



Principle

Clearwater DC 2001 Ltd expects its employees to attend for work in a fit and appropriate state with no impairment from the effects of alcohol and drugs. Employees who misuse drugs or alcohol [or both] may have their judgement, safety awareness and work performance adversely affected. Any such employees put themselves at risk and can also be a danger to their fellow employees, to customers and to members of the general public. The Company has a statutory duty under the Health and Safety at Work etc Act 1974 to ensure the health and safety at work of all its employees. Employees attending work in these circumstances additionally put the Company at risk commercially and may bring it into disrepute.

Scope

This policy is designed to make all employees aware of their obligations and responsibilities regarding alcohol and drugs, and to encourage any employees who may have a dependency on alcohol or drugs to seek help or advice. It sets minimum standards that are applicable to all Clearwater DC 2001 Ltd employees.

Certain Clearwater business units may need to set more stringent standards in order to meet specific legal, operational or safety requirements, including meeting standards required by our clients. Where this is the case this policy may be adapted to meet the client or business unit requirements. This policy specifically recognises and endorses the likelihood that any more stringent policies may involve use of drugs and alcohol screening, but this would only be introduced in association with appropriate consultation.

Policy

It is the express policy of Clearwater DC 2001 Ltd:

- Not to allow any employee to work within any of its offices, or at any location at which it is engaged to carry out work, whilst their performance is impaired by the misuse of alcohol or drugs.
- To require any employee taking prescription drugs which may impair performance or judgement to inform their manager. Failure to do so may be treated as drugs abuse.
- To provide training and information to employees to minimise the problems arising from drugs and alcohol abuse and to draw attention to the harmful affects on health and well being of such abuse
- Those employees who attend for work and whose efficiency, work performance or behaviour is affected due to alcohol or drugs abuse will be dealt with under the Company's disciplinary procedures. The offence will be regarded as gross misconduct and may lead to dismissal.
- To assist employees who bring to the Company's attention their dependency on alcohol or drugs and who are prepared to seek treatment to overcome the dependency.
- To reserve the right to deploy into a suitable alternative post or, if no such post is available, to suspend on full pay, any employee undergoing treatment whose normal duties are safety critical or commercially sensitive.
- Not to allow the consumption, possession or sale of illegal drugs [i.e. those subject to control under the Misuse of Drugs Act 1971 in any office or on any site under the control of



the Company. This is a criminal offence, which will be reported to the appropriate authority and may lead to prosecution. The Company regards an offence of this nature as gross misconduct and will lead to dismissal.

- Not to allow the drinking of alcohol during working activities. There are no exceptions to this rule.

Roles and Responsibilities

The effective implementation of this policy places the following responsibilities on those identified:

- **Employees** are responsible for their own compliance with the policy and are expected to seek help if they have a dependence on drugs or alcohol. In addition each employee has a responsibility for their fellow employees and are required to advise their supervisor or manager if they have any reason to suspect colleagues of attending work whilst under the affects of drugs or alcohol.
- **Managers or supervisors** are responsible for ensuring that they are aware of the requirements of the policy and for monitoring employees for whom they are responsible to ensure compliance. Managers must understand how to access support for employees seeking help in relation to drugs and alcohol abuse and must be aware of the company disciplinary policy and how to apply it in the event of breaches of this policy.
- **Managing Director** is required to consider, in consultation with the HSE function, whether there is a requirement for a more stringent policy than this one. Such a requirement is likely to arise principally from the safety critical nature of certain activities, but might also be due to other commercial considerations. Where such a requirement does arise it will be the responsibility of the Managing Director to ensure that the local policy is fit for purpose and to sign it off.
- **The Health, Safety and Environment Function** share responsibility for ensuring that the necessary support exists for all parties in the discharge of their responsibilities, e.g. training materials and access to treatment. They are also responsible for reviewing this policy at least annually.

Signed

Murray Pitcairn
Managing Director

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