

Workplace Alcohol and Drug Policy

Introduction

All members of the iA Financial Group (the "Company") are committed to health, safety and wellness in the workplace. For this reason, the Company strives to maintain a zero-tolerance standard for unauthorized use of Alcohol, Illegal Drug, Marijuana and Medication in the Workplace.

The use of Alcohol, Illegal Drugs, Marijuana, and Medication can adversely affect a worker's health, safety and job performance. Accordingly, this Policy details the standards and expectations associated with the use of Alcohol, Illegal Drugs, Marijuana, and Medication in the Workplace.

Purpose

The Company's objectives in implementing this policy are to:

- Help raise employee awareness and inform and educate them with a view to preventing the unauthorized use of Alcohol, Illegal Drugs, Marijuana and Medication in the Workplace
- Promote open communication, prevention and prompt resolution of incidents involving the unauthorized use of Alcohol, Illegal Drugs, Marijuana, and Medication in the Workplace

Who is Covered by This Policy?

This Policy applies to all Employees of the Company who work in any Company Workplace, whether at Head Office or in a business office, with a member company or at an agency office while engaged in Company business, or while working on or off Company premises, including without limitation while driving Company vehicles.

Definitions

In this Policy:

Alcohol means the intoxicating agent in alcoholic beverages, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol.

Drug Paraphernalia means any equipment, product or material intended or designed for use in manufacturing, mixing, transforming, concealing, processing, preparing or administering an Illegal Drug or Marijuana that has not been medically authorized.

Employee(s) means all regular full time, part time, temporary, casual, co-op, summer and seasonal employees on the Company payroll, and includes independent contractors while working for the Company.

Illegal Drug means any drug which has not been legally obtained or is not legally obtainable and whose use, sale, possession, purchase or transfer is restricted or prohibited by law, including but not limited to Medication obtained without a valid prescription.

Impairment or Impaired means an inability to function normally or safely, or to productively perform all of the duties of employment, without any limitations, because of intoxication, or loss of mental capacity due to the use or after-effects of Illegal Drugs, Alcohol, Marijuana or Medication.

Marijuana means cannabis, as listed under Schedule II of the *Controlled Drugs and Substances Act*, S.C. 1996, c. 19.

Medication means a substance obtained by the Employee (i) legally without a prescription and intended for individual consumption, or (ii) through a physician's prescription or legal authorization, or (iii) through a Health Canada authorization. Medication includes, without limitation, medically authorized Marijuana.

Workplace means any place where the Company or employee conducts the company's business and all Company owned property, including outdoor spaces. For the purposes of this policy, "Workplace" includes Company sponsored social events and Company business functions (such as conferences, seminars) and teleworking.

Policy

Except as outlined in the **Social Situations** section below, the Company has a zero tolerance for the use of Alcohol, Illegal Drugs and Marijuana in the Workplace.

The following are prohibited while in the Workplace:

- Reporting to the Workplace or being at the Workplace while Impaired
- The consumption, use, possession, cultivation, manufacture, storage, distribution, offering or sale of Alcohol, Illegal Drugs, Marijuana and Drug Paraphernalia, unless otherwise permitted in accordance with the Social Situations section below

If an Employee reports to work and is reasonably suspected to have reported to work, or appears to be carrying out his or her job functions while Impaired, they may be prohibited from continuing to work.

Roles and Obligations Under This Policy

The company

- The Company will provide all Employees with a copy of this Policy.
- The Company will provide information, instruction and assistance to any Employee whose performance may be impacted by the use of Alcohol, Illegal Drugs, Marijuana or Medication, in order to protect the health and safety of Employees and the Workplace.
- The Company will provide assistance to any Employee who voluntarily seeks assistance for Alcohol, Illegal Drug or Marijuana dependency or abuse, or addiction to Medication, and will put them in touch with the appropriate resources while maintaining confidentiality to the greatest extent possible in the circumstances (as further detailed in "**Confidentiality**," below).
- The Company will take appropriate steps to investigate any possible violation of this Policy (as further detailed in "**Investigations**," below).

