



Policy Name: UK Alcohol and Drug Location Requirements

Policy Number: HR349B
Policy Approver: GM Human Resources - UK
Policy Owner: HSE & Assurance Manager
Approval Date: December 15, 2014

Policy Statement:

The Company will utilize these Location Requirements along with the Policy to ensure the safety of Employees and the safety of those affected by Company Business.

1. Definitions:

Undefined capitalized terms used in these Location Requirements have the meanings set out in the Policy.

BAC - means blood alcohol concentration or blood alcohol content.

Contractor Requirements - means the Company's UK Alcohol and Drug Contractor Requirements (as may be updated or replaced from time to time).

Location Requirements - means these UK Alcohol and Drug Location Requirements (as may be updated or replaced from time to time).

Other Substance - means any substance (other than Drugs, Alcohol or Medication) which, on human consumption, produces the same or similar effects as is produced by the consumption of any Drugs and/or Alcohol.

Policy - The Company's HR249 Alcohol & Drug Policy, including the associated COPs, (as may be updated or replaced from time to time).

UK Company Premises - means any Company Premises in the UK, which for the avoidance of doubt and without limitation, includes heliports used by the Company for departure offshore.

UK Guidelines - means the UK Laboratory Guidelines for Legally Defensible Workplace Drug Tests (as may be updated or replaced from time to time)

2. Objectives:

The objective of these Location Requirements is to ensure the safety of all workers, the public and the environment and to minimize the risk of unsafe performance by Employees due to the use of Alcohol, Drugs and Medications.

3. Persons Affected:

These Location Requirements apply to all Employees engaged in Company Business in the UK or working on UK Company Premises. Full details on the expectations and procedures can be found in the Policy and should be reviewed by all Employees.



Contractors engaged in the UK or by a Nexen UK company or working on UK Company Premises, as individuals or as an organization, will be advised of the Policy, these Location Requirements and the Contractor Requirements and must have policies or programs which have standards at least as stringent as the Policy and these Location Requirements and must agree to be subject to and comply with the Contractor Requirements.

4. Policy:

These Location Requirements sets out specific requirements in addition to the Policy and should be read in conjunction with the remainder of the Policy.

5. Heliport Searches:

Searches will routinely be carried out at the heliport prior to departure offshore. This may involve the use of specialist Drug search dogs.

6. Loss of Licence / Impaired Driving Charge:

All Employees who operate a motor vehicle on behalf of the Company are required to maintain a valid driver's licence. Any loss of licence must be reported to the Employee's supervisor, and the Employee will no longer be qualified to drive on behalf of the Company.

Employees must inform their supervisor immediately if they have been charged with an impaired driving offence when operating a Company vehicle or driving on behalf of the Company. Impaired driving would include, but would not be restricted to, driving whilst having a blood alcohol level over the legal BAC for driving in the relevant jurisdiction, or refusal to provide a sample for analysis in connection with a suspected driving offence. In these circumstances, receipt of a charge is a violation of the Policy. Failure to report the charge will be grounds for corrective action up to and including termination of employment.

7. Alcohol and Drug Cut-Off Levels:

7.1 Panel of Drugs and Cut-Off Levels

A positive Drug Test is a Test that is at or above the cut-off levels established by the UK Guidelines. These values may change with time but cut-off levels, effective at the date of these Location Requirements are as follows:

Drug/Classes of Drugs	Screening concentration equal to/in excess of ng/ml*	Confirmation concentration equal to/in excess of ng/ml*
Amphetamines Group Methamphetamine Amphetamine MDA MDMA MDEA	300	200 200 200 200 200
Benzodiazepines Group Temazepam/Oxazepam/Desmethyldiazepam	200	100
Cannabis/Marijuana Metabolites 11 THC metabolite	50	15
Cocaine Metabolites Benzoylecgonine	300	150
Opiates Total Morphine Codeine Dihydrocodeine 6 MAM	300	300 300 300 10
Methadone or metabolites	300	250
*A ng/ml means nanograms per millilitre. A nanogram is one billionth of a gram. A millilitre is one thousandth of a litre.		

7.2 Breath Alcohol Cut-Off Levels

A positive Alcohol Test is a Test in which the BAC is at or above 0.02% BAC (20 milligrams of alcohol per 100 millilitres of blood) for those holding SSPs or working at a SSWL, and at or above 0.04% BAC (40 milligrams of alcohol per 100 millilitres of blood) for all other Employees provided that for those not holding SSPs and not working at a SSWL:

- In those instances where an Employee is subject to an unannounced testing program on return to duty after a violation or treatment, a positive Test will be one in which the blood alcohol concentration is 0.02% BAC (20 milligrams of alcohol per 100 millilitres of blood) or more; and

- In other instances, where a Test results in a BAC of between 0.02% and 0.039% (between 20 and 39 milligrams of alcohol per 100 millilitres of blood), the Employee will be required to complete a Fitness for Work assessment prior to returning to work.

8. Pre-Access Testing:

All Employees working at a SSWL must complete a pre-access Alcohol Test and Drug Test prior to their initial access to the SSWL and prior to their return to work if they are absent for 90 days or more (**Pre-Access Testing**).

Pre-Access Testing will be done by urine laboratory based Testing.

Employees who will be working at a SSWL must have received a negative Pre-Access Test as a condition of employment no more than 90 days prior to arriving at the SSWL.

Visitors to a SSWL that are both hosted and escorted by an Employee working at the SSWL will be exempt from Pre-Access Testing.

