

PROCEDURE

SUBSTANCE AND ALCOHOL MISUSE AT WORKPLACE

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Rev. No.	Prepared by Gamuda Healthcare	Reviewed by Head of QSHE	Reviewed by Head of HR	Approved by Managing Director

Amendment History

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1. PURPOSE

Gamuda is committed to providing a safe, healthy, and productive work environment for all employees, contractors, and visitors. This procedure outlines the company's stance on substance and alcohol misuse to safeguard workplace safety, compliance with Malaysian laws, and adherence to industry standards.

This procedure also provides guidance on:

- Maintaining the company's commitment to a safe and healthy work environment for all people at our premises or project sites.
- Stating the company's position on the use and misuse of drugs and alcohol in the workplace.
- Minimizing risks caused by, or associated with, drugs and alcohol at the workplace.
- Setting out clear rules and procedures regarding substance abuse and substance misuse.

2. SCOPE

This procedure applies to:

- All employees (permanent, fixed-term and temporary).
- Contractors, subcontractors, vendors, and their employees.
- Interns, trainees, independent consultants and any person performing work for or on behalf of Gamuda.
- All work locations, including project sites, offices, transportation/vehicles, company vessels and any points of embarkation/disembarkation.

This procedure is governed by applicable Malaysian employment, occupational safety and health, and dangerous drugs legislation, as well as relevant client and industry requirements.

3. DEFINITION OF TERMS AND ABBREVIATIONS

Term	Definition
Drug	Unless otherwise specified, it refers to compounds with psychoactive properties that are either listed under the Malaysian Dangerous Drugs Act or declared by competent authorities or clients.
Substance	A material that chemically modifies the body's functions, resulting in physical, psychological, or behavioral change.

Term	Definition
Substance misuse	• Use of psychoactive drugs without legal prescription, or • Use of such drugs for effects beyond their therapeutic benefits, or • For alcohol, being under the influence while at work.
Donor	Person who needs to undergo testing.
Critical/safety sensitive position	Roles where impairment could directly or indirectly jeopardize operations, safety, health, environment or security (for example, operating heavy machinery, driving company vehicles, processing plant operations, crane & rigging, confined space work).

Abbreviation	Definition
HOD	Head of Division/Department
DER	Designated Employer Representative
MRO	Medical Review Officer
AMRO	Assistant Medical Review Officer
POCT	Point of Collection Testing
COC	Chain of Custody

4. RESPONSIBILITIES

4.1 Top Management

- a) Top management to establish comprehensive Substance and Alcohol-Free Workplace Programs (SAFWP) which should consist of:
 - Substance and Alcohol Misuse procedure
 - Employee training and awareness
 - Workplace drug & alcohol testing
 - Recordkeeping
- b) Provide resources to implement the program and ensure compliance at all levels.
- c) Decide, or endorse decisions, on the implementation of testing strategies required by law, client or risk assessment.

4.2 Human Resource

- a) Act as the custodian for this procedure together with QSHE
- b) Ensure overall compliance with this procedure and related disciplinary procedures.

- c) Maintain confidential records of all drug and alcohol screening (pre-employment, pre-deployment, post-incident, random, periodic and for-cause)
- d) Provide guidance to management on disciplinary actions, including suspensions, terminations, and appeals.

4.3 QSHE Department

- a) Co-custodian (with Human Resource Team) of the procedure and initiator of procedure reviews and updates
- b) Engage technical support service provider for drug and alcohol testing, including test methods, equipment, and cut-off limits.
- c) Facilitate training for “collectors” and involved personnel (e.g. AMRO, line supervisors).
- d) Verify or audit contractors’ drug and alcohol procedures to ensure alignment with Gamuda’s standards and client requirements.
- e) Provide guidance and training to Heads of Department (HODs) on substance misuse and its impact on safety and health.

