

# REPSOL FACILITY ALCOHOL & DRUG SEARCH PLAN

## 1. SCOPE AND PURPOSE

In accordance with Repsol's Alcohol and Drug Policy, the use, possession, distribution, offering or sale of Alcohol, Drugs, Drug Paraphernalia or Contraband (as defined herein) is strictly prohibited while on Company business, Company Premises. In addition, employees and contract employees are expected to responsibly use prescribed and over-the-counter medications (including herbal preparations). The intentional misuse of medication and the unauthorized possession of prescribed medication without a legally obtained prescription and the unauthorized distribution, offering or sale of prescription medications are prohibited when on Company business or at Repsol Facilities. Repsol employees and Contractors are expected to report fit for duty for all scheduled and unscheduled work and remain fit for work while on Company business and Company Premises.

The primary objective of this document is to set forth the methods to be used in order to detect, intercept, and mitigate the possession, use and distribution of prohibited Alcohol, Drugs, Drug Paraphernalia or other Contraband at a Repsol Facility.

## 2. DEFINITIONS

**"Accommodation(s)"** means a room located at the Camp or a Worksite which is leased or provided by the Company for Personnel.

**"Alcohol"** refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.

**"Camp"** means the Camp facilities and Accommodations leased or owned by Repsol for Company and Contractor employees in connection with the provision of services to Repsol.

**"Camp Rules"** means the rules posted at the Camp facilities and Accommodations leased or owned by Repsol for Company or Contractor employees.

**"Company"** means Repsol Oil & Gas Canada Inc. and its subsidiaries in Canada.

**"Contraband"** means goods that are obtained through an unlawful act or that are unlawful to possess under the law, and may include any property of Repsol or its Contractors obtained unlawfully, and including any Illicit Drug or substance and any prohibited or restricted weapon, or explosive device.

**"Contractor"** means a company or individual consultant hired or contracted by Repsol to conduct work on its premises and includes its affiliates, subcontractors, and each of the foregoing parties' Personnel, who are in any way involved with the work or any other matters arising from the work, and shall also include successors and affiliates of the Contractor, in addition to any invitees of Contractor.

**"Dog Handler"** means a person, in control of a dog that has been specifically trained in the detection of illicit substances such as illegal drugs and explosive substances.

**“Drug(s)”** means any substance, including but not limited to alcohol, illegal drugs, medications, or herbal preparations the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For purposes of this Plan, drugs of concern are those that inhibit an individual's ability to perform his or her job safely and productively including:

- *Illegal 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); and
- *Medication* means medication which has been obtained legally (either over-the-counter or through a doctor's prescription), which has not been obtained legally, has not been disclosed and cleared with the Camp medic or which is being misused (i.e., such as Percocet, Vicodin and Oxycontin).

**“Drug Paraphernalia”** means any equipment, product or material primarily intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing, using or introducing into the human body a Drug. This includes any product or device that may be used to tamper with or adulterate a test sample.

**“Occupant”** means an individual registered to occupy Accommodations at a Repsol Facility.

**“Occupant’s Employer”** mean contract service providers overseeing work on Repsol’s behalf or the employer of individuals residing in Repsol Accommodations.

**“Service Provider Camp Management”** means employees or contract service providers overseeing the care, maintenance, meal preparation, cleaning services and overall upkeep of the Camp and activities.

**“Personnel”** includes directors, officers, employees, Contractors, Contractor employees, subcontractors, subcontractor employees, consultants and agents of Repsol.

**“Plan”** means the Repsol Facility Alcohol & Drug Search Plan.

**“Police”** means the Royal Canadian Mounted Police (RCMP) or any other law enforcement authority having jurisdiction in the area where the Camp is located.

**“Reasonable Cause”** means any observation or reliable information that leads to a reasonable belief that a person is in possession of, or is concealing upon themselves, in a vehicle or in a room any Contraband.

**“Search”** means physically inspecting the Repsol Facility and personal property (including company or personal vehicles) as further described in this Plan for the purpose of determining compliance with the Camp Rules, the Repsol Alcohol & Drug Policy and this Plan and may include the use of a Sniffer Dog and Dog Handler.

**“Search Team”** means a team assembled by Repsol Security to conduct Searches that may consist of the following personnel: Repsol Corporate Security, contracted security officers, Sniffer Dogs, Dog Handler, Camp Management, Site Management, Safety and others as defined in this Plan.

