

Standard for Alcohol and Drugs

*Conformance with this Standard is mandatory.
You may not 'opt-out' of any requirement identified herein.*

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For Revision and Approval history, see Nexen Management System approval workflow.

1.0 INTRODUCTION TO THIS STANDARD

1.1 PURPOSE

The purpose of this Standard is to set out the minimum requirements and quality expectations that must be met when:

- Managing the risks of Alcohol and Drug use on Employees' and Contingent Workers' performance.

This is important because it will:

- Ensure the safety of all Employees and Contingent Workers, the public and the environment.

**Note: This Standard is only one facet of an overall approach to safety and is part of the Company's overall approach to risk mitigation and risk management. This Standard may be supplemented by Location Requirements, Rules of Work or other applicable Company documentation.*

1.2 SCOPE

This Standard applies to all Company Businesses and Company Premises.

Additional requirements or exceptions to this Standard are set out in COP-05, Location Requirements and Rules of Work.

Contingent Workers, as individuals or as an organization, will be advised of this Standard and are expected to implement a policy or program which has standards at least as stringent as those set out in this Standard and associated COPs or, in the case of Contingent Workers engaged in Canada or by a Nexen company subject to Canadian jurisdiction, as outlined in the Construction Owners Association of Alberta's Canadian Model (Canadian Model for Providing a Safe Workplace effective October 08, 2014, as updated and approved from time to time).

Additionally, Contingent Workers engaged in, or by a Nexen company subject to the jurisdiction of, a location covered by Nexen Location Requirements must have policies or programs which have standards at least as stringent as applicable Location Requirements [and Rules of Work].

Attention: Failure to comply with this Standard by Employees may be grounds for discipline up to and including termination of employment for cause.

1.3 INTENDED AUDIENCE

The intended audience for this Standard is detailed in the table below.

Role	Description
VP – HSE	Will ensure this Standard is maintained and supported in all areas of the Company's business. Will determine the authorization of any deviations and enhancements to this Standard that are first approved by the Specialist of Occupational Health & Industrial Hygiene
Alcohol and Drug Coordinator	Will determine the approval of any deviations and

Role	Description
	enhancements to this Standard
HSE Supervisors/Managers	Will support the implementation of this Standard, Location Requirements and Rules of Work
Company Supervisors/Managers	Will ensure this Standard is communicated to Employees and Contingent Workers
Employees and Contingent Workers	Will adhere to the applicable requirements in this Standard, Location Requirements and Rules of Work

1.4 DEFINITIONS OF TERMS

For definitions, see the [Nexen Glossary](#). Capitalized terms used in this Standard have the meanings set out in the Nexen Glossary.

After-Care - is the provision of counselling and periodic Alcohol Testing and Drug Testing, treatment and rehabilitation in order to assist an Employee to successfully re-enter and remain in the workplace.

Alcohol - means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohol including methyl or isopropyl alcohol.

Alcohol and Drug Coordinator - is the Employee who is responsible for overseeing and administering this Alcohol and Drug Standard.

Alcohol and Drug Standard or Standard - means this Alcohol and Drug Standard, including any applicable COPs.

Alcohol Testing (Alcohol Test) - means the collection of specimen(s), screening analysis and confirmation Testing for Alcohol concentration.

Cannabis - means cannabis or marijuana in any form.

CMPR - means the Access to Cannabis for Medical Purposes Regulation, SOR/2016-230 as amended or replaced from time to time

Company or Nexen - means Nexen Energy ULC and its majority owned subsidiaries and affiliates for which it has managerial responsibility.

Company Business - refers to all activities undertaken by Employees in the course of the Company's operations and all other activities (including at work related social events) in which Employees participate in the course of their employment.

Company Premises - includes but is not limited to land, facilities, aircraft, equipment, Living Accommodations and vehicles owned, leased, rented, controlled or used by or on behalf of the Company for the purpose of conducting Company Business and any other sites and locations specified in any applicable Location Requirements.

Contractor - refers to any person or entity, including their employees or sub-contractors, that is contracted, sub-contracted, or otherwise engaged to provide services to the Company on an invoice basis.