4.4 Heads of Department, Managers and Supervisors

- a) Be responsible for applying this procedure in areas under their control.
- b) Identify employees whose performance, behavior, or fitness for duty may be affected by substance misuse.
- c) Stop impaired employees from continuing work and, if necessary, remove them from the work area.
- d) Arrange safe transportation homes for impaired employees (e.g. calling a taxi) where appropriate.
- e) Inform QSHE, HR and other relevant authorities or clients of incidents, where applicable.
- f) Initiate or request drug and/or alcohol tests where there is reasonable suspicion, following the procedures in this procedure.

4.5 Employees

- a) Comply with this procedure and all related procedures at all times.
- b) Refrain from the use, possession, distribution or sale of illegal drugs, alcohol or prohibited substances while on company premises, vehicles, vessels or while conducting company duties.
- c) Not report for duty or conduct company business under the influence of drugs, alcohol or prohibited substances.
- d) Inform their supervisor before commencing work if they are taking prescription or over-the-counter medication with warnings that may affect their ability to work safely.

- e) Immediately inform their supervisor, manager, or representative if they have concerns about working with another team member who may pose a safety risk due to possible drug or alcohol use.
- f) Volunteer information and seek help where they believe they may have a dependency problem.

Employees in charge of vehicles, machinery, hazardous chemicals or hazardous activities, and those in critical positions, must always be free from the influence of alcohol and/or any drugs (prescription or otherwise) that may impair performance.

4.6 Designated Employer Representative (DER)

- a) Serve as key person for drug and alcohol program functions.
- b) Receive results from the MRO and implement subsequent actions in accordance with Gamuda's Substance & Alcohol Misuse Procedure.
- c) DER should be familiar with the testing procedure and Gamuda's Substance & Alcohol Misuse Procedure.

4.7 Medical Review Officer (MRO)

- a) Review non-negative results
- b) Verify chain of custody (COC)
- c) Interpret test results and correlate with any medical explanations
- d) Contact and interview donors
- e) Maintain confidentiality
- f) Report on safety risks
- g) Record keeping
- h) Risk management by avoiding conflict of interests (e.g., no financial ties to labs) or decline involvement in non-compliant drug testing programs.

4.8 Assistant Medical Review Officer (AMRO)

- a) Provide administrative and operational support to the Medical Review Officer (MRO)
- b) Conduct on-site sample collections and screening test
- c) Assist in maintaining confidentiality of sensitive data

4.9 Contractors and Others

- a) Contractors, subcontractors, and others working on behalf of the company shall adhere to this procedure; however, disciplinary measures will be administered under the terms and conditions of their contracts.
- b) Contractors are required to maintain and provide pertinent records related to their own drug and alcohol programs upon request.

5. PROHIBITED CONDUCT

Employees, contractors and others covered by this procedure are strictly prohibited from:

- a) Using, possessing, distributing, supplying or selling illegal drugs, prohibited substances or alcohol in the workplace, on company premises, in vehicles/vessels or while conducting company business.
- b) Reporting for duty or working while under the influence of alcohol, illegal drugs, misused prescription or over-the-counter medication, or any substance that may impair performance.
- c) Consuming alcohol during working hours or on company premises, unless at company-sanctioned events with prior approval and within reasonable limits.
- d) Refusing or failing, without reasonable justification, to submit to a required drug or alcohol test under this procedure.
- e) Refusing consent to a search where there are reasonable grounds to suspect the presence of prohibited substances, as outlined in the *Searches and Inspections* section.
- f) Failing to disclose to a line manager the use of prescription or proprietary drugs that may have side effects impacting safety or performance.

