

# ALCOHOL, CANNABIS AND DRUG USE PREVENTION AND MANAGEMENT PROTOCOL

PARAMEK SA

Zona America — Free Zone | Montevideo, Uruguay  
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*Legal Framework: Law No. 14.294 (Narcotics) | Law No. 19.172 (Cannabis) | Law No. 5.031 (Alcoholism)  
Decree 406/988 | ILO Convention No. 155 | Uruguayan Ministry of Public Health — Occupational Health  
Standards*

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## 2. OBJECTIVES

This protocol aims to:

- Prevent alcohol, cannabis and psychoactive substance use in the workplace and its consequences for health, safety and productivity.
- Establish clear procedures for detection, intervention and support in cases of problematic substance use.
- Protect the safety of all employees, clients and third parties present on company premises.
- Comply with applicable Uruguayan legislation on occupational health, risk prevention and cannabis regulation.
- Provide a supportive framework for employees with dependency or problematic use issues, from a health-centered rather than punitive perspective.

## 3. SCOPE OF APPLICATION

This protocol applies to:

- All company employees, regardless of position, seniority or type of contract (full-time, part-time, temporary, interns).
- Contractors, suppliers and third-party staff providing services at company facilities.
- Visitors on company premises, with respect to consumption prohibitions.

It applies in:

- Company facilities and premises (including Zona America Free Zone).
- Company vehicles or vehicles used on business trips.
- Events, activities and travel organized or represented by the company.
- Any activity related to the performance of professional duties.

## 4. LEGAL FRAMEWORK

Regulation	Relevance
Law No. 14.294 (1974) and amendments	Represses illegal trafficking and regulates the use of narcotics and psychotropic substances.
Law No. 19.172 (2013)	Regulates and controls cannabis: adult recreational use, medicinal and industrial. Prohibits use in the workplace.
Decree No. 120/014	Regulatory decree for Law 19.172. Establishes that cannabis use in the workplace is grounds for disciplinary action.
Law No. 5.031 (1914) and Decree 406/988	Regulate alcoholism as a public health issue and working conditions.
Law No. 18.256 (2008)	Tobacco control — reference for smoke-free workplaces.
ILO Convention No. 155	Worker safety and health: employer's obligation to ensure safe working environments.
Law No. 16.074	Work accidents — substance use may affect BSE (State Insurance Bank) coverage.
MSP Occupational Health Standards	Guidelines for prevention programs in the workplace.

**IMPORTANT:** In Uruguay, Law 19.172 legalized cannabis for adult recreational use, however Decree 120/014 expressly establishes that use in the workplace is prohibited and may result in disciplinary action, as may reporting to work under its effects.

## 5. DEFINITIONS

**Psychoactive substance:** Any substance that, when consumed, alters the functions of the central nervous system, affecting mood, perception, cognition or behavior. Includes alcohol, cannabis, cocaine, stimulants, benzodiazepines, opioids and others.

**Alcohol:** Beverage containing ethanol in any concentration. Its consumption impairs motor coordination, judgment, reaction time and decision-making ability.

**Cannabis (marijuana/hashish):** Psychoactive substance derived from the Cannabis sativa plant. Legalized in Uruguay for adult use (Law 19.172), but prohibited in the workplace. Effects include altered perception, slowed reflexes and cognitive impairment.

**Other illegal drugs:** Any substance not authorized under current legislation: cocaine, crack/paste, ecstasy (MDMA), hallucinogens, heroin, among others.

**Psychoactive prescription medication:** Legally prescribed medications that may affect an employee's capabilities (benzodiazepines, opioids, antihistamines, etc.).

**Problematic use:** A pattern of substance use that generates negative consequences for physical or mental health, social relationships or work performance. Includes abuse and dependency.

**State of intoxication / under the influence:** A condition in which a person shows observable signs of having consumed a psychoactive substance: altered speech, coordination, balance, attention or behavior.

**Blood alcohol content (BAC):** Concentration of alcohol in the blood, expressed in grams per liter (g/L) or milligrams per 100 milliliters. The legal driving limit in Uruguay is 0.3 g/L; in the workplace, any detectable level may be relevant depending on the employee's role.

## 6. GUIDING PRINCIPLES

**Health as a Priority:** Problematic substance use is treated primarily as a health issue, not exclusively as a disciplinary matter.

**Safety:** Protecting the physical integrity of all employees, clients and third parties is a non-negotiable value.

**Non-Stigmatization:** Discrimination or stigma toward people with consumption problems is avoided, encouraging help-seeking.

**Confidentiality:** Information regarding an employee's substance use or treatment is strictly confidential.

**Proportionality:** Measures adopted are proportional to the severity and circumstances of each situation.

**Individual Responsibility:** Each employee is responsible for reporting to work in conditions fit to perform their duties safely.

