

HRS Group UK Drug and Alcohol Policy

1.0 Introduction

The HRS Group UK Policy on Alcohol and Drugs is a fundamental part of the Company's strategy to safeguard the health, safety and welfare of all its employees.

Alcohol and drug consumption/dependency affects individual health and work performance in terms of safety, efficiency, productivity and attendance. In addition, it can have a detrimental effect on colleagues and dependants. As a responsible employer, HRS Group UK recognises the need to take measures to address the issue of alcohol and drugs in the workplace. This Policy has been developed to protect the health and safety of workers and to comply with relevant legislation. e.g. Health and Safety at Work etc. Act 1974 and Misuse of Drugs Act 1971.

This Policy, including guidelines in relation to alcohol and drugs, and its purpose is to achieve the following:-

- To have a working environment free from the effects of alcohol and drugs;
- To encourage employees who suspect or know they have an alcohol or drug-related problem to seek help voluntarily and provide assistance to these employees to overcome their problem;
- To reduce the personal suffering of employees with alcohol or drug-related problems and their dependants;
- To provide practical guidance on how to deal with alcohol or drug-related problems effectively;
- To promote a climate which will reduce the tendency to conceal or deny alcohol or drug-related problems by enhancing awareness; and to provide a supportive framework for employees who come forward with an alcohol and drugs dependency issue.

In addition to employees, other persons working for or on behalf of HRS Group UK are required to be aware of and comply with this Policy. It should be noted however that the disciplinary or support provisions contained in this Policy only apply to employees of HRS Group UK. For more information, refer to the section 'Agency workers, Consultants and Contractors' contained within this Policy.

2.0 Definitions

For the purposes of this Policy:

'Alcohol' is defined as a beverage, condiment or food additive which contains alcohol in any form. An 'alcohol-related problem' is defined as any consumption of alcohol which interferes with an employee's health, safety, welfare and performance in any aspect of

employment.' Drugs' are defined as illegal substances, prescribed and over-the-counter medications. A 'drug-related problem' is defined as any use of drugs, or substances which in themselves are legal but may be subject to abuse such as glue or solvents, which interferes with a employee's health, safety, welfare and performance in any aspect of employment.

3.0 Obligations of Employees

Employees are required to be aware of and comply with this Policy to ensure that their performance or ability to carry out their activities at work safely and competently is not impaired in any way. All employees should observe the following, and note that failure to do so may result in disciplinary action being taken.

All employees engaged in normal work activity or on scheduled/agreed duty cover either at home or elsewhere are subject to the Policy in full for the duration of the periods of duty. The limit for alcohol set by this Policy is in line with the Government's legal drink/drive limit, as amended from time to time.

The current limit, as at the date of this Policy, is set at 107 milligrams of alcohol per 100 ml of urine, 35 micrograms of alcohol per 100 ml of breath, or 80 milligrams of alcohol per 100 ml of blood. In the case of drugs the threshold levels are determined in accordance with established legal and medical practice. Consumption, possession or sale of illegal drugs is prohibited, and the Company take a zero tolerance approach. Possession and sale are also criminal offences under the Misuse of Drugs Act 1971.

Specifically this means:-

- a) Employees must not present themselves for work under the influence of alcohol or drugs so that their performance or ability to carry out their activities at work safely and competently is impaired in any way.
- b) Consumption of alcohol or drugs during normal working hours or at any time on Company premises is prohibited. For clarity the normal working hours during which the policy applies includes all periods of work such as shift work, overtime and extra duty, and any period whilst waiting for work, such as between split duties. Any period of agreed standby or emergency call out duty shall be considered to be part of the normal working hours for the purposes of this Policy, and the terms of this Policy relating to working under the influence of alcohol or drugs will therefore fully apply. Periods of travelling to and from a site for the purposes of standby or emergency call out will also be treated as falling within the scope of this Policy. Please also refer to the Enforcement and Application section below for the specific provisions in relation to Breaks / Rest Periods.
- c) When representing HRS Group UK outside normal working hours, employees are expected to take a responsible attitude to alcohol and drugs. Employees should bear in mind that they are representing the Company and must not do anything to jeopardise its reputation.