6. DRUG AND ALCOHOL TESTING

6.1 Drug and Alcohol Cut off Values

Drug/ Drug Metabolites	Concentration (ng/mL)	
	Screening test (IA)	Confirmatory test (GC-MS)
Amphetamines/Methamphetamines		
• Amphetamine	500	250
• Methamphetamine	500	250
MDMA, MDA, MDEA	500	250
Barbiturates	300	200
Benzodiazepines	300	100
Cocaine	150	100
Cannabis		
• THCA	50	15
Opiates		

Drug/ Drug Metabolites	Concentration (ng/mL)	
	Screening test (IA)	Confirmatory test (GC-MS)
- Codeine, Morphine 6-Acetylmorphine(6-AM)	2000 10	2000 10
Opioids - Hydrocodone/Hydromorphone 1. Hydrocodone 2. Hydromorphone - Oxycodone/Oxymorphone 1. Oxycodone 2. Oxymorphone - Methadone	300 100 300	100 100 200
Phencyclidine (PCP)	25	25
Ketamine	100	100
Ethyl Alcohol	-	0.04% in breathing exhale

**Testing will comply with Malaysian laws and industry standard.*

**Test results and any related medical information as confidential, accessed only as necessary to authorize individual.*

6.2 Test Methods and Facilities

- Testing methods may include breath analysis, urinalysis, or other methods considered appropriate by the company, client, or relevant authority.
- Tests must be performed at medical facilities or locations designated by the company; test results from non-designated facilities will not be accepted.
- Chain of Custody Forms (COC) must be used for all testing, and the integrity of samples must be always preserved.

6.3 Mode of Tests

- Pre-employment screening for selected roles and safety-sensitive positions
Following receipt of a conditional offer of employment, a potential employee, as part of his/her pre-employment medical check-up, will be required to provide a urine/breath sample which will be tested to detect the presence of drugs/alcohol. A positive test may result in the refusal of or termination of employment.
- Pre-deployment into critical/sensitive positions (e.g. high-risk operations)
Before deployment into critical or sensitive positions, particularly those involving high-risk or safety-critical operations, personnel must undergo urine

drug and alcohol testing to confirm fitness for duty. This testing helps ensure workplace safety, reduces operational risk, and confirms that individuals assigned to critical roles are substance-free prior to deployment.

3. Periodic testing (unannounced)

Testing is conducted without prior notice and uses approved urine drug and/or alcohol screening methods. Any non-negative screening results are confirmed through laboratory testing before action is taken. Where applicable, alcohol testing may also be conducted to identify recent alcohol use that could affect safe job performance. Unannounced testing is intended to deter substance misuse, support a safe working environment, and maintain operational readiness.

4. Random screening (unannounced) for a proportion of the workforce, including management

A proportion of the workforce, including management personnel, will be subject to random, unannounced urine drug and alcohol screening to promote fairness, deter substance misuse, and support ongoing fitness for duty. Individuals are selected through a documented random selection process, without prior notice. Random screening applies equally across all designated roles and levels to maintain a safe, compliant, and accountable work environment.

5. Mass screening is determined by risk assessment or client requirement

Mass screening may be implemented when determined necessary by formal risk assessment findings or specific client requirements. Such screening may apply to a defined group, worksite, project, or operational activity. Mass screening is intended to manage elevated risk, meet contractual or client obligations, and maintain safety and compliance during high-risk operations.

6. Testing with cause / reasonable suspicion (signs of impairment, smell of alcohol, abnormal behavior, poor motor skills)

Where there is reasonable cause to believe an individual is in violation of this procedure, the company may require the individual to submit to testing for drugs and/or alcohol and, where appropriate, physical testing of motor skills and reactions. Reasonable cause may include (but is not limited to):

- Observation of impaired motor skills, judgment, or coordination
- Abnormal, unsafe, or aggressive behavior
- Smell of alcohol on breath or body
- Possession of paraphernalia or suspected substances
- Reliable information from witnesses regarding substance use shortly before or during work
- Excessive absenteeism or unexplained performance deterioration may indicate substance misuse

7. Return to Duty and Follow-up Testing

Conducted when an employee is eligible to resume work after violating this procedure or after involvement in a post-incident event, such as a workplace accident, near miss, or other significant safety-related occurrence where drug or alcohol use may be a contributing factor. The purpose of this testing is to confirm the employee is fit for duty and free from the influence of drugs or alcohol before returning to work, particularly in safety-sensitive roles. A negative test result is mandatory prior to reinstatement.

