



Lusail Real Estate Development Company

Health, Safety, Security, Environment, Logistics & Quality Department

Lusail Construction Safety Management Procedure – Substance Abuse

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COMPANY PROPRIETARY INFORMATION

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Amendment Record

This document is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Rev .No	Description / Comments	Prepared By	Checked By	Approved By	Issue Date
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1. Introduction

This element of the Lusail Construction Safety Management Procedures (LCSMP) explains Lusail’s requirements for Contractors with regards to substance abuse testing.

This Procedure applies to all Contractors, Developers, Consultants and subcontractors working on the Lusail project. Company-specific Substance Abuse Policies (SAP) shall adequately demonstrate/describe the Contractor’s commitment to the management of substance abuse among their employees.

2. Definitions

Term	Description
BAC	Blood Alcohol Concentration
EAR	Employee Assistance & Rehabilitation
HSE Critical Positions	Employment positions in the construction industry which involve activities that can place workers at risk, unless the person has full, unimpaired control of their physical and mental capabilities
SAP	Substance Abuse Policy

3. Lusail Substance Abuse Policy

Lusail concentrates on awareness and prevention of substance abuse. Substance abuse includes the use of alcohol, the use of illicit drugs, and the misuse of legal drugs. Lusail conducts its business consistent with high standards for the health of its employees. The initiative and scheme is to protect Lusail’s business activities.

The following guidelines in this element are in compliance with Qatari legal requirements and industry best practice.

4. Responsibility

All Contractors, Developers, Consultants and subcontractors working on the Lusail projects shall develop their own internal company SAP that meets or exceeds the guidelines in this Procedure. Lusail shall undertake an annual audit of the Contractor’s SAP.

Project Management is responsible for the assurance that the SAP is documented and implemented by a trained competent person who is responsible for conducting random testing, if required by the company Policy.

Contractors must inform all personnel under their control that in the event of post incident testing, personnel could be tested against the legal criteria of ‘Zero Tolerance’ at the work place.

Lusail expects Contractor Project Management to cooperate fully with law enforcement officials. Contractors shall hand over to the custody of the law any suspected illegal substance discovered on site.

Any employee who witnesses substance use or abuse by a coworker, or has reason to suspect a violation of company policy, must immediately report it to their supervisor.

An employee taking prescription medication which may alter his/her physical or mental abilities must provide his employer with medical certification issued by the prescribing physician. Documentation need indicate that the employee is able to safely and adequately perform his/her duties while using the prescribed medication. Employee must not be assigned duties which he/she is not able to perform safely, whilst using such prescribed medication.

If prescription medication impairs the employee’s performance and that impairment cannot be reasonably accommodated, that employee will be dismissed from work.

Any employee who does not notify his supervisor of prescription medication use cannot hold Lusail liable for resulting personal behavior or policy violations.

Intentional misuse of prescribed medications on the jobsite, or prior to arrival on the jobsite, will result in disciplinary action, up to and including termination.

It is the responsibility of the employee to ensure that they are obeying the laws of Qatar at all times, and to be aware that under Qatari law, a zero tolerance criteria will be applied to any post incident test.

5. Post Incident Testing

Lusail has a zero tolerance policy for positive post incident test results involving the use of alcohol, illicit drugs, and the misuse of legal prescribed medications.

Substance abuse testing may be conducted where substance abuse is suspected to have contributed to the cause of an incident. Post incident testing may be conducted by representatives of the Ministry of Interior (e.g. Police,) where there is damage to public property or personal injury, and in all road traffic incidents.

6. For Cause Testing

Where the behaviour or condition of an employee is observed by colleagues and/or a supervisor to be impaired, or where the employee is considered to be a potential threat to their health and safety, or that of their colleagues, Lusail reserves the right to quarantine the employee and summon the Police with instructions to perform a substance abuse test. This is classified as For Cause Testing.

7. Random Testing

Lusail is authorized to conduct Random Testing of employees for alcohol only.

This form of testing is applied to all Health Safety & Environment (HSE) critical positions, and designated Management positions. Personnel in these positions, if under the influence of alcohol may become a threat to our business, the environment, and to the health and safety of our employees.

For Random Testing, Lusail has defined the maximum acceptable blood alcohol content concentration as 0.05% Blood Alcohol Concentration (BAC). Alcohol use at or above this level can impair judgment, behaviour, or the capability of a person to perform assigned duties in a safe and productive manner.

