



PROMAN ENERGY SUBSTANCE MISUSE POLICY

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1. GENERAL INFORMATION

PROMAN ENERGY

Proman Energy is an energy company focused on meeting the energy needs of Trinidad and Tobago. Proman Energy is the owner of Block 1(a) located offshore in the west coast of Trinidad. Proman Energy currently produces natural gas from the Iguana and Zandolie fields in Block 1(a) with two (2) unmanned platforms and a 45km pipeline to Proman Energy's Gas Processing Unit which is located onshore.

2. STATEMENT OF POLICY

Proman Energy Energy Limited is committed to maintaining a safe work environment with zero harm to our employees, our service providers, and visitors. To achieve this objective, the company has adopted a zero-tolerance approach to substance misuse in the workplace. Substance misuse is an issue of widespread global concern. Substances of misuse include alcohol, illicit drugs, inappropriate use of over the counter and prescription medicines and other substances that have the potential to impair health, behaviour, judgement, or job performance. Proman Energy recognises that its safety, reputation, and financial performance can be put at risk by a person or persons whose judgement has been impaired by substance misuse.

This policy outlines the Proman Energy's approach to manage the risks associated with substance misuse in the workplace and communicate the company's expectations.

3. SCOPE

- This policy is applicable to all Proman Energy employees, board members, service providers and visitors to any company's site.
- The terms of this policy shall constitute conditions of employment (pre-employment and continued employment).
- The treatment programmes will only apply to Proman Energy employees and nested contractors.

4. ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES
Supervisor/Manager	<p>Understands, complies with, and applies this Procedure.</p> <p>Ensures employees have completed training and education regarding this Procedure</p> <p>Understands the important role of the EAP in helping employees with substance abuse disorders Participates in Reasonable Suspicion training, where required.</p> <p>Reports Under the Influence issues to Manager HSSE and Managers responsible for HR matters.</p> <p>Documents observations on the Reasonable Suspicion Checklist, prior to Reasonable Suspicion testing.</p> <p>Relieves personnel of duty after a Post-incident or a Reasonable Suspicion test.</p>
Collector/ Alcohol Technician	<p>Participates in drug collection and alcohol technician training and maintains valid certification.</p> <p>Obtains signed consent prior to administering drug and alcohol tests Calibrates alcohol testing equipment.</p> <p>Conducts drug testing and breath alcohol tests using approved testing equipment and methods and follows approved chain of custody processes.</p>
Medical review officer	<p>Reviews laboratory Positive Test Results and evaluates medical explanations provided by the donor.</p> <p>Nominates an independent certified laboratory, for donors requesting an independent test, to have the split sample re-evaluated at donor's cost and within 24 hours of notification of result.</p>
Employees and service providers	<p>Presents for work not Under the Influence and remain that way Understands and complies with this policy.</p> <p>Utilises EAP services proactively for substance abuse issues Participates in drug and alcohol education and training programmes.</p> <p>Ensures use of over the counter and prescription medication is within the guidelines recommended by the treating physician/pharmacy.</p> <p>Participates in searches and tests as required by this policy.</p>



Participates in local drug and alcohol testing programmes, at the host Proman Energy location, when on business travel, as required.

Participates in contractor's drug and alcohol testing programme, when at contractor operated facilities, as required.

Reports any fitness for work/Under the Influence related risks or concerns regarding themselves or others.

Cooperates in an investigation into violations of this policy.

5. WHAT IS PROHIBITED

The following activities are prohibited because they are not consistent with providing and maintaining a safe and healthy workplace and are violations of this policy. Individuals engaging in the following activities will be subject to disciplinary action that may include support and referral for treatment or disciplinary action up to, and including, termination of employment for employees, and removal from the site for all other personnel.