7. SEARCHES AND INSPECTIONS

Gamuda reserves the right to conduct searches if there is reasonable ground to believe that prohibited or restricted substances may be present at work locations. Supervisors are responsible for identifying situations where investigation is justified based on indicators such as behavior, odor, or presence of paraphernalia.

Searches may include, but are not limited to:

- Personal bags, tool bags, and personal effects brought onto site
- Site offices, desks, drawers, and lockers
- Site accommodation, camps, or temporary living quarters were provided by the Company
- Vehicles, plants, machinery, or mobile equipment entering, operating within, or parked on site
- Transportation used to access site locations, including buses or other company-arranged transport
- Personnel entering, leaving, or moving within construction or remote work sites

Where appropriate, the company will cooperate with and support the Police or other enforcement authorities in conducting searches and investigations.

8. CONSEQUENCES OF VIOLATIONS

Violations of this procedure may result in disciplinary action, up to and including dismissal, and where a crime is suspected, reporting to the relevant authorities.

“Breach of this procedure” includes, but is not limited to:

- Any positive result following a test for substances of abuse without a valid medical explanation.

- Production, supply, offering, possession or misuse of a prohibited or restricted substance while on duty or in transit to or from work sites, premises, installations, vessels or training centers, or while on call.
- Refusal to consent to a search or test, or refusal to follow company instructions where there is evidence of possible substance abuse requiring further investigation.
- Failure to advise a line manager of possible side effects of proprietary or prescribed drugs that may affect work performance or safety.
- Failure to comply with medical recommendations and other requirements during a rehabilitation program.
- Being charged with a drug-related offence that may impact job suitability, client acceptance or company reputation; such cases may lead to suspension (with or without pay) and further disciplinary action, up to dismissal.

Illustrative disciplinary actions may include:

- Non-compliance: Suspension, termination of employment
- Legal action: if drug possession or distribution violates Malaysian laws (Dangerous Drugs Act 1952)

**Any disciplinary actions will be at HR's full discretion*

Contractors in breach may be treated as having committed to a breach of contract, and the company may act in accordance with contractual terms, including removal from site or contract termination.

9. REPORTING, RIGHT TO DECLARE AND REHABILITATION

The company recognizes drug and alcohol dependencies as treatable conditions. Employees who suffer from drug and/or alcohol dependency are encouraged to seek medical advice and to declare their condition to the company at the earliest opportunity.

Failure to comply with treatment and rehabilitation requirements, or subsequent violations of this procedure, may still result in disciplinary action.

10. RIGHT TO APPEAL

Employees have the right to appeal against disciplinary decisions taken under this procedure by writing to the next level of management, following the company's established appeal or grievance procedures.

11. COMMUNICATION, EDUCATION AND REVIEW

- a) This procedure will be communicated through onboarding programs, site briefings, toolbox talks, and internal communications.
- b) The company will provide education on the dangers of substance abuse and its impact on safety, health, and performance.
- c) Periodic reviews will be conducted to reflect legal changes, emerging risks, client requirements, and opportunities for improvement.