**“Security Incident Reports”** means all reports created by Repsol Security to document actions taken, Searches, or observations made in relation to this Plan and which will be electronically maintained within Repsol approved databases.

**“Sniffer Dogs”** means narcotic detection dogs that have been specially trained, for the detection of illegal drugs, substances, explosives and explosive devices otherwise referred to as Contraband.

**“Repsol”** means Repsol Oil & Gas Canada Inc. and its Canadian subsidiaries.

**“Repsol Facility”** means a Camp or Worksite which is part of the Company’s business and connected to the provision of services to the Company.

**“Repsol Security”** means and includes any contracted security person, or duly authorized agent of the Repsol Corporate Security Department.

**“Unannounced”** means an unpredictable pattern of identifying vehicles or areas for Searches based on safety concerns.

**“Worker”** means an individual employee, contractor or service provider working at a Repsol Facility and includes Occupants at Camps provided by Repsol for the provision of services to Company.

**“Worksite”** means rig or plant, well pad, lease, plant site, battery, rig shacks, office trailers and sleeping quarters or any other location where work for the company is performed, or where Repsol is the owner, operator or licensee.

### **3. APPLICATION AND AUTHORITY**

#### **3.1 Application**

This Plan applies to all individuals working, staying at or visiting Repsol Facility including: Repsol employees, Contractor and subcontractor Personnel and their invitees, consultants and agents of Repsol and visitors.

#### **3.2 Authority**

Repsol employs a significant number of Contractors in the conduct of its business. As terms of their contract with Repsol, Contractors are required to comply with Repsol’s Alcohol & Drug Policy and Repsol’s Alcohol & Drug Policy Expectations for Contractors. Responsibility for ensuring compliance with and enforcement of these Policies lies primarily with operational management. In support of operational management, Repsol Security will assist in enforcing the Alcohol and Drug Policy and ensure the safety of Workers and visitors at a Repsol Facility, in part by conducting periodic Searches for Alcohol, Drugs, Drug Paraphernalia and Contraband at the Repsol Facility pursuant to this Search Plan.

Repsol leases the Accommodations and related facilities and provides them to Contractors, visitors and Personnel as part of operations or during the work that they are conducting for Repsol. Therefore, as a matter of law, the Accommodations are within the possession and control of Repsol who is therefore entitled to reasonably control the safety of activities and the completion of work. Under both the federal Criminal Code and Provincial Occupational Health and Safety Legislation, Repsol has an obligation to provide a safe and harassment free workplace.

Safety is also one of Repsol's core values corporately. With the inherent risks in drilling, construction, and production at oil and gas facilities, all Personnel staying at a Camp or working at a Repsol Facility are considered to occupy safety sensitive positions and may be required to work during their time off in the event of an unforeseeable emergency. For these reasons and in compliance with its Alcohol and Drug Policy, Repsol has adopted a "zero tolerance policy" with respect to the possession, use or distribution of Alcohol, Drugs, and Drug Paraphernalia at Repsol Facilities. This Plan is a pre-determined Plan of action to help ensure the protection of Personnel working or staying at Repsol Facilities.

Inherent in Repsol's right to develop and adopt an Alcohol and Drug Policy is the right to take steps to enforce it. Also inherent in Repsol's rights as the provider of the Camp and the operator of the Repsol Facility is the right to set the rules under which Personnel will be allowed to access the Repsol Facility. All positions at Repsol Facilities, including Camps are considered to be "safety sensitive positions". Drugs, Alcohol and Contraband are not permitted in Repsol Facility's. In this regard, Repsol may Search for Alcohol and Drugs at any Repsol Facility, including the Accommodations of Occupants without prior notice, and may employ the use of trained Sniffer Dogs and Dog Handlers for such Searches. Repsol may also Search vehicles entering or located at a Repsol Facility for Alcohol, Drugs, Drug Paraphernalia or Contraband. All Searches will be conducted in a professional and respectful manner.

Repsol will confiscate any Alcohol, Drugs or Contraband found at the Repsol Facility and will turn over any confiscated Drugs or Drug Paraphernalia to the Police. Confiscated Alcohol will be secured by Repsol Security and either disposed of or returned to the owners as he or she leaves the Camp and Worksite, as applicable.

