

EMPLOYEE & VOLUNTEER DRUG AND ALCOHOL POLICY

Golf Canada's Commitment:

The Royal Canadian Golf Association, operating as Golf Canada ("Golf Canada") is committed to protecting the safety, health, and well-being of all Employees, volunteers, visitors and participants in Golf Canada activities, especially its child and youth participants.

Purpose:

This policy (the "**Policy**") sets out the expectations of Golf Canada Personnel regarding the use of Illegal Drugs and Alcohol at Golf Canada Locations and when carrying out Golf Canada duties.

Policy:

Golf Canada recognizes that the use of Illegal Drugs and Alcohol may pose threats to our goals and values. Therefore, Golf Canada Personnel are strictly forbidden from the use of Alcohol, Illegal Drugs and/or Marijuana at all times while carrying out their employment and volunteer functions, except that:

- Medication use is permitted, provided that Golf Canada Personnel remain Fit for Work; and
- moderate use of Alcohol is permitted at some Social Events, provided that Golf Canada Personnel remain Fit for Work.

Definitions:

- "Alcohol" means any beverage that may be legally sold and consumed, that has an alcoholic content in excess of 1.1% by volume.
- "Employee" means anyone in an employment relationship (full-time, part-time or casual), as well as any dependent or independent contractors with Golf Canada.
- "Fit for Work" means the ability to safely and competently perform assigned duties without any limitations or impairment due to the use or after-effects of Illegal Drugs, Alcohol, Marijuana or Medication in a manner that does not compromise or threaten personal safety or health, the environment, or property.
- "Golf Canada Location" means all places where Golf Canada's business and activities are conducted, including, any place where Golf Canada-related activities or events occur away from Golf Canada's offices or other premises.
- "Golf Canada Personnel" means Employees and Volunteers and "Golf Canada Person" means any Employee or Volunteer.
- "Illegal Drugs" means any drug which has not been legally obtained or is not legally obtainable in Canada and whose use, sale, possession, purchase or transfer is restricted or prohibited by law, including but not limited to medication obtained without a valid prescription.
- "Impairment" means a state of being under the influence of alcohol or drugs, whether legal or illegal. Signs of impairment may include glassy or red eyes, unsteady gait, slurring of speech and/or poor coordination or other atypical behaviour.
- "Marijuana" means cannabis, as listed under Schedule II of the *Controlled Drugs and Substances Act*, S.C. 1996, c. 19, which is consumed or possessed on a non-medically authorized basis, including but not limited to cannabis flowers, leaves, oils and edibles.
- "Medication" means any substance prescribed for individual consumption by a licensed medical practitioner, including but not limited to medically-prescribed Marijuana and any legally obtained over-the-counter remedies.

- "Social Events" are special celebrations, receptions or social activities hosted by Golf Canada or Golf Canada clients, industry and business associates, or sponsors.
- "Volunteer" Is any individual who is a member of the board of directors, a committee or council of Golf Canada and others who volunteer at Golf Canada events or are identified on Golf Canada's event duty roster.

To clarify, for the purposes of this Policy, Volunteers provided by host clubs are subject to this Policy when engaged in Golf Canada events. This Policy and other expectations will be communicated to host club Volunteers during their orientation.

Application:

This Policy applies to all Golf Canada Personnel, as follows:

- during work hours, including work breaks;
- while conducting business or otherwise performing duties for Golf Canada, including travelling for work purposes;
- while at a Golf Canada Location;
- while operating a Golf Canada vehicle (owned, rented, leased or loaned); and
- whenever representing Golf Canada or where there is a potential impact on Golf Canada's reputation or interests.

Guidelines:

Subject to limited exceptions for medically-prescribed Marijuana, legislation prohibits the consumption of cannabis in the workplace. Golf Canada Personnel must abide by all applicable statutory requirements, including those that pertain to the possession and use of cannabis.

Applicable statutory requirements, as amended from time to time, include under the:

- Occupational Health and Safety Act
- Smoke Free Ontario Act, 2017 or similar legislation in other jurisdictions
- Human Rights Code
- Ontario Cannabis Act, 2017 or similar legislation in other jurisdictions
- Access to cannabis for medical purposes regulations

This Policy will be interpreted so as to be in compliance with all applicable laws, including the above-noted acts.