- d) This Policy covers those driving any vehicle on behalf of HRS Group UK in any capacity or at any location. This Policy covers travel to and from work if it could reasonably be implied that alcohol or drugs were present outside the prescribed limits during normal working hours.
- e) Prescribed and over the counter medications are also covered by this Policy as they may cause side effects that have potential safety implications. Employees therefore have a duty to advise their pharmacist/general practitioner/medical practitioner of this Policy when being prescribed medication. On the advice of the medical practitioner, the employee must notify his or her manager about any possible impact on his/her health and safety relating to his/her duties at work, so that current or alternative employment can be considered whilst he/she is being prescribed medication. The manager may in turn seek advice from an appropriate external agency. Any employee engaged on safety critical tasks might require to be provided with alternative work during the period of medical treatment.
- f) Employees or other persons obtaining treatment or medicines for themselves should be aware of the conditions and side effects notified and seek out alternatives that do not impair performance through drowsiness or other symptoms.
- g) Any visitor who is attending the Company's premises or site for business reasons shall be required to comply with this Policy and should be asked to leave the premises or site if they are acting in a manner likely to cause a breach of this Policy. Other members of the general public, for example, in their capacity as customers or clients, should be asked to leave if their behaviour indicates that they may be under the influence of alcohol and/or drugs.

4.0 Enforcement and Application

The general principle adopted by HRS Group UK is to have an environment free from the effects of drugs and alcohol. It is the responsibility of all managers to enforce this Policy, regardless of whether or not they are the line manager in a given situation. Normally, however, the enforcement of this Policy will be a line management responsibility.

For clarity the application of this Policy in relation to four specific circumstances is outlined below:

4.1 Breaks/Rest Periods

Alcohol may be consumed off site but workers must remember that they will be returning to work and will be subject to the limits for the presence of alcohol and drugs set out in this Policy. Alcohol will not be served and may not be consumed on business premises or sites at any time including any breaks, rest periods or after working hours. Managers should be aware of the limits and observe any abnormal or unusual behaviour after breaks, which may indicate abuse of this Policy.

4.2 Hospitality and Entertainment

Where employees are involved in corporate hospitality or entertainment of customers, suppliers or other visitors outside of working hours, they are expected to take a responsible attitude to alcohol and drugs.

Employees should remember that they may be returning to work and will be subject to the limits for the presence of alcohol and drugs set out in this Policy. Organisers of events should give clear guidelines to both attendees and employees on the application of this Policy. Where the hospitality / entertainment has been provided by the Company to external contacts / customers / suppliers, all employees in attendance must observe the terms of the Policy during normal working hours. Where an employee has accepted a hospitality invite, and is not taking annual leave, the terms of the Policy must be complied with during normal working hours.

4.3 Conferences, Off – Site Meetings and Training Courses

The terms of this Policy relating to the consumption of alcohol and use of drugs apply during the normal working period of any conference, off – site meeting or training course. They do not apply out-with this period except where work continues into the night or some other extended period. It is expected that a responsible approach will be taken by all concerned. Employees should remember that they may be returning to work and will be subject to the limits for the presence of alcohol and drugs set out in this Policy.

4.4 Birthdays, Retirement Celebrations and other special occasions

If alcohol is involved such events should take place away from business premises and outside working hours.

5.0 Support for Employees

HRS Group UK is committed to providing appropriate professional help and support to employees who suspect or know they have an alcohol or drug-related problem and who seek help via a recognised external agency. This is applicable to employees only. It should be noted that help and support as outlined below will not be provided for any employee who has been involved in any accident or other situation.

- where treatment, rehabilitation or counselling requires absence from work
- where consideration is required of a change in the employee's duties or working conditions; or
- where the extent of the alcohol or drug-related problem may have an impact on performance or
- health and safety at work.

Time off during normal working hours will be granted where treatment, rehabilitation or counselling is required. If the employee cooperates with this programme then employment rights and benefits will normally be protected during this period.

