



US Drug & Alcohol Workplace Policy

Policy Statement

Keyera is committed to the health, safety and wellness of employees, workers, contractors, and the public. Workers who are under the influence of Alcohol or Drugs threaten personal and public safety and the environment, compromise the quality of our customer service, and adversely affect the reputation and goodwill of Keyera. This Policy is a reminder of the risks associated with the use of Alcohol and Drugs and sets out how Keyera will respond when individual actions jeopardize the safety of the workplace.

Objectives

The objectives of this Policy are:

1. To support Keyera's commitment to promoting a safe and healthy workplace by deterring the use of Alcohol, Drugs and other substances that impair the ability of workers to perform their jobs safely;
2. To outline Keyera's expectations and requirements for appropriate behaviour and to provide consistent guidelines for all workers; and
3. To establish consequences for non-compliance

Scope

This Policy applies to all Keyera employees. This Policy also applies to all contractors engaged by Keyera ("Contractors"). See the heading titled "Contractors" for further information with respect to how this Policy applies to Contractors, including any employees, agents, consultants, subcontractors and other workers engaged by such Contractors (collectively referred to as "Contractor Workers").

Principles

This Policy is founded on the principles of awareness, prevention and providing a safe work environment. In the workplace environment, Keyera expects all workers to be Fit for Work and will not tolerate inappropriate use of Alcohol or Drugs. Some examples of unacceptable activities include:

- Using, consuming, offering for sale, selling or manufacturing Alcohol while on Keyera Premises;
- Possessing Alcohol while on Keyera Premises without the prior approval of management unless it is in sealed (unopened) packaging;
- Using, consuming, possessing, distributing, offering for sale, selling, growing, cultivating or manufacturing Illicit Drugs while on Keyera Premises or conducting Keyera Business;
- Using, consuming or possessing Drugs of Concern while on Keyera Premises or conducting Keyera Business unless: (i) the employee has provided Keyera with adequate prior disclosure with respect to the use, consumption and possession of the Drug of Concern as part of medical treatment or accommodation plan, (ii) Keyera has agreed to accept the employee's use, consumption or possession of the Drug of Concern, including any conditions related to such use as necessary to

maintain a safe workplace; and (iii) any modifications, restrictions or prohibitions required by Keyera to maintain a safe workplace are followed by the employee;

- Distributing, offering for sale, selling, growing, cultivating or manufacturing Drugs of Concern while on Keyera Premises or conducting Keyera Business;
- Misusing Medications while on Keyera Premises or conducting Keyera Business;
- Using, possessing, distributing, offering for sale, selling or manufacturing Drug Paraphernalia while on Keyera Premises or conducting Keyera Business;
- Tampering with any Alcohol or Drug test sample or using, consuming, possessing, distributing, selling or manufacturing any product or device that could be used to tamper with such samples;
- Reporting for work or being at work when not Fit for Work due to use or consumption of Alcohol or Drugs;
- Operating any Keyera Vehicle (including a personal vehicle while conducting Keyera Business) when not Fit for Work due to the use or consumption of Alcohol or Drugs; and
- Refusing to cooperate with an investigation, including testing and searches in accordance with this Policy.

Responsibilities

Management

- Communicate this Policy (and any key changes to it) to all employees and Contractors.
- Implement information and education programs for employees regarding the effects of using or abusing Alcohol or Drugs.
- Train supervisors to recognize and handle performance problems related to Alcohol or Drug use promptly and appropriately.
- Deal promptly with an actual or perceived Alcohol or Drug problems in consultation with Human Resources.
- In appropriate circumstances, refer employees affected by substance abuse for counseling and treatment.
- Monitor performance after an employee returns to work from Drug and/or Alcohol treatment, assisting the employee as necessary.
- Authorize, in consultation with Human Resources, Alcohol and Drug testing and/or searches only in accordance with this Policy.
- Follow-up on concerns and allegations with respect to noncompliance with this Policy.
- Respect the confidentiality and privacy of employees and comply with applicable privacy laws in the implementation and enforcement of this Policy.

Supervisors

- Attend training and awareness programs as directed by Keyera and advise employees of available assistance to deal with an emerging or existing substance abuse problem or dependency.
- Monitor employees for fitness for work in accordance with this Policy and Keyera's Fit for Work Policy.
- Document any evidence of Alcohol or Drug use and/or impairment and report such instances immediately.
- initiate the authorization of Alcohol and Drug testing and/or searches in consultation with the next level of management and Human Resources and only in accordance with this Policy.
- Take immediate action to address and in some cases remove from the job, as unobtrusively as possible, an employee who appears not to be Fit for Work in accordance with this Policy and any related guidelines or procedures.
- Follow up on concerns and allegations with respect to noncompliance with this Policy.
- Respect the confidentiality and privacy of employees and comply with applicable privacy laws in the Implementation and enforcement of this Policy.

Employees

- Report to work Fit for Work, and remain Fit for Work, while on Keyera Premises and while conducting Keyera Business (including while formally on call).
- Read and understand this Policy, and complete an employee acknowledgement from time to time as required by Keyera, in order to confirm understanding of and compliance with this Policy in the course of performing work in a safe manner.
- Identify and report the possible violations of this Policy to a supervisor.
- Self-report any personal use of Drugs or Alcohol that may affect work performance.
- Use Medications responsibly. Only use prescribed Medications for which they have a legally obtained prescription.
- Investigate (through a doctor, pharmacist or health care professional) whether any Medication they are taking or may take is a Drug of Concern. If it is a Drug of Concern, Employees must: advise their supervisor of their use of the Drug of Concern; provide sufficient information for Keyera to identify necessary precautions; use safe alternative treatments when available; and follow applicable recommended courses of action, including complying with any work modifications, restrictions or prohibitions.
- Seek counseling and accept the necessary treatment as prescribed for an emerging or existent Alcohol or Drug problem before the problem adversely affects job performance.
- Follow any recommended monitoring or follow-up program as part of rehabilitation from an Alcohol or Drug dependency.
- Cooperate fully during investigations, including testing referrals and Searches, in accordance with this Policy.

An employee who is formally on-call must remain Fit for Work during the hours they are formally on-call. An employee shall not accept work (either while formally on-call or upon receipt of an after-hours call out to perform unscheduled work) if they have consumed Alcohol or Drugs such that they would not be Fit for Work and may be removed from the

on-call or call-out list for that day, or for a longer period, until he or she is determined to be Fit for Work.

Contractors

Contractors must have in place and enforce a drug and alcohol policy that meets or exceeds the standards of this Policy. If a Contractor does not have a drug and alcohol policy in place that is acceptable to Keyera, the Contractor and all Contractor Workers shall be required to comply with this Policy while on Keyera Premises and while conducting Keyera Business. It is the responsibility of the Contractor to ensure that its Contractor Workers comply with the Contractor's drug and alcohol policy (or this Policy as applicable) while on Keyera Premises or conducting Keyera Business.

Keyera may, at its discretion, require a Contractor to certify that all its Contractor Workers that work on Keyera Premises filling Safety Sensitive Positions have been tested for Alcohol and Drugs with a negative test result within the preceding 12 months before being allowed access to Keyera Premises. Further or in the alternative, Keyera may, at its discretion, require a Contractor and/or Contractor Workers to undergo pre-access testing prior to being allowed access to Keyera Premises.

Contractors and their Contractor Workers are required to cooperate with any investigation initiated by Keyera, including post-incident or reasonable cause testing by Keyera. In the event a Contractor conducts an investigation, tests its Contractor Workers or conducts Searches, it shall share its findings and any remedial actions with Keyera.

Contractors must advise their Contractor Workers that Keyera may conduct Searches on Keyera Premises (including Searches of any vehicles or other personal property brought onto Keyera Premises) and of their obligation to cooperate with such Searches.

Keyera reserves the right to refuse access to Keyera Premises to a Contractor and/or Contractor Workers where in the sole opinion of Keyera, it may present a risk to the safety of any person or property at the Keyera Premises.

