



Summary of

ALCOHOL AND DRUG-FREE WORKPLACE PROGRAM

January 2019

Introduction

Red Lake Gold Mines is committed to the safety of the public and to maintaining safe and healthy working conditions for all of its employees and contractors. The Company is also committed to complying with its obligation under the *Occupational Health and Safety Act* and Regulations for *Mines and Mining Plants* under that Act to provide a safe work environment. The Company's Alcohol and Drug-Free Workplace Program (the "Program") has been implemented to support our commitment and to meet our responsibilities.

Why Does the Company Conduct Alcohol and Drug Testing?

The Company is committed to maintaining a safe and healthy workplace and is concerned about the personal welfare of its employees. Working with someone or coming into contact with someone who is impaired on the job by the effects of stress, fatigue, or by the influence of alcohol or drugs can pose serious health and safety risks to you.

The Company has put a lot of hard work into developing this Program and making sure that it is administered fairly. This Program is necessary to discourage and prevent people from working while impaired by the effects of alcohol or drugs.

Where Do I Find the Complete Program?

This brochure contains some key information, but it is only a summary of the Company's complete Program. At any time, you should feel free to review a complete copy of the Program which is available on Conveyor, at the gatehouses, in the Human Resources Department, in the nursing stations and in the Safety and Training office.

Who Does the Program Apply To?

The Program applies to all employees of the Company as well as to all employees of contractors hired by the Company, as if they were employees of the Company.

However, not all employees will be subject to every type of alcohol and drug testing, as explained below.

Basic Responsibilities of Employees

1. Ensure that you are in a fit state to work at the start of and throughout each shift.
 2. Perform your job safely and in accordance with Company practices, standards, and policies.
 3. Notify your Manager or Supervisor if you are concerned about your fitness for work for any reason, including the effects of fatigue, stress, prescription drugs, alcohol or illegal drugs.
 4. Report your use of any prescription drugs to the Occupational Health Nurse.
 5. Report to your Manager or Supervisor any violation of the *Occupational Health and Safety Act* or regulations, or the existence of any hazard of which you are aware.
 6. Notify your Manager or Supervisor and the Occupational Health Nurse of any situation in which this Program may have been breached, including any situation in which other people may be unfit for work or the unauthorized possession or consumption of alcohol or drugs by another person.
- * The source of all such information will be dealt with in confidence and will be disclosed only if required by law.*
7. If you require accommodation in order to perform the essential duties of your job, you must communicate your need for accommodation in sufficient detail to the Company and cooperate in the accommodation process.

Employee Disclosure

You are encouraged to come forward to request assistance before drug or alcohol problems affect your performance. When you come forward with a substance problem, your decision to seek assistance will not become part of your personnel file and will not be used as a basis for disciplinary action or in any disciplinary proceedings. You will be referred

to an appropriate drug and/or alcohol rehabilitation program. You will be subject to confidential Return-to-Duty and Follow-Up testing as and when directed by a Substance Abuse Professional (SAP).

Who Oversees the Program?

- **Occupational Health Nurses (OHNs)** → Nurses employed by the Company who are responsible for collecting samples for alcohol and drug testing, communicating with employees about the Program, providing support to employees, working with the Service Agent for the purposes of administering alcohol and drug testing, and working with community support services on behalf of employees.
- **Designated Employer Representatives (DERs)** → This group includes Company Supervisors, Managers, senior Security Guards and Occupational Health Nurses. The DERs are authorized by the company to collect samples for alcohol and drug testing, to make decisions in the testing and evaluation processes, and to take immediate action to remove impaired employees from safety-sensitive duties.
- **Contact Group** → This group includes the General Manager, Human Resources Manager and Safety & Training Manager and is responsible for overseeing the Program. One of the three individuals listed above must be contacted and must approve Post-Accident or Reasonable Cause testing before this testing may be conducted.
- **Service Agent** → An external organization that performs administrative tasks for the Program.
- **Medical Review Officer (MRO)** → A licensed medical doctor who has the knowledge necessary to review drug test results. The MRO will review and evaluate all confirmed positive drug tests and will communicate the results of drug tests to the affected employee. The MRO will also report, if appropriate, a confirmed

positive drug test to the Occupational Health Nurse.

- **Substance Abuse Professional (SAP)** → A person who consults with employees who have tested positive, and who can determine whether or not a person requires treatment for an alcohol or drug dependency or addiction problem by using tools which are accepted in the addictions field.