COPs - means the codes of practice associated with this Standard, as such codes may be amended, supplemented or deleted from time to time.

Corrective Action - means intervention when unacceptable behaviour or actions occur.

DER - means the designated employee representative, who is an individual assigned by the Company to receive Alcohol and Drug Testing results.

Drug(s) - means illicit drugs, substances, chemicals or agents (a) which have been obtained illegally; (b) the use or possession of which is unlawful; (c) which requires an authorization from an authorized healthcare practitioner and for which the Employee does not have a personal prescription; and (d) Cannabis.

Drug Paraphernalia - includes any item which is associated with the use of any Drugs and also includes any device, item, substance or equipment which is intended to be used as a masking agent or to otherwise tamper with, adulterate or substitute any sample provided for Drug Testing or Alcohol Testing.

Drug Testing (Drug Test) - means the collection of specimen(s), screening analysis and confirmation Testing for the presence of a panel of Drugs.

EFAP - means the Employee and Family Assistance Program, which provides confidential support for Employees and their families who may be experiencing personal, family or workplace problems.

Employee(s) - means a regular full-time, part-time, temporary, casual and fixed-term employee of the Company.

Fitness for Work (Fit for Work) - means being able to safely perform assigned duties without any limitations due to the use or after-effects of Alcohol, Drugs or Medications.

HSE&SR - means the Company's health, safety, environment and social responsibility department.

Location Requirements - means any country or location specific requirements or enhancements related to this Standard.

Living Accommodations - means all offshore living accommodations and any living accommodations provided by or for the Company and attached or associated with Company Business.

Medical Review Officer (MRO) - means a licensed physician who evaluates Testing results.

Medication - refers to a drug obtained legally, either over-the-counter or, through a personal prescription from an authorized healthcare practitioner or obtained with a medical document issued by an authorized healthcare practitioner under the CMPR.

Near Miss - an event which could have resulted in serious harm to people or the environment, damage to property or loss of production.

POCT - means point of collection Testing.

Reasonable Grounds - has the meaning given to it in the Alcohol and Drug Testing COP-03.

Rules of Work - specific rules and exemptions for Company Premises approved by management and amended from time to time.

Safety-Sensitive Position (SSP) - is a position in which an individual has a key and direct role in an operation where performance impacted by Alcohol and Drug use could seriously impact the health or safety of Employees, Contractors, the public or the environment. This category includes all Employees required to rotate through a safety-sensitive position, provide temporary relief in a safety-sensitive position, those who may

perform the same duties from time to time or have significant ongoing responsibilities for decisions or actions (i.e. Supervisors/Managers) that are likely to affect safe operations. For further information see COP-02.

Safety-Sensitive Work Location (SSWL) - includes those parts of the Company's operations where there are operating hazards such that anyone working at the location, who is not Fit for Work, could seriously impact the health or safety of Employees, the public or the environment. For further information see COP-02.

SAP/SAE - means a substance abuse professional or substance abuse expert, which is an individual with knowledge of, and clinical experience in, the diagnosis and treatment of Alcohol and Drug related disorders.

Serious Incident - refers to a work-related incident that caused or had the potential to cause any of the following: serious injury; fatality; serious or major environmental incident or impact; significant or major loss or damage to vehicles, equipment or property; or serious or major loss of production or revenue. This includes a minor incident with significant potential for more serious consequences, and includes a Near Miss.

Supervisor/Manager - means an individual accountable for a particular Company Premise, department or area, including positions that are directly responsible for the performance of individuals conducting Company Business.

Testing (Test) - refers to Alcohol Testing and Drug Testing, as applicable.

1.5 CONFLICT RESOLUTION

Where a conflict arises with the requirements set out in this Standard, and an update to the document or a variance is required, escalate the issue to the Accountable Owner.

2.0 REQUIREMENTS OF THIS STANDARD

The following table outlines the minimum requirements and quality expectations that must be satisfied to meet the intent of this Standard.

