



2020 Substance Misuse Policy

This document outlines the Site Work Consulting policy regarding Substance Misuse and the Company's Code of Business Conduct, which states:

'In order for us all to work safely, effectively and productively, to remain alert and responsive to instruction and be aware of the consequences of our actions, Site Work Consulting policy is to maintain a drug and alcohol-free workplace'.

It further expands this by stating that inappropriate conduct includes:

'Possess, distribute or use illegal drugs, or use legal drugs or alcohol inappropriately'.

This Procedure sets out a common framework for the implementation of local practices in respect of substance misuse designed to ensure that the Procedure is followed. It is recognised that there may be a need for some flexibility within different geographies and businesses on how this framework is implemented. Where specific geography/business needs require supplementary detail, this will be documented by way of an appendix to this Procedure.

Who this Procedure applies to

This Procedure applies to all Site Work Consulting employees directly employed by the businesses and any other workers' under Site Work Consulting management control. Accordingly, the principles of this Procedure apply to workers employed by agencies or other third party companies and Site Work Consulting reserves the right to terminate a contract in the event of a breach of these principles.

Where Site Work Consulting workers' are working on client sites, and as a result are subject to client procedures in relation to substance abuse, these will be in addition to this Procedure which will still be applied to any extent necessary.

Site Work Consulting will require that subcontractors working on sites under Site Work Consulting control apply these or equally stringent procedures in relation to their employees.

Responsibility for this Procedure

Responsibility for the development, review and maintenance of this Procedure is shared between the Human Resources and HSSE functions. This Procedure may be reviewed and amended from time to time.

Procedure

1 Introduction

The misuse of alcohol, drugs and other substances (e.g. solvents) in the workplace is everyone's concern at Site Work Consulting. Not only can it damage the user's health and increase the risk of accidents in both the working environment and outside of work, it can also affect our company's future success through increased absenteeism, poor performance and decision making. It may also increase the likelihood of inappropriate behaviour towards other Site Work Consulting employees, customers and third parties.

The purpose of this Procedure is to prevent misuse. Accordingly it is our commitment to support those people who have substance misuse problems, wherever we can. Through this Procedure we will ensure that we have in place support systems which are designed to assist in coping with misuse issues as well as raising awareness of misuse issues. Notwithstanding this, employees are expected to comply with the requirements of this Procedure and the Code of Business Conduct and the specific expectations in work-related situations as set out below.

This Procedure has set out clear standards to be adopted across Site Work Consulting; it does not contain the specific procedure to be adopted as this will need to reflect both individual business and local legal requirements.

2 Expectations of Site Work Consulting Employees

2.1 While at work

Site Work Consulting employees at work on Site Work Consulting facilities, locations office or work sites are prohibited from:

- Using illegal drugs in any circumstances;
- Using legal drugs or substances (e.g. solvents) in an unauthorised manner;
- Consuming alcohol;
- Reporting to work under the influence of alcohol, illegal drugs, or legal drugs used in an unauthorised manner;
- Testing positive for drugs or alcohol (where testing regimes are in use) and/or tampering with any testing process/procedure;
- Possession, ingestion, injection, inhalation, control, purchase, sale, transportation, or distribution¹ of illegal drugs, drug paraphernalia, alcohol, or alcohol products.

Failure in any of the above prohibitions will be deemed to have breached the Procedure and will be subject to the appropriate action in accordance with Site Work Consulting disciplinary

¹ With the exception of the distribution of alcohol related gifts or beverages where this is part of a special occasion and with the consent of senior management.

procedure (or in the case of non-direct employees, in accordance with their conditions of contract). This may result in termination of employment or contractual services even for the first offence.

2.2 Company business

Workers on Company business outside of Company premises, who are not on call, may consume alcohol where this is included as part of corporate hospitality given to or received from clients. In attending such events the worker must adopt a responsible attitude to drink / driving.

Workers who have, while on company business as set out above, consumed alcohol in excess of the amount permitted under the local legal drink/drive limit, must not thereafter:

- return to their normal place of work;
- enter any premises or workplace under the control of the company or any client workplace or premises;
- be on call or offer themselves to assist in any work related activity;
- attempt to drive any vehicle until such time as they are sure that they are compliant with company policy by no longer being under the influence of alcohol and are no longer in contravention of the local legal limits

Internal company events

The above will also apply to workers when attending official events organised or sponsored by the company providing they have been approved by a Directors/Senior manager. Managers will give due consideration to the timings of such events particularly if employees are expected to work the next day.

2.3 Prescribed medications

Employee should advise their doctor or pharmacist of the nature of their work and ascertain, as far as possible, whether as a result of taking prescribed drugs or purchased medication, there could be side-effects which may affect their work performance and thereby endanger themselves and any other person.

Employees must advise their Manager if taking prescribed medication which is likely to affect their work performance and thereby endanger themselves and others. All prescribed drugs brought into the workplace must be retained in their original containers with labels. All information will be kept confidential and Site Work Consulting will discipline any breach of privacy or confidentiality.

2.4 Seeking help advice and support

Employees should consult their Manager and/or Human Resources Advisor if they have or believe they may be developing a drug or alcohol-related problem. The company can then arrange support to help deal with the problem.

3 Expectations of Company Business Units

3.1 Management system

Site Work Consulting will make suitable arrangements to ensure that all procedure requirements are systematically implemented throughout the business. The system shall ensure that Site Work Consulting is in compliance with all local legal requirements.

3.2 Pre-employment and random testing

Site Work Consulting will implement drug and alcohol misuse pre-screening and random testing programmes where there is:

- Local legal or client requirements to do so
- Industrial standards and best practice advocating their use (e.g. post incident)
- Safety critical work (and where local legal requirements do not expressly prohibit testing)

Site Work Consulting will put in place clear testing programmes which are fair and seek to uphold the employee's confidentiality and comply with local legal/operational and contractual requirements.

3.3 Procedure and awareness

Site Work Consulting will make suitable arrangements to ensure that all employees are made aware of this Procedure, its contents, and the implications of any breach of the Procedure. In particular, these should set out the disciplinary procedures to be followed and sanctions, up to and including dismissal, which will apply if employees are found to be in contravention of the Procedure.

3.4 Support service provisions

Site Work Consulting will provide suitable arrangement to raise misuse awareness and to support employees with misuse issues (e.g. counselling services through Employee Assistance Programmes).

Tracey Vasko – Director

Glossary & definitions

Alcohol

Any beverage, mixture, or preparation containing alcohol (e.g. beer, wine and spirits) or other drinks capable of causing intoxication

Drug

Any substance that may impair mental activities or motor function

Safety critical work

Any occupation which presents a clear, significant life threatening risk to individuals, fellow workers, or the general public and/or is performed in such a manner or location which presents significant risk requiring exercise of a high degree of judgement and/or caution

Under the influence

Having actual or potentially impaired mental activities or motor function as a result of (alcohol etc.) In the case of Safety Critical work, the presence of any alcohol etc. in the body may have such an effect. Otherwise, being over the country or local legal drink/drive limit (or equivalent limit for other substance) will be taken to indicate that the individual is under the influence.