8. Employee Assistance & Rehabilitation Program

Employees who believe they have a substance abuse problem are encouraged to come forward and seek help and support.

Contractor SAP program should contain the following employee assistance and rehabilitation programs:

- Consulting- with company health care professional or a counselor
- Educational program on substance abuse, facilitated by Human Resources (HR) or HSE department.
- Referral to professional treatment facilities for dependency. The HR department will communicate the Company SAP to all employees.

Although assistance will be provided with rehabilitation, being in the program is not an excuse for substance abuse, and dependency will not be allowed as a mitigating circumstance in a disciplinary process.

9. Testing Criteria for Random Alcohol Testing & Disciplinary Action

9.1 Blood Alcohol Concentration (BAC) <0.05% - Trace

Employee is reminded of the SAP and program; in particular, the zero tolerance element of the Policy.

Non-Positive results are to be entered into a database (Employee Testing Register).

Because Qatari Law is zero tolerance while driving a vehicle, the employee will be held at the testing point with the vehicle until a company representative arrives to collect the employee and the vehicle.

9.2. BAC of $\geq 0.05\%$

9.2.1 First Confirmed Positive Test:

- ◆ Formal written counseling with test result documented
- ◆ Results entered into (Workers' testing register)

- ◆ Copy of results put in employee’s HR file
- ◆ Immediately stop employee from working
- ◆ Employee referred to HR for arrangement of employee assistance and rehabilitation

9.2.2 Second Confirmed Positive Test:

- ◆ Formal written counseling with test result documented
- ◆ Results entered into (Employee Testing Register)
- ◆ Copy of results put in employee’s HR file
- ◆ Immediate removal from worksite
- ◆ Employee referred to HR for potential disciplinary actions

10. Legal Consideration- Background

There are no express prohibitions on the random screening of employees for drugs or alcohol intoxication under Qatari law; however, the screening process should be carried out in a way that:

- ◆ Is not discriminatory
- ◆ Is not unduly physical
- ◆ Does not humiliate or offend the dignity of the employees

Random alcohol screening is only justified if reasonable in all the circumstances, i.e. because the consequences of such employees performing their duties under the influence of alcohol would be serious.

The random alcohol screening/testing element of Lusail’s SAP is applied to all HSE critical positions and designated Management positions, as the consequences of such persons performing their duties under the influence of alcohol would be serious.

There is no random drug screening/testing element of the Lusail SAP because a drug test result, positive for any of the substances scheduled in Qatari Law 9 of 1987, would place an obligation on the employer’s medical officer, and the employer, to report the matter to relevant authorities (Article (186) of the Penal Code).

Information generated from the substance abuse testing process is inherently sensitive and is treated as confidential. Lusail, Contractors, Developers, Consultants and subcontractors will, in implementing this policy, take care to:

- Elect a qualified security/medical staff member, who is adept in performing alcohol testing.
- Manage all positive test cases as privately as reasonably practicable.
- Limit the number of Management personnel involved in such tests, searches, and investigations, and limit the distribution of information collected only to the HR Department and persons authorized by HR.
- Caution personnel to avoid communication of confidential information to unauthorized persons, including family members, friends, etc.

11. Equipment & Process, Supplemental Information

Testing equipment shall be maintained and calibrated according to manufactures specifications. Calibration result and records are kept on site, for audit purposes.

Testing shall be witnessed by medical/ security/ HSE/ or senior Management personnel.

Employees shall give consent and sign the Employee Testing Register to acknowledge receipt of information pertaining to the following, at a minimum:

- ◆ Sufficient information about the periods of the workday that compliance is required
- ◆ Specific information concerning prohibited employee conduct
- ◆ Circumstances under which an employee will be tested

- ◆ Test procedures, employee protection, and integrity of the testing process, and safeguarding the validity of the test
- ◆ The prerequisite that tests are administered in accordance with this Lusail Procedure
- ◆ An explanation of what will be considered a refusal to submit to a test instruction, and the potential consequence
- ◆ Available EAR program of intervening when a problem is suspected
- ◆ The consequences of a positive result, including termination
- ◆ Information on the affect of alcohol use on:
 - An individual's health
 - Employment
 - Quality of work
 - Personal life