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	Revised Date: 2018/10/17
	Approved: 2018/10/04

1. PURPOSE

Greyhound Canada Transportation ULC (GCTU) is committed to the health and safety of its employees, its customers and the communities in and through which it conducts its business. The Company will pursue every feasible effort to minimize the risks associated with its operations in order to ensure a safe, healthy and productive operation, recognizing that continued success will depend on all stakeholders working together to meet this goal. To this end, the use of illicit drugs, alcohol and medications can negatively affect an individual's ability to perform their duties and can have a serious negative impact on the health and safety of themselves and others.

The objective of the policy is to provide standards and guidelines that affirm our commitment to minimize risk associated with our operations by providing a safe and healthy workplace which is free of any negative effects associated with alcohol or other drug use. It is one more component of our overall commitment to health and safety.

This policy is designed to meet U.S Department of Transportation rule, 49 CFR Part 40, which describes required procedures for conducting workplace drug and alcohol testing for the federally regulated transportation industry.

2. SCOPE AND APPLICATION

The following provisions are effective October 17, 2018 and supersede all previous versions of the policy. They apply to all employees while they are engaged in company business, working on company premises or worksites, and when operating company vehicles and equipment. Violations of these provisions are grounds for disciplinary action that is defined as any action up to and including termination of employment or affiliation with GCTU. Furthermore, such violations will be assessed on an individual basis in regard to any requisite accommodation. Because of the greater risk involved in performing certain functions, some positions have been designated as "safety-sensitive" and some as "risk-sensitive". Individuals holding these positions will be expected to meet higher standards as outlined in the policy.

All contractors will be advised of the applicable provisions of this policy and will be expected to enforce these requirements for their employees, sub-contractors and agents. Any contravention will be considered a breach of their contract.

Details on the standards and procedures, and definitions of terms are found in the following sections of this policy. All employees are required to read and understand this policy and their responsibilities under it. Any questions on policy details, interpretation or implementation provisions should be referred to the Alcohol and Drug Program Administrator. This policy is subject to ongoing review, and modifications will be made as deemed necessary to respond to current circumstances and evolving needs.

3. DEFINITIONS

- **Alcohol and Drug Program Administrator** refers to the person in the Human Resources team in charge of administrating the alcohol and drug testing program.

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- **Company Business** refers to all business activities related to company operations whether conducted on or off of company premises. It includes those situations where an individual is representing or could reasonably be perceived as representing GCTU in the performance of official duties.
- **Company Premises** includes but is not necessarily restricted to all land, property, structures, installations, vehicles, and equipment owned, leased, operated or in any other manner being used by the company for the business purpose of the company.
- **Company Worksite** includes all premises where a Greyhound employee is performing work on behalf of the company.
- **Contractor** refers to all active suppliers contracted or engaged to provide services to Greyhound and any affiliates, including Commissioned Agents.
- **Driver** means any person who operates a commercial motor vehicle and is employed by or operating on behalf of the company.
- **Drug** means any substance, including alcohol, illicit drugs, medications, solvents or inhalants, the use of which can negatively change or affect the way a person thinks, feels or acts. Of concern are those that inhibit a worker's ability to perform his or her job safely and productively.

Illicit Drug means any substance that is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as cocaine).

Alcohol refers to the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols, including methyl and isopropyl alcohol.

Beverage Alcohol refers to beer, wine and distilled spirits.

Medication refers to a drug obtained legally, either over-the-counter or through a doctor's prescription. These can include mind altering drugs such as prescribed medical marijuana, OxyContin, Dilaudid etc.

- **Employee** includes any person on Company payroll.
- **Fitness for Work/Duty**, in the context of this policy, means being able to safely and acceptably perform assigned duties without limitations due to the use or after-effects of alcohol, illicit drugs or medications.
- **On Duty Time** is defined as all-time from the time an individual reports for duty, begins to work or is required to be in readiness to work until the time the individual is relieved from work. In the event an individual is to be tested for alcohol and/or drugs, on duty time also includes time spent for the testing process including time spent waiting for the test.

In addition to the above, for drivers, on duty time includes all time spent driving, service time, inspecting the vehicle, loading or unloading, and all time waiting to load or unload or to leave on a trip, unless the driver has been specifically relieved of duty.

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- **Safety-Sensitive Positions** are those where the duties or responsibilities of the position, if improperly exercised, could reasonably be expected to result in a serious collision or other incident affecting the health or safety of employees, contractors, customers, the public, the environment, or causing significant property damage. In addition, employees holding positions in this category have either no direct or limited personal contact, with their supervisor in regard to the provision of frequent operational checks. This definition includes all employees who are required to rotate through or regularly relieve in safety-sensitive positions.

