factor.

The following applies to Testing after a Significant Incident or Near Miss:

- i) The decision to Test an Employee must be made as soon as possible;
- ii) Arrangements for Testing should be made as soon as possible unless this is impossible because medical attention is required;
- iii) A Test will be necessary if there is no credible explanation for the Significant Incident or Near Miss or potentially dangerous situation;

- iv) Employees referred for a Test will only be those who are identified, with reasonable cause, as having been directly involved in the chain of acts or omissions leading up to the event; and
- v) Employees will be removed from duty until the investigation is complete.

#### c) Reasonable Cause

Testing will be required where there are reasonable grounds to believe, based on specific and personal observation, that the actions, appearance or conduct of an Employee while on duty are indicative of being Unfit for Duty or under the influence of Drugs or Alcohol. Examples of reasonable grounds include, but are not limited to, the following:

- i) Observed use or evidence of use of Drugs or Alcohol, such as the smell of Alcohol;
- ii) Observed signs of Drug or Alcohol use, such as lack of coordination or slurring of speech;
- iii) Erratic or atypical behaviour of an Employee consistent with Impairment;
- iv) Changes in the Employee's physical appearance consistent with Impairment; and
- v) The presence of Alcohol, Drugs, or Drug paraphernalia in the vicinity of the Employee or Paramount Premises where the Employee was present.

The decision to require an Employee to undergo a Test shall be made by a Supervisor or Manager and the reasons for the decision will be documented as soon as possible. Employees will be removed immediately from duty until the investigation is complete.

## d) Post-Violation

In those situations where employment is continued after a Policy violation, Employees will be required to pass a Test prior to returning to work and may be subject to random and unannounced follow-up Testing as a condition of continued employment, as set out in an agreement with Paramount. The duration of unannounced post-violation Testing will be determined on a case by case basis upon review of the circumstances surrounding the violation.

#### e) Post-Treatment

An Employee who returns to work following a violation of this Policy or following treatment for Drug, Alcohol or Medication dependency may be subject to random and unannounced follow-up Testing as a condition of continued employment, where such Testing forms part of the rehabilitation and support of an Employee who has been identified as having a Drug, Alcohol or Medication dependency, and as set out in an agreement with Paramount.

f) Timeframe for Post-Significant Incident, Near Miss and Reasonable Cause Testing

Specimens for Testing will be collected as soon as possible after the decision to Test is made. For Alcohol Testing, attempts to collect specimens will cease no later than 8 hours after the triggering event. For Drug and Medication Testing, attempts to collect specimens will cease no later than 32 hours after the triggering event.

## g) Testing Generally

Testing may be used to detect the following substances: amphetamines/methamphetamines, cannabinoids, cocaine, opiates, phencyclidine and Alcohol, or any other substance which may be scientifically recognized as affecting an Employee's ability to safely perform their job.

Testing will be conducted by qualified personnel and the results will be analyzed by a qualified laboratory. All health assessment information, including all Testing information, will be maintained in separate, confidential records away from the Employee's personnel file.

A failure to Test, including the failure to report promptly for a Test, refusal to submit to a Test, or refusal to agree to disclosure of a Test result to Paramount, tampering or attempted tampering with a Test sample, or failure to report an incident which may require Testing are violations of this Policy. A failure to Test will also include the inability to provide a sufficient sample to be Tested without a valid medical explanation acceptable to Paramount.

Employees who have been notified that they must report for Testing must not consume any Drugs, Alcohol or Medication until after the Test has been completed or until they have been notified by Paramount that a Test is not required. An Employee who is subject to Testing and who is taking a Medication with a current and valid doctor's prescription must notify laboratory personnel at the time of the Test. Please refer to the Policy Standards respecting Medication for more information on disclosure of Medication.

#### h) Testing Thresholds:

A positive Test result is a violation of this Policy.

#### i) Alcohol

A positive Alcohol Test result is at or above 0.04 grams per 210 litres of breath, as measured using a calibrated breath alcohol testing machine.

#### ii) Drugs

A laboratory confirmed positive Drug Test is one in which the amount of Drug or drug metabolite in the specimen identified by the Confirmation Test is at or exceeds the established cut-off levels for the program which are outlined in the following chart. The cut-off levels and panel of Drugs may be amended as necessary from time to time. The levels set out below represent levels at or above which the specimen will be reported as positive by the laboratory to a medical review officer for further assessment.

