

ALCOHOL AND OTHER DRUGS POLICY

1 Purpose

WesTrac is committed to providing a safe work environment by eliminating conditions and work practices that could lead to illness or personal injury, equipment or other property damage and disruption to its operations.

The purpose of this policy is to provide Executive direction for managing the risks associated with alcohol and other drug use.

2 Scope

This Policy applies to all entities within WesTrac, and all team members must ensure compliance. The term “team members” in this policy includes direct and indirect team members (Contractors/ Sub-Contractors) and visitors.

3 Policy Statements

The objective of the policy is to provide governance to an effective Alcohol and other Drug program within WesTrac.

The aims of the policy are to:

- Set out the requirements of the Alcohol and Other Drugs framework so everybody is aware of what is expected of them and how they can expect to be treated;
- Provide a safer working environment by minimising hazards associated with the use of Alcohol and Other Drugs;
- Provide assistance through a range of measures to overcome issues arising out of alcohol and other drug use or misuse;
- Provide a working environment which is conducive to safety, productivity and the achievement of business objectives by minimising potentially harmful impacts of alcohol or other drug consumption;
- Ensure that people who are deemed unfit for work as a result of alcohol or other drug misuse are dealt with in a fair and reasonable manner; and
- Ensure that WesTrac meets its obligations to team members and the general public to carry out its operations safely in accordance with relevant legislation.

3.1 Life Saving Commitment Requirement

Life Saving Commitments provide clarity on expectations surrounding critical risks to prevent someone from being seriously injured or killed. Persons who are unfit for work due to alcohol or other drugs increase the risk of causing a serious or fatal event and is therefore one of WesTrac's Life Saving Commitments. The Fitness for Work Life Saving Commitment states;

I will never work, drive a vehicle or operate plant and equipment under the influence of alcohol or drugs.

The following mandatory requirements also apply to the Life Saving Commitment:

- Inform your Manager/Supervisor if you are taking any prescription or over the counter medication that may impact your ability to safely complete your job. For example, dexamphetamines, medicinal cannabis of any kind or codeine.

3.2 Duty of Care

WesTrac and all team members, contractors and visitors have obligations under the 'Duty of Care' requirements listed in State based Workplace Health and Safety Legislation and at Common Law.

3.3 Duty of Employer

Under both Common Law and Legislation, the Company is obliged to provide a safe workplace so that team members are not subject to unnecessary hazards.

Part of this duty includes taking reasonable steps to ensure team members are in a fit state to work safely and to minimise risks to both themselves and to others.

3.4 Duty of Team members

A team member has a corresponding duty both at Common Law and under Workplace Health and Safety Legislation to take reasonable care so as not to expose themselves or others to unnecessary risks.

3.5 Exemptions (Alcohol only)

Alcohol should not be consumed during work hours. However, there may be times when a manager considers it appropriate for team members to consume alcohol. Where this exemption occurs, the following requirements must be adhered to.

If alcohol is to be consumed off site during work hours the team member will;

- Obtain written permission from their line manager prior to the event;
- Not return to work premises for the remainder of that shift or day if consuming alcohol;
- Ensure they consume limited alcohol so as to be fit for work the following shift;
- Prepare adequate and safe transport; and
- If consuming alcohol during a team member's standard working hours, team members may not operate a WesTrac vehicle.

Events hosted by WesTrac (at any location) during work hours where alcohol is served will ensure appropriate controls are in place and all events must be approved in writing by an Executive Team Leader. This does not include Social Club events as these are not the responsibility of WesTrac Pty Ltd.

Any team members returning to work must remain compliant to the alcohol level limit of 0.00%.

3.6 Assessment by Manager/Supervisor and other Team members

The Manager has responsibility for assessing whether a team member is fit for work. A Manager who considers a team member may be unfit for work due to alcohol or other drugs may direct that team member to undertake an Alcohol and/ or Drug screen.

Any team member who has reason to believe that another team member is under the influence of drugs or alcohol are obliged to report the person to their manager who will be responsible for taking action they deem appropriate.