### **3.3 Roles and Responsibilities**

#### **Security**

- Direct the day-to-day operations with respect to this Plan.
- Ensure that Security Incident Reports are accurate, timely, and entered into the appropriate Repsol database.
- Maintain records of all Alcohol or drug related incidents.
- Monitor the Plan for compliance and success and report on the effectiveness of the Plan to Repsol.

- Notify Repsol’s Occupational Health Department immediately of a disputed Search, refusal to comply with this Plan or a Search request or a significant security incident and will participate into a review of any such incident.
- Prepare a monthly summary report of all Security Incidents at the Camp for Repsol Management and the Repsol Occupational Health Department.

### **Occupational Health**

- Review the monthly summary of Security Incident Reports.
- Upon notification of a disputed Search, refusal to comply with this Plan or a Search request, or in the case of a significant security incident, will form a review team consisting of Occupational Health, Legal, Corporate Security, Human Resources, and other departments if deemed appropriate, to review the issues.

### **Operations**

- Provide timely information to Corporate Security regarding the nature of activity, name (Rig Name & #), location, timeline of activity, contact person, contact information and any other information reasonably requested to coordinate and conduct Searches.

## **4. SEARCHES**

### **4.1 Employee and Contractor Notification & Consent to Search**

- a. **Employee:** The notification of Repsol employees regarding this Plan will be through their immediate supervisors and the acknowledgement of understanding of the new procedures will be by employee signature on the Camp Acknowledgement and Consent Form.
- b. **Contractor:** Repsol Contractors will be advised by letter, by the applicable Repsol operations groups relevant to specific Contractors (e.g. Drilling and Completions) staying at a Camp or working at a Repsol Facility by letter. Confirmation that Contractors have advised their employees staying at a Camp or working at a Repsol Facility will be in the form of a written acknowledgement by the Contractor. All Repsol departments will be responsible for ensuring the notification and sign-off of their Contractors. Contractor supervisor must provide any subcontractor staying at or visiting the Camp with a copy of the Camp Rules and ensure that an “*Acknowledgement and Consent*” Form is signed (see paragraph c, below). The senior Repsol representative at a Repsol Facility must ensure that any Worker present has signed the “*Acknowledgement and Consent*” Form prior to the Worker accessing the site or performing any work or services.
- c. **Consent Form:** Workers must review and sign the “*Acknowledgement and Consent*” Form as a condition to being allowed to enter or reside in a Repsol Facility. Among

other things, the *“Acknowledgement and Consent”* Form specifies that they agree to periodic and Unannounced Searches of the Repsol Facility (including their room) by a Search Team, which may include Sniffer Dogs and Dog Handlers. A copy of the Acknowledgement and Consent Form is attached to this Plan as **Schedule “A”**.

d. **Orientation:**

- **Camps and Sleeping Accommodations:** The Camp Rules and this Plan will be reviewed verbally with Workers every time they arrive at the Camp prior to being given a room key. Workers staying at a Camp or at a Repsol Facility must sign the *“Acknowledgement and Consent”* Form attached as **Schedule “A”** prior to being given Accommodations at the Repsol Facility. Workers will only be asked to sign one *“Acknowledgement and Consent”* Form annually which will be confirmed each time they arrive at a Camp. The Worker’s supervisor is responsible for confirming that the individual understands the Camp Rules.
  
- **Repsol Facility:** The Repsol Worksite Rules and Contractor Expectations regarding Alcohol and Drug use will be reviewed verbally with Workers and visitors every time they arrive at the Repsol Facility. Workers and visitors must sign the *“Acknowledgement and Consent”* Form attached as **Schedule “A”** prior to being granted access to the Repsol Facility. Workers and visitors will also be asked to sign the *“Acknowledgement and Consent”* Form each time they arrive at the Repsol Facility. The Worker’s supervisor is responsible for ensuring that the individual understands the *“Acknowledgement and Consent”* Form. A Facility Search *“Acknowledgement and Consent”* Form is valid from the worker’s entry on the date of their signature until they leave the Worksite and will be kept on file by Repsol as evidence of the worker’s consent.

e. **Other Forms of Notification:**

- **Signage:** In addition to obtaining express consent prior to room assignment or entrance onto a Repsol Facility, Workers will be informed that the use and possession of Alcohol, Drugs and Contraband are prohibited and that Repsol Facilities are subject to Unannounced Search (including the possible use of Sniffer Dogs) through signage posted in visible areas in and around the Repsol Facility.
  
