

DRUGS & ALCOHOL POLICY

Drugs, Alcohol, and the Workplace

It is in everyone's interest for the Company to maintain a healthy, safe, and productive working environment. This policy sets out the rules you must follow in relation to drugs and alcohol as an employee of Three Shires Limited (the Company).

It is especially important that you always comply with this policy as the Company considers any breach to be a serious matter. If you are found to be in breach of this policy, you may be dismissed without notice or pay in lieu of notice.

This policy is available to all personnel to view at any time in hard-copy format at Piper Hole Farm (Head Office) or in electronic format on request.

It is the understanding that for the purposes of this policy 'on-call' is considered at work, regardless of where the on-call hours are spent.

Using, possessing, selling, and supplying drugs

Apart from drugs prescribed for you, or over the counter medication (both of which must be taken as directed), you are strictly prohibited from using or possessing drugs, including 'legal highs':

- During working time.
- Whilst on company, client, or suppliers' premises (this includes vehicles).
- At lunchtime or during breaks.
- When representing the Company at business/client functions or conferences.
- When attending company organised social events outside normal working hours.

You must not sell or supply illegal drugs, prescription medication or 'legal highs' in the circumstances specified above. Furthermore, it is important to remember that if you engage in activities outside the workplace that could seriously damage our reputation; this may affect your on-going employment with us. Incidents involving the possession or use of illegal drugs on company premises will result in the authorities being notified.

Attending work under the influence of drugs

You are strictly prohibited from attending work or business functions under the influence of drugs (including 'legal highs') or solvents. It is your responsibility to ensure you attend work in an unimpaired condition.

If you are taking prescription or over the counter medication, we advise you to seek advice from your doctor or pharmacist regarding the effects this will have on you in your role and/or in the workplace. You should also have regard to any side effects or prohibited activities detailed in the instructions, such as drowsiness or advice that you should not operate heavy machinery.

You should advise the HR Manager in confidence if medication may have an impact on your health and safety or that of others. This is to enable the Company to take appropriate action where necessary. You do not have to inform the Company of what illness the medication relates to.

Attending work under the influence of alcohol

You are strictly prohibited from attending work under the influence of alcohol. It is your responsibility to ensure you attend work in an unimpaired condition. It is your responsibility to ensure that any consumption of substances in the hours prior to your shift commencing does not mean you will attend work still under the influence of those substances.

Filename:	Drugs & Alcohol Policy	Approved by:	Nicola Rudko	Issue Version:	008
Reference:	PO14	Position:	Compliance Manager	Issue Date:	April 2024
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Consuming alcohol

You are strictly prohibited from consuming alcohol:

- During working time.
- Whilst on company, client, or suppliers' premises (this includes vehicles).
- At lunchtime or during breaks.
- When representing the Company at business/client functions or conferences.

Where permission is given for alcohol to be consumed, you must demonstrate responsible behaviour and always maintain a professional image and standards. You must remember that the Company's usual code of conduct still applies. The Company will not tolerate excessive alcohol consumption or unacceptable behaviour. These rules are equally applicable to work related social events, such as Christmas parties, where prior permission is not required to consume alcohol.

If you are permitted to consume alcohol, you must ensure that you comply with relevant legislation including drink driving legislation.

Bringing alcohol into the workplace

Alcohol must not be brought onto company or client's premises (including vehicles) without the prior permission of a Director. The only exception to this is that you are permitted to bring alcohol onto our premises if it has been given as a gift from a client and you comply with the Company's gift policy.

If you are permitted to bring alcohol onto company premises it must remain sealed and out of sight of visitors.

If you have personal use of a company car, you are permitted to carry alcohol in it providing this is done in your own time and you comply with road traffic laws.

Driving whilst under the influence of alcohol or drugs

If we know or suspect that you are under the influence of alcohol or drugs, we will not permit you to drive, whether this is your own or a company vehicle. In such circumstances we will ask that you make alternative arrangements to get home and will reasonably assist you to do so, such as by ordering a taxi. Where you insist on driving, it may be necessary for us to contact the police.

If you have any questions regarding this Drug and Alcohol policy, please contact the HR Manager.

Policy on Testing for Drugs and Alcohol

The Company has a policy of conducting drug and alcohol testing which is applicable to all employees. We consider employees being under the influence of drugs or alcohol in the workplace, or during working time, to be a profoundly serious matter.

This policy outlines what a positive test for drugs and/or alcohol is, the circumstances in which the Company may conduct testing and the type of testing that will be used.

We must advise you that if you test positive for drugs and/or alcohol you may be dismissed without notice or pay in lieu of notice.

You may also be dismissed without notice or pay in lieu of notice if you fail to comply with testing procedures or refuse to undergo a drug or alcohol test.

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Testing positive for drugs and/or alcohol

A positive test result is where:

- You have a blood alcohol level that exceeds the legal drink drive limit of 80mg/dl of blood.
- You test positive for illegal drugs.
- The level of prescription medication in your body exceeds that which has been prescribed for you.
- The level of over-the-counter medication in your body exceeds the recommended dose.
- You test positive for solvents.

The above is a non-exhaustive list.

When testing may be conducted

- ***Accident / incident testing***

Where there has been an accident/incident, as part of our accident investigation procedure, we may ask you to undergo drug and alcohol testing.

Whilst we are not limited to conducting testing only in the circumstances below, they are examples of when we foresee conducting such testing.

Where an accident or incident involves the use of:

- Any mechanical handling equipment.
- Company vehicles (e.g., pallet truck, forklift truck, company car etc.).

- ***For cause testing***

You will be asked to undergo drug/alcohol testing where we have reasonable suspicion that you may be under the influence of drugs or alcohol, or we have cause to test you for this. Circumstances where this may occur include:

- Abnormal behaviour (e.g., aggression, euphoria, hyperactivity or lethargy and tiredness) for that person.
- Difficulty in walking or performing manual functions normally.
- Incoherent or slurred speech.
- Smell of alcohol.
- Bruising and/or injection marks or obvious changes in pupil size.
- Third party observations from employees, contractors, visitors etc.
- Discovery of illegal substances or empty alcohol containers on company /customer property.

The above is not an exhaustive list of circumstances in which you may be tested for alcohol and/or drugs.

- ***Random testing***

Random testing will be used to detect use of alcohol and/or drugs. This will occur at irregular intervals throughout the year as designated by management.

A minimum of 20% of Safety Critical staff will be tested in a twelve-month period in accordance with Company Standard NR/L2/OHS/00120.

The selection will be made at random by senior Management.

Personnel who have been identified by a medical professional as needing support with a drug or alcohol problem will be subject to random testing as per this policy, regardless of whether they have tested positive previously.

- ***Testing on client sites***

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If you attend or work on a client's site, you may be subject to drug and alcohol screening as a part of the client's own drugs and alcohol policy. Company employees are expected to cooperate with this.

- **Return to duty testing**

A drug or alcohol test shall be conducted when personnel have violated the Three Shires zero-tolerance policy and has returned to work following a period of absence for rehabilitation. Personnel will not be permitted to return to safety critical roles until a negative result on testing has been achieved.

Refusal to take test

An employee refusing to be tested under the provisions of this policy may be subject to disciplinary action under the Company's disciplinary procedures, up to and including dismissal. The procedure may be waived if the employee has a good medical reason for refusal. Other reasons which are not medically related will not be accepted and the employee will be required to take the test.

Positive results

Employees will be informed of their test results by HR. Employees who have tested positive may be subject to action under the Company's disciplinary procedure, up to and including dismissal.

The Company will consider whether a further test may be of assistance, however, this will depend on the circumstances. If the length of time which has passed since the first test is of such a duration that it is likely that any evidence of alcohol or drug use may have disappeared, a further test will be deemed unhelpful.

Follow-up testing

If you are undergoing treatment or rehabilitation for drugs or alcohol, you should be aware that substance abuse testing may be necessary to check progress and compliance.

How testing will be conducted

The method we will use to test for alcohol is breath, saliva and/or urine. The method we will use to test for drugs is saliva and/or urine.

On-site testing will be conducted by an external provider who is specially trained to conduct workplace drug and alcohol testing, or senior managers who have received appropriate training.

Before any tests take place, you will be asked if you consent to undergoing testing. Drug and alcohol tests will take place in a private location such as a manager's office where saliva tests are used.

Prescribed medication

The policy does not stop employees from using prescribed medication, over-the-counter medication, or herbal remedies. However, medication such as tranquillisers, sleeping pills, painkillers, decongestants, cough suppressants, antihistamines (for treatment of hay fever or other allergies) and antidepressants can make people feel drowsy and may affect their work performance or the safety of themselves or others.

If an employee is taking any medication, they should:

- check the possible side effects with their doctor or pharmacist and
- let their line manager know, in confidence, that they are taking medication and the possible side effects. Their line manager will, if necessary, make alternative arrangements for them.
- ensure the company is made aware of what over the counter medication is being taken, for what reason and for how long along with any potential side effects

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Specific Requirements for PTS Sponsored Personnel

Should any PTS Sponsored personnel fail a drugs or alcohol test they will not be permitted to work on the rail infrastructure for a minimum of 5 years regardless of the outcome of any disciplinary measures undertaken by Threeshires regarding the test results.

Assistance

If an employee comes forward voluntarily and seeks help for an alcohol or drug problem, they will be given help and support by the Company. If an employee thinks they have a problem and may be violating this policy as a result, the Company strongly encourages them to come forward and seek help. The Company will be sympathetic and ensure the employee gets the help and support they need which may include direction to external specialists. If an employee volunteer's information to the Company that they have an alcohol or drug problem, they will be always treated with dignity.

Any discussions will be in the strictest of confidence.

The Company recognises that employees may continue to struggle with alcohol or drug dependency even after they have sought and are receiving assistance. The Company will make every effort to provide ongoing support to employees.

Absence

If employees are absent from work due to their attendance for treatment in relation to alcohol or drug abuse, that absence will be treated as normal sickness absence.

Formal procedures

Whilst the Company will be sympathetic to employees who are experiencing difficulties with alcohol and drugs, it may be appropriate to implement a disciplinary or capability procedure as appropriate where conduct or performance is not satisfactory, which could result in termination of employment.

Criminal activity in the workplace involving drugs will, in every case, require the Company to alert the police.

If you have any questions about this policy, please speak to the HR Manager.

Signed

Print James Lloyd
Position Managing Director

Date 29th April 2024

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