

INTOWORK AUSTRALIA DRUG AND ALCOHOL POLICY

IntoWork Australia is committed to providing a safe, healthy and secure environment for all employees and for those affected by its operations and activities; and on mitigating risks associated with the adverse effects of drugs and alcohol in the workplace.

IntoWork Australia recognises that inappropriate use of drugs and alcohol by employees can have serious adverse effects on their own health, and safety of others, and that the use of drugs and/or alcohol in the workplace may impair a person's ability to perform their work safely, efficiently and with respect for colleagues, customers and others. Drug and alcohol usage becomes an occupational health and safety issue if a person's ability to exercise judgement, coordination, motor control, concentration and alertness at the workplace is impaired, leading to an increased risk of injury or accidents to themselves or others at the workplace.

The purpose of this policy is to:

1. define clear expectations in relation to expected standards of behaviour when attending work, particularly in relation to the expectation that employees are not under the influence of alcohol or illicit drugs whilst attending work, surrounding environments and for attendance at work-related functions conducted outside normal working hours;
2. minimise the impact on productivity and health and safety of people in the workplace, caused by drug and alcohol misuse; and
3. eliminate the likelihood of damage, injury and/or other negative effects that may arise from drug and alcohol misuse in the workplace.

In this Policy, "Group" refers to all companies within the IntoWork Australia Group collectively, and includes the parent company, Inner Northern Group Training Ltd (trading as IntoWork Australia), and all of their associated entities.

This policy applies to people who are employed or engaged with the Group, in any one of the following capacities:

- as a paid employee (including internally hosted trainees and labour hire staff);
- as a self-employed person engaged as an independent contractor;
- as a volunteer (including work experience placements);
- as a director;
- as a student using the Group's training facilities.

This policy is not restricted to the workplace or work hours. The obligations in this policy are also applicable to any work related event, function, operation and/or activity connected to the Group conducted either during or outside normal working hours. These may include, for example, onsite events, conferences, work lunches, Christmas parties, Group inductions and alike.

For the purpose of this policy, the term 'drugs' refers to all legal and illegal drugs including but not limited to nicotine, tobacco, alcohol, cannabis, heroin, cocaine and amphetamines. Illegal drugs are those for which the production, possession, consumption or sale is an offence under Commonwealth or State laws. The term 'medical drugs' refers to all drugs and medication which are used for medical purposes and includes drugs prescribed by a medical practitioner or those purchased from a pharmacy or elsewhere for the purpose of assisting with the treatment of an illness.

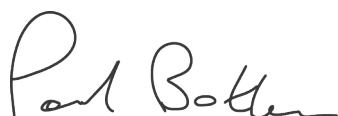
It is the policy of IntoWork and all our businesses that:

1. This policy and other relevant information on the risks associated with the use and abuse of drugs and alcohol in the workplace will be provided to all employees and training participants
2. The possession, consumption, distribution or sale of illegal drugs is strictly prohibited at any IntoWork business controlled premises or workplaces provided by clients
3. The employment of any employee in the possession of, or involved in the consumption, distribution or selling, of illegal drugs at any IntoWork business, controlled premises or workplaces, provided by clients and work sanctioned events, will result in immediate termination

4. Inappropriate drug and alcohol use at work or any work sanctioned event is to be reported to an employee's supervisor or management, for action which may include possible investigation, disciplinary action and/or referral to appropriate treatment or counselling
5. Employees are responsible for checking with their doctor to establish if medical drugs that are prescribed or recommended for their use may affect their ability to work safely. Employees are required to inform their supervisor if medical drugs being consumed may impair their judgment or performance and capacity to work safely so that alternative work arrangements can be determined if required
6. Senior management has the discretion to permit limited alcohol consumption for approved and authorised business functions. Arrangements for such functions will include the provision of low-alcohol and non-alcoholic beverages
7. Procedures are developed and maintained for dealing with alleged breaches of this policy

Implementation of this policy at each IntoWork business is the responsibility of their senior management. The maintenance and review of this policy is the responsibility of the HR Manager in consultation with the Group CEO. The review will be conducted in consultation with senior management of the IntoWork businesses.

This policy has been developed in consultation with interested parties and with consideration to access and equity principles and legislative requirements.

A handwritten signature in black ink that reads "Poul Bottern".

