

## 1. Purpose:

To outline the process for the prevention, detection and management of drug and alcohol misuse in the workplace.

## 2. Scope:

This protocol applies to all persons engaging in work on a Metcash workplace, undertaking work on behalf of Metcash.

## 3. Process

### Drug and Alcohol

#### 3.1. Drug and alcohol use

Metcash recognises the inherent risks associated with alcohol consumption and drug use including potential for individuals to have impaired decision making, delayed responses and a range of other symptoms, which in a workplace environment can place themselves and others at risk of harm.

#### *Prohibited use*

- The consumption, sale, supply or possession of illegal drugs on a Metcash site will be referred to the Police.
- The consumption of alcohol is not permitted at Metcash sites, or while undertaking work for Metcash, except as provided for in Section 3.2 ***Permitted drug and alcohol use.***

#### *Workplace limits*

A team member or contractor must not exceed the applicable workplace limit of an alcohol or drug.

|                                                                                                                                                                                                                                   | Operating plant or Working in a Warehouse/Wholesale/Trade Yard Environment           | Heavy vehicles, Company provided, and other passenger vehicles used for work purposes                                                 | Office and other environments including retail stores |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| Alcohol                                                                                                                                                                                                                           | 0.000                                                                                | Per the relevant legislated Blood Alcohol Concentration (BAC) limit for the team member's licence requirements to complete their work | 0.000                                                 |
| Drugs including (but not limited to) <ul style="list-style-type: none"> <li>• Amphetamine Type Stimulants</li> <li>• Benzodiazepines</li> <li>• Cannabis Metabolites</li> <li>• Cocaine Metabolites</li> <li>• Opiates</li> </ul> | Screening cut-off levels defined in AS/NZS 4760: (Oral Fluid) or AS/NZS 4308 (Urine) |                                                                                                                                       |                                                       |

### 3.2. Permitted drug and alcohol use

#### *Medications*

- Prescription and over the counter medications should be taken in accordance with the directions of a doctor, pharmacist or pharmaceutical manufacturer.
- Team members/contractors taking medications which could cause drowsiness, adverse side effects, or impair a person's judgement or reactions must notify their supervisor. If in doubt team members / contractors must notify their supervisor.
- A person who is impaired by medication may be required to take personal leave or other appropriate leave, where they are at risk of harm due to the medication being used.

#### *Approved functions and tasting*

There may be occasions where team members and/or contractors may consume alcohol at functions authorised by the Metcash Group. These may include:

- Approved team functions / company dinners
- Customer and sales events / Expos
- Product tasting sessions (including alcohol tasting)

On such occasions, alcohol may be served and if consumed by a team member or contractor must be consumed in a responsible manner.

The relevant General Manager or their nominated representative will be responsible for the "Responsible Service of Alcohol" under the relevant legislation, as well as ensuring the safety of people during the event. This includes consideration of safe travel to and from the event.

Where possible, [approved functions](#) authorised by Metcash Group should be:

- Conducted at the end of the working hours of the people attending the function;
- Be accompanied by the service of food.

Where an approved function introduces realistic potential for BAC levels to exceed legislated BAC limits:

- Pre function communication is to remind personnel of obligations regarding responsible consumption of alcohol;
- Personnel must not return to work after the function if it is likely that their BAC exceeds the legislated limits;
- The approved function is to be excluded from the random testing process.

### Testing

#### 3.3. Testing process

##### *Random drug and alcohol*

- Risk of injury is used in determining the frequency of testing to be undertaken.
- Warehouse/Wholesale/Trade Yard environment operational sites which utilise equipment such as forklifts etc. are considered high risk whereas office environments are considered low risk.
- High risk sites will establish and maintain a random drug and alcohol test program that is of sufficient frequency and duration to test a majority of team members/contractors over a period of 12 months.
  - NB: this may include an option for blanket testing of all team members/contractors in a single event.
- Low risk sites will establish and maintain a random drug and alcohol test program that ensures a representative portion of personnel on the site is subjected to testing at least once per year.

