



# ***SUNCOR- PROCEDURE***

## **DRUG INTERDICTION AT SUNCOR SITES**

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### **SCOPE AND PURPOSE**

This procedure applies to Suncor Sites.

The purpose of this document is to ensure the safety of all workers, the public and the environment by minimizing the hazards associated with the possession, use, storage, distribution or trafficking of Contraband on Suncor Sites.

This document details the methods to be used in order to detect, intercept, and mitigate Contraband possession, use, storage, distribution or trafficking on Suncor Sites.

### **DEFINITIONS**

"**Affiliates**" means any Person which: i) controls a party either directly or indirectly, ii) is controlled directly or indirectly by such party or, iii) is directly or indirectly controlled by a Person which indirectly or directly controls such party. For the purposes of this definition, "control" means the right to exercise 50% or more of the voting rights in the appointment of the directors or managers of the relevant legal entity or in the management of its day to day affairs, or through partnership interests or otherwise.

"**Alcohol**" refers to beer, wine and distilled spirits, and includes the intoxicating agent found in medicines or other products.

"**Company**" means Suncor Energy Inc. and its Affiliates.

"**Contraband**" means goods that are obtained through an unlawful act or that are unlawful to possess under the law, rules or policy including any Prohibited Drugs, Unauthorized Items, any prohibited or restricted weapon or explosive device, any property of the Company or its contractors obtained unlawfully, and anything which Personnel are prohibited from possessing while on Suncor Sites, including, without limitation, Prohibited Drugs, Drug Paraphernalia and Alcohol on "Dry" (Alcohol free) Suncor Sites.

"**Dog Handler**" means a person, in control of a Sniffer Dog.

"**Drug**" means:

- (a) any drug or substance which is not legally obtainable, or has not been legally obtained, and whose use, sale, possession, purchase or transfer is restricted or prohibited by law; or
- (b) cannabis and cannabis derived products that are not authorized and possessed in accordance with the Company's Medication Standard or any contractor's equivalent policy or standard.

**"Drug Paraphernalia"** means any equipment, product or material primarily intended or designed for use in manufacturing, compounding, converting, concealing, processing, preparing, or introducing into the human body a Drug or substance This would also include any product or device that may be used to tamper with an Alcohol or Drug testing sample.

**"Employee"** refers to all regular full time, part time, temporary, casual and seasonal employees on the Company payroll and any co-op students whether on the Company payroll or not.

**"Equipment"** includes all vehicles, machinery, equipment, and aircraft.

**"Locker"** means any receptacle used to store personal belongings.

**"Locker Room"** means a location or facility that is used to house Lockers and where Personnel may store personal belongings.

**"Person"** means an individual, partnership, a limited liability partnership, limited partnership (including a limited liability limited partnership), limited liability company, joint venture, trust, business trust, cooperative, association, government, government agency or a corporation, as the case may be.

**"Personnel"** means an individual, including a visitor, present at a Suncor Site or being transported to or from Suncor Sites in Suncor Transportation.

**"Personnel's Employer"** means, in respect of any Personnel, the employer of such Personnel, including without limitation the Company or a contractor or service provider of the Company, as applicable.

**"Reasonable Cause"** means any observation or reliable information that leads to a reasonable belief that a Personnel is in possession of or concealing any Contraband upon themselves, at Suncor Sites, in Equipment, in a receptacle or in a Locker.

**"Search Team"** means a team assembled by Suncor Corporate Security that may consist of the following Personnel: Suncor Corporate Security members, Suncor Contract Security members, Dog Handlers and Personnel's Employer representatives, if applicable.

**"Sniffer Dogs"** are dogs which have been trained for the detection of Drugs or explosives.

**"Suncor Accommodations"** means those workforce accommodations owned or leased by the Company or located on Suncor Sites, including, but not limited to, Firebag, MacKay River, Voyageur, Millennium and Borealis accommodations.

**"Suncor Contract Security"** means any contracted security person by the Company in respect of all or any portion of the Suncor Sites, or duly authorized agent of Suncor Corporate Security.

**"Suncor Corporate Security"** means the internal corporate security department of the Company.

**"Suncor Facilities"** means the facilities owned or leased by the Company or located on Suncor Sites, including, but not limited to:

- Suncor Accommodations.
- Voyageur Upgrader plant site (for construction and once operational).
- Firebag Aerodrome near the Firebag plant site.
- Suncor Business Centre or any other offices in Fort McMurray.
- Company Equipment and Suncor Transportation.
- Any facilities used or provided by the Company for the purposes of transporting workers to or from Northern Alberta destinations.