Contractors that are unable to demonstrate that they actively manage risks associated with Drugs and Alcohol will be considered to be in breach of this Policy. If a Contractor or any of its Contractor Workers fail to comply with this Policy, the Contractor's agreement with Keyera may be terminated and/or Contractor Workers may be refused access to Keyera Premises, all at Keyera's sole discretion.

Any costs incurred in connection with the enforcement of or a violation of this Policy by a Contractor or its Contractor Workers shall be the responsibility of such Contractor.

Deterring and Detecting Breaches of This Policy

Pre-employment testing (Safety Sensitive Positions) - Prospective employment candidates for Safety Sensitive Positions are required to sign a pre-employment testing consent form at the interview stage whereby they consent to pre-employment testing and agree to the release of the results of such tests to Keyera. Any offer of employment will be conditional on the candidate passing a post-offer, pre-employment test for the presence of Drugs and/or Alcohol in their system. These screening tests will be conducted before the employee reports for work but after a conditional offer of employment has been made. A negative test result is also a condition of an existing employee being transferred into a Safety Sensitive Position.

Testing Required by Law – Employees are required to comply with all Drug and/or Alcohol testing required by applicable local, state or federal laws, including but not limited to testing required by the U.S. Department of Transportation (and its agencies), the Pipeline & Hazardous Materials Safety Administration (PHMSA) and the Federal Motor Carrier Safety Administration (FMCSA).

Random Testing - To the extent permitted by local, state or federal law, employees working in safety sensitive positions may be subject to random Drug and/or Alcohol testing at any time during work hours without prior notice. Keyera shall not apply such random testing in a manner that is discriminatory.

Reasonable Cause Testing - In situations when the supervisor or manager of an employee has reasonable grounds to believe an employee is not Fit for Work due to possible use or consumption of Drugs or Alcohol, the employee will be escorted to a safe place and given an opportunity to explain why they appear to be in a condition that is not Fit for Work. The supervisor conducting the interview shall consult with a second person at the next level of management and Human Resources, and if after such consultation, it is determined that there are reasonable grounds to believe that Alcohol or Drug use may be a factor in the situation, the employee shall be required to submit to an Alcohol and/or Drug test as soon as practical, subject always to ensuring that the employee receives appropriate medical attention if there are immediate medical concerns.

A decision as to whether reasonable grounds exist will be based on observation of the employee's conduct, including: inappropriate use or evidence of inappropriate use of Alcohol or Drugs, changes in job performance, erratic or atypical behavior, changes in physical appearance, changes in speech patterns and/or the presence or suspected presence of Alcohol, Drugs or Drug Paraphernalia. Written documentation describing the circumstances and/or behaviors on which the decision to test was made will be completed, dated and signed by the supervisor or manager. A copy of the documentation will subsequently be made available to the employee on request.

Post Incident Testing - Alcohol and Drug testing is required after a Significant Incident in accordance with the following:

- The need for a test must be documented as part of the preliminary investigation as soon as practical after the triggering event;

- A test will not be necessary if there is clear evidence that acts or omissions of employee(s) could not have been a contributing factor (for example, structural or mechanical failure);
- Employees referred for testing will only be those who are identified as having been involved in the chain of acts or omissions leading up to the incident;
- Employee(s) will be tested as soon as reasonably practical following the incident; and
- Employee(s) at the Keyera Premises at the time of the event must not consume or otherwise use Alcohol or Drugs (except prescribed Medications taken in accordance with the prescription) or Masking Agents prior to testing being completed or until they have been advised that a test is not required.

In addition to Alcohol and Drug testing after a Significant Incident, Alcohol and Drug testing (in accordance with the above) may also be required in the following circumstances:

- After any work accident, incident or near miss, if, as part a preliminary review or investigation into the matter, it is reasonable to believe that Alcohol or Drug use may have been a factor; and
- After any other serious incident, accident or near miss if it is determined to be necessary as part of a complete investigation.

In all cases, a decision to test will be made collaboratively by the supervisor (or investigator as the case may be), in consultation with a second person at the next level of management and Human Resources.

Return to Duty Testing - Post Violation - In those situations where employment is continued after a positive test, employees will be required to pass a return to duty test and may be subject to unannounced testing for a minimum of two (2) years as a condition of continued employment.

