



1.0 PURPOSE

This procedure describes the responsibilities of people, testing processes, and consequences in relation to alcohol and other drugs.

2.0 SCOPE

This Procedure applies to all SIMEC Mining and Liberty Primary Steel sites or leases and to employees, contractors and their employees or visitors.

3.0 REFERENCES

Work Health and Safety Act.

Work Health and Safety Regulations.

Rail Safety National Law (South Australia) Act

Road Traffic Act

Harbours and Navigation Act

Mines and Works Inspection Act

Mines and Works Inspection Regulations

Formal Disciplinary Action Guidelines

AS/NZS 4308 Procedures for collection, detection and quantitation of drugs of abuse in urine.

ARI-WHS-SYS-POL-005 Fitness for Work – Alcohol and other Drug Policy

WI 29.242 Alcohol and Other Drugs in the Workplace - Supervisor Guide

Drugs, Poisons and Controlled Substances Act

WI 29.545 Drugs and Alcohol Testing Procedure

4.0 DEFINITIONS

“Authorised Company Officer” means the Safety Manager Whyalla Steelworks, the Mining Health & Safety Manager or nominated deputy, the Manager of a mine, and any operations, maintenance or plant manager.

“Accredited Person,” means a person accredited by Transport SA as an owner/operator of a railway network under the Rail Safety Act.

“Manager of a mine” means a person appointed under the Mines and Works Inspection Regulations

“Fit for Work” means that workers are able to carry out their normal duties with the exercise of adequate skills, knowledge and reasonable care for their own safety and the safety of any other person; and that the blood alcohol level is below the legal limit and that there are no detectable levels of illegal drugs in their system



"Railway Safety Work" means any of the following classes of work (whether paid or unpaid), which is carried out on land owned by, leased to or by, or licensed to or by SIMEC Mining and Liberty Primary Steel or any of its subsidiaries on Eyre Peninsula in the State of South Australia:

- work that involves or relates to the driving or operation of a train, trains or other rail track vehicles; or
- work that involves or relates to the control of the movement of a train, trains or other rail track vehicles; or
- work that involves or relates to the design, construction, repair, maintenance, upgrading, inspection, testing or removal of rail infrastructure or rolling stock; or
- work that involves the loading or unloading of trains; or
- other work of a kind prescribed as "railway safety work" by regulations made pursuant to the Rail Safety Act (SA).

"Railway Employee" means any of the following persons:

- Any person (including, but not limited to, employees and contractors of SIMEC Mining and Liberty Primary Steel) who does Railway Safety Work; or
- Any person that supervises Railway Safety Work.

"Train" means one or more units of rolling stock coupled together, at least one of which is a locomotive or other self-propelled unit.

"Blood Alcohol Concentration (BAC)" means a concentration of grams of alcohol in 100 millilitres of blood

"Legal limit" means the prescribed alcohol concentration as defined in relevant legislation, as amended. Those limits are as follows

- Any person accessing or working on the SIMEC or Liberty Primary Steel sites will be 0.000% BAC
- For those involved operating a vessel or is a member of the crew of a vessel - 0.000%BAC;

"Illegal Drug" means opiates, sympathomimetic amines, cannabis metabolites, cocaine metabolites and benzodiazepines as defined in AS/NZS 4308 or drugs illegal by Australian law.

"Detectable levels of illegal drug" means drug levels as defined in Australian Standard 4308 - Procedures for collection, detection and quantitation of drugs of abuse in urine. Where these illegal drugs are not specified in AS 4308, the detectable levels are determined by accredited laboratories.

"Negative" This means a result below the nominated level used for initial screening / testing.



“Non-negative” This is an initial positive result obtained by an accredited tester using a screening device. This screening result is then subject to confirmatory testing by an external accredited testing laboratory.

“Positive” This is where a non-negative screening result has been subsequently confirmed positive by an external accredited testing laboratory. An alcohol result that is detected above the Company limit, using a calibrated device is also considered positive.

