



# DRUG AND ALCOHOL POLICY

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CORPORATE HSE MS – ŞİRKET İSG-Ç YS - КОРПОРАТИВНАЯ СИСТЕМА УПРАВЛЕНИЯ ОХРАНЫ ТРУДА

The top management of the Company recognizes that the life and the health of employees are the highest value and takes measures aimed at preventing deterioration of the health of employees and avoiding injuries while performing work.

The Company is committed to apply this Policy for all employees and efficient implementation of Alcohol, Drug and Toxic Substances Policy.

It is prohibited for all employees of the Company and its subcontractors' employees to store, use, distribute or selling alcoholic beverages and drugs.

Alcohol intoxication is determined by the content of more than 0.00 ppm of alcohol in exhaled air or in the blood, and is the basis for dismissal.

All subcontractors are obliged to enforce the ban on the use, transportation, storage and distribution of alcohol and drug.

Before hiring the Company has the right to check the applicant for the presence of alcohol or drug addiction.

The Company reserves the right to conduct inspections of personal belongings of all its employees, as well as employees of subcontractors for the presence of alcohol or drugs in buildings, premises and at workplaces owned or controlled by the Company. Employees of the Company and employees of subcontractors are aware of the importance and necessity of such inspections and do not object to their conduct.

The company reserves the right to conduct unplanned or spot checks in the following cases:

- the presence of precedents of abuse of any substance at the checked object;
- work in a specific position indicated by the management;
- work in a position requiring such verification by law;
- after any incident, even if it did not cause damage to health or property damage.

The policy on alcohol, drugs and toxic substances is communicated to each employee by:

- mandatory personal familiarization within the recruitment process;
- visual information by means of posters placed within the work area and office premises.
- HSE Induction.

This Policy does not provide any privileges or exemptions from the usual requirements for employees at all levels in relation to the performance of their duties.

Violation of any of the articles of this Policy leads to disciplinary sanctions in accordance with the Labor Code of the Russian Federation. This Policy to be revised as necessary, but at least once in three years.

Anil Kundak

COO of Stellar Construction LLC

December, 2018