Return to Duty Testing - Post Treatment - Any employee assuming duties after primary treatment for an Alcohol or Drug problem which resulted from a work performance-related incident will be required to pass a return to duty test. In addition, they may be subject to unannounced testing with a case-specific program designed to support their ongoing recovery.

Searches on Keyera Premises – Searches, including Searches of any vehicles or other personal property brought onto Keyera Premises, may be conducted if there are reasonable grounds to believe that Alcohol, Drugs or Drug Paraphernalia are present on any Keyera Premises in violation of this Policy. A decision (a) to conduct a Search, (b) to refer the matter to law enforcement, and/or (c) to pursue an alternate means of investigating the matter will be made collaboratively by the supervisor, in consultation with a second person at the next level of management and Human Resources. Reasonable grounds for conducting a Search may be based on a combination of indicators, including but not limited to behaviour, odor, presence of Alcohol or Drug containers, or presence of Drug Paraphernalia. Searches may be conducted by Keyera personnel or by trained third parties retained by Keyera for the purpose of carrying out such Searches (including sniffer dogs and their handlers). Any items (Alcohol, Drugs or Drug Paraphernalia) found on

Keyera Premises contrary to the Policy will be seized and documented and will not be returned. A refusal to cooperate or attempt to interfere with a Search is a breach of this Policy

Drug and Alcohol Testing

Testing Thresholds - Alcohol and Drug test results shall be considered positive when they equal or exceed the concentrations set out in Appendix "B". A refusal to test shall be deemed to be a positive test result.

Testing Protocols – Testing will be carried out in accordance with standards established by the U.S. Department of Health and Human Services and accepted in Canada.

Testing will be completed as soon as reasonably practical following the incident or the identification of reasonable cause, and in an event within 8 hours for Alcohol testing and within 32 hours for Drug testing.

The employee subject to the testing will be provided with transportation and escorted to the collection site or hospital/clinic if immediate medical care is required. If the testing is to be completed on-site, the employee will be supervised until the qualified testing technician arrives. Upon completion of the testing and/or release from the hospital/clinic, the employee will be transported to their local place of residence or to the care of another adult person. If the employee refuses alternate transportation or insists on driving, and is suspected of being impaired by Alcohol or Drugs, the employee shall not be permitted to drive a Keyera Vehicle (and in the event the employee drives away in another vehicle, law enforcement authorities shall be notified).

Keyera recognizes that it may not be possible to test an employee after an incident that renders him or her incapable of giving informed consent. Keyera also recognizes that in some circumstances, regulatory or law enforcement authorities may conduct their own investigations which may limit Keyera's ability to conduct testing in the course of its own investigation.

Other Circumstances

Impaired Driving Charges - Employees who operate a Keyera Vehicle are required to maintain a valid driver's license for the applicable class operation. Any loss of license must be reported immediately to management, and the employee will no longer be qualified to drive on behalf of Keyera.

In addition, employees must inform their supervisor immediately if they have been charged with an impaired driving offense when operating a vehicle on behalf of Keyera. Impaired driving would include but not be restricted to exceeding the legal blood Alcohol content in that jurisdiction, driving while impaired, or refusal to blow into a breath analyzer. Receipt of a charge will result in an investigation and discipline appropriate to the situation.

Social Functions - The use, possession and offering for sale of Alcohol is permitted at Keyera sponsored celebrations, business functions or social functions with prior approval of management. Alcohol consumption at such events shall be reasonable and controlled, and safe transportation arrangements shall be made available. Every employee is responsible for seeking out and making appropriate use of safe travel arrangements.

If Alcohol is made available during the course of conducting Keyera Business (including business meetings, lunches etc.), employees are expected to use good judgment, be responsible in hosting others and comply with their obligation to remain fit to perform their duties.

Customer Requested Testing or Site-Access Testing - From time to time it may be necessary for Keyera's employees to meet a customer's Drug and Alcohol testing requirements (which may differ from those outlined in this Policy, and could include random Drug or Alcohol testing) in order to qualify for work or to access their work sites or to enter into or work within a particular jurisdiction. Prior to agreeing to do so, Keyera will evaluate the appropriateness of such requirements and the adequacy of privacy protections given to employees who will be assigned to the project or site. An employee assigned such a project or site shall comply with the customer's Drug and Alcohol compliance requirements, whether arising from legislation or a policy, even if such policy imposes a higher standard than this Policy.