Responsibilities:

Golf Canada will:

- communicate this Policy to all Golf Canada Personnel;
- provide education regarding this Policy, including information about the use of Illegal Drugs, Marijuana, Alcohol, or Medication, to Golf Canada Personnel;
- ensure safe transportation for Golf Canada Personnel at Social Events where Alcohol is being served;
- offer support to any Golf Canada Person who voluntarily seeks assistance for Illegal Drugs, Marijuana or Alcohol dependency or abuse, or addiction to Medication;
- relieve or remove from duty any Golf Canada Person if they have reasonable grounds to suspect that individual is not Fit for Work; and
- take steps to investigate any possible violation of this Policy.

Golf Canada Personnel will:

- · read, understand and comply with this Policy;
- be Fit for Work at all times while carrying out their duties, including while driving;

- use medically-prescribed Marijuana and other prescription and over-the-counter medications safely and responsibly:
- exercise good judgment in consuming Alcohol during Social Events;
- be free of Illegal Drugs and Marijuana during Social Events;
- report any violations of this Policy to the Human Resources Department or a senior Golf Canada Person as soon as possible; and
- understand that they may be subject to disciplinary action.
- read, understand and comply with this Policy;
- If a Golf Canada Person is required to take Medication that could impair their job performance or ability to carry out their duties, they must inform the Human Resources Department as soon as possible and prior to the commencement of the Medication, if possible. Golf Canada may request documentation, from a licensed physician, to confirm the individual's ability to perform the duties of their position, to assess any related limitations and to substantiate any alternate job functions or responsibilities, as applicable and appropriate.
- Golf Canada recognizes that drugs (Illegal Drugs, Marijuana or Medication) and/or Alcohol dependency is an illness. Golf Canada Personnel suffering from a dependency or abuse problem are encouraged to seek assistance.
- Golf Canada Personnel who disclose that they have a dependency, addiction or abuse problem may be subject to certain conditions or return to work protocols, which will be developed on a case by case basis through the Human Resources department.

Employee Assistance Program:

Golf Canada provides an Employee Assistance Program ("EAP") as a paid benefit to assist Employees with personal, family, and work issues, including those related to dependency, addiction or abuse. Employees (and their dependents) can receive support over the telephone, in person, online and through a variety of issue-based health and wellness resources through the EAP.

Consequences of a Policy Violation:

Investigation:

- In all situations involving a suspected Policy violation, an investigation will be conducted by Golf Canada.
- An Employee whose conduct is at issue may be suspended, with or without pay, during the investigation and removed from the Golf Canada Location.
- A Volunteer whose conduct is at issue may be relieved of his or her responsibilities during the investigation and asked to stay away from Golf Canada Locations.

Disciplinary and Corrective Measures:

- Based on the findings of the investigation, the Human Resources Department will decide whether this Policy
 has been violated and what steps, if any, will be taken as a result.
- Golf Canada Personnel found in violation of this Policy may be subject to disciplinary action, up to and
 including termination of employment or voluntary service. Where applicable, Golf Canada may also take
 legal action in accordance with the law.

Confidentiality:

Golf Canada will handle all personal information related to this Policy in a confidential manner, and not make any disclosure of such information unless the disclosure is necessary for protecting Golf Canada Personnel or others, investigating a complaint or incident, taking corrective action, assessing and developing an accommodation plan, or otherwise required by law.

Acknowledgment:

I acknowledge that I have received a copy of Golf Canada's *Drug and Alcohol Policy* (the "**Policy**"). I agree to read and familiarize myself with the information in the Policy. Furthermore, I agree to follow and abide by all of the rules that the Policy contains and will ensure that Golf Canada Personnel working under my direction are aware of this Policy.

I further understand that my failure to comply with the Policy may result in disciplinary action, up to and including the immediate termination of my employment for just cause for an Employee or immediate discharge from responsibilities for a Volunteer.	
Employee/Volunteer Signature:	
Printed Name:	Date:

I further understand that the Policy shall be continually evaluated and may be amended or modified as may be

required from time to time.

Should you have any questions regarding this Policy, please communicate with the Human Resources Department.