- Any vehicle brought onto a Suncor Site.

"**Suncor Security**" means either or both Suncor Contract Security and Suncor Corporate Security.

"**Suncor Sites**" means the oil sands plant site at Tar Island, the in situ plant site, construction and operations at Firebag and MacKay River and all Company leased, owned or operated oil sands and in situ properties and extraction, crude bitumen processing and related Suncor Facilities generally located north of Fort McMurray, Alberta, as such properties and Suncor Facilities may be modified, increased or expanded from time to time by any means, including (without limitation) by acquisition, joint venture or merger.

"**Suncor Transportation**" means any vehicle or aircraft used to transport Personnel to or from Suncor Sites and, including, without limitation, those provided by the Company.

"**Unauthorized Items**" means any goods which, by policy or law, are not allowed onto or to be removed from Suncor Sites.

"**Without Warning**" means periodic and unannounced.

## **IMPLEMENTATION**

### **1.0 Search of Site**

Searches may include the use of Sniffer Dogs and Dog Handlers. Suncor Sites contain signage both in and around buildings indicating that Drug and Alcohol use and possession will not be tolerated and that Sniffer Dogs and Dog Handlers may be used.

#### **1.1 Without Warning and Reasonable Cause Searches**

All areas of Suncor Sites, including all Equipment located thereon, are subject to Without Warning and Reasonable Cause searches. This will include but not be limited to all Company operations areas, mining, maintenance facilities, tank farms, drilling facilities, administration buildings, and any third party operating facility located on Suncor Sites.

#### **1.2 Search Frequency and Specificity**

Suncor Corporate Security or Suncor Contract Security (at the direction or as authorized by Suncor Corporate Security) will perform Without Warning and Reasonable Cause searches of Suncor Sites, including all Equipment located thereon, and may be assisted by Sniffer Dogs and Dog Handlers. The times and locations of searches will not be revealed to anyone outside of the Search Team or those with a legitimate business need to know prior to the searches being conducted. All Search Team members will be contacted the morning of the search. No other information will be divulged.

#### **1.3 Method**

Upon arrival at the pre-determined meeting location, all Search Team members will demonstrate to one another that they are not in possession of any Contraband prior to initiating the search. This will be acknowledged by all Search Team members by signing and dating an acknowledgement and attendance sheet.

The Search Team will perform the search of a location such as an operating area, mine site, administration building and any areas within, such as Locker Rooms, lunch rooms, Equipment, or any other location on Suncor Sites. The Search Team will proceed to a specific area as designated by Suncor Corporate Security.

During the search of the area, no Personnel will be allowed to enter the area; they will be asked to wait outside until the search is complete. Personnel refusing to comply with this directive will be identified and may be subject

to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee.

Should the area consist of locked Lockers, the following standard will apply: The Dog Handler and Sniffer Dog will search the secured and unsecured Lockers. If the Sniffer Dog indicates the presence of Contraband, the Search Team will be called-in to search the area by hand. No hand-search of the area will be performed if the Sniffer Dog does not indicate the presence of Contraband. The only exceptions to this would be in cases where there was no indication by the Sniffer Dog, but there was still an obvious presence of Contraband that is plainly visible or there was Reasonable Cause.

If a hand-search of the area is in order, none of the contents of the area will be off-limits to the Search Team. This means that all property inside the area may be inspected, including all locked or secured Lockers or containers within the Locker. The Search Team may elect to cut locks in order to obtain access. If a lock is cut, a suitable replacement will be installed by the Search Team once the search is concluded, and a note will be left on the Locker informing the Personnel affected to go to the security office to obtain the new key or combination.

If the Search Team cannot obtain entry to a container inside a Locker or elsewhere for the purpose of inspection, the area may be sealed-off from all future access, until such time as the Personnel can be asked to open the container in the presence of the Search Team. If the Personnel refuse to allow access for inspection, he or she will be deemed to be non-compliant with this Procedure, and may be subject to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee.

At the conclusion of the search, the Search Team shall attempt to return the area to its former state to the best of its ability. Care will be taken not to damage the Personnel's property.

If Contraband is discovered during a search, the items will be seized by the Search Team and the incident will be documented as per Section 5 below. Photographs of the area, and/or any Contraband shall be taken. Further, the Contraband will be reported as per Section 6 below. The applicable Personnel's Employer will be contacted immediately and informed of the incident. If Contraband is discovered in a Locker, the Locker will be sealed by the Search Team until such time as the Locker is packed up by the applicable Personnel's Employer. The Personnel's Employer is responsible to ensure that the Personnel's contents are packed up and the Personnel leave the premises immediately. Suncor Security will collect all Company-issued identification cards and/or applicable keys at the time of the Personnel's departure from the Suncor Site.