Employee Assistance

Keyera will make all reasonable efforts to assist and accommodate employees with substance abuse or dependency issues. In appropriate circumstances, assistance (including counselling, treatment, rehabilitation and family support services) is available for an employee who has self-declared a Drug or Alcohol dependency or who has received a positive Drug or Alcohol test result after testing. Keyera will evaluate each situation on a case by case basis, and may refer the employee to a Substance Abuse Professional ("SAP") in order to determine whether the employee has a Drug and/or Alcohol abuse or dependency issue. The employee must agree to the release of information from the SAP to Keyera.

Subject to the results of the evaluation by the SAP and before returning to work, the following conditions must be met:

- The employee must have successfully completed and complied with the recommendations of the SAP arising out of the evaluation and rehabilitation program (if any);
- A report from the SAP is received by Keyera confirming that the employee is ready to return to work;
- The employee must complete a return to work Alcohol and Drug test with a negative test result; and
- The employee must enter into a return to work agreement with Keyera outlining the conditions governing the return to work (including unscheduled testing in accordance with this Policy and the recommendations of the SAP) and the consequences for failing to meet such conditions.

If these conditions are met, the employee may be allowed to return to work or to a comparable position if Keyera or employee circumstances warrant a change of duties, shift or location. The employee will remain subject to all provisions of this Policy.

If an employee refuses to participate in a recommended rehabilitation or treatment program, or to sign the required return to work agreement or fails, without good reason, to

attend the return to duty test or complete the recommended education, rehabilitation or treatment program, the employee may face disciplinary action.

Employees are encouraged to access the Employee and Family Assistance Program (EFAP) which is designed to assist employees (and their dependents) who are experiencing personal or work-related problems, including those arising from Alcohol or Drug abuse. In addition, treatment for Alcoholism or Drug dependency or related disability is within the scope of the Short-Term Disability Plan, which maintains the employee's income during the rehabilitation period to the extent that benefits are available. For more information about the Keyera's Employee and Family Assistance Program EFAP or the Short -Term Disability Plan, contact the Human Resources Department.

Consequences for Failure to Comply with Policy

Failure to Comply - In all situations where there is a possible breach of this Policy, an investigation will be conducted before disciplinary action is taken. An employee who is suspected of violating this Policy may be placed on immediate suspension with pay or reassigned to other duties pending completion of the investigation.

Any employee who is found to have violated this Policy will be subject to disciplinary action, including but not necessarily limited to: a warning or reprimand; suspension; corrective action agreement; or termination for cause. The nature of the disciplinary action that may be imposed will depend on the facts of each case. Some of the factors that will be considered include the nature of the violation, the existence of prior violations, the response to prior treatment or corrective programs, and the seriousness of the violation.

Examples of Violations - A positive test result, being a result in excess of the thresholds specified in Appendix B, is considered a violation of this Policy and may result in further investigation and/or disciplinary action. Refusal to submit to a test, refusal to agree to disclosure of a test result to Keyera, a confirmed attempt to tamper with a test sample, failure to participate in a rehabilitation or treatment program as directed, failure to self-report and failure to report observations that suggest a worker is not Fit for Duty, failure to cooperate in a Search, and any other failure by an employee to comply with the obligations and responsibilities under this Policy are also examples of violations of this Policy that will be subject to disciplinary action.

Self-Disclosure - No employee with an Alcohol or Drug dependency will be disciplined or terminated for requesting help in overcoming a problem or because of involvement in a treatment or rehabilitation program. However, an employee with a substance dependency is expected to seek treatment prior to violating this Policy or putting their safety and the safety of other employees, the public or the environment at risk. Employees who believe they may be unable to comply with this Policy, and who notify Keyera as part of voluntarily seeking assistance before violating this Policy, will not be disciplined for requesting help.