2.1 STANDARD REQUIREMENT TABLE

Requirement Number	Requirements
Contingent Worker Requirements	
2.1.1	<p>Must implement a policy or program which has standards at least as stringent as those set out in this Standard, Location Requirements and Rules of Work.</p> <p>These COPs include:</p> <ul style="list-style-type: none"> • GBL-PRA-0223: COP-01 Medications • GBL-PRA-0224: COP-02 Safety-Sensitive Positions (SSP) / Work Locations (SSWL) • GBL-PRA-0225: COP-03 Alcohol and Drug Testing • GBL-PRA-0226: COP-04 Return to Work • GBL-PRA-0227: COP-05 Permitted Uses of Alcohol • GBL-PRA-0228: COP-06 Prevention, Assistance, Rehabilitation & After-Care • GBL-PRA-0229: COP-07 A&D Standard Violations • GBL-PRA-0233: A&D Reasonable Grounds Testing Referrals Checklist • GBL-PRA-0234: A&D Reasonable Ground Referral Form • GBL-PRA-0235: A&D Post Incident Referral Form
2.1.2	<p>In the case of Contingent Workers engaged in Canada or by a Nexen company subject to Canadian jurisdiction</p> <p>Must implement a policy or program as outlined in the Construction Owners Association of Alberta's Canadian Model (Canadian Model for Providing a Safe Workplace effective October 8, 2014, as updated and approved from time to time).</p>
Employee Requirements	
2.1.3	<p>Must be in compliance with the Alcohol and Drug Work Rules set out in Appendix C. Employee Alcohol and Drug Work Rules and GBL-PRA-0227: COP-05 Permitted Uses of Alcohol.</p>
2.1.4	<p>Must report for and submit to Testing as required.</p> <p><i>*Note: Any Employee asked to undergo Alcohol Testing or Drug Testing will be provided with the reason for such a request.</i></p>
2.1.5	<p>Must be in compliance with this Standard, applicable Location Requirements and Rules of Work.</p>
2.1.6	<p>Must assume ownership of an Alcohol or Drug dependency by seeking professional assistance and making use of the counseling and treatment services made available by the Company or through outside arrangements when approved by the Company.</p>

Requirement Number	Requirements
2.1.7	Must cooperate fully during investigations of work-related incidents.
2.1.8	Must be in compliance with treatment or rehabilitation programs aimed at improving job performance, eliminating safety risks and reintegrating into the Company workforce.
2.1.9	Must notify their Supervisor/Manager if they are aware or reasonably suspect another Employee is not Fit for Work due to use of Alcohol or Drugs or misuse of Medications.
2.1.10	Must obtain advice from an authorized healthcare practitioner and a Company occupational health services professional (in consultation with Company approved third party providers, as required) if a Medication may affect their ability to safely perform their duties or will otherwise render them not Fit for Work and report any concerns in this respect to their Supervisor/Manager or the Company's occupation health services department to assist with decisions regarding modification of duties.
Supervisor/Manager Requirements	
2.1.11	Must ensure this Standard is communicated to Employees.
2.1.12	Must endeavour to identify Employee behaviour and performance problems that may be linked to the use of Alcohol and Drugs or the misuse of Medications and notify the Alcohol and Drug Coordinator or HR Business Partner, as appropriate.
2.1.13	Must ensure that an Employee who is not Fit for Work is removed from Company Premises and HR or the occupational health services department has arranged for an assessment where appropriate.
2.1.14	Must follow the Alcohol and Drug Testing Process when there are Reasonable Grounds to believe that the conduct of an Employee is indicative of the use or after effects of Alcohol or Drugs.
2.1.15	Must ensure that investigations of work related incidents are carried out in accordance with corporate incident investigative procedures, including referral of Employees for Alcohol and Drug Tests, when required.
Company Groups Outside Canada, Who Do Not Have Alcohol and Drug Location Requirements	
2.1.16	Must develop their own country specific Alcohol and Drug Location Requirements OR Must follow the Canada Alcohol and Drug Location Requirements
Company Requirements	

Requirement Number	Requirements
2.1.17	<p>Must ensure no Employee with an Alcohol or Drug problem will be disciplined or terminated because of the Employee's involvement in a rehabilitation effort or for voluntarily requesting rehabilitative help in overcoming an Alcohol or Drug problem.</p> <p><i>*Note: Involvement in treatment or seeking assistance for an Alcohol or Drug problem after a Standard violation or a Serious Incident has occurred or following a request for a Test will not prevent the Employee from being disciplined or terminated.</i></p>
2.1.18	<p>Must ensure Alcohol and Drug searches are conducted or supervised by designated management personnel in accordance with applicable Location Requirements or any Standard or Procedural Aid adopted by the Company from time to time.</p>

2.2 MEASURING CONFORMANCE AND CONTINUOUS IMPROVEMENT

The following table summarizes the methods that must be used to measure conformance with the intent of this Standard.