9. Random Testing:

The Company retains the ability to conduct random Alcohol and Drug Testing of those personnel who work in SSPs and at SSWLs. Testing will take place on an unannounced basis, spread evenly throughout the year, with selection of those to be tested handled by an independent qualified third party administrator.

10. UK Safety Sensitive Work Locations:

The following sites are designated as SSWLs for the purposes of the Policy and these Location Requirements:

10.1 all UK offshore sites;

10.2 all onshore construction sites under the control of a Nexen UK company, and

10.3 all other sites identified and designated as such in accordance with the Policy.

11. UK Safety Sensitive Positions:

The following positions are designated as SSPs for the purposes of the Policy and these Location Requirements:

11.1 all UK offshore positions

11.2 the emergency response duty manager, and

11.3 all other positions identified and designated as such in accordance with the Policy.

12. Testing Procedures:

The Alcohol and Drug Testing procedures are based on rigorous collection, analysis and reporting processes to be conducted in accordance with standards established by the UK Guidelines to ensure the accuracy and integrity of the results.

12.1 Testing will be conducted to determine the presence of Alcohol and/or Drugs as listed in sections 7.1 and 7.2 of these Location Requirements. These levels may be updated from time to time.

12.2 All Employees who are Tested are required to sign a form to acknowledge the accuracy of the individual and collector information and authenticity of the specimen(s). They will be given a copy of the appropriate forms for their records.

12.3 Employees are required to cooperate in the specimen collection procedures and to sign a release such that the results and their name can be provided to the appropriate DER.

12.4 All laboratory Testing must be conducted in accordance with the procedures set out under the UK Guidelines. The Company's third party testing provider maintains an account at a fully qualified and accredited laboratory.

12.5 Urine and breathalyzer collections are administered by certified or trained collectors.

12.6 Alcohol Testing

12.6.1 Alcohol Tests will be administered by a calibrated breath analyser. Only in those situations when a breath analyser is not readily available will Alcohol Testing be done with a saliva strip.

12.6.2 A positive Alcohol Test may be confirmed by a second breath test, a urine test, or a voluntary blood test.

12.7 Drug Testing

12.7.1 Drug Tests will be administered by urinalysis.

12.7.2 Testing for additional Drugs may also be required on an individualized basis on the advice of a treatment centre or SAP/SAE in return to work and unannounced follow-up Testing situations following treatment for substance dependence disorder.

12.7.3 For all Tests, controlled samples are sent for confirmation testing at a laboratory. All results are forwarded to a MRO for review.

12.7.4 If the Test is negative in accordance with the concentration limits for Drug Testing established in section 7.1 and there is no evidence of tampering with or substitution of the sample, the Employee may return to or remain at work, as the case may be.

12.7.5 In the case of a positive Drug Test result or where there is evidence of a substituted finding or that a sample was tampered with, the Employee may ask the MRO to have the sample re-Tested within seventy-two hours of receiving the initial Test results. If the re-Test is positive, or where there is evidence of a substituted finding or that the sample was tampered with, the Employee is responsible for reimbursing the Company for the associated costs of the re-Testing.

	Pre-Access	Reasonable Grounds	Post Incident	Return to Work
Urine Laboratory urine specimen is sent directly to laboratory	YES	YES	YES	YES
POCT	NO	YES	YES	NO

13. Other Substances:

Employees are prohibited from consuming Other Substances when performing Company Business or on UK Company Premises.

Employees who have consumed any Other Substance which could affect their ability to perform their duties safely and acceptably or which could otherwise render them not fit for work must notify their Supervisor/Manager or the Company's occupational health services department who may make reasonable inquiries to determine if an individual is fit for work.

14. Exceptions:

The following exceptions supplement the permitted uses of Alcohol contained in COP-05 of the Policy (and in the event of inconsistency, these Location Requirements will prevail):

- 14.1** sealed containers of Alcohol may be stored in vehicles parked on UK Company Premises provided they are locked in the boot of the vehicles or otherwise appropriately secured and out of sight from outside the vehicles;
- 14.2** Alcohol may be permitted at certain Company-owned residential facilities with prior approval of senior management of the relevant division; and
- 14.3** Employees may consume Alcohol whilst on travel status, at a training event or seminar or in any other similar business-related situation (including work related social events), provided that:
 - 14.3.1** the formal business or training has been concluded;
 - 14.3.2** alcohol is consumed responsibly;
 - 14.3.3** the Employees are not required to return to work immediately after the event; and



14.3.4 the Employees are able to report to work, as and when required by their job requirements, in a state that is Fit for Work in compliance with the standards set out in the Policy and these Location Requirements.

If Alcohol is made available to Company Employees or guests in the course of conducting Company business (for example at restaurant meetings), Employees are expected to use judgment and be responsible in hosting others while complying with the Policy and these Location Requirements.

The above exceptions and any exceptions in the Policy for use of Alcohol shall not apply to SSPs or SSWLs. Employees shall refrain from consuming Alcohol at least 24 hours prior to departure for an SSWL or being on duty or on call as an SSP.

15. Compliance:

Failure to comply with these Location Requirements may be grounds for Corrective Action up to and including termination of employment for cause.

16. Deviations:

Location Requirements deviations must be approved by the HSE & Assurance Manager and then authorized by the GM Human Resources – UK for consistency of application of the Policy.

17. Revision History:

DATE	REVISION #	DESCRIPTION OF CHANGE
December 15, 2014	Policy Re-write	Policy changed to comply with revised HR249
November 10, 2009	Policy Issuance	Policy issued for use in the UK (Policy # ECN-HS-STD-00064)