5.0 ACTIONS

5.1 Overview

5.1.1 SIMEC Mining and Liberty Primary Steel is dedicated to maintaining a safe work environment and seeks to protect anyone on site from unsafe acts and conditions. Every employee must ensure that they are not, by the consumption of alcohol or a drug, in such a state as to endanger their own safety at work or the safety of any other person at work

5.1.2 The possession or use of an illegal drug or alcohol in the work place also poses unacceptable risks for safe, healthy and efficient operations. In addition, the possession or use of illegal drugs is a criminal offence and will not be tolerated in the workplace

5.2 Objective

5.2.1 The objective of this programme is to provide a safe workplace and ensure compliance to any legislative or legal requirements including the Rail Safety Act, Drug and Alcohol testing requirements. The programme will apply to SIMEC Mining and Liberty Primary Steel employees, contractors and their employees, and visitors on the SIMEC Mining and Liberty Primary Steel site or leases.

5.2.2 The aim of this programme is:

- To ensure that whilst conducting work, employees and contractors' employees are provided with a safe working environment, which minimises the risk of injury due to any act or omission by themselves or others.
- To ensure that SIMEC Mining and Liberty Primary Steel meets its safety and legislative obligations to employees, contractors and to the general public.
- To provide assistance through a range of preventative, educational and rehabilitative measures to overcome drug and alcohol problems that could impair an individual's fitness for work.
- To ensure that all employees who are deemed unfit for work due to drugs and alcohol are dealt with in an effective, fair and constructive manner.



5.2.3 Consultation between management and employees will include discussion of the effective implementation of the programme.

5.3 Duty of Care Responsibilities

5.3.1 SIMEC Mining and Liberty Primary Steel and individual employees have obligations under the South Australian Work, Health and Safety Act and Regulations, Rail Safety Act and Regulations, and any other relevant legislation and Common Law.

5.3.2 Duty of the employer

Under common law and relevant Occupational Health, Safety and Welfare legislation, SIMEC Mining and Liberty Primary Steel is obliged to provide safe work places and safe systems of work and to eliminate hazards in the workplace. Part of the duty of care includes taking reasonable precautions to ensure all individuals are in a fit state to work so as to minimise risks both to themselves and others.

5.3.3 Duty of individuals

Anybody who accesses this site has a duty to take reasonable care so as not to expose themselves or others to unnecessary health or safety risks. An important part of this duty is to ensure that they are not in such a state as to endanger their own safety at work or the safety of any other person, through consumption of alcohol or other drugs, including prescription medication that can affect performance (eg Panadeine Forte). They also have a duty to identify and report safety issues to their supervisors.



5.4 Responsibilities Of Managers/Supervisors And Individuals

5.4.1 Managers / Supervisors

Where appropriate and practicable, managers and supervisors are responsible for assessing the fitness for work of individuals under their control, at the start of and throughout the work period.

Supervisors are responsible for taking prompt and appropriate action whenever they believe an individual is not capable of working in a safe and effective manner. This includes;

- isolating the individual from the workplace and any hazards,
- after discussion with the individual, and where appropriate, organise alcohol and other drug testing,
- provide assistance for the individual's safe return home,
- documenting all occasions when an individual is deemed unfit for work or when performance is affected,
- providing effective feedback to the employee concerning their performance or safety,
- assisting the individual to access support and assistance such as the Employee Assistance Programme (EAP).

Although confidentiality exists between the employee involved and relevant Company officers in respect of the Alcohol and Other Drugs programme, this confidentiality does not extend to where a supervisor is required by law to make reports as required under any applicable legislation (e.g. the Rail Safety Act) or as required under Company practices.

Depending on the location of work, trained and authorised Shift Team Leaders / Supervisors / Managers can be required to conduct Drug and Alcohol Tests in order to support their site Alcohol and Other Drugs programs and company testing requirements.

5.4.2 Individuals

Individuals must not be at work with any blood alcohol concentration or with detectable levels of illegal drugs in their system.

Individuals must present themselves at work in a condition in which they are able to carry out their duties without risk to themselves, others or the plant. This principle also applies to out of hours call-in.