- **Pillow Top Reminders:** Pillow top reminders in each room will also notify Occupants that there is no expectation of privacy in their room that Searches may be conducted of the room and that Sniffer Dogs and Dog Handlers may be used to conduct the Searches.

#### 4.2 Search Frequency and Specificity

Repsol Security will determine times and locations to perform Searches of the Repsol Facility. The times and locations of Searches will not be revealed to anyone outside of the Search Team prior to the Searches being conducted.

### **4.3 Search Team**

A Search Team will be assembled by Repsol Security at the Camp and may consist of the following members:

- Repsol Security and/or Contract Repsol Security.
- Sniffer Dog and Dog Handler.
- Safety.
- Occupational Health.

## **5. METHOD**

### **5.1 Search of Worksite**

- a. Upon arrival at the predetermined meeting location, all Search Team members will demonstrate to one another that they are not in possession of any Contraband, Drugs, Alcohol, weapons or explosives prior to initiating the Search. This will be acknowledged by all Search Team members by signing and dating an attendance sheet.
- b. The Worksite will be searched keeping in mind the configuration of the structure while considering the health and safety of the Search Team. A hand search of the rig including the control room and dog house will be considered by the Search Team as determined by analysis of information during the Search.
- c. Searches of rooms or sleeping accommodations located at the Worksite will follow the procedures noted in section 5.2 below.
- d. With the exception of Workers that are required to remain at their station for safety issues, all Workers will be gathered in a designated area of the Repsol Facility and advised that a Search will be taking place.
- e. During the Search of the common areas of the Repsol Facility, no persons will be allowed to enter the area they will be asked to wait in a designated area until the Search is complete. A member of the Search Team will stay with the Workers in the designated area so as to ensure compliance. Workers refusing to comply with this directive will be identified and may have their access privileges to the Repsol Facility revoked.
- f. All Searches will be executed with the utmost respect, care, professionalism, and maturity. With the exception of Contraband being reported within a Search report, the Search Team will hold in strictest confidence the contents of all vehicles or personal belongings and any information pertaining to the Worker.
- g. The Search Team may elect to perform Unannounced Searches of common areas within the Repsol Facility. These common areas may include, but are not limited to:

- Wellsite Trailer
- Rig
- Control Room
- Geophysical Trailer
- Lunch Rooms
- Phone Room
- Storage Rooms
- Laundry Service Rooms
- Boiler/Utility rooms
- Water Well Shed
- Generator Set
- All Other Structures
- Parking Lots
- Washrooms
- Food preparation and Dining areas. However, Searches with the Sniffer Dogs will not be performed if food is being prepared or exposed at the time

During a Search of common areas, Sniffer Dogs may be used. Search procedures noted in section 5.3 will be followed.

## **5.2 Search of Rooms**

- a. Upon arrival at the pre-determined meeting location, all Search Team members will demonstrate to one another that they are not in possession of any Drugs, Alcohol, weapons, explosives or Contraband prior to initiating the Search. This will be acknowledged by all Search Team members by signing and dating an attendance sheet.
- b. Occupants are not required to be present for any such Search and such Searches may include lockers, luggage and personal effects. While staying at the Camp there is no expectation of privacy.
- c. All room Searches will be executed with the utmost respect, care, professionalism, and maturity. The Search Team will hold in strictest confidence the contents of all Searched rooms and any information pertaining to the Occupant, with exception of Contraband being documented in a Security Incident Report.
- d. Each Search Team will perform the Search of the Accommodations, one wing-floor or bunkhouse at a time. The Search Team will proceed to the wing-floor or bunkhouse as designated by the Repsol Security.