**Preventive Approach:** The company prioritizes prevention and early intervention over disciplinary action.

## 7. PROHIBITED CONDUCT

The following are expressly prohibited within the company:

1. Reporting to work under the influence of alcohol, cannabis or other psychoactive substances.
2. Consuming alcohol during working hours, including breaks and shared spaces on company premises.
3. Consuming cannabis, in any form, during working hours or on company premises.
4. Using illegal substances (cocaine, crack, ecstasy, etc.) at any time related to work activities.

5. Operating machinery, vehicles or hazardous equipment under the influence of any psychoactive substance.
6. Carrying, distributing, selling or facilitating any illegal substance on company premises.
7. Pressuring or offering psychoactive substances to other employees.
8. Presenting false medical certificates, prescriptions or justifications related to medication use.

**NOTE ON CANNABIS:** Although Law No. 19.172 permits adult recreational use of cannabis in Uruguay, Decree 120/014 expressly establishes that use in the workplace is prohibited and may be grounds for disciplinary action. The legality of recreational use outside work does not exempt an employee from reporting to work in a fit condition to perform their duties.

## 8. SPECIFIC HIGH-RISK SITUATIONS

The following situations are identified as higher risk, where restrictions apply with particular rigor:

Situation	Consideration
Safety-critical positions	Machine operators, vehicle drivers, staff working at heights, handlers of hazardous substances, security personnel. Zero tolerance for alcohol and substances applies to these roles.
Corporate events with alcohol	At events where the company provides alcohol (dinners, celebrations), the rules in Section 10.4 apply. Employees remain responsible for their conduct and for not driving while impaired.
Business travel and field assignments	The employee represents the company and must maintain the same standards as at the workplace.
Remote work	Even when working from home, performing professional duties requires the same standards of fitness.

## 9. RESPONSIBILITIES

### 9.1. Senior Management

- Approve and endorse the protocol.
- Allocate the resources necessary for its implementation.
- Lead by example in responsible conduct.

### 9.2. Human Resources Department

- Administer and update the protocol.
- Coordinate training and prevention campaigns.

- Manage detected cases: intervention, referral, follow-up.
- Liaise with the company medical service or relevant health provider.
- Maintain confidential case records.

### 9.3. Supervisors and Line Managers

- Observe warning signs of deterioration in their team's performance, behavior or appearance.
- Report to HR upon well-founded suspicion that an employee is under the influence of substances.
- NOT directly confront or diagnose the employee; always refer to HR.
- Not cover up substance use situations out of collegial loyalty.
- Ensure that no employee apparently under the influence operates hazardous equipment.

### 9.4. Occupational Health Physician / Medical Service

- Conduct the clinical assessment of the employee when intoxication is suspected.
- Request and/or administer detection tests.
- Issue a certificate of fitness or unfitness for work on the day.
- Advise HR on referral to specialized health services.
- Maintain strict medical confidentiality.

### 9.5. All Staff

- Report to work in a physical and mental condition fit for duty.
- Inform the occupational physician or HR if taking psychoactive prescription medications that may affect their performance.
- Cooperate with the protocol when they witness a situation.
- Be aware of the available support resources and use them if needed.

## 10. PROCEDURE UPON SUSPICION OR DETECTION IN THE WORKPLACE

### 10.1. Warning Signs

A supervisor or colleague may observe signs such as:

- Smell of alcohol or marijuana.
- Incoherent speech, slurred or unusually rapid talking.
- Poor motor coordination, stumbling or trembling.
- Bloodshot eyes or abnormally dilated or constricted pupils.
- Agitated, aggressive, euphoric or excessively lethargic behavior.
- Noticeably lower-than-usual performance.
- Accidents or incidents with no apparent cause.

## 10.2. Steps to Follow

**Step 1 — Discreet observation:** The supervisor observes the situation without public confrontation. If signs are evident, they act immediately.

**Step 2 — Removal from risk position:** The employee is discreetly removed from any task involving risk to themselves or others (machine operation, driving, etc.), without creating a scene.

**Step 3 — Notification to HR:** The supervisor immediately and confidentially notifies HR or the on-duty manager.

**Step 4 — Medical assessment:** HR refers the employee to the medical service for a clinical assessment and, if warranted, a detection test. The employee must accompany the medical officer.

**Step 5 — Decision for the day:** Based on the assessment result: (a) If intoxication is confirmed: the employee may not continue working. Safe transport home will be arranged. They will not be allowed to drive. (b) If not confirmed: the employee may return to their duties.

**Step 6 — Documentation:** HR documents the incident in the confidential record. A file is opened if disciplinary proceedings are warranted.