Individuals must notify supervision of any concerns about impairment or potential impairment of their fitness for work; this includes effects of prescription drugs.

All individuals have a legal obligation to notify their supervisor if any other individual who may be unfit for work, or when they become aware of unauthorised possession or consumption of alcohol or drugs on the worksite by another individual.



5.5 Education

Information will be provided so that employees will be aware of the health and safety implications of alcohol and other drugs abuse. Particular attention will be given to the recognition of the early indication of drug and alcohol abuse.

5.6 Prescription And Over The Counter Drugs

The use of prescription or over the counter drugs may impair an employee's ability to perform safely or efficiently.

There are several classifications of drugs that may impair performance:

- Hypnotics, sedatives and anti-depressants of the benzodiazepine type
- Antihistamines
- Stimulants and appetite suppressants
- Analgesics / Codeine
- Plus others

If a prescribed drug could cause impairment, the effects should be determined and limitations on normal duties assessed. Any limitations will be treated as is currently the case (ie if appropriate alternative duties are available they will be provided, otherwise the employee may be required to take sick leave).

Individuals must ensure that any prescription or over the counter medication is taken safely. This requires individuals to;

- discuss with the prescribing medical practitioner the nature of their duties and to ascertain any possible side effects of the medication which may impact on their safety or performance at work, and
- notify their supervisor of any medication they are taking which could affect their safety or performance at work, and
- taking any medication strictly in accordance with the medical practitioner's or manufacturer's recommendations, and
- report any side effects to their medical practitioner and to advise their supervisor.



5.7 Testing For Alcohol And Other Drugs

Testing will only be initiated by an authorised company officer. For Railway Safety Work the company officer will also be authorised under the Rail Safety Act. All testing procedures will comply with Australian Standard 4308 and the Rail Safety Act. Urine that has been collected in accordance with AS 4308 may be tested for other illegal drugs.

The Administrating Authority of the Rail Safety Act, Transport SA, may require an accredited person to carry out random testing (in accordance with procedures set out in the regulations under the Rail Safety Act) of persons who are about to carry out, or who are carrying out, railway safety work on a railway owned or operated by the accredited person to ensure compliance with sections 30 (1) & (2) of the Rail Safety Act.

A sample of urine will be tested on site using a drug panel test kit. In the case of a non-negative result, the urine sample will be sent to an independent, accredited laboratory for confirmation testing.

In the case of initial screening or blanket testing a saliva screening test may be used. In the case of a non-negative saliva result a urine sample will be taken and sent to an independent, accredited laboratory for confirmation testing. All confirmatory testing will be performed using urine.

Blood alcohol concentrations (BAC) using a breath analysing instrument. If a positive test result is recorded a subsequent test will be carried out twenty (20) minutes later. The results of the subsequent test will be taken as the final result for the purposes of the screening. A positive result is where the level is greater than 0.000% BAC.

Where there is a dispute in respect to a positive result for alcohol, the employee will be offered a voluntary blood test that will be assessed by independent laboratory analysis. The cost of this analysis will be at the employee's expense if the result is confirmed as positive.

SIMEC Mining and Liberty Primary Steel will test for other drugs in accordance with Australian law, Australian Standard AS/NZS 4308 and the Rail Safety Act. A non-negative result for the screening test conducted on this site is where there is a detectable indicator identified of the possible presence of drugs.

A person who provides a non-negative result for drugs must inform the screening officer of any prescribed or over the counter drugs taken within the last 14 days that may influence the results. The person must sign the appropriate forms and present evidence of this medication to Security within 24 hours.



5.8 Testing Processes For Alcohol And Other Drugs

The following processes of testing are included in the Alcohol and Other Drugs Testing programme.

- Pre-employment and Pre-placement (transfers) assessment
- Employee self testing
- Testing for apparent intoxication or suspected impairment (drugs or alcohol)
- Serious incident testing
- Random testing (anywhere or any time on SIMEC Mining and Liberty Primary Steel, this includes the main gate, and at the discretion of SIMEC Mining and Liberty Primary Steel).
- Retesting until negative to return to work
- Testing at the discretion of SIMEC Mining and Liberty Primary Steel as part of the 12-monthly retest program for those who have tested positive.

5.8.1 Pre-Employment and Pre-Placement Testing

Pre-employment and pre-placement medical assessments will be required as part of the Whyalla Steelworks selection process. This includes a screening for alcohol and other drugs.

Site access will be denied to anyone who tests positive to drugs or alcohol and site access cards will be suspended until a negative result is provided.

5.8.2 Employee Self Testing

Employees have the opportunity to self-test off site “without prejudice”. If, as a result of an employee self-test an individual notifies their respective supervisor that they will not be commencing work, then their absence may be treated as leave without pay.

5.8.3 Testing Following Serious Incident

Testing will occur where;

- Individuals are involved in incidents that resulted, or could have resulted, in death or serious injury, or
- Individuals are involved in collisions of vehicles, or
- Individuals are involved in incidents resulting in plant or equipment damage.



5.8.4 Testing For Apparent Intoxication or Suspected Impairment

Testing may also be carried out in the following circumstances at the discretion of the Company authorised person;

- Where an individual's erratic, altered or dangerous behaviour raises concern that the individual may be influenced by alcohol or other drugs.
- Where any other person in the work place who has reasonable grounds to believe that an individual may be affected by alcohol or other drugs and where the supervisor also believes that this may be the case, for example the smell of alcohol.
- If any evidence is found of possible alcohol or other drug use at work (eg drug paraphernalia, alcohol containers on worksites or in vehicles) and it can be identified with reasonable certainty those who may be involved.

5.8.5 Random Testing of Employees, Contractors Employees, and Visitors

All persons entering the SIMEC Mining and Liberty Primary Steel are subject to random testing for alcohol and/or other drugs. Random testing may also include random selection of drivers of vehicles and their passengers at the main gate or anywhere on the works.

Any person undergoing a random test that provides a non-negative result must advise the tester if they are taking or have taken over-the-counter or prescription drugs within the last 14 days. Some over-the-counter drugs are in the same drug group as those that are being tested for and therefore may show up as a positive screen (see 5.12.8)

5.8.6 Blanket / Campaign Testing

Testing of the whole work site or part of the work site may be done at the request or direction of the Liberty Primary Steel Lead Team. Blanket testing can be undertaken at any part of the workplace at any time during a shift.

Test types and may include:

- Alcohol breath test only; or
- Oral Saliva drug test;
- Urine testing
- And/or a combination of above.

Oral Saliva testing may be used for initial screening and blanket drug testing. A non-negative Saliva test will then proceed to a confirmation drug urine test as indicated by the tester.

5.9 Tampering With An Alcohol Or Drug Test Sample

Tempering / adulteration of a drug test means undertaking any act with the intention of altering / falsifying the test result.

This may be identified by the test equipment (i.e. temperature, dilution, PH, etc) or via observations made by the donor / testing environment by the person administering the drug test



Note: For all employees and/or contractors who carry out railway safety work, it is an offence to tamper with a test under the Rail Safety Act, maximum penalty \$10,000

5.10 Possession or Consumption of Alcohol or Illegal Drugs

Being in possession of or consuming alcohol or illegal drugs in the workplace constitutes serious misconduct and unless mitigating circumstances exist, employees who contravene this rule will be dismissed. Contractors' employees and visitors will be banned from site.

5.11 Refusal to Undertake a Test

Refusal by an employee to submit to, or cooperate fully with the administration of an alcohol or other drug test will be treated in the same manner as any other refusal to comply with SIMEC Mining and Liberty Primary Steel policies or procedures. The same will apply for refusal to sign the 'Declaration for Fitness for Work'.

Refusal will result in the employee being counselled as to the consequences of the refusal. If an employee still refuses to undertake a test the following will occur:

- For Rail safety work, the Rail Safety Unit, Transport SA will be notified as required under the Rail Safety Act.
- A disciplinary discussion will take place with the department head and appropriate disciplinary action will be taken based on all the circumstances. As a minimum, this will result in the refusal being treated in the same manner as a positive test result.

Contractors' employees or visitors who refuse to undertake a test will be banned from site. Contractor supervision will be notified of the refusal to participate.

Note: For all employees and/or contractors who carry out railway safety work, it is an offence to refuse to undertake a test under the Rail Safety Act, maximum penalty \$10,000

5.12 Employee Registering A Confirmed Positive Result

The following will apply for a confirmed positive alcohol or other drug test result:

- 1 Where an employee records a non-negative site-screening test for drugs the Supervisor will be notified.
- 2 Where an employee records a BAC above 0.000%, the Supervisor will be notified. A BAC reading above the legal limit will result in the conducting of testing for other drugs.



- 3 Where an employee is above the company limit they will be sent home on unpaid leave. If laboratory results indicate a false positive, the employee's wages will be reimbursed. SIMEC Mining and Liberty Primary Steel will arrange to transport the person home.
- 4 In the event of a positive result being for alcohol or other drugs (illegal or otherwise) other than cannabis, the employee or contractor will present themselves for their next shift and undergo a further test). The employee must ensure they are fit to drive themselves to work or arrange alternative transport at their expense.
- 5 The employee will be provided with a copy of the laboratory drug test results if requested
- 6 If the subsequent test is positive for alcohol or non-negative for other drugs where there is an increasing level then that recorded on previous occurrence will be treated as a further non-negative result. Employees recording a non-negative result which has not increased in level will be required to remain on unpaid leave up to and including seven (7) working days, or 56 working hours, until a negative result is recorded. Only when the test is negative will the employee be able to return to work. If, after seven (7) working days unpaid leave, employees are able to make application for access to any accrued leave eg annual or long service leave.
- 7 In the event of the positive result being for cannabis, the employees will present themselves for their next normal working shift to undergo a further test. Only when the test is negative will the employee be able to return to work. If an employee is still showing a non-negative test result after one (1) week then the level of cannabis will be determined by the laboratory tests. If the trend of the laboratory test results shows statistically increasing levels, then the occurrence will be treated as a further positive result.
- 8 Where a non-negative screening test result is recorded due to the consumption of a prescription or over the counter medication the employee may provide a declaration. (Refer: Attachment No.2 – 'Declaration for Fitness Form')

The declaration is to attest that they have consumed a prescribed or over the counter medication and that they are fit for work. Within 24 hours the person must provide proof of their prescribed medication (i.e. a prescription). A person not willing to sign the declaration form cannot be deemed as fit for work and shall be required to take leave without pay. A person making a false or misleading declaration is subject to formal disciplinary action and may result in termination of employment.

The employee will be deemed fit for work based on the declaration, except in the instance when it is apparent to the supervisor, based on observations, that the person is not fit for work. If the supervisor



deems the person unfit, then they may be sent home on paid or unpaid leave at the discretion of the supervisor.

- 9 Employees will be advised by their Manager or in their absence, their nominated deputy, of the availability of counselling and medical help. Mandatory attendance will form part of a disciplinary action.
- 10 If the employee tests positive for drugs, or for alcohol over the company limit the employee will be required to undergo testing at the discretion of SIMEC Mining and Liberty Primary Steel for a period of twelve months.
- 11 Where a person records a confirmed positive result for alcohol above the company limit or illegal use of drugs, or refuses to undertake a test, appropriate disciplinary action will be taken. All the circumstances, including employees full work history, will be taken into account when determining the appropriate disciplinary action, which may result in dismissal.

Where a person records a confirmed positive result for alcohol above the company limit and for illegal use of drugs, disciplinary action will be taken, which will likely result in dismissal.

Any positive of multiple classes of drugs and / or alcohol will be treated cumulatively.

For railway safety work, Transport SA - Rail Safety Unit, will be notified as required under the Rail Safety Act.

5.13 Disciplinary Record

Any disciplinary action under the alcohol and other drugs programme will be dealt with in accordance with the Company's Formal Disciplinary Action Guidelines.

