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Brunel Energy, Inc.

Drug and Alcohol Policy Statement

Any employee or contractor on duty or on company property who possesses, sells, receives, is impaired, or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post-drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

Any employee or contractor involved in a job-related incident while on duty or involving company equipment will be subject to a post-incident drug/alcohol screen.

If an employee or contractor returns to work following an absence of more than 90 days a return to work screening shall occur. Follow-up drug screening shall be applied when appropriate as determined by management.

We reserve the right to conduct random drug and alcohol screenings on employees and contractors who perform safety-sensitive functions, such as driving company property or entering any worksite. Additionally, we also reserve the right to conduct unannounced random drug and alcohol screening on employees or contractors entering any worksite. We will require an employee or contractor to submit to a drug/alcohol screen if we have reasonable suspicion to believe that he/she has violated the prohibitions concerning alcohol and/or controlled substances based on observations concerning the appearance, behavior, speech, or body odors of that person.

Contractors or employees maintaining or using prescribed medications shall report the circumstances and effects to their supervisor. Some types of medications could have undesirable effects, and these can create a safety risk and endanger other contractors.

Periodically, unannounced inspections will be made of persons entering or leaving company work sites by authorized company representatives. Entry onto a company or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The contractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality.

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If another contractor or employee comes to management with concern regarding another contractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue an investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

Paul Ratcliffe (VP US Market)

Print Name and Title