



ALCOHOL, DRUGS & MEDICATION POLICY

Industrial Coating Services Limited (ICS) has a strict policy on alcohol and drugs which is compliant with Network Rail Standards NR-L1-OHS-051 Drugs and Alcohol Policy and NR-L2-OHS-00120 Testing for Drugs and Alcohol.

- No member of staff shall report for duty under the influence of alcohol or drugs
- No alcohol or drugs are allowed to be consumed whilst on duty, during breaks in the working day/shift, or when rostered on call and thus required to work on Client premises at short notice.
- No member of staff shall buy alcohol or illegal drugs whilst on duty, or bring them onto the premises, or onto Client sites.
- No alcohol or illegal drugs can be consumed at any time, whether on duty or not.
- Any employee taking medication (prescribed and non-prescribed) must report this to their Supervisor as a minimum the day before attending shift, so clarification on the effects of the medication and any required safe system of work can be implemented.

The following arrangements apply to persons who carry out work on Network Rail Managed Infrastructure and are in compliance with current rail industry standards.

Pre-appointment Testing

All new recruits who are to work on Network Rail Managed Infrastructure must pass a pre-appointment Alcohol & Drugs screen before taking the Sentinel Sponsored course. Similarly existing employees who are to work on Network Rail Managed Infrastructure must pass a pre-appointment Alcohol & Drugs screen.

Random Unannounced Testing

Sentinel Sponsored qualified staff will also be subject to random unannounced Alcohol & Drugs screening at a rate of at least 5% of Sentinel Sponsored qualified staff per year and any employee with a rail management role whilst they are employed by the Company.

Periodic Testing

In accordance with the requirements of Network Rail standard NR/L2/OHS/00120 periodic alcohol and drugs testing will be undertaken as an integral part of the routine medical examination process.

For Cause Testing

For Cause testing shall be undertaken on Sentinel Sponsored Staff where it is suspected that they may be working under the influence of drugs and alcohol.

As ICS is a contractor, work under a Principal Contractor who is in control of the site, the Company and its staff will comply with and For Cause, Post-Incident or Random Unannounced Drugs and Alcohol Testing that the Principal Contractor requires.

The Principal Contractor or any secondary sponsor is required to inform ICS of any testing conducted in ICS Sponsored Staff, informing the Sentinel Co-ordinator within one working day of the test.

The circumstances in which a request may be made for an individual to undergo a 'For Cause' Alcohol & Drugs screen consist of the following:

Behaviour

Where an individual's behaviour give either the Company or our clients, in respect of work on Network Rail Managed Infrastructure, cause to suspect that they are unfit for work due to the effects of alcohol or drugs;

Incidents

Where there are reasonable grounds to suspect that an individual has compromised safety through the consumption of alcohol or drugs.

Where an individual is requested to undergo a 'For Cause' Alcohol & Drugs screen, they will not be allowed to carry out work on Network Rail Managed Infrastructure until either a negative result is obtained or, in the case of testing after an incident, it can be demonstrated that the individual did not contribute, either through their actions or omissions, to the incident.

All Alcohol & Drug screening is carried out by an annually appointed RISQS and Network Rail approved provider.

Positive Results

Should a positive result be obtained from any Alcohol & Drugs screen which an individual has taken, that individual shall not be permitted to carry out works on Network Rail Managed Infrastructure for a minimum of five years.

Prescribed and 'Over-the-counter' Medication

There is a sole exemption to the above positive results clause which will apply should the positive result of an Alcohol & Drugs screen be caused by the presence of prescribed or over-the-counter medication for which the individual has notified the person carrying out the test prior to the test being undertaken.

All Sentinel Sponsored qualified individuals should inform the HSQE Manager when they are taking prescription or over-the-counter medication and are due to carry out works on Network Rail Managed Infrastructure so that the Company are able, in consultation with our clients, make an assessment as to whether the medication being taken will affect your work on Network Rail Managed Infrastructure.

Refusal to take a test

Where an employee refuses to take an Alcohol & Drugs screen this will be counted as a positive result and the employee will be unable to undertake work on Network Rail Managed Infrastructure for a minimum of five years.

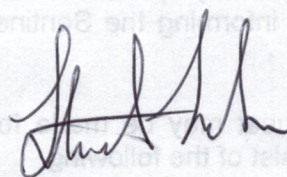
Records

All drug and alcohol test results, including refusals, shall be recorded on the Sentinel database by the medical provider.

All drugs and alcohol certificates and test results shall be maintained by the employer and medical provider for a period of not less than ten years from the date of testing.

Records of positive tests shall be retained indefinitely by the employer and medical provider.

This policy also applies to all other sectors of work and will be reviewed as part of change planning, lessons learned, knowledge transfer, post incident and annually.



Stuart Thomson, Director
January 2019