For purposes of this policy, all motor coach operators, including regular, spareboard and extra-board operators are considered to hold a safety-sensitive position.

- **Risk-Sensitive Positions** are those where the duties or responsibilities of the position, if improperly exercised, could reasonably be expected to result in a serious collision or other incident affecting the health or safety of employees, contractors, customers, the public, the environment, or causing significant property damage. This definition includes all employees who are required to rotate through or regularly relieve in risk-sensitive positions. For purposes of this policy, the pool of risk-sensitive positions includes the following:
 - All Forklift Operators
 - Shuttle Truck Drivers
 - All Maintenance employees who are required to repair and/or operate a motor coach either as part of their regular duties or from time to time
 - Platform Loaders
 - Express Clerks
- **Supervisor** means the individual in authority over a particular area or shift, including managers, team leaders, and others in such types of positions.


4. POLICY STANDARDS

To minimize the risk of unsafe and unsatisfactory performance due to the issue of alcohol or other drugs, employees are required to report fit for duty and remain fit when on Company business, premises, or worksites, including all on duty time. Specifically, in these circumstances employees are required to meet the following standards.

4.1 Illicit Drugs

The following are prohibited while on Company business, premises and worksites:

- use, possession, distribution, offering or sale of illicit drugs or drug paraphernalia for the use of illicit drugs, or conspiracy or participation in any of these activities;
- possession of prescribed medications (not in the original container) without a legally obtained prescription, and distribution, offering or sale of prescription medications (trafficking);
- being on duty under the influence of illicit drugs; and
- presence in the body of illicit drugs as determined through the testing program.

	
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4.2 Alcohol

For all employees, presence in the body of alcohol at or above the established cut-off level of 0.04 blood alcohol content (BAC) is prohibited. In addition, the following standards apply.

4.2.1 Company Premises

The use, distribution, offering or sale of alcoholic beverages or the possession of open containers of beverage alcohol on company premises is prohibited. Exemptions to the general policy regarding alcohol on company premises may be made for approved social functions and other exemptions authorized by the Senior Vice President Canada or designate.

4.2.2 Company Business

All employees are prohibited from reporting for work under the influence of alcohol, from using beverage alcohol during the workday including during meals and breaks, and from using alcohol within eight hours after a collision or other incident until they are tested within that period or advised a test is not required.

In addition to the above, individuals holding *safety-sensitive* or *risk-sensitive positions* cannot possess beverage alcohol when on duty unless it is manifest in a shipment or possessed or transported by passengers. They will be removed from duty for at least 24 hours if they have an alcohol test result of 0.02-0.039 BAC and will be subject to disciplinary action.

Individuals holding a *safety-sensitive position* are prohibited from using alcohol within eight hours prior to reporting for duty.

When on company business, employees are expected to act in a responsible manner that upholds their good reputation and that of the Company. The use of alcohol by employees while on company business after standard work hours is permitted (e.g. conferences, training sessions, when on travel status, specially approved social events etc.), however, it must not have, or be seen to have, a negative impact on the employee or the company.

4.3 Medications

Employees are expected to responsibly use prescribed and over-the-counter medications. The intentional misuse of a medication (e.g. using a medication not as it has been prescribed, using someone else's prescription medication, combining medication and alcohol use against direction) while on company business or premises is prohibited. Medications of concern are those that inhibit or may inhibit an employee's ability to perform their job safely and productively (Refer to Appendix I for guidelines on reporting of Medications).

Employees are expected to manage potential impairment during working hours due to the legitimate use of medications by contacting their personal physician to determine if the medication can have a negative effect on performance and taking appropriate action under the circumstances. GCTU will take reasonable steps to accommodate any need for modified work as a result of medication use.



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- Employees in *safety-sensitive* and *risk-sensitive* positions must have a medical opinion from their licensed medical practitioner or a completed FAF stating that the medication they are using will not affect their ability to operate safely, and are required to report any medications that cause any type of mental or physical impairment to the Alcohol and Drug Program Administrator. If the employee's licensed medical practitioner has identified potential effect to the ability to operate safely, the Alcohol and Drug Program Administrator will consult Greyhound's medical advisor which will provide the limitations and restrictions to the Human Resources to pursue with the accommodation process. The employee is required to abide by any recommended course of action to minimize safety risks; and
- All other employees are encouraged to notify the Alcohol and Drug Program Administrator if they are advised a medication they are taking can affect safe operations, and abide by any course of action recommended by the attending physician to minimize safety risks. Dependent on safety risks, the employee may be required to apply for accommodation.