3.7 Alcohol and other Drug Testing Types

Team members are required to undertake drug and alcohol testing when requested. The following types of testing will be used:

- Random testing
- Breach testing
- For cause testing
- Suspect testing
- Self-testing

3.7.1 Random Testing

Random drug and alcohol testing will apply to all team members, regardless of position, and can include visitors. A random generation system will apply in selecting team members who will be tested. This will include;

- Electronic randomizing software and systems select a random sample utilising employee numbers
- Manual randomizers – e.g. Coloured ping pong balls (Where electronic system is not available)
- Schedule; Random employees on site in an area at a time by schedule as per existing process, Scheduled visitors – e.g. every 40th visitor including sub-contractors.
- Site based/ customer randomizer models

WesTrac will use the most appropriate random selection system as appropriate depending on the environment and access to the various randomization modes.

3.7.2 Breach Testing

A team member who has had a breach under this policy, and continues being employed or engaged for duty by WesTrac, shall be required to undergo further routine testing at the rate of a minimum of six (6) additional tests over a six (6) month period which does not include the standard random testing program.

3.7.3 For Cause Testing

Team members directly involved in an incident (regardless of fault) may be required to undergo drug and alcohol testing. Incidents may include (but are not limited to):

- Vehicle accidents
- Workplace injuries
- Property damage
- Near misses

3.7.4 Suspect Testing

Where a team member is suspected of drug or alcohol use through erratic behaviour, physical appearance or other indicator, then they may be subjected to drug and / or alcohol testing at the discretionary assessment of their Supervisor/ Manager.

3.7.5 Self-Testing

Team members or visitors have the opportunity to voluntarily self-test prior to the commencement of their shift and entry to the operational areas of the workplace or site where facilities exist.

- **Alcohol:** Self-testing for alcohol must be performed prior to the start of shift (for team members) and before entering the operational work area.
- **Drugs:** Self-testing for illicit substances may be done voluntarily while off-shift and off-site at the team member's own expense.

If a positive reading is registered, the team member must inform their manager, not enter any operational areas, leave site immediately and not commence work until fit for work. They must not operate any WesTrac vehicle.

If a team member is unfit to drive, then they must make personal arrangements to get themselves and their private vehicle home. A WesTrac vehicle will be left at WesTrac premises.

Once WesTrac initiates workplace testing, or a team member's rostered shift start time has been reached, then self-testing is excluded as an option.

3.8 Counselling and Rehabilitation

If a WesTrac employee believes they have an alcohol or drug related dependency problem, assistance can be sought from Supervisors/ Managers or the appropriate People and Culture team member.

Counselling and Rehabilitation, if required, can be arranged on a strictly confidential basis or an employee can contact the EAP directly themselves. Employees (and their immediate families) can access six EAP sessions. Additional sessions may be approved on the recommendation of the EAP provider.

EAP continues to be available for direct WesTrac employees who have their employment terminated through drug or alcohol misuse.

In WA this may be arranged through AccessEAP (Employee Assistance Program) or through other agencies such as those listed below:

AccessEAP	1800 818 728
Alcohol and Drug Authority (24 hours)	08 9370 0333
Alcoholic's Anonymous (24 hours)	08 9325 3566
Narcotics Anonymous	08 9227 8361

In NSW this may be arranged through AccessEAP (Employee Assistance Program) or through other agencies such as those listed below:

AccessEAP	1800 818 728
Narcotics Anonymous	02 9212 3444
Alcoholic's Anonymous	02 9387 7788

3.9 Confidentiality

All team member information generated as a result of this policy will be kept confidential by the People and Culture Department and relevant Manager.

Information will only be provided to personnel within WesTrac who have a legitimate need to know to ensure safety, health or performance. No information relating to this policy will be used to identify an individual unless to obtain professional legal advice or if required by law.

Statistics will be compiled from time to time and made available to all staff. Any published statistics will not identify any team member's name or personal information.

Breaches of confidentiality including screening results or team member medical information may result in the termination of employment.