- Testing positive for Unlawful or Unauthorised Substances.
- Reporting to work or working while Under the Influence.
- Engaging in work at any Proman Energy site or performing work-related activities, when Under the Influence of Unlawful or Unauthorised Substances. This includes employees and service providers who have operational responsibilities away from Company Sites.
- Refusing to provide a sample as part of a drug and/or alcohol test required by this Policy.
- The use, possession, consumption, delivery, distribution, exchange, manufacture, purchase, sale, or transfer of: Unlawful or Unauthorised Substances on Company Sites or while working on behalf of Proman Energy.
- The unauthorised use, possession, consumption, delivery, distribution, exchange, manufacturing, purchasing, sale, or transfer of alcohol while on Company Sites or while working on behalf of Proman Energy.
 - At management's discretion, alcohol may be available at Company functions. Employees and service providers who choose to consume alcohol at a Company function shall be responsible for limiting their consumption so as not to present a danger to themselves or others.
- Excessive or recreational use of over-the-counter medication or prescription drugs while on Company Sites or while working on behalf of Proman Energy.
- Misuse of prescription drugs, which includes, but is not limited to, taking an expired prescription, taking someone else's prescribed medication, or exceeding the recommended dosage or frequency.
- Misuse of over-the-counter medication, which includes, but is not limited to, exceeding the recommended dosage or frequency.
- Failure to disclose over-the-counter medication or prescription drugs that may affect the ability to safely perform work.
- Refusing to submit to a search of one's person and/or possessions on Proman Energy Sites.
- Refusing to cooperate in any investigation regarding the use or presence of drugs or alcohol, including cooperating with a search or inspection.
- Failing to adhere to the drug and/or alcohol sample collection procedures or engaging in conduct that obstructs or tampers with the testing process.
- Any attempt to adulterate or substitute the sample or notification from the laboratory of an adulterated or substituted sample will be treated as a refusal to test.
- Failure to appear at the testing facility within the time frame prescribed by the company representative.
- Refusing to participate in any treatment or rehabilitation programme.

6. SEARCHES / INSPECTIONS

Proman Energy will conduct inspections/searches to the extent necessary to ensure compliance with this Policy.

- Proman Energy reserves the right to conduct searches of any person, vehicle, personal property or equipment, or any other item on Proman Energy premises or in any Proman Energy vehicle for unlawful or unauthorised substances.
- Entry onto a Proman Energy site is deemed as consent to an inspection/search upon entry or departure of a Proman Energy site.
- When there is reasonable suspicion, unannounced searches of personnel, their possessions, or Proman Energy premises for unlawful or unauthorised substances will be conducted.
- Inspections may include the use of law enforcement personnel and drug sniffing canines. Any suspected unlawful substance found during a search may be turned over to the appropriate law enforcement agency and may result in the criminal prosecution of the individuals involved.
- Inspections of an employee's personal effects will be conducted in the presence of the employee when possible.
- **If** inspection or chance discovery of prohibited substances or contraband is directly associated with a service provider employee, the individual will immediately be escorted off Proman Energy's site and notification sent to his/her employer.
- **If** inspection or chance discovery of prohibited substances or contraband cannot be directly associated with an individual employee or service provider but can be associated with a defined group comprising employees, employees and service providers e.g. a group of people who occupy the same office), Proman Energy will conduct, an inspection of the group's clothing, wallets, purses, baggage, lockers, work areas, desks, tool boxes and vehicles, etc. and conduct unannounced testing of the group.
- Any searches of personnel will be conducted with the consent of the individual being searched and will be witnessed by at least one person.
- An individual from whom suspected unlawful or unauthorised substances have been taken will not be involuntarily detained at Proman Energy's onshore premises. However, an individual from whom suspected unlawful or unauthorised substances have been taken at Proman Energy's offshore premises will be asked to remain restricted to common areas until transportation to shore has been arranged, or until Proman Energy determines that the individual may remain onboard the offshore facility.

7. TESTING

All Proman Energy employees, prospective employees and service providers are required to submit to drug and alcohol testing when directed, at the company's medical provider or onsite designated locations.

All donors shall present one form of national identification to the laboratory or collector.

7.1 TYPES OF TESTING

Testing will be conducted by Proman Energy under the following circumstances.

TEST TYPE	GENERAL REQUIREMENT
Pre-employment	All prospective employees shall be required to undergo a pre-employment drug test. This drug test shall be performed after a conditional offer of employment and prior to employment. Employment is conditional on the outcome of the test and depending on the circumstances, may result in the offer of employment being revoked. Refusal to submit to a pre-employment test will result in the applicant no longer being considered for employment.
Site Access	Prior to the performance of work by employees and service providers as deemed appropriate by the Company.
Random	Randomly for all employees and service providers. The minimum annual drug and alcohol random testing rate is 25%. Everyone in the testing pool has an equal chance of being tested and the workforce does not know who will be tested, how often or when.
Unannounced Group Testing	Unannounced group testing of employees and/or service providers may be required without notice for a group on Proman Energy's sites, based on evidence of prohibited substances or contraband. Group testing should be limited to those personnel considered most likely to be affected.
Sweep	Sweeps at a given location, or en-route to a Company Site, will test all employees, service providers and visitors and will not single out a person or group.
Reasonable Cause or Reasonable Suspicion	If an employee or service provider exhibits signs and symptoms of drug or alcohol misuse in the workplace, it is advisable to carry out reasonable suspicion testing.
Post- Incident	Post-incident testing may be conducted: Where it is believed that an individual's performance or behaviour either contributed to or it cannot be discounted in situations that drugs and/or alcohol may have been a contributing factor in an incident. In situations where there has been a Significant Event.

