

Alcohol & Drug Practice (USA)

As stated in Ovintiv's Alcohol & Drug Policy, the company is committed to protecting the health and safety of all individuals affected by our activities, as well as the communities in which we live and operate. The company recognizes that the use of alcohol and drugs can adversely affect job performance, the work environment and the safety of our employees, contractors, service providers and the general public.

This Alcohol & Drug Practice is comprised of the following sections:

- Accountability.
- Consumption of alcohol and use of drugs.
- Prevention and intervention.
- Violations.
- Testing.
- Searches.

Accountability

Accountability for prevention of and response to inappropriate consumption of alcohol and use of drugs is shared across all levels and areas of the company.

Environment, Health & Safety (EH&S)

- Oversee and affect changes to the Alcohol & Drug Policy and Practice, including legislation and regulation updates.
- Coordinate and, where appropriate, conduct incident investigations on behalf of the company or in conjunction with security.
- Perform duties of the designated employer representative (DER), which include receiving alcohol and drug test results, updating testing pools, and liaising with the medical review officer (MRO), third party administrators, and collection sites.
- Notify human resources of fitness-for-work issues.
- Participate in the review and auditing of contractor/service provider alcohol and drug programs for compliance with the company's policies and practices.
- Support and participate in development of alcohol and drug awareness training.

Security

- Support compliance with the Alcohol & Drug Policy and Practice at company sites.
- Manage reasonable grounds searches on company property and worksites.
- Conduct investigations on behalf of the company.

Human Resources

- Support the Alcohol & Drug Policy and Practice within the company.
- Assist the business with identifying safety-sensitive positions.
- Consult with and provide guidance to supervisors on the selection and application of disciplinary actions.
- Communicate to individuals offered safety-sensitive positions, including United States Department of Transportation (DOT) positions, the associated medical requirements (including

pre-employment testing) prior to the start date.

- Communicate employee status changes (i.e., new hires, transfers, terminations) to EH&S, as needed.

Health and Disability

- Oversee treatment, return-to-work programs, and liaise with substance abuse professional (SAP).
- Offer Employee and Family Assistance Program (EFAP) and SAP services to employees who seek assistance with alcohol or drug problems.
- Assist managers with the mandatory employee referral process, if applicable.
- Liaise with EH&S on work-related injuries, as appropriate.
- Manage the post-treatment and return-to-work alcohol and drug testing.
- Support the business in determining employee fitness-for-work and employee compliance with treatment recommendations.
- Assist in the selection and management of the MRO.
- Support and participate in drug and alcohol awareness training.

Employee and Family Assistance Program

- Coordinate confidential assessment, counseling, and treatment guidance to employees who voluntarily request help with substance abuse issues, as provide through the EFAP.
- At the direction of health and disability provide fitness-for-work assessments for employees referred to EFAP for treatment, including consultation with a SAP.

Substance Abuse Professional

- Complete a substance abuse assessment on employees referred by health and disability.
- Provide assessment findings and fitness-for-work recommendations to health and disability.
- Recommend treatment and post-treatment care, including frequency and duration of follow-up testing to health and disability.
- Monitor employee compliance with treatment recommendations and provide feedback regarding ongoing fitness-for-work.

Legal Services

- Advise the company on applicable laws and the interpretation, implementation, and defense of the Alcohol & Drug Policy and Practice.
- Monitor legal issues, cases and decisions that might impact the company's policy and practices.
- Participate in determining the appropriateness of testing and searches.
- Provide guidance in the development and delivery of employee education materials.
- Consult with and provide guidance to human resources and supervisors on the selection and application of disciplinary actions.

Supervisors

- Provide guidance and direction to employees who request assistance for issues covered under the Alcohol & Drug Policy and Practice, including referrals to appropriate resources (i.e., EFAP, health and disability).
- Maintain confidentiality of affected employees, as required under these practices and Ovintiv's Privacy Policy.
- In consultation with human resources, EH&S, and/or legal services, investigate situations where

there are reasonable grounds to believe there has been a violation of the Alcohol & Drug Policy and Practice.

- Partner with human resources and/or legal services to execute decisions relating to employees under their supervision who have been determined to be unfit for duty.
- Arrange for testing in a timely manner when post-incident or reasonable grounds testing is required on a company employee.
- Monitor contractor/service provider compliance and report violations of the Alcohol & Drug Policy and Practice, including reasonable suspicion, to EH&S.
- Participate in training regarding their responsibilities under this practice, and if applicable, DOT regulations, which include substance abuse awareness and reasonable suspicion testing.

