

Alcohol and Drugs Policy

Stolt-Nielsen Limited
Human Resources

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General Compliance

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1.0 Scope and Application

Stolt-Nielsen Limited is committed to creating a drug and alcohol free workplace in all locations to safely achieve its business objectives. This commitment:

- promotes employees' wellbeing, health and safety;
- creates a work environment where employees feel safe;
- recognizes the importance of satisfying the client and providing quality service; and
- improves business performance including management of business risk and associated costs

The Drug & Alcohol Policy and Procedures will apply to all employees as well as contractors, interns and consultants.

The purpose of this policy and procedures is to address the possibility of our workplace safety of our employees/contractors or customers being adversely affected by people who have unacceptable levels of drugs and/or alcohol in their system.

2.0 References

Disciplinary Policy; and
Local Alcohol and Drug Policies.

1. With Management authorization, alcoholic beverages can be brought onto, consumed upon or contained in or on Company premises.
2. However, it is expected that employees should not be under the influence of alcohol (as defined below) whilst on company premises or company business.
3. Failure to comply with these obligations can be cause for disciplinary action up to and including termination of employment, in accordance with local policies.

If off-duty abuse of alcohol or drug abuse is believed to be the cause of excessive absenteeism or tardiness or unsatisfactory work performance, the employee involved may be referred to a recognized rehabilitation program. However, active participation in a treatment program for alcohol abuse or drug abuse will not be an exception to the principle that unsatisfactory job performance may result in termination of employment. (NOTE: Local policies may already indicate this)

The consumption or storage of any illegal drugs in any quantity on company premises is prohibited and will be cause for disciplinary action up to and including immediate termination of employment.



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No prescription drug shall be brought onto Company premises by any employee other than the employee for whom the drug is prescribed by a licensed medical practitioner, and shall be used only in the manner, combination and quantity prescribed. If prescription drug abuse is believed to be the cause of excessive absenteeism, tardiness, or unsatisfactory work performance, the employee involved may be referred to a recognized rehabilitation program. However, active participation in a treatment program for drug abuse will not be an exception to the principle that unsatisfactory job performance may result in termination of employment.

Employees shall, when drugs are prescribed by a medical professional, inquire of the prescribing professional whether the drug prescribed has any side effects which may impair the employee's ability to safely perform their job duties. If the answer from the medical professional is yes, the employee shall obtain a statement from the medical professional indicating any work restrictions and their duration and present that statement to his or her supervisor prior to going on duty. If the restrictions cannot be accommodated, the appropriate leave of absence or disability time should be requested until the condition which requires the medication has subsided.

Any of the following action can lead to disciplinary action up to and including termination of employment:

Refusal to be assessed, evaluated and/or referred;

Refusal to be tested and/or providing false information/adulteration of sample;

Refusal to participate and complete a recognized rehabilitation program

(Country specific Labour law will be leading)

3.0 Definitions

"Alcohol or alcoholic beverage" - means any beverage that may be legally sold and consumed and that has any alcoholic content;

"Drug" - means any substance (other than alcohol) capable of altering the mood, perception, pain level, or judgment of the employee consuming it;

"Prescribed drug" - means any substance lawfully prescribed administered or dispensed by a licensed medical practitioner or an over the counter drug;

"Illegal drug" - means any drug which affects the brain or central nervous system causing stimulation, depression, or hallucinogenic behavior, as defined by each country/ government. This includes, but is not limited to marijuana, cocaine, opiates, amphetamines and phencyclidine (PCP). Illegal drugs do not include any prescribed drug;



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“Under the influence of alcohol” - means a person to whom this policy applies whose blood alcohol level content is found to be equivalent to or greater than the local authority/state recognized level for operating a motor vehicle shall be considered to be under the influence of alcohol;

“Drug abuse” - means the use of or being under the influence of any illegal drug or the non-prescribed use of prescription drugs where the employee’s mental or physical abilities to perform his/her job requirements may be affected;

“Company premises” - means any Company owned, rented or leased property, work site locations or Company owned, leased or rented vehicles, or equipment;

“Testing facility” - means a facility that is certified or licensed to do alcohol and/or drug testing;

“Rehabilitation program” - means a program provided by a certified or licensed facility for the rehabilitation of those employees who are afflicted by drug or alcohol abuse;

“Reasonable cause or suspicion” - means the belief that an employee is under the influence or has used drugs in violation of Company policy.

This belief may be based on 1) observable actions such as use, possession, solicitation or transference of drugs on Company premises, 2) abnormal conduct or erratic behavior or deterioration in work performance, or 3) report of drug use from a credible source;

“Over the counter drug” - means any legal drug which can be purchased without a prescription;

“Safety-sensitive positions” - means those positions, the performance of which requires a high degree of care and caution in execution, such that any impairment would constitute a serious safety or environmental hazard, including positions which have decision making accountability for safety sensitive positions as well as those positions designated under federal regulation;

“Careless acts” - means any actions, omissions, accidents or incidents resulting in personal injury, death, contamination of product or other damage to Company property, including automobiles;

“Violation of safety and operational procedures” - means any actions, omissions, accidents or incidents resulting from non-conformity to applicable safety and operational procedures.



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4.0 Requirements and Process

- This policy applies to all Stolt-Nielsen employees, contractors, interns, consultants at, or those representing Stolt-Nielsen.
- Alcohol and other drugs shall not be consumed on the organisation's premises or in work vehicles except with management authorization.
- At no time will paid employees or representatives of the organisation exceed local legal drug and alcohol limits.
- In the case of 'Social events' no alcoholic beverage will be brought onto, consumed upon or contained in or on Company premises except with management authorization.
- Employees may take prescription drugs for legitimate medical reasons. If these drugs are likely to affect performance or behaviour, a supervisor must be notified. This is especially important when workplace safety is at risk, such as when driving, working at heights or operating heavy machinery.
- Local legal limits will apply to the consumption of alcohol or other drugs at any time prior to commencing work, if this consumption may impair the employee's ability to perform their required duties.
- Any employee identified as having an alcohol or drug-related issue that is impinging on their ability to perform their duties:
 - will be treated with respect
 - can expect and will be afforded complete confidentiality can be assured that this incident will not be cause for discrimination in the future, with regards to their future employment or potential promotion.

5.0 Consequences

Policy violations can have far-reaching consequences, including but not limited to termination of employment. The consequences are further defined in local policy and by country-specific law.



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