Confidentiality and Privacy

Personal information, including test results relating to Alcohol and Drug tests and results of Searches, will be collected, used, and disclosed only for reasonable purposes that relate to employment (or in the case of Contractors, the engagement of Contractor and/or

Contractor Workers). These reasonable purposes include but are not limited to: mitigating health and safety risks; determining whether an employee, Contractor or Contractor Worker is Fit for Work; enforcing and monitoring compliance with this Policy; making referrals for further medical assessment and rehabilitation; accommodating return to work; and disciplinary action, up to and including termination of employment, termination of contract and/or denial of site access to Keyera Premises. Testing and Search results will be stored in a secure location and will only be shared with those persons who have a legitimate need to know the information for the purposes identified above. Search results may be shared with third parties, including law enforcement authorities (and in the case of a Contractor Worker, the Contractor Worker’s employer, manager or supervisor), that have a legitimate need to know pursuant to this Policy. All personal information will be treated in accordance with applicable privacy legislation and Keyera’s Privacy Policy.

Contact Information

General Information: For further information or clarification on this Policy, please contact your supervisor or the Human Resources Department.

Human Resources Contacts for Testing and Searching Assistance: For assistance in arranging for testing or search resources contact Human Resources at the numbers below:

Keyera Human Resources:

- Desiree Crawford: 587-496-8099
- Reid Simonton: 403-540-6246
- Cindy Ries: 403-869-7437

US Drug and Alcohol Workplace Policy	EFFECTIVE DATE	October 2017
	MODIFIED	October 2018
	PREVIOUS REVISION(S)	Replaces Keyera’s “Drug and Alcohol Workplace Policy” for workers in the U.S.
	AUTHOR	Human Resources
	MODIFIED BY	Human Resources, Safety & Legal

Definitions

<u>Alcohol</u>	Means the intoxicating agent in beverage Alcohol (such as in beer, wine and distilled spirits), ethyl Alcohol, or other low molecular weight Alcohols including methyl and isopropyl Alcohol. It also includes the intoxicating agent found in medicines or other products. References to use or possession of Alcohol include use or possession of any beverage, mixture, or preparation containing Alcohol.
<u>Drug</u>	<p>Means any substance, including but not limited to Illicit Drugs, Drugs of Concern and other substances the use of which changes or has the potential to change or adversely affect the way a person thinks, feels or acts or which may inhibit a worker's ability to perform his or her job safety and productively. For clarity Drug does not include Medication.</p> <p>Illicit Drug means any drug or substance that is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law (e.g. street drugs).</p> <p>Medication means a drug obtained legally over-the-counter (non-prescription) or through a doctor's prescription for the employee and that is not a Drug of Concern.</p> <p>Drug of Concern means any drug or substance that is legally obtainable (with or without a prescription) and that changes or has the potential to change or adversely affect the way a person thinks, feels or acts or which may inhibit a worker's ability to perform his or her job safely and productively.</p>
<u>Drug Paraphernalia</u>	Means any equipment, product or material intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing or

	<p>introducing Alcohol or Drugs into the human body. This includes any product or device that may be used to attempt to mask, tamper with or adulterate an Alcohol or Drug testing sample.</p>
<p><u>Fit for Work</u></p>	<p>In the context of this Policy means being able to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of Alcohol, Drugs, or other substances. For clarity an employee who has:</p> <ul style="list-style-type: none"> • an Alcohol level equal to or greater than 0.04 grams per 210 liters of breath(0.04 grams of Alcohol per 100 milliliters of blood); or • a Drug level equal to or in excess of the concentration cut-off levels stipulated in Appendix B (noting that Keyera does not condone any use of Illicit Drugs) shall be deemed not to be Fit for Work.
<p><u>Keyera Business</u></p>	<p>Refers to all business activities undertaken in the course of Keyera's operations conducted on or off Keyera Premises. It includes situations when an individual is representing or could reasonably be perceived as representing Keyera in the performance of duties.</p>
<p><u>Keyera Premises</u></p>	<p>Includes, but is not necessarily restricted to, all land, roads, property, structures, installations, vehicles and equipment owned, operated, rented leased, operated or otherwise controlled by Keyera in connection with its business. For clarity, Keyera Premises includes camp facilities, including third party camp facilities that are rented, leased or otherwise contracted by Keyera For the purpose of providing accommodations for Keyera employees.</p>
<p><u>Keyera Vehicle</u></p>	<p>Means a vehicle whether owned, leased, rented or otherwise directly controlled by Keyera or a personal vehicle of an employee when that person is on Keyera Business.</p>