Confidentiality

The Company assures you that the Program will be administered in the strictest of confidence. The results of all alcohol and drug tests will be kept only in two places: in a separate, secure, confidential file maintained by the Company's Occupational Health Nurses, and also offsite with the Service Agent. If you must temporarily leave work or be transferred to alternative duties because of a positive alcohol or drug test, your Supervisor will be told only that you are absent for a medical reason and will be told nothing further.

How Will Alcohol Testing Be Conducted?

Alcohol testing will be conducted by breathalyzer by a trained Breath Alcohol Technician (BAT).



How Will Drug Testing Be Conducted?

Drug testing will be conducted by an oral swab. There are two types of oral swabs: instant-result and laboratory-confirmed. Both types will be used for Reasonable Cause, Follow-Up, Post-Accident and Return-to-Duty drug tests. All laboratory-confirmed saliva/oral samples will be collected, analyzed and interpreted by certified professionals.



Why Does the Company Use Saliva/Oral Samples Instead of Urine Samples for Drug Testing?

The saliva/oral test is technology aimed at determining whether an employee is impaired by drugs at the time the employee takes the test, instead of determining whether drugs are present in an employee's body.

Types of Alcohol and Drug Testing

1. Post-Accident

When investigating an accident, the Company may require that you take a Post-Accident alcohol and drug test, which will be required only if your actions could have contributed to the accident. This type of alcohol and drug testing may be required even if there is no evidence or suspicion that you were impaired by alcohol or drugs at the time of the accident. It may also be required in "near miss" situations if a serious accident could have resulted. A member of the Contact Group must approve Post-Accident alcohol and drug testing.

2. Reasonable Cause

You may be asked to take a Reasonable Cause alcohol and drug test when the Company thinks there are reasonable facts to believe that you may be unfit for work due to impairment from alcohol or drugs.

Before collection of a breath and saliva/oral sample for Reasonable Cause testing, two Supervisors (or one if a second supervisor is not immediately available) must complete a Reasonable Cause Observation Checklist and a member of the Contact Group must approve the testing.

3. Pre-Access

Pre-Access alcohol and drug testing will be conducted after a conditional job offer is extended to, and accepted by, a successful applicant.

4. Random

Random drug and alcohol testing will annually test up to 50% of all employees who are eligible for such testing. The random selection

will be determined by computer program and testing will be unannounced.

5. Return-to-Duty

If you are temporarily released from duty as a result of a positive alcohol or drug test, or if you complete an alcohol or drug assessment/rehabilitation program, a negative breath and saliva/oral sample will be required prior to your return to work.

6. Follow-Up

If you have tested positive to either an alcohol or drug test, or if you completed an alcohol or drug assessment/rehabilitation program as recommended by an SAP, you will be subject to Follow-Up testing to ensure compliance with the Program.

Which Types of Alcohol and Drug Testing Will Apply To Me?

Pre-Access, Post-Accident, Reasonable Cause, Return-to-Duty, and Follow-Up alcohol and drug testing apply to all employees of the Company.

Random alcohol and drug testing apply only to employees who hold safety-sensitive positions. A list of the Company's safety-sensitive positions is maintained by the Safety Department. The Company will determine whether any other positions are safety-sensitive by using the criteria set out in Section 1.5 of the complete Program.

What Will be Considered a Positive Alcohol or Drug Test?

1. Alcohol Test

Breath alcohol levels of 0.05% or greater will be considered a positive test.

2. Drug Test

A positive drug test means that the level of drugs in a saliva/oral sample is over the cut-off level established by the Company on the advice of an outside expert.

3. Refusal to be Tested

You should be aware that a refusal to be tested for alcohol or drugs will be considered, treated

as, and will have the same consequences as a positive test result. Examples of refusals include:

- (i) If you inform the DER that you are unable to provide an adequate breath or saliva/oral sample and without a valid medical explanation;
- (ii) If you fail to take an alcohol or drug test within the required timeframe; or
- (iii) If you engage in any conduct that obstructs the testing.

A refusal to comply with testing or a medical evaluation may result in discipline, up to and including termination of employment.

4. Tampering with an Alcohol or Drug Sample

Any employee who tampers with or attempts to alter an alcohol or drug sample collected for testing under this Program will be considered to have refused to be tested and will be subject to discipline.

What is the Procedure for Alcohol and Drug Testing?