- e. During the Search of the wing-floor or bunkhouse, no one will be allowed to enter the area; they will be asked to wait outside until the Search is complete. Anyone refusing to comply will be identified, their supervisor will be contacted, their Camp privileges will be revoked and they will be asked to leave the Camp as soon as possible.
- f. The Search Team will knock on the room doors one at a time, and announce that they are Repsol Security. If there is no one present, the door will be unlocked and propped open. If the room is occupied, the door will be closed.
- g. Once the doors are opened, the Dog Handler and Sniffer Dog will Search the open rooms with another Search Team member at the door observing the Search. The Sniffer Dog and the Dog Handler will enter each open room. If the Sniffer Dog indicates the presence of Drugs or Contraband, the Search Team will then be called in to Search the room by hand. The Dog Handler will not conduct any Search of the room by hand. No hand-Search of the room will be performed if the Sniffer Dog does not indicate the presence of Drugs or Contraband. The only exception to this would be in cases where there was no indication by the Sniffer Dog, but there was still an obvious presence of Alcohol, Drugs, Drug Paraphernalia, or some other form of Contraband that is plainly visible.
- h. If a hand-Search of the room is conducted, none of the contents of the room will be off-limits to Repsol Security. This means that all property inside the room may be inspected, including all locked or secured containers and lockers. Repsol Security may elect to cut locks in order to obtain access. If a lock is cut, a suitable replacement will be installed by Repsol Security once the Search is concluded. A note will be left in the Occupant's room informing him or her to go to the security office to obtain the new key or combination.
- i. If Repsol Security cannot obtain entry to a container inside a room for inspection, the room may be sealed-off from all future access, until such time as the Occupant can be asked to open the container in the presence of Repsol Security.
- j. Occupants have a right to refuse a Search. However, those Occupants who refuse will have their Camp privileges removed, their supervisor will be contacted and they will be asked to leave the Camp as soon as possible.
- k. At the conclusion of the Search, Repsol Security will attempt to return the room to its former state to the best of its ability. Care will be taken not to damage the Occupant's property.
- l. Repsol Security will take photographs of each room both before and after the Search.
- m. If Alcohol, Drugs, Drug Paraphernalia, or some other form of Contraband is discovered during a Search, the items will be seized by Repsol Security. If a violation of this Plan or of the Alcohol and Drug Policy is confirmed, the Occupant will be identified, their supervisor will be contacted, they will be asked to leave the Repsol Facility as soon as

possible and the incident will be documented. Photographs of the room, the room's contents, and any prohibited items seized by Repsol Security will be taken using proper evidence handling procedures. If the Occupant's supervisor is not present at the time of the Search, the room will be sealed by Repsol Security until such time as the room is packed up by the Occupant's supervisor (or delegate). The Occupant's supervisor is responsible to ensure that the Occupant's contents are packed up and the Occupant leaves the Camp as soon as possible. Repsol Security will collect all Repsol issued identification cards and/or room keys at the time of the Occupant's departure from the Camp.

- n. If nothing of interest is found within the room, the room will be re-secured once the Search has been completed, and Occupants will be allowed to enter the wing-floor or bunkhouse again only after the whole wing or bunkhouse has been secured.
- o. Written notification will be left in an Occupant's room that a Search has been conducted.
- p. Incidents involving employees or Contractors will be reported as soon as possible to the applicable Repsol operations group for their action and follow-up.

### **5.3 Search of Common Areas**

- a. A Search Team may perform periodic and Unannounced Searches of common areas within a Repsol Facility including:
  - Sitting areas
  - Television viewing rooms
  - Lounges
  - Food preparation and Dining areas. However, Searches with the Sniffer Dogs will not be performed if food is being prepared or exposed at the time.
  - Sports, fitness, and recreation areas
  - Phone rooms
  - Storage rooms
  - Laundry service rooms
  - Boiler /utility rooms
  - Parking lots
  - Washrooms
- b. These Searches may take the form of patrols with the Sniffer Dog and Dog Handler, and/or simple inspection by Repsol Security.
- c. During a Search of the common areas, Sniffer Dogs may indicate the presence of Drugs, weapons, explosives or Contraband on Workers or visitors themselves. If this is the case, the Worker or visitor will be requested to accompany Repsol Security to a private area,

where he or she will be asked to produce for inspection the contents of his or her clothing pockets or any baggage that he or she is carrying. The Search Team may also proceed to Search the Worker's room, vehicle or the visitor's vehicle for a subsequent Search.

- d. If a Worker or visitor refuses to submit to these Searches, their supervisor will be requested to attend. If the Worker or visitor continues to refuse to comply, then they will be deemed to be non-compliant with this Plan, the Camp Rules, or the Repsol Facility Rules and their Camp privileges or Repsol access privileges will be revoked and they will be asked to leave the Camp or the Repsol Facility as soon as possible.

