

DRUG AND ALCOHOL POLICY

The Company's policy is that no officer, crew member, contractor or shore-based representative on any vessel that the Company manages or operates, will navigate the vessel, operate its onboard equipment or conduct business onboard, whilst under the influence of drugs or alcohol.

The Company has implemented a "zero tolerance policy" in the use and/or trafficking of internationally controlled substances and alcohol abuse, for both shipboard and shore-based personnel.

All shipboard and shore-based personnel are required to be in a condition to respond, at any time, to an emergency situation, while on duty. The misuse of legitimate drugs or the use, possession, distribution and/or sale of illicit or unprescribed drugs onboard or ashore, is strictly prohibited. Any use of a controlled substance which causes or contributes to unacceptable job performance or unusual job behaviour, is also prohibited.

A person is considered under the influence of alcohol and his/her performance impaired, when he/she has a blood alcohol content of 40mg/100ml, or greater. The Company requires a period of abstinence from alcohol to be exercised prior to any scheduled watchkeeping duties or work periods, as per Company Drugs and Alcohol procedures.

All sea-going personnel, onboard contractors and shore-based personnel shall sign a declaration of acceptance of the Company's drug and alcohol policy. All sea-going personnel employed by the Company must undergo a drugs and alcohol screening test and pass it, before signing on.

Random and unannounced testing for use of banned substances and misuse of alcohol is regularly performed onboard all Company managed vessels, to monitor compliance with this policy.

If it is determined that a Company employee, onboard or ashore, has or is abusing controlled substances or alcohol, his/her employment will be terminated.

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