



## GROUP ALCOHOL AND DRUGS POLICY

### GEOFFREY OSBORNE LIMITED AND SUBSIDIARY COMPANIES

#### 1. INTRODUCTION

Geoffrey Osborne Limited accepts its responsibility for the actions of its employees, while at work. We supervise, train and advise them on the manner in which we require them to conduct themselves. The potential safety implications of actions carried out by people who are impaired through either the effects of alcohol or drugs are well established, particularly within a high-risk environment such as a construction site. The Company has assessed the risk of employees under the influence of alcohol or drugs while at work, and following extensive consultation, have decided to clearly restate the Policy. The Company Safety Policy states that “**safety is paramount**” and that “**there is no conflict between safety and production**”. This policy has been published so that our employees and other stakeholders can clearly understand the Company requirements in order to maintain the high standards of safety that the Directors demand.

#### 2. REQUIREMENTS WHICH EXCEED THIS POLICY.

When we are operating in an environment that has a more stringent Alcohol and Drugs policy than this Group Policy then it is the policy of the Company that our employees and contractors **comply with the more stringent policy**. For example, this is the case when working for Network Rail who sets a lower threshold for alcohol and require random screening for certain jobs. Employees and contractors will be informed of the more stringent policy.

The Company considers it to be appropriate to differentiate between areas of risk, viz.

- Persons on site (or going to site).
- Persons who are office based and will not visit a site.

For clarity, the term site includes construction sites, any workshops and minor maintenance or snagging works at offices, houses etc.

##### 2.1 Alcohol

**(a) For persons on site (or going to site):** Persons are not permitted to enter a site with an alcohol level in excess of the current legal limit for driving. Anyone who appears to be impaired through alcohol, or smells of alcohol, will only be allowed on site after they agree to a test carried out by a medical collecting officer<sup>1</sup>, and the test shows negative for alcohol and drugs.

**Persons on site (or going to site) are not allowed to consume alcohol during his or her working shift (day or night).**

**(b) For office based employees:** Persons must not arrive at an office with an alcohol level in excess of the current legal limit for driving. Anyone who appears to be impaired through alcohol, or smells of alcohol, will only be allowed into the office after they agree to a test carried out by a medical collecting officer, and the test shows negative for alcohol and drugs.

**Office based staff may consume alcohol during their working shift but must not consume a quantity that will cause their alcohol level to exceed the current legal limit for driving.**

##### 2.2 Drugs.

The Company policy for drugs will be applied equally in all circumstances, regardless of location or activity.

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<sup>1</sup> Medical Collecting Officer: someone who is qualified and employed by an agency (e.g. BUPA) that is authorised to take medical samples and ensure the chain of custody is maintained

We distinguish between prescribed drugs and illegal substances. Prescribed drugs include controlled drugs, as defined by the Misuse of Drugs Act 1971 that have been prescribed by a person authorised by, and in accordance with, current regulations and “over the counter” medicines. Illegal substances include the abuse of legally used solvent-based substances and the illegal use of controlled substances.

**(a) For prescribed drugs and over the counter medicines:** the employee must inform the prescribing medical practitioner, or pharmacist, of their occupation and enquire as to if there is any potential safety implications involved by taking the drug(s). He or she must inform the Company if there is any possible side effect that may have safety implications (such as drowsiness, dizziness etc). The Company will carry out a risk assessment of the employee’s work activity and determine if it is necessary to redeploy him or her while taking the drug(s).

**(b) For illegally used controlled substances:** regardless of category (class A, B or C) the Company does not allow the illegal taking of controlled substances in any circumstances.

**(c) For glues and solvents legally used within the workplace:** anyone abusing solvent-based substances legally used in the workplace will also be in breach of this policy.

### **3. TESTING FOR ALCOHOL AND DRUGS.**

**3.1 Random testing:** the Company does not operate a random Alcohol and Drugs screening process.

#### **3.2 For-cause testing**

**(a) Employees:** When the Company considers an employee to be displaying signs of impairment through the possible influence of alcohol or drugs, or smells of alcohol or drugs, the Company will require the employee for his or her consent to carry out a for-cause alcohol and drugs test. If written consent is given the Company will arrange for a medical collecting officer to take samples from the employee for analysis. The employee should not be allowed to work until the results of the tests have been obtained.

**(a.1)** Following a safety incident (accident, dangerous occurrence etc) the Company may ask employees involved with the incident for their consent to carry out for-cause alcohol and drugs testing. If written consent is given the Company will arrange for a medical collecting officer to take samples from the employees for analysis. The employees will not be allowed to work until the results of the tests have been obtained.

**(b) Persons not employed by Osborne:** in the above circumstances such persons will be asked for their consent to carry out for-cause testing.

**(c) Refusal to consent to for-cause testing:** if an employee refuses to give his or her consent to provide a sample for testing, they will not be allowed to work and will be disciplined under the normal Company Disciplinary Procedure.

If a person not employed by Osborne refuses to give consent they will not be allowed onto Company controlled premises and their employer informed of the circumstances.

### **4. TEST RESULTS**

**(a)** Where a test results show no signs of alcohol or drugs then the Company will inform the person of this as soon as possible. All documentation relating to the test will then be destroyed, unless it forms a necessary part of an Accident Investigation Report.

**(b)** Where a test result is above permitted levels stated in this policy then the Company, under the Company Disciplinary Procedure, will discipline employees.

**(c)** If a person not employed by Osborne has a sample that fails a test, their employer will be informed of the result. The Company will then make a decision as to whether or not the individual will be allowed to work on Osborne controlled premises in the future and will inform his or her employer of their decision.

### **5. STANDARDS.**

**(a) For alcohol:** the failure level shall be the same as the current level set in legislation (Road Traffic Act 1988, as amended) for driving a motor vehicle.


**(b) For drugs:** the substances tested for will be Class A, B and C drugs as defined within Schedules I, II and III of the Misuse of Drugs Act 1971, as amended. The failure level for each drug will be as advised by our medical adviser at a level that impairs ability to carry out work in a safe manner.

**6. DISCIPLINARY PROCEDURES.**

Non-compliance with this Group Policy (i.e. a sample that tests positive for excessive levels of alcohol or drugs, refusal by an employee to consent to a sample being taken or failure to enforce the Policy by a senior employee) will result in the Company Disciplinary Procedure. Non-compliance would not automatically constitute a reason for instant dismissal, albeit may do, dependent on the circumstances. Other disciplinary action may be more appropriate, such as training, coaching, re-training, counselling, or a suitable level of warning.

**7. DIRECTORS STATEMENT OF INTENT**

The foregoing is the Alcohol and Drugs Policy of Geoffrey Osborne Limited and Subsidiary Companies and applies equally to all employees and self-employed or sub contractors under the control of the Company. It has been prepared after due consultation with those involved in its operation, and has the full backing and authority of the Board of Directors.

  
Signed.....  
**Phil Shortman**  
**Group Board Director Responsible for Safety**  
**1 April 2009**