#### **5.4 Search of Vehicles in the Parking Lot of a Repsol Facility**

- a. As requested by Repsol Security, the Sniffer Dog and Dog Handler will accompany the Search Team for Searches of any vehicles within the Repsol Facility parking lots. The Sniffer Dog will be allowed to sniff the outside of vehicles in the Repsol Facility parking lot. If the Sniffer Dog indicates the presence of any prohibited items, a Search Team member will remain with the vehicle and the registered owner of the vehicle will be contacted. Upon arrival, the registered owner or assigned driver of the vehicle will be asked to unlock the vehicle and allow the Search Team members to perform a hand Search of the vehicle. The Search Team may also proceed to locate any of the Worker's personal belongings present at the Worksite for a subsequent Search and use of the Sniffer Dog. The Search Team may then also proceed to Search the Worker's accommodations at any Camp or Sleeping Trailer. Any Alcohol, Drugs, Drug Paraphernalia, or Contraband will be seized and reported as per Section 5.5.
- b. If the vehicle's owner does not show up, their room will be locked out until the Worker attends to the vehicle in the parking lot and deals with this outstanding issue. Workers that fail to permit the Search Team members to Search the vehicle may be deemed to be non-compliant with this Plan, their supervisor may be contacted and they will be asked to leave the Repsol Facility as soon as possible. If a visitor does not permit Repsol Security or the Search Team to Search their vehicle, they will be deemed to be non-compliant with this Plan, the Camp Rules, and the Repsol Facility Rules and their Camp or Repsol Facility access privileges will be revoked, their supervisor will be contacted (where applicable) and they will be asked to leave the Repsol Facility as soon as possible.

#### **5.5 Searches at the Repsol Facility Entrance**

- a. The Repsol Facility may be equipped with a Security trailer at the entrance to the facility. The purpose of this Security Office is to control Personnel and vehicle access to the Repsol Facility.
- b. Repsol Security may be stationed at the entrance. If so, Repsol Security may request of any persons entering or leaving the Repsol Facility, to submit to a Search of their vehicle and belongings. This Search may take the form of a simple hand-Search by Repsol Security or may be assisted by a Sniffer Dog and Dog Handler when available. Persons that fail to permit Repsol Security to Search the vehicle or their belongings may be

deemed to be non-compliant with this Plan and the Repsol Facility Rules, their supervisor may be contacted and they will be asked to leave the Repsol Facility as soon as possible.

- c. Workers or visitors attempting to enter the Repsol Facility with Alcohol, Drugs, or other forms of Contraband will be denied entry to the Repsol Facility and the Police may be contacted. This is in addition to the standard Repsol Security procedures regarding the seizure, documentation, and reporting of the incident.
- d. All vehicular and pedestrian traffic may be subject to this type of Search at the entrance to the Repsol Facility. This includes Workers, Occupants, Camp Management and staff, commercial vehicles, buses, and visitors.

## **5.6 Handling of Seized Items**

- a. All Alcohol, Drugs, Drug Paraphernalia, and Contraband encountered by Repsol Security or a Search Team at the Repsol Facility will be seized immediately upon discovery. All seized items will be secured as soon as reasonably practicable in a suitable secure location after being properly documented. Drugs and Drug Paraphernalia will be reported to the Police. All seizures will be held in evidence lockers until handed over to the Police. Depending upon the circumstances of the seizure, Alcohol may be disposed of or returned to the individual when they leave the Repsol Facility, as appropriate.
- b. The Police will be responsible for any items turned over to them. All evidence turned-over to the Police will be documented by Repsol Security as to date and time of turn-over, as well as the name of the Police officer taking possession of the items.
- c. As part of the incident investigation, Repsol Security may test seized substances with Drug test kits in order to determine the identity of the substance, if needed.

## **6. RIGHT OF REFUSAL**

Repsol reserves the right to refuse site entry to anyone that is believed to pose a danger to themselves or others based on their apparent impairment either by Drugs or by Alcohol or for any other reasonable cause. Repsol is not compelled to prove any level of impairment prior to refusal.

## **7. INCIDENT REPORTING**

- a. Repsol Security will document all incidents with respect to this Plan at the Camp in a Security Incident Report that will be electronically maintained within Repsol approved databases. Security Incident Reports will include the following information:
  - All organized Search Team efforts that have been executed, indicating areas that were Searched that day, and at which times.

