
Ryman Healthcare Drug and Alcohol Policy

Commitment

Ryman Healthcare is committed to providing and maintaining an environment which promotes the Health, Safety and Wellbeing of everyone within our Villages, Construction sites and Offices.

This includes providing a safe and healthy workplace free from the effects of alcohol and drugs.

Ryman recognises that the use of drugs and alcohol is a potential hazard in the workplace and poses a safety and health risk to everyone on site. Given the nature of our business, this can place lives at risk and potentially have an impact on families and the wider community we work and live in. This policy sets out our approach to drugs and alcohol as they relate to the workplace and how we will manage the associated risks.

Ryman promotes a culture of personal and collective responsibility towards health, safety and wellbeing.

Ryman expects that all team members and contractors, whether in a safety sensitive role or not, do not come to work impaired by drugs or alcohol. We have testing procedures aimed at eliminating the risk of alcohol and drug-related harm to team members, contractors and others involved with Ryman. We also aim to use education, rehabilitation and team member assistance programmes to achieve Ryman's stated intent where reasonably practicable to do so.

The purpose of Drug and Alcohol testing is to manage the risk of drug and alcohol use and to safeguard our team members, contractors and visitors.

Delivery on our Commitment

In order to deliver on our commitment, we will undertake the following:

- **Pre-employment and Internal transfer testing**

Team members joining Ryman in safety sensitive roles will be tested prior to joining for the presence of drugs or alcohol.

Team members transferring within Ryman to safety sensitive roles will be tested prior to transferring for the presence of drugs or alcohol.

- **Reasonable cause testing**

Reasonable cause testing will occur when there is reasonable cause to believe that a team member or contractor may be affected or impaired by drugs and/or alcohol at work.

- **Post-incident/accident testing**

Post-incident/accident testing will occur following incidents that caused serious harm or loss, or had the potential to do so.

- **Random testing**

Team members and contractors in safety sensitive roles may be randomly selected for testing for the presence of drugs or alcohol.

- **Follow up/back to work testing**

Where a team member has admitted drug or alcohol use, returned a non-negative result from testing and was not dismissed and/or subjected to disciplinary procedures for other alcohol or drug related misconduct that did not result in their dismissal, the team member may be required to undergo follow-up / back to work testing.

Scope

This policy applies to all Ryman Healthcare Ltd team members and contractors at all Ryman sites.

Objectives

The objectives of this Drug and Alcohol Policy are:

- Establishing a drug and alcohol risk-free workplace
- Ensuring that all team members are treated fairly and consistently
- Supporting effective drug and alcohol assessment and rehabilitation services where appropriate
- Educating team members and contractors about the importance of avoiding drug and alcohol-related risks
- Meeting Ryman's obligations, including:
 - a) The Health and Safety at Work Act 2015 (New Zealand)
 - b) The Human Rights Act 1993 (New Zealand)
 - c) The Privacy Act 2020 (New Zealand)
 - d) The Employment Relations Act 2000 (New Zealand)
 - e) Misuse of Drugs Act 1975 (New Zealand)
 - f) The Occupational Health and Safety Act 2004 (Victoria)
 - g) Victorian Charter of Human Rights and Responsibilities Act 2006 (Victoria)
 - h) Privacy Act 1988 (Australia)
 - i) Health Records Act 2001 (Victoria)
 - j) Drugs, Poisons and Controlled Substances Act 1981 (Victoria)
- Ensuring that all drug and alcohol testing complies with recognised international standards, including:
 - a) AS/NZS 4308:2008 "Procedures for specimen collection and the detection and quantification of drugs of abuse in urine"
 - b) AS3547-2019 "Breath alcohol testing devices for personal use"

Alcohol and Drug Support

Ryman recognises that problem drinking or drug dependency may be treatable and that the earlier the problem is recognised, the better the chance of successful rehabilitation. Ryman will consider requests by team members to participate in rehabilitation on a case by case basis and may consider whether a Health Rehabilitation Program is appropriate.

Contractors

It is a condition of entry onto Ryman sites that contractors are not affected or impaired by drugs and/or alcohol and that they agree to comply with the drug and alcohol testing requirements set out in this policy.

Testing

Testing is carried out in accordance with the relevant AS/NZS testing standards, as detailed in the Ryman Healthcare Drug and Alcohol Procedures. Ryman may review testing procedures from time to time to ensure that the all appropriate substances, including prescription medication are included in testing.

Testing will occur with the 'informed consent' of the team member or contractor concerned and as set out in the forms attached in the applicable appendix and/or the forms provided by the collector or agency.

Drug and alcohol testing will be performed at Ryman's expense (except where retesting is required as set out below) by The Drug Detection Agency (TDDA), or a similar provider, or by a nominated registered medical practitioner.

Testing will be done in such a way as to respect the individual's privacy as far as is reasonably practicable and all information gathered will be dealt with according to the requirements of the Privacy Act 2020 (NZ) and the Privacy Act 1988 (Australia).

Ryman Healthcare Drug and Alcohol Procedures

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I. Pre-Employment / Internal Transfer Drug and Alcohol Testing - Safety Sensitive roles

I.1. When applied

The offer of a position in or internal transfer to a safety sensitive role at Ryman is conditional on returning negative pre-employment drug and alcohol tests.

Any external job applicant who refuses to take a drug and alcohol test will not be considered for a safety sensitive position.

Any internal applicant who refuses to take a drug and alcohol test will not be considered for transfer to a safety sensitive position.

I.2. Procedure

- a. The preferred applicant will be informed that any job offer is conditional on a negative drug and alcohol test.
- b. The applicant will be advised that they are required to sign a consent to allow the pre-employment/internal transfer drug and alcohol test to proceed.
- c. The applicant will be directed to a qualified specimen collector and on-site screener to collect the urine and conduct an “on-site” drug screening test and breath alcohol test.
- d. Negative Test Result: The applicant must not be allowed to commence employment or transfer to the new position until a negative result has been returned.