GCTU reserves the right to confirm with the individual's physician on a confidential basis through the, Alcohol and Drug Program Administrator the nature and duration of any required accommodation.

4.4 Unexpected Call In

If an employee is called to come to work for unscheduled/unexpected overtime or an emergency situation he/she must inform or notify the caller/requester, at the time of the call, that he/she is under the influence (of alcohol, drugs or medications) and is unfit to report to work. It is the employee's responsibility to divulge the information right away and not come to work under the influence.

5. PROCEDURES


5.1 Prevention, Assessment/Rehabilitation & Aftercare

Prevention: The Company will make information available on health and safety issues, recognizing related performance concerns and the process to access assistance.

Assessment/Rehabilitation: Employees with an alcohol or drug/medication problem are expected to access assistance before it impacts their work performance. Declaring a problem does not remove an employee from testing or discipline under this policy. Employees who voluntarily request help will be provided with confidential assessment, counseling, referral, and aftercare services through the company's employee assistance program. Full participation in the program and rehabilitation activities is required as is maintenance of satisfactory performance levels.

Where in the opinion of the medical or EAP professional there is a risk that would prevent an employee from doing their job safely, they may issue a directive regarding work limitations until the employee is considered able to safely resume their regular duties.

Aftercare: All employees who complete primary treatment (e.g. residential or out-patient

	
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treatment) for alcohol and/or drug problems as a result of a voluntary or formal referral will be encouraged to participate in a structured aftercare program in order to help them maintain recovery. The costs of treatment and aftercare provisions are covered in accordance with the benefits plan and/or provincial health care plans.

The Alcohol and Drug Program Administrator in consultation with the employee and any other appropriate individuals, will determine the appropriate aftercare arrangements on an individual basis. In all cases, a written agreement with the employee will outline the conditions governing the return to the job, and the consequences for failing to meet those conditions.

Confidentiality: will be maintained except where limited disclosure is necessary for related health and safety concerns and then only in compliance with relevant legislation. That is, only the information strictly limited to the level of functional ability (e.g. fitness for work and any restrictions that may apply) may be shared with management for purposes of determining fitness for work, appropriate work accommodation and/or work re-entry initiatives. Specific medical details concerning the individual's diagnosis, treatment, and prognosis are confidential and under the custody of the Alcohol and Drug Program Administrator and cannot be released without written informed consent from the employee.

5.2 Social Events


In the case of any company social event, appropriate regard will be taken for the safety and wellbeing of the individuals present and the community. Responsible alcohol use is permitted at off-site social functions with the prior approval of the relevant Department Head, provided that the basic policy standards are observed (e.g. no use if returning to the job), alcohol consumption is controlled so that there is no inappropriate behavior at the function or potential for impaired driving afterwards, and alternative transportation arrangements are made available. Additional guidelines for hosting events are found in Appendix II.

Business Hosting: If alcohol is made available to GCTU guests in the course of conducting business (e.g. restaurant meetings), employees are expected to use judgment and be responsible in hosting others. They should ensure, in particular, that the guest does not leave the facility in an unfit state, and provide alternative transportation arrangements as appropriate.

5.3 Impaired Driving

Any employee with the care and control of a company vehicle or when driving on company business who receives an impaired driving charge must report the situation to his supervisor within 24 hours and will be removed from driving duties. This would include a charge under the *Criminal Code* or sanction or citation under the legislation of that jurisdiction for an impaired driving offence (including but not restricted to blowing over the legal BAC, driving while impaired, or refusal to blow into a breath analyzer).

Receipt of a charge will result in a full investigation, and a range of actions, which can include alternate work, assessment for an addiction problem or discipline up to, and including termination of employment depending on the circumstances. Those individuals who hold a safety-sensitive position will be referred for assessment by a Substance Abuse Professional (SAP) whether or not their employment is continued, and will be subject to return to duty and follow up testing in any continuing employment agreement with GCTU. Failure to report receipt of a charge in this situation

	
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will be grounds for disciplinary action.

5.4 Possession of Alcohol or Drugs

GCTU reserves the right to investigate when there are reasonable grounds to believe drugs, drug paraphernalia, or alcohol containers are present on company owned and controlled premises, including mobile equipment or vehicles in violation of this policy. The decision to conduct an investigation will be made by company management in accordance with applicable laws, agreements and local practices, and will be undertaken in co-operation with appropriate law enforcement agencies where required. Prescription medications including medicinal marijuana must be kept in their original container upon issuance and the medical documentation (official physician prescription) specifying the amount allowed to possess must be provided to the Alcohol and Drug Program Administrator.