- Testing will be conducted by an accredited testing agency using approved detection devices.
- Tests will be conducted at random times and days.
- Test subjects will be selected through a random selection process.
- Selected team members/contractors must provide photo identification, sign appropriate consent forms and participate in testing.

### *'For cause'/challenge*

Where a reasonable suspicion exists that a team member or contractor has attended for work with a drug or blood alcohol level in excess of the permissible limits a 'for cause' test may be undertaken.

- The team member/contractor's direct manager / supervisor is to consult with a Safety, Health and Environment (SHE) representative and/or a team member representative and advise that they will be conducting 'for cause'/challenge testing. NB: If required, contact Metcash People and Culture.
- The reasons for the test should be clearly explained prior to undertaking the test.
- To protect the team member/contractor's privacy and confidentiality, wherever possible, the supervisor and SHE team member should approach the team member/contractor without drawing unnecessary attention to the communication.
- When approaching team members/contractors suspected of being unfit for work, their manager/supervisor should:
  - Avoid being confrontational and remain calm;
  - Take the person aside wherever possible and give clear, brief and firm instructions;
  - Take the person to a private location to conduct an initial test.
- Metcash team members that have undergone the accredited training and been deemed Accredited Testers may conduct testing in accordance with device manufacturer/supplier instructions.
  - NB: Where no trained Metcash team members exist, refer to **3.8 Accredited testing agency**.
- Where an initial drug test is non-negative, a Metcash representative will:
  - Immediately contact the testing agency and request an onsite confirmation test;
    - NB: where an accredited testing agency has provided the Accredited Tester for the initial testing, the accredited testing agency will also complete the confirmatory testing.
  - If there is an unreasonable delay, arrange for the team member/contractor to be taken to an appropriate medical clinic for a confirmation test to be conducted;
  - Keep the team member/contractor in a location where they can remain under observation while waiting for the test.
- Where an initial breath sample alcohol test is non-negative, a Metcash representative will:
  - Confirm the device used is a current calibrated instrument (if Metcash owned devices are used);
  - Obtain an independent person to observe subsequent samples;
  - Record the details of the result immediately.

### *Post incident (On site)*

Following an incident involving the operation of mobile plant or vehicles, where it has been deemed that the actions of the individual directly led/contributed to the outcome of an incident, a drug and alcohol test must be conducted.

- Tests should be conducted in a private location.
- A witness may be present if requested by the team member/contractor.
- A trained Metcash team member in the accredited training and deemed an Accredited Tester may conduct testing in accordance with device manufacturer/supplier instructions.
  - NB: Where no trained Metcash team members exist, refer to **3.8**.

- Where an initial drug test is non-negative:
  - Immediately contact the testing agency and request an onsite confirmation test;
  - If there is an unreasonable delay arrange for the team member/contractor to be taken to an appropriate medical clinic for a confirmation test to be conducted;
  - Keep the team member/contractor in a location where they can remain under observation while waiting for the test.
- Where an initial breath sample alcohol test is non-negative:
  - Confirm the device used is a current calibrated instrument (if Metcash owned devices are used);
  - Obtain an independent person to observe subsequent samples;
  - Record the details of the result immediately.

### *Post incident (Off Site)*

Following an off-site incident involving the operation of vehicles, where it has been deemed that the actions of the individual directly led/contributed to the outcome of an incident, a drug and alcohol test may be conducted at Metcash's request. NB: All drivers are required to adhere to local road rules and regulations.

### *Refusal to Participate*

If a team member/contractor refuses testing in accordance with this protocol (whether the testing is random, for cause/challenge or post-incident), such refusal will be deemed as a confirmed **Positive**.

