



Alcohol and Drug Instruction

CCCC – Corporate Sustainability Department

Rev.: 01-01/01/2010

No. INS-BBBB

For All Employees

Responsible Person: Human Resources, Sustainability, Legal	Training Code: Insert the relevant training code (if applicable). Note that completing this field is optional.
Target Audience: All Canadian Sites and Operations	Key words: alcohol, drug, addiction, testing, medication, rehabilitation, aftercare

Purpose:

- The Company, (including all subsidiaries), is committed to be an industry leader and to protect the health and safety of its employees and contractors, and protect the environment of the communities in which the Company operates. Health, safety and environmental performance relies on good judgment and precise action. The Company recognizes that its employees and contract workers are operating in a safety sensitive work environment.
- It is well understood that the use of illicit drugs and the inappropriate use of alcohol or medications can adversely affect the safety and well being of employees, the work environment, and job performance. It can also place the integrity and safety of Company facilities and operations at risk. The Company has a legislative duty to prevent individuals who are under the influence of drugs, narcotic substances or alcohol from entering a mine or mining plant.
- This instruction is being implemented as a key component of the Company's SHE Management System and in recognition of its legal obligations. It is consistent with the Company's Vision, Mission and Values which support providing safe and rewarding work environments that contribute to personal growth for employees, and positively contributing to social, environmental and economic well-being in the communities where the Company operates.

Scope:

- This instruction applies to all employees:
 - while they are engaged in Company business in Canada;
 - at all times when on Company premises and property in Canada; or
 - when operating Company vehicles and equipment in Canada.
- Any violation of these provisions will result in disciplinary action up to and including termination of employment. Failure of supervisors to meet their additional responsibilities under this instruction will be grounds for disciplinary action.
- All contractors will be advised of the applicable provisions of this instruction, and will be expected to enforce these requirements for their employees, sub-contractors and agents. Any contravention of this instruction will be considered a breach of contract. Specific requirements for contractors are set out in the Company's "Alcohol and Drug Instruction - Expectations for Contractors".

References:

- Document number – Alcohol and Drug Instruction - Expectations for Contractors

Definitions:

Company Business: refers to all business activities undertaken by employees in the course of the Company's operations, whether conducted on or off Company premises.

Company Premises: includes but is not necessarily restricted to all land, facilities, work sites, and vehicles owned, leased or otherwise controlled by Vale for the purpose of conducting Company business.

Contractor: refers to any company or individual, which Vale has contracted to perform a service on Vale premises or as a representative of Vale.

- Drug:** means any substance, including but not limited to alcohol, illicit drugs, medications, or other substances the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this instruction, drugs of concern are those that inhibit a worker's ability to perform his or her job safely and productively.
- **Alcohol:** refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.
 - **Illicit Drug:** means any drug or substance which is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs such as marijuana and cocaine).
 - **Medication:** refers to a drug obtained legally, either over-the-counter or through a doctor's prescription.
- Drug Paraphernalia:** Any personal property which is associated with the use of any drug, substance, chemical or agent, the possession of which is unlawful in Canada. This would also include any product or device that may be used to attempt to tamper with a testing sample.
- Employee:** includes all regular full time, part time, temporary, casual and seasonal employees on the Vale payroll.
- Fitness for Work:** in the context of this instruction means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of alcohol, illicit drugs, medications or other substances.
- Scheduled On-Call:** A scheduled on-call is a period of time in which an employee is aware, in advance, that the employee is to hold himself/herself available to be called in to duties on short notice.
- Substance Abuse Professional (SAP):**
This is an individual with knowledge of and clinical experience in the diagnosis and treatment of alcohol and drug related disorders. The SAP will assess if the employee has an alcohol or drug dependency, make recommendations regarding education and treatment, and recommend a return-to-work monitoring program including unannounced testing.
- Supervisor:** refers to an employee accountable for a particular area or shift, including managers, and others in supervisory positions who are directly responsible for the performance of others.
- Test:** in the context of this instruction is a test for presence of alcohol and a test for presence of drugs.