**Step 7 — Follow-up:** HR schedules a meeting with the employee for the following day to assess the situation and inform them of available support resources.

## 10.3. Employee Transportation

Under no circumstances will an employee who appears to be under the influence be allowed to drive home. The company will facilitate:

- Contacting a family member or trusted person of the employee.
- Arranging transportation (cab, ride-share service).
- In cases of medical emergency: calling SIATE (105) or transferring to the appropriate health center.

## 10.4. Corporate Events Involving Alcohol

At events where the company provides alcoholic beverages:

- Non-alcoholic alternatives will always be available.
- The quantity of alcohol available per person will be limited.
- Return transportation will be arranged for participants (or participants will be informed in advance that driving is not permitted).
- No employee driving company vehicles may consume alcohol.
- The event supervisor or manager may intervene if excessive consumption is observed.

## 11. DETECTION TESTING (BREATHALYZER AND DRUG TESTS)

### 11.1. Types of Test

Test Type	Substances Detected	When Applied
Breathalyzer	Alcohol	Upon well-founded suspicion or for safety-critical positions.
Rapid urine / saliva test	Cannabis, cocaine, opioids, amphetamines	Upon well-founded suspicion.
Blood test (laboratory)	Confirmation of positive results	To confirm a positive rapid test result.

### 11.2. Conditions for Testing

- Tests will be conducted exclusively with the employee's informed consent, except where current regulations or internal rules establish otherwise for safety-critical positions.
- The test will be administered by the occupational physician or authorized health personnel, guaranteeing the employee's dignity.
- Results are confidential and communicated only to the employee and HR.
- The employee has the right to request a second test (counter-sample) upon a positive result.
- A positive result does not automatically trigger disciplinary action; it initiates the procedure set out in Section 10.

### 11.3. Reference Levels — Alcohol

BAC Level	Situation	Action
0.0 g/L	Safety-critical positions (drivers, machine operators)	Zero tolerance. Any positive level activates the protocol.
0.0 – 0.3 g/L	General staff	Documented. Conversation with the employee.
> 0.3 g/L	All staff	Employee is removed from their position. May not drive. Disciplinary process initiated.
> 0.5 g/L	All staff	Severe intoxication. Transfer to health center is evaluated.

## 12. EMPLOYEE ASSISTANCE AND REHABILITATION PROGRAM

The company recognizes that problematic substance use may be a treatable condition and offers a support framework for employees who need it:

### 12.1. Voluntary Access

- Any employee may confidentially request assistance from HR or the occupational physician, without this generating disciplinary consequences in itself.
- The company will facilitate referral to Portal Amarillo services (ASSE), health mutuals, or addiction specialists.
- An employee undergoing treatment may request adjustments to working hours or arrangements, subject to assessment by HR and management.

### 12.2. Referral Through the Protocol

- When a case is detected under Section 10, HR will offer the employee access to support services as an alternative or complement to disciplinary proceedings.
- Enrollment in an assistance program will be considered a mitigating factor in the disciplinary assessment, provided the employee complies with the treatment.
- Regular follow-up meetings will be held between HR, the occupational physician and the employee.

### 12.3. Available Resources in Uruguay

Resource	Contact
Portal Amarillo (ASSE) — National Drug Reference Center	Tel: 2204.7272   portalama.org.uy
JND Helpline (National Drug Secretariat)	Tel: 0800 8888 (free of charge)
ASSE — Primary Care Network	asse.com.uy
Employee health mutual (FONASA coverage)	According to coverage plan
Alcoholics Anonymous Uruguay	aauruguay.org.uy
Al-Anon Uruguay (family support)	alanon.org.uy
Narcotics Anonymous Uruguay	nacionuy.org
SIATE / SAME (medical emergencies)	Tel: 105

## 13. SANCTIONS

Sanctions are applied proportionally to the severity of the conduct and the circumstances. Voluntary participation in an assistance program is a mitigating factor.

Severity	Conduct / Situation	Sanction
Minor	First detection of alcohol smell with no work impact. Alcohol consumed outside working hours causing minor disruption.	Verbal or written warning. Referral to occupational physician.

Moderate	Reporting under mild influence of alcohol or cannabis. Repeated non-compliance with protocol rules. Unjustified refusal to undergo detection testing.	Unpaid suspension (1 to 5 days). Obligation to enroll in an assistance program.
Serious	Reporting in an obviously intoxicated state. Operating machinery or vehicles under the influence. Causing an accident while under the influence of substances. Distributing or selling illegal substances on company premises.	Dismissal for serious misconduct (without severance pay), pursuant to Article 31 of Law No. 10.489.

