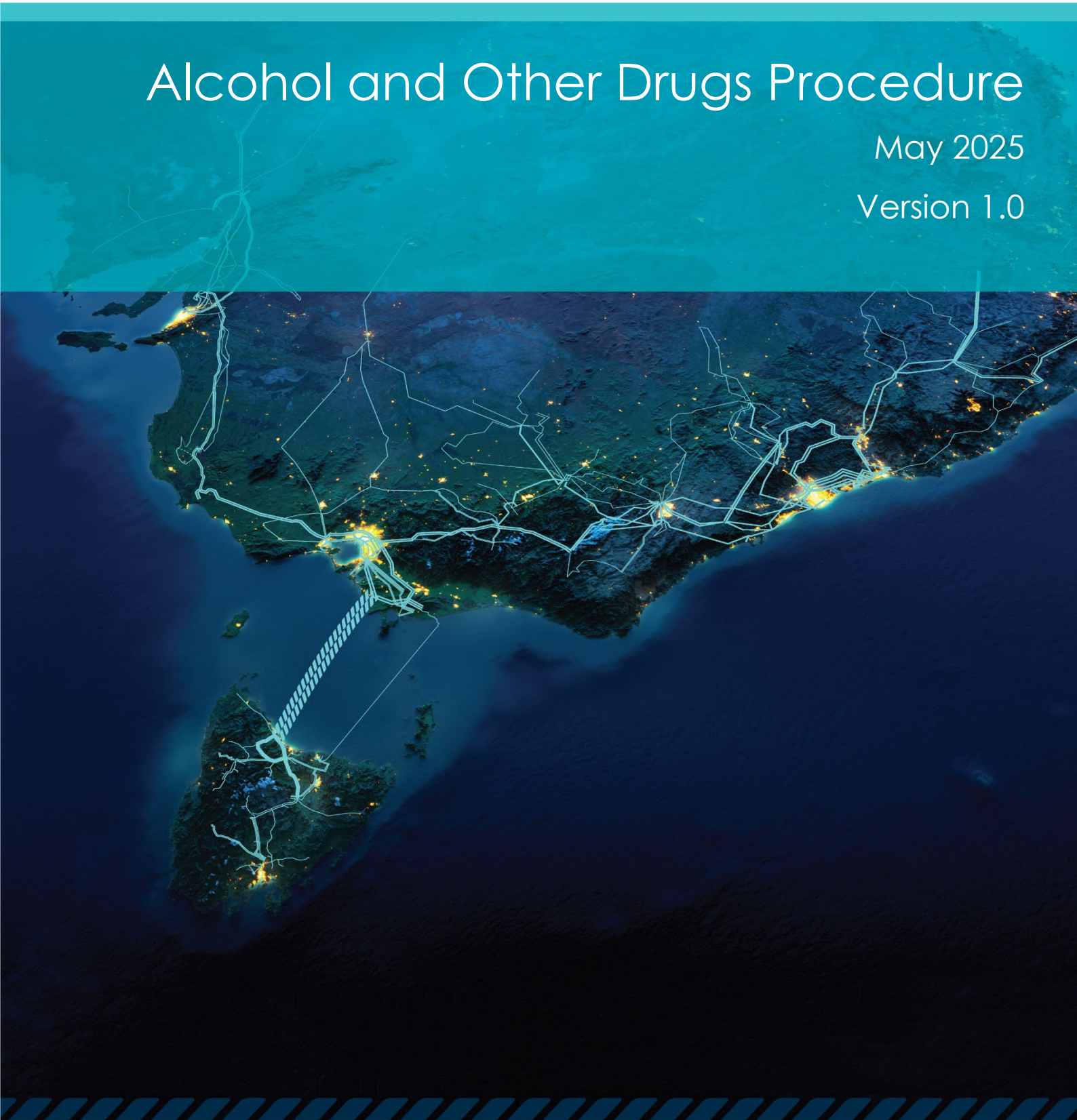




Alcohol and Other Drugs Procedure

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1 Introduction

1.1 Context

Occupational health and safety issues arise if a worker is impaired by the effects of drugs and alcohol, including poor decision-making, risk taking, coordination, motor control, concentration and alertness. Drugs include not only illegal substances, but also prescription drugs used either incorrectly or as prescribed, where their side effects may affect performance. Workers who are impaired by the impacts of drugs and alcohol present a risk to themselves, other workers and the community in which they operate. It is essential that procedures and processes are in place to ensure risks are effectively managed.