Employees

- Read, understand and comply with Ovintiv's Alcohol & Drug Policy and Practice.
- Be fit for work:
 - Upon arrival at the worksite.
 - Throughout the workday or shift.
 - When on a scheduled call or any time you are driving a company vehicle.
 - When assisting emergency response efforts.
- Report situations immediately to your supervisor, or EH&S where there are reasonable grounds to believe another employee, contractor, or service provider is not fit for work.
- Be aware of resources available and take responsibility for resolving personal substance abuse concerns.
- Comply with EFAP/SAP findings, including recommended alcohol and drug treatment programs.
- Report motor vehicle infractions related to impaired driving (and driver's license suspensions of any nature), if driving is a condition of employment.
- Report any conviction on a criminal drug-related offense to their supervisor within 24 hours of ruling.
- Cooperate with any investigation into a possible violation of the Alcohol & Drug Policy and Practice.
- Decline emergency call/unscheduled calls if under the influence of alcohol, drugs, or medication that may impair your fitness-for-work.

Contractors and Service Providers

- Adopt and enforce an alcohol and drug policy/practice consistent with the company's policy/practices and contractor/service provider expectations.
- Provide proof of alcohol and drug policy/practice upon request by the company.
- Cooperate with audits of the policy/practice as required.

Consumption of Alcohol and Use of Drugs

Regardless of when they are used, alcohol and drugs have the potential to impact an individual's performance. Inappropriate alcohol consumption or drug use by employees or contractors/service providers has the potential to adversely impact human health and safety as well as company business and operations.

Fitness-for-Work

All employees must arrive and remain fit for work while conducting company business, on company

premises and when on scheduled call. Fit for work means being able to perform work duties in a safe, efficient, productive manner with no drugs or alcohol present in the body at or above the acceptable limits.

To maintain fitness-for-work, all employees while conducting company business, on company premises and when on scheduled call, are prohibited from:

- Using or possessing drug paraphernalia or drugs that are illegal.
- Using mood- or mind-altering substances (i.e., any natural or synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption) or other hallucinogens such as “bath salts”.
- Using prescription medications that are not prescribed to them or were obtained without proper medical authorization.
- Inappropriate use of any prescription or non-prescription medication that could cause impairment.
- Having a blood alcohol concentration (BAC) above the acceptable limit (see Positive Tests section).

Safety-Sensitive Positions

Employees in safety-sensitive positions:

- Are prohibited from consuming any product containing alcohol during their regular work hours, during meals or breaks, and when on a scheduled call.
- Shall not report for duty or remain on duty when using any prescription or over-the-counter (OTC) drug that will adversely affect the employee’s ability to safely perform their work duties.
- Must consult with a licensed medical practitioner to determine fitness to perform work duties in a safe manner while under the effects of a prescription or OTC drug.
- Are required to advise their supervisor and/or health and disability of medication use that may alter their fitness-for-work.
- Are required to pass a drug test as a condition of pre-assignment.

United States Department of Transportation Positions

Employees in Department of Transportation positions:

- Are safety-sensitive and, in addition to being covered by this practice, are also subject to DOT testing regulations and the company’s DOT Anti-Drug Plan and Alcohol Misuse Prevention Plan.
- Are subject to DOT Plan documents and requirements in cases of conflict between this practice and the requirements specified by the DOT.
- Must have a negative DOT drug test result (in addition to any company required non-DOT test) as a condition of pre-assignment or prior to a transfer from a non-DOT position to a DOT position.

Employees in non-safety-sensitive positions:

- Are required to ensure their consumption of alcohol and use of legal prescriptions and non-prescription items during the workday is responsible, does not affect their ability to perform their work, and remain fit for work.
- Are prohibited from operating a vehicle while on Ovintiv business if impaired by the consumption of alcohol or use of drugs.

- Are required to pass pre-assignment, reasonable cause, post-incident, pre-access, return-to-work and post-treatment drug and alcohol testing when deemed appropriate.

Business Travel

Provided fitness-for-work standards are maintained and safety-sensitive requirements are met, bearing in mind the intent of this practice, employees are permitted to:

- Responsibly consume alcohol when on company business away from the worksite (e.g., conference attendance).
- Responsibly consume alcohol on corporate and charter aircraft.
- Carry sealed containers of alcohol in the trunk of a personal vehicle when traveling on company business unless specifically prohibited at the location (i.e., worker accommodation sites) or by federal, state, or local laws.