5.5 Unfit for Duty Situations

In all situations when there are grounds to believe an individual is unfit to be on the worksite, he/she will be escorted from the immediate work area, to an appropriate location for further investigation. The Alcohol and Drug Program Administrator and the individual's supervisor will be notified. The employee will be given an opportunity to explain the situation. If the supervisor conducting the investigation still believes the individual is in a condition unfit for normal duty, they may take any of the following actions appropriate under the circumstances:

- Referral for medical attention and provided with transportation/escort to a clinic or hospital; or
- Referral for an alcohol and drug test, and provided with transportation/escort to the collection site; and in each case
- Provided with transportation to their place of residence or under the care of another person.

The basis for the supervisor's decision in each case will be documented as soon as possible after action has taken place. Managers will use discretion when escorting an employee from the workplace and will attempt to privately and unobtrusively maintain the dignity of the employee.


At the supervisor's discretion, where there are reasonable grounds to believe a policy violation has occurred, any employee may be temporarily held out of service pending medical determination of fitness for duty and completion of an investigation into a possible violation of this policy.

5.6 Alcohol and Drug Testing (See Appendix III for Alcohol & Drug Testing Procedures)

All Employees are subject to testing for alcohol and designated drugs under the following circumstances:

5.6.1 Reasonable Cause:

Testing will take place when there are reasonable grounds to believe that the actions, appearance or conduct of an individual while on duty are indicative of the use of drugs or alcohol in violation of this policy. The decision to test shall be made by a trained supervisor or manager, with concurrence of a second person (e.g. an occupational health professional, another supervisor, the Program Administrator, or any other appropriate person) wherever possible. In those situations, where the supervisor has not received the applicable training, a second opinion will be required.

	
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The decision to refer someone for a test will be based on specific, personal and documented observations resulting from, but not limited to:

- observed use or evidence of use of a substance (e.g. smell of alcohol);
- erratic or atypical behavior of the employee;
- changes in the physical appearance of the employee;
- changes in behavior of the employee; and/or
- changes in the speech patterns of the employee.

5.6.2 Post Incident:

Testing will take place after a work-related collision or other incident as part of a full investigation into the circumstances. The decision to refer an employee for a test will be made by the supervisor investigating the situation with concurrence of a second person (e.g. an occupational health professional, another supervisor, the Program Administrator, or any other appropriate person) wherever possible. The following procedures apply:

- the need for a test must be documented as part of the preliminary investigation as soon as practical after the triggering event;
- a test will not be necessary if there is clear evidence that the acts or omissions of employees could not have been a contributing factor (e.g. structural or mechanical failure);
- employees referred for a test will only be those who are identified, with reasonable grounds, as having been directly involved in the chain of acts or omissions leading up to the event; and
- employees to be tested must not use alcohol during the next 8 hours until after the test has been completed, or they are advised a test is not required.

All employees are subject to testing in the following situations:

- a fatality;
- serious injury to any individual requiring medical assistance away from the scene; or
- significant loss or damage to property, equipment, vehicles or the environment.


In addition to these testing circumstances, any employee involved in an on-road vehicle collision will be referred for a test if the incident results in:

- a fatality;
- the need for medical assistance is away from the scene and the GCTU driver receives a citation for a moving vehicle violation; or
- towing of a disabled vehicle away from the scene and the GCTU driver receives a citation for a moving vehicle violation.

Since all employees may be subject to testing after a significant collision or other incident, they are to report the situation to their immediate supervisor as soon as possible after the incident and participate fully in any subsequent investigation.

5.6.3 Return to Duty after Voluntary Treatment

Testing will take place on a case-by-case basis, as part of a monitoring program developed by the Alcohol and Drug Program Administrator in conjunction with a Substance Abuse or EAP

	
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professional on return to work after treatment.

5.6.4 Return to Duty after Policy Violation

In those situations, where employment is continued after a policy violation, individuals will be required to pass a return to duty test and will be subject to unannounced testing for a minimum of one year up to a maximum of five years as a condition of continued employment.

5.6.5 Legal Compliance

Testing will take place to ensure compliance with any legal requirements, which a government may impose.

5.6.6 Safety Sensitive Positions

In addition to the testing program outlined above, as one of the final stages of the recruitment process, all applicants to a safety-sensitive position must pass a drug test as a condition of certification into the position. Candidates who are prescribed any impairment-causing medications have a responsibility to disclose that information to the independent qualified Third Party Administrator at the time of testing. Once in the position, they will be subject to random testing which will take place on an unannounced basis spread evenly throughout the year, with selection handled by an independent qualified Third Party Administrator.