Procedures may vary slightly depending on the type of alcohol and drug testing, therefore, you are encouraged to review the full Program. However, the following is a general summary of the procedure involved:

1. Collection of Samples

The Company's Occupational Health Nurse or its DERs who are trained in the proper collection methods, will collect the breath and saliva/oral samples from you.

2. Evaluation of Samples

Alcohol Testing – Breath samples will be quickly analyzed on site by the Company's Occupational Health Nurse or its DERs after you have taken the test. If your first test result is 0.02% or higher, a second (confirmation) test will be performed.

All breath-alcohol test results will be recorded and the data will be forwarded to the Company's Service Agent.

Drug Testing – Instant-result oral tests will be administered by the Occupational Health Nurse or DER. For laboratory-confirmed oral swab tests, the saliva/oral samples will be sent by courier to a certified laboratory. The laboratory will confidentially process all laboratory-confirmed samples in accordance with the appropriate cut off levels.

3. Communication of Results

Alcohol Testing – You will be immediately told of the results of the breathalyzer test by the person administering the test.

Drug Testing – The MRO will evaluate all laboratory-confirmed positive drug tests and will attempt to contact you if the test result is positive to discuss the results of the test. After that discussion and once the MRO has evaluated all the relevant circumstances, the MRO or his or her staff will communicate any laboratory-confirmed positive drug test result by phone to the Company's Occupational Health Nurse.

What Will Happen to Me if I Test Positive for Alcohol or Drugs?

Employees who initially test positive for drugs and/or alcohol will be suspended immediately and referred to an SAP. If the SAP deems the employee to be only a recreational user of drugs or alcohol, the employee will be terminated immediately for just cause. However, if the SAP deems that the employee has an addiction issue and recommends that the employee attend counselling sessions or participate in a treatment or rehabilitation program, the employee will be suspended until completion of the recommendations and a negative Return-to-Duty test is obtained. However, a second positive test will result in immediate dismissal for just cause.

Alcohol Testing – An initial confirmation test equal to 0.02%-0.049% will require that you be removed from duty for 24 hours or until a breath test result is below 0.02%. The

Company reserves the right to impose discipline and additional requirements on employees who have a confirmation test between 0.02% - 0.049%, including the requirement that the employee undergo an evaluation by a Substance Abuse Professional.

Drug Testing – If you fail the initial instant-result saliva/oral swab drug test, the Company will release you from duty and you will be required to undergo an evaluation by a Substance Abuse Professional. You will not be allowed to drive yourself home from the workplace. In such circumstances, the Company will provide transportation home. A ‘negative Return to Duty’ drug test will be required prior to your return to work. However, a second positive test result will result in your immediate termination for just cause.

If you failed the instant-result test, then if the result of the laboratory-confirmed test comes back negative (pass), the positive instant-result test will be disregarded and you will be permitted to return to work.

Therefore, if you test positive for alcohol or drugs, or if you refuse to be tested, you must:

- (i) sign the appropriate Company forms;
- (ii) undergo an evaluation by a designated SAP; and
- (iii) complete any treatment program the SAP recommends prior to returning to work.

If you must be off work to complete a treatment program, your supervisor will be notified by the Occupational Health Nurse that you will be off work for medical reasons. No further explanation will be given.

If you require a period of time off in order to a complete rehabilitation program, you may be eligible for short-term disability benefits.

After you successfully complete your assessment or treatment, you must take a Return-to-Duty alcohol and drug test prior to returning to regular duties, and will be subject

to Follow-Up testing after you return to work. If the results of those tests are negative, you may return to your regular duties, but you will be subject to Follow-Up testing over the next 24 months from the time of your return to work. However, a second positive test result will result in your immediate termination for just cause.

Company’s Commitment to Training and Education on Alcohol and Drug Issues

The Company’s senior management will ensure that Managers and Supervisors who are responsible for implementing this Program are provided with education and training on issues related to alcohol and drug use and impairment.

All new employees to the Company will be trained on the Program.

Also, the Company’s senior management team will ensure that the following alternate methods of dealing with drug and alcohol use in the workplace continue to be in effect:

- The Company has an Employee and Family Assistance Program (EFAP) that provides employees with confidential counselling. The Company is not provided with the name of any individual who has used the services of the EFAP;
- A health promotion bulletin will be circulated through various Company’s communication methods which, from time to time, will address alcohol and drug use issues; and
- Health and wellness posters and notices will be posted on the Company bulletin board which will include information on alcohol and drug use issues.

Questions?

If you have further questions about the Company’s Program or the contents of this brochure, please contact the Safety and Training Manager or Human Resources Manager.