- All incidents of a Sniffer Dog indicating the presence of Drugs or Contraband within a room, regardless of the outcome of the subsequent hand-Search.
  - All incidents of a Sniffer Dog indicating the presence of Drugs or Contraband within a vehicle at the Camp parking lot, regardless of the outcome of the subsequent hand-Search.
  - All incidents of Alcohol, Drugs, Drug Paraphernalia, or other Contraband being encountered by Repsol Security or anyone else on a Search Team during either routine or special duties.
  - Persons who fail to cooperate or comply with the requests of Repsol Security or a Search Team. For example, by not staying outside of the bunkhouse or wing floor once asked to do so.
  - Suspicious behavior or activities.
  - Voluntary turn-ins of Alcohol, Drugs, Drug Paraphernalia, or Contraband.
- b. A Security Incident Report need not be completed for a Search at the Camp entrance where nothing of importance was discovered or encountered, due to the frequency and nature of these types of Searches.
- c. All Security Incident Reports will be completed in a timely manner and filed in Synergi. Once completed, these reports may be shared with the following bodies for information or further action:
- Repsol project or contract coordinators;
  - Repsol Human Resource department (if applicable);
  - Relevant Contractor management, if the subject of the report is a Contractor;
  - Members of the Camp Management;
  - Police; and
  - Any other parties or persons relevant to the action, management, or investigation of the incident, as deemed by Repsol Security.

## **8. EXCEPTIONS TO THIS PLAN**

- a. Personnel with an “authorization to possess” license, as mandated by Health Canada’s Marihuana Medical Access Regulations are asked to self-identify to their direct employer prior to obtaining Camp Accommodation privileges. Their employer shall

carry forward the matter to the Repsol Occupational Health Department in order to initiate a review of the case. An exception will only be granted once the case passes review, and it is determined that he or she can perform the job safely while still using marihuana for medicinal purposes.

- b. Personnel with a prescription medication, including insulin which has been disclosed to and registered with the medic located at the Repsol Facility during their site orientation. Occupants are expected to register all medications with the Repsol Facility medic upon arrival.

## 9. COMPLIANCE

- a. **Repsol Employees:** Any employee who fails to cooperate with the foregoing will be subject to appropriate action up to and including termination of employment for cause.
- b. **Contractors:** Any refusal to comply with this Plan by a Contractor or any of its Personnel will constitute a breach of the agreement between the Contractor and Repsol. Repsol may terminate the agreement “for cause” and without notice as a result of any such breach. Contractors are required to advise their subcontractors and Personnel of the foregoing requirements prior to commencing work for Repsol or staying at a Camp. Repsol may also require anyone who refuses to comply with this Plan to be removed from the Repsol Facility.
- c. **Visitors:** Visitors to the Repsol Facility who fail to comply with this Plan and the Repsol Alcohol and Drug Policy will be removed from the Repsol Facility, their supervisors will be contacted (where applicable) and appropriate follow-up action will be taken.
- d. **Corrective Actions:** As a result of any infractions of this Plan or the Alcohol and Drug Policy Expectations for Contractors, Repsol will notify the individual’s supervisor and request they be removed from the Repsol Facility. The individual will be allowed to return to a Repsol Facility (same site or another site) if they:
  - have completed a fitness for duty assessment;
  - have successfully completed any prescribed treatment program;
  - have completed any return to work agreement;
  - have been cleared by the Contractor to conduct safety sensitive work; and,
  - all of this information has been reviewed and approved by Repsol’s Occupational Health Department and approved by the Repsol supervisor for which the individual would be conducting work.

Continuous infractions by an individual could result in permanent termination from all Repsol Facilities.

- e. Appropriate sanctions will depend upon the facts, including the nature of the violation, the existence of prior violations, the response to prior sanctions and any other matters that are considered relevant by the supervisors and Human Resources representatives responsible for the sanctions.
- f. Repsol expects Contractors to manage their employees properly if dismissed from the Camp pursuant to their Drug and Alcohol Policy. It is also expected that a representative from the Contractor will follow-up in a timely manner with Repsol's Occupational Health Department or a Repsol representative on the status of the individual.

**10. AMENDMENT**

This Search Plan may be updated and modified as required and as directed by Repsol. Any such changes may be implemented once they have been communicated to Repsol Contractors, Workers or visitors who may be staying or working at a Repsol Facility.

REPSOL FACILITY ALCOHOL & DRUG SEARCH PLAN				
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0		Original Issue of Plan	- Peter Vanderwater, Corporate Security - Karen West, Legal	- Rob Riecken, VP CDC & SCM - Kyle Hegel Mgr. HSE-OI
1	Feb 12, 2016	Update to include Repsol Facilities	- Peter Vanderwater, Corporate Security - Karen West, Legal	- Rob Riecken, VP CDC & SCM - Kyle Hegel Mgr. HSE-OI