Social Events

To ensure responsible alcohol consumption at company-wide and other organized social events, event coordinators must implement reasonable measures as described under Ovintiv's Event and Special Occasions Guidelines.

The consumption, possession, distribution, offering or sale of alcoholic beverages at company-wide social events and organized internal group or team events must be pre-approved by the appropriate vice-president of the operating area (OA) or functional group hosting the event.

Medications

Employees are expected to use prescribed and non-prescribed medications responsibly. In the case of prescription medications, the prescription must be legally prescribed, in the employee's name, and taken at the correct dosage.

In addition, employees:

- Should consult with their licensed medical practitioner or pharmacist to determine if use of a medication (or combination of medications, including OTC items and herbal remedies) could have a negative impact on work performance and take appropriate steps to minimize associated risks.
- Will advise their supervisor and/or health and disability of medication use that may alter their fitness-for-work.

Health and disability and/or the company physician may consult, on a confidential basis, with the employee and their treating physician (with the employee's consent) regarding the nature and duration of any potential work modification. The health and disability representative will advise the worker's supervisor of any required modifications to job duties, maintaining confidentiality of medical information obtained about the employee.

Medication Categories

The medication categories listed below have been associated with performance impairment and are provided as a guideline to employees in assessing their own medication use. The list is not exhaustive. There are numerous other prescription and non-prescription drugs that can impact

performance. In addition, some medications used in combination with alcohol or certain food/herbal items, may cause performance impairment.

- Anti-depressants – used to treat depression (e.g., Celexa, Prozac, Zoloft).
- Antihistamines – widely prescribed for hayfever and other allergies (e.g., Chlor-Triplon) and found in many cold medications.
- Motion sickness drugs – used to prevent motion sickness and nausea (e.g., Dramamine, Antivert).
- Barbiturates – used as sedatives, hypnotics, tranquilizers, anti-depressants, anti-convulsants (e.g., Phenobarbital, Valium, Halcion, Librium, Elavil, Anafranil, Dilantin). Some of these ingredients are also found in medications taken for digestive and other disorders.
- Narcotics – used to treat pain, suppress cough, alleviate diarrhea and induce anesthesia (e.g., Demerol, OxyContin, Morphine, Percocet, Codeine). Codeine is often found in combination drugs such as Tylenol 1, 2, 3's, as well as cough medications.
- Stimulants – medication used for central nervous system stimulation and for appetite suppression (e.g., amphetamines or medications sold as “diet pills”).
- Analgesics – used to treat pain and inflammation (e.g., Darvon, Indocid).
- Cold tablets/cough mixtures – used to treat cold symptoms (e.g., Sinutab, Contac, Triaminic, Tussionex and preparations containing dextromethorphan or codeine).
- Muscle relaxants – used to treat muscle cramps (e.g., Flexeril, Robaxial).

Marijuana – Medical and/or Recreational

Although some states allow for the use of medical marijuana as well as recreational marijuana, it remains illegal under federal law. Thus, even those states that allow some marijuana use generally do not require an employer to accommodate or allow an employee's use of marijuana in the workplace. Notwithstanding a specific state statute that provides otherwise, even if an individual possesses a medical marijuana prescription, a positive test for marijuana will be grounds for withdrawal of an offer of employment and for disciplinary action up to and including termination of employment.

Prevention and Intervention

Ovintiv believes that prevention is the best choice for minimizing the potential for health impacts and incidents resulting from inappropriate alcohol consumption and drug use. A key element of prevention is early identification of potential alcohol and drug problems, followed by appropriate treatment. The company provides support to employees who pursue help with personal alcohol and drug concerns. In cases where employees choose not to request help on their own and where there are reasonable grounds to believe the individual's work performance is negatively affected by inappropriate alcohol or drug use, the company will intervene in accordance with its Alcohol & Drug Policy and Practice.

Voluntary Assessment and Treatment

Employees who are concerned that they may have a problem or could be developing a problem with alcohol or drugs are encouraged to:

- Contact the company's EFAP, their personal physician, an appropriate community service, or health and disability.
- Follow appropriate treatment before work performance is affected.

Employees who voluntarily pursue assistance with alcohol or drug problems or participate in a counseling or treatment program will not be disciplined, provided they pursue assistance before:

- Being notified that they must report for alcohol or drug testing.
- The company intervenes on reasonable grounds.
- There is any adverse impact on their job performance.

Accessing assistance or declaring a problem does not eliminate the requirement for satisfactory performance. In addition, work modifications and aftercare programs cannot be avoided by a request for counseling or treatment, or by disclosure that the employee is already involved in a treatment program.