	There is a requirement to be tested under local legislation.
	The individual must be relieved of duty pending the outcome of the test result.
Return to duty	Follow-up testing may be required to confirm any employee's substance free status prior to their return to work for a substance misuse disorder, upon disclosure of a substance misuse issue, or after engaging in a prohibited activity.
Rehabilitation follow-up	This involves ongoing unannounced testing of an employee in the workplace after they have returned to work following treatment. A rehabilitation agreement prepared by the employer and agreed to by the employee will usually dictate how long this type of testing will continue.

7.2 PROCEDURES FOR TESTING: CONSENT/REFUSAL

All personnel, including but not limited to, prospective employees, employees, and service providers will be required to sign a "consent and release form" in advance of any drug and alcohol test. The form provides authorisation for test results to be forwarded to Proman Energy.

- Any prospective employees who refuse to sign the consent form or submit to a test shall result in denial of employment.
- Any service provider who refuses to sign such form or to submit to such test, will not be allowed to provide further services to Proman Energy.
- An employee who refuses to sign such form or to submit to such test will be in violation of this Policy and will be subject to disciplinary action, up to and including termination of employment.
- Test results that demonstrate a specimen has been adulterated or substituted, or observation of Personnel attempting to adulterate or substitute a specimen, will be deemed to be a refusal to test.

7.3 METHOD OF SAMPLE COLLECTIONS

- Collection/testing will be performed by a trained and certified Collector/Alcohol Technician.
- Proman Energy will utilise an Evidentiary Breath Testing (EBT) device for breath testing to determine blood alcohol content.
- Lab based testing of urine or oral fluid.
- A split-sampling method of collection will be conducted for all urine specimens collected that are to be tested for unlawful or unauthorised substances. The specimen is collected by following proper collection procedures and poured into two (2) bottles that are sealed and sent to the laboratory. One sample is tested, and the other sample is placed in frozen storage.

7.4 SPECIMEN TYPE

Proman Energy may use urine, hair, and oral fluid for drug testing specimens.

7.5 CHAIN OF CUSTODY

- Chain of custody forms shall be prepared by the designated lab collector to establish correct identification of samples, including those from follow-up testing.
- Chain of custody forms and documentation of refusal to take a drug test shall be placed on the employee's file and retained for twenty-five (25) years, unless there is an open query/issue which requires retention of the documents for longer.
- Chain of custody forms and documentation of refusal to take a drug test shall be retained by HSSE for twenty-five (25) years for service providers, unless there is an open query/issue which requires retention of the chain of custody forms for longer.

7.6 REQUIREMENTS FOR TESTING LOCATION

- The on-site test location or mobile unit must be adequately secured, sanitary and provide individual privacy during drug testing.
- HSSE shall inspect the designated location and its facilities or mobile unit for cleanliness, adequate running water, hand washing soap, napkins, functional washroom(s) and toilet paper.
- For random drug testing, HSSE shall complete an assessment of the washrooms at the on-site test location prior to the start of testing.
- Security arrangements will be made, as required, for drug testing events on site.



8. DRUG TESTING PANEL AND CUT OFFS

Proman Energy's medical provider shall perform specimen analysis in a nationally certified laboratory with their testing conducted in accordance with relevant international standards and local legislation. Proman Energy has adopted the IOGP report 575 recommended 14-point drug testing panel and cut off concentrations.

9. ALCOHOL TESTING

Alcohol tests will be conducted when drug testing is done. Alcohol tests may, however, be a breath, blood, urine, or saliva test, at the company's discretion.

If an employee or service provider's breath alcohol concentration (BAC) is greater than or equal to 0.02 g/210 L, a confirmation test is needed, a second breath specimen will be tested between 15-30mins later. The results of the second test will be determinative.

Blood specimens for ethanol (alcohol) will be tested using a validated gas chromatographic confirmation method with a cut-off of at least 0.020 g/dl (i.e., 20 mg/dl).

9.1 MANAGEMENT OF TEST RESULTS

Employees and service providers who have a laboratory confirmed Positive test result will be given the opportunity to discuss the results with a third-party, a medical review officer (MRO).