Means of Verification	Method of Measurement	Role for Review and Interval	Location of Key Records and Reports
Self-Assessment	Conformance Checklist	Reviewer: Responsible Author Interval: 3 years	Contact Responsible Author
Audit Assessment	Conformance Checklist(s)	Auditor: Responsible Author Interval: 3 years	Contact Responsible Author

The Methods of Measurement, identified above, will be used as a foundation to determine whether this Standard is effective and efficient; and, whether opportunities exist to improve further. Refer to the [NMS Assurance Activities Business Process](#) for further details and see [Appendix B](#) for the Conformance Checklist.

3.0 REFERENCES AND RELATED INFORMATION

3.1 EXTERNAL REFERENCES

Not Applicable

3.2 INTERNAL REFERENCES

- [GBL-PRA-0223: COP-01 Medications](#)
- [GBL-PRA-0224: COP-02 Safety-Sensitive Positions \(SSP\) / Work Locations \(SSWL\)](#)
- [GBL-PRA-0225: COP-03 Alcohol and Drug Testing](#)
- [GBL-PRA-0226: COP-04 Return to Work](#)
- [GBL-PRA-0227: COP-05 Permitted Uses of Alcohol](#)
- [GBL-PRA-0228: COP-06 Prevention, Assistance, Rehabilitation & After-Care](#)
- [GBL-PRA-0229: COP-07 A&D Standard Violations](#)
- [GBL-PRA-0233: A&D Reasonable Grounds Testing Referrals Checklist](#)
- [GBL-PRA-0234: A&D Reasonable Grounds Referral Form](#)
- [GBL-PRA-0235: A&D Post Incident Referral Form](#)
- [GBL-PRA-0236: Post Incident Procedural Workflow](#)
- [GBL-PRA-0249: Identifying Employee Fitness for Work Procedural Workflow](#)

The following Standards and Procedural Aids enable implementation of this Standard:

- [GBL-PRA-0231: How We Work: Our Integrity Guide](#)
- [GBL-STD-0027: Standard for Confidential Information](#)
- [GBL-STD-0069: Standard for Information Management](#)
- [GBL-STD-0068: Standard for Information Security and IT Operations](#)
- [GBL-STD-0073: Standard for Privacy of Personal Information](#)
- [GBL-PRA-0197: Procedural Aid for Information Security Classification](#)

3.3 RELATED INFORMATION

Not Applicable

APPENDIX A. ROLES AND RESPONSIBILITIES

For a description of the NMS Roles and Responsibilities, refer to the [Standard for the Nexen Management System](#).

APPENDIX B. CONFORMANCE CHECKLIST

The following table identifies the conformance checklist requirements.

Requirement Number	Requirements	Yes (Y)	No (N)	Needs Improvement (NI)	Not Applicable (N/A)
Contingent Worker Requirements					
2.1.1	Implemented a policy or program which has standards at least as stringent as those set out in this Standard, Location Requirements and Rules of Work.				
2.1.2	<p>In the case of Contingent Workers engaged in Canada or by a Nexen company subject to Canadian jurisdiction</p> <p>Implemented a policy or program as outlined in the Construction Owners Association of Alberta’s Canadian Model (Canadian Model for Providing a Safe Workplace effective October 8, 2014, as updated and approved from time to time).</p>				
Employee Requirements					
2.1.3	Complied with the Alcohol and Drug Work Rules set out in Appendix C. Employee Alcohol and Drug Work Rules and <i>COP-05 Permitted Uses of Alcohol</i> .				
2.1.4	<p>Reported for and submitted to Testing as required.</p> <p><i>*Note: Any Employee asked to undergo Alcohol Testing or Drug Testing will be provided with the reason for such a request.</i></p>				
2.1.5	Complied with this Standard, applicable Location Requirements and Rules of Work.				