Poul Bottern

IntoWork Australia Group CEO

Date: 9 August 2021

GUIDANCE NOTES

These Guidance Notes accompany the IntoWork Drug and Alcohol Policy. They are provided to assist in achieving the objective of the policy at each Group business. These guidance notes are not policy and are for guidance use only. Additional information and assistance with the development and implementation of the required management systems is available by contacting IntoWork.

1. This policy and other relevant information on the risks associated with the use and abuse of drugs and alcohol in the workplace will be provided to all employees and training participants.

There is a legal requirement to provide information, instruction and training on risks associated with work being performed. The use of drugs and alcohol should be managed like any other workplace hazard. The statement applies to all employees and any participants in training programs, if applicable, being provided. Employees include staff and employees placed at client provided workplaces. The information contained in the policy must be provided. Relevant information should be determined and provided. The business should be able to demonstrate that the policy statement is being implemented. An example could be including a copy of the policy and relevant information in an employee induction program.

2. The possession, consumption, distribution or sale of illegal drugs is strictly prohibited at any IntoWork business controlled premises or workplaces provided by clients.

The possession, consumption, distribution or sale of illegal drugs is a criminal offence. The statement applies to anyone attending the business premises and employees and training participants at client or provider workplaces. Relevant evidence should be maintained that the policy statement is being enforced. An example could be reiterating information on inappropriate drug and alcohol use in a business newsletter.

3. The employment of any employee in the possession of, or involved in the consumption, distribution or selling, of illegal drugs will be terminated.

The possession, consumption, distribution or sale of illegal drugs is a criminal offence. The statement applies to all employees including staff and employees placed at client provided workplaces. The business should be able to demonstrate that the policy statement would be implemented if required and that appropriate procedures have been established. An example could be including the condition in an employee's conditions of employment.

4. Inappropriate drug and alcohol use at work or any work sanctioned event is to be reported to an employee's supervisor or management, for possible referral to appropriate treatment or counselling.

The intention of the policy statement is to support self-reporting of drug and alcohol issues by employees and the provision of support services by the business. The statement applies to all employees including staff and employees placed at client provided workplaces. The business should be able to demonstrate that employees and supervisors are aware of reporting procedures and the support services available and that appropriate services are maintained. An example could be including the information in a staff health and well-being program.

5. Employees are responsible for checking with their doctor to establish if medical drugs that are prescribed or recommended for their use may affect their ability to work safely. Employees are required to inform their supervisor if medical drugs being consumed may impair their judgment or performance and capacity to work safely so that alternative work arrangements can be determined.

Employees may be using medication that affects their capacity to work safely. This would include work-related driving. The effects of medication on employees should be managed like any other workplace hazard. The statement applies to all employees including staff and employees placed at client provided workplaces. The employee has the responsibility for obtaining advice from their medical provider and advising their supervisor if the medication may affect their ability to work safely. Managing the risks associated with the use of the medication includes determining appropriate or alternative work arrangements which may include restrictions. The business should be able to demonstrate that employees and supervisors are aware of the risks associated with taking medication that impairs judgment or performance and capacity to work safely and the reporting requirements. An example could be including the information at the bottom of a leave application form.

6. Senior management has the discretion to permit limited alcohol consumption for approved and authorised business functions. Arrangements for such functions will include the provision of low-alcohol and non-alcoholic beverages.

The policy is applicable to attendance at authorised work-related functions conducted during and outside normal working hours. The intention of the policy statement is to manage the risks associated with excessive alcohol consumption. The use of alcohol provided at business functions should be managed like any other workplace hazard. The controls being exercised in the policy statement are limiting the amount of alcohol consumed and providing low-alcohol and non-alcohol alternatives for employees and guests. The business should be able to demonstrate that the requirements of the policy statement are being implemented.

7. Procedures are developed and maintained for dealing with alleged breaches of this policy.

The policy statement is applicable to all employees including staff and employees or trainees placed at a client provided workplace and people attending the business premises. The business would be required to determine, develop and maintain appropriate procedures for dealing with an alleged breach of the policy. This could include for example, conducting an investigation; implementing counselling and disciplinary action; and termination of employment. The business should be able to demonstrate that systems have been developed and maintained to implement the requirements of this policy statement.