A - Standards:

1. **Fitness at work:** To minimize the risk of unsafe and unsatisfactory performance due to the use of alcohol or other drugs, employees are required to comply with the following standards, and to report fit and remain fit for work throughout their work day or shift.
2. **Illicit Drugs:** The following are prohibited while on Company business, premises, or property:
 - a. the use, possession, cultivation, manufacture, distribution, offering or sale of illicit drugs or illicit drug paraphernalia;
 - b. reporting to work or being at work while under the influence of illicit drugs; or
 - c. a positive drug test as determined through the testing program.
3. **Alcohol:**
 - a. The use, possession, distribution, offering or sale of beverage alcohol is prohibited when on all Company business, premises, and property consistent with the dry site rules and industry regulations. In addition, employees cannot:
 - i. report for work or remain at work under the influence of alcohol from any source;
 - ii. consume any product containing alcohol (including beverage alcohol) when on duty/during the work day including during meals or breaks;



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- iii. return to work or report for work after consuming alcohol at a social event (whether sponsored by the Company or not);
 - iv. have a positive test result as determined through the testing program; and
 - v. use alcohol after an incident until tested or advised testing is not required.
- b. Employees may use alcohol after the work day when off-site, for example, when on travel status, when at a training event or seminar, or in any other similar business-related situation, provided the formal business has been completed, alcohol is used responsibly, and the employee is not expecting to return to work.
- c. Alcohol use or possession is permitted at off-site residential facilities unless specifically prohibited by site management.
4. **Medications:** Employees are expected to responsibly use prescribed and over-the-counter medications. Medications of concern are those that inhibit or may inhibit an employee's ability to perform their job safely and productively. A guideline on medications is found in Appendix 1.
- a. The following are prohibited while on Company business, premises and property:
 - i. the intentional misuse of medications (*e.g. not using the medication as it has been prescribed or directed by the pharmacy, using someone else's prescription medication, combining medication and alcohol use against direction*); and
 - ii. the unauthorized possession of prescribed medications without a legally medically obtained prescription and unauthorized distribution, offering or sale of prescription medications (trafficking).
 - b. In the interest of health and safety, employees who require the use of a medication are expected to:
 - i. investigate (through their doctor or pharmacist, or appropriate Company medical staff) whether the medication can negatively affect safe performance; and
 - ii. act responsibly and use a safe alternative medication choice when available (*e.g. non-drowsy*); however
 - iii. if the medication they are using will affect their ability to operate safely, they are expected advise their supervisor of any need for modified duties.
- In this situation, a medical work modification may be issued, and the employee may be assigned to alternate duties if available and at the discretion of the Company. The Company reserves the right to confirm the nature and duration of any required work modification with the treating physician through the designated medical provider without any breach of medical confidentiality or privacy laws.
5. **Scheduled On-call Situations:** All employees scheduled on call are expected to remain fit to respond to a call-in and be in compliance with this instruction.
6. **Unexpected Call-in:** If an employee is under the influence of alcohol or other drugs and is contacted by the Company to perform unscheduled services, it is the responsibility of the employee to decline the opportunity to report to work.
7. **Hosting of Events :** Hosting of Business or Social events are to be conducted in accordance with the guidelines set out at Appendix 3.

B - Prevention, Assistance, Rehabilitation, Aftercare

1. **Prevention:** This instruction stresses the importance of prevention and early identification of potential problem situations. The Company will make information available on health and safety hazards, recognizing related performance problems, and the process to access assistance.

Employees are encouraged to access assistance through the Company Employee and Family Assistance Program (EFAP), their personal physician, or appropriate community services for help with any other problem that may be affecting safe work performance, including one related to alcohol and drug issues.

In addition, the normal process of job performance monitoring will continue to be emphasized. Through this process, individuals with apparent performance problems will be reminded that they should access assistance should a personal problem be affecting their job performance.

2. **Assessment/Rehabilitation:** The Company recognizes that alcohol and drug dependency are treatable illnesses and that early intervention greatly improves the probability of a lasting recovery. Anyone who suspects they have a substance dependency or emerging alcohol or drug problem is encouraged to seek advice and to follow appropriate treatment promptly before safe job performance is affected or violations of this instruction occur.

Where a medical professional, Substance Abuse Professional, or other counseling professional advises that there may be a risk that would prevent an employee from doing their normal job safely, a medical work modification may be issued and the employee may be assigned to alternate duties if available and at the discretion of the Company.

3. **Request for Assistance:** Employees who come forward voluntarily for help with an alcohol or drug problem will be referred for an assessment with a Substance Abuse Professional (SAP) and if applicable, according to employment status, supported through a treatment and aftercare program consistent with the SAP's recommendations and the applicable benefit coverage.
4. **Responsibilities:** Employees should understand that accessing assistance or declaring a problem does not eliminate the requirement for maintenance of safe and acceptable performance levels. Discipline and/or testing cannot be avoided by a request for assistance with a problem or by disclosure that the employee is already involved in a treatment program.
5. **Aftercare:** All employees who complete primary treatment (e.g. residential or out-patient treatment) for alcohol and/or drug problems will be required to participate in an aftercare program when returning to work in order to help them maintain recovery. They will be expected to enter into a written agreement which will outline the conditions governing their return to the job, and the consequences for failing to meet those conditions.
6. **Confidentiality:** will be maintained to the greatest extent possible except where limited disclosure is necessary for related health and safety concerns. (e.g. there is deemed to be a potential for risk to self, others or the Company). That is, only the information strictly limited to the level of functionality (e.g. fitness for work and any restrictions that may apply) may be shared as required for purposes of determining fitness for work, appropriate work accommodation, and/or compliance with work re-entry initiatives or conditions.

C – Investigation Processes

1. **Unfit for Work Situations - Employees:** In all situations when there are grounds to believe an employee is unfit to be on Company premises, the employee will be escorted by a supervisor to a safe place, interviewed, and given an opportunity to explain why they appear to be in a condition unfit for work. The employee should be able to provide a reasonable explanation for their behaviour or condition (unrelated to illicit drug and alcohol use), and the supervisor will take action appropriate to the situation.

If the explanation is not plausible, and/or the supervisor still believes the employee is in a condition unfit for normal work, the supervisor may take one of the following actions. The supervisor must first consult with another level of supervision or management or another appropriate resource as determined at each site:

- a. referral for medical attention if there are immediate medical concerns (health centre, local hospital or clinic); or
- b. make arrangements for an alcohol and drug test if there are reasonable grounds to believe alcohol or drug use may be a factor in the situation.

The employee will be provided with transportation and escorted to the collection site or hospital/clinic depending on the circumstances, and then transportation to their local place of residence or the care of another adult person. The employee may be temporarily removed from their duties or reassigned pending completion of any investigation.

2. **Unfit for Work Situations – Contract Workers:** If there are reasonable grounds to believe a contract worker is unfit for work, the worker will be removed to a safe place and an investigation will be undertaken as set out in the Expectations for Contractors.
3. **Alcohol and Drug Testing:** All employees will be subject to testing in the following circumstances:
 - a. **Reasonable Cause:** Testing will take place whenever a supervisor has directly observed out of character behaviour and has reasonable grounds to believe that the actions, appearance or conduct of an employee while at work or on Company premises are indicative of the use of alcohol

or drugs. The decision to test shall be made by a supervisor after consultation and agreement of a second level of supervision or management, or other appropriate resource. The basis for the decision will be documented as soon as possible after action has taken place. The referral for a test will be based on specific, personal observations resulting from, but not limited to such indicators as:

- i. observed use or evidence of use of a substance (e.g. smell of alcohol);
- ii. erratic or atypical behaviour or changes in behaviour of the employee; or
- iii. changes in the physical appearance or speech patterns of the employee;
- iv. any other observations that suggest the colleague may be under the influence of alcohol or drugs;

Employees tested in this circumstance will be removed from work until the investigation is complete. Depending on the test result, a fitness for work assessment may also be required prior to receiving clearance to return to work.

- b. Post Incident: Alcohol and drug testing may be required after a serious or potentially serious work-related incident as part of a full investigation into the circumstances. The decision to refer an employee, or a group of employees, for a test will be made by the supervisor investigating the incident after consultation and agreement of a second level of supervision or management, or other appropriate resource. A serious or potentially serious incident would be one causing:
 - i. a fatality;
 - ii. serious personal injury to a worker, a member of the public or any other individual;
 - iii. an environmental incident that causes or has potential to cause adverse effects;
 - iv. significant loss or damage to property, equipment or vehicles; or
 - v. significant loss of Company or client revenues

In addition to the incidents listed above, at their discretion, management may require a post-incident test after any other serious work incident or a near miss considered to have had significant potential for more serious consequences as part of a complete investigation.

Testing will also be required after any less significant incident if, as a result of the preliminary investigation, it is concluded that alcohol or drug use may have been a factor (e.g. reasonable cause situation).

Reporting an Incident:

- i. Employees are required to report the situation to their immediate supervisor as soon as possible after the incident;
- ii. Employees are required to participate fully in any subsequent investigation; and
- iii. Failure to report an incident is a violation of this instruction.

Testing Procedures:

- i. The decision to test should be made as soon as possible after the triggering event;
- ii. Arrangements for testing should be made as soon as possible unless this is impossible because medical attention is required;
- iii. The need for a test must be documented as part of the preliminary investigation as soon as practicable after the triggering event;
- iv. 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 or environmental factors);

- v. 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;
 - vi. Employees to be tested must not use alcohol until after the test has been completed, or they are advised a test is not required; and
 - vii. If there is any reason for delay, the supervisor will stop attempting collection at 8 hours after the incident for alcohol testing and 32 hours for drug testing.
- c. Return to Work – Post Violation: In those situations where employment is continued after an instruction violation, employees will be required to pass a return to work test and may be subject to unannounced testing with random selection of dates as a condition of continued employment and set out in an agreement with the Company.
- d. Return to Work - Post Treatment: Unannounced testing with random selection of dates may be used as a monitoring tool as determined on a case by case basis to support the recovery of any employee assuming duties after primary treatment for an alcohol or drug problem.
4. Failure to Test: Failure to report directly for a test, refusal to submit to a test or complete the testing process, refusal to agree to disclosure of a test result to the Company Program Administrator, a confirmed attempt to tamper with a test sample, or failure to report involvement in an incident which may require testing, are a violation of this instruction.
5. Possession of Alcohol or Drugs: Vale reserves the right to investigate any situation when there are reasonable grounds to believe that banned substances are present on Company premises in violation of this instruction. Supervisors are responsible for identifying situations where an investigation is justified based on a combination of indicators which could include behaviour, odour, or presence of paraphernalia.
The supervisor will be responsible for advising designated senior management of the situation, who will make the final decision as to whether and how to initiate an investigation, including whether to involve law enforcement.
6. Loss of License/Impaired Driving Charge: All employees who regularly or periodically operate any motorized vehicle on behalf of Vale must advise management of any loss of their driver's license for any reason. They will no longer be permitted to drive in that circumstance.
In addition, employees must inform their supervisor immediately if they have been charged with an impaired driving offense when operating a Company vehicle or driving on behalf Vale. Impaired driving would include but not be restricted to testing over the legal BAC (Blood Alcohol Content) in that jurisdiction, driving while impaired, or refusal to blow into a breath analyzer or provide a sample for testing. If an employee receives a charge there will be an investigation. Action taken, including any discipline, will be appropriate to the situation. Failure to report the charge will normally be grounds for discipline up to and including termination of employment.

D – Consequences of Instruction Violation

1. Any violation of the provisions of this instruction will result in discipline up to and including termination of employment. In all situations, an investigation will be conducted and documented to verify that an instruction violation has occurred. Therefore, management has the authority and discretion to hold out of service any individual who is believed to be involved in an incident that could lead to discipline pending the results of the investigation. The appropriate discipline in a particular case depends on the nature of the instruction violation and the circumstances surrounding the situation; the severity of the violation will warrant entering the discipline process at different levels.
2. A positive drug test and/or an alcohol test result of .04 BAC or higher are considered a violation of this instruction. Failure to complete the testing process is grounds for termination of employment.
3. Should the Company determine that employment will be continued in a specific circumstance, the individual would be required to enter into an agreement governing their continued employment which may require any or all of the following actions, or any other condition appropriate to the situation:
 - a. temporary removal from their position;
 - b. assessment by a Substance Abuse Professional (SAP) to determine the need for a structured treatment program;



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- c. adherence to any recommended treatment and aftercare program;
- d. maintenance of sobriety and satisfactory performance on return to duty;
- e. successful completion of a return to duty test;
- f. ongoing unannounced testing for a period determined on a case by case basis; and
- g. no further violations of the instruction.

