

Alcohol and Drugs Policy

This statement sets out the policy of the company in compliance with the current version of Rail Industry Standard RIS-8070-TOM and Company standard NR/L2/OHS/00120 Drugs, