



## Shipboard Drug and Alcohol Policy

### General Terms

The Company has a **ZERO TOLERANCE** policy regarding illegal drug use. The use, sale, possession, or distribution of illegal drugs either on Company vessels or ashore (including while on leave) is prohibited and will absolutely not be tolerated. A positive drug test will be conclusive evidence of prohibited drug use even if the actual drug use occurred while at home or otherwise prior to joining the vessel. Violation of this policy will result in **IMMEDIATE DISMISSAL** and removal from the ship at the first opportunity.

The immoderate or unauthorized use of alcohol either onboard or ashore is also prohibited if it results in a person being intoxicated onboard a Company vessel. Intoxication is determined by an Breathalyzer test which measures Blood Alcohol Content (BAC). Seafarers who are found to be intoxicated, as defined in “Alcohol Standards” Section will be relieved of all duties pending a review and determination of Disciplinary Action.

Furthermore, the consumption or possession of hard liquor onboard a Company vessel, including any alcoholic beverages other than wine or beer, is prohibited.

#### 1.1. Disciplinary Action for Intoxication

After review of the matter by the HSEQ Manager and HR Manager, the individual will be dismissed or face alternative disciplinary action. Decisions regarding appropriate disciplinary action will be made on a case-by-case basis.

#### 1.2. Drug and Alcohol Prevention Policy

The Company takes an aggressive stance on the prevention of illegal drug use, sales or possession onboard its vessels or ashore (including while on leave); and in the control of the use of alcohol onboard its vessels. This includes, but is not limited to:

- Pre-employment testing for drug and alcohol use;
- Random drug and alcohol tests of personnel onboard;
- Searches of vessels and personnel for prohibited drugs;
- Security measures to prevent the introduction of illegal drugs onboard vessels by personnel or others;
- Management controls to prevent and discourage the use or possession of illegal drugs onboard or ashore (including while on leave) and the inappropriate use of alcohol onboard Company vessels;
- Prohibiting crewmembers to possess or consume hard liquor or any alcoholic beverages (other than wine or beer) onboard any Company vessels;
- A number of medicines included in the ship's medical inventory list are controlled drugs e.g. sedatives, opiates etc. These drugs should always be locked and used only under the Master's responsibility. Illegal drugs include, but are not limited to, Heroin, Marijuana, Cocaine, Opiates, Amphetamines, Cannabis, PCP (Phencyclidine), Barbiturates, Benzodiazepines, Methadone, etc.

### 1.3. Compliance with Flag State and International Law

In addition, the Company requires full compliance by vessel personnel with all applicable laws, rules and regulations that pertain to the control and use of alcohol or drugs for the flag states of its vessels, as well as the countries within whose waters its vessels sail.

## Alcohol Standards

### 1.4. Scheduled Operations

- a) No individual shall perform, or attempt to perform, any scheduled operation within four (4) hours after consuming alcohol.
- b) No individual will consume alcohol while performing scheduled operations. "Scheduled operations" means any task assigned in advance that is related to safety or environmental protection. For example, scheduled operations include, but are not limited to:
  - Standing watch; Bunkering, Operating; repairing, or maintaining any machinery; Mooring, anchoring, or handling lines; Operating lifeboats; Participating in planned drills or exercises; Any other kind of work

### 1.5. Regulations for Consumption

- a) In order to be able to follow regulations for consumption, note following:

1 Unit should be considered as "1 can of ordinary beer (30 cl- Alcohol volume between %1-%4)" and equal to "20 mg/100 ml BAC". Moreover, human body requires at least one (1) hour for burning out of each unit alcohol that is consumed.

Also refer to below for examples of approximate alcohol unit conversions:

	Volume	Units
<b>Beers, Cider and Lagers</b>		
<b>Extra Strength</b> (>4.0% <6.0% Alc. by Vol.)	10oz. 30cl.	2.5 2.5
<b>Ordinary Strength</b> (>1.0% <4.0% Alc. by Vol.)	10oz. 30cl.	1.0 1.0
<b>Low Alcohol</b> (>0.05% <1.0% Alc. by Vol.)	10oz. 30cl.	0.5 0.5
<b>Table Wines, Others</b>		
(>6.0% <12% Alc. by Vol.)	10cl. 1 litre bottle	1.0 10.0