Typically, where the circumstances deem it appropriate employees in breach of the Alcohol and Other Drugs programme will be treated as follows;

- First positive result: Final written warning for serious misconduct / in breach of their employment obligations and is unacceptable. The employee is required to attend EAP counselling or other medical assistance, and provide proof of such attendance to their supervisor. The employee is required to undergo testing at the discretion of SIMEC mining and Liberty Primary for a period of twelve months.
- Second positive result: Termination of employment. In line with the LifeSavers Program

Other disciplinary action (as per Formal Disciplinary Action Guidelines) may be taken should the full circumstances surrounding the result so warrant.



Any action taken will be at the discretion of the Company.

If a person does not have a repeat positive result or refusal to undertake a test within twelve months from the date of the last positive result or refusal to undertake a test, previous results or refusals will be considered null and void.

5.14 Drug and Alcohol Rehabilitation Principles and Guidelines

The company recognises alcohol and other drug dependency as a medical condition. Employees who suspect they have an alcohol or other drug use condition are encouraged to seek advice and to take appropriate treatment before their job performance is impaired. Employees may seek assistance through the Employees Assistance Program (EAP). Participation in the program is confidential. Information that the person divulges will not be passed on to anyone without written permission of the person concerned. Non-confidential information for statistical purposes or confirmation of attendance may be provided to the Safety Manager Whyalla Steelworks or nominated deputy.

5.15 Contractors

Contractors working on the SIMEC Mining and Liberty Primary Steel site will be required to adopt and implement an Alcohol and other Drugs programme. That programme should as a minimum include a testing programme including random testing, testing for apparent intoxication and serious incident testing. It shall use the same range and testing limits of Alcohol and other Drugs as the SIMEC Mining and Liberty Primary Steel programme or lower. Evidence of the above will be required to be presented to the Safety Manager Whyalla Steelworks.

If contractors are unable to implement an alcohol and other drugs programme then they may make use of the SIMEC Mining and Liberty Primary Steel programs and facilities for testing SIMEC Mining and Liberty Primary Steel will charge contractors for the cost of testing.

If a contractors' employee tests positive for Alcohol and other Drugs, they will be immediately prohibited from going on site, or removed from site as the case may be, and their employer notified to ensure that they are safely removed from site. Under no circumstances will a contract employee returning a positive test be allowed back on site until a further test has been administered and a negative result has been obtained.

Only alcohol and drug tests performed by SIMEC Mining and Liberty Primary Steel nominated representatives will be accepted as a final clearance that the employee, contractor or visitor is allowed back on site.

Issues of employee discipline and payment would be a matter for determination by the Contractor.

Notwithstanding the above and at its absolute discretion, SIMEC Mining and Liberty Primary Steel reserve the right to test contractors' employees.



Contractors are expected to educate their employees in the health and safety implications of Alcohol and other Drugs use.

SIMEC Mining and Liberty Primary Steel reserve the right to deny contract employees access to the site at its absolute discretion.

Tampering or adulteration with an alcohol or drug sample may result in the Contractors' employee being banned from the site.

Any contract company with a worker who is found to have a positive drug test will be required to demonstrate that a management plan is in place to prevent recurrence before they will be permitted back on site. Following a second positive the individual will be banned from Liberty Primary Steel and Simec sites.

5.16 Visitors

Anyone accessing SIMEC Mining and Liberty Primary Steel sites or leases will be covered by this policy and will be expected to comply with its requirements. Under no circumstances will the visitor be allowed back on site until a further test has been administered and a negative result has been obtained.

SIMEC Mining and Liberty Primary Steel reserve the right to deny visitors access to the site at its absolute discretion.

Tampering with an alcohol or drug sample may result in the visitor being banned from the site.

Visitors travelling on organised bus tours who do not alight from the bus during the tour are exempt from the SIMEC Mining and Liberty Primary Steel Alcohol and Other Drugs Testing Program.