## **3.4. Non-negative results**

- Non-negative drug test samples will be subject to confirmation at an accredited laboratory.
- Non-negative alcohol breath samples will be confirmed through subsequent breath test after 20 minutes.
- Team members/contractors will be suspended from all work activities while results are confirmed.

## **3.5. Reasonable Management Action**

Any team member/contractor who attends for work and has a confirmed positive drug or alcohol limit that exceeds the cut off will be deemed by Metcash as having engaged in serious misconduct and will be subject to disciplinary action up to and including termination. The team member/contractor will remain suspended, on pay, while the disciplinary process is undertaken.

Arrangements must be made to ensure the team member/contractor is transported home safely. Where a team member/contractor refuses transport and attempts to drive after returning a non-negative result, Police should be notified immediately.

## **3.6. Chain of custody and record keeping**

Accredited testers must collect samples and maintain records in accordance with relevant Australian/New Zealand Standards (AS/NZS).

- The relevant chain of custody form must be completed by the collector and the donor.
- The form must be completed fully and note:
  - Informed consent had been provided;
  - The donor's identity has been unequivocally provided ie. the donor is identified by at least name and date of birth;
  - The date and time of specimen collection is noted;
  - Details of the device and its lot number are recorded;
  - Confirmation that the donor has provided the specimen;
  - Details and signature of the collector;

- Details of the testing and results.
- Records must be maintained by the testing agency.
- Subject to the following point, results will only be disclosed to the Metcash contact and the team member's/contractor's relevant manager/s.
- Where the team member's results exceed legal/accepted limits, the matter will be referred to People & Culture for guidance.

### 3.7. Testing devices

Sites will obtain and maintain appropriate devices for initial drug and alcohol testing where Metcash team members are undertaking Accredited Testing. Otherwise the devices shall be provided by the Accredited Testing Agency.

Testing should be conducted in accordance with the relevant Australian/New Zealand Standards and compliant with the device manufacturers instructions:

- AS 3547: Breath alcohol testing devices for personal use
- AS/NZS 4760: Procedures for specimen collection and the detection and quantitation of drugs in oral fluid
- AS/NZS 4308: Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.

Devices must be compliant with the applicable testing standard. NB: Where an accredited testing agency completes the testing, checks for this should be completed as part of Contractor Management processes.

### 3.8. Accredited testing agency

Sites will engage the services of an accredited testing agency to provide random onsite drug and alcohol testing and confirmation testing.

Sites will engage the services of an accredited testing agency to provide 'for cause/challenge' testing and 'post incident' testing where no onsite Metcash team members exist that have undergone the accredited training and been deemed accredited testers.

### 3.9. Disclosure

Where a team member/contractor attends for work and, prior to commencing duties, discloses to their Manager that they may have a drug reading or blood alcohol level in excess of the permissible limits, that team member/contractor shall be permitted to return home (via safe means) and return to work once they have a clearance from a medical practitioner. The team member shall be entitled to access accrued entitlements during this period. NB: Contractors are subject to their employer processes regarding their entitlements.

Any team member/contractor who voluntarily notifies Metcash that they have a drug or alcohol dependency condition, will be encouraged to seek advice and receive appropriate treatment. Metcash will undertake to support the team member throughout this process and treat the matter with confidentiality and sensitivity. A team member's security of employment will not be jeopardised provided that:

- The team member agrees to participate in an approved rehabilitation program;
- The team member progresses satisfactorily in the approved rehabilitation program; and
- The team member does not return a non-negative result on further testing.

Team members are also encouraged to seek professional counselling assistance through the Employee Assistance Program (EAP). Participation in this program is free and confidential and information disclosed by team members will not be disclosed without their consent.

NB: For Contractors, a Metcash representative should notify the contractor's employer confidentially to be addressed according to their processes.

## 4. Responsibilities

| Role                         | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| GLT and General Managers     | <ul style="list-style-type: none"> <li>Responsible for implementing this protocol and ensuring compliance with it.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Team Members and Contractors | <ul style="list-style-type: none"> <li>Responsible for ensuring that they attend their workplace in a fit state and able to safely undertake their duties.</li> <li>Must not attend for work with the presence of illegal drugs in their system</li> <li>Must not attend for work with a drug or blood alcohol level in excess of the permissible limits.</li> <li>Must not consume alcohol at work, except as provided for in this protocol</li> <li>If taking medications which could cause drowsiness, adverse side effects, or impair a person's judgement or reactions, must notify their supervisor and not commence work until authorised to do so (which may require clearance from their treating doctor)</li> <li>Must participate in random, for cause and post incident testing as directed</li> </ul> |
| Site Managers                | <ul style="list-style-type: none"> <li>Establish and maintain a contract of service with an accredited workplace drug and alcohol testing company for the provision of random and confirmation drug and alcohol tests.</li> <li>Establish and maintain that only Accredited Testers undertake random/causal/post incident testing.</li> <li>Provision of accredited training for Metcash team members who are nominated as an onsite tester.</li> <li>Provide and maintain appropriate equipment for testing of drugs and alcohol at site where applicable.</li> <li>Oversee that this protocol is communicated and implemented.</li> </ul>                                                                                                                                                                        |
| Managers/Supervisors         | <ul style="list-style-type: none"> <li>Managers and Supervisors who have responsibility for supervising any team members and/or contractors are required to comply with all aspects of this protocol.</li> <li>Report and investigate any team member that they reasonably suspect has attended for work with a drug or blood alcohol level in excess of the permissible limits including because of observation of deteriorating work performance, abnormal conduct or behaviour.</li> </ul>                                                                                                                                                                                                                                                                                                                      |
| People and Culture           | <ul style="list-style-type: none"> <li>Guiding and assisting local managers in the application of disciplinary action and the execution of this protocol.</li> <li>Support local managers and the SHE Team in the implementation and execution of this protocol.</li> <li>Ensuring that Team members are aware of the Employee Assistance Program.</li> <li>Maintaining all related non-negative drug and alcohol tests, case notes and file notes as required by this protocol and relevant legislation.</li> </ul>                                                                                                                                                                                                                                                                                               |
| National SHE Team            | <ul style="list-style-type: none"> <li>Provide assistance and advice on drugs and alcohol in the workplace.</li> <li>Provide guidance in relation to this protocol and Australian and New Zealand Standard requirements.</li> <li>Assist in the investigation of incidents involving this protocol.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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| Metcash Accredited Tester (where applicable) | <ul style="list-style-type: none"> <li>Comply with the terms of the relevant service level agreement established between Metcash and the provider.</li> <li>Comply with the relevant AS/NZS for drug and alcohol testing</li> </ul> |
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## 5. Definitions