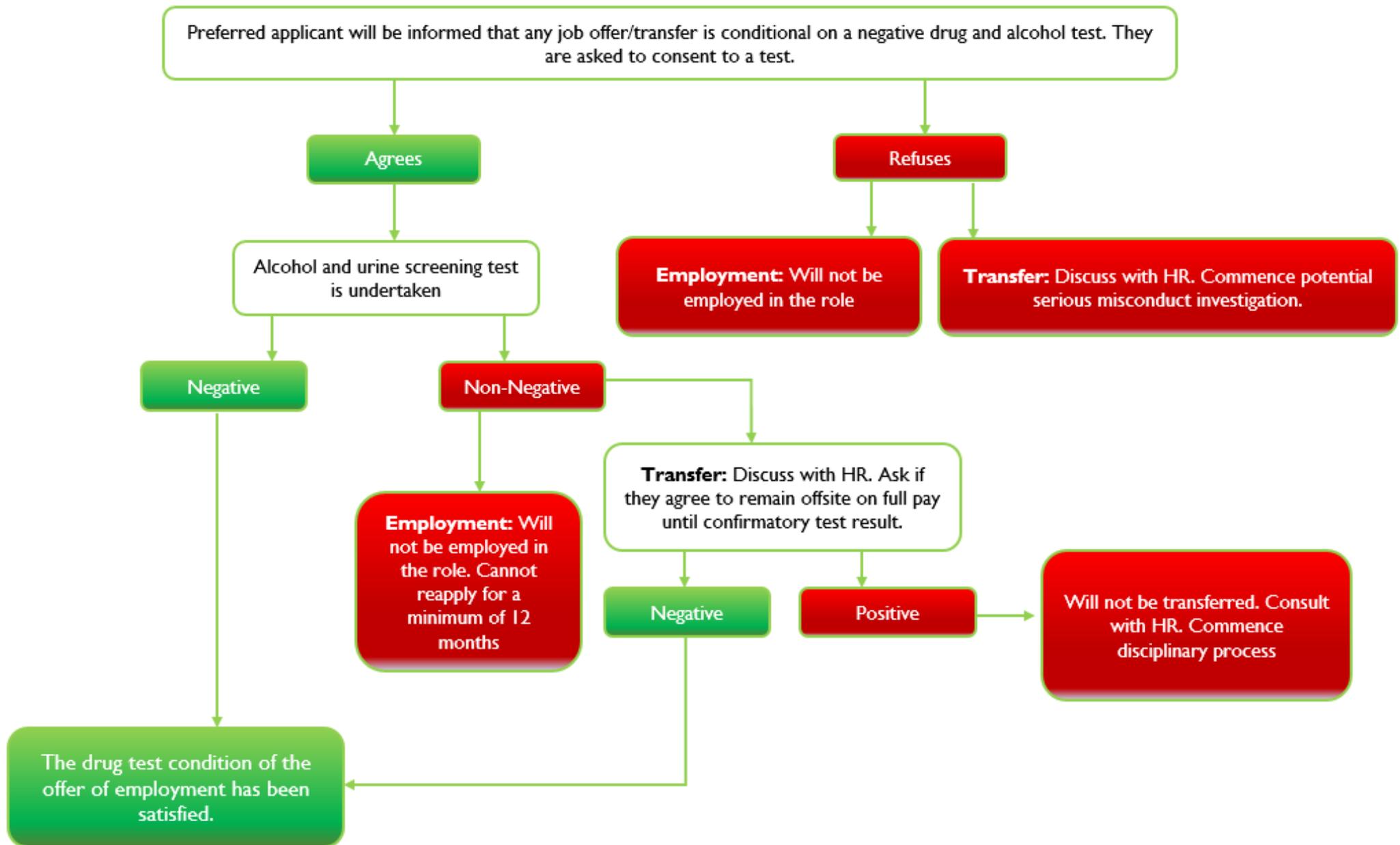
I.3. Non-negative Test Result

An external applicant refusing to undergo drug and alcohol testing or returning a non-negative drug screen test result or positive breath alcohol test result will not be offered employment at Ryman.

Internal applicants must return a negative result to be allowed to transfer to a safety-sensitive role. Any Internal applicant refusing to undergo drug and alcohol testing or returning a non-negative test result may be asked if they agree to remain off site on full pay, or suspended on full pay, until a confirmatory test result is received. Please contact HR to discuss this. The outcomes for a refused or confirmed positive drug or alcohol test are described in section 5.

Ryman will always comply with the Privacy Act 2020 (NZ) the Privacy Act 1988 (Australia) and the Health Records Act 2001 (Victoria).

Ryman Healthcare Pre-employment/Internal Transfer Drug and Alcohol Process



2. Reasonable Cause Drug and Alcohol Testing

2.1. When Applied

This procedure will apply if there is reasonable cause to believe that a team member or contractor may be affected or impaired by drugs and/or alcohol at work. Reasonable cause may include a team member or contractor's appearance, behaviour or performance at work.

Further information about reasonable cause indicators is provided in **Appendix I**.

Reasonable cause testing may also be applied when:

- a. Paraphernalia associated with drugs and/or alcohol use is found in the possession of a team member or contractor while at work, or
- b. Ryman is made aware that a team member or contractor may be working under the influence of drugs and/or alcohol or is observed using, possessing, distributing or consuming drugs or alcohol or related paraphernalia during work time (including any breaks during work time), whether on or off Ryman's premises.

2.2. Process

If reasonable cause to test for drugs and/or alcohol is determined, the following will occur:

- a. The team member/ contractor will be advised that they are required to undergo the test on the basis of reasonable cause and that the testing cannot be unreasonably delayed.
 - b. Ryman will advise the team member/ contractor of the reasons why it has reasonable cause to believe that the team member or contractor may be affected or impaired by drugs and/or alcohol at work.
 - c. The team member/ contractor will be given the opportunity to offer an explanation or make comment about the basis upon which Ryman has reasonable cause for testing. This may result in further investigation, however testing should still be undertaken before this is completed wherever practicable.
 - d. If the team member/contractor involved requires medical treatment this will be administered first.
 - e. Informed consent will be required from the team member/contractor.
 - f. From the time the decision is made to conduct the testing, the team member/contractor will always wherever reasonably practicable be accompanied and escorted to the designated approved specimen collector, "on-site" screening agent and/or breath testing provider at the earliest possible time. The accompanying person may be required to confirm the identity of the team member/contractor.
 - g. If the alcohol test and the "on-site urine screening" tests are negative, the team member/contractor may return to work.
 - h. If the urine specimen returns a "non-negative" screening result or its integrity is suspected to be compromised including by adulteration, discuss with HR. The team member may be asked if they agree to remain off site on full pay, or suspended on full pay, until the confirmed test results are available from an accredited laboratory. Contractors will be stood down until the confirmed test results are available from an
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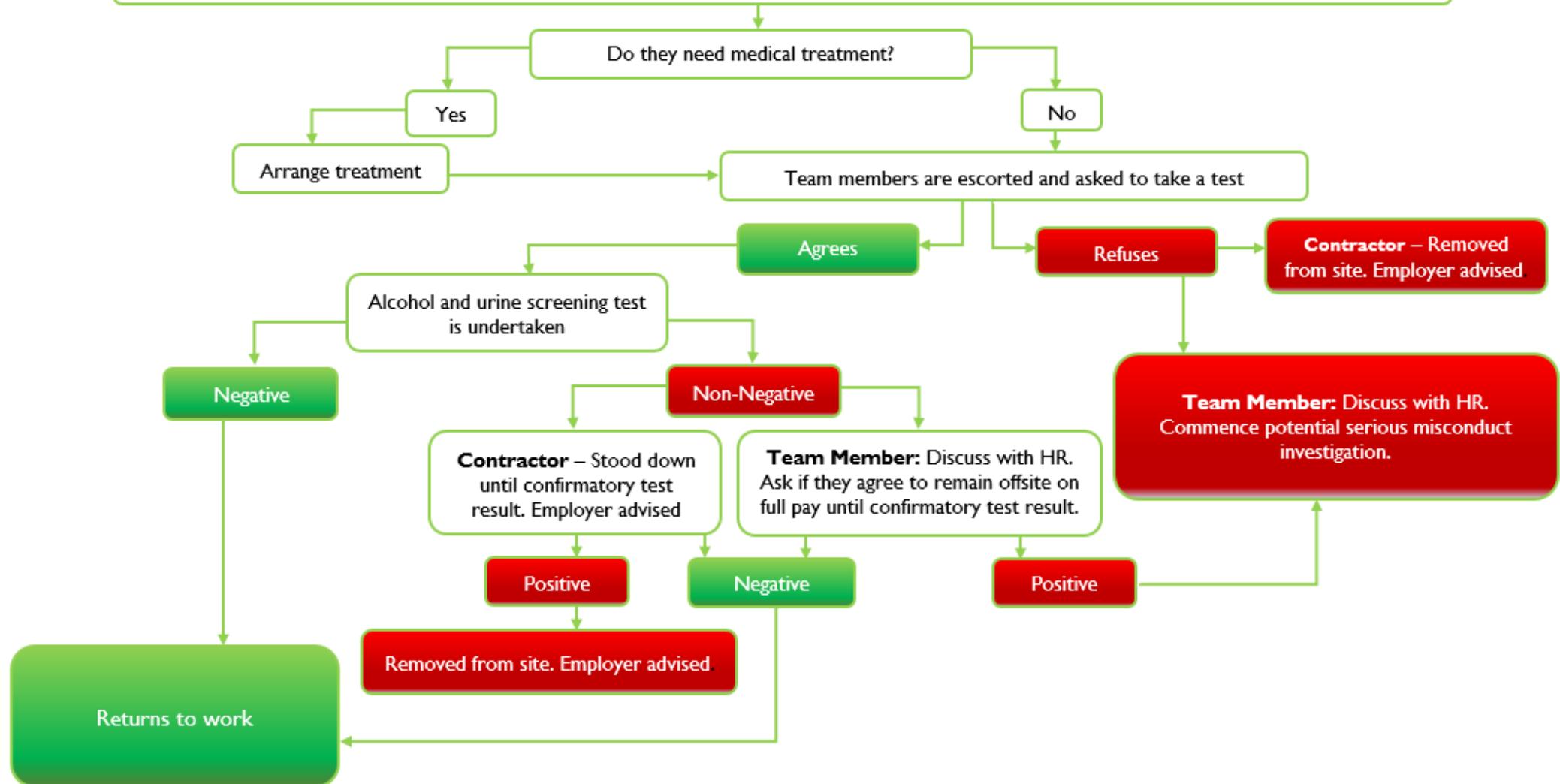
accredited laboratory and, if applicable, their employer advised. Ryman will fund the cost of the laboratory testing for contractors to confirm the result.

