

**DRUG & ALCOHOL POLICY**

The Company, **SHIPS SURVEYS AND SERVICE S.r.l.**, has formulated the following Policy regarding Drug and Alcohol on ships under its management, in order to ensure that ship's staff does not navigate or operate equipment while impaired by drugs or alcohol and that they are able to respond to emergency at any time.

The Policy shall all times take into consideration and be in compliance with the Italian Law 271/1/99 (for Italian Flag ships), meets or exceeds the standards set out in the "*Guidelines for Control of drugs and Alcohol Onboard Ships*" issued by ICS/OCIMF.

The Company/Operator will consider all the times new forthcoming D&A regulation and reserve the right to implement the present Policy from time to time with more stringent requirement as the objective is to protect personnel exposed to the dangers, avoid accident, loss of human lives, pollution, ship's damages.

Prior embarkation each individual is explained about the Company Drug and Alcohol Policy and therefore shall sign the "Individual Agreement".

Responsibilities**Management**

- Verifying that ship's staff complies with such procedures by carrying out unannounced drug and alcohol tests (by shore lab.).
- Arranging unannounced Alcohol testing (breath analyser test) by ship's staff
- Arranging post incident D&A testing, for all staff, within 2 hrs of the incident by ship's staff
- Conveying to the Masters any additional drug and alcohol procedures lay down in the charter party exceeding this Company procedure.

Crew Manager or Manning Agent

- Arranging for D&A tests as part of pre-joining medicals
- Ensuring that every Master and crew joining vessel signs a declaration agreeing adherence to the Company's D&A Policy.

Master

- Ensuring that all ship's staff complies with the drug and alcohol procedures and other external laws relevant to the trade of the vessel.
- Carry out monthly alcohol test initiated by the Company
- Carry out Alcohol test as per "his discretion"
- Carry out post incident Alcohol test of all crew including himself
- Reporting violation of Drugs and Alcohol issues on board
- Controlling functionality of the alcoholmeter and inform well in advance any spare to comply with all tests to be done as per D&A Policy.

Ship's staff

- Never performing duties or operating equipment while impaired by drugs or alcohol at all times, being always able to respond to emergency.
- Never bringing on board any illegal drug or alcohol for use or sale.



- Never handing over any shipboard duties to anyone suspected to be under the effect of drugs or alcohol; if in doubt, to inform Master immediately.

1. DRUGS

Possession and use of drugs / illegal substances (include, but are not limited to, marijuana, cocaine, opiates, phencyclidine, and amphetamines) on board of Company managed vessels is strictly prohibited.

- (a) Whoever is determined to have such drugs / illegal substances or is suspected to be under the effect of drugs will be immediately dismissed from the vessel.
- (b) Drugs / illegal substances include, but are not limited to, marijuana, cocaine, opiates, phencyclidine and amphetamines.
- (c) All crew members must declare to Master the use of special medicines, and provide medical advice. Should the Master be in any doubt as to the effect of such medicines he must consult the Company and obtain verbal or written approval.

All crewmembers are obliged to immediately inform the Master of any suspect about use of or presence of drugs on board.

The Master shall exert every effort to prevent illegal drugs or substances from being brought on board of the ship. Unannounced and thorough searches on the ship, including staterooms and personal effects, will be made when deemed necessary and the results of these inspections entered in the deck log book.

Any illegal drugs or substances discovered by the Master or other ship's officers will be confiscated and placed in the Master's safe. Complete details concerning the amount and type of drugs, how, when, and where they were discovered, together with the offender(s) name will be entered in the ship's log and Company informed. Upon arrival in port, the offenders and drugs will be turned over to local Customs Authority.

USE AND POSSESSION OF DRUGS AND ALCOHOLIC BEVERAGES ON BOARD IS STRICTLY PROHIBITED

2. ALCOHOL

We as Company established that all ships managed are **ZERO ALCOHOL** and specifically as follows:

- a) Any alcohol beverage, of any type: Beers and Lagers, Table and cooking wines, Sherry or fortified wines, Spirit/Liqueur and any other beverage herewith not mentioned are severely prohibited.
- b) Therefore, the vessel has to be considered "**DRY**". Possession of Alcohol beverage, use distribution, sales are severely prohibited and contravention shall cause immediate dismissal and were required complaint to the competent Authority.
- c) Person cannot purchase alcohol ashore or via local ship chandler not even if consumption is by others.



- d) In accordance with Industry, the Company adopts the maximum Blood Alcohol Concentration (BAC) for owned/operated vessel as 40 mg/100ml of blood (0.04%) and 0% as follows:
- For all Officers including Master/Ch Eng., **anytime**, BAC shall not be above 0.0%.
 - For ratings with watching duty, **anytime**, BAC must be not above 0.0%
 - For all ratings not with watching duty max allowed is 0.04% during rest time in port, but **MUST** be 0.0% BAC while starting and during work time and in any case will observe the alcohol abstinence for at least 4 hrs. prior taking over the work.

Note: 40mg% (0.04%) Blood Alcohol Content (BAC) is equivalent to 17.5gpm per liter - Breadth alcohol content or 54 mg% urine alcohol concentration.

3. Drug and Alcohol testing

1) **Pre-employment :**

All seagoing personnel shall be subject to confidential Drug and Alcohol screening as prerequisite to employment with the Company. Results will be reviewed by the manning team and further tests may be carried out in cases where a positive result is recorded.

2) **Pre-embarkation :**

At every embarkation the seafarer is submitted to a medical examination but DO NOT include D&A tests. In this case, the seafarer is requested by the Company to present a pre-joining D&A test obtained by a Company Designated Doctor either in his hometown or in the Company Head Office.

- 3) All crewmembers returning from shore leave may be tested at the inside accommodation entrance at "**Master discretion**" and if found BAC above 0.04 he cannot take watch until BAC is 0.00% and in any case must rest for at least 4 hrs. In all cases, the Company will be advised.

Note: "Drug & Alcohol Register Record Book" is available to keep record of all tests results. Location, name/rank, time, name of the person that carried out and witnessed the tests and name of the tested person will be recorded and all MUST sign the logbook.

THE VESSEL ALCOHOL METER SHALL NOT BE USED ON DECK (TANKERS), AS THE INSTRUMENT IS NOT GAS PROOF / INTRINSICALLY SAFE TYPE

- 4) At intervals not exceeding "**one month**", the Company will instruct Master to carry out an unannounced Alcohol test to all crewmembers including the Master and Ch. Engineer. It is not necessary to perform the test to all crewmembers at the same time, but all crewmembers must be tested in one month. The day to carry out such test will be selected by the Company, and will be carried out by the Master in presence of one Officer or Rating. The person selected to assist the Master will be informed about 30 minutes before the tests take place. Time of the test will vary, as well as the designated person to assist the Master will not be the same each time "**discretionary test**" of crew is carried out initiated by the Master.

- 5) **Drug test:** the vessel is provided with Drug Test Kit and all Senior Deck/Eng Officers are trained to use, however Master should occasionally carry out a visual check of each person to see if they can be under the influence of Drug abuse.

- 6) **Unannounced Drug and Alcohol test,** by shore-based laboratory (third part testing) shall be carried out on each vessel every six months (Tankers, as far as practicable) as a



Company's Policies and Management Commitment

minimum for all the employed personnel on board at that time. The Master files copies of all associated paperwork handed to him by the QC, while the Company Crew Manager will receive the results of all tests from the laboratory, which are reviewed and forwarded to the Master.

7) **Random Test** by Superintendent/Internal Auditor during routine visit are required to carry out random on board Alcohol test (using vessel's breath analyzer test kit), or to the specific person on board whose performance is suspected of being impaired by intoxication, reporting immediately results (if positive) to the Master, Company or Authority.

8) **Post-Accident test** – Testing can also be required for all crewmembers on board in case of an accident such as collision, grounding, fire, explosion, severe injury or death on board. Such test can also be required in case of significant or potentially significant incident (Near Miss).

Should any Seafarer be found not complying with Company's alcohol policy during on-board or external testing the below disciplinary measures is to be followed:

- a) **During Alcohol test on board** – If the seafarer is found to be tested positive, a warning letter is to be issued to the defaulting seafarer in the presence of a witness. The copy of the letter is to be forwarded to the office. 2nd Violation on compliance with Alcohol Policy by the Seafarer during his stay on board or career in Company will lead to dismissal.
- b) **During Alcohol testing by external agencies** – If the seafarer is found to be tested positive, the Company will verify for any contamination of the sample due to medication. Once it is confirmed that the Seafarer is in violation of Company's Alcohol Policy, a warning letter will be issued to the seafarer. 2nd Violation on compliance with Alcohol Policy by the Seafarer during his career in Company will lead to dismissal.

If anyone on board the ship refuses to participate in tests listed in this Alcohol and Drug Policy, the test will be considered as positive and action is to be taken as described in the paragraphs above.

This Policy has to be posted on board, in the following locations:

Alleyways; Mess Rooms, Cargo Control Room; Wheelhouse; Engine Control Room.

All Officers shall ensure that this Policy has been brought to the attention of all people coming from ashore (Visitors, Contractors, etc.).

APPROVED BY

**Ships Surveys and Service Srl
Sole Administrator**

Naples, Rev. 06 – 30/05/2018