1.2 Purpose

The purpose of this Alcohol and Other Drugs Procedure is to describe how MLPL seeks to eliminate, so far as is reasonably practicable, the risks to health and safety arising from a worker presenting in the workplace under the influence of either alcohol or drugs. Where MLPL cannot entirely eliminate such occurrences, MLPL shall control the risks through the application of this document.

This procedure sets out the obligations of MLPL employees, partners, representatives, suppliers or contractors, with respect to the management of alcohol and drug use. It specifies the actions which may be taken by MLPL if there is a breach of those obligations, including:

- a requirement for a worker to notify their manager if the worker suspects:
 - she/he is impaired by alcohol or any other drug; or
 - that another worker is impaired by alcohol or any other drug;
- the provision of education and rehabilitation measures for workers, including provision for information about referral to counselling, treatment and rehabilitation services where appropriate;
- the provision of information to workers about their responsibilities and obligations in relation to alcohol and other drug use;
- the provision of information to workers with respect to the effect of alcohol and other drugs and the possible disciplinary action and other penalties that may apply if a worker fails to comply with this Alcohol and Other Drugs Procedure;
- appeals and grievance mechanisms for dealing with complaints about the application of disciplinary action and other penalties, or the implementation of this Alcohol and Other Drugs Procedure; and
- protocols for fair procedures relating to the application of this Alcohol and Other Drugs Procedure.

MLPL's Alcohol and Other Drugs Procedure should be read together with the:

- Code of Conduct;
- Issues and Complaints Resolution Procedure; and
- MLPL's Privacy Policy.

1.3 Alignment with AS/ISO Standards

This Alcohol and Other Drugs Procedure is built upon AS/NZ Standards 4308:2023 Procedures for specimen collection and the detection and quantification of drugs in urine and 4760:2019 Amd 1:2020 - Procedure for specimen collection and the detection and quantification of drugs in oral fluid.

2 Who does this Alcohol and Other Drugs Procedure Apply To?

This procedure applies to our employees, contractors and service providers whilst engaged in activities undertaken as part of their work with MLPL.

The consumption of alcohol at work related events is permitted with CEO approval.

Where a contractor's Alcohol and Other Drugs Procedure meets or exceeds the requirements of this procedure, then upon the written consent of MLPL, that contractor may apply its own procedure.

3 Key elements of this Alcohol and Other Drugs Procedure

MLPL's Alcohol and Other Drugs Procedure stipulates that:

- a pre-employment, random, post-incident, return to work and targeted drugs and alcohol testing program will be implemented;
- a worker must have a zero-alcohol (0.00) level when attending for work and whilst at work;
- a worker must not have any detectable non-prescription drugs in their system when attending and while at work;
- workers must acknowledge that if they consume any alcohol or drugs outside of work, this may result in them attending or performing work with alcohol or drugs in their system. In such cases, it is their responsibility to ensure that they do not attend or perform work with drugs or alcohol in their system;

- workers must declare to their manager, if medication they're taking (prescription and/or non-prescription) has the potential to affect their ability to work safely. The manager shall, with the support of the Safety and/or People teams, seek to arrange alternate working arrangements. Compliance with the MLPL Privacy Policy must be maintained for all sensitive medical information;
- workers are not permitted to possess or sell alcohol or drugs in the workplace; and
- workers must not be in possession of any item or piece of equipment for the use or administration of an illicit drug at any MLPL workplace.