- i. If the confirmed test result is negative the team member/contractor may return to work.
- j. If the team member refuses a test or returns a confirmed positive drug or alcohol test Section 5 will apply.
- k. If a contractor refuses a test or returns a confirmed positive drug or alcohol test Ryman will not allow the contractor onto any Ryman site and will no longer engage permit the contractor to provide services Ryman.

Ryman Healthcare Reasonable Cause Drug and Alcohol Process

If there is reasonable cause to believe from a team member or contractor's actions, appearance, behaviours or performance that they may be affected by drug and alcohol we can advise them that they are required to undergo a test.

Team Member given the opportunity to offer an explanation or make comment about the basis upon which Ryman has just cause for testing.



3. Post-Incident Drug and Alcohol Testing

3.1. When Applied

Team members and contractors may be tested for the presence of drugs and/or alcohol where they are involved in any of the following incidents in the course of their employment or work:

- a. An incident involving death or hospitalisation;
- b. An incident or near miss that had the potential to cause serious harm or loss;
- c. An incident involving damage to a vehicle, property, plant or equipment;
- d. An incident constituting a notifiable incident, injury or illness as defined in the Health and Safety at Work Act 2015 (New Zealand) or the Occupational Health and Safety Act 2004 (Victoria).

3.2. Process

If any of the circumstances listed above are met, the following process will be followed:

- a. Drug and alcohol testing will be mandatory for all those directly involved in the accident/incident.
- b. The manager will first assess if it is practical to require an immediate test, depending on the circumstances of the incident. Refer to section 3.3 below when it is not practical to conduct a test immediately.
- c. The team member/contractor will be advised that they are required to undergo a post incident/accident drug and alcohol test and that the testing cannot be unreasonably delayed.
- d. Informed consent will be required from the team member/contractor.
- e. The team member/ contractor will be directed to a qualified specimen collector and on-site screener to collect the urine and conduct an “on-site” drug screening test and breath alcohol test.
- f. If the urine specimen returns a “non-negative” screening result or its integrity is suspected to be compromised including by adulteration, discuss with HR. The team member may be asked if they agree to remain off site on full pay, or suspended on full pay, until the confirmed test results are available from an accredited laboratory. Contractors will be stood down until the confirmed test results are available from an accredited laboratory and, if applicable, their employer advised. Ryman will fund the cost of the laboratory testing for contractors to confirm the result.
- g. If the alcohol test and the “on-site urine screening” tests are negative, the team member/ contractor may return to work.
- h. If the team member refuses a test or returns a positive drug or alcohol test Section 5 will apply.
- i. If a contractor refuses a test or returns a confirmed positive drug or alcohol test Ryman will not allow the contractor onto any Ryman site and will no longer engage the contractor to provide services Ryman.

3.3. Process for Emergency Situations

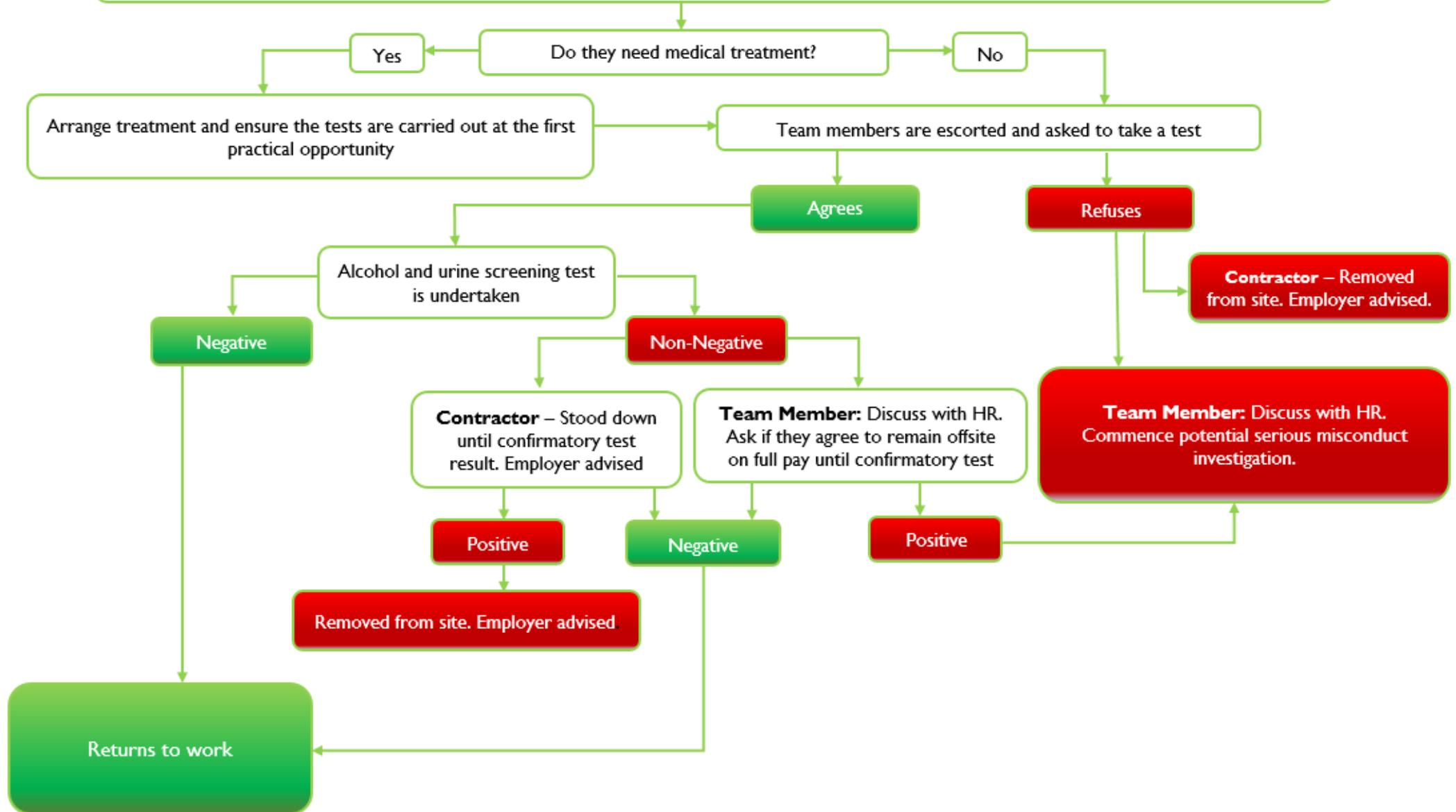
If it is not practical for a test to be carried out immediately due to injuries to a team member or where other emergency response is required, the manager will:

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- a. Attend to the immediate actions, and
 - b. Ensure that a Ryman representative accompanies the team member/ contractor to qualified specimen collector and on-site screener so the required drug and alcohol test(s) can be carried out as soon as practicable.
 - c. If the injuries preclude immediate test, ensure the tests are carried out at the first practical opportunity.
 - d. The reasons for delay will be recorded.