- After speaking with the individual and reviewing documentation, the MRO will determine if the individual has a justifiable explanation (e.g., valid prescription) for the drug test result; or the MRO will report the result to a Proman Energy representative as a Positive Test Result.
- All split specimen-B samples shall be properly stored by Proman Energy's Medical Provider until the drug test review of employees have been completed.

NB: Taking someone else's prescribed medication is prohibited under this policy.

- If the MRO determines there is a justifiable explanation, then a negative test result will be recorded by the Proman Energy's medical provider, and the Company will not have any knowledge of the confidential discussion between the individual and the MRO. If there is not a justifiable explanation as determined by the MRO, the MRO will communicate the Positive Test Result to Proman Energy's Manager, HSSE.
- Individuals with a verified Positive Test Result (non-justifiable) under this policy shall, in accordance with applicable laws, be subject to the following consequences:
 - Applicants may have their conditional offer of employment revoked.
 - Service providers will be removed from Company sites.
 - Employees will be referred to the Employee Assistance Programme (EAP) or another medical service provider, and/or may be required to enter an external treatment programme and/or enrolled in a follow-up testing programme. If the employee refuses to accept such a referral or to cooperate in a treatment programme recommended by the EAP, the employee shall be dismissed from employment.
 - Employees will be subject to disciplinary action up to, and including, termination of employment.
- If an employee has received treatment through the EAP and tests positive for any unlawful or unauthorised substance during the treatment or monitoring period, or at any time thereafter, the employee shall be dismissed from employment.

9.2 REQUESTS FOR INDEPENDENT TESTING

Within 24 hours of notification of a Positive Test Result, employees and service providers who test positive for drugs may request, at their own cost and through the MRO, to have their original (split) sample re-evaluated by an independent certified laboratory nominated by the MRO. A request by employees and service providers to have their sample re-evaluated by one of these laboratories will not prevent the Company from taking disciplinary action or removing the individual from the site.

9.3 PRESCRIPTION DRUGS AND OTHER MEDICATION

To protect individuals' medical confidentiality, Proman Energy does not require individuals to disclose over-the-counter medication or prescription drugs unless one of the following situations apply:

- The medication may affect the individual's ability to safely perform work (i.e., some medications warn of drowsiness or caution regarding the operation of a motor vehicle or machinery).
- The medication may influence first aid and emergency response (e.g., anti-coagulants can lead to significant blood loss in the event of injury).
- Point of collection devices are used, and a non-Negative test result is reported. In these situations, the individual may be prompted to document medications on the chain of custody form.
- Upon disclosure of medication, individuals are not required to disclose their diagnosis or medical history to their Supervisor or other non-medical professional.

In support of our efforts to ensure individuals are fit for work, disclosure of medication may be required in the following situations:

- During baseline and periodic Company medical examinations.
- During injury/illness treatment and case management.
- Upon arrival at an offshore facility, there may be a requirement to disclose medication that could affect an individual's ability to safely perform their duties to the onsite Medic.

9.4 NON-OPERATED PROMAN ENERGY FACILITIES

For certain activities (drilling campaigns, seismic surveys, pipelay etc.), Proman Energy employees may work at contractor operated facilities under the contractor's management system, including the contractor's drug and alcohol procedure. In these situations, Proman Energy employees and contractors may be subject to the contractor's drug and alcohol testing programme, including but not limited to, the contractor's drug testing panel, testing methods, and frequency, for the duration of the work activity.

9.5 OFF THE JOB ACCOUNT

- An individual's off-the-job use of unlawful or unauthorised substances which adversely affects job performance or jeopardises the safety and security of others while conducting Proman Energy business or on Proman Energy premises shall be considered a violation of this Policy.
- Service providers whose off-the-job use of unlawful or unauthorised substances adversely affects job performance or jeopardises the safety and security of others while conducting Proman Energy business or on Proman Energy premises shall be removed from premises.
- An employee whose off-the-job use of unlawful or unauthorised substances adversely affects job performance or jeopardises the safety and security of others while conducting Proman Energy business or on Proman Energy premises maybe referred to the EAP and/or face disciplinary actions, up to and including dismissal.
- For purposes of this policy, test results generated by law enforcement, or their authorised medical providers may be considered as violation of company policies.