**Refusal to undergo detection testing when well-founded suspicion exists will be treated as equivalent to a positive result for disciplinary purposes.**

*The company may report to the competent authorities (National Police, Criminal Court) cases of possession or distribution of illegal substances in the workplace.*

#### 14. CONFIDENTIALITY

All information related to an employee's substance use, test results, treatment or disciplinary process is strictly confidential. Only the employee, the occupational physician and directly involved HR personnel will have access.

Test results will not be communicated to colleagues, uninvolved supervisors or third parties, except when expressly required by a competent authority.

**Breach of the duty of confidentiality constitutes a serious disciplinary offense.**

#### 15. TRAINING AND PREVENTION

- At least one annual training session will be held for all staff on the risks of alcohol and drug use in the workplace.
- Supervisors will receive specific training in identifying warning signs and applying this protocol.
- Regular awareness campaigns (leaflets, posters, talks) will be held at company facilities.
- The protocol and available support resources will be shared on the intranet and on notice boards.
- All new employees will be briefed during the onboarding process.

#### 16. RECORDS

HR will maintain confidential records of:

- Detected cases and actions taken.
- Detection test results (kept under medical custody).
- Sanctions applied.
- Referrals to support services and follow-up outcomes.
- Training sessions conducted (attendance lists).

Records will be retained for a minimum of 5 years in a secure, restricted-access location, in compliance with Law No. 18.331 on Personal Data Protection.

## **17. PROTOCOL REVIEW**

This protocol will be reviewed:

- At least annually.
- When relevant regulatory changes occur (particularly regarding cannabis legislation).
- Following significant substance-related incidents.

The review will be led by HR with participation of Management and the occupational physician.

## **18. ANNEXES**

**ANNEX I — INCIDENT REGISTRATION FORM**

File No.: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Recorded by (HR / Supervisor): \_\_\_\_\_

**Full name of employee involved:** \_\_\_\_\_

**Position / Department:** \_\_\_\_\_

**Shift / Regular working hours:** \_\_\_\_\_

**Name of reporting supervisor:** \_\_\_\_\_

Description of observed signs or behavior:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Substance presumably involved (check all that apply):

Alcohol    Cannabis    Cocaine / Crack    Other: \_\_\_\_\_

Was a medical assessment requested?  Yes    No   Reason if No:

\_\_\_\_\_

Was a detection test conducted?  Yes    No   Result: \_\_\_\_\_

Was the employee removed from their position?  Yes    No

How was the employee transported home?  Family member    Cab/Ride-share    Own vehicle    Not applicable

Supervisor signature: \_\_\_\_\_ HR signature:

\_\_\_\_\_

**ANNEX II — DETECTION TEST RECORD**

File No.: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Medical officer / Health personnel: \_\_\_\_\_

Employee: \_\_\_\_\_ ID No.: \_\_\_\_\_

Position: \_\_\_\_\_ Department: \_\_\_\_\_

Type of test performed:

- Breathalyzer     Rapid urine/saliva test     Blood test (laboratory)

Result:

- NEGATIVE     POSITIVE — Substance/level detected:

\_\_\_\_\_

Employee consent:

- The employee provided informed consent for the test.  
 The employee refused to undergo the test.

Medical officer's clinical observations:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Conclusion:  Fit to continue working     Unfit to continue working on this day

Medical officer signature: \_\_\_\_\_ License No.: \_\_\_\_\_

\_\_\_\_\_

Employee signature: \_\_\_\_\_ Full name:  
\_\_\_\_\_

**ANNEX III — PROTOCOL ACKNOWLEDGMENT FORM**

I, the undersigned:

Full name: \_\_\_\_\_

ID No.: \_\_\_\_\_ Position: \_\_\_\_\_

Department: \_\_\_\_\_ Start date: \_\_\_\_\_

Hereby declare that I have received, read and understood the Alcohol, Cannabis and Drug Use Prevention and Management Protocol of [COMPANY NAME], in its current version.

I commit to complying with its provisions and understand that non-compliance may result in disciplinary action.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Full name: \_\_\_\_\_

## ANNEX IV — SUPPORT RESOURCES IN URUGUAY

Resource	Description	Contact
Portal Amarillo (ASSE)	National Drug Reference Center. Outpatient treatment and inpatient services.	Tel: 2204.7272 portalama.org.uy
JND — National Drug Secretariat	Free and confidential helpline.	Tel: 0800 8888 (free)
ASSE — Health Network	Primary care and specialist referral.	asse.com.uy
Alcoholics Anonymous Uruguay	Support groups for people with alcohol problems.	aauruguay.org.uy
AI-Anon Uruguay	Support for family members of people with alcohol issues.	alanon.org.uy
Narcotics Anonymous Uruguay	Support groups for people with drug addiction.	nacionuy.org
SIATE / SAME	Medical emergencies.	Tel: 105