- b) Blood Alcohol Content (BAC) will not exceed the level of 40 mg/100 ml (2 units) at any time.
- c) Maximum permitted alcohol consumption is 2 units within 24 hours of day period and individual alcohol consumption should not exceed 12 units per week.
- d) Alcohol consumption records are to be maintained for individuals with Alcohol Consumption Record Form and regularly monitored and reviewed by the Master.
- e) Maximum Stock of Alcohol shall be controlled by the Company and Master such calculation should be made as for each crew, this should not be exceed each month to “Number of Crew x 12 unit (per week) x 4 (number of week per month)” and stock will be kept in bonded store under control of Master. No alcohol is allowed to be kept in crew cabins, any quantity of alcohol, which may found during the Master's weekly inspections, is to be arrested.
- f) It is forbidden to serve or consume alcoholic beverages in any coastal and/or confined waters, including the entire United States EEZ (200 miles offshore) or 24 hours prior to enter in territorial water whichever is greatest.
- g) Alcohol shall not be distributed or consumed at sea, during conditions of reduced visibility, heavy traffic, and narrow waters or in any other hazardous conditions, or at any time subject to the Master’s discretion.
- h) Alcohol shall not be consumed by any crewmember within territorial waters or 12 nautical miles of a coastline while the vessel is underway.
- i) No spirits/liquor stronger than 15% (alc. Vol.) will be allowed on-board vessels. Only beer and table wine within this limit may be consumed, however OCIMF and USCG regulations shall be strictly observed.
- j) The sale of alcoholic beverages on board is at the full discretion of the Master. He is in the best position to determine the propriety of sales on his vessel, as well as the levels of control necessary.
- k) No alcohol will be consumed outside mess room. During the consumption, an officer assigned by master will attend mess room, will open the alcohol bottle/can, give to consumer within permitted limits, witness the consumption and take back the empty bottle/can and record the consumption.
- l) Total alcohol ban is enforced on vessels where the local regulation so require. This ban may also be enforced while the vessel is in ports where alcohol consumption and possession is

banned by local laws (like in Saudi Arabia, Sudan), all beverages containing alcohol must be stored inside the bonded store and under customs seal. No beverages containing any quantity of alcohol must be left outside the bonded store for on board use and/or distribution purposes.

## **Drug And Alcohol Testing**

### **1.6. Pre-Employment Drug and Alcohol Testing**

The Company requires that all persons submit to a Drug Test prior to being employed. Former employees who have not been assigned to a company vessel within the previous 12 months must also be tested prior to re-assignment. Any person testing positive for illegal drugs will not be employed.

### **1.7. Alcohol Testing**

On Company vessels, there are two approved methods: Breath Alcohol Test and Blood Alcohol Test. Since it is less intrusive but equally accurate, the Breath Alcohol Test will generally be used onboard.

### **1.8. Random Drug and Alcohol Testing**

- a) All persons assigned to Company vessels, at any time, in any waters, are subject to random drug and alcohol testing. This does not include authorized guests, spouses, or children of employees who are not otherwise employed onboard in any capacity.
- b) While certain drugs (for example, marijuana) may be legal in some countries, it is company policy to maintain a drug-free workplace. The use of drugs while off the ship may result in a positive onboard drug test.
- c) The Random Drug & Alcohol Testing program is administered by the Company. The names of randomly selected candidates will be provided to the Master from the Head Office along with specific instructions for administering the tests.
- d) Unannounced on-board drug and alcohol tests are performed on-board by a qualified External Contractor following Chain of Custody procedures, every six (6) months. All seafarer in fleet are to be tested once within three years.
- e) The process for on-board drug and alcohol tests is done through urine sampling. Persons who refuse to provide a specimen, attempt to tamper with the sample, or alter the sample, will be terminated from employment with the Company and removed from the ship at the first opportunity.
- f) Medical prescriptions, over-the-counter medications, or herbal substances that could possibly affect a test result, should be disclosed to Safety Officer PRIOR TO TESTING.
- g) Crew who fail the alcohol test will be treated according to the provisions of "Disciplinary Action" Section of Company Drug and Alcohol Policy and Procedures.

- h) The person administering the test must complete and sign the Sample Collection Confirmation Form. If the form is NOT signed, then it is considered a fatal flaw in the procedure and will require recalling the crewmember to do the test collection again.
- i) A fatal flaw in a drug test can occur for a variety of reasons including the Sample Collection Confirmation forms were not signed by either the person administering the test or the crewmember, the specimen was not collected correctly, the vial was not sealed properly, or the collection device was contaminated. In these cases, it will be considered “a failure to test” and the person must be recalled to repeat the collection process for a new test.

### 1.9. Reasonable Cause Testing

Reasonable Cause arises through personal observation of a Senior Officer of a person’s unacceptable job performance or unusual behavior. Factors considered in personal observation may include, but are not limited to:

- Smell of alcohol
- Slurred speech
- Staggered walk
- Erratic or abnormal behavior

When a Senior Officer has a reasonable suspicion that the employee is in violation of the Company’s Drug and Alcohol Policy, TESTING IS REQUIRED.

### 1.10. Post-Incident Testing

All employees shall be tested for drug and alcohol use after the incident includes the following types of events:

- A maritime casualty involving: grounding, collision, flooding, fire, oil pollution, or other serious incident
- An injury to a crewmember that requires professional medical treatment beyond first aid, including an injury to a crewmember that renders him/her unfit to perform his/her routine duties
- Damage to property in excess of \$5000
- A discharge of oil into the water
- A discharge of a hazardous substance into the navigable waters, or a release of a hazardous substance into the environment whether or not it results from a maritime casualty
- Any “near miss” maritime casualty that could have resulted in the events listed above