

DRUG AND ALCOHOL POLICY

This Drug and Alcohol Policy applies to all personnel employed on ships managed by the Company. The policy of the Company is to prevent the operation of ships by persons who are under the influence of alcohol or drugs.

The Company is committed to a safe, healthy and productive workplace for all employees. The Company recognizes that alcohol or drug abuse impairs one's ability to perform properly and has serious adverse effects on the safety, efficiency, and productivity of other employees and the Company as a whole.

Therefore:

- Possession, use, distribution, or sale of alcoholic beverages on Company vessels is subject to specific restrictions and controls.
- The misuse of legitimate drugs or the use, possession, distribution, or sale of illicit or prescribed controlled drugs on Company business or vessels is strictly prohibited and is ground for dismissal.
- If an employee violates any provision of the Policy appropriate disciplinary action will be taken.

Under the Policy, Alcohol Impairment shall be defined as blood alcohol content of 40 mg/100 ml (0.04% BAC) or greater.

The Company requires Officers and Ratings to submit to alcohol and/or drug testing in the following situations:

- Prior to engagement by the Company.
- Where cause exists to suspect alcohol or drug abuse.
- Alcohol Test within two hours after any significant or major incident. For minor incidents test can be carried out at the investigator's discretion.
- Drug test on each individual engaged or employed on board the vessel who is directly involved in a serious marine incident.
- As part of regulatory program of unannounced testing.
- Where testing is required by law.

The Company may also conduct unannounced tests and searches for drugs and alcohol on Company operated vessels.

A positive test result or refusal to submit to a drug or alcohol test is ground for disciplinary action, including termination of service.

Pilots and navigation advisors, office personnel, company guests, contractors, vendor personnel and other persons on board Company vessels will be required to comply with the policy restrictions on use, possession and distribution of alcohol and drugs and provisions regarding searches. Those who violate the policy will be removed from the vessel and may be denied future access.

01st October 2017
Monaco

Francesco Bellusci
Managing Director