3.10 Company Residential Property

Alcohol is allowed on WesTrac owned or leased property that constitutes a team member's private accommodation.

The possession or use of any illicit drugs on Company residential property, or Customer property, is likely to be deemed as serious misconduct and result in instant termination of employment subject to standard Coaching and Disciplinary processes including a show cause meeting.

3.11 Client Sites and Accommodation

WesTrac team members working at, or visiting, client's sites are required to abide by, and co-operate with, the requirements of our Clients' Drug and Alcohol Policy and Procedures. This policy will apply in the event a client does not have any specific alcohol and other drug policy or procedures or where their policy is less stringent than WesTrac's.

In the event of a team member testing positive on a client site, the team member should immediately contact their manager who will arrange safe transport of the team member and any vehicle to a suitable and safe location.

Under no circumstances should the team member drive a vehicle or operate machinery without explicit approval from an Area, Branch or Contract Manager.

WesTrac team members testing positive on client's sites will be classed as a positive screen under the WesTrac drug and alcohol policy. The team member may be required to undergo further drug and alcohol testing once returned to a WesTrac location or the test results of our customers may be used within this policy and the Alcohol and Other Drug Procedure.

3.12 Contractors and Visitors on WesTrac Sites

Contractors and visitors will be treated in accordance with this policy. The principal contractor will be notified of any breach. WesTrac reserves the right to remove any contractor or visitor at any time for any reason.

3.13 Alcohol and Other Drug Program

3.13.1. Alcohol and Other Drug Levels

All team members and visitors must not present for work, be working, or be on WesTrac property, with any of the following;

- **Alcohol:** A Breath Alcohol Concentration (BAC) that is greater than the equivalent of 0.00g of alcohol in 100mL of blood or 210L of breath which is expressed as 0.000%
- **Saliva Screening - Drugs and Prohibited Substances:** Drug levels higher than the concentration levels set out in Australian/New Zealand Standard AS 4760:2006 "*Procedures for specimen collection and the detection and quantitation of drugs in oral fluid*", (as amended from time to time)
- **Urine Screening - Drugs and Prohibited Substances:** Drug levels higher than the concentration levels set out in Australian/New Zealand Standard AS 4308:2008 "*Procedures for specimen collection and the detection and quantification of drugs of abuse in urine*" (as amended from time to time); or
- Testing levels of other drugs that may not be set out in an Australian Standard, but which WesTrac:
 - Considers may compromise workplace safety; and
 - Has notified its team members, contractors and visitors are prohibited as set out in the Prohibited Substances list as updated from time-to-time and available on the DMS.

Any breach of these standards will result in a team member being deemed "Unfit for Work". Direct employees will be suspended without pay until they are fit to return to their normal duties. During this time, they may access Annual Leave and Long Service Leave entitlements but not Personal (Sick/ Carers) Leave entitlements. Employees will not be eligible to go into negative annual leave balances during this time.

WesTrac reserves the right to cancel or restrict access to Company property including Company vehicles and any system access including mobile phones, laptops or tablets. During any period where a team member is stood down, they will not attend other WesTrac related activities such as training courses.

A breach of these standards by a Contractor or Visitor will result in removal from all WesTrac sites and from ongoing work with WesTrac.

3.14 Prescribed Medication

Prior to engaging in the use of a medication, that without a doctor's prescription would be considered illicit, team members must first inform their leader. An assessment will be made in respect of the team member's fitness for work and ability to perform the inherent requirements of their role, on a temporary or ongoing basis.

Prescribed medications include, but are not limited to, schedule-8 (controlled) drugs, such as opioids, psilocybin, MDMA, THC, dexamphetamine, among others. Furthermore, all Medications must be declared with your relevant Leader and an Employee Medication Declaration (FTT-NAT-HR-0129) completed on every applicable occasion.

For a prescription to be valid, it must not be more than 12 months old.

3.15 Medicinal Cannabis

The use of medicinal cannabis products may decrease one's ability to safely and/or adequately perform some tasks due to its impairing effects on mental alertness and physical coordination. There is currently no effective way to measure impairment levels.