U.S Department of Transportation annual random testing rates for the Federal Motor Carrier Safety Administration (FMCSA) are 25% of the average eligible participants for drugs and 10% for alcohol.

5.6.7 Confidentiality


The Program Administrator and designate(s) will administer test procedures consistently and treat all information with due consideration to an employee's reputation, privacy and dignity. All information collected in the course of administering the policy will be treated as confidential except where:

- disclosure is required by law, or
- an employee provides written authorization that such information be released under the company program, or
- limited disclosure is required when the use of alcohol or drugs/medications may endanger the life, health or property of others.

6. CONSEQUENCES OF A POLICY VIOLATION

6.1 General Procedures

If an employee violates the provisions of this policy or does not meet satisfactory standards of work performance as a result of alcohol or other drug use, appropriate disciplinary action will be taken. In all situations, an investigation will be conducted and documented to verify that a policy violation has occurred before disciplinary action is taken. Therefore, the supervisor has the authority and discretion to suspend any employee who is believed to be involved in an incident that could lead to disciplinary action pending the results of the investigation.

	
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The appropriate discipline in a particular case depends on the nature of the policy violation, the applicable collective agreement and the circumstances surrounding the situation. Some violations are considered sufficiently serious that termination is warranted on a first occurrence. This could include trafficking, possession, or consumption of alcohol or illegal drugs on company premises. In other cases, violations will result in progressive discipline, with action of increasing severity depending on the seriousness of the violation.

6.2 Testing Program

For all employees, any positive test result will be considered a violation of this policy whether or not the drugs or alcoholic beverage were actually consumed on company business or premises. Failure to report for a test within the designated time period, refusal to submit to a test, refusal to have test results reported to the Program Administrator or any attempt to tamper with a test sample are grounds for disciplinary action.

6.3 Safety and Risk Sensitive Positions

Any policy violation, including a positive test result, will be considered grounds for termination of employment. In these circumstances, should employment be continued, individuals will be required to enter into an agreement governing their continued employment which will be developed on a case by case basis, and may include any or all of the following conditions:

- complete an assessment by a substance abuse professional (SAP);
- follow any recommended treatment;
- receive clearance by the SAP that the recommended program was followed;
- pass a return to duty test;
- participate in unannounced test as recommended by the SAP, or as required by the company;
- adhere to any rehabilitation conditions or requirements;
- maintain satisfactory work performance levels; and
- receive no further positive test results or policy violations during the monitoring period.

If the employee has a prescription for a medication that would cause a positive result in a drug test, that employee can have their physician complete a Functional Assessment Form that will list the specific limitations and restrictions and the employee can follow the accommodation request process.

7. RESPONSIBILITIES

7.1 Employees

Employees are expected to act in a safe and productive manner, and are responsible to read and understand this policy, and to:

- arrive fit for work and remain fit for work during their on duty time, free from any adverse performance effects of alcohol or other drugs;
- for employees in safety-sensitive and risk-sensitive positions inform the Alcohol and Drug Program Administrator immediately if he/she is using an impairment causing medication such



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as medicinal marijuana, OxyContin, Dilaudid etc. An employee is not required to disclose his/her specific medical diagnosis; however, he/she is required to provide a copy of the prescription from his/her doctor. They will also be required to provide a Functional Abilities Form with any and all restrictions and limitations that are in effect while taking the medication in relation to their bona fide job requirements and safety requirements.

- seek advice and follow appropriate treatment promptly if they suspect they have an existing or emerging substance dependency problem (e.g. from the company EAP, HR, a personal physician);
- follow any recommended monitoring/aftercare program after primary treatment for alcohol or drug problems as recommended by the Alcohol and Drug Program Administrator or the Substance Abuse Professional (SAP) assigned to the case;
- exercise due diligence in terms of co-workers' fitness for duty and discourage a co-worker from remaining at work in an unfit condition that may endanger themselves or others;
- advise their supervisor if they receive an impaired driving charge when operating a company vehicle or when driving on company business or if their job position requires driving or operating any Greyhound vehicles or equipment.
- participate in the testing program as and when required to do so under this policy; and
- co-operate in any investigation into a policy violation.

7.2 Managers and Supervisors

Managers and Supervisors are responsible and accountable for compliance with and the implementation of this policy. They will receive specific training on workplace alcohol and other drugs issues and on their role under this policy. The following are some of their responsibilities:

- minimize risk and liabilities in all of the operations;
- ongoing performance management to ensure safe operations and effectiveness of the program;
- implement the policies and procedures consistently and liaise with HR and Alcohol and Drug Program Administrator as required;
- guide employees who seek assistance for a problem to appropriate resources;
- refer the employee for an alcohol and drug test in a reasonable cause or post incident situations as and when required to do so under this policy; and
- notify management when there are grounds to believe someone is in possession of banned substances.