Work Modifications

Where a qualified professional (i.e., MRO, SAP, personal physician) advises health and disability that an employee's consumption of alcohol or use of drugs may be preventing the employee from doing their job safely, a medical work modification may be issued, and the employee may be assigned to alternate duties or removed from the workplace.

Short-Term Disability

Employees under active medical care and who are unable to work due to attendance at a recognized treatment program may qualify for short-term disability benefits. Employees must comply with Ovintiv's Absence Reporting Practice as well as prescribed treatment programs, which may include counseling and other assessments or programs as necessary to maintain eligibility for short-term disability benefits.

Aftercare

All employees who complete company-referred treatment programs for substance abuse will be required to participate in an aftercare program when returning to duty. Employees returning to work will be advised of the conditions governing their return-to-work and the consequences for failing to meet those conditions. This will be outlined in a return-to-work agreement.

Confidentiality

Except where limited disclosure is necessary for program administration or due to potential health and safety concerns, appropriate information will be disclosed only on a "need-to-know" basis. Information directly relevant to the level of functionality, including fitness for duty and any restrictions that may apply, will be shared as required for purposes of determining appropriate work accommodation and/or work re-entry. Medical information will be handled in compliance with all applicable legislation.

Violations

If an employee violates the provisions of this practice, disciplinary action may be taken up to and including termination of employment.

Continued Employment

In situations where the company elects to continue employment after a violation, the employee involved may be required to enter into a written agreement outlining requirements for their continued

employment. These requirements may include but are not limited to:

- Temporary removal from their position or assigned alternative duties.
- Assessment by a SAP to determine the need for a treatment program following a treatment/aftercare program.
- A negative return-to-duty test.
- Unannounced, follow-up drug and/or alcohol testing, complying with all requirements of the Alcohol & Drug Policy and Practices and, if applicable, DOT regulations.
- Not allowed to work on Ovintiv's partners' sites where a zero-tolerance policy exists.

Impaired Driving Charges

All employees required to operate a motor vehicle on behalf of the company must:

- Maintain a valid driver's license as a condition of employment.
- Report to their supervisor any of the following incidents within 24-hours of the occurrence:
 - Impaired driving charge obtained while operating a company vehicle.
 - Impaired driving charge obtained while operating a non-company vehicle while on company business.
 - Temporary loss of license as a result of any impaired driving charge, loss of license or restrictions on a license due to an impaired driving conviction.

Where holding a valid driver's license is a condition of employment, loss of the license may result in the employee no longer being qualified for the position held and loss of employment.

Testing

Except as otherwise stated, prohibited substance testing will be conducted using collection, documentation, Custody and Control Forms (CCFs), and testing methods consistent with Substance Abuse and Mental Health Services Administration (SAMSHA) standards, when practical. Hair testing methodology may be used for pre-assignment testing and for other testing. Unless otherwise stated in an applicable substance abuse policy, testing will include the same substances and testing cut-off levels as specified by the DOT and/or Department of Health and Human Services (DHHS). However, Ovintiv reserves the right to change the substances for which it tests and/or cut-off levels, as warranted by relevant consideration, including the prevalence of prohibited drugs and technical evolution in testing methods.

The company will conduct applicant and employee testing as required by federal or state law including, where applicable, testing required by any government agency. In addition to testing mandated by law and as allowed by law, in accordance with this practice, the company may conduct the following types of testing, but is not limited to:

Pre-Assignment Testing

All applicants who receive conditional employment offers must submit to pre-assignment drug testing. Applicants who test positive on a pre-assignment drug test will not be eligible for the position. This includes both initial employment with the company and employee transfers from non-DOT to DOT positions. In addition, a refusal to participate in the testing process will automatically disqualify the applicant from further consideration for the position.

Drug testing is independent of any medical assessment. Upon receiving an offer of employment, the applicant must arrange an appointment for testing as soon as possible (as instructed on the offer letter), but no sooner than 45 days prior to the established start date or if DOT, no sooner than 30 days.

Reasonable Suspicion Testing

Reasonable suspicion testing may take place as part of an investigation whenever the company determines that an individual's actions, appearance or conduct while at work provide reasonable cause to suspect the inappropriate consumption of alcohol or use of drugs. For DOT employees, two supervisors or safety representatives, one of whom has received the mandatory training on the signs and symptoms of drug and alcohol abuse should substantiate and concur in the decision to test an employee. This can be accomplished by phone or by having one of the supervisors or EH&S representatives travel to the job site, if only one supervisor is at that particular job site. For non-DOT employees, the concurrence of two supervisors or EH&S representatives is suggested, but not required.