A visitor under the age of 18 years old will be required to obtain written permission from their parent / guardian (using the SIMEC Mining and Liberty Primary Steel Parental Consent Form – refer Attachment No. 1) to participate in the SIMEC Mining and Liberty Primary Alcohol and Other Drugs Testing Program before being allowed on site.



5.18 Confidentiality

A person must not disclose information about another person except where the disclosure of information is permitted if it is:

- A disclosure in the course of official duties (eg health nurse, emergency services officers, other authorised testing officers, Manager - Health & Safety, or nominated deputy).
- A disclosure for statistical information (requested by Government Authorities)
- A disclosure made with the consent of the person to whom the information relates, or furnished the information
- A disclosure required by tribunal or court
- A disclosure to a Statutory Authority (eg ReturnToWorkSA, SafeWork SA, Transport SA – Rail Safety Unit).
- A disclosure authorised by the Work Health and Safety Regulations.

Anyone accessing SIMEC Mining and Liberty Primary Steel sites or leases will be covered by this policy and will be expected to comply with its requirements.

6.0 DOCUMENTATION

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|-----|------------------|---|---|
| 6.1 | Attachment No. 1 | - | Parental consent form, Alcohol and Other Drugs Testing Program. |
| 6.2 | Attachment No. 2 | - | Declaration for Fitness for Work |
| 6.3 | Attachment No. 3 | - | Execution Sequence for BAC 0.00% |



Parental Consent Form, Alcohol & Other Drugs Testing Program

SIMEC Mining and Liberty Primary Steel is dedicated to maintaining a safe work environment and seeks to protect anyone on site from unsafe acts and conditions. It is a condition of employment and entry onto SIMEC Mining and Liberty Primary Steel sites that no one has a blood alcohol concentration in excess of the prescribed limit and with no detectable levels of illegal drugs in their system.

SIMEC Mining and Liberty Primary Steel has an Alcohol and Other Drugs Testing program (Quality Procedure QP 29.25). This testing program allows for pre-employment, random, incident and suspected impairment testing. All persons including employees, contractors and visitors are subject to this testing program when they enter any SIMEC mining and Liberty Primary site.

Persons who are directed to participate in the testing program will be required to give a breath sample for alcohol consumption screening and a urine sample for other drugs screening in accordance of Australian Standard AS4308 *Procedure for collection, detection and quantitation of drugs of abuse in urine*. Persons registering a confirmed positive result for alcohol and/or illegal drugs will be refused entry onto the site. Persons refusing to undertake the tests will be treated in the same manner and be refused entry onto the site.

Parental consent is required for persons who are under 18 years of age and are required to enter any SIMEC Mining and Liberty Primary Steel site and be subjected to the Alcohol and Other Drugs Testing program.

I, (full name of parent/guardian) _____

of (residential address) _____

(town/city) _____ (State) _____ (postcode) _____,

give my permission for (child's name) _____

to provide a breath and/or urine sample for the purposes of screening for alcohol consumption and intake of other drugs in accordance with Fitness for Work Policy.

Parent/Guardian name (please PRINT)

Signature

Date



Declaration for Fitness for Work

I,		
First Name	Second Name	Family Name
of		
Home Address	Suburb	Post Code
employed by		
Name of the Company you are employed by		Employee number: if employed by SIMEC /Liberty Primary
I declare that the non-negative drug screening test recorded by me on Day Month Year was not due to my use of an illicit substance or an illegal or prohibited prescription medication.		
I declare that I am fit for work, as defined by the SIMEC Mining and Liberty Primary Steel Alcohol and Other Drugs Testing Programme, and that my non-negative screen result on this date is due solely to my consumption of the following medication(s)		
Medication name	Medication name	Medication name
Medication name	Medication name	Medication name
which I have consumed in accordance with the specifications of the manufacturer and/or the recommendations/prescription of my medical practitioner.		
I will provide proof of my prescription within 24 hours to the person conducting the screen testing or their representative.		
I am aware that the consumption of drugs can lead to impaired performance, putting the health and safety of others and myself at risk. Given the severity of the consequences, I understand that the provision of false or misleading information in regard to this matter will result in disciplinary action and may result in the immediate termination of my employment. I also understand that pursuant to the Work Health and Safety Act that I must ensure that I am not by the consumption of alcohol or a drug, in such a state as to endanger my own safety while at work or the safety of any other person at work.		
Employee name (Please PRINT)	Signature	Date
Witness name (Please PRINT)	Signature	Date