4 MLPL's Alcohol and Other Drugs Procedure

4.1 Definitions

For the purpose of this procedure, the following definitions shall apply.

TERM	DEFINITION
Prescribed Concentration of Alcohol (PCA)	Means any concentration of alcohol in the blood.
Worker	Employees, contractors and service providers whilst engaged in office and field activities undertaken as part of their work with MLPL.
Accredited Tester	A person accredited under the relevant Australian Standard to perform either, or both, a blood alcohol level test or a saliva test for the presence of drugs or a register medical practitioner.
Trained Person	A person who has successfully completed 'HLTPAT005 Collect specimens for drugs of abuse' testing within the past 2 years.

4.2 Impairment

No worker shall attend for, or be permitted to commence work, at an MLPL worksite with a blood alcohol level exceeding the prescribed limit of zero (0.00), with the exception of an approved work event, or have within their blood stream an illicit substance.

No worker shall consume alcohol (with the exception of an approved work event) or an illicit drug whilst on an MLPL worksite or where required to travel to or from an MLPL worksite during the worker's shift.

MLPL requires a worker to notify their manager if the worker is aware, or has good reason to suspect, their ability to carry out their work may be impaired by alcohol or any other drug, or the worker is aware, or has good reason to suspect, another worker may be impaired by alcohol or any other drug.

MLPL may issue a verbal instruction to a worker, requiring that worker to undergo a drug and/or alcohol test, where a manager and representative from the Safety or People teams suspects a worker may be impaired by a drug or alcohol, or suspects that worker has consumed an illicit drug or alcohol during their shift or whilst in attendance at an MLPL worksite.

4.3 Work Related Events/Functions

From time-to-time MLPL may host events both in the workplace or at a venue where alcohol is served to attendees. These events must be controlled and have the following mitigations in place to prevent the risk of intoxication:

- a nominated function lead that is present for the duration of the function to oversee the distribution of alcohol and ensure that persons under the age of 18 years are not served alcohol;
- alcohol not being served to individuals showing signs of intoxication;
- low-alcohol content beverages and non-alcoholic beverages being available;
- food being available; and
- appropriate transport arrangements being available for any participant who is not fit to drive.

Work related events must be approved by the CEO using the authorised function request form showing in Appendix A.

Additionally, workers who attend functions hosted by third parties, where alcohol is being served, have a responsibility whilst representing the company. It is the responsibility of the worker attending the event to behave in accordance with the MLPL Code of Conduct and limit the consumption of alcohol.

Workers attending such events must not return to MLPL offices or worksites, if they have consumed alcohol.

Attendance, and the potential early finish, must be approved by the worker's manager.

4.4 Testing

The following types of tests are anticipated within this procedure.

4.4.1 Pre-employment Testing

All persons seeking to be engaged by MLPL in a field-based role, shall undergo a pre-employment drug and alcohol screening. Where a positive result is observed, the prospective employee shall be referred to MLPL's medical practitioner who shall report and advise MLPL of their findings and recommendations.

4.4.2 Self-Testing

At each contractor worksite self-breath testing facilities shall be available, so any worker can access in private prior to entering the worksite. The responsibility rests with the worker to ensure they enter any worksite free of alcohol or illicit drugs. No records shall be kept of the results of these pre-start self-tests.

4.4.3 'For Cause' Testing

Where a person has reasonable grounds to suspect a worker may be impaired by either drugs or alcohol, the manager of the suspected impaired worker, following consultation with a Safety team and/or People team representative, may require a worker to submit to a breath test or to a saliva test as appropriate.

The worker suspected of being impaired by drugs or alcohol must provide a breath and saliva sample for a preliminary test undertaken by trained personnel before they commence or continue work. If the test is positive the worker will be referred for a confirmatory test. Confirmatory drug testing must be undertaken by an Accredited Tester whilst the confirmatory breath test is undertaken by a Trained Person.