If an employee is absent from work they will be entitled to return to or remain in the same job unless there are justifiable reasons for not doing so. In that event, consideration will be given to finding suitable alternative employment.

It is the responsibility of the employee's manager, in conjunction with advice from an appropriate external agency, to determine a time frame for an employee to achieve a sustained improvement. A period of 3 months is often appropriate. Employees will be required to comply with an agreed programme of support during this time.

6.0 Performance Relating to Alcohol and Drugs

Where an employee's health, attendance or work performance is affected by an alcohol or drug related problem, he or she will be dealt with under the relevant procedures for managing performance or attendance. Should it transpire that the employee's unsatisfactory attendance or work performance is related to an alcohol or drug related problem, he or she will be advised to contact their Manager and an appropriate external agency to seek assistance in dealing with that problem. It is the responsibility of the employee's manager, to determine a time frame for an employee to achieve a sustained improvement. A period of 3 months is often appropriate

Should an employee's health, attendance or work performance continue to be affected and unsatisfactory, further stages of the relevant procedure for management of performance or attendance will be followed and these could ultimately lead to dismissal.

7.0 Misconduct Relating to Alcohol and Drugs

Misconduct related to consumption of alcohol or drugs is normally dealt with under the Company's Disciplinary Procedure and acts of gross misconduct may result in the penalty of summary dismissal unless the circumstances in which the misconduct is committed are considered to justify a reduced penalty.

In these circumstances, if the employee is thought to be unfit for work, he or she may be suspended from their duties whilst any investigations take place, to minimise danger to themselves, other employees and customers.

Employees whose alcohol or drug-related problem comes to light in the course of disciplinary proceedings should be aware that the admission of dependency may be a mitigating factor but will not necessarily result in the suspension of disciplinary action. All cases will be dealt with in the light of prevailing circumstances.

The possession or trafficking of any drugs declared to be illegal within the jurisdiction in which they are discovered is in breach of the Code of Conduct and Disciplinary Rules. In such instances the employee should be detained where possible by the designated person responsible for security, or a responsible manager as appropriate, whilst the police are notified. Any line manager who believes that an employee or other person is contravening this section should immediately report the circumstances to an appropriate senior manager, and prepare a written report. Any employee found to be in possession, to have been in possession or to have been trafficking illegal drugs may be dismissed.

8.0 Agency Workers, Consultants and Contractors

Contractors, consultants and employers of agency workers are required to comply with the policy on Alcohol and Drugs.

It should be noted however that the support available to employees which is detailed in this policy is applicable to employees only. Agency workers and contractors should be referred to their employing agency or company and dealt with in accordance with their contract.

Where an agency worker's, consultant's or a contractor's health, attendance or work performance is affected by an alcohol or drug related problem, the employing agency or company should be notified and the individual's services terminated in accordance with the terms of the specific contract.

Misconduct of an agency worker, consultant or contractor should be referred to the employing agency or company (where applicable), and if appropriate the individual's services should be terminated subject to the terms of the contract.

9.0 Responsibilities

9.1 Health & Safety Department

The Health & Safety Team is responsible for the maintenance and review of the Policy on Alcohol and Drugs on behalf of the Board of Directors of HRS Group UK. This Policy will be reviewed to ensure its effectiveness and any changes arising from this review will be communicated to employees, their representatives, suppliers and other parties.

9.2 Managers

Managers are responsible for the day-to-day implementation of this Policy and for dealing with issues which arise and are related to alcohol or drug use. They are responsible for ensuring all staff, contractors, agency personnel and visitors with which they may be involved are aware of this Policy.

9.3 Employees

This Policy applies to all employees of HRS Group UK. Employees are also responsible for ensuring any visitors to the Company premises are advised of their obligations.

An equivalent Policy on Alcohol & Drugs will be a standard requirement in all contracts for the supply of labour and contracting companies and agencies will be required to confirm that their own Policy on Alcohol & Drugs adheres to the standards set down in this Policy.

9.4 Other Workers

Other persons working for, or on behalf of, HRS Group UK will be required to submit to alcohol and drug screening procedures at the request of a responsible HRS Group UK employee, as defined in contractual agreements.