

ADCORP AUSTRALIA – DRUGS & ALCOHOL POLICY

Process Area	Health, Safety & Environment	Policy Owner:	Head: AHA People and Culture
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This policy is applicable to the Adcorp Group of companies, its affiliates and subsidiaries in Australia in which it operates hereinafter referred to as "Adcorp".

Policy Summary:

The Drugs and Alcohol Policy establishes Adcorp's commitment to maintaining a safe, healthy, and zero-impairment workplace for all employees, contractors, and visitors. In accordance with the Work Health and Safety Act 2011 (Cth), the policy mandates that all workers present for duty fit for work and prohibits the possession, sale, or consumption of illegal drugs at any work-related location or function. Notably, the policy includes specific provisions regarding kava consumption, requiring a 12-hour stand-down period before safety-sensitive tasks, and establishes a framework for drug and alcohol testing by accredited third parties. Adcorp prioritizes a supportive approach by offering confidential assistance through an Employee Assistance Program (EAP) for dependency issues, while maintaining that serious breaches may result in disciplinary action up to and including termination under the Fair Work Act 2009 (Cth).

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1. POLICY STATEMENT

Adcorp is committed to providing a safe and healthy workplace, free from the risks associated with the misuse of drugs and alcohol. This policy applies to all workers, including employees, contractors, and visitors, and covers all work-related activities, locations, and functions, including Christmas parties and other social events.

This policy aims to

- Ensure all workers are fit for work and can perform their duties safely.
- Minimise the risk of injury, illness, or property damage caused by drug or alcohol impairment.
- Provide support to workers who may have a drug or alcohol-related problem.
- Uphold the professional reputation and integrity of Adcorp.

2. ROLES AND RESPONSIBILITIES

Management (PCBU and Officers):

Management is responsible for implementing and enforcing this policy. This includes:

- Managing and monitoring risks associated with drugs and alcohol in the workplace.
- Providing appropriate information, training, and supervision.
- Ensuring confidentiality and procedural fairness when dealing with a breach of this policy.
- Offering confidential support through an Employee Assistance Program (EAP) to workers with drug or alcohol issues.
- Where impairment or dependency is identified, Adcorp will provide support and referral options before considering disciplinary action, consistent with WHS best practice.

Workers:

Fit for work means being physically, mentally, and emotionally capable of performing assigned duties safely and effectively without risk to self or others. All workers must:

- Present for work fit for duty to perform their duties without being impaired by drugs or alcohol.
- Not possess, consume, sell, or be under the influence of illegal drugs while at work or at any work-related function.
- Take reasonable care for their own health and safety and that of others.
- Report any concerns about a fellow worker's fitness for duty.

3. DRUGS AND ALCOHOL AT THE WORKPLACE

Adcorp maintains a zero-impairment policy — workers must not perform duties if affected by alcohol, kava, drugs, or medication that impairs their ability to work safely.

Alcohol: The consumption of alcohol is generally prohibited during work hours, including lunch breaks, unless specifically approved by management for a business-related function.

Illegal Drugs: The use, possession, or sale of illegal drugs is strictly prohibited on Adcorp's premises or at any work-related event.

Prescription and Over-the-Counter Medication: It is a worker's responsibility to ensure that any medication they are taking does not impair their ability to perform their duties safely. Workers must inform their manager if they are taking medication that may affect their performance. This information will be kept confidential. Medical information will only be requested to the extent necessary, with safeguards under the Privacy Act 1988 (Cth).

Kava Consumption and Fitness for Work: Adcorp recognises that kava consumption is an important cultural practice for some workers, particularly from Pacific Island communities. However, it is essential that all workers present for duty in a fit and unimpaired state to ensure safety and compliance with Adcorp's duty of care under the Work Health and Safety Act 2011 (Cth).

Workers must not attend work under the influence of kava or consume kava within a timeframe likely to cause impairment during work hours.

Kava consumption can cause drowsiness, delayed reaction time, and reduced alertness, which may continue for several hours after consumption.

Workers involved in safety-sensitive tasks (such as operating machinery, driving, or supervising others) must allow at least 12 hours between kava consumption and the commencement of work.

Management will treat kava impairment in the same way as alcohol or drug impairment under this policy.

Education and awareness sessions may be provided to help workers understand how kava affects workplace performance and safety. Support and advice are available through the Employee Assistance Program (EAP) for any worker concerned about the impact of kava or other substances on their wellbeing or work performance.

4. WORKPLACE FUNCTIONS AND ACCEPTABLE CONDUCT (INCLUDING CHRISTMAS PARTIES)

Workplace functions, including Christmas parties, are considered an extension of the workplace. All company policies, including this Drugs and Alcohol Policy and the Code of Conduct, apply.

Responsible Drinking: Workers are expected to drink responsibly and in moderation. Management will ensure the responsible service of alcohol, including providing food and non-alcoholic alternatives.

Travel: It is the responsibility of each worker to arrange safe travel to and from the function. Driving under the influence of alcohol or drugs is a breach of the law and this policy.

Behaviour: All workers are expected to behave in a professional and respectful manner.

Unacceptable conduct, including harassment, bullying, discrimination, or any form of aggressive or violent behaviour, will not be tolerated. Such conduct may result in disciplinary action, up to and including dismissal.

5. DRUG AND ALCOHOL TESTING

In certain circumstances, and in line with our duty to manage WHS risks, Adcorp may conduct drug and alcohol testing. The purpose of testing is to identify and manage risk, not to punish.

Situations for Testing: Testing may occur as part of a pre-employment screening process, after a workplace incident, or when there is a reasonable belief that a worker may be impaired.

Procedure: All testing will be conducted with respect for a worker's privacy and confidentiality, following a fair and transparent procedure.

Refusal to Test: A worker's refusal to undergo a lawful request for a drug or alcohol test may be considered a breach of this policy.

Drug/alcohol testing will be conducted by a qualified and accredited third-party (AS/NZS 4308:2008 for urine / AS 4760:2019 for oral fluid).

If there is a reasonable belief that a worker is impaired by kava or any other substance, Adcorp may stand the worker down pending assessment.

6. CONSEQUENCES OF A BREACH

Breaches of this policy will be dealt with seriously and on a case-by-case basis. Consequences may include:

- Confidential counselling.
- Formal warnings.
- Suspension.

Disciplinary action, including termination of employment for serious or repeated breaches, in line with the Fair Work Act 2009 (Cth). A support person will be allowed during investigations or disciplinary procedures to ensure procedural fairness.

7. POLICY REVIEW

This policy will be reviewed periodically or as required, to ensure its ongoing effectiveness and compliance with legislative changes.

ANNEXURE A – RELATED DOCUMENTATION AND LEGISLATION

This policy should be read in conjunction with the following legislation and other Adcorp policies and documentation:

Australia:

Legislation applicable to Australia:

Work Health and Safety Act 2011 (Cth): Establishes the primary duty of care for PCBUs to ensure a safe work environment, including managing risks from drugs and alcohol.

Work Health and Safety Regulations 2011 (Cth): Provides specific regulations and duties related to WHS, which inform the development of policies like this one.

Fair Work Act 2009 (Cth): Sets out the legal framework for employment relations, including the grounds for valid reasons for dismissal based on serious misconduct, which can include intoxication at work.

Safe Work Australia – Guide for Managing Risks of Alcohol and Other Drugs in the Workplace (2023 update)

Fair Work Commission decisions on impairment and cultural considerations (e.g., FWC 2019 decisions regarding fitness for duty).

State and Territory Legislation

Each state and territory has its own WHS Act and Regulations, which are largely based on the federal model. Adcorp will comply with the specific legislation of the jurisdiction(s) in which it operates.

New South Wales: Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2017 (NSW).

Victoria: Occupational Health and Safety Act 2004 (VIC) and Occupational Health and Safety Regulations 2017 (VIC). (Note: Victoria has not adopted the model WHS Act.)

Queensland: Work Health and Safety Act 2011 (QLD) and Work Health and Safety Regulation 2011 (QLD).

Western Australia: Work Health and Safety Act 2020 (WA) and Work Health and Safety Regulations 2022 (WA).

South Australia: Work Health and Safety Act 2012 (SA) and Work Health and Safety Regulations 2012 (SA).

Tasmania: Work Health and Safety Act 2012 (TAS) and Work Health and Safety Regulations 2012 (TAS).

Australian Capital Territory: Work Health and Safety Act 2011 (ACT) and Work Health and Safety Regulation 2011 (ACT).

Northern Territory: Work Health and Safety (National Uniform Legislation) Act 2011 (NT) and Work Health and Safety (National Uniform Legislation) Regulations 2011 (NT).

Code of Practice

Safe Work Australia's "Guide to Managing the Risk of Alcohol and Other Drugs at the Workplace".