

# Policy on Alcohol and Drugs

ClarineT's policy is to establish and to maintain a working environment that is safe, healthy and productive for all employees.

Company recognises that abuse (or improper use) of alcohol, drugs or other similar substances by employees, has a negative effect on their performance, can have serious harmful consequences for the employee and can jeopardise safety, efficiency and productivity of other employees and the Company in general.

It is therefore the policy of ClarineT and a condition of employment that an employee be present and able to perform their job free from the effects of alcohol, narcotics, depressants, stimulants, hallucinogens and illegal drugs or any other substances, which can impair job performance.

## Application

This Policy and each of its rules apply whenever an employee is on or in Company Property, surrounding grounds and parking lots, leased or rented space, Company time (including breaks and meal periods), in any vehicle used on Company business, and in other circumstances (such as on customer premises or at business/sales functions) we believe may adversely affect our operations, safety, reputation or the administration of this policy.

All employees are responsible for following all of Company's work and safety rules, and for observing the standards of behaviour and employer, co-workers, and customers have the right to expect from them. In addition, any employee that my believe to have a problem with drugs or alcohol, he/she is responsible for seeking assistance, whether from or through the company or any other resource, before a drug or alcohol problem adversely affects his/her work performance or results in a violation of this policy.

## Alcohol and Drugs

The following rules are extremely important and an employee who violates any one of them will be subject to disciplinary action, up to and including termination.

- ☐ Alcohol An employee may not possess, use, transfer, offer, or be under the influence of any intoxicating liquor while at work or on company business. This rule prohibits using any alcohol prior to reporting to work, during breaks or meal periods, or in conjunction with any Company activity, except social or business events where a Corporate Officer has authorized the moderate consumption of Alcoholic Beverages.
- ☐ Drugs An Employee may not possess, use, transfer, offer, share, attempt to sell or obtain, manufacture, or be under the influence of any drug or similar substance and also may not have any drugs of similar substances present in the body. Thus, an employee who tests positive for any illegal-drug violates this rule. This rule also pertains to Prescription drugs being taken without doctors authorization.
- ☐ Drug Paraphernalia and Alcohol Containers An Employee may not possess any Drug Paraphernalia or Alcohol Containers.
- ☐ Prescriptions/ Over-the-counter Medications It is the employees responsibility to check the potential effects of prescribed drugs and over-the counter Medications with your doctor or pharmacists before starting work, and to immediately let your supervisor know when such use makes it unsafe for you to report to work or do your job.
- ☐ Adulterants Any substance that is used for the purpose of Manipulating a drug test by adding to the specimen or ingesting.

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## **Advice, Assistance and Assessments**

We recognize that drug and alcohol abuse may be a sign of chemical dependency and that substance abuse can be successfully treated with professional help.

Any employee that feels to have a potential addiction problem is invited to seek medical advice and to undergo appropriate therapy without delay and before his/her condition can deteriorate his/her health and working capacity. No employee will be disciplined or discriminated against simply for seeking help. Personnel shall be granted all legal and contractual rights, and shall be treated in the most respectful way preserving their dignity.

Company commitment is to help employees remain productive members of our team. In certain circumstances, Company may insist upon a mandatory referral to employee medical assistance and/or assessments. If a professional assessment is made that result in a problem with Drugs or Alcohol, the continued employment may be conditioned upon entering into and completing a treatment program approved by the company and within the limits defined by the applicable law.

## **Checks**

The Company reserves the right to carry out checks on its premises for drugs and alcohol policy compliancy without notice. Such checks may involve both Company and third party personnel.

Whenever applicable Company may ask employers or competent authorities to remove third parties' personnel from its premises if they constitutes a risk or they violate this policy .

## **Smoking**

Company is also aware that, besides being forbidden by law, smoking in working environments may increase occupational health and safety hazards. Smoking is forbidden:

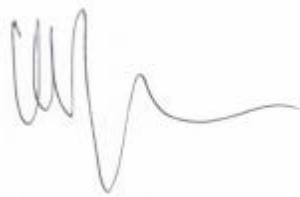
- ☐ Indoors (offices, meeting rooms, canteens);
- ☐ In all production areas, yards and workshops;
- ☐ While driving and performing working activities.

Smoking is allowed only within dedicated areas properly indicated.

**Marco Ramognino**

CEO

ClarineT srl



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