Employees

- Read, understand and abide by this Policy, as well as their responsibilities under it.
- Report and remain fit for work (i.e. not Impaired) at the Workplace and while carrying out their duties and responsibilities.
- Use prescribed Medication responsibly and seek appropriate guidance and notify Human Resources through the Sick Leave team at sickleave@ia.ca regarding Medications that may cause Impairment (as further detailed in "**Medication**," below).
- Seek advice and follow appropriate treatment if the Employee has a current or emerging Alcohol, Illegal Drugs, Marijuana or Medication addiction or abuse problem, and follow return to work protocols or monitoring programs after attending treatment, if any (as further detailed in "**Voluntary Disclosure and Assistance Offered by the Company**," below).
- Notify a manager or a Human Resources representative if an Employee believes another Employee is Impaired at the Workplace or that there has otherwise been a breach of this Policy.

Managers

- When managers are informed of an inappropriate situation that may violate this Policy, they must advise a Human Resources representative of the situation to determine what further steps may be required.
- Managers monitor Policy compliance and take appropriate action as required by this Policy.

Social Situations

Subject to any site-specific limitations, responsible Alcohol use may be permitted at Company sponsored meetings or social functions ("**Social Situations**"). The Company reminds its Employees that the Code of Business Conduct is still in effect in Social Situations and any Alcohol consumption in Social Situations is expected to be done responsibly and in moderation. Employees are also expected to ensure that the use of Alcohol in Social Situations does not impact their ability to perform their duties and responsibilities in the Workplace.

Employees are strictly prohibited from engaging in the use of Marijuana in or during the course of Social Situations.

The Company has a zero-tolerance policy with respect to the use of vehicles while an Employee is Impaired. Employees must arrange for alternate transportation in such circumstances. The Company will take responsible action to ensure safe transportation for all participants in Social Situations where Alcohol is being served by the Company.

Medication

Employees are expected to use any Medication for its intended purpose only and in the manner directed by a physician, pharmacist or manufacturer.

If an Employee is required to take Medication that could cause Impairment or impact the Employee's ability to carry out his or her job functions, including medically authorized Marijuana, he or she must inform the Sick Leave team sickleave@ia.ca of this fact as soon as possible and prior to starting the Medication, if possible. Once notified, the Company will determine if accommodation is required (see "**Accommodation**" below).

The use of Medication that is disclosed in accordance with this Policy will not result in disciplinary action, but may require modified job functions or responsibilities, reassignment or other forms of accommodation, as appropriate in the particular circumstances and to the point of undue hardship (for further details, see “**Accommodation**” below). In such a situation, the Company will reserve the right to request documentation to confirm the Employee’s ability to perform their job functions, assess related limitations and give the Employee alternate job functions or responsibilities, as applicable and appropriate.

Investigation

The Company will investigate any violations or suspected violations of this Policy including, but not limited to, the following situations:

Suspected presence of Alcohol, Illegal Drugs, Marijuana or Drug Paraphernalia

The Company reserves the right to investigate any situation when there are reasonable grounds to believe that Alcohol, Illegal Drugs, Marijuana or Drug Paraphernalia are present in the Workplace in violation of this Policy. Managers are responsible for identifying situations where an investigation is justified based on a combination of indicators which could include, without limitation, signs of Impairment, behaviour, or the odour or presence of Alcohol, Illegal Drugs, Marijuana or Drug Paraphernalia. Human Resources must be consulted and will make the final decision as to whether and how to initiate an investigation. The investigation may include a search of Company property.

Unfit for Work

In all situations when an Employee appears to be Impaired, the Employee will be escorted by Human Resources to a private place, interviewed, and given an opportunity to explain why they appear to be Impaired.

The Employee will be given an opportunity to provide a reasonable explanation for their behavior or condition, and Human Resources will take action appropriate to the situation, which may include:

- Requiring the provision of additional information including medical information to address any request for accommodation
- Referral for medical attention if there are immediate medical concerns (for example, to a health center, local hospital or clinic)
- Removal from the workplace for a period of time as determined by Human Resources

Disciplinary Measures and Sanctions

Based on the findings of the investigation, Human Resources will make a decision as to whether this Policy has been violated and what steps, if any, will be taken as a result.