Evidence provided within 24 hours: (Confirm: Donor's name is correct, the medication is not dated prior to the testing date and is current)

Medication sighted by:

Security Officer's name (Please PRINT)	Signature	Date
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Proof of evidence sighted: (photo of container label, copy of prescription, declaration from Practitioner) YES

Supervisor informed if NO medical evidence sighted YES

This form (once completed) is attached to the relevant Primary Drug & Alcohol Site Testing Form

Execution Sequence for BAC 0.00%

COMMUNICATION

AS OF JULY 2018



DATE	ACTIVITY	AUDIENCE	TOOL / CHANNEL	RESPONSIBLE
31 May 2018 & 5 June 2018	Safety Council and Lead Team endorsed project (Elevator Speech).	WSWSC & WSWLT	* Meeting	Adrian Piccinin (Safety Manager WSW) & Mark Wakelin (Head of HR WSW)
5-30 June 2018	Planning meetings between HR & Safety (talk through logistics, administrative processes).	HRBP WSW & Nurse Health Hygiene	• Meetings (fortnightly)	Karen Lynch, Kate Spencer, Veronica de Kock
6 July 2018	Drug & Alcohol policy review - update relevant policies and procedures - define security's process during amnesty for readings between 0.00 and 0.05 as nobody allowed on site above 0.00 during amnesty, although Lifesavers do not apply	Safety & HR	• Meeting	Peter Rawnsley & Safety team HR endorsement
9-13 July 2018	Stakeholder analysis and communication plan to be created. Leaders pack developed for roll-out.	HR & Safety	• Change management documents • Email	HR & Safety
By 31 July 2018	Discretionary self-testing made available at main gate (alco-metre installation).	Security & Maintenance	• Email and face to face communications	Safety & Security with support from Maintenance
1 August 2018	COO to send tailored email to all WSW employees.	WSW employees	• Email	COO with support from Head of HR
1-31 August 2018	Consultation with internal stakeholders .ie. workforce, business unit, FLM, FLL.	Internal stakeholders	• Various .ie. toolbox, WGCC, meetings, noticeboards, electronic signage	Business Unit Manager with support from HR & Safety

Execution Sequence for BAC 0.00%

COMMUNICATION

AS OF JULY 2018



DATE	ACTIVITY	AUDIENCE	TOOL / CHANNEL	RESPONSIBLE
1-31 August 2018	Consultation with external stakeholders .ie. contractors, unions (IT meeting 7 August 2018 for union consultation)	External stakeholders	<ul style="list-style-type: none"> • Various .ie. toolbox, noticeboards, electronic signage, email 	Procurement with support from HR & Safety
27 August 2018	Safety brief regarding amnesty and implementation.	WSW employees	<ul style="list-style-type: none"> • Email • Noticeboards 	Safety
3-30 September 2018	Amnesty period. Ensure stakeholders have relevant communication packs and processes for this period. Old policy will still apply.	Business units leaders and security	<ul style="list-style-type: none"> • Email • Forum 	Safety & HR
10 September 2018	Safety brief regarding amnesty and implementation.	WSW employees	<ul style="list-style-type: none"> • Email • Noticeboards 	Safety
24 September 2018	Safety brief regarding amnesty and implementation.	WSW employees	<ul style="list-style-type: none"> • Email • Noticeboards 	Safety
28 September 2018	Safety brief regarding implementation.	WSW employees	<ul style="list-style-type: none"> • Email • Noticeboards 	Safety
1 October 2018	0.00% BAC rule applies with Lifesaver policies.	Anyone entering WSW	<ul style="list-style-type: none"> • Policies and procedures 	Safety