4.4.4 Random Testing

At any time, MLPL may require a worker who is at its workplace to submit to a random test for the presence in their body of either, or both, alcohol and drugs. Participants of random testing must provide a breath and saliva sample for a preliminary test undertaken by trained personnel. If the test is positive the worker will be referred for a confirmatory test. Confirmatory drug testing must be undertaken by an Accredited Tester whilst the confirmatory breath test is undertaken by a Trained Person.

4.4.5 Post Incident Testing

Personnel involved in an incident involving the operation of plant and equipment, including motor vehicles, or an incident with the potential to result in a fatality must provide a breath and saliva sample for a preliminary test undertaken by trained personnel. If the test is positive the worker will be referred for a confirmatory test.

Confirmatory drug testing must be undertaken by an Accredited Tester whilst the confirmatory breath test is undertaken by a Trained Person.

4.5 Positive Drugs and/or Alcohol Test Result

Where a positive (i.e. non-negative) result arises following either a preliminary Random, For Cause or Post Incident test, the worker shall cease work immediately and be transferred by their supervisor or Safety team member to an Accredited Tester as soon as possible. Where the worker is a contractor, the worker's manager must be informed, and the contracting employer must make any required arrangements for the confirmatory testing of the worker. To assist in the assessment of impairment refer to Appendix B.

Where the confirmatory test is negative the worker shall return to work immediately.

Where a confirmatory test is positive, the worker will not be permitted to return to the workplace. MLPL must ensure their means of transport from the workplace is not in breach of any legislative provision, such as leaving by driving a motor vehicle whilst under the influence of a drug or whilst being more than the prescribed blood alcohol content (**BAC**) level applicable to that worker's extant licence provisions.

Any consequences for a positive confirmatory test shall be determined by MLPL's People and Culture Director and applied in a consistent and just manner according to MLPL's Code of Conduct.

4.6 Refusal to Submit to a Drugs and/or Alcohol Test

Where a worker refuses to submit to a demand for drug and/or alcohol testing, to either a preliminary or confirmatory test, that worker shall be required to cease any further work at an MLPL site. Where the worker is an MLPL employee, the matter shall be referred to MLPL's People and Culture Team. Where the worker is an employee of a contractor, the worker's manager shall be informed and appropriate disciplinary action taken.

The worker must provide a negative sample before being considered to be permitted to return to the workplace.

Any consequences for refusing a test shall be determined by MLPL's People and Culture Director and applied in a consistent and just manner according to MLPL's Code of Conduct.

4.7 Appeals and Grievance

A grievance is a formal complaint made by an employee about an issue that they believe affects their rights or well-being at work and follows a step-by-step approach to resolving the issue.

MLPL uses formal processes to address disputes, concerns or disagreements between employees and the company. The process allows workers to challenge decisions or actions they believe to be unfair, unjust or to violate their rights.

Should a worker feel aggrieved as to the outcome of a drugs and/or alcohol test they may, in accordance with MLPL's Issues and Complaints Resolution Procedure, file an grievance with MLPL's People and Culture team. The grievance shall be processed in accordance with the aforementioned [Issues and Complaints Resolution Procedure](#).

4.8 Education and Rehabilitation

Education and rehabilitation for drug and alcohol use are crucial for helping individuals recover from addiction and avoid relapse. They involve a range of approaches including prevention, treatment and long-term recovery strategies.

Education aims to raise awareness about the risks of drug and alcohol use as well as provide knowledge on how to make healthy life choices. Education emphasises the negative impacts of substance use on physical health and mental well-being.

Rehabilitation is a process aimed at helping individuals recover from addiction through a combination of therapeutic and supportive interventions.

Education and rehabilitation for drug and alcohol abuse is to empower individuals to understand the risks and consequences of substance use, develop healthier coping strategies for stress and emotional challenges, and rebuild their lives in recovery.