Consequences for failure to meet the requirements of the agreement during the monitoring period will be set out in the individualized agreement

Responsibilities:

• All Employees:

All employees are expected to perform their job in a safe manner and in all ways consistent with established Company practices. In addition, all employees are required to:

- read and understand the instruction and their responsibilities under it;
- report fit for work and remain fit while on Company business, premises, and property;
- be fully in compliance with the instruction if called in when scheduled on call;
- seek advice and follow appropriate treatment if they have a current or emerging problem and follow recommended monitoring programs after attending treatment;
- co-operate with any work modification related to safety concerns;
- intervene as appropriate to encourage a co-worker to access assistance before an alcohol or drug problem impacts safe performance of their work;
- in the interest of safety, advise their supervisor if they believe another employee, contract worker or visitor are on a job site in an unfit condition; and
- co-operate with an investigation into a violation of this instruction, including any request to participate in the testing program

• All Supervisory Personnel:

All supervisory personnel, in addition to their responsibilities as employees, are responsible for:

- ongoing performance management to ensure safe operations and effectiveness of the program;
- guiding employees who voluntarily seek assistance for a personal problem to appropriate resources (e.g. the Employee Assistance Program (EAP), or other internal resources) while maintaining confidentiality;
- advising the Program Administrator if, in the course of any performance-related discussion, an employee says they have a problem with alcohol and/or drugs;
- taking appropriate steps to investigate any possible violation of the standards set out under this instruction;
- making referrals for an alcohol and drug test in a post incident or reasonable cause situation when required to do so under this instruction; and
- monitoring and ensuring instruction compliance of contract workers;

• Safety and Health Department:

Each Alcohol and Drug Program Administrator will be part of the Safety and Health Department and responsible for:

- ensuring consistent administration of the instruction;
- resolution of any questions related to the interpretation of this instruction;
- supporting supervisors in meeting their responsibilities under this instruction;
- coordinating development and delivery of employee education and supervisor training programs related to drug /alcohol use/abuse and identification;
- making arrangements for a Substance Abuse Professional assessment as required;
- ongoing management of the alcohol and drug testing program; and
- supporting employees requiring professional counseling and/or treatment as per this instruction



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Appendixes:

- Appendix 1 – Guideline on Medications
- Appendix 2 – Alcohol and Drug Testing Procedures
- Appendix 3 – Guidelines for Business and Social Hosting

APPENDIX 1 - MEDICATIONS

All 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 overall safe performance.

Therefore, employees are expected to consult with their personal physician, a pharmacist, or appropriate Company medical staff to determine if use of the medication will have any potential negative impact on job performance. If advised the medication they are using will affect their ability to operate safely, the employee is expected to advise their supervisor of any need for modified duties.

In this situation, a medical work modification may be issued, and the employee may be assigned to alternate duties if available and at the discretion of the Company. The Company reserves the right to confirm the nature and duration of any required work modification with the treating physician through the designated medical provider without any breach of medical confidentiality or privacy laws.

- a. Antihistamines - are widely prescribed for hay fever and other allergies (e.g. Allegra, Dimetane). They are also found in many cold medications. These medications may cause drowsiness.
- b. Motion Sickness Drugs - are used to prevent motion sickness and nausea (e.g. Gravol, Antivert). Side effects may include drowsiness.
- c. Barbiturates, Sedatives, Hypnotics, Tranquilizers, Antidepressants – are used to treat sleep disorders and depression (e.g., Ativan, Imovane, Paxil). Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.
- d. Narcotics - (e.g. Demerol, Codeine, Oxycodone and Percocet). Codeine is often found in combination drugs such as 222s or 292s or Tylenol 1,2,3s. Potential side effects may include mild sedation, hypnotic state, dizziness or drowsiness.
- e. Stimulants - Medication used for central nervous system stimulation and for appetite suppression can produce sensations of well-being 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. Muscle Relaxants - are used to treat musculoskeletal pain. Most common side effects are sedation and drowsiness (e.g. Flexeril, Robaxinal).
- h. Cold Tablets/Cough mixtures - in particular, nighttime remedies can cause drowsiness (e.g. Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan (DM) or codeine).

APPENDIX 2 – ALCOHOL & DRUG TESTING PROCEDURES

The alcohol and drug testing process is based on rigorous sample collection, storage and chain-of-custody procedures in conjunction with independent medical review of results as required. These procedures are designed to ensure the accuracy and integrity of the results and are highlighted below.