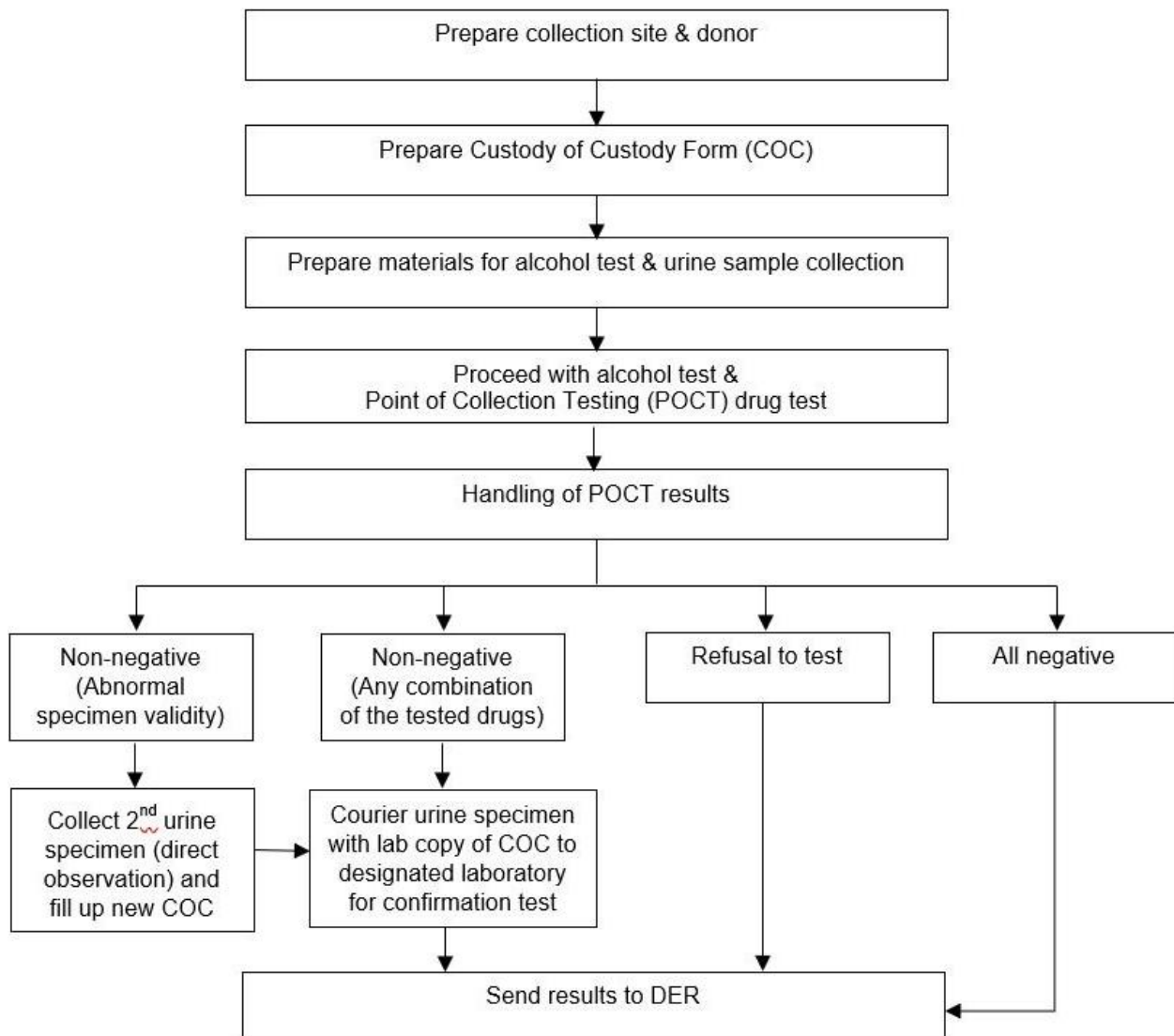
12. CROSS REFERENCE

- Dangerous Drugs Act 1952
- Occupational Safety & Health Act (OSHA) 1995
- US DOT 49 CFR Part 40
- MPM Guidelines on Substance Misuse Control Program
- HR Policies and Procedures Manual (GB-HRPP-7-02)

13. APPENDICES

Appendix A– Summary of Urine Drug And Alcohol Testing

Appendix B – Chain of Custody Form (COC)

APPENDIX A – SUMMARY OF URINE DRUG AND ALCOHOL TESTING



APPENDIX B – CHAIN OF CUSTODY FORM (COC)