Safety Sensitive Position

Means a position in which performance impaired by Alcohol or Drugs could result in a serious incident affecting the health or safety of employees, others workers, the public or the environment or an inadequate response to an emergency or operational situation. In designating a position as a safety sensitive position, the nature of the facility, level of risk associated with the tasks expected to be performed in the position, the level of supervision of the position and the presence other operational checks, balances and oversight of the position. (Refer to Appendix 'A' - Safety Sensitive Matrix to determine if a position has been designated as a safety-sensitive position). All employees will be advised if their position has been designated as a safety-sensitive position.

Significant Incident

Means an accident or incident resulting in:

- A fatality or serious personal injury or hospitalization;
- An environmental spill with significant implications;
- Significant loss or damage to property, equipment or vehicles; or
- A significant loss of Keyera revenues or the payment of significant damages.

To assist in the classification of a significant incident, reference should be made to Keyera's corporate risk matrix attached as Appendix "C" (as may be amended from time to time). Incidents that are categorized as 'High Risk' will be considered Significant Incidents and incidents that are categorized as 'Medium Risk' may be considered Significant Incidents.

Search

Means physically inspecting a Keyera Premises, including any personal property (including employee and contractor property located on Keyera Premises, such as vehicles, assigned rooms at camps, offices, lockers, luggage and common areas) for the purpose of determining compliance with this policy and may

	include hand searches or the use of sniffer dogs.
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Appendix “A” SAFETY-SENSITIVE POSITION MATRIX (Based on “The Safety Association for Canada’s Upstream Oil & Gas Industry” Matrix developed by Enform and adapted by Keyera to reflect its assessment of its facilities, operations and work activities)

This matrix is an assessment tool that can be used to identify positions that may be safety-sensitive based on work activities and work environment.

	Severity of Work Environment Exposure	Severity of Work Activity	Work Activity					Area of Impact				
			1	2	3	4	5	People	Environment	Assets	Reputation	
		Categories	<ul style="list-style-type: none"> Admin duties Office-based computer support Cleaning/janitorial services 	<ul style="list-style-type: none"> Abandonment/ remediation 	<ul style="list-style-type: none"> Operations/ maintenance Supervisory management Technical work Camp licensed food services 	<ul style="list-style-type: none"> Drilling Seismic Heavy equipment transport Completion s/ well services Safety watch Hot work 	<ul style="list-style-type: none"> Product or hazardous goods transport Multiple person transport Emergency response 					
Work Environment [®]	1	<ul style="list-style-type: none"> Non-operating locations 	NON-SAFETY-SENSITIVE					Slight injury (first aid)	Slight	Slight damage <10K	Slight	
	2	<ul style="list-style-type: none"> Low-risk locations 						Minor injury (medical aid)	Minor	Minor damage <100K	Limited	
	3	<ul style="list-style-type: none"> Production facilities Pipelines Proximity to sensitive environment Green field site Shop yard manufacturing Camps 							Major injury (LTI)	Localized	Localize damage <500K	Considerable
	4	<ul style="list-style-type: none"> Exposure to hazards Rig site Time of day Working alone Brown field site 			SAFETY-SENSITIVE				Fatality	Major	Major damage <1mil	National
	5	<ul style="list-style-type: none"> Remote (re: access to health care) Offshore 							Multiple fatalities	Massive	Extensive damage	

APPENDIX “B” TESTING PARAMETERS

Alcohol - A blood alcohol concentration that is confirmed at to be equal to or greater than 0.04 grams of alcohol per 100 milliliters of blood (0.040 grams per 210 litres of breath). If the result is over 0.00 but less than 0.04, the test is considered negative, however, the employee will be instructed to go home and return to work at their next scheduled workday, and the test results will be noted. A second event and test within this blood alcohol range and within the 12-month rolling period may result in disciplinary action.

