

Workplace Substance Management Policy

Policy Overview

MedReleaf is committed to providing a safe working environment to all of our employees, contractors, temporary workers and visitors (hereinafter referred to as “Employees” for simplicity).

Employees under the influence of impairment-causing substances on the job can pose serious safety and health risks to themselves, their co-workers and the general public. The MedReleaf workplace substance management policy is intended to provide guidance to employees, supervisors and managers on the company’s regulations surrounding the use of various drugs and alcohol in the workplace as well as offsite, while employees are performing work-related functions.

Employee Expectations and Requirements

1. If you occupy a safety-sensitive position (which is defined later in this policy), you are expected to disclose the use of any substance that may cause impairment in the workplace in order to allow the company to complete an analysis of your ability to safely complete your duties.
2. Employees are not permitted to work while impaired by any substance.
3. Employees who are experiencing substance abuse challenges are required to disclose these challenges to a member of the HR team immediately in order to allow the company to initiate the accommodation analysis process.
4. In order to help preserve a safe and healthy workplace, MedReleaf prohibits certain substances from being brought on to company property or being consumed on company property. Unless otherwise addressed in this policy, the following items are prohibited from being present on company property: non-prescription (or non-medically-authorized) drugs or medication, including but not limited to cannabis, and alcohol.

The consumption of legal, impairment-causing substances (such as alcohol) may be permitted, from time to time, at work events or as specifically approved by an employee’s direct supervisor. Employees are expected to exercise reasonable professional judgement when consuming impairment-causing substances at all work-related events. Employees are required to abide by all company policies when performing work-related functions onsite or off-site. MedReleaf prohibits the use of non-prescription (or non-medically-authorized) drugs in the workplace.

Please note that employees are prohibited from working while impaired by any substance.

MedReleaf is equally committed to accommodating, up to the point of undue hardship, any employee who is required to use prescription drugs or medications as well as any employee with a substance abuse issue. MedReleaf acknowledges that drug and alcohol dependencies are protected and recognized as a disability under human rights legislation, and therefore considered to be prohibited grounds of discrimination.

Please note the requirements for employees in a safety-sensitive position differ from other employees (see section 2 for clarification). In addition, employees are required to report any safety risks in the workplace; including their own impairment. If an employee is unsure of whether or not a safety risk exists at a given time, they are required to consult with a member of the HR team member to initiate a risk assessment.

Both medical and recreational cannabis are covered by this policy, under different substance classifications. For the purposes of commenting on impairment and or risk, Cannabis products will be identified with one of the 4 descriptors:

- 1) medical cannabis (THC),
 - a. medically-authorized cannabis products containing significant amounts of THC
- 2) medical cannabis (CBD),
 - a. medically-authorized CBD-based cannabis products that do not impair the employee
- 3) recreational cannabis (THC) and;
 - a. legally acquired, recreational cannabis products containing significant amounts of THC
- 4) recreational cannabis (CBD).
 - a. Legally acquired CBD-based cannabis products that do not impair the employee

If an employee wishes to discuss this policy further, or if any additional information is required, please contact a member of the HR team via email, by phone or in-person.

Policy Details

1) Accommodation

- a. The company will accommodate, to the point of undue hardship, employees who experience drug or alcohol dependency issues or employees taking prescription drugs or medically-authorized substances (including medical cannabis).
 - i. Employees are encouraged to disclose a substance dependency or substance abuse issue to the company immediately.
 - ii. Provided employees in non-safety-sensitive positions are not impaired while at work, they are not required to disclose the use of any impairment-causing substance used for medical purposes.
- b. Employees will not be negatively impacted if they disclose a drug or alcohol dependency issue. The company will work with the employee, the employee's treating physician or medical advisor to devise an individualized treatment and accommodation plan as well as an individual risk assessment.
- c. If an employee discloses a drug or alcohol dependency issue after they have violated a company policy, acted in a manner that constitutes misconduct or gross misconduct, or acted in a manner that is negligent, they will be subject to disciplinary action, up to and including termination, for the behavior or misconduct alone, not the dependency issue.
- d. The process of accommodating individuals is a shared obligation of the company and the employee:
 - i. It is the responsibility of the employee requiring accommodation to make the accommodation request to a member of the HR team, in-writing.
 - ii. The company will initiate the consultative accommodation analysis process promptly after receiving the employee's request.
- e. To request accommodation or disclose a substance abuse or dependency issue, please notify a member of the HR team via email.
- f. Please consult with the MedReleaf Accommodation Policy to better understand the company's position on accommodating employees.

2) Safety Sensitive Positions

- a. A safety-sensitive position is one in which incapacity due to a drug or medication (prescription, non-prescription, medically-authorized or non-medically-authorized) or alcohol impairment could result in direct and significant risk of injury to the employee, others, or the environment, or could result in a threat to general public safety. If you are unsure of whether or not you occupy a safety-sensitive position, please consult with a member of the HR team for clarification.
 - i. Examples of safety-sensitive positions include, but are not limited to: forklift drivers, heavy machinery operators, people working at heights, truck drivers, etc.
- b. Any employee in a safety-sensitive position should notify their direct supervisor or a member of the HR team if they are scheduled to work, but may be impaired by drugs or alcohol in or to ensure a proper risk-assessment is completed.
- c. Employees in safety-sensitive positions must disclose the use of any drugs or medication that could cause impairment, including but not limited to: medical cannabis, sleep-aids, codeine, etc. before undertaking safety-sensitive job functions.
 - i. The company may request appropriate information from a physician to ensure the safety-sensitive employee is able to discharge their duties in a safe manner. Employees acknowledge that this is a key step in the accommodation process and is important to maintain a safe workplace. To this end, Employees agree to fully cooperate with the company and any advising physician.

