DRUG AND ALCOHOL POLICY

1.0. PURPOSE

This policy outlines the expectations and obligations applicable to all employees. The purpose of this policy is to ensure that all Glad Group employees can perform their work in a safe and healthy work environment. It includes the process that Glad Group will complete following raised concerns that drugs or alcohol are used or handled within the workplace or in the course of employment. It also outlines the actions Glad Group may take and the consequences for a positive drug or alcohol test result.

2.0. SCOPE

The drug and alcohol policy applies to all Glad Group entities as outlined below:

- **Glad Group Pty Ltd** | ABN 62 092 928 115
- **Glad Cleaning Service Pty Ltd** | ABN 43 054 617 891
- Glad Security Pty Ltd trading as **Glad Group Services** | ABN 99 122 097 590
- **Glad Maintenance Pty Ltd** | ABN 85 127 522 481
- **Glad Indigenous Pty Ltd** | 13 648 519 957
- **Auxus Pty Ltd** | 12 655 147 292
- Stratium Global Pty Ltd trading as **Unifyd Technology** | 55 627 094 366
- **Glad Group NZ Limited |** NZBN 9429 047 106 437
- **Australian Protective Services Pty Ltd 47 610 471 424**

It applies to all employees regardless of their job title, responsibilities, seniority, or location, within every subsidiary or joint venture that Glad Group has control over.

For the purpose of this policy, employees include Glad Group's contractors and sub-contractors.

The drug and alcohol policy draws on legislation, regulations, policies and procedures, employment contracts and best practice.

3.0. POLICY STATEMENT

Using drugs or alcohol can lead to employee impairment while at work. Poor concentration, carelessness, risk-taking behaviour, and errors in judgement are real risks. Alcohol and drug use affects work performance and productivity and might also result in higher rates of injuries, incidents and absenteeism.

A person whose work performance or behaviour is or is considered likely to be impaired by drugs or alcohol, including over the counter and prescription medication, will be considered to pose an unacceptable risk to the health and safety of themselves and others. A person that is or is suspected to be under the influence or impaired will not be allowed to remain at work.

Employees that are working at customer sites or attending customer sites for any reason, must also adhere to any drug and alcohol policies and programs of those customers. When these policies and programs have lower or zero tolerance drug and alcohol limits, those limits apply.

Glad Group is committed to maintaining a Speak Up culture by promoting open and trusting dialogue with employees at all levels. All employees play a role in ensuring that our workplaces

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are safe. This means, if you witness someone that is or may be under the influence or impaired then you have a responsibility to act. Your responsibilities are detailed further in section 3.5.

3.1. Over the Counter and Prescription Medication

Employees who take over the counter or prescribed medication must ensure that they are aware of any potential impact these may have on their work performance or impact on the health and safety of themselves and others within their workplace. Employees are encouraged to consult with their treating doctor. Any potential impact on work performance or the health and safety of the employee or others within the workplace must be disclosed without delay to the employees' manager.

The manager together with the employee will review the employees' duties and where necessary make reasonable adjustment within the workplace. Should there be a requirement for long-term or permanent modifications the manager must contact People and Culture for further review and consultation. The manager must not make a decision around long-term or permanent modifications to an employee's duties without consultation with People and Culture.

3.2. Alcohol

Glad Group's limit for alcohol is generally less than 0.05 BAC unless stated or instructed otherwise. For employees that drive a vehicle or operate machinery in the course of their employment the limit is 0.00 BAC.

For employees working on customer sites or attending sites for any reason, the applicable drug and alcohol policies and programs of the customer will apply. Where the customer limits are different than Glad Group's, the lower of the two policies is applicable.

Glad Work Functions

Where alcohol is served at a Glad Group function, the person or department responsible for the function must ensure that appropriate measures are put in place to encourage responsible drinking and safe driving practices. This is done by, (but not limited to):

- outlining set expectations to attendees before the work function
- the responsible service of alcohol
- offering non-alcoholic beverages
- serving food
- encouraging employees to use alternative transport

The best way to ensure your safety and that of others is if you are planning to drink at all – do not drive.

Glad Endorsed Functions

If an employee attends a Glad endorsed function that will be serving alcohol, such as a customer event or a team lunch, the expectation is that the employee is consuming alcohol responsibly, mixing it up with non-alcoholic beverages and consumption of food.

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If the expectation is that the employee will return to work at a customer site following the function, Glad Groups limit apply or in the case where the customer's limit is lower, that limit will apply.

The best way to ensure your safety and that of others is if you are planning to drink at all – do not drive.

On Call Obligations

When employees are rostered to be on-call and any call back duties include any duties that cannot be performed from a home environment, it is a requirement that they return to work with less than 0.05 BAC or if operating a vehicle or machinery 0.00 BAC.

3.3. Drugs

The consumption of, being under the influence or being in the possession of illicit drugs or drug paraphernalia whilst at work or during the course of employment is never allowed, and this includes during breaks whether paid or unpaid.

3.1. Reasonable Suspicion

Employees that are suspected to be under the influence or impaired by drugs or alcohol will be sent home on normal pay for the remainder of that day. The employee may be required to take accrued leave or unpaid leave in any subsequent period of absence for example pending a test result.

Managers know their staff and are familiar with their usual behaviour and therefore, the immediate manager or other available Glad Group manager, including a manager of our customers, will make the decision on an employees' impairment.

An immediate test is not required when a manager has reasonable suspicion and is requesting an employee to leave the workplace.

3.2. Testing

Glad Group reserves the right to conduct drug and alcohol testing on employees. A direction to complete a drug and alcohol test may come from Glad Group, its customers or via a third party on behalf of Glad Group or the customer. The testing can be random or targeted.

A test may be required following, (but not limited to):

- an accident during the course of work which results in an injury or illness
- an incident that occurs during the course of work that results in plant or vehicle damage
- an incident that occurs during the course of work that results in property or environmental damage
- an incident or near miss that has the potential for risk of harm or injury to persons, plants, vehicles, property or environment
- a reasonable suspicion of impairment due to the suspected consumption or use of drugs or alcohol

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- a reasonable suspicion of usage or any other handling of illicit drugs within the workplace or during the course of employment
- a request from Glad Group's customer

Testing can be undertaken by an authorised staff member of Glad Group, the customer or by an independent testing provider.

Random Testing

Random testing for drugs and alcohol may be conducted at any time without prior notice throughout the employees' hours of work, including overtime. It usually involves testing a randomly selected group of employees within an identified period. If the testing is taking place onsite, the testing will be conducted in an appropriate area, and it will be done privately with only the person undertaking the test present.

Targeted Testing

Where there is a reasonable suspicion of drug or alcohol use or impairment within the workplace or in the course of employment, or for any other targeted reason for example post incident, the employee may be required to undergo a drug and alcohol test. This test can be completed onsite or at a provider's testing facility. It is at the discretion of Glad Group to determine where the test will be completed and by whom. Such testing may have to be completed outside the working hours of the employee.

Testing Methods

Testing of drugs and alcohol can be in form of a breathalyser, saliva, urine, or blood sample. When engaging an external testing provider, Glad Group will endeavour to utilise a testing provider that is accredited to the standards AS/NZS4308 for urine and AS/NZS4760 for oral fluid.

Test Results

There are different test outcomes and based on the result, appropriate actions will be taken.

Negative

No drugs or alcohol are detected in the sample.

Positive

Alcohol

When blood alcohol concentration is recorded over 0.00 BAC.

Drugs

A positive drug result can only come from a report provided by a test provider or laboratory. The test must have a reading less than the cut off level stipulated in AS/NZS4308 for urine and AS/NZS4760 for oral fluid.

Non-Negative

A non-negative result can occur in an instant test when a drug metabolite is detected. This does not confirm that drugs are definitely detected.

3.3. Actions

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Pending Test Result

Glad Group may have to temporarily suspend or transfer an employee involved in an ongoing investigation and/or pending test results. This might be necessary to ensure the health and safety of the employee and others, or to ensure that service delivery to our customer is not disrupted.

Negative Test

If an employee's initial test is completed within a reasonable timeframe and is negative, the employee can return to work and generally there are no further actions required.

If the test was conducted as part of another investigation, the immediate return to work may not be appropriate and may be subject to the outcome of that investigation.

Positive Test

Alcohol

If an employee's initial alcohol test is above 0.00 BAC, a second test must be performed within 20 minutes.

- If the second test is over Glad Group's limit, the employee must be sent home and not return until the next rostered shift or as advised by the manager.
- If the second test is under Glad Group's limit the employee can return to work unless the requirements and obligations under a customer's drug and alcohol policy is contrary to this.

Drugs

If an employee's initial drug test is positive a second test may be required to be performed within 12 hours or as soon as possible following the initial test if the 12 hour timeframe cannot be met. If the initial test was deliberately delayed, then a second test may not be required and the positive result from the initial test will be relevant. It is at the discretion of Glad Group to determine whether a second test is required.

A positive drug or alcohol test does not automatically mean that an employee is impaired, or performance is affected. However, a positive test will be taken into consideration to determine if there are grounds that the employee is guilty of misconduct.

Following the completion of test/s the following may occur, (but is not limited to):

- employee returning to work
- offering of employee assistance program
- taking disciplinary action against the employee. This may include permanent removal from site or termination of employment

Non-Negative Test

In the case of a non-negative test Glad Group will comply with the Australian or New Zealand Standard that requires that a non-negative drug test must be sent for confirmation testing within an accredited laboratory to confirm the presence of drugs.

The confirmatory testing can determine drug concentration levels and if the result may be consistent with medications, foodstuffs, or illicit drug use.

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The initial urine instant test sample can usually be split and sent for testing. Saliva testing requires a second saliva sample to be sent to the laboratory. The second sample will be collected immediately after the instant test result is available.

The confirmatory testing it will be deemed as either negative or positive and actions considered thereafter.

Refusal or Delay

Glad Group takes any refusal or deliberate delay to undertake a test very seriously. A refusal or deliberate delay to undertake a test will be managed in the same way as a positive test result. Any periods of refusal or deliberate delays and where the employee is not working due to a pending test result may be treated as unpaid absence. Employees who fail to comply with a request for a drug or alcohol test may be subject to disciplinary action including termination of employment.

Test Tampering

Glad Group takes deliberate tampering with tests very seriously, for example diluted urine tests. If continuous urine tests, in the absence of prescribed diuretic use or pre-recorded medical conditions, are too diluted for testing, the test will be managed the same way as a positive test result. Employees who are under the suspicion of tampering with a test may be subject to disciplinary action including termination of employment.

3.4. Voluntary Disclosure

Employees who voluntarily informs Glad Group that they are having problems with alcohol or drugs that may affect their work and provides sufficient documentation from a medical practitioner may be entitled to take accrued leave while attending treatment.

3.5. Preventing Drugs and Alcohol within the Workplace

Glad Group aims to prevent drugs and alcohol within the workplace by monitoring our workplace culture and regularly reviewing our policies and procedures. This includes, but is not limited to:

- conducting testing
- providing internal and external training
- conducting exit interviews
- gathering feedback via employee surveys
- reviewing and investigating feedback from customers and suppliers
- conducting internal and external site audits
- conducting risk assessments
- providing reporting alternatives to employees

All employees play a role in ensuring that our workplaces are free from drugs and alcohol. This means, if you witness suspected drug and alcohol usage or handling by another employee of Glad Group within the workplace or in the course of employment then you have a responsibility to act. Remember that the behaviour that we accept is the behaviour that we condone. If you see

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suspected drug or alcohol usage or handling by a Glad Group employee within your workplace or in the course of your employment, you must report the behaviour to someone who can act on it. This would typically be your direct manager, but in some instances, it may be People and Culture or the Whistleblower Service.

3.6. Support

Where an employee is under investigation of suspected drug and alcohol usage or handling within the workplace or in the course of employment, Glad Group provides support throughout the investigation process. The support includes:

- ensuring everyone involved understands the process and timeframes
- providing access to external counselling with the employee assistance program
- providing language support as required
- ensuring that we allow and encourage a support person

3.7. Employee Rights

Drug and alcohol testing may infringe an employee's rights which will make the testing less reasonable:

- an employee's right to privacy under applicable Privacy Acts and Glad Group's internal privacy policy may need to be considered, specifically when considering sample collection procedures, the method of analysis and the handling of tests results.
- an employee's rights under applicable Human Rights Acts and Glad Group's internal Human Rights policy may be considered.

3.8. Grievance Procedure

Glad Group promotes a Speak Up culture and encourages all employees to raise any concerns. This can be done in accordance with the grievance resolution policy, by contacting People and Culture or the Whistleblower Service.

- gladacademy@gladgroup.com.au
- https://www.whistleblowingservice.com.au/gladgroup/

Employees that raise concerns of alleged drug and alcohol usage or handling within the workplace and the complaint is found to be malicious, frivolous, or vexatious may be subject to disciplinary action up to and including termination.

3.9. Employee Assistance Program

All employees and their immediate family members have access to Glad Group's EAP (Employee Assistance Program) service. This is a confidential wellbeing, coaching and support service provided at no cost to employees and their immediate family. They can be contacted via:

- Phone (AU): 1800 808 374

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- Phone (NZ): 0800 808 374
- Website: assureprograms.com.au/appointment
- Chat: Download the Wellbeing Gateway Application and use Company Code: GLA2254

4.0. LOG OF CHANGES

DATE	AMENDMENTS	AUTHORISED BY	REVISION
August 2017	Initial Policy	Human Resources	1
May 2019	Revised Policy	People and Culture	2
May 2023	General updates	Ann Shanahan	3

5.0. RELATED POLICIES AND PROCEDURES

- Glad Group code of conduct
- grievance resolution policy
- privacy policy
- IBMS Manual

6.0. CONTACT FOR QUESTIONS

Please contact People and Culture if there are any questions regarding this policy.

Authorised by:



Kiri Chase
Head of People and Culture

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