If no Contraband is found within a Locker area it will be re-secured once the search is complete, and Personnel will be allowed to enter the area again only after it has been secured.

All searches will be executed with respect, care and professionalism. With exception to Contraband being reported within an incident report, the Search Team will hold in confidence the contents of all searched areas. Any information pertaining to Personnel will only be disclosed to those with a legitimate need to know.

## **2.0 Search of all Operational and Common Areas within Suncor Sites**

A Search Team may elect to perform Without Warning or Reasonable Cause searches of all areas within Suncor Sites including (but not limited to):

- ⇒ Administration buildings, including kitchens;
- ⇒ Aerodromes or facilities used to transport Personnel to or from Suncor Sites;
- ⇒ All Equipment on Suncor Sites, including heavy hauler equipment in the mine;
- ⇒ All maintenance and/ or repair facility areas;
- ⇒ Boiler/utility rooms;
- ⇒ Transport - buses and light vehicles;

- ⇒ Food preparation and dining areas. However, search with the Sniffer Dogs will not be performed if food is being prepared or exposed at the time (as per health directives);
- ⇒ Locker areas including Lockers themselves;
- ⇒ Lounges, smoking areas;
- ⇒ Operational plant areas when safe to do so and with direction of the area manager;
- ⇒ Maintenance areas when safe to do so and with direction of the area manager;
- ⇒ Pedestrians;
- ⇒ Phone rooms;
- ⇒ Storage rooms;
- ⇒ Suncor Accommodations;
- ⇒ Suncor Transportation; and
- ⇒ Washrooms.

These searches may take the form of patrols with the Sniffer Dog and Dog Handler, and/ or simple inspection by Suncor Security.

Incidental to a search, Sniffer Dogs may indicate the presence of Contraband on Personnel in the area. If this is the case, the Personnel will be requested to accompany the Search Team to a private area, where he or she will be asked to produce for inspection the contents of his/her clothing pockets or any baggage that he or she is carrying. The Search Team may also proceed to the Suncor Accommodations (if applicable) or Equipment, as applicable, for a subsequent search if that Equipment is on a Suncor Site. Should the Personnel refuse to submit to a search, he or she may be deemed to be non-compliant with this Procedure and may be subject to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee.

### **3.0 Search of Equipment**

All Equipment on Suncor Sites is subject to Without Warning or Reasonable Cause searches. As directed by Suncor Security, the Sniffer Dog and Dog Handler may accompany the Search Team for searches of any Equipment within Suncor Sites. The Sniffer Dog will be allowed to sniff all areas (including walking within truck box areas) outside of such Equipment. If the Sniffer Dog indicates the presence of Contraband on or in Equipment, a Search Team member will remain with the Equipment until the operator is contacted and attends to the location. Any Contraband will be seized and reported as per Sections 5 and 6 below. Personnel that fail to permit the Search Team to search the Equipment may be deemed to be non-compliant with this Procedure and may be subject to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee. Should the Personnel fail to show up, the Personnel's Employer will be contacted and apprised of the situation. This may result in a representative of the Personnel's Employer obtaining another key to allow the Search Team to access the Equipment. In the case of a visitor on site, if the visitor fails to allow the Search Team to search the Equipment, they will immediately be asked to leave Suncor Sites and a site ban may be issued. Should the Equipment be a privately owned vehicle and no one shows up to it, the permit holder will be apprised of the situation and will be asked to allow access to the vehicle for search purposes. A permit holder that fails to permit the Search Team to search the vehicle may be deemed to be non-compliant with this Procedure and may be subject to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee.

### **4.0 Searches at the Suncor Sites Outer Checkpoints**

Suncor Sites are equipped with an outer security checkpoint specific to one or more operating areas. The purpose of these checkpoints is to control Personnel and Equipment access to these locations. Multiple operating areas may be located beyond a security checkpoint. The security function is to control Personnel and

Equipment access to Suncor Sites. In addition to these outer checkpoints, security procedures may also be imposed to control access to or from Suncor Sites by Suncor Transportation.

Suncor Security stationed at any of these checkpoints may request of any Personnel entering or leaving Suncor Sites, to submit to a search of their Equipment and belongings. Suncor Security stationed at the Firebag Aerodrome or any Suncor Facility used to transport Personnel to or from a Company worksite in Northern Alberta, may conduct searches of belongings of Personnel entering or leaving the Firebag Aerodrome or Suncor Facility. Any of these searches may take the form of a simple hand-search by Suncor Security, or may be assisted by a Sniffer Dog and Dog Handler. Personnel that fail to permit Suncor Security to search their Equipment or their belongings may be deemed to be non-compliant with this Procedure and may be subject to disciplinary action if they are an Employee or removal and potential banishment from Suncor Sites if they are not an Employee.