Team members are required to remain below the AS/NZ4308 standard of urine testing by mass spectrometry. This is in alignment with 3.13.1 Alcohol and Other Drug Levels of this policy and in alignment with 3.4 (d) of WesTrac's Drug and Alcohol Procedure.

Prior to commencing a course of any prescribed medicinal cannabis, team members must first discuss this with their leader to assess any potential impact on the safe performance of their role. The leader will consult with a P&C representative as to the management of the matter. Where a team member fails to declare their use of prescribed medicinal cannabis then this will be considered a breach of this policy and may lead to disciplinary action, up to and including termination of employment.

For the avoidance of doubt, regardless of prescription, any team member who returns a confirmed positive reading in excess of the AS/NZ4308 standards, will be considered to have breached this policy and may lead to disciplinary action, up to and including termination of employment.

All DAS testing, for cause or random, is reported through People & Culture for management in accordance with AS/NZ4308 standards.

3.16 Alcohol Breaches

If an initial BAC test is positive, (i.e., BAC above 0.00%), an employee will wait 20 minutes for a final confirmation test result. If the confirmation alcohol test is positive (i.e., BAC above 0.00%), the team member's Supervisor must refer to the Alcohol and Other Drugs Procedure.

A breach of the BAC limit during the first six months of employment is likely to lead to termination of the employment contract.

3.17 Drugs and Prohibited Substance Breaches

A breach for Drugs or Prohibited substances as set out by the levels in clause 3.13.1 above, or on the Prohibited Substance list, is likely to lead to termination of employment subject to a standard disciplinary process.

3.18 Refusal to Cooperate with, or take, a test

Refusal by a team member to submit to, or cooperate fully, with the administration of a drug or alcohol screen, including the signing and initialling of screening documents, will be treated as a positive result and the team member will be subject to the Alcohol and Other Drug Procedure. Failure to produce a testable sample, eg urine, in accordance with the Australian Standards within four hours of initiating screening will be deemed to be a refusal

Subject to formal disciplinary procedures, a team member may be dismissed without notice for failing to comply with a reasonable and lawful direction if they refuse to cooperate with, or attempt to circumvent, the testing process.

3.19 Misconduct

Subject to formal disciplinary procedures, the following behaviours could be considered serious misconduct and a team member could be subject to disciplinary summary dismissal for any of the following;

- The possession, consumption, sale or supply of illegal drugs, including synthetic drugs
- The unauthorised sale or supply of alcohol
- The possession or consumption of prescription drugs without a valid prescription, or a prescription that is more than 12 months old
- The unauthorised sale, use or supply of prescription drugs such as hypnotics, sedatives, anti-depressants etc.
- Misuse of non-prescription ("over the counter") medication
- The use of any drug including synthetic drugs where a team member compromises the health and safety of another person's work performance or ability to work safely may be jeopardised
- Breaches of confidentiality including the disclosure of results or medical history
- Tampering with an alcohol or drug test sample or attempting to falsify records, readings or samples in any way
- If a team member's alcohol reading is above 0.05% BAC (0.05mg/100mL and above)

This is not an exhaustive list.

3.20 Disciplinary Record and Reemployment

Positive tests results will have a two-year life span.

Team members terminated under this Policy will not be able to return to WesTrac for a period of two years as a direct employee or contractor/sub-contractor. If a candidate being considered for employment at WesTrac breaches this policy, they will be refused employment for a two-year period from the date of the failed Alcohol or Drug screen undertaken as part of the recruitment process.

Any subsequent breach of this policy by a Team member returning to work at WesTrac will result in instant dismissal and lifetime ban from working with WesTrac in the future.

Dates of return will be recorded in appropriate electronic People and Culture and Finance/ Procurement systems.

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Next Review Date

12th August 2026

Document Owner

GM - People & Culture

4 Responsibilities

The below outlines key accountabilities to ensure compliance with this policy:

GM – People and Culture

- Is accountable for ensuring the successful implementation and operation of the Alcohol & Other Drugs Policy. This will ensure that all team members at WesTrac understand and support the Alcohol & Other Drugs Policy and adequate resources are provided for the education, training, counselling and other requirements of the policy.