- Testing will be conducted in those circumstances outlined under the Company instruction to determine the presence of cannabinoids, amphetamine/ methamphetamine, cocaine metabolites, opiates, phencyclidine and alcohol. If the Company concludes there is justification to test for additional drug classes, this list will be expanded and employees will be advised of the change. Testing for additional drug classes may also be required on an individualized basis on the advice of medical or substance abuse professionals in a post treatment situation.
- Alcohol tests will be administered by a calibrated evidential breathalyzer with a printout of test results. Only in those situations when a breath analyzer is not readily available will alcohol testing be done with a saliva strip followed by urine collection for confirmation analysis in the laboratory.
- All drug tests will be administered by urinalysis and/or by collection of an oral fluid (saliva) sample for analysis in a fully qualified and accredited laboratory. In certain situations, a “point of collection” (quick test) urine drug screening test may be administered with appropriate adulterant checks; any result that is not negative will be sent to the laboratory for confirmation analysis.
- Collection of specimens for drug testing and administration of alcohol tests will be performed by 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 event, 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(s). They will be given a copy of the Drug Testing Custody and Control Form and the Alcohol Testing Form for their records.
- Urine samples for drug testing 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). If a point of collection screening device is used, any non-negative result will be forwarded to the laboratory for confirmation analysis. Oral fluid samples for drug testing will be analyzed at the laboratory using a similar process with all confirmations being performed by liquid chromatography/mass spectrometry/mass spectrometry (LC/MS/MS), or gas chromatography/mass spectrometry/mass spectrometry (GC/MS/MS).
- Laboratory confirmed positive drug test results will be reviewed by a qualified Medical Review Officer who will endeavor to 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 as a negative, a verified positive, or a tampered or substituted specimen result.
- In the case of a verified positive test result of a urine test conducted in accordance with this instruction, the person who has been tested may request the MRO to direct the second/split sample to be tested within seventy-two (72) hours of receiving their results. Where split samples are not collected, the employee may request that the original sample be reanalyzed. 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.
- If the test is reported as dilute and negative, or cancelled because the specimen is invalid, the employee will be required to provide an additional specimen for testing as soon as possible.
- Any positive test result will be considered a violation of this instruction, whether or not the drugs or alcoholic beverage were actually consumed while on Company business, premises, or property. Failure to report directly for a test, refusal to submit to a test or complete the testing process, refusal to agree to disclosure of a test result to the designated Program Administrator at the site, or an attempt to tamper with a test sample are considered a violation of the instruction.
- All test results will be reported directly to the Company Program Administrator or designate. Except for the release of information in accordance with this instruction 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.

Appendix 3 - Business and Social Hosting

Company Social Events: The following guidelines will be followed in the hosting of any company funded social event where alcohol is served. Social events involving alcohol off-property must have the prior approval of the L3 General Manager or higher. If an event is being hosted on designated company premises away from mine or mining plant sites further approval is required from the Director for Base Metal Operations North Atlantic or the Executive Director Base Metals Operations.

- Professional/trained servers will work at each event and/or will supervise the use of untrained servers.
- Each event will have a designated management employee "chief host/hostess" (with assistance from others) with responsibility for:
 - obtaining appropriate permits;
 - establishing the general tone of the event;
 - acting as the sole contact with the servers during the function regarding opening and closing times, food and beverage arrangements, etc.;
 - ensuring bars are attended at all times;
 - ensuring alcohol is not served to individuals who appear to be intoxicated;
 - taking steps to prevent abusive or unsafe behaviour;
 - taking steps to prevent an apparently intoxicated attendee from driving after the function;
 - providing alternate transportation or accommodation where necessary; and
 - contacting 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, 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 behaviour or risk to health and safety of attendees or the community will result in a review of these guidelines and active steps to ensure the problems do not occur again.

Business Hosting: Consistent with the above standards, if alcohol is made available to Vale guests in the course of conducting business, (e.g. client lunch or dinner, conference/seminar situation) employees are expected to use judgment and be responsible in hosting others.

Note: additional information is found at:

http://www.camh.net/About_Addiction_Mental_Health/Drug_and_Addiction_Information/having_party.html

<http://www.madd.ca/english/research/liability.html>