Testing should be undertaken as soon as possible after the incident. *(NB: If possible, the alcohol test should be conducted within 1 hour and the urine specimen collected for the drug test within 2-3 hours).*

Ryman Healthcare Post-Incident Drug and Alcohol Process

Team Member or contractor involved in Accident/Incident/Near Miss that results in, or could result in either death, hospitalisation, serious harm, damage to vehicles, property or plant and/or a constitutes a notifiable event.



4. Random Testing - Safety sensitive positions

4.1. When Applied

Un-announced random testing will be undertaken on team members and contractors who work in safety sensitive positions periodically to ensure Ryman complies with its health and safety obligations.

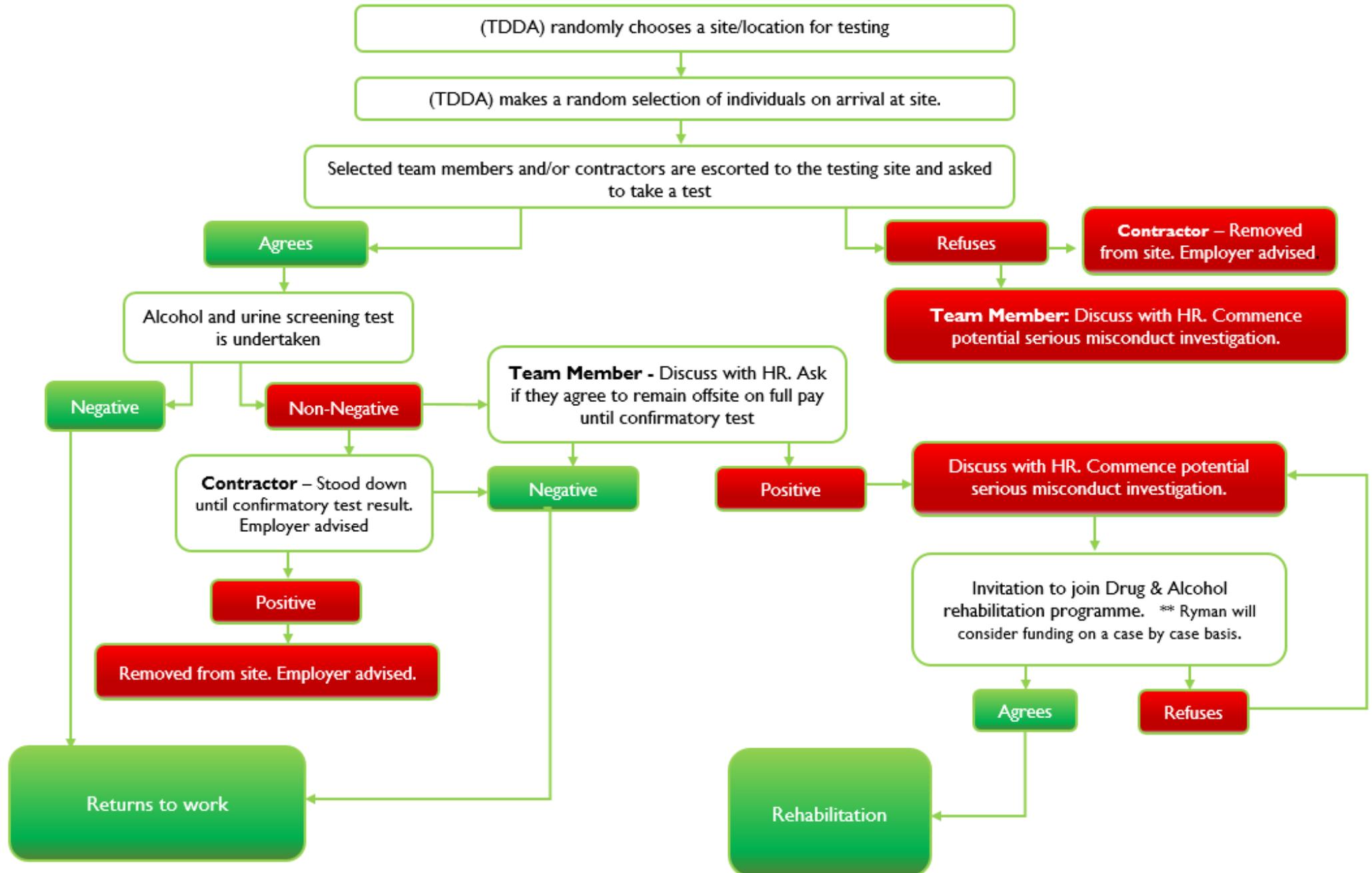
A randomly selected sample, representing a cross section of team members /contractors working in safety sensitive roles, will be notified that they are to participate in a random drug and alcohol test. This selection process will be contracted out to an external service provider (such as TDDA). Ryman will ensure that anyone who is selected for random testing is selected fairly.

4.2. Process

Where reasonably practicable, Ryman will do the following when undertaking the random testing:

- a. The team member/contractor will be advised that they are required to undergo random drug and alcohol testing and that testing cannot be unreasonably delayed.
 - b. Informed consent will be required from the team member/contractor.
 - c. From the time the decision is made to conduct the testing, the team member/contractor will always wherever reasonably practicable be accompanied and escorted to the designated approved specimen collector, “on-site” screening agent and/or breath testing provider at the earliest possible time. The accompanying person may be required to confirm the identity of the team member/contractor.
 - d. If the alcohol test and the “on site urine screening” tests are negative, the team member/contractor may return to work.
 - e. If the urine specimen returns a “non-negative” screening result or its integrity is suspected to be compromised including by adulteration, discuss with HR. The team member may be asked if they agree to remain off site on full pay, or suspended on full pay, until the confirmed test results are available from an accredited laboratory. Contractors will be stood down until the confirmed test results are available from an accredited laboratory and, if applicable, their employer advised. Ryman will fund the cost of the laboratory testing for contractors to confirm the result.
 - f. If the confirmed test result is negative, they may return to work.
 - g. If the team member refuses a test or returns a positive drug or alcohol test Section 5 will apply.
 - h. If a contractor refuses a test or returns a confirmed positive drug or alcohol test, Ryman will not allow the contractor on any Ryman site and will no longer engage the contractor to provide services for Ryman.
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Ryman Healthcare Random Drug and Alcohol Process



5. Outcomes from a Positive Drug or Alcohol Test or Refusal

Having a level of drugs or alcohol present in your system higher than the accepted international standard as defined by the Australian/New Zealand Standards, while at work and/or on business property is strictly prohibited and may result in disciplinary action or termination of employment for team members, or the termination of engagement of a contractor.

Following testing of existing team members for one of the reasons described in this policy, a non-negative drug screen result may result in the team member being asked to agree to remain off site on full pay, or suspended on full pay, until such time as a confirmatory test result is received.

Upon receipt of a positive confirmatory test result, or in the case of refusal, a potential serious misconduct investigation may commence, and Ryman may give a team member notice that any further period of suspension may be unpaid until such time as a negative drug screen result can be achieved.

A refusal to provide or recording a non-negative drug or alcohol test result may constitute serious misconduct and may result in disciplinary action up to, and including, termination of employment without notice for serious misconduct.

When investigating an allegation of serious misconduct in relation to the above, Ryman will:

- a. If proposing suspension of a team member- give them the opportunity to comment on the proposed suspension prior to making a decision to suspend the team member.
- b. Advise the team member of the allegation (e.g. refusal to undertake a test or non-negative result including the details of that result), their right to have a support person or representative and the possible outcomes of the investigation (e.g. they may face disciplinary action or their employment may be in jeopardy);
- c. Meet with the team member to seek an explanation for the refusal or the testing result and give the team member an opportunity to respond to the allegation;
- d. Consider the team member's response prior to making any decision about the outcome of the process relating to the team members employment.

