

OFFSHORE SUB-CONTRACTOR SUBSTANCE ABUSE POLICY

For the purpose of this Policy, a “substance” is defined as any substance which chemically modifies the body’s function resulting in physical, psychological or behavioural change. In this context “substance” includes, but is not limited to drugs, alcohol and solvents. Substance abuse is the use of these substances in an improper or harmful way.

Controlled substances (“illegal drugs”) are defined by the Misuse of Drugs Act 1971 and subsequent regulations made under this act. In general, it is a criminal offence for a person to produce, supply, offer to supply or be in possession of illegal drugs, other than in accordance with the direction of a Practitioner (a registered Doctor, Dentist or other authorised person).

In order to maintain a safe and pleasant working environment, we at SFF Services Limited (SFFSL) and Marine Environmental Solutions (MES) strongly advocate, and are committed to maintaining, a zero tolerance policy on no alcohol, no illegal substances ban at the workplace. We take this issue very seriously and it is important for Vessel Owners and Offshore Personnel to understand that this policy applies to themselves and their Crew Members, without exception.

No subcontracted Offshore Personnel or Vessel Crew Member is permitted to consume, possess, sell, transfer, or purchase alcohol, illegal drugs, narcotics or controlled substances, whilst subcontracted by SFFSL/MES. As part of this policy, we reserve the right to carry out random drug screening on subcontracted Offshore Personnel and Vessel Crew Members as deemed appropriate. Any prohibited substances found will be turned over to the appropriate law enforcement agencies and may result in criminal prosecution in addition to any disciplinary actions imposed by the Company. Acceptable uses of drugs include non-performance affecting "over-the-counter" medications and those substances that have been prescribed by a licensed Physician. It is the Vessel Owner / Skippers responsibility to report any subcontracted Crew Member who is under prescribed medication but who may be in any way impaired by its side effects to SFFSL prior to vessel mobilisation. It is the responsibility of Offshore Personnel to inform SFFSL/MES if they are taking any prescribed medication which may impair their performance of of subcontracted duties.

The Company will not tolerate any subcontracted Offshore Personnel or Vessel Crew Member who reports for duty while impaired by, or is under the influence of, alcoholic beverages or illegal drugs. Subcontracted Offshore Personnel and Vessel Crew Members who work under the influence of alcohol or an illegal substance are considered to be a threat to the safety of themselves, their co-workers, and the public. All Offshore Personnel and Vessel Owners / Skippers have a duty to report any evidence of alcohol or drug abuse to SFFSL/MES immediately. Failure to report, especially in cases where the alcohol or illegal substance poses an immediate threat to that individual, his/her co-workers or the public, may result in immediate termination of the hire contract. It is also, however, MES, SFFSL and its parent organisation, the Scottish Fishermen’s Federation, duty of care to assist subcontracted Offshore Personnel or Vessel Crew Members, in a supporting capacity, who suffer from alcohol or drug abuse.