General Managers and Managers

- Are accountable for the effective implementation and operation of this Alcohol & Other Drugs Program in their areas of responsibility. This includes the provision of training, education and other support programs and periodic review of the implementation, application and effectiveness of the policy.
- Managers, in conjunction with the People and Culture team, have responsibility for determining whether an individual is fit for work.

Supervisors/ Line Managers

- Are accountable for ensuring that all team members are aware of, and comply with, the provisions of this policy.
- Must assess the fitness for work of team members under their supervision, taking prompt and appropriate action where required or to respond to any reports of a breach of this policy.
- All Leaders will be appropriately educated to ensure their competency in handling these matters.

Team members are accountable for:

- Ensuring that they are not impaired by drugs or alcohol contrary to this procedure;
- Raising any concerns about their own fitness for work about alcohol, illicit drugs or prescribed/ over the counter medication;
- Raising any concerns about another person's fitness for work with their manager;
- Notifying their relevant Supervisor or Manager of breaches to the policy. This includes:
 - The unauthorised possession or consumption of alcohol or other drugs on site, in accommodation or during work.
 - Team members are required to inform their manager of any prescription medication they have consumed either prior to coming to work or during working hours. A team member is required to provide WesTrac with a doctor's certificate which explains what affect, if any, this medication will have on their capacity to safely perform their duties.

5 Reporting

Results of alcohol and other drug screening will be stored centrally in electronic format. Monthly reporting will be provided as confidential reports to the Executive team and Management from the People and Culture team.

The purpose of these reports is to monitor the effectiveness of this policy, identify trends and provide levels of support where appropriate to enhance safety and wellbeing in the workplace.

6 Further Information

All employees and contractors who require further information or need clarification of anything contained in this Policy should contact their manager or People and Culture representative.

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7 Accountabilities

Compliance to Policy

All Employees, Visitors and Contractors

Implementation & Review

People & Culture Teams – NSW & WA

Approval of Policy

GM – People and Culture

Monitoring

People & Culture Team

Interpretation and Advice

People & Culture Team Members

8 Related Documents

This Policy should be read in conjunction with the following internal documents (i.e. internal documents such as policies, procedures, forms).

Document Number	Title
PCD-NAT-HR-0006	Alcohol and Other Drug Procedure
PCD-NAT-HR-0039	Coaching and Disciplinary Procedure

This policy should be read in conjunction with the following legislative or compliance guidelines (if required):

Title	Description
AS 4760:2006 - Procedures for specimen collection and the detection and quantitation of drugs in oral fluid	Australian Standard for saliva testing
AS 4308:2008 - Procedures for specimen collection and the detection and quantification of drugs of abuse in urine	Australian Standard for urine testing

The following outlines the reporting requirements related to this policy:

Reporting Requirement	Reporting Body	Frequency
Statistical information; Number and type of screens, Number and type of positive screens, Location	Executive Leadership Team	Monthly

9 Definitions and Abbreviations

The following definitions and abbreviations are used throughout this Policy:

Term	Definition

10 Document Amendment History

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GM - People & Culture

Revision	Date	Description	Prepared By	Reviewed By	Approved By
1.0	30/05/13	DMS – new template transfer only	RV	MC	RG
2.0	07/03/14	Included Life Saving Rules, change in alcohol limit of 0.05 to 0.00	MC	BS	JH
3.0	28/04/14	Addition of numbering for each policy heading	MC	BS	JH
4.0	08/03/16	Point 3.5 update with alcohol limited added it.	GH	JH	PM
5.0	19/05/16	Point 3.5, Drug level limits removed	VS	BS	PM/JH
6.0	16/12/19	Updated	RB	RB	RH/TE
7.0	12/05/23	Updated and include medicinal cannabis	REH	RPotter	RPotter/ BJ
8.0	12/08/2024	Update to medicinal cannabis requirements	R.Elkaim Hanisch	N.Kelly	K.Newton KB