Drug or Class of Drug (Initial Test Analyte)	Initial Test Cut-off Concentration	Drug or Class of Drug (Confirmatory Test Analyte)	Confirmatory Test Cut-off Concentration
Marijuana Metabolites	50 ng/mL	THCA	15 ng/mL
Cocaine Metabolites	150 ng/mL	Benzoylecgonine	100 ng/mL
Codeine/Morphine	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000 ng/mL
Hydrocodone/ Hydromorphone	300 ng/mL	Hydrocodone Hydromorphone	100 ng/mL 100 ng/mL
Oxycodone/ Oxymorphone	100 ng/mL	Oxycodone Oxymorphone	100 ng/mL 100 ng/mL
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL
Amphetamine/ Methamphetamine	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL 250 ng/mL
MDMA/MDA	500 ng/mL	MDMA <sup>1</sup> MDA <sup>2</sup>	250 ng/mL 250 ng/mL

<sup>&</sup>lt;sup>1</sup> Methylenedioxymethamphetamine (MDMA)

The laboratory will use the cut-off concentration levels of the above chart for initial and confirmation drug tests. All cut-off concentrations are expressed in nanograms per milliliter (ng/mL)

## 10. Loss of License/Impaired Driving Charge/Suspension

If an Employee has been charged with an impaired driving-related offence or has received an administrative temporary license suspension as a result of impaired driving, then, prior to operating any Paramount vehicle or equipment, an Employee must advise their Supervisor or Manager accordingly. Impaired driving includes, but is not limited to, testing over the legal BAC in that jurisdiction, driving while impaired, refusal to blow into a breath analyzer or refusal to provide a sample for testing. This may result in temporary or permanent removal from the Employee's position or work on a without pay basis, or placement in another position, or on modified or restricted duties. This may also result in discipline up to and including

<sup>&</sup>lt;sup>2</sup> Methylenedioxyamphetamine (MDA)

termination of employment. At a minimum, the Employee will not be able to operate a Paramount vehicle or equipment until the suspension is complete and the Employee has no further restrictions on their driver's license.

## 11. Consequences of Policy Violation

In all cases, Paramount will conduct an investigation into any suspected or confirmed violation of this Policy. An Employee may be held out of service with pay while the investigation is being conducted.

When a Policy violation is found, the consequences will depend on the nature of the violation and the Employee's circumstances, and may include:

- a) Temporary or permanent removal from the Employee's position or work on a without pay basis;
- b) Placement in another position, or on modified or restricted duties;
- c) Medical assessment to determine the need for a structured treatment program;
- d) Referral to a treatment or aftercare program;
- e) Fitness for Duty assessment;
- f) Terms upon which the Employee will be permitted to return to work; and
- g) Discipline up to and including immediate termination without notice or compensation in lieu of notice.

Paramount recognizes that Drug, Alcohol and Medication dependence are treatable illnesses. Paramount also realizes that early intervention and support improve the success of rehabilitation. Employees are encouraged to seek help if they are concerned that they or a family member may have a Drug, Alcohol and/or Medication problem. Employees may request help with a Drug, Alcohol or Medication problem through their Supervisor or Manager, the People Operations department, the Health, Safety and Environment department, or EAP. To support Employees seeking assistance, Paramount encourages Employees to utilize the services of EAP to assess the seriousness of suspected Drug or Alcohol problems and identify appropriate sources of help. EAP maintains a current list of qualified community professionals who can assist with the treatment of Drug or Alcohol abuse or dependence. Information with respect to Paramount's EAP is available in Paramount's Employee Handbook available on the intranet or by contacting Paramount's People Operations department. Employees will be supported through any recommended treatment or aftercare program consistent with a substance abuse professional's recommendations and within the bounds of Paramount's benefit plan.

Accessing assistance or declaring a problem does not eliminate the requirement for maintenance of safe and acceptable performance levels and, for greater certainty, compliance with this Policy, including, without limitation, the requirement to be Fit for Duty.

## 12. Confidentiality

All information received by Paramount through this Policy is confidential. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws, including but not limited to the *Personal Information Protection Act*, and management policies.

## 13. Site Specific Standards

The requirements of this Policy may be enhanced or modified for use at specific Paramount facilities or sites or in specific Paramount business units where Paramount's management, in its sole discretion, considers that such enhanced or modified requirements are necessary or advisable, and these revised requirements will be set out in writing.

## 14. Review and Amendments

This Policy is subject to ongoing review and modifications as may be necessary from time to time.