



Drug and Alcohol Policy
Business Unit Norway

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1. Purpose

This Policy is intended to prevent the use or abuse of legal or prohibited substances among employees of ConocoPhillips (“Company”) and all others who perform work or services for Company. The purpose is to prevent placing individuals or Company's safety and work performance at risk. Company views substance abuse as a significant hazard to health and safety and wants to reduce problems caused by abuse to the greatest extent possible.

Company has zero tolerance towards employees or third parties who do not obey this Policy.

Furthermore, the purpose of this document is to make employees aware of the possible damage that the use or abuse of drugs or alcohol can cause. Company views the abuse of and addiction to drugs or alcohol as something that can be prevented, and is of the opinion that employees who have a substance abuse problem can be helped. Company's health service will provide advice and support for the rehabilitation of employees who admit to having a drug and/or alcohol problem even before a violation of the Policy has occurred. Employees who have, or are developing, a substance abuse or addiction problem should contact medical personnel as soon as possible. Failure to comply with this requirement may provide grounds for serious disciplinary actions such as termination or dismissal.

The Drug and Alcohol Policy is an integral part of Company's health, safety and environment work (HSE), and is consistent with Company's global Drug and Alcohol Policy and Code of Conduct.

2. Principles of this Policy

1. Company prohibits the use, possession, transfer, or sale of illegal drugs in the workplace or at work.
2. Personnel must report to work unaffected by drugs and alcohol, and remain unaffected while they are at work.
3. Many prescription and non-prescription medications have side effects that can affect one's abilities with respect to safe and efficient work. Employees or third parties who participate in Company's activities and operations, and are taking medications, are responsible for obtaining the necessary information to determine whether the use of such medications can impair their productivity and reduce their ability to perform their work safely and in accordance with all relevant safety regulations. These employees should therefore discuss their duties with their pharmacist or doctor to determine whether the use of prescription and/ or non-prescription drugs negatively impacts their ability to perform their work in a completely safe manner. In order to avoid any violation of this Policy, employees should contact the Company health service for an assessment of their medication regarding any possible negative impact on safe work performance.
4. Company reserves the right to conduct searches for illegal drugs and paraphernalia associated with narcotics and drugs. This includes screening cargo and mail.

3. Scope

This Policy applies to Company's employees and all other employees or third parties who perform work or services for Company, be it offshore or onshore:

1. During working hours and/ or when the employee is participating in gatherings/ events organized by Company.

In addition to the normal work situation, this includes all situations where the employee represents Company, thereby performing work for Company, or represents Company's interests (courses, meetings, similar events, etc.).

Exception:

Company notes that alcohol is sometimes served at events organized by Company or when employees represent Company at similar events. See more about this in Section 7 – Use of alcohol at internal events and in connection with representation.

2. During free time:

Company has the right to take appropriate disciplinary actions if it can be documented that an employee in an intoxicated state has damaged Company's property, or other property/ assets Company has at its disposal (houses, apartments, cars, offices, cabins, boats, etc.).

Use, sale, or transfer of illegal drugs is a violation of this Policy and will result in disciplinary action.

In the event of a third party violation of this Policy, the person will be reported to their own employer, where the violation will be handled in accordance with the employer's own terms, conditions, and procedures. Such violations may furthermore affect Company's contractual relationship with that person's employer.

4. Violations of this Policy

1. Transfer or sale of illegal drugs in the workplace or work-related context will trigger immediate expulsion from the workplace and may provide a basis for dismissal.
2. An employee's violation of this Policy will in general be considered a disciplinary offense, which can provide grounds for a written warning, offer of an AKAN agreement or termination. The employee will normally receive a written warning and an offer to enter into an AKAN agreement on first offense. Repeated violations of the Policy will normally provide grounds for termination.
3. In the event of violations of this Policy by third parties who perform services for Company, the person will be immediately expelled from Company's facilities/ installations, and reported to his or her own employer. Such violations may furthermore affect Company's contractual relationship with that person's employer.
4. Employees who refuse to take a drug test or subsequently refuse to allow Company access to the test results will be subject to disciplinary action as described below:

Offshore employees:

The employee will be given a written warning, and will normally be suspended for the offshore period with subsequent leave period. A new test will be required prior to the next departure. If the employee again refuses to take the test, this will normally constitute a basis for termination or other disciplinary actions.