7.3 Human Resources

The Human Resources Department is responsible for:

- administering this policy consistently in conjunction with all applicable departments and resolving questions of interpretation with due regard for the fair treatment of employees, and with liaison with Labour Relations and Management
- ensuring the policy is administered with due consideration of the company's labor contracts and any government Acts or Regulations with support from Labour Relations and Management

7.4 Alcohol and Drug Program Administrator

The program administrator is responsible for:

	
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- ensuring the policy is communicated to all employees;
- co-coordinating development and delivery of education programs on health awareness, substance use, and the availability of treatment resources;
- co-coordinating development and delivery of supervisor alcohol and drug training programs for performance monitoring and potential problem identification;
- facilitating fitness for work assessments and recommendations, which may identify medical work limitations;
- in conjunction with the EAP or SAP, providing programs to monitor employees returning to work after treatment for alcohol or drug-related problems;
- responding to requests for advice on a worker's fitness to work arising from the effects of prescription and over-the-counter medications;
- co-ordinate the company alcohol and drug testing program including arranging for the necessary services to support the program (random selection system, sample collection, laboratory analysis and medical review of results, as well as SAP assessments); and
- filing and storage of all testing program results in a secure and confidential manner.

7.5 Driver Safety and Development

Driver Safety and Development is responsible for specific administrative components of the testing program for safety-sensitive positions, including:

- confirmation of driver qualifications prior to a job offer;
- ensuring training for the new hire operators is completed as recommended by the Program Administrator; and
- receiving and maintaining written confirmation that each new operator has received the policy and applicable regulations.

7.6 Employee Assistance Program (EAP)

This is a voluntary employee support function, which provides confidential professional assistance to employees and their immediate families to resolve problems that affect their personal lives or job performance.


7.7 Substance Abuse Professional (SAP)

The SAP will assess individuals who have been referred after a policy violation to determine if they have a substance abuse problem, recommend appropriate treatment or education programs, confirm that the program was attended, and in conjunction with the Alcohol and Drug Program Administrator or the treatment facility, develop programs to monitor employees returning to work, including a program of unannounced follow-up testing.

7.8 U.S. Department of Transportation Requirements

In accordance with U.S. Department of Transportation regulations (49 CFR 382), all drivers will be advised of the regulations and their application. The alcohol and drug testing program will be conducted in accordance with the regulatory requirements. Drivers will be required to confirm in writing receipt of the company policy and information about the regulations.

Drivers that test positive for alcohol with a test result of 0.02 to 0.039 BAC will be held out of service for at least 24 hours and are subject to discipline under Greyhound's policy. A positive

	
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drug test result, or an alcohol test result of 0.04 BAC or more, or refusal to participate in the testing process, or any other policy violation will be grounds for termination of employment under GCTU's policy, and any continuation in employment will be subject to conditions set out by the company (as outlined in Section 6.3).

GCTU will investigate the qualifications of any driver applying to a position to operate a commercial motor vehicle, and with the driver's consent, will contact all previous employers in the past two years to determine whether the driver is qualified to drive under the regulations.


In addition, GCTU is required by the regulation to maintain all records of DOT violations, and to provide them to subsequent employers over the next two years with the consent of the individual applying for employment.

7.9 Policy Evaluation

To ensure that this policy continues to meet the established objectives and remains responsive to current circumstances as well as evolving needs, its implementation will be monitored on an ongoing basis and the policy may be amended as required. Automatic review will occur every 18 months.

APPENDICES

- Appendix I – Guidelines on Medications
- Appendix II – Guidelines for the Hosting of Social Events
- Appendix III – Alcohol and Drug Testing Procedures
- Appendix IV – Medicinal Marijuana

	
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APPENDIX I

GUIDELINES ON MEDICATION

Employees are expected to manage potential impairment during working hours due to the legitimate use of medications. The following drug categories have been associated with performance impairment and are provided as a guideline to employees in assessing their own situation. The list is not exhaustive; there are numerous other over-the-counter and prescription drugs which when taken may impact negatively on performance.

Therefore, employees are expected to consult with their personal physician or pharmacist to determine if use of the medication will have any potential negative impact on job performance and follow the company policy (section 4.3) regarding reporting to the Alcohol and Drug Program Administrator if they are advised of potential safety impacts and the need for accommodation.