MLPL utilises the services of its Employee Assistance Provider (**EAP**), Access Psych, for education and rehabilitation measures for workers. Access Psych can be contacted on **1800 APSYCH (1800 277 924)** or through MLPL's Intranet The Link: [Employee Assistance Program \(EAP\) for Marinus Link - Access Psych](#).

5 Need to know more or have a question?

All MLPL employees will have access to this Alcohol and Other Drugs Procedure and associated documents and registers on MLPL's document management system (The Link). Support and further information is available from your manager, the Safety team, People and Culture team or the Governance and Compliance team.

6 Administration of this Alcohol and Other Drugs Procedure

This Alcohol and Other Drugs Procedure is administered by Governance and Compliance and will be reviewed and approved every two years or updated where applicable.

Authorisations		
Action	Name	Date
Prepared by	Safety Science, Consultant	6/03/2025
Reviewed by	Brendon Johnson, Head of Safety	9/05/2025
Approved by	Mark Stephens, Business of Operations Director	28/05/2025

Document control				
Date	Version	Description	Author	Approved by
28/05/2025	1.0	Approved	Safety Science	Business of Operations Director

Appendix A - Function Approval Request

To (MLPL CEO),

Please authorise the following function:

Reason:

Location:

Start time: Finish time:

Function leader:

As function leader, I understand that I must:

- be present for the duration of the function;
- oversee the distribution of alcohol and ensure that persons under the age of 18 years are not served alcohol;
- ensure that alcohol is not served to individuals showing signs of intoxication;
- ensure low-alcohol content beverages and non-alcoholic beverages are available;
- ensure food is available;
- arrange transport for any participant who is not fit to drive;
- ensure that any remaining alcohol is secured appropriately at the end of the function; and
- not spend more than the approved spend limit - \$
- Other controls

Name:

Role:

Signed:

Date:

I (MLPL CEO), do/do not authorise this function in accordance with the above conditions.

Signed:

Date:

Appendix B – Assessing the Effects of Alcohol and Drugs Guidance

Signs of impairment may include, but are not limited to:

- | | |
|--|---|
| <input type="checkbox"/> work performance and work patterns | <input type="checkbox"/> refusing to comply with worksite conditions, refusal to be tested by customers or authorities. |
| <input type="checkbox"/> high number of mistakes | |
| <input type="checkbox"/> extremes in performance | |
| <input type="checkbox"/> difficulty in remembering instructions or handling complex situations | |

Physical symptoms or conditions:

- | | |
|--|--|
| <input type="checkbox"/> weariness | <input type="checkbox"/> wearing sunglasses at unusual times |
| <input type="checkbox"/> exhaustion | <input type="checkbox"/> slurring of words |
| <input type="checkbox"/> excessive blinking | <input type="checkbox"/> smelling of alcohol |
| <input type="checkbox"/> blank stares | <input type="checkbox"/> unable to stand up straight without assistance. |
| <input type="checkbox"/> unusual efforts to cover arms | |

Absenteeism and personal health:

- | | |
|---|--|
| <input type="checkbox"/> increase in absence especially before and after weekends | <input type="checkbox"/> disappearing from job regularly |
| <input type="checkbox"/> consistently late | <input type="checkbox"/> signs of nervousness or emotional distress. |

Social interaction on the job:

- | | |
|--|--|
| <input type="checkbox"/> withdrawing or avoiding peers | <input type="checkbox"/> unusual outbursts of emotion e.g. being angry or irritable. |
| <input type="checkbox"/> overly sociable | |

Accidents and concentration:

- | | |
|--|--|
| <input type="checkbox"/> highly accident prone on and off the job | <input type="checkbox"/> difficulty concentrating |
| <input type="checkbox"/> taking unnecessary risks or needlessly endangering others | <input type="checkbox"/> appearing to be confused. |

Tick relevant observations above. Observations must be verified and signed off by the manager and a representative of the Safety or the People teams

Observed by:

Manager:

Name: Date:

People or Safety team representative:

Name: Date: