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Policy

ALCOHOL AND OTHER DRUGS (AOD) POLICY

DOCUMENT PURPOSE

The purpose of the Alcohol & Other Drugs is to provide a central resource for Adaptalift Group employees to ensure a national standard is established.

DOCUMENT CONTROL

This document is regularly updated to reflect current work practices. Please refer to the online copy of this document on the Adaptalift Group intranet site to ensure you are reviewing the current document. Any offline or printed copies are considered as uncontrolled and potentially out of date.

Release Date	Version	Reason for Amendment
23/05/2016	1	Creation
23/05/2017	2	Review
19/07/2022	3	DRAFT Major Rework
30/8/2022	4	Major Rework Release
23/11/2022	5	Removal of airport requirements
19/09/2023	6	Extension of scope to SST & PMH.
13/11/2025	7	Inclusion on medicinal marijuana. Additional detail post first non-negative, additional detail refusal to participate, additional details on company events/functions.

PROCEDURAL CHANGES

In order to maintain our best practice approach, any feedback or suggestions for the improvement of any company policies and procedures is welcomed.

To request a change to a form, report or procedure, complete the FM1001 Request for Procedure or Document Change form and forward to the Business Manager for approval.

All changes will be communicated as they occur.

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1 DEFINITIONS

Term	Description
Adaptalift	Adaptalift Corporation, Adaptalift Group, Adaptalift Truck Rentals, APS, Speedshield Technologies, Pacific Materials Handling, and any other entity incorporated under the Adaptalift banner.
AOD	Alcohol and other drugs
Authorised 3rd Party Testing Agency	An accredited commercial entity that provides alcohol and drug testing services.
BrAC	Breath Alcohol Concentration
Contractors	Third Party Services engaged by Adaptalift or Adaptalift customers working on Adaptalift work sites
Non-negative	A test result that has indicated the possible presence of drugs but is yet to be confirmed positive by laboratory testing
Employees	Employees of Adaptalift Contractors engaged by Adaptalift Subcontractors engaged by contractors of Adaptalift Contractors engaged by 3rd Parties to perform work at an Adaptalift work site Employees employed by those contractors and subcontractors Volunteers of Adaptalift Apprentices and work experience students
Responsible Manager	A senior positioned manager appointed by Adaptalift Management to oversee coordination of an AOD Testing Program
Work Site	Any Adaptalift facility or any location where Adaptalift employees attend or conduct works.

2 POLICY

2.1 AOD POLICY

Adaptalift has a longstanding commitment to providing a safe, quality-oriented and productive work environment consistent with the standards of the community in which we operate. Alcohol and/or other drug use and misuse pose a threat to the health and safety of Adaptalift employees, contractors, visitors and to the security of our equipment and facilities.

For these reasons, Adaptalift is committed to the reduction and elimination of alcohol and/or other drugs use and misuse in the workplace.

Adaptalift requires all employees present at Adaptalift work sites, including sites where any employees are attending as a representative of Adaptalift, fit for duty and free of any adverse effects of alcohol and/or other drugs.

All employees are responsible for informing their immediate Manager, Supervisor or Coordinator if they believe they are unfit for work and must not commence work. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors about their medications' effect on their fitness for work, their ability to work safely, and they must promptly disclose any work restrictions to their supervisor.

Employees who are not fit for work, as a result of being under the influence of alcohol and/or other drugs above the prescribed levels described in this policy, will be subject to disciplinary action in accordance with this policy, which may include termination or in the case of contractors, breach of contract and/or suspension / cancellation of service. Confidentiality is fundamental when dealing with issues in the workplace related to fitness for work, particularly the use of alcohol and other drugs above the prescribed levels described in this policy. To protect the privacy of employees and to encourage employee acceptance of prevention and treatment measures, all related matters will be handled with the utmost confidentiality and sensitivity. Failure to comply with confidentiality requirements is considered serious misconduct and will be subject to disciplinary action and/or dismissal in accordance with the Ending Employment Policy. Many areas of operations are also subject to further legislative requirements to ensure fitness for work.

2.2 SCOPE

This policy applies to all employees and prospective employees of Adaptalift including permanent full time, part-time and casual employees.

This policy applies whilst on any Adaptalift work site, or any other site as a representative of Adaptalift, at all Adaptalift functions, and while travelling on behalf of Adaptalift.

Where any employees attend an external work site as a representative of Adaptalift and those site rules are more stringent than this policy, those site rules will apply. Where there are no rules in relation to fitness for work, or they are not set as a minimum standard in line with this policy, then the Adaptalift policy will prevail and apply.

Adaptalift will ensure that all employees engaged by the company are made aware of this policy.

2.3 ACCOUNTABILITIES

2.3.1 Chief Executive Officer

The Chief Executive Officer is accountable for the effective implementation and operation of this AOD policy and program. This includes the provision of training, education and other support programs and periodic review of the implementation, application, and effectiveness of the policy.

2.3.2 General Managers

General Managers are responsible for:

- Assessing the 'fitness for work' of employees within their area of responsibility.
- Acting in accordance with this policy if they notice any other employees or visitors who appear unfit while on site.
- Taking prompt and appropriate action to address declining safety or work performance because of alcohol and/or other drug use above the prescribed levels described in this policy, in the same manner as for any other cause.
- Consulting with a suspected 'fitness for work' breach with the employee's direct Manager and a Human Resources representative, or in the case of contractors, with the contracted company's management to determine the 'fitness for work' status. Where possible, this should be verified or supported by a medical practitioner.
- Ensuring all Managers, Supervisors and Coordinators in their area of responsibility are appropriately trained in this policy to ensure their competency in handling these matters.

2.3.3 Managers, Supervisors, and Coordinators

Managers, Supervisors and Coordinators are accountable for:

- Ensuring that employees in their area of responsibility are aware of and comply with this policy.
- Applying the policy fairly and consistently to everybody.
- Assessing the 'fitness for work' of employees in their area of responsibility and taking prompt and appropriate action to address declining safety or work performance because of alcohol and/or other drug use above the prescribed levels described in this policy, in the same manner as for any other cause.
- Acting in accordance with this policy if they notice any other employees or visitors who appear unfit while on site.

2.3.4 All Employees

All employees are accountable for:

- Ensuring they do not perform their job, remain at work, or undertake any related activity if they are impaired by effects of alcohol and/or other drugs above the prescribed levels described in this policy.
- Raising any concerns about their own AOD use or misuse.
- Raising any concerns about another employee's AOD use or misuse.
- Notifying their Manager, Supervisor or Coordinator of any situation where they believe an employee is impaired by effects of alcohol and/or other drugs above the prescribed levels described in this policy.
- Notifying their Manager, Supervisor or Coordinator of any situation in which this policy may have been breached. This includes:
 - The unauthorised consumption of alcohol and/or other drugs on site or during work.
 - The failure to notify Supervisors or Managers of the consumption of prescription or over the counter medication which may hinder the ability to perform duties in a safe and adequate manner, and as such the employee's fitness for work.
- Participating in random alcohol and/or other drug tests conducted whilst on any Adaptalift site, or any other site as a representative of Adaptalift, at all company functions, and while travelling on behalf of the Adaptalift.
- Notifying the Responsible Manager immediately if they are required to leave site on a day of testing and ensure they are tested prior to leaving site.

2.4 SERIOUS MISCONDUCT

The following behaviours shall be deemed serious misconduct and will be subject to disciplinary action and/ or instant dismissal:

- The manufacturer, possession, consumption, sale or supply of illicit drugs
- The unauthorised consumption, sale or supply of alcohol
- Breaches of confidentiality
- Tampering with an alcohol and other drug test sample
- Refusal to participate in testing

Adaptalift reserves the right in exceptional circumstances to terminate the services of an employee without following this policy in the case of exceptional or gross breach or disregard of this policy.

2.5 PRESENCE OF ALCOHOL AND/OR OTHER DRUGS

The use of alcohol and/or other drugs above the prescribed levels described in this policy, can affect an employee's efficiency, and judgement. This can expose an employee or others to risks and/or injury and may cause property damage and/or loss.

Adaptalift will not tolerate employees who attend work or return to work affected by alcohol, illicit drugs or undisclosed over the counter or prescription drugs above the prescribed levels described in this policy.

Adaptalift requires all employees to comply with the below limits.

2.5.1 Alcohol

The maximum acceptable level of BrAC while at work is 0.00%.

Employees consuming or impaired by alcohol on company premises, without the prior approval of a General Manager, will be subject to disciplinary procedures. If an employee is not fit to drive, transport to ensure safe travel to his/her place of residence will be made available.

Employees who consume alcohol (including drinks at a workplace, function, lunch or meeting) must not return to work if they have a BrAC reading of greater than 0.00%. Where an employee has a BrAC of greater than 0.05%, they are legally not allowed to drive, and must arrange their safe transport home. If an employee is not fit to drive, transport to ensure safe travel to his/her place of residence will be made available. Any employee who drives a company vehicle with a BrAC level in excess of 0.05% is breaking the law and may be subject to disciplinary action.

Employees on a call out roster must maintain a BrAC of 0.00%.

Any employees on a call out roster that fail to maintain a BrAC of 0.00% while on call may be subject to disciplinary action.

The supply of alcohol to, or consumption of alcohol by persons under 18 years of age is an offence under the law. No employee under the age of 18 shall be supplied with, or consume alcohol provided by the company or social club at any time.

2.5.2 Drugs – Illicit and Prescription

The company follows the Australian Standard/New Zealand Standards (AS/ NZS) 4308 (Urine) and 4760 (Oral) for test cut-off levels.

Where legislation or other sites (where an employee is attending as an Adaptalift representative) has more specific rules that apply than what is prescribed within this policy for types of work, the applicable legislation and/or site rules will take precedence over the maximum acceptable level set out in this policy.

Any employees found in possession of, or consuming drugs (other than for prescribed medical purposes with supported documentation) of any description in the workplace (including company related travel) or at any company function may be subject to instant dismissal or termination of contract.

Some prescription and over-the-counter drugs can affect performance and interfere with drug testing. The following substances may result in a confirmed positive drug test: cold and flu medications (Codral, Demazin, Duro-tuss etc) hypnotics, sedatives, anti-depressants, antihistamines, stimulants, appetite suppressants and analgesics / codeine (Nurofen Plus, Panadeine Forte).

If any employees are required to operate vehicles or machinery and are taking prescribed or over the counter medication that carries a warning regarding the operation of vehicles or machinery, they must notify their Manager, Supervisor or Coordinator.

Any employees using prescribed medication or over the counter medication should ask their doctor or pharmacist what effects the medication may have on them and obtain a medical clearance from their doctor or pharmacist prior to commencing work.

2.5.3 Additional Clause: Medicinal Cannabis (THC / CBD)

General Position

The Company acknowledges that medicinal cannabis products may be lawfully prescribed in

Australia and New Zealand. However, because of the nature of our operations - which involve driving, mobile plant, and other high-risk activities - the Company does not permit the use of any medication or substance that could impair performance, judgment, or reaction time.

THC (Tetrahydrocannabinol) — Not Permitted

The use of THC-containing medicinal cannabis is not authorised under this policy, even where prescribed by a medical practitioner.

This applies to all roles across the Company, not only those involving driving or vehicle operation, due to the significant safety risks of working around mobile plant, powered equipment, and other potentially hazardous environments.

In both Australia and New Zealand, it remains illegal to drive with any detectable amount of THC in one's system, regardless of whether the THC is prescribed.

- In Australia, all states and territories have “presence-based” drug-driving laws, making it an offence to drive with THC detected in oral fluid or blood.
- In New Zealand, under the Land Transport (Drug Driving) Amendment Act 2022, THC is also a controlled substance under drug-driving laws, and a positive test may result in penalties even if prescribed.

Because THC can remain detectable in the body for an extended period and may impair coordination or concentration, its use presents an unacceptable safety risk in our operating environment.

CBD (Cannabidiol, THC-Free) — Permitted with Conditions

CBD-only medications (with no THC content) may be accepted as authorised prescription drugs, provided the employee:

- Supplies supporting medical documentation;
- Confirms that the product contains no detectable THC; and
- Obtains medical clearance confirming it will not cause impairment or affect their ability to perform work safely.

Employees must ensure any CBD products used are verified as THC-free, as some formulations may contain trace amounts.

Disclosure and Clearance

- Employees prescribed medicinal cannabis, or any similar product must disclose this to their Manager or Supervisor before commencing work.
- The Company may request medical documentation confirming the product composition and clearance that the medication will not impair the employee's ability to work safely.
- Employees who fail to disclose such information and subsequently return a positive test may be subject to disciplinary action.

Ongoing Review

The Company will continue to monitor the legal and medical frameworks surrounding the use of medically prescribed THC and CBD. This position may be reviewed in the future based on updated legislation, medical guidance, or validated impairment testing technologies.

3 TESTING PROGRAM

It is a condition of employment that all employees undertake an alcohol and/or other drug test when requested.

The following types of testing will be used:

- Random testing
- Blanket testing
- Post positive testing / return to work / target testing
- Post incident / for cause testing
- Testing if suspected of consuming alcohol and/or other drugs
- Pre-placement medical alcohol and other drug testing

3.1 RANDOM/ BLANKET TESTING

A random/blanket alcohol and/or other drug testing program will apply to all employees on Adaptalift work sites.

Note: Any employee who attends an Adaptalift work site or related site on a day of testing will be deemed as demonstrating intent to work and therefore will be subject to testing.

Pre-determined groups of employees will be tested at various times throughout the year. On a scheduled testing day one or more groups will be tested.

Field based and work from home employees, including Technicians and Sales, will be notified to present to either an Adaptalift work site for testing or to an Authorised 3rd Party Testing Agency on the day of notification.

The test process is provided by an Authorised 3rd Party Testing Agency.

To ensure that this process is fair and objective, the Head of Human Resources in consultation with the provider will schedule the testing days and conduct this process. Employees will not be notified of the schedule of alcohol and/or other drug testing prior to the day. The Head of Human Resources or an appropriate alternative company contact will confirm the testing date and time with the Authorised 3rd Party Testing Agency approximately one week prior to the scheduled date.

The Authorised 3rd Party Testing Agency provider will conduct alcohol and/or other drug tests on all selected employees present from the designated group.

Attempts by any employee to refuse testing or leave the site without authorisation or permission from the Responsible Manager will be considered a positive test result and will be managed in accordance with this policy.

If an employee is required to leave site, they will be treated as a priority and must be tested prior to leaving site. No employee will be entitled to leave site unless there are mitigating circumstances and the Responsible Manager authorises their absence.

Testing will be conducted in a private area and be performed as per AS/NZS 4308 or AS/NZS 4760. The drug test will be conducted with either an oral fluid or urine test. The alcohol test will be conducted with a breathalyser.

Where an employee is requested to undertake a drug test, they are encouraged to disclose any medication (e.g. cold and flu medication, pain killers etc) which they are taking to the Authorised 3rd Party Testing Agency to avoid misinterpretation of results. It is in the employee's best interests to disclose any prescription, non-prescription or legal drugs as failure to do so may result in unnecessary disciplinary action. However, disclosure of medication is not required unless a 'non-negative' result is obtained.

The company reserves the right to amend and adjust the random system from time to time as appropriate. Employees will be notified in advance of all changes.

3.1.1 Responsible Managers Role During the Testing Process

The Responsible Manager in consultation with site Managers/Supervisors/Coordinators are required to:

- Assist with notifying all employees on site that random alcohol and drug testing has been organised and all employees (including contractors and employees from other sites present on the day) are required to submit for testing.
- Assist with notifying the pre-determined groups of employees who will be tested on a scheduled testing day.
- Ensure all pre-determined sales and/or field-service employees are tested promptly to avoid (as far as practicable) interruptions to their scheduled day.
- In addition to those listed above, ensure any employees who are required to leave site are tested first as a priority before leaving site.

Note: The Responsible Manager will not be tested because they would have prior knowledge of the testing date. The Responsible Manager will be tested separately at another time which is unknown to them.

If a 'non-negative' test result occurs during on-site testing, the Responsible Manager will adhere to the following process:

- The Authorised 3rd Party Testing Agency will contact the Responsible Manager to advise of the 'non-negative' or > 0.00% BrAC result.
- The Responsible Manager will enter discussions with the collection officer to understand the declared medication and type of 'non-negative' or > 0.00% BrAC result.
- Where a 'non-negative' result occurs relating to drugs, the Responsible Manager can contact a Technical Manager from the Authorised 3rd Party Testing Agency conducting the testing for further instructions regarding possible causes of non-negative on-site tests where it is not known.
- If there is no qualified reason for the 'non-negative', the Responsible Manager will advise the employee of the process and request that they leave site on full pay until a confirmatory test is received.
- The Responsible Manager is required to notify the Head of Human Resources or their delegate of a 'non-negative' result and to obtain further instructions (if necessary).

3.2 POST INCIDENT / FOR CAUSE TESTING

Employees involved in a serious incident may be required to undergo alcohol and/or other drug testing.

Serious incidents may include (but not limited to):

- Vehicle Accidents
- Injuries treated by a medical practitioner
- Property Damage
- High Potential Incidents
- Near Misses
- Fighting (Physical/Verbal)

A General Manager, Head of Human Resources or National WHSE Manager will determine if a post incident test is to take place.

3.2.1 Testing if Suspected of Consuming Drugs or Alcohol

If there is reason to believe that an employee is under the influence of alcohol and/or other drugs above the prescribed level described in this policy, the employee may be required to undergo an alcohol and/or other drug test. Requests for ad hoc alcohol and other drugs tests can only be approved by a General Manager, Head of Human Resources or Head of Operational Risk.

3.2.2 Pre-Placement Medical Alcohol and Other Drug Testing

The company conducts alcohol and other drug testing as part of a pre-placement medical examination. All prospective employees must undergo and pass an alcohol and/or other drugs test before a role can be confirmed.

4 RESPONSE TO TEST RESULTS

4.1 REFUSAL TO UNDERTAKE A TEST/ TAMPERING WITH A TEST/ SUBSTITUTION/ ADULTERATION AND DILUTED SPECIMENS

Refusal by an employee to submit to, or fully cooperate with, the administration of an alcohol and other drug (AOD) test will result in the Responsible Manager, General Manager, or Head of Human Resources being contacted to counsel and encourage the employee to undertake the test.

If the employee continues to refuse without a reasonable and extraordinary justification, such as a verified medical emergency or other circumstance beyond their control, the refusal will be treated as a failure to comply with company policy and managed as a presumed positive result under this procedure.

In cases where refusal is due to extraordinary circumstances, the employee must provide supporting evidence (e.g. medical certificate or other documentation) as soon as reasonably practicable. Each case will be reviewed by the Head of Human Resources to determine an appropriate course of action, including the option for standing the person down until evidence is provided.

Upon review by the Head of Human Resources, the employee will have 24 hours to complete a pathology alcohol and other drug test at Adaptalift's expense. The test must be conducted at an Adaptalift-approved pathology centre. Instant tests will not be accepted.

Where any non-negative result is detected, it must be sent for laboratory confirmation. If a non-negative result is confirmed positive, this will be considered a breach of this policy and will result in disciplinary action including potential termination of employment.

Following a confirmed positive test, in consultation with the employee, the Head of Human Resources (or their delegate) and the employee's direct manager will determine a suitable stand-down period (up to 6 weeks) to allow time for the drug(s) to clear from the employee's system. The employee can either use their accrued annual leave or unpaid leave during this period. Once this period has been completed, the employee will be notified of their retest date and must attend an approved pathology laboratory to complete an alcohol and drug test within 24 hours of the advised retest date. All second drug tests are to be conducted using urine samples. If the employee does not provide a test result within 24 hours, their employment may be terminated.

The Responsible Manager, Head of Human Resources, or their delegate will provide the employee with the contact details of Adaptalift's Employee Assistance Program (EAP) to arrange counselling and support. The employee must attend a minimum of one counselling session with the EAP before returning to work and provide a certificate of participation as evidence of attendance. Failure to complete this requirement as part of the return-to-work

process may result in further disciplinary action, up to and including termination of employment.

If the secondary test result is confirmed negative the employee can return to work.

If an employee refuses to undertake a test for the second time and has previously returned a positive result within the last 24 months, their employment may be terminated.

4.2 ALCOHOL TESTING

Where the employee has produced a BrAC reading of greater than 0.00%, the employee will be required to repeat a confirmatory test 20 minutes after the original test. The employee must not eat, drink or smoke anything during the waiting period. The employee will be fully supervised by the Responsible Manager or by another Manager as appointed by the Responsible Manager, during this time.

- If the second test produces a BrAC reading of 0.00% then the employee will be permitted to return to work.
- If the second test produces a BrAC reading of greater than 0.00%, the result will be positive, and the employee will be asked to leave the site. At this point, the employee should not drive. Transportation should be arranged to their home or alternatively the employee can arrange for someone to pick them up.

Upon return to work the following day the employee will be issued with a first and final written warning effective the day of the positive test result.

4.3 DRUG TESTING

4.3.1 Non-Negative

All tests MUST pass the sample check to be verified as a true negative sample. Refer DILUTED SPECIMEN (Urine Testing Only)

Where the employee has obtained a 'non-negative' result for drugs, the remainder of the original sample will be sent for a confirmatory test at an accredited laboratory. If the 'non-negative' result is for an illicit substance or a legal substance without documentation (inconsistent with medication declared on the day), the employee will be sent home on full pay for the remainder of their shift, and until a confirmatory test is received from the laboratory, this can take up to one week.

At this point, the employee should not drive. Transportation should be arranged to their home or alternatively the employee can arrange for someone to pick them up.

If the confirmatory drug test result is negative (does not breach the AS/NZS 4308 cut-off levels) the employee is able to return to work immediately with no further action required. All days away from the workplace will be paid by Adaptalift.

4.3.2 Confirmed Positive (Consistent with Declared Medication)

If a non-negative, consistent with declared medication, is recorded on site and the Authorised 3rd Party Testing Agency and Responsible Manager are satisfied with the explanation, the employee will be permitted to return to work.

If the confirmatory test is positive for a drug which was disclosed at the time of testing, the employee will continue to work without any further action required, provided they are able to safely perform their role.

4.3.3 Confirmed Positive for Illicit Substances

If the confirmatory drug test result is positive for an illicit substance or a legal substance without documentation (not consistent with the declared medication of the employee), the following process will occur:

- Once the confirmatory test is received from the accredited laboratory, the employee will be called by the Head of Human Resources (or their delegate) and the employee's direct manager to be advised of the result. In addition, they will be advised that a first and final written warning will be issued upon their return to work with the effective date being the day of the initial on-site test.
- In consultation with the employee, the Head of Human Resources (or their delegate) and the employee's direct manager will determine a suitable stand-down period (up to 6 weeks) to allow time for the drug(s) to clear from the employee's system. The employee can either use their accrued annual leave or unpaid leave during this period. Once this period has been completed, the employee will be notified of their retest date and must attend an approved pathology laboratory to complete an alcohol and drug test within 24 hours of the advised retest date. The employee is required to attend an Adaptalift-approved pathology clinic at Adaptalift's expense to complete a second alcohol and drug test. This test must be a laboratory pathology test - instant (on-site) test results will not be accepted. All secondary drug tests are to be conducted using urine samples.
- Where any non-negative result is detected, results must be sent for laboratory confirmation. If a non-negative result is confirmed positive, this will be considered a second breach of this policy and will result in further disciplinary action including potential termination of employment.
- If the result is confirmed negative the employee can return to work.
- The Responsible Manager, Head of Human Resources, or their delegate will provide the employee with the contact details of Adaptalift's Employee Assistance Program (EAP) to arrange counselling and support. The employee must attend a minimum of

one counselling session with the EAP before returning to work and provide a certificate of participation as evidence of attendance. Failure to complete this requirement as part of the return-to-work process may result in further disciplinary action, up to and including termination of employment.

- Time taken between the initial 'non-negative' result and the confirmatory positive result at the laboratory will be converted to either accrued annual leave or unpaid leave.

4.3.4 Diluted Specimen (Urine Testing Only)

If an employee returns a "diluted" specimen for the on-site test, they will be required to undergo a retest within a maximum of 2 hours. The employee will be required to be supervised by the Responsible Manager or another Manager/Supervisor as appointed by the Responsible Manager and is not permitted to consume any food, fluids or smoke during this period. If the employee provides a second specimen that:

- Passes the "sample check" it will be tested on site; and
 - if the specimen returns a 'non-negative' the process detailed in section 5.1.1 will apply.
 - if the specimen tests negative then the employee will return to work.

If the employee is unable to provide a specimen that passes the "sample check" within 2 hours they will be stood down on full pay and required to leave site. Note: These samples will NOT be tested on site. Both samples collected will be sent to a NATA accredited AS/NZS4308 laboratory to be examined.

The employee will be required to provide a specimen that passes the "sample check" within 24 hours from the time of the initial site test. This test must be completed by pathology. An instant test will not be accepted. The test will be at the employee's own cost.

If the employee is unable to provide a specimen that has passed the "sample check" within 24 hours, the result will be considered a presumed positive and they will be issued with a first and final written warning. The previous shift within the 24 hours will be processed as accrued annual leave or leave without pay.

The employee will then have a further 48 hours to provide a pathology test result that passes the "sample check". If the employee is unable to provide a specimen that passes the "sample check" within a total of 72 hours from the original site test, it will be a second presumed positive and the employee's employment will be terminated without notice.

Note: Any employee who has a medical condition that may impede their ability to provide a testable specimen is required to seek written advice from their treating medical practitioner and provide this to their direct Manager or the Responsible Manager. It is an employee's responsibility to provide in writing, from their treating doctor any medical condition that will affect alcohol and drug testing to their direct Manager.

If no medical advice has been provided to the employee's direct Manager or the Responsible Manager on the day of testing or prior to testing, the process above will apply.

5 BREACH OF POLICY

5.1 FIRST CONFIRMED POSITIVE

If an employee records a 'non-negative' test result for the first time for alcohol, illicit drugs or a legal substance without documentation, the employee will not immediately return to work. They will be taken to a designated private room at the workplace and enter discussions with the Responsible Manager and/or the Head of Human Resources regarding the non-negative result.

The employee is entitled to bring a support person. Part of this discussion will include notifying the employees' direct Manager. The direct Manager will be notified that the employee is required to leave site following a 'non-negative' result. It will also be explained that a confirmatory test conducted by a qualified toxicologist at the laboratory will advise us of the following:

- if the employee can return to work without further testing or investigation; or
- alternatively, we will be notified of the outcome with a suggested retesting date.

In addition, their manager will be advised of the alcohol or drug group the employee has produced a 'non-negative' for requiring further investigation. It is then up to the employee to decide what further discussions they would like to enter with their direct Manager. Strict confidentiality of the conversation with the employee will be maintained by all employees involved in the process.

At this point, the employee should not drive. Transportation should be arranged to their home or alternatively the employee can arrange for someone to pick them up.

Where an employee tests 'non-negative' and they have a company vehicle as part of their position, the employee is not permitted to continue using the company vehicle until further notice. Alternative transportation home will be arranged for the employee.

The employee must be provided details of the Employee Assistance Provider (EAP) and encouraged to engage with them.

A confirmatory test result can take up to a week or more to be returned to the Head of Human Resources. Human resources will contact the employee as soon as reasonably practicable upon receipt of the test result.

5.2 SECOND POSITIVE

If an employee records a 'non-negative' test result for the second time for alcohol or drugs (illicit substance or a legal substance without documentation inconsistent with declared medication) within 24 months of the recorded first positive, then the employee will not return to work. They will be taken to a designated private room at the workplace and enter discussions with the Responsible Manager and/or the Head of Human Resources regarding the non-negative result.

The employee will be advised of the likely outcome of termination should the confirmatory test be positive. The employee is entitled to bring a support person. Part of this discussion will include notifying the employee's direct Manager. The direct Manager will be notified that the employee is required to leave site following a 'non-negative' result. At this point the Manager will be notified that a confirmatory positive test will result in termination of the employee. In addition, the Manager will be advised of the drug group the employee has produced a non-negative for requiring further investigation. It is then up to the employee to decide what further discussions they would like to enter with their direct Manager. Strict confidentiality of the conversation with the employee will be maintained.

At this time the employee will be required to leave any company property they may have, with their direct Manager prior to leaving site as a precautionary measure. If the confirmatory test is negative these items will be given straight back to the employee upon their return to work.

A confirmatory test result can take up to a week or more to be returned to the Head of Human Resources. Human resources will contact the employee upon receipt of the test result as soon as reasonably practicable.

6 COMPANY ORGANISED FUNCTIONS

Adaptalift has and will continue to provide and serve alcohol at company organised functions both on and off company premises.

A General or Senior Manager must approve (in writing) any consumption of alcohol at any function held on company premises. The storage of alcohol on company premises must be approved by a General or Senior Manager and limited to the period of the company authorised event.

Three distinct types of company functions have been identified:

- Employee functions on company premises: e.g. Friday night drinks, employee updates, on site social events.
- Offsite company employee functions: e.g. Christmas parties, social events.
- Organised customer functions: Including but not limited to cocktail parties, dinners, sporting events and any other function for the purpose of entertaining customers both on and off company premises.

The BrAC limit of 0.00% will not apply at the above correctly authorised Adaptalift functions. All employees are however expected to observe the company's code of conduct, Adaptalift policies and procedures and the law.

Any breach of the code of conduct at a company function may be subject to disciplinary action as defined by the code. It is the responsibility of all employees of the company to report anyone they reasonably suspect to have breached the code to their supervisor/manager.

Controls for Company Functions Serving Alcohol

When the company organises a function at which alcohol is provided, whether at an external licensed venue or on company premises, the following controls apply to ensure safety, manage risk, and uphold company standards.

Pre-event planning & communication

- Ensure the area for the event is conducted in a non-operational area such as tearoom, boardroom, training room or similar. If conducted in an operational area, all operations must cease for the duration of the event.
- Confirm the type and quantity of alcohol to be served is appropriate for the size and nature of the event.
- Communicate to all attendees that alcohol will be available and remind them of the company's code of conduct and behaviour expectations.

- Provide clear information about transport options to and from the event/venue (public transport, ride-share, shuttle, taxis) and encourage attendees to plan a safe way home.
- Ensure food (hearty meals or substantial catering) and non-alcoholic beverages (including water) are available throughout the event.

For on-premises events where no licenced bar or professional staff is present:

- Limit alcohol to a small selection of beverages (e.g., beer, wine, or pre-measured drinks).
- Assign a responsible company staff member(s) to monitor alcohol service and consumption.
- Establish simple service rules (e.g., maximum of 2-3 standard drinks per person, no self-pouring after a set time).

Alcohol service & consumption controls

- Alcohol must be served via designated points or by a responsible staff member, rather than freely accessible to everyone.
- Monitor consumption throughout the event: assign staff or “responsible individuals” to watch for signs of intoxication or unsafe behaviour.
- Communicate and enforce limits on consumption per attendee (for example, a maximum of 2-3 standard drinks).
- Encourage attendees to pace their drinking and alternate alcoholic beverages with water or soft drinks.
- Reiterate that no one underage may consume alcohol.

Behaviour, conduct, and safety

- The company’s code of conduct remains in force during the event: respect for others, no harassment, no unacceptable behaviour.
- If a guest appears intoxicated or behaves inappropriately, responsible staff may refuse further service, escort the person to a safe area, arrange transport home, or ask them to leave the event.
- Include non-alcohol-focused activities or entertainment to reduce emphasis on drinking.

Post-event & transport home

- Facilitate safe departure and encourage ride-share, taxis, public transport, or designated drivers.
- For on-premises events, ensure staff monitor attendees leaving to reduce risk of driving under the influence.
- Document any significant incidents (over-consumption, misconduct, transport issues) and review post-event for future improvements.

Roles, responsibilities & compliance

- Event organisers must ensure these controls are applied and that the event aligns with the company AOD policy and workplace safety obligations.
- Responsible staff member monitoring controls should not consume alcohol.
- Attendees are expected to comply with the controls and plan safe transport if consuming alcohol.
- Violations may trigger disciplinary processes consistent with company policy.
- Review events and controls after each function to maintain best practice.

7 DRUG AND ALCOHOL EDUCATION PROGRAM

7.1 OVERVIEW

Adaptalift will ensure that all employees complete Adaptalift's AOD Education Program when they commence employment.

Adaptalift will also provide refresher AOD Education to all employees at an interval of no longer than 36 months since completion of the prior AOD Education Program.

7.2 MANDATORY COMPONENTS OF THE EDUCATION PROGRAM

Adaptalift's AOD education program contains the following components:

All employees

- General AOD awareness
- Adaptalift's policy on AOD use
- AOD testing in the workplace
- Support and assistance services for people who engage in problematic AOD use
- Information about the potential risks to aviation safety from problematic AOD use.

Managers and supervisors

- How to identify and manage employees who engage in problematic AOD use.

7.3 AOD EDUCATION PROGRAM

7.3.1 All Employees

On completion of the AOD Education Program employees are required to acknowledge and sign the Adaptalift Policy Declaration Form indicating that they are required to obliged to always abide this policy.

7.3.2 Contractors, Subcontractors and Volunteers

On completion of the AOD Education Program employees are required to acknowledge and sign the Adaptalift Policy Declaration Form indicating that they are required to obliged to always abide this policy.

8 VARIATIONS

Adaptalift may implement variations or amendments to this policy from time to time and, where relevant, will provide written notice to its employees setting out these changes.