3) Driving while impaired by drugs / medication (prescription or non-prescription) and/or alcohol

- a. It is illegal to operate a motor vehicle (for work purposes or non-work purposes) while impaired by medication, drugs (prescription or non-prescription) or alcohol.
- b. The company will take all possible steps to prevent impaired driving, including but not limited to: paying for employees to take public transit or a taxi home after work or a work event.
- c. Please notify your immediate supervisor or the director of HR if you require any assistance in arranging safe transportation after any work-related activity.

4) Prescription drug / medication use (including medical cannabis)

- a. Employees who do not occupy a safety-sensitive position are not required to disclose prescription drug or medication use to the company (including medical cannabis) provided those Employees remain free from any impairment while at work.
- b. If an employee feels that their use of prescription drugs could impact performance, prevent them from completing their job functions, prevent them from complying with company policies, or create a safety hazard in the workplace, they are required to disclose their prescription drug use to a member of the HR team in order to allow the company to conduct an accommodation analysis.

5) Substance abuse issues and addiction

- a. Any employee who is struggling with substance abuse/addiction challenges will be supported and accommodated by the company. The company accommodation policy applies to substance abuse issues and addiction.
- b. Employees who are struggling with substance abuse or have a dependency are required to notify a member of the HR team promptly in order to allow the company to prevent risk, conduct an accommodation analysis and to coordinate support for the employee.

- i. The company will accommodate addiction and substance abuse challenges up to the point of undue hardship.
- ii. Employees must notify a member of the HR team of substance abuse or addiction issues prior to engaging in any safety-sensitive work activities.
- iii. If an employee discloses a drug or alcohol dependency issue after they have violated a company policy, acted in a manner that constitutes misconduct or gross misconduct, or acts in a manner that is negligent, they will be subject to disciplinary action for the behavior or misconduct alone, not the dependency issue.

6) Drug testing

- a. The company will only complete drug or alcohol testing for employees in safety-sensitive positions.
- b. The company may complete drug or alcohol testing under the following conditions:
 - i. When the company has grounds to reasonably suspect that an employee is impaired by drugs or alcohol.
 - ii. After a “near miss” safety incident.
 - iii. After a safety incident.
 - iv. As part of a rehabilitation program.
- c. Any drug or alcohol testing which is performed under this Policy will be conducted by an outside service provider or other medical professional with specific training related to workplace drug or alcohol testing.

7) Zero tolerance

- a. The company will not tolerate any unsafe behaviour or negligence in the workplace, including impairment in the workplace.

8) Consequences and Discipline

- a. Employees who fail to comply with this policy or who engage in illegal activities such as distributing or selling drugs and/or alcohol while on company premises will be subject to disciplinary action up to and including the termination of their employment with cause.

If any clarification or additional information is required, please contact a member of the HR team.

Please see the attached chart to provide further direction on policy compliance. Please note that this chart is a guide and is non-exhaustive.

Note this document does not intend to provide any specific or legal advice. Employers may want to consult legal counsel on specific issues.

Substance classification	Permitted on company property	Accommodation guidelines	Permitted use while working	Disclosure requirements
<p>legal, non-medical substances that cause impairment</p> <p>EX: alcohol, recreational cannabis (THC)</p>	No	<p>Employee is required to request accommodation if required.</p> <p>Accommodation, to the point of undue hardship, will be provided by the company.</p>	<p>No employee can be impaired while working.</p> <p>Only permitted at company-sanctioned social events, with authorization from direct supervisor.</p>	<p>All employees are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p> <p>Employees in safety-sensitive positions must disclose possible impairment before undertaking safety-sensitive tasks.</p>
<p>illegal, non-medical substances that cause impairment</p> <p>EX: cocaine</p>	No	<p>Employee is required to request accommodation if required.</p> <p>Accommodation, to the point of undue hardship, will be provided by the company.</p>	No. No employee can be impaired while working.	<p>All employees are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p> <p>Employees in safety-sensitive positions must disclose possible impairment before undertaking safety-sensitive tasks.</p>
<p>Medically-authorized substances that cause impairment</p> <p>EX: medical cannabis (THC), codeine</p>	<p>Yes.</p> <p>For safety-sensitive workers, supervisor is notified prior to substance being brought on site.</p>	<p>Employee is required to request accommodation if required.</p> <p>Accommodation, to the point of undue hardship, will be provided by the company.</p>	No. No employee can be impaired while working.	<p>Employees in safety-sensitive positions must disclose possible impairment before undertaking safety-sensitive tasks.</p> <p>Employees who are not in safety-sensitive positions are not required to disclose out-of-work use, provided they are not impaired at work.</p> <p>All employees are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p>
<p>prescription substances that cause impairment, used illegally</p> <p>EX: Percocet</p>	No	<p>Employee is required to request accommodation if required.</p> <p>Accommodation, to the point of undue hardship, will be provided by the company.</p>	No. No employee can be impaired while working.	<p>All employees are required to disclose dependency issues, to allow for a support plan to be created and to allow for accommodation analysis to occur.</p> <p>Employees in safety-sensitive positions must disclose possible impairment before undertaking safety-sensitive tasks.</p>