10. EMPLOYEE ASSISTANCE PROGRAMME (EAP)/ REHABILITATION

- Any employee testing positive on a prohibited substance test will be referred to the Proman Energy's EAP provider for a clinical assessment and determination on whether rehabilitation is necessary.
- Employees are required to follow any recommended rehabilitation programme as a condition of continued employment including prohibited substance testing in addition to testing otherwise required by this policy.
- All discussions with the EAP are confidential and will not become part of an employee's employment file but will become part of the employee's confidential file maintained by Proman Energy (or the applicable medical service provider).
- Counsellors and physicians will discuss an employee's substance use with management only to the extent necessary to ensure workplace and employee safety or if required by law.
 - If employee needs time off from work for treatment or is unfit to return to unrestricted duty following treatment, Proman Energy's EAP will consult with Proman Energy's authorised medical provider, who will advise management of medical restrictions or need for a medical leave, not revealing the reason for such actions.

11. DISCIPLINARY IMPLICATIONS

Any employee who violates this policy, including but not limited to a positive unauthorised substance test result, is subject to discipline, up to and including termination of employment.

- Employment will be terminated for any employee who tests positive a second time for authorised substances on any test.
- Disciplinary action related to other violations will be determined by the relevant line manager and may include a required rehabilitation program as a condition of continued employment.
- This policy does not vitiate any prior discipline or prior positive prohibited substance test received by an employee under any other policy.

12. LAW ENFORCEMENT

12.1 CONVICTION FOR SALE OR USE OF ILLEGAL SUBSTANCES

- Any employee convicted of, or guilty of or pleads no contest to, for the use, sale, or possession of any unlawful or unauthorised substances off duty will be considered a violation of this Policy.
- Any conviction while off duty reflects adversely on the company's reputation and such conduct will not be tolerated. The employee will be subject to disciplinary action up to and including termination.
- Any conviction on a charge of being under the influence of alcohol while conducting company business, in the company vehicles shall result in the termination of the employee.
- Any service provider employee, convicted of, guilty of or pleads no contest to, for the use, sale or possession of any unlawful or unauthorised substances off duty will be considered a violation of this Policy and the terms of their agreement with Proman Energy. The service provider has an obligation to notify Proman Energy of this development and to make arrangements for said employee to be replaced.

12.2 COORDINATION WITH LAW ENFORCEMENT AGENCIES

- The sale, use, purchase, transfer, or possession of unlawful or unauthorised substances is a violation of the laws of Trinidad and Tobago. Proman Energy will report to law enforcement any information concerning the possession, distribution, or the use of any unlawful or unauthorised substances by any employee or service provider.
- Proman Energy reserves the right to seek law enforcement support and/or assistance to conduct searches where there is reasonable suspicion that an employee or service provider is under the influence, using or in possession of unlawful or unauthorised substances at company sites.
- Proman Energy will cooperate fully with law enforcement in any investigation, prosecution and/or conviction for any violation of the law.

13. SERVICE PROVIDERS AND CONSULTANTS

- All service providers are required to have a substance abuse policy no less stringent than Proman Energy's Policy before commencing work. If the policy is inconsistent with Proman Energy's policy, the service provider is required to agree that all employees and representatives will to be subject to searches and testing under Proman Energy's Policy.
- Service providers shall notify their employees of Proman Energy's zero tolerance approach to substance misuse/abuse and their obligation to comply with Proman Energy's policy to work on Proman Energy sites.
- These policies will be audited annually by Proman Energy's HSSE department.

14. TRAINING

- Training will be made available for all employees.
- Managers and supervisors will receive specialised training on their responsibilities under this policy to include identification of signs indicating the appropriateness of reasonable suspicion testing.
 - Managers and supervisors also are obligated to seek the requisite training to ensure they are able to execute their functions under this policy.
- **All** employees will receive appropriate substance misuse/abuse awareness training as well as information concerning their obligations under this policy.

15. CONFIDENTIALITY OF RECORDS

- All records pertaining to substance abuse testing of personnel and their treatment or rehabilitation shall be treated and kept confidential in the manner consistent with handling personnel medical records.
- Such records maybe disclosed to managers and supervisors on a need-to-know basis. It may also be disclosed when relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an employee.
- Upon written request employees/service providers will be furnished with a copy of their test results.

16. ADMINISTRATION AND ENFORCEMENT

- The Designated Proman Energy Human Resources representative is responsible for the interpretation, administration, and enforcement of this policy.
- Proman Energy retains the sole right and discretion to interpret, revise, or withdraw this policy at any time.
- The provisions of this policy will be applied in accordance with the laws of Trinidad and Tobago.
- This policy is not intended to create, nor does it create any express or implied contract rights in any person.
- This policy does not modify or limit any employee's "at will" employment with Proman Energy; whereby the employee or company may terminate its relationship at any time with or without cause or with or without notice.
- This Policy does not expand or contract the rights or obligations contained in any contract with a service provider.
- This policy will be reviewed annually.