2.1.6	Assumed ownership of an Alcohol or Drug dependency by seeking professional assistance and making use of the counseling and treatment services made available by the Company or through outside arrangements when approved by the Company.				
2.1.7	Cooperated fully during investigations of work-related incidents.				
2.1.8	Complied with treatment or rehabilitation programs aimed at improving job performance, eliminating safety risks and reintegrating into the Company workforce.				
2.1.9	Notified their Supervisor/Manager if they were aware or reasonably suspect another Employee is not Fit for Work due to use of Alcohol or Drugs or misuse of Medications.				
2.1.10	Obtained advice from an authorized healthcare practitioner and a Company occupational health services professional (in consultation with Company approved third party providers, as required) if a Medication may affect their ability to safely perform their duties or will otherwise render them not Fit for Work and report any concerns in this respect to their Supervisor/Manager or the Company's occupation health services department to assist with decisions regarding modification of duties.				
Supervisor/Manager Requirements					
2.1.11	Ensured this Standard was communicated to Employees.				
2.1.12	Endeavoured to identify Employee behaviour and performance problems that may be linked to the use of Alcohol and Drugs or the misuse of Medications and notified the Alcohol and Drug Coordinator or HR Business Partner, as appropriate.				
2.1.13	Ensured that an Employee who was not Fit for Work is removed from Company Premises and HR or the occupational health services department has arranged for an assessment where appropriate.				
2.1.14	Followed the Alcohol and Drug Testing Process when there were Reasonable Grounds to believe that the conduct of an Employee is indicative of the use or after effects of Alcohol or Drugs.				
2.1.15	Ensured that investigations of work related incidents were carried out in accordance with corporate incident investigative procedures, including referral of Employees for Alcohol and Drug Tests, when required.				

Company Groups Outside Canada, Who Do Not Have Alcohol and Drug Location Requirements				
2.1.16	Developed their own country specific Alcohol and Drug Location Requirements OR Followed the Canada Alcohol and Drug Location Requirements			
Company Requirements				
2.1.17	Ensured no Employee with an Alcohol or Drug problem was disciplined or terminated because of the Employee's involvement in a rehabilitation effort or for voluntarily requesting rehabilitative help in overcoming an Alcohol or Drug problem. <i>*Note: Involvement in treatment or seeking assistance for an Alcohol or Drug problem after a Standard violation or a Serious Incident has occurred or following a request for a Test will not prevent the Employee from being disciplined or terminated.</i>			
2.1.18	Ensured Alcohol and Drug searches were conducted or supervised by designated management personnel in accordance with applicable Location Requirements or any Standard or Procedural Aid adopted by the Company from time to time.			

APPENDIX C. EMPLOYEE ALCOHOL AND DRUG WORK RULES

Employees:

- are prohibited from using, possessing, consuming, cultivating, manufacturing, distributing, dispensing, trading or offering for sale Alcohol, Drugs and Drug Paraphernalia when performing Company Business or on Company Premises;
- are prohibited from using, possessing, consuming or being under the influence of Alcohol or Drugs when operating a Company vehicle that is owned, leased, rented, controlled or used by or on behalf of the Company for the purpose of conducting Company Business;
- must report to and remain Fit for Work at all times while on Company Premises, when performing Company Business and when designated on-call;
- must comply with requests for searches and Testing (Refer to COP-03 Alcohol and Drug Testing);
- must not Test positive at or above the Alcohol or Drug cut-offs outlined in the applicable Location Guide;
- must not adulterate, substitute or tamper with Testing samples;
- are prohibited from manufacturing, distributing, trading or offering for sale any Medications;
- are prohibited from inappropriately using Medications or possessing or using Medication which requires a personal prescription from an authorized healthcare practitioner and for which the Employee does not have a proper prescription from an authorized healthcare practitioner;
- must review Medication labels and accompanying leaflets carefully and consult with their authorized healthcare practitioner and report Medications which may affect the safe operation of vehicles or equipment of any kind or may otherwise impede their ability to perform their duties safely and follow any required workplace modifications;
- must use Medications in a safe, responsible and prescribed manner (refer to COP-01 Medications); and
- must not use Alcohol or Drugs after a Serious Incident until Tested or advised by the Company that a Test is not required.

APPENDIX D. ADDITIONAL INFORMATION

Statement:

The Company recognizes that the inappropriate use of Alcohol and Drugs can adversely affect the safety and well-being of Employees and potentially the communities in which it operates.

The Company is committed to providing a safe and healthy work environment and to maintain the public's trust and confidence in the Company. Employees and the Company share a responsibility to ensure their own safety and the safety of those affected by their activities.

Persons Affected:

All Employees will be treated fairly and with respect under this Standard.

Standard:

This Standard is intended to outline the standards and expectations associated with Alcohol and Drug use and confirm the Company's commitment to safety and its commitment to minimizing risk associated with its operations. This Standard is only one facet of an overall approach to safety and is part of the Company's overall approach to risk mitigation and risk management. This Standard may be supplemented by Location Requirements, Rules of Work or other applicable Company documentation.

Implementation of Work Rules/Standards:

This Standard does not reduce the need for effective performance management or eliminate the need for awareness, training and education. The Company will use a variety of methods to ensure all Employees are aware of their role in supporting this Standard.

This Standard outlines the importance of prevention and early identification of potential Alcohol and Drug problems. The Company will make information available to Employees on how to access help for Alcohol or Drug issues.

Self-Referral:

Employees are strongly encouraged to self-refer to EFAP and their Supervisor/Manager, HR representative or the Company's occupational health services department if they have Alcohol or Drug concerns. If any Employee requests assistance, prior to a request for a Test or other Standard violation, for an Alcohol or Drug problem, a referral may be made to EFAP or an SAP/SAE.

The Employee will be expected to comply with any recommended treatment and After-Care programs.

If an Employee fails to self-refer prior to a Standard violation or a request for a Test which results in a positive Test, the Company will determine the appropriate action, including any disciplinary measures. The appropriate action in a particular case depends on the nature and severity of the Standard violation and the circumstances surrounding the situation. The disciplinary decision will be based on factors including but not limited to the employment record of the Employee; the circumstances surrounding the Standard violation; and, the importance of deterrence of such behavior by other Employees.

Involvement in treatment or seeking assistance for an Alcohol or Drug problem after a Standard violation or a Serious Incident has occurred or following a request for a Test will not prevent the Employee from being disciplined or terminated.

If the Company determines that the Employee's conduct will be addressed in a disciplinary manner, the Company will place primary importance upon deterring similar behaviour by other Employees and will terminate the Employee unless termination would be unjust in all of the circumstances.

Support During and After Treatment

In appropriate cases, Employees may be eligible for disability benefits while in treatment and recovery, provided they attend a treatment program approved by the Company and/or insurer and comply with all other plans and processes as required by the Company.

Alcohol and Drug Searches

The Company reserves the right to investigate any situation when there are Reasonable Grounds to believe that Alcohol, Drugs or Drug Paraphernalia are present on Company Premises in violation of this Standard. In some circumstances law enforcement agencies may be involved. The Company also reserves the right to conduct searches for Alcohol, Drugs and Drug Paraphernalia on Company Premises at any time and this may extend to an Employee's property.

Searches may be conducted randomly or on Reasonable Grounds and may include the use of sniffer dogs.

Testing

To support a safe work environment, the Company reserves the right to conduct Alcohol and Drug Testing. This includes pre-access, certification, Reasonable Grounds and post-incident Tests. Other forms of Testing, including random Testing may be required in some locations. Alcohol Testing and Drug Testing may also occur prior to returning to work and on an unannounced periodic basis as part of a return to work agreement.

Any Employee asked to undergo Alcohol Testing or Drug Testing will be provided with the reason for such a request. Alcohol and Drug concentration levels and limits are found in Location Requirements. For further details on Testing, including the consequences of failing to Test, refer to COP-03 Alcohol and Drug Testing and your Location Requirements, as applicable.

Confidentiality

Refer to the *Standard for Privacy of Personal Information*.