Where the team member has not been dismissed following a refusal or positive result Ryman, depending on the particular circumstances:

- a. may require the team member to return a non-negative drug test before being allowed to return to work (in the event that the team member is unfit to return to work on the basis that they are unable to produce a non-negative drug test, the team member will be on unpaid leave until they are fit to return to work unless otherwise agreed by Ryman);
 - b. may offer the team member the opportunity to take normal leave or leave without pay to participate in counselling or appropriate rehabilitation;
 - c. may, at its sole discretion, help the team member in meeting the costs related to the counselling or programme;
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- d. may require the team member to be regularly monitored, for a period of up to 12 months following their return to work, including requiring random and/or follow up testing.

In certain circumstances, a failure by a team member to complete an agreed rehabilitation programme may result in disciplinary action or termination of employment.

If a contractor refuses a test or returns a confirmed positive drug or alcohol test, Ryman will ban the contractor from its sites and it will no longer engage permit the contractor to provide services for Ryman. If applicable, Ryman will advise the contractor's employer of the positive drug result and its decision to ban the contractor from its sites and no longer engage the contractor.

Test refusal includes refusing a drug or alcohol test, deliberately avoiding a drug or alcohol test, not co-operating with the testing agents, adulteration of specimens or of the drug testing process.

6. Consequences of possession or misuse of drugs or alcohol

Ryman prohibits the following:

- a. Drug or alcohol use at work.
- b. The use, transfer or possession of any drugs or drug paraphernalia or unauthorised possession or use of alcohol while at work and/or on business property (responsible and reasonable consumption of alcohol provided at business functions at the manager's discretion is excluded);
- c. Reporting to work under the influence of drugs or alcohol including reporting to work while intoxicated.

The above is considered serious misconduct which may result in disciplinary action up to and including dismissal for team members or result in Ryman banning contractors from its sites and ending their engagement as a contractor. Testing may not be required to prove a breach of the obligations above.

7. Encouragement for Self-reporting and Candour

Ryman team members are encouraged to self-report any issues or problems they are having with drugs and/or alcohol to Ryman. This should be done to either their manager or the HR team. Ryman will keep this information confidential to those individuals who have a legitimate need to know and endeavour to ensure individuals do not feel exposed, violated, inferior, judged or patronised. Where a team member self-reports such an issue or problem, Ryman may, at its sole discretion, support them in any of the following way(s):

- a. By paying for an initial assessment with a rehabilitation programme provider recognised by Ryman; and/or
- b. By facilitating and paying for an initial drug and/or alcohol test for the purposes of ensuring fitness to attend work and/or baseline testing; and/or

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- c. By offering participation in a rehabilitation programme in accordance with this policy; and/or
 - d. Providing paid or unpaid leave during the period of the rehabilitation programme.

Ryman may alter the duties of a team member or require them not to attend work following a self-report pending confirmation that levels of alcohol and/or drugs are below the thresholds set out in this policy and/or until Ryman is satisfied that the team member is fit and safe to attend work and perform their duties.

Depending on the circumstances, unprompted self-reporting may, not result in disciplinary action (or in less serious disciplinary action). This is on the proviso that the team member is deemed to be suitable for rehabilitation, where required, successfully completes a rehabilitation programme (approved by Ryman) and as part of the programme returns negative test results within a reasonable timeframe.

Any failure to meet the above requirements may, depending on the circumstances, constitute serious misconduct that could result in dismissal.

Self-reporting, and the potential protection from adverse consequences, as set out above, only relates to circumstances where the individual proactively discloses their issue to Ryman. It does not apply in circumstances where the team member:

- a. has tested positive or returned a non-negative result under this policy,
- b. has been advised that they are required to take a test under this policy,
- c. is, or has been, subject to a rehabilitation programme, or
- d. has been prompted to report in any other way.

While contractors are encouraged to self-report drug and alcohol issues, access to rehabilitation and/or leave are not available for contractors. Any rehabilitation and/or leave, which may be available for contractors will be managed by their employer.

8. Drug and Alcohol Rehabilitation including Back to Work Testing

Ryman recognises that problem drinking or drug dependency is treatable and that the earlier the problem is recognised, the better the chance of successful rehabilitation. Ryman will consider a team member's request to participate in rehabilitation on a case by case basis and may consider whether a Health Rehabilitation Programme is appropriate.

8.1. Discretionary and Voluntary

Ryman may at its sole discretion offer a team member the opportunity to voluntarily join Ryman's supported drug and alcohol rehabilitation programme.

8.2. Company referred

Team members returning a positive test or who have refused testing or admitted drug or alcohol use at work may, at Ryman's sole discretion, be invited to join Ryman's supported drug & alcohol rehabilitation programme. Depending on the circumstances, failure to take part or complete the programme may result in disciplinary action up to and including dismissal.

8.3. Funding

Where Ryman has offered a team member the opportunity to participate in rehabilitation Ryman may at its sole discretion choose to fund rehabilitation as follows:

- a. Initial assessment by a substance abuse professional.
- b. Up to 6 sessions with a drugs and alcohol substance abuse specialist.

Sessions shall be taken outside work hours or leave entitlements may be applied for and taken to attend sessions.

8.4. Process

Where Ryman has offered a team member the opportunity to participate in rehabilitation and the team member has agreed to participate, the offer will be made subject to some, or all, of the following conditions (variations are expected to occur as appropriate and as deemed necessary by Ryman):

- a. The team member must sign a contract agreeing to the programme and follow up testing.
- b. The manager will arrange an initial appointment for the team member to meet with the substance abuse specialist. Team members will be given a phone number to contact the substance abuse specialist.
- c. The substance abuse specialist may, in consultation with Ryman, arrange for treatment or further specialist advice as considered necessary.
- d. The substance abuse specialist will advise the manager if an alternative employment situation would be advisable to provide for a safe working environment. This advice may also include whether additional drug and/or alcohol testing is required during the treatment programme.
- e. Rehabilitation will commence and the rehabilitation provider will provide the manager with information on the attendance of the team member.
- f. The substance abuse specialist will report to the manager, after the agreed number of sessions, on the necessity or value of further treatment.
- g. The team member agrees to the substance abuse specialist keeping Ryman informed of the team member's progress in the programme.
- h. The team member will be required to fund any sessions required beyond those provided by Ryman.

In accordance with section 12 of this policy, the manager will treat any communications with the substance abuse specialist regarding the treatment of the team member in the strictest confidence.

8.5. Return to Work Decision

Health and safety remains paramount and a team member cannot remain at, and/or return to work, until they have returned a negative testing result at the screening stage. On advice from the rehabilitation service provider, and drug testing provider, Ryman will make a return to work decision, based upon considerations including:

- a. The nature of the team member's work.
- b. Comprehensive drug and/or alcohol assessment report from the rehabilitation service provider.
- c. Recent drug and/or alcohol test result as applicable.

Where the team member is unfit to return to work the team member will remain on unpaid leave until they are able to return a negative drug test.

8.6. Follow-Up Testing

On completion of the programme the team member will be subject to up to 6 unannounced random follow-up tests over a 12-month period. These tests may look for the presence of any amount of the drug or alcohol (i.e. it is not restricted to cut-off levels) depending on the substance for which the team member has received treatment.

Any non-negative test result following the treatment period may result in disciplinary action up to and including termination of employment without notice for serious misconduct.

Un-announced follow up testing will be undertaken periodically to ensure Ryman meets its health and safety obligations.

9. Education and Training

To achieve a drug and alcohol risk-free workplace, Ryman aims to engage with team members to support this through education and training.

Training will be incorporated into existing education and information forums along with online learning opportunities and coaching. Training and education will include:

- a. Risk and effects of drug and alcohol use.
- b. Use / misuse / abuse / dependency.
- c. The application of Ryman's Drug and Alcohol Policy.