Onshore employees:

The employee will be given a written warning, and will normally be suspended until a new date for testing is agreed. If the employee again refuses to take the test, this will normally constitute a basis for termination.

5. Definitions

5.1. Drugs

The term "drug" includes alcohol, illegal drugs, narcotics, prescription and non-prescription drugs, and other substances that can be inhaled, injected, ingested, or otherwise absorbed by the body and can alter a person's mood, comprehension, coordination, reaction, or judgment.

5.2. Illegal or prohibited substances

An illegal or prohibited substance refers to a substance that has not been obtained by persons authorized to do so. Prescription drugs purchased illegally or not prescribed by a licensed physician are also considered illegal or prohibited substances.

5.3. Prescription medicines/ non-prescription medicines

Prescription or non-prescription medicines refer to all substances prescribed by a licensed physician for health reasons, or substances that can be purchased without a prescription.

5.4. Alcohol

Any alcohol-based product that can cause intoxication.

5.5. Substance abuse

Use of drugs (including willful abuse of non-prescription or prescription medicines) while the employee is at work, or is off work, if this leads to absenteeism or work-related problems.

5.6. Positive test results

Test results that demonstrate the presence of alcohol or illegal drugs at or above the levels stipulated in legislation, and when a medical advisor/ Company doctor has confirmed the result as positive. Company reserves the right to change these levels to the current limits set by the Division of Forensic Medicine and Drug Abuse Research, Norwegian Institute of Public Health, or by legislative amendments.

5.7. Taking of samples in the event of reasonable grounds for suspicion

Samples taken in situations where a special incident, behavior or work performance provides reasonable grounds to assume that substance abuse can be a contributing factor.

5.8. Random testing

Unannounced substance abuse tests of randomly selected employees from a predefined safety critical function/ position.

6. Responsibility for implementation of this Policy

1. The President of Company has overall responsibility for implementing this Policy and will delegate the responsibility to the respective Business Unit managers.
2. The Company Human Resources Manager has been appointed as the coordinator of the Policy.
3. Department heads and other managers are responsible for:
 - a) Being aware and attentive to behavior, actions, or workmanship which may indicate that an employee or third party has a substance abuse problem; and referring, in collaboration with the Company health service and Human Resources (HR) Department, the employee for assessment/ testing, or informing the third-party's employer.
 - b) Notifying the Company health service so that it can arrange testing "in the event of reasonable grounds for suspicion". The manager shall in all cases document in writing the reasons for requiring such tests. A copy of this documentation shall be attached to the employee's personnel file.

- c) Implementing any disciplinary action (in consultation with the HR Department).
 - d) Encouraging employees to voluntarily contact the Company health service if they have a drug problem and to participate in the AKAN treatment and rehabilitation program. Note that participation in a treatment and rehabilitation program does not necessarily preclude disciplinary action against the employee for misconduct or other agreement violations relating to or caused by the substance abuse.
 - e) Ensuring that all employees and contractors in this business area are familiar with the Policy and the procedures it entails.
4. Company will consider a failure by the manager to take the above steps as dereliction of duty.
 5. Deviations from this Policy will not be tolerated unless approved by the Human Resources Manager following application.

7. Use of alcohol at internal events and in connection with representation.

Company notes that alcohol may be served at events organized by Company, or when individuals represent Company at similar events. It is expected that all employees and third parties involved in Company's activities behave responsibly and ensure that any form of alcohol consumption does not have harmful effects on safety (this includes driving), work performance, attendance at work, or is otherwise likely to damage Company's interests and/or reputation. Individuals who consume alcohol at such events should not return to the office or workplace on that day.

8. Procedures for taking samples and performing tests

Company, through a service provider, will conduct testing of Company employees for substance abuse in accordance with laws and regulations. Contractors must arrange for testing of their own personnel. Testing in the event of reasonable grounds for suspicion applies to both Company employees and contractors. Random drug testing and pre-employment testing applies to safety-critical functions/ positions.

Data related to the sample, including any reports, must be stored securely and confidentially and in accordance with the Personal Data Act by the laboratory handling the samples and by the medical advisor.

A positive test – as defined above – will result in the offer of an AKAN agreement and may be subject to disciplinary action, such as a written warning or dismissal.