Drugs - Drug testing will be dealt with according to the following table

Drugs or classes of drugs	Urine	Urine	Oral Fluid	Oral Fluid
	Screening concentration equal to or in excess of ng/mL	Confirmation Concentration equal to or in excess of ng/mL	Screening concentration equal to or in excess of ng/mL	Confirmation Concentration equal to or in excess of ng/mL
Cannabinoids	50	15	4	2
Cocaine	150	100	20	8
Opiates	2000	2000	40	40
PCP	25	25	10	10
Amphetamines	500	250	50	50
Methamphetamine	500	250	50	50
Methadone	300	100	50	20
MDMA (Ecstasy)	500	250	50	50
Propoxyphene	300	n/a	20	10
Barbituarates	300	100	50	50
Benzodiazepines	100	50	10	10
Oxycodone	100	100	10	10 *express 40 *lab based

If the result is over 0 but less than the screening concentration or confirmation concentration amount for a particular drug, the test is considered negative, however, the employee will be instructed to go home and return to work at his/her next scheduled workday, and the test results will be noted. A second event and test within this range and within the 12-month rolling period may result in disciplinary action.

APPENDIX “C” KEYERA RISK MATRIX

Keyera Risk Matrix

To use this matrix, follow these steps:

1. Determine the severity for the applicable consequences.
2. Determine the likelihood for the applicable consequences.
3. Find the intersection between the severity and likelihood to determine the risk level.
4. Use the number legend at the bottom to determine the action required to be taken for the associated level of risk (low, medium, or high).

Severity	Consequences				Industry Likelihood				
	Health and Safety/ Personnel	Environmental*	Public/ Stakeholder Reputation	Equipment, Materials, Project Cost, and Revenue	Frequent	Occasional	Seldom	Unlikely	Remote
					Similar event likely to occur (1 occurrence per year)	Similar event may occur on occasion (1 occurrence every 5 years)	Similar event may occur but seldom (1 occurrence every 10 years)	Similar event unlikely to occur (1 occurrence every 20 years)	Reasonable to expect a similar event won't occur, but has happened in industry
Catastrophic	Fatality, permanent disability, or multiple casualties.	Impact to public health, streams, water bodies, vegetation, air, ground-water, etc. Regulatory reporting is required.	Directly impacts 100 or more people or causes national attention.	Group 1 Corporation Loss > \$20 million	9	8	7	6	5
Critical	Lost time, long term disability (> 26 weeks), or serious injury.	Repeated non-compliance issues or one time incident with long term or significant impact. Regulatory reporting is required.	Directly impacts 25 to 100 people or causes provincial attention.	Group 2 Corporation Loss \$2 million to \$10 million (VP)	8	7	6	5	4
Marginal	Lost time, short term disability (1 day to 26 weeks).	Contained within facility, repeated issues or one time incident with significant impact. Regulatory reporting is required.	Directly impacts < 25 people or causes municipal or community attention.	Group 3 Corporation Loss \$100,000 to \$2 million (Director)	7	6	5	4	3
Minor	Medical aid.	Contained within facility, minimal impact which poses no long term threat to the environment. Regulatory reporting is required.	Directly impacts 1 to 5 people or causes local attention.	Group 4 Corporation Loss \$50,000 to \$100,000 (PM/Manager)	6	5	4	3	2
Negligible	First aid.	Contained at source, no significant environmental impact. Release volume below reportable levels/volumes.	No public awareness or no public concern.	Group 4 Corporation Loss \$0 to \$50,000 (Staff)	5	4	3	2	1

7-9 = High risk – unacceptable: STOP! Mitigation required to reduce or control the risk to medium or low.

5-6 = Medium risk – undesirable: Further analysis must be conducted to reduce the risk to the lowest practicable level, using the hierarchy of controls (elimination, substitution, engineering, administrative, and PPE).

1-4 = Low risk – acceptable with controls: Mitigate as necessary to manage risk.

*Note: Additional details are available with corporate environmental group.