Visitors attempting to access Suncor Sites with Contraband will be denied entry and the authorities may be contacted as appropriate. This is in addition to the standard seizure, documentation, and reporting of the incident.

All vehicular traffic, including all buses and pedestrians, may be subject to this type of search at Suncor Sites outer checkpoint, including the Firebag Aerodrome. This includes Personnel, Suncor Transportation, commercial vehicles, and buses.

## **5.0 Handling of Seized Items**

All Contraband encountered by Suncor Security or a Search Team at Suncor Sites or checkpoint will be seized immediately upon discovery. All seized Contraband will be bagged (except for Alcohol), identified and tagged. The tag will be used to seal the bag and will include the names and signature of at least two Search Team members. All seized items will be secured as soon as reasonably practicable in a suitable evidence locker after being properly documented. Contraband (except for Alcohol) will be reported to the Royal Canadian Mounted Police ("RCMP") and will be held in evidence lockers until picked-up by a RCMP officer.

The RCMP will be responsible for disposal, if required, of Contraband (except for Alcohol). All evidence turned-over to the RCMP will be documented by Suncor Security as to date and time of turn-over, as well as to which RCMP officer took possession. For certainty, seized Alcohol at "Dry" (Alcohol free) sites such as Firebag will be disposed of by Suncor Security, per established procedures.

As part of the incident investigation, Suncor Security may test seized substances with drug test kits in order to determine the identity of the substance if needed.

## **6.0 Incident Reporting**

Security incident reports will be electronically maintained within Company approved data bases. Suncor Security will document all incidents with respect to this Procedure at Suncor Sites and Suncor Site checkpoints including:

- ⇒ All organized Search Team efforts that have been executed, indicating which areas were searched that day, and at which times;
- ⇒ All incidents of a Sniffer Dog indicating the presence of Contraband anywhere on Suncor Sites, regardless of the outcome of the subsequent hand-search;
- ⇒ All incidents of a Sniffer Dog indicating the presence of Contraband within Equipment at Suncor Sites or parking lot, regardless of the outcome of the subsequent hand-search;
- ⇒ All incidents of Contraband being encountered by Suncor Security or anyone else on a Search Team during either routine or special duties;
- ⇒ Personnel who fail to cooperate or comply with the instructions of Suncor Security or a Search Team.

- ⇒ For example, by not staying outside of the area once asked to do so; Suspicious behavior or activities; and
- ⇒ Voluntary turn-ins of Contraband.

A security incident report need not be completed for a search at Suncor Sites or checkpoints where Contraband was not discovered or encountered, due to the frequency and nature of these types of searches.

All security incident reports will be completed in a timely manner. Once completed, these reports may be shared with the following bodies for information or for action if there is a legitimate need to know:

- ⇒ Members of the Company's senior management;
- ⇒ First line supervisors of Personnel;
- ⇒ Company Human Resources and/ or Labour Relations departments;
- ⇒ If the subject of the report is a contractor, relevant personnel from the contractor's management, human resources, or health & safety departments;
- ⇒ The RCMP or any other enforcement body, as applicable;
- ⇒ Company project or contract coordinators;
- ⇒ Company legal department;
- ⇒ Company BA-specific EHS Manager; and
- ⇒ Any other parties or persons relevant to the action, management, or investigation of the incident, as deemed by Suncor Corporate Security.

## **ROLES & RESPONSIBILITIES**

Suncor Corporate Security shall:

- ⇒ Direct the day-to-day operations of Suncor Security and other relevant contract providers with respect to this Procedure;
- ⇒ Ensure that security incident reports are accurate, timely, and forwarded to the appropriate parties; and
- ⇒ Monitor the program for compliance and success, and steward to Company management.

Company Labour Relations (Human Resources) shall:

- ⇒ Review all security incidents and issue site bans accordingly;
- ⇒ Review and assess any disputes; and
- ⇒ Ensure the union is contacted where appropriate.

## **REFERENCES TO RELATED DOCUMENTS**

LMP0057A – ALCOHOL & DRUGS PROCEDURE LMS0034A - SEARCH PROGRAM

LMS0056A – FIREARMS AND AMMUNITION SESOOOIA – PREVENTATIVE SECURITY

LMS0074A – CONTRACTOR PRE-ACCESS ALCOHOL AND DRUG TESTING