8.1. Checking medications at the heliport

When departing for offshore, the individual's private medications (usually medications that are prescribed by a licensed physician) must be handled in accordance with "Procedure for transporting medications to the shelf."

The Human Resources Department (on-duty officer) shall be informed by the heliport's security personnel if:

- There are medications that are not covered by the procedures.
- There are medications that have been concealed or hidden on purpose.
- The Company health service concludes that the medications were most likely intended for intoxication, or to reduce withdrawal symptoms following substance abuse.

Violation of the above procedure may result in disciplinary measures such as suspension, termination or dismissal.

Note also that the employee must be sober/ unaffected by alcohol or other drugs when he or she checks in at the heliport prior to departure to offshore.

8.2 Pre-employment testing

In connection with external recruitment, Company will inform applicants within safety-critical functions/ positions of the drug testing requirement in connection with the compulsory pre-employment medical examination. Job offers are made contingent on an approved medical examination.

8.3 Taking of samples in the event of reasonable grounds for suspicion:

In most cases where samples are taken due to reasonable grounds for suspicion, there will be a delay between the taking of samples and the test results. In those cases where the drug test is performed due to reasonable suspicion of intoxication, the employee may be temporarily suspended from his or her position until the test results are ready.

Conduct and situations that may give rise to reasonable suspicion of intoxication, and which may justify a drug test include:

- Attendance at work or other situations where the employee represents Company, including performing work for the company (for example, courses, meetings, etc.), under the influence.
- Performing work in a negligent manner, especially when this leads to personal injury or property damage.
- In the aftermath of accidents where there are reasonable grounds to believe that substance abuse has been a cause.
- Other factors in the course of the employee's work performance that could give reason to suspect that the employee is under the influence of a drug.
- Discovery of drug-related paraphernalia in the workplace.
- During and after rehabilitation.

8.4 Random testing

Company has the right to perform random testing of its employees, in accordance with applicable laws and regulations and Company has discussed the program with the elected union representatives. Company has a written procedure that clearly describes the process of random selection and the sampling methods that are used. Company can only carry out random sampling of personnel with safety-critical functions/ positions that involve particular risks. This is to protect the life or health of the person employed or third parties, and to protect the environment, equipment, and Company's reputation.

8.5 Alcohol test

If there are reasonable grounds to suspect that an employee comes to work, or other work situations (courses, meetings, etc.), while he or she is under the influence of alcohol, the employee will be asked to take an alcohol test.

If the suspicion is confirmed by a positive blood alcohol test showing a concentration of 20mg/100ml or higher:

- The employee will be asked to leave the workplace, course, meeting, etc., and be refused departure to offshore.
- His/ her manager and the company health service must be informed.
- The manager and the HR Department should urgently meet with the employee, where he or she will have the opportunity to explain themselves. Minutes must be written and signed. The employee may have an elected union representative or other representative present.
- The Company health service may ask to take more samples where applicable.

Company's procedures for disciplinary action must be followed, and appropriate disciplinary action will be taken (see Item 9 of the Working Regulations).

If an offshore employee submits a sample showing a blood alcohol level below 20/mg/100ml, the employee may report for departure the following day. The table below describes the procedure depending on the blood alcohol concentration.

8.5.1 Table Blood alcohol concentration

Blood alcohol concentration (BAC) mg/100ml	Actions at the Heliport	Actions taken by the Company health service, HR Department and the line manager	Actions in relation to onshore employees
Less than 20	Heliport notifies Company. Flying is not permitted.	The Company health service is notified. Flying the following day.	In the event of suspicion: The Company health service is notified. The test results determine further steps.
20 or above	Heliport notifies Company. Flying is not permitted.	The Company health service, HR Department, and line manager are notified. Possible disciplinary actions.	HR Department and the line manager are notified. Possible disciplinary actions.

8.6 Urine/ blood samples

Employees may be asked to provide a urine sample for drug testing and/ or blood alcohol test (breath test) or blood sample for alcohol if they are referred for testing owing to reasonable suspicion of intoxication. The following results will be deemed a violation of this Policy for substance abuse:

- Alcohol concentration in the sample (or equivalent in urine) of 20mg/ 100ml or higher.
- Narcotics: Results are considered positive if they are at or above the level defined by a legally defensible analysis and then confirmed as positive when they have been assessed by a medical adviser. Company reserves the right to change, at its discretion and after consultation, the definition of a positive test result for any banned substance.