|                                           |                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Accredited Laboratory</b>              | A laboratory that holds NATA accreditation for the quantitation of drugs in oral fluid                                                                                                                                                                                                                                                                                     |
| <b>Accredited agency</b>                  | <p>A service provider accredited by NATA and conducting testing in accordance with</p> <ul style="list-style-type: none"> <li>AS/NZS 4760: Procedures for specimen collection and the detection and quantitation of drugs in oral fluid</li> <li>AS/NZS 4308: Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.</li> </ul> |
| <b>Alcohol</b>                            | the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols in methyl and isopropyl alcohol, no matter how it is packaged or in what form the alcohol is stored, utilised or found.                                                                                                                                                   |
| <b>Approved Function</b>                  | A function that has been approved by a relevant Metcash Group senior manager. At minimum the senior manager is at a level that heads a functional department or is above a site level e.g. General Manager, Regional Manager, Functional Department Manager.                                                                                                               |
| <b>BAC</b>                                | Blood Alcohol Content level.                                                                                                                                                                                                                                                                                                                                               |
| <b>Confirmed Positive</b>                 | Confirmatory testing undertaken by an accredited agency that shows the presence of drugs/alcohol in the sample of biological fluid submitted for testing.                                                                                                                                                                                                                  |
| <b>Contractor:</b>                        | A person or group engaged by Metcash to provide work, goods or services. e.g. independent contractors, subcontractors, an employee of a labour-hire agency, transport carriers, maintenance tradespersons and other service personnel.                                                                                                                                     |
| <b>Drug(s)</b>                            | Any Prohibited Drug(s) or any controlled substance which has the potential to affect a person's ability to perform their duties safely but does not include medication which has been prescribed for a Team member or Contractor by a medical practitioner provided there has been compliance with the requirements of this Protocol.                                      |
| <b>EAP or Employee Assistance Program</b> | A program incorporating established procedures for the referral to specialist counselling service of team members. An EAP is provided via an independent organisation to ensure confidentiality. The program is strictly voluntary.                                                                                                                                        |
| <b>For Cause/Challenge testing</b>        | Testing where a reasonable suspicion exists that a team member/contractor has attended for work with a drug or blood alcohol level in excess of the permissible limits.                                                                                                                                                                                                    |
| <b>Impairment</b>                         | The state of being diminished, weakened, or damaged in judgement, concentration or co-ordination.                                                                                                                                                                                                                                                                          |
| <b>Non-negative test</b>                  | An onsite preliminary non-negative result that has not yet been confirmed by an Accredited Laboratory.                                                                                                                                                                                                                                                                     |
| <b>Random testing</b>                     | Team members/contractors tested for drugs and alcohol on random and unannounced schedules. Testing could entail selecting a proportion of team members/contractors to be tested or testing all team members/contractors in a single event.                                                                                                                                 |
| <b>Blanket Testing</b>                    | Team members/contractors tested for drugs and alcohol on random and unannounced schedules. where testing occurs for all team members/contractors in a single event.                                                                                                                                                                                                        |
| <b>Substance</b>                          | Alcohol, Drugs or any other substance which, in the reasonable opinion of the Company could impair a person's ability to safely and effectively perform their function(s).                                                                                                                                                                                                 |
| <b>Team Members:</b>                      | Includes all employees and all levels of management full-time and casual, employed by Metcash. This includes team members employed directly by the Metcash on a fixed term contract.                                                                                                                                                                                       |
| <b>Unlawful Substances</b>                | Illegal drugs or substances which are prohibited by law to be made, bought, sold, transferred, used or possessed.                                                                                                                                                                                                                                                          |

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| <b>Working Hours</b> | The time between the commencement of work activities and the conclusion of work activities on behalf of the Company on any one working day. Normal working hours shall include lunch or other meal breaks and Company business conducted away from the Company's usual workplaces. |
| <b>Workplace</b>     | The place of work that a team member/contractor attends and can include Tool of Trade vehicles and customer's premises.                                                                                                                                                            |

## 6. Supporting Documents

- SHE-GC: Fit for Work Policy
- SHE-GS: Fitness for Work Standard
- Ausroads Drivers' Legal BAC limits <https://austroads.com.au/publications/assessing-fitness-to-drive/ap-g56/drivers-legal-bac-limits>
- AS 3547: Breath alcohol testing devices for personal use
- AS/NZS 4308: Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine.
- AS/NZS 4760: Procedures for specimen collection and the detection and quantitation of drugs in oral fluid.

## 7. Revision History

| <b>Modification:</b>                                                                                                                       | <b>Author:</b> | <b>Approver:</b> | <b>Date Approved:</b> |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------|-----------------------|
| Continuous improvement, supersedes SWSP 3.25 Fit for Work                                                                                  | Meg Tecson     | Ed Napiorkowski  | 12 March 2020         |
| Updated references of being under the influence of drugs and alcohol to drug and blood alcohol levels in excess of the permissible limits. | Sonia Correa   | Ed Napiorkowski  | 16 February 2021      |

## 8. Appendix: Drug & Alcohol Testing Flowchart