GAMUDA HEALTHCARE	CHAIN OF CUSTODY FORM	ID NO :
STEP 1: COMPLETED BY COLLECTOR		
For ABC: Send ALL Laboratory Result to The Following MRO		
	FOR REFUSAL TO TEST ONLY I have been notified by the Company or informed by my supervisor that I am required to submit substance misuse testing of my breath and/or urine as required by the Company. I understand that my refusal to submit to substance misuse testing of my breath and/or urine for alcohol and/or drugs may result in disciplinary action taken by the Company against me. I hereby refuse to authorize or submit to any substance misuse testing of my breath and/or urine for alcohol and/or drugs. Donor Signature : _____ Collector Signature: _____	
A. Donor Name: _____ Company Name: _____ B. Employee ID No/ Contractor IC No: _____ C. Reason For Testing: ☐ Pre-Employment/Pre-Placement ☐ Random ☐ For-Cause ☐ Post-Incident ☐ Other _____ D. Drug test to be performed: ☐ Tetrahydrocannabinol-9-carboxylic acid (THC), Morphine (MOP), Amphetamines (AMP), Methylene-dioxy-methamphetamine (MDMA, Benzodiazepines (BZO), Cocaine (COC) ☐ Other _____ E. Drug test POCT Kit: Lot No: _____ Expired Date: _____ F. Collection Site: ☐ Site A ☐ Site B ☐ Site C ☐ Other _____		
STEP 2: COMPLETED BY COLLECTOR		
G. Alcohol Screening Result ☐ Negative (Pass) ☐ Positive (Fail) Collector Signature: _____ H. Alcohol Confirmatory Test (only if alcohol screening result is positive) ☐ Negative ☐ Positive (Attach the printed result to this form) Collector Signature: _____		
STEP 3: COMPLETED BY COLLECTOR (make remark where appropriate). Collector reads urine sample temperature within 4 minutes		
I. Temperature between 32 - 38°C (90-100°F)? ☐ Yes ☐ No (to collect second specimen under direct observation) J. Sample Validity is good? ☐ Yes ☐ No (to collect second specimen under direct observation) K. Urine Volume sufficient? ☐ Yes ☐ No (refer to Shy Bladder Procedure) L. Type of sample: ☐ First specimen ☐ Observed second specimen ☐ Shy bladder specimen		
STEP 4: COLLECTOR AFFIXES SEAL(s) TO SAMPLE BOTTLE(s). COLLECTOR DATES SEAL(s). DONOR INITIALS SEAL(s). DONOR COMPLETE STEP 5		
STEP 5: COMPLETED BY DONOR		
I certify that I provided my urine sample to the collector, that each sample bottle used was sealed with a tamper-evident seal in my presence, and that the information provided on this form and on the seal affixed to each sample bottle is correct.		
Donor Signature: _____ Donor Name: _____ Date: _____ Handphone No: _____		
STEP 6: COMPLETED BY COLLECTOR		
I certify that urine sample given to me by the Donor identified in the certification Step 5 of this form was collected, labelled and sealed in-front of the Donor.		
Collector Signature: _____ Collector Name: _____ Date: _____ Handphone No: _____		
STEP 7: COLLECTOR TO PROVIDE DONOR WITH COPY 3. DONOR WAITS OUTSIDE UNTIL RELEASED BY COLLECTOR OR DESIGNATED EMPLOYER REPRESENTATIVE (DER)		
STEP 8: COMPLETED BY COLLECTOR		
Urine drug screening (POCT) result ☐ All Negative ☐ Non-Negative ☐ THC ☐ MOP ☐ AMP ☐ MDMA ☐ BZO ☐ COC ☐ Validity ☐ Other: _____		
STEP 9: COLLECTOR TO SEND URINE SAMPLE TO DESIGNATED LABORATORY FOR CONFIRMATORY TEST (if urine POCT result is non-negative)		
1. Fill up designated laboratory Analysis Request Form. 2. Release sample bottle (s) to designated laboratory by courier using sample transportation / shipping box.		