In cases of suspected illegal substance use or abuse by a service provider's personnel, Ovintiv personnel should contact the service provider's supervisor or EH&S representative and request that the service provider handle the matter in accordance with the service provider's policy.

Referral of an individual for testing will be based on specific, objective observations and articulable facts such as:

- Consumption or evidence of consumption of alcohol.
- Use or evidence of drugs or drug paraphernalia.
- Changes in job performance.
- Changed, erratic or atypical behavior.
- Changes in physical appearance.
- Changes in speech patterns.

The employee will be escorted to and from the testing facility and may be temporarily removed from his or her position pending the company's receipt of test results.

Post-Incident Testing

Post-incident testing may be conducted as part of an investigation into a significant incident, near hit, or work-related incident as defined in the Ovintiv Incident Reporting and Investigation Matrix. Individuals will be tested after it has been determined by the supervisor and EH&S investigating the incident that the individual's actions contributed to or could have contributed to the chain of acts or omissions leading up to the event. Incidents involving employees driving vehicles used for company business are also subject to post-incident testing.

Post-incident tests are conducted as follows:

- Alcohol tests should be conducted immediately and within two hours of an incident, if possible, but cannot be conducted if more than eight hours have passed since the incident occurred.
- Drug tests should be conducted as soon as possible and within 32 hours of an incident.
- Individuals to be tested are not allowed to consume alcohol or use drugs, except prescribed

medications according to the prescription, until after the test has been completed, or until they are advised a test is not required.

- Whenever possible, the employee will be escorted to and from the testing facility.
- Mobile collection services may be used, if appropriate (e.g., remote location).

Unannounced Random Testing

Unannounced testing of individuals in DOT-covered positions will be conducted in accordance with DOT regulations (i.e., employees must report immediately to the collection facility) once they are notified.

Unannounced testing of individuals in safety-sensitive, non-DOT positions will also occur under this practice. Selected employees must be notified of the test while they are actively working (e.g., not on vacation, disability, etc.) and must report to the collection facility on the day of notice. Once tested, an employee's name is returned to the random testing pool. Unannounced test selections will be computer-generated in a way that ensures that each employee in the testing pool has an equal chance of being selected. These selections will be administered by the designated employee representative or a qualified independent third-party administrator.

Post-Violation Return-to-Work (Post-Treatment) Testing

Upon return to work after a violation of the Alcohol Drug Policy or Practice, the employee must have a negative return-to-work test follow-up testing.

Follow-up testing:

An employee returning to work post-treatment may be required to undergo further follow-up testing as part of their aftercare program.

Additionally, the employee may be subject to unannounced follow-up/aftercare testing for a period to be determined by the SAP in consultation with health and disability on a case-by-case basis. Any subsequent positive test may result in termination.

Employees who are in occupations regulated by federal agencies will, at a minimum, be subject to the procedures mandated by those regulations. To the extent they supplement and do not conflict with these regulations, the company's practices will also be followed in order to establish a comprehensive substance abuse program.

Administrative Responsibilities

EH&S is responsible for overseeing Ovintiv's alcohol and drug testing programs, including the selection and engagement of service providers. OAs cannot contract independently for testing services (e.g., collection, laboratory analysis, and medical review of results) without input and agreement from EH&S.

All test results are reported directly to the company testing administrator or designate. Except for the release of information in accordance with this practice and in situations affecting the health and safety of workers or where the public could potentially be affected, results of all testing will be maintained by the company testing administrator and will be kept confidential.

Refusal to Test

Employees will be allowed reasonable travel time to report for testing after being notified that a test is required. All of the following are considered a refusal and grounds for termination of employment:

- Failure to report or attempts to delay reporting for a test.
- Failure to remain until the process is complete.
- Failure to provide an adequate specimen (without a medical reason).
- Refusal to permit direct observation, if required.
- Failure to submit to re-collection or re-testing, if required.
- Submission of a specimen that the MRO verifies has been adulterated.
- Failure to cooperate with any part of the testing process, including signing of forms.

Testing Methods and Chain of Custody Protocols

Alcohol tests should be administered by a calibrated breath-testing device with a printout of test results. If a breath-testing device is not available and the test is not federally regulated (i.e., DOT), an alternative collection method (i.e., saliva) may be used.