The Company will discipline an Employee who fails to comply with this Policy. Discipline may include a variety of reasonable measures, including, without limitation, referral to counselling, mandatory completion of a dependence/abuse treatment or rehabilitation program, suspension (with or without pay) and termination of employment for just cause. Determination of the appropriate disciplinary measure will depend on the facts surrounding each case, including the nature of the violation, prior violations, response to corrective programs and the seriousness of the offence.

Voluntary Disclosure and Assistance Offered by the Company

Employees who believe that they may have an Alcohol, Illegal Drug, Marijuana, or Medication dependence, addiction or abuse problem are fully encouraged to seek assistance from the Sick Leave team, sickleave@ia.ca. The Employee and Family Assistance Program is also available for any Employee who wishes to access services from external resources in these circumstances.

Employees in need of assistance due to Alcohol, Illegal Drug, Marijuana, or Medication dependence, addiction or abuse may request accommodation from the Company, including but not limited to, a leave of absence to seek treatment or rehabilitation. The Company will take all reasonable steps to provide reasonable accommodation in these circumstances in accordance with legal requirements, up to the point of undue hardship (see “**Accommodation**” below).

Employees who disclose that they have an Alcohol, Illegal Drug, Marijuana, or Medication dependence, addiction, or abuse problem may be subject to certain conditions, monitoring programs or other return to work protocols, which will be developed on a case by case basis through Human Resources, and, where appropriate, in conjunction with recommendations from the Employee’s treatment provider(s).

No adverse employment action shall be taken against an Employee because they voluntarily disclose to the Company, prior to a breach of this Policy, a personal Alcohol, Illegal Drug, Marijuana, or Medication dependence, addiction or abuse problem. However, Employees may not avoid disciplinary action, up to and including termination of employment for just cause, by making such voluntary disclosure following a violation of this Policy, if the circumstances warrant that such action be taken.

Accommodation

The Company will comply with its obligations under applicable human rights legislation to achieve a safe work environment that is supportive of employees who request accommodation for the use of Medication that may cause impairment or due to a disability such as an Alcohol, Illegal Drug, Marijuana, or Medication, addiction, dependence or abuse problem. The Company will provide reasonable workplace accommodation to such employees, short of undue hardship, where required by law.

The Company's and Employees' roles in respect of any accommodation process are as follows:

Role of the company

- Foster an inclusive work environment by treating employees who require accommodation with respect and dignity
- Deal with requests for accommodation in a timely, confidential and sensitive manner
- Provide individual accommodation where it is required to the point of undue hardship

Role of employees

- Advise the Sick Leave team sickleave@ia.ca of the need for accommodation when the Employee has an Alcohol, Illegal Drug, Marijuana, or Medication addiction, dependence or abuse problem
- Provide updated medical documentation in support of their request for accommodation
- Comply with reasonable requests by the Company to attend independent medical examinations if the Company deems it necessary
- Accept a reasonable offer of accommodation that meets their needs, even if it is not their preferred accommodation option

Confidentiality

Every effort will be made to keep confidential information received by the Company as a result of this Policy (including but not limited to information received in the context of an investigation). However, where there is any risk to the health or safety of other employees, disclosure of such information may be made to the extent necessary to address or remedy the situation. Furthermore, disclosure may be made to appropriate authorities where required by law.

All parties to an investigation – complainants, accused, managers, witnesses, Human Resource representatives – are required to maintain confidentiality and to discuss the situation only with those involved in the investigation. A deliberate breach of confidentiality will be considered a breach of this Policy and will result in disciplinary action up to and including termination of employment for just cause.

Only information pertaining to an Employee's functionality (e.g. whether the employee is fit for work and/or subject to any restrictions) may be shared with management for the purposes of determining appropriate work accommodation and/or return to work protocols. Further access to such information is limited to those who have a legitimate need to monitor the Company's compliance with relevant laws and management policies.

INVESTED IN YOU.