- A. Antihistamines – are widely prescribed for hay fever and other allergies (e.g. Chlor-Triplon, Benadryl). They are also found in many cold medications.
- B. Motion Sickness Drugs – are used to prevent motion sickness and nausea (e.g. Gravol, Antivert).
- C. Barbiturates (e.g. Phenobarbital), Sedatives, Hypnotics and Tranquilizers (e.g. Valium Halcion, Librium), and Antidepressants (e.g. Elavil, Xanax). Some of these ingredients are also found in medications taken for digestive and other disorders.
- D. Narcotic Analgesics (e.g. Demerol, Darvon, Codeine). Codeine is often found in combination drugs such as 222s, 282s, 292s or Tylenol #1, 2, 3's.
- E. Stimulants – Medication used for central nervous system stimulation and for appetite suppression can produce sensations of wellbeing which may have an adverse effect on judgment, mood and behaviour (e.g. amphetamines or medications sold as “diet pills”).
- F. Anticonvulsants – are used to control epileptic seizures and can cause drowsiness in some patients (e.g. Dilantin).
- G. Cold Tablets/Cough mixtures – (e.g. Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).
- H. Muscle Relaxants – (e.g. Flexeril, Robaxial)
- I. Anti-inflammatories (e.g. Indocid, Naprosyn, Ansaid, Voltaren).
- J. Medical marijuana, OxyContin, Dilaudid

	
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APPENDIX II

GUIDELINES FOR THE HOSTING OF SOCIAL EVENTS

The use of alcohol in conjunction with any company social event is permitted with the prior approval of the Senior Vice President or designate and in accordance with the following guidelines:

Professional/trained servers will work at each event and/or will supervise the use of untrained servers.

Each event will have a designated “chief host/hostess” (with assistance from others) with responsibility to:

- obtain appropriate permits;
- establish the general tone of the event;
- act as the sole contact with the servers during the function regarding opening and closing times, food and beverage arrangements, etc;
- ensure bars are attended at all times;
- ensure alcohol is not served to individuals who appear to be intoxicated or are not of legal drinking age;
- take steps to prevent abusive or unsafe behavior;
- take steps to prevent an apparently intoxicated attendee from driving after the function;
- provide alternate transportation or accommodation where necessary; and
- contact the police if an incident occurs or an attendee disregards advice and attempts to drive in an intoxicated state.

In all situations, events will be managed in a way that avoids the potential for accidents or collisions, including identifying and eliminating potentially harmful situations.

Responsible serving practices will include providing food and non-alcoholic drinks, including coffee and tea after the bar has closed, establishing a firm time to end the event, and stopping service of alcohol at least one hour prior to the event being over.

Any hosting situation that results in inappropriate behavior or risk to health and safety of attendees or the community will result in a review of these policies and active steps to ensure the problems do not occur again.



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APPENDIX III

ALCOHOL AND DRUG TESTING PROCEDURES

Sample collection, testing and reporting of results will be conducted in accordance with standards established by the U.S. Department of Health and Human Services and accepted in Canada, in order to ensure the accuracy and integrity of results. Rigorous sample collection, storage and chain-of-custody procedures will be followed. In addition:

- Testing will be conducted in those circumstances outlined under the company policy to determine the presence of the following classes of drugs: cannabinoids, amphetamine/methamphetamine, cocaine, opiates, phencyclidine and alcohol. In certain situations, covered by a return to duty agreement, the testing program may include additional drugs on the direction of the Substance Abuse Professional or treating physician.

Testing Program	Non-Sensitive Position	Risk-Sensitive Position	Safety-Sensitive Position
Reasonable Cause	✓	✓	✓
Post Incident	✓	✓	✓
Return to duty (after treatment)	✓	✓	✓
Return to duty (after violation)	✓	✓	✓
Pre-Certification	X	X	✓
Random	X	X	✓
Alcohol Cut-off:			
Violation	0.04 BAC	0.04 BAC	0.04 BAC
Removal from Duty		0.02 – 0.039 BAC	0.02 – 0.039 BAC

- A calibrated breathalyzer with a printout of test results will administer alcohol tests; a saliva strip and urine testing for alcohol will only be conducted in those locations where a Breathalyzer cannot be quickly accessed. All drug tests will be administered by urinalysis.
- Collection of urine specimens and administration of alcohol tests will be performed by trained nurses or trained collection agents at company-designated collection sites. In post incident and reasonable cause testing situations, samples will be collected as soon as possible after the triggering incident, but collection attempts will end eight (8) hours after the incident for an alcohol test and thirty-two (32) hours after the incident for a drug test.
- All individuals who are tested are required to sign a form to acknowledge the accuracy of the employee and employer information and authenticity of the specimen. They will be given a copy



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of the Drug Testing Custody and Control Form and the Breath Alcohol Testing Form for their records.

- Urine samples will be analyzed by a fully qualified and accredited laboratory using a two-step process with initial screening by immunoassay and all confirmations being performed by gas chromatography/mass spectrometry (GC/MS).

A positive drug test is one in which the amount of drug in the sample identified by the confirmation test is at or exceeds the cut-off levels established by the U.S. Department of Health and Human Services for workplace testing programs throughout North America.

- Confirmed, positive drug test results will be reviewed by a qualified Medical Review Officer (MRO), who will discuss the result with the employee in an effort to determine whether a positive test could have resulted from the legitimate use of medications or other medical explanations. The individual concerned will be given an opportunity to explain the finding to the MRO who will then determine whether the result will be reported to the company Program Administrator or designate as a negative or a verified positive.
- Medical marijuana is not a valid medical explanation for positive drug testing results. It remains **unacceptable for any employee in a safety-sensitive position** subject to drug testing under the Department of Transportation drug testing regulations to use marijuana.
- In the case of a verified positive test result of a urine test conducted in accordance with this policy, the person who has been tested may request the MRO to direct the split sample to be tested by an accredited laboratory of the person's choice within seventy-two (72) hours of receiving their results. If a second confirmed positive test is reported, the person who requested the second analysis is responsible for reimbursing the company for the associated costs.
- For the purpose of this policy, a positive alcohol test will be one in which the blood alcohol concentration is at or above 0.04 BAC. However, in those instances where an employee is subject to an unannounced testing program on return to duty after a policy violation or treatment, a positive test will be one in which the blood alcohol concentration is 0.02 or more as registered on the breathalyzer. Individuals holding a safety-sensitive position will be removed from service for a minimum of 24 hours with an alcohol test result of 0.02 – 1.039 BAC.
- The collector will directly advise the company Program Administrator or designate of any positive alcohol test result so that action can be taken to ensure the employee is transported home safely.
- Any positive drug or alcohol test result will be considered a violation of company policy, whether or not the drugs or alcoholic beverage were actually consumed on company business or premises. Failure to report directly for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to management or an attempt to tamper with a test sample are grounds for disciplinary action.
- All test results will be reported directly to the company Program Administrator or designate. Except for the release of information in accordance with this policy and in situations affecting the health and safety of workers and the public, results of all testing will be maintained by the Program Administrator and will be kept confidential.

	
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APPENDIX IV

MEDICINAL MARIJUANA

Medical marijuana will be treated the same as all other prescription, mind altering medications. The company has the same expectations from employees who use medicinal marijuana and other mind altering medications as who use all other types of medication and will accommodate individuals up to the point of undue hardship.

Guidelines

- Employees may only use medicinal marijuana with a prescription in their names from a physician.
- If an employee is required to use medicinal marijuana while at work, he/she must inform the Alcohol and Drug Program Administrator. An employee is not required to disclose his/her specific medical diagnosis; however he/she is required to provide a note from his/her doctor.
- All information provided in regard to medicinal marijuana use is considered confidential and will be treated as such, keeping an employee's privacy as a top concern second only to safety.
- Employees who have a medical condition which requires additional accommodation can discuss their marijuana use schedule in the context of the general accommodation plan with the Alcohol and Drug Program Administrator and their primary care physician.
- The company will work with the individual that requests accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable.
- For employees in safety-sensitive positions who have disclosed their prescription for medicinal marijuana, they will be withheld from service without pay and will be entitled to use sick leave pay or STD as per eligibility guidelines. The accommodation process will then be followed.
- For employees in risk-sensitive positions who have disclosed their prescription for medicinal marijuana, they will be restricted to other job functions not involving safety type maintenance repairs or driving duties for a reasonable period of time until the accommodation process is completed.
- Employee will be required to complete an accommodation request form and have their physician complete a FAF listing their specific limitations. The accommodation process will then be followed.
- The Functional Abilities Form completed by the employee's physician must be submitted to the Alcohol and Drug Program Administrator.
- For employees in all other positions, they are not obligated to notify the company of their prescription unless it may alter their ability to perform their duties, they are required to operate motorized equipment or if they require an accommodation.

Use of Medicinal Marijuana While at Work

- In the event that an employee is taking medicinal marijuana during regular working hours, he/she is expected to use in moderation, only at the recommended level of dosage and the applicable frequency of doses.
- The company asks that, where possible, employees who require medicinal marijuana use a method of ingestion other than smoking.
- Employees who choose to smoke medicinal marijuana must abide by all provincial smoking regulations and are not permitted to smoke in the presence of other employees, or on the premises.