Tests for drugs, if DOT, must follow specific regulations (i.e., currently done by urinalysis); all other testing under this practice may be administered by hair, urinalysis, or other alternative collection method. Regardless of the type of test or method, chain of custody protocols must be followed to ensure samples are collected and handled in a manner that allows for accurate analysis. Although the forms may vary in appearance, chain of custody protocols provide for:

- Proper identification of the individual being tested (i.e., photo identification).
- Steps to inform the individual being tested about the testing process.
- Secure testing methods and collection of samples to avoid tampering and contamination.
- Collection of samples within appropriate time limits for the substances being collected.
- Verification that the samples collected were provided by the individual whose name is on them.
- Appropriate handling and communication of results in compliance with Ovintiv's Alcohol & Drug Policy and Practices and appropriate legislation.

Positive Tests

A positive alcohol test is one in which the BAC is at or above 0.04 percent. However, safety-sensitive employees with test results of 0.02 percent to 0.039 percent BAC level will be removed from duty for the remainder of their shift and may be referred for a medical evaluation. In instances where an employee is subject to a return-to-work testing program after a policy violation or substance abuse treatment, a positive test may be one in which the BAC is 0.02 percent or more.

A positive drug test is one in which the amount of drug confirmed in a sample is at or exceeds the established cut-off levels for workplace testing programs. These cut-off limits are as follows:

Breathalyzer

Substance	Screening cut-off	Confirmation cut-off
Alcohol	0.02% (BAC)	0.04 (BAC)

Urinalysis

Substance	Screening cut-off	Confirmation cut-off
Marijuana (THC)	50 ng/ml	15 ng/ml
Cocaine	150 ng/ml	100 ng/ml
Opiates	2000 ng/ml	2000 ng/ml
a) Codeine/Morphine	2000 ng/ml	2000 ng/ml
b) 6-Acetylmorphine (Heroin)	10 ng/ml	10 ng/ml
c) Hydrocodone/Hydromorphone	2000 ng/ml	2000 ng/ml
d) Oxycodone/Oxymorphone	100 ng/ml	100 ng/ml
Phencyclidine (PCP)	25 ng/ml	25 ng/ml
Amphetamines/Methamphetamine		
a) MDMA (Ecstasy)	500 ng/ml	250 ng/ml
b) MDA	500 ng/ml	250 ng/ml
c) MDEA (Eve)	500 ng/ml	250 ng/ml
Barbiturates	300 ng/ml	300 ng/ml
Benzodiazepines	300 ng/ml	300 ng/ml
Methadone	300 ng/ml	300 ng/ml
Propoxyphene	300 ng/ml	300 ng/ml

Hair Analysis

Substance	Screening cut-off	Confirmation cut-off
Marijuana (THC)	10 pg/10 mg	1 pg/10 mg
Cocaine	5 ng/10 mg	5 ng/10 mg
Cocaine metabolites	5 ng/10 mg	0.5 ng/10 mg
Opiates	2 ng/10 mg	2 ng/10 mg
Phencyclidine	3 ng/10 mg	3 ng/10 mg
Amphetamines/Methamphetamine	5 ng/10 mg	5 ng/10 mg

*A ng/ml means nanograms per milliliter. A nanogram is one billionth of a gram. A milliliter is one thousandth of a liter.

Medical Review Officer Process

If a test result is flagged as positive, a qualified MRO will review the result with the individual in accordance with the professional standards and procedures in an effort to confirm whether it could have resulted from the legitimate use of medications or some other medical explanation. The individual will be given an opportunity to explain the finding to the MRO who will then determine whether the result will be reported to the company as a negative or a verified positive.

A confirmed positive test result will be considered a violation of the Alcohol & Drug Policy and Practice, whether or not the alcoholic beverage or drugs were actually consumed on Ovintiv business or premises.

The company reserves the right to unilaterally amend, change, modify, delete, replace or add to the statements in this practice, at any time, with or without prior notice. The company also reserves the right to interpret the provisions of this policy, and such interpretations will be final and binding. In addition, not every situation can be anticipated in written policies or practices, guidelines or procedures, and the facts surrounding any situation can require discretionary judgments by appropriate levels of management.

Searches

Searches may be conducted at any time to determine if alcohol or illicit drugs are present on premises owned, contracted or otherwise controlled by the company. Supervisors are responsible for identifying reasonable grounds for an unannounced search, but under no circumstances will supervisors take possession of illicit material.

All searches will be conducted under the direction of security, however, the company reserves the right to use other reasonable and appropriate investigative means that it deems necessary under the circumstances.

The company has the right to report illegal activity to law enforcement authorities.

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