9. Help and rehabilitation

Company offers help to all employees who have a problem with substance abuse. Employees who admit they have a problem after they have been notified that samples will be taken for substance abuse may still, depending on the circumstances, receive a written warning. The help Company offers includes a medical assessment to determine an appropriate rehabilitation or treatment program and any financial support for the program.

Company collaborates with physicians and institutions in the public and private sectors concerning treatment of substance abuse.

In some cases, the costs of private treatment are refundable:

- The treatment and rehabilitation institution must be approved by the Company health service
- The employee must have signed a rehabilitation or AKAN agreement with Company
- Abstinence for six months following the conclusion of the treatment and rehabilitation program

Up to 50% of the cost may be refunded on application. Company may also consider financing the full cost of treatment, and then by agreement deduct 50% of the cost from the employee's salary over a 12-month period. Any financial support will be handled in accordance with current tax rules.

10. Rehabilitation agreement (known as AKAN agreement)

If an employee self-reports a problem with substance abuse as described in Section 9, Company will offer the employee an opportunity to sign an AKAN agreement as a condition of continued employment. If the employee does not wish to enter into such an agreement, the situation could constitute a basis for possible dismissal.

The Company health service is responsible for initiating the AKAN agreement and following it up. The Company doctor will undertake an evaluation with respect to the employee's offshore medical fitness certificate.

The AKAN agreement contains information about drug tests to be carried out during the agreement period. The purpose of the tests is to demonstrate that the employee is complying with the rehabilitation agreement. The agreement is entered into for a period of two years.

If there is suspicion or evidence that the agreement has been violated, Company's chief physician will always undertake an assessment of the employee's fitness for work. This includes an examination in connection with a medical fitness certificate for work offshore. If such a violation occurs, the HR representative will be contacted.

The HR representative will receive a copy of the agreement if it has been entered into as part of a disciplinary action. The HR representative and the employee's manager will be informed if the employee violates the agreement. Violation of the agreement will result in the employee being reported to the HR Department for consideration of disciplinary action, including possible termination or dismissal.

11. Duty of confidentiality and information

The Company health service has a statutory duty of confidentiality. Personal information may not be disclosed without the employee's consent. Exceptions apply pursuant to the Health Personnel Act when compelling interests make it lawful to share information, including when necessary to prevent hazardous situations or risk of serious injury. The employee's manager and HR representative shall be notified when the Company health service, in conjunction with its periodic medical examinations, identifies substance abuse that could lead to dangerous situations or serious injury. Disciplinary actions, such as withdrawal of the offshore medical certificate or a rehabilitation agreement, may be applicable.

12. Strategy for prevention and control of substance abuse problems among employees

Company has divided its substance abuse efforts into three strategic zones, outlined below:

12.1 Main strategy – Green zone

Preventing the development of drug problems through a clear drug and alcohol policy as well as targeted training and information about drugs and potential harmful effects of substance use.

Measures for implementing the main strategy may include:

- Course with follow-up at HSE&Q meetings offshore/ section meetings onshore
- Information on land directly to employees
- Information videos
- Lectures by professionals
- Awareness campaigns
- Training managers to detect substance abuse problems

12.2. Secondary strategy – Yellow zone

Helping employees who have, or are developing, a drug or alcohol problem.

Actions may include:

- Describing the options for support and help if problems occur
- Information to employee about the treatment options available to them
- Rehabilitation programs

12.3. Tertiary strategy - Red zone

Aimed at employees who have violated Company's rules on substance use and represent a threat to the working environment.

For measures refer to:

- Company's working regulations
- Company's disciplinary procedure

Employees and third parties may be refused permission to travel on behalf of Company or to be on Company's premises and may be dismissed from any Company workplace, be it temporarily or permanently. Company will make these determinations.

13. Communicating the Policy

The Policy must be communicated to all Company employees and third parties involved in Company's activities.

Department heads and managers will receive training to help them recognize symptoms of substance abuse and help them to implement the requirements of this Policy.

14. Possible difference in the Norwegian and English text.

If there is any difference between the Norwegian and English versions of this policy, the Norwegian version shall apply.