#

**ECC-VECO**

**ALCOHOL AND DRUG POLICY**

**Short profile**

1. ECC-VECO Management is assured good health and high efficiency of labor collective members, safety, qualitative production and qualified services are important not only for ECC-VECO but also for its clients.

2. Drugs and alcohol abuse or their misuse is a root of problems breaking normal work environment as follows:

* increase in occupational traumatism;
* excessive dead time;
* cost increase of health care programs and sickness benefits;
* increase in occupational thefts, descent of moral principles in labor collective;
* decline in productivity and quality loss of our production and services.

3.ECC-VECO shall endeavor at maintenance of safe, healthy and productive work environment for its employees and is intended to exclude potential consumption of drugs and alcohol on workplace. Any employee must pass alcohol and/or drug test prior to their going to site.

4. Preparation, distribution, possession, advertising, sale or consumption of the illegal drugs as well as abuse or misuse of any legal drugs or strong drinks at the camp area or during work performance at the construction site is forbidden and entails the disciplinary sanctions up to and including termination.

5. Work under influence of drugs or alcohol is forbidden. This entails the disciplinary sanctions up to and including termination.

6.ECC-VECO has the right to demand employees to pass the test in the case of the reasonable suspicion in abuse or misuse of drug or alcohol (test "for reason") or in the case if results of the previous tests conducted at any moment after employment of a worker to ECC-VECO were positive.

7. The subject tests are carried out without advance notice and if presence of the illicit drugs in organism will be proved or if an employee can not pass test in full, such worker shall be subject to the disciplinary sanctions up to and including termination.

8. Also "selective" tests can be carried out reasonably required due to specific working environment or requirements of the state standards and regulations or contract conditions, and also on Client’s request.

9. Project employees should be familiar with "Program for alcohol, drug and toxicant consumption control at ECC-VECO production facilities” against signature.

**PROGRAM**

**for alcohol, drug and toxicant consumption control**

**at the production facilities**

**1. General**

1. The objective of this Program is to establish conditions excluding fulfillment of job responsibilities by ECC-VECO employees being in condition of alcoholic, drug or toxic intoxication.

2. Job responsibilities mean management and performance by employees of production processes which all ECC-VECO activity types relate to.

3. This Program extends to all ECC-VECO employees as well as to all employees of the outside organizations working at ECC-VECO facilities.

4. Requirements of the present Program should be included to the economic contracts with the outside organizations for works performance on “ECC-VECO” LLC objects.

## 2. Procedure of alcohol, drug and toxicant control and testing commission work

1. Alcohol, drug and toxicant control and testing Commissions (hereinafter referred to as “Commission”) shall be set up in the organization departments of ECC-VECO (hereinafter referred to as “Departments”).

2. If there are some medical stations in the departments they conduct testing for alcohol, drug and toxic intoxication.

3. If there are no medical stations in the departments, a Commission of at least three individuals shall be assigned to conduct test alcohol, drug and toxic intoxication of employees. The commission shall be authorized to survey a suspected employee for alcohol consumption by means of examination, testing or testing aids. In case of a positive test result the commission shall make a report and take him off from his job responsibilities.

4. The major objective of the Commission is:

* testing of employees for alcohol, drug and toxic intoxication to strengthen labor and industrial discipline in ECC-VECO;
* checking of luggage, containers with products and equipment to find any alcohol, drugs or toxicants prior to getting them off to shift or rotation, during the trip and on site.

According to the major objective the Commission has the right:

* to test employees for alcohol, drug and toxic intoxication at any time according to the “Program for alcohol, drug and toxicant consumption control at ECC-VECO production facilities”.

5. Department Managers shall inform ECC-VECO Management on facts of alcohol, drug and toxic intoxication of employees during working hours.

# 3. Procedure for testing of employees for alcohol, drug and toxic intoxication

1. Production process management, operation of the equipment and mechanisms by individuals being in condition of alcohol, drug and toxic intoxication leads to occurrence of contingency situations, lost time injuries or disabling injuries.

2. Testing for alcohol, drug and toxic intoxication can be applied to any employee of ECC-VECO suspected for alcohol, drug or toxicants consumption as well as any employee of the outside organizations working at ECC-VECO production facilities.

3. Testing for alcohol, drug and toxic intoxication shall be conducted by the Commission of structural divisions according to “Procedure of alcohol, drug and toxicantcontrol andtesting commission work”.

4. The Commission shall work according to the “Procedure of alcohol, drug and toxicantcontrol andtesting commission work”. Members of the Commission should complete special training.

5. Testing of employees working by rotating scheme can be carried out before their departure (before getting on a car, air or sea vessel), during their trip to the workplace as well as prior to the beginning of shift, during labor shift and upon its termination.

 6. One or several responsible persons among technical officers shall be appointed by the decree for observance of vehicle traffic route and Rules of conduct in a vehicle, air or sea vessel compartment during shift transportations.

7. ECC-VECO employees must come to the established place and at the set time for drug testing upon demand of a work supervisor.

8. If required, testing for alcohol, drug and toxic intoxication can be carried out in any medical station upon demand of the Commission (shop manager, superintendent).

9. In case of technological failures resulting in material damage or accidents with employees shop managers, department managers should take measures for medical examination of work performers and supervisors.

10. If an employee is found in a state of alcohol, drug and toxic intoxication at the production facility the Commission shall draw up a report and notify the Department Manager.

11. Upon demand of the Commission an employee must submit a written explanation of alcohol, drug and toxic intoxication state.

12. An employee’s refusal to provide written explanation and pass drug test cannot be an obstacle for recognition that he is in a state of alcohol, drug and toxic intoxication.

13. Medical examination includes:

* External inspection;
* Functional status estimate (sphygmus, prelum);
* Alcohol test;
* Testing;

14. If an employee is required to be sent for medical examination a written appointment card shall be made out by Shop manager or his assignee.

15. Medical examination shall be carried out in the medical station or in the nearest medical establishment.

**4. Procedure for checking carry equipment, employees’ property to control alcohol, drug and toxicants**

1. To ensure safety of production processes and health protection of employees, the shop and department administration shall be authorized to carry out checks of personnel luggage as well as carry cargo to control of alcohol, drug and toxicants.

2. Employees shall be subject to checks prior to getting off by special transport and upon their arrival at the production facilities.

3. Containers with food stuffs and equipment, boxes with spare parts, etc. shall also be subject to check to control of alcohol, drug and toxicants.

4. All ECC-VECO employees as well as employees of the outside organizations working at ECC-VECO production facilities should be familiar with this Program against signature; they should know and fulfill its requirements.

**5. ECC-VECO employees are FORBIDDEN:**

* **to use, store, distribute or sell drugs in ECC-VECO premises or during work at the ECC-VECO facilities;**
* **to use or store alcohol in any closed or open capacities in ECC-VECO premises;**
* **to set about work under influence of alcohol or drug.**

*In case if a doctor prescribes an alcohol based medicine to an employee he/she shall inform Shop or Department Manager prior to going to shift.*

**6. Procedure of employees’ testing for alcohol, drug and toxicants intoxication prior to getting them to site**

1. To ensure safety of production processes and health protection of employees, to comply with requirements of the labor Code of RF and liabilities undertaken under Sakhalin-1 Project ECC-VECO employees shall pass drug test prior togetting them to site.

2. Documents confirming passing test shall be submitted with a job placement order and kept in HSE Department at site.

3. Testing and document submission shall be controlled by Department Managers.

**7. Responsibility of employees for program requirements violation**

1. Failure to satisfy requirements of this Program is considered a violation of industrial and labor discipline.

2. An employee with positive result of drug test and medical examination shall be dismissed from work. This employee shall be subject to disciplinary sanction measures according to the current legislation including dismissal.

3. Employees of the outside organizations working at ECC-VECO production facilities in a state of alcohol, drug or toxic intoxication should be immediately dismissed from work and removed from the facility. The management of the company that sent this employee to ECC-VECO facility shall be notified about the fact of dismissal from work.

4. ECC-VECO Department Managers should take measures to ensure department employees satisfy the requirements of this Program.