10. Company Functions and Events

Ryman takes our host responsibilities seriously when hosting work functions and work events. All team members attending a company function are to take personal responsibility for their actions and understand they are subject to Ryman rules and policy. At some events Ryman may choose to serve alcohol however will ensure it is served responsibly and in accordance with the law. See **Schedule D**

11. Use of Prescription Medication

If a team member/ contractor takes medication, either prescribed or purchased over the counter, they have a personal responsibility to seek advice as to whether the medication has any side effects which could cause impairment for work activities.

The team member/ contractor should immediately notify Ryman of any potential impairment so that the necessary steps can be put in place to minimise any risks. These necessary steps can include temporary provision of alternate duties or the team member being asked to take paid or unpaid leave.

12. Privacy

Information gathered as a result of testing is primarily collected for the purpose of implementing this policy and achieving objectives set out in our intent and this policy. All information will be held by the appropriate manager, agency and/or others who are responsible for the team member/contractor, testing, and/or implementing the policy and any employment or health and safety related matter within Ryman, subject at all times to Ryman's right to seek professional medical or legal advice.

Ryman will hold all information gathered as a result of testing for the duration of the individual's employment or the contractor's engagement or longer as deemed necessary by Ryman, in accordance with legal requirements.

Ryman will take all reasonably practicable steps to safeguard information relating to a team member/contractor but may, as it deems appropriate and in accordance with legal requirements, disclose relevant information relating to testing of a team member/contractor and implementation of this policy to the team member's manager/supervisor, to the contractor's employer, and/or other people as appropriate prior to providing such information directly to the team member or contractor and without consultation with the team member or contractor.

Team members and contractors have the right to access and correct their personal information.

A breach of confidentiality or privacy under this policy may be regarded as a "Code of Conduct breach" and disciplinary action may result.

Schedule A Definitions

Adulteration

Deliberate use of a substance to compromise, or attempt to compromise, the integrity of a urine sample in order to attempt to “beat” the drug test: e.g. specimen dilution, using a masking agent, or providing a substitute urine specimen.

Alcohol

The term alcohol includes any beverage that contains ethyl alcohol (ethanol) including, but not limited to, beer, wine and distilled spirits.

Company

This term when referred to throughout this document means Ryman Healthcare Limited, and its subsidiaries.

Collector

A person who has successfully completed a course of instruction for specimen collection and on-site screening (if applicable), handling, storage and dispatch of specimens.

Coverage

This policy covers all team members of Ryman as well as Contractors.

Drugs

The term drugs includes any mind altering or legally controlled substance unless it is prescribed by a doctor and used in accordance with medical directions. This includes any drugs listed in the Misuse of Drugs Act 1975 (New Zealand), the Drugs, Poisons and Controlled Substances Act 1981 (Victoria) and any drugs listed in the **AS/NZS 4308:2008: Procedures for specimen collection and quantitation of drugs of abuse in urine**. Ryman may also include drugs other than those listed in the policy, such as those drugs referred to as “designer drugs”, including (but not limited to) synthetic cannabinoids and herbal highs, as well as other synthetic drugs such as opioids, hallucinogens, piperazines, stimulants and sedatives in the definition of “drugs”.

Manager

This term includes Managers/Supervisors and/or any person(s) in control of a workplace with authorisation of Ryman.

Procedures for Drug testing (see Schedule C)

Procedures adopted when testing for drugs normally including urine specimens being taken by an approved and certified specimen collecting and on-site screening agency and screened using an on-site screening device verified in accordance with AS/NZS 4308:2008 standards (or any

updated version) or at an accredited screening laboratory. Dilution and other sample integrity tests are also normally undertaken. Any specimen giving either a “non-negative” screen for a drug class or an indication that the integrity is compromised will be forwarded to an accredited testing laboratory for confirmatory testing in compliance with AS/NZS 4308:2008 (or any updated version).

Procedures for Alcohol testing (see Schedule C)

Procedures used for testing for alcohol usually being breath alcohol tests conducted using an approved testing device which meets the Australian Standard: AS 3547/2019 “Breath Alcohol Testing devices for Personal use” (or any updated version). The threshold levels will be set to an effective ‘zero tolerance level’, i.e. 100 µg/L for all team members.

Reasonable Cause / Post-incident

These terms refer to any situation, incident or accident in which alcohol and/or drugs may be implicated, which includes but is not limited to suspicious behaviour, appearance, conduct or actions and/or those indicators outlined in **Appendix I**.

Refusal

A team member who refuses to submit to a drug and/or alcohol test may be subject to disciplinary procedures that may result in disciplinary action up to and including summary dismissal. A refusal includes:

- a) Refusing to undergo testing or to provide informed consent without good reason;
- b) Failing to report for, reporting late or leaving early for an appointment with the collector or agency undertaking testing without reasonable cause and/or failing to report same to the relevant manager or company;
- c) Being unable for whatever reason to provide sufficient breath or urine to be tested without a valid medical explanation; and/or
- d) Tampering with or adulteration of the specimen or procedures.

Safety Sensitive

All positions at Ryman construction sites are deemed safety-sensitive due to the nature of the work conducted, the equipment used, and the hazards present. Other positions may be considered safety sensitive, for example if periodically visiting high-risk workplaces or undertaking high-risk tasks such as driving as part of their work.

Team Member

Includes any person employed by Ryman.

TDDA

The Drug Detection Agency – commercial drug testing business in New Zealand and Australia.

Schedule B Procedures for Managing the Testing Process

The manager must:

- a. From the time of notification, arrange for the team member/contractor to always be accompanied and escorted to the drug and alcohol testing provider.
- b. Ensure that the team member/contractor has identification to present to the collector.
- c. Obtain written consent from the team member for drug and alcohol testing.
- d. When the team member/contractor arrives at the collecting site, the collector shall request identification. If the individual's identity cannot be established unequivocally, then the collector shall not proceed with the collection.
- e. If the alcohol test is negative, urine is collected for the drug test.
- f. If the alcohol test is positive, the urine drug screen is conducted and the team member or contractor is removed from site until a disciplinary investigation is undertaken.
- g. If the urine specimen returns a "non-negative" screening result or its integrity is suspect it is dispatched to the laboratory for confirmation testing. The team member is removed from site on pay until the confirmed results are received from the laboratory. Contractors are removed from site until confirmed test results are available from an accredited laboratory and their employer advised. Ryman will fund the cost of the laboratory testing for contractors to confirm the result.
- h. If the integrity of the initial specimen is suspicious the team member or contractor shall stay at the collection site and be supervised at all times until they can provide a second urine specimen (to be collected within 3 hours). Both the original and second specimens will also be forwarded to the laboratory for both drug and specimen integrity testing. The original and further specimens shall be uniquely labelled and accompanied by their individual chain-of-custody forms, which will be cross-referenced.

Schedule C Procedures for Drug and Alcohol Testing

Drug Testing Procedure

The drug testing procedure is as follows:

- Ryman has elected to use urine testing and the testing processes will comply as far as is reasonably practicable with the combined Australian and New Zealand Standard AS/NZS 4308:2008 (or successor Standards) as applicable, which the team member or contractor (Donor) may request to see and read at any time. Ryman may, at its discretion, use other testing methods provide that they comply with the applicable Australian and New Zealand Standard.
- Where testing procedures are not followed in their entirety Ryman reserves the right to rely on results where any change does not significantly impact on the reliability of results and/or overall fairness of the process to the Donor.
- All aspects of the testing procedure for drugs will be carried out in a confidential and private manner as far as is reasonably practicable.
- The methods and standards relating to the collection, transportation and chain of custody of samples for drugs testing purposes may vary, however, Ryman will endeavour to meet the requirements of applicable standards, which include but are not limited to the: AS/NZS 4308 and any future amendments.
- The Donor's informed consent will be sought prior to testing which is indicated by the team member signing a consent form as outlined in the schedules and/or any forms used by the agency or facility undertaking testing.
- Before taking the test, the Donor should advise the Collector of any medication they are currently taking that they think might affect the results.
- The Collector may carry out an on-site test to exclude or identify the presence of any or all classes of drugs designated in AS/NZS 4308:2008 (or any updated version).
- After washing hands, the Donor remains in the presence of the Collector and does not have access to any water fountain, tap, soap dispenser, cleaning agent or any other materials that might be used to compromise the integrity of the urine specimen.
- No device should be placed into the original collected urine unless it can be shown that the device does not contaminate the specimen.
- The results obtained from the device shall be interpreted in accordance with the manufacturer's instructions.
- If the initial drug screen is negative the Donor will be notified and that will be the end of the drug testing process.
- If the on-site device indicates the possible presence of a drug(s), the Collector shall notify the Donor of the initial screening result and prepare and dispatch the specimens to an accredited laboratory for confirmation.
- A drugs testing custody and control form should be completed on which the Donor will be asked to read, sign and date the chain-of-custody statement certifying the specimen is that individual's and has not been changed or altered at the time of the collection.

-
- Both samples will be dispatched to the designated testing laboratory.
 - A positive test will only be reported by the AS/NZS 4308:2008 (or successor Standard) accredited laboratory if confirmed levels of drug or metabolite exceed designated cut-off levels. Cut-off levels will conform to the relevant Australian Standard/New Zealand Standard, where such a standard has been issued in relation to the drug concerned.
 - If the Donor disagrees with an initial positive test result then they have the option of having the second sample (the B sample) independently retested at another AS/NZS 4308:2008 (or successor Standard) accredited laboratory.
 - The cost of the second test will be met by the Donor but if the result is negative Ryman will refund any costs incurred by the Donor. Due to possible degradation of samples over time, re-testing need only detect the presence of the drug or metabolite. For the second test to be positive there need only be the presence of drug or metabolite detected (i.e. need not be above cut off limits). This will be accepted as a conclusive result.
 - Specimens not submitted to the laboratory shall be disposed of in accordance with waste disposal requirements and appropriate legislation.

Alcohol Testing Procedure

The alcohol testing procedure is as follows:

- If Ryman elects to test the team member's or contractor's levels of alcohol using breath, the testing will be conducted using an approved testing device which meets as far as is reasonably practicable, the Australian Standard: AS 3547/2019 "Breath Alcohol Testing Devices for Personal Use" (or successor Standard). This requires the team member (Donor) to blow into the device using a disposable mouthpiece.
- Where testing procedures are not followed in their entirety Ryman reserves the right to rely on results where any change does not significantly impact on the reliability of results and/or overall fairness of the process to the Donor.
- If the first reading is recorded **less than 100 micrograms** of alcohol per litre of breath the result is deemed negative and the individual may return to full duties.
- If the reading is recorded **over 100 micrograms** of alcohol per litre of breath the result is deemed to be "Detectable".
- Following a "Detectable" test, a confirmatory test on the same device is performed after 15 minutes using a new mouthpiece.
- If the confirmatory result is recorded **less than 100 micrograms** of alcohol per litre of breath the result is deemed negative and the individual may return to full duties.
- If the confirmatory result is recorded **over 100 micrograms** of alcohol per litre of breath, the test is deemed to be a "Positive Breath Alcohol Test".

Schedule D Safe Hosting Guidelines

Purpose

Ryman takes the health and safety of team members, contractors and visitors seriously and seeks to provide clear guidance on responsible hosting where alcohol is served.

Ryman supports the responsible consumption of alcohol at company related functions and events. The alcohol limits prescribed in Ryman policies or the NZTA/Victorian drink driving limits are applied dependent on the circumstances.

Approval

Ryman will, in certain approved circumstances, allow team members and contractors to consume alcohol in moderation. Approved circumstances are:

- At any Ryman team or organisational function where alcohol consumption is approved in advance;
- At approved “work drinks” held on Ryman sites.

Ryman arranged functions and events, and regular “work drinks” will be held in accordance with the appropriate policies. Drinking to the point of intoxication is prohibited and team members and contractors remain responsible for their behaviour and conduct at such events. Reporting to and/or performing work with breath alcohol levels over the alcohol threshold in this policy is prohibited.

Safe Hosting Guidelines

Managers are responsible for managing the use and availability of alcohol at all Company functions and events involving their team members and when their team members are representing Ryman. The guidelines below should be applied for all functions and events where alcohol will be served:

- A designated Company representative with responsibility for the function should always be at the function. If that person leaves, they must delegate responsibility to another appropriate person.
- A designated area and clear time limits should be stipulated and adhered to.
- Food and non-alcoholic drinks should be provided.
- Ryman should not provide spirits (other than wine).
- Careful consideration must be given to alternative transportation arrangements.
- Inappropriate and anti-social behaviour should be managed in the same way as if the incident occurred in the ordinary workplace.
- Managers should consider that their approach to alcohol at Company functions and events plays a key role in setting an example of what is acceptable to team members.

It is recognised that alcohol may be stored at Ryman workplaces, for example in giving or receiving gifts, resident use and team member functions. Storage of alcohol on site is permitted but should be kept to a minimum and under the control of the Manager.

Schedule E - AS/NZ 4308:2008 Drug Cut Off Levels

IMMUNOASSAY INITIAL TEST CUT OFF LEVELS:

Drug Category	Initial cut-off Level
Amphetamine	300 ug/ L
Benzodiazepines	200 ug/ L
Cocaine metabolites	300 ug/ L
Cannabis metabolites	50 ug/ L
Methamphetamine	300 ug/ L
Opiates	300 ug/ L

CONFIRMATORY TEST CUT-OFF CONCENTRATIONS

Compound	Cut-off level (micrograms/litre)
Morphine	300
Codeine	300
6-Acetylmorphine	10
Amphetamine	150
Methylamphetamine	150
Methylenedioxyamphetamine	150
Methylenedioxyamphetamine	150
Benzylpiperazine*	500
Ephedrine*	500
Phentermine *	500
Pseudoephedrine*	500
11-nor- Δ^9 - tetrahydrocannabinol-9- carboxylic acid	15
Benzoyllecgonine	150
Ecgonine methyl ester	150
Oxazepam	200
Temazepam	200
Diazepam	200
Nordiazepam	200
α -hydroxy-alprazolam	100
7-amino-clonazepam	100
7-amino-flunitrazepam	100
7-amino-nitrazepam	100

* These drugs may be optionally tested within each class and the specified cut-off levels shall apply.

Schedule F - Responsibilities

1. Ryman and Senior Executive Team

Ryman and its Senior Executive Team are responsible for the implementation of this policy and that all team members and contractors (and their employers) have access to a copy of this policy and the AS/NZS 4308:2008 testing standard. Ryman will ensure relevant managers undergo appropriate training where reasonably practicable.

2. Senior Leadership Team and Regional Managers

The Senior Leadership Team and Regional Managers are responsible for the effective implementation of the policy in all the areas under their direct control and for ensuring that it is applied consistently to all individuals.

3. All Leaders

All leaders are responsible for the day-to-day health, safety and welfare of all individuals under their direct control and for ensuring that every team member is fit to commence, and remain at, their allocated work. They are responsible for taking appropriate action to ensure safety whenever they believe an individual is not capable of working in a safe manner or where drug or alcohol use is suspected.

4. All Team Members and Contractors

All team members and contractors must:

Come to work in a condition in which they can carry out their duties without risk to themselves or others. This includes ensuring that they meet the requirements of the policy and are not in an unfit state for any reason, including the adverse effects of alcohol or other drugs.

Notify their manager if they are a team member or the person responsible for the site if they are a contractor of any concerns they may have regarding the fitness or otherwise of any other team member or contractor whose performance may be impaired due to being under the influence of drugs or alcohol.

Cooperate with their manager if they are a team member and Ryman in effectively implementing this policy including complying with all the requirements.

Advise their manager if they are a team member or the person responsible for the site if they are a contractor of any prescription or non-prescription legal drugs (medication) that may impact on their ability to perform the duties of their role safely and/or effectively.

Accurately describe their work to any medical practitioner prescribing and/or providing medication for the team member or contractor, so the practitioner can give sound advice on any risks from medication in relation to their work.

5. Human Resources Team

The HR team are responsible for supporting the application of this policy and providing support to leaders and team members in relation to Drugs and Alcohol.

APPENDIX I – REASONABLE CAUSE INDICATORS

Examples of symptoms or behaviour that may give Ryman just cause to require the team member / contractor to undergo testing include, but are not limited to:

- excessive lateness
- absences often on Monday, Friday or in conjunction with holidays
- emotional signs – outbursts, anger, aggression
- changes in personality
- changes in alertness – difficulty with attention span
- changes in appearance – clothing, hair, personal hygiene
- less energy
- involvement in various minor accidents
- feigning sickness or emergencies to get out of work early
- going to the bathroom more than normal
- defensive when confronted about behaviour
- dizziness
- slurred speech
- hangovers
- violent behaviour
- impaired motor skills
- bloodshot eyes
- impaired or reduced short term memory
- reduced ability to perform tasks requiring concentration and co-ordination
- intense anxiety or panic attacks
- impairments in learning and memory, perception and judgement
- irritability
- depression

Reasonable cause testing may also take place where Ryman learns, from a credible source, that the team member/ contractor may be working under the influence of drugs and/or alcohol, or where the team member/ contractor is reported as having been observed using, possessing, distributing or consuming drugs, alcohol or any associated utensils or equipment, during work time or during any breaks, or while on Company business or presenting Ryman in any way, whether on or off Ryman premises.

APPENDIX 2 – ALCOHOL TEST CONSENT FORM

Consent for Breath Alcohol Testing

I consent to undergo a breath alcohol test, which I acknowledge is for the purpose of determining whether:

I have a level of alcohol in my breath higher than 100 µg/L.

Results of the breath alcohol test will only be used for the purposes for which it was obtained, as set out in Ryman Drug and Alcohol Policy.

I understand that a positive alcohol test under the terms of this contract means having an alcohol level in my system higher than that detailed above.

I understand that a positive test result may result in any offer of employment not being made or automatically withdrawn and/or lead to disciplinary action, which may include dismissal or the requirement to take part in a Rehabilitation Programme.

I understand that a refusal to sign this form and undergo a breath alcohol test may be regarded as a serious offence and may result in any offer of employment not being made or automatically withdrawn and/or disciplinary action, which may include dismissal.

I hereby authorise the collection of a breath sample for Alcohol Testing, and the release of the test results to an authorised representative of Ryman.

I have read and understood the terms of this consent form and have been advised of my right to seek advice and representation and a reasonable opportunity to do so.

Signature of Applicant _____ **Date** _____

Applicant's Name _____

Witnesses Name and Signature _____

Test administered at _____

On _____ **(time)** _____ **(date)** _____

By _____ **(name)**

First Reading _____ **Result – negative / positive** (circle the one that applies)

Second Reading _____ **Result – negative / positive** (circle the one that applies)

(Second test occurs 15 minutes first test if positive)

APPENDIX 3 – DRUG TEST CONSENT FORM

I consent to undergo a drug test, to be undertaken by a certified collecting agent and accredited laboratory appointed by Ryman which I acknowledge is for the purpose of determining whether I have levels of an illicit or restricted drug(s) or a misused prescribed drug(s) present.

I understand that a urine sample (or other sample as appropriate) will be collected and the drugs being tested for are cannabinoids, opiates, amphetamine type substances (including party pills containing benzylpiperazine), cocaine, benzodiazepines, and others if applicable.

I undertake to advise the certified collector of any medication that I am taking. I also agree to provide the collecting agent with proof of identity, which includes my photograph.

I consent to the results of the drug test(s) being communicated confidentially to Ryman.

I understand that I may request a second test be conducted on the duplicate specimen and analysed within 14 days of receiving the result. For the second test to be positive there need only be the presence of drug or metabolite detected (i.e. not cut off limits). This will be accepted as a conclusive result and costs associated with this test will be borne by me. If the second test proves negative this will be accepted as a conclusive result and costs associated with this test will be reimbursed by Ryman.

Any collection, storage or exchange of information concerning the drug test will be in accordance with the requirements of the Privacy Act and results will only be used for the purposes for which they were obtained.

I understand that a refusal of any kind, or the return of a non-negative/positive result means that:

- pre-employment/ internal transfer:** the job offered/ applied for will not be offered to me and/or will be withdrawn
- current employee:** Ryman disciplinary procedure may follow which may include dismissal or the requirement to take part in a Rehabilitation Programme.
- contractor:** I will be stood down and my employer advised.

I have read and understood the terms of this consent form and have been advised of my right to seek advice and representation and a reasonable opportunity to do so.

I hereby authorise the collection of a specimen, the release of the specimen to the testing facility, and the release of the test results to the Medical Advisor and the authorised representative of Ryman.

Signature of Applicant _____ **Date** _____

Applicant's Name _____

Witnesses Signature _____ **Date** _____

Witnesses Name _____

APPENDIX 4 – DRUG & ALCOHOL REHABILITATION CONTRACT

Ryman and team member _____ agree and acknowledge that the team member has admitted drug or alcohol use and/or a positive test result has been returned regarding:

Drugs Alcohol (specify with a tick)

As a result of this the parties commit to the following:

- 1. Ryman is committed to a drug and alcohol-free workplace.
- 2. The team member acknowledges responsibility for proactively demonstrating a commitment to a drug and alcohol-free workplace by submitting to testing and/or where applicable, attending an approved Rehabilitation Program, professional counselling and/or other support such as:
 - a) OCP (Organisational Counselling Programmes) 0800 377 990 (NZ)
1800 273 865 (Aus)
 - b) Alcoholics Anonymous 0800 229 6757 (NZ)
1300 222 222 (Aus)
 - c) Alcohol Helpline 0800 787 797 (NZ)
 - d) Alcohol and Drug Foundation 1300 858 584 (Aus)
- 3. The team member gives consent for an initial benchmark test to be completed as soon as reasonably practicable and periodic follow up screening tests, to be conducted at Ryman’s discretion for a 12-month period following the signing of this agreement, and that these tests should be negative and/or at least reflect a significant downward trend when compared with the benchmark test, if applicable.

Drug Alcohol (specify with a tick)

- 4. The team member authorises any applicable service provider to release the following information to Ryman (where applicable):
 - a) The details, results and any other information regarding testing.
 - b) Whether the team member has kept appointments regarding treatment.
 - c) Whether the team member is following the requirements of any treatments and any other recommendations by the service provider.
 - d) Whether the service provider has recommended any other course of treatment.
 - e) Whether the team member has completed the treatments.

-
5. The team member agrees to receive any treatments from a service provider outside work hours and/or apply for and use leave entitlements if required to participate during work hours.

 6. The team member acknowledges that they have agreed that their continued employment with Ryman is subject to full participation in the testing regime and/or treatment provided by the service provider(s) specified by the employer including attending all sessions and completing the requirements specified by the service provider.

 7. The team member agrees that any of the following could constitute serious misconduct which may lead to disciplinary action up to and including summary dismissal:
 - a) They do not attend or complete the required treatments;
 - b) On any future occasion, including during the treatment period and/or within the 24 months following the signing of this agreement, or any tests during any other time, the team member returns a non-negative drug/alcohol test; and/or
 - c) The team member refuses to take any tests, returns a non-negative test and/or the testing results fail to at least reflect a significant downward trend when compared with the benchmark test, if applicable;

 8. The team member acknowledges that they have been told that they should seek and receive independent advice on this agreement and have had a reasonable opportunity to seek such advice.

 9. The team member accepts the terms of this agreement, which they acknowledge may be in addition to the terms of their current individual employment agreement and agree to be bound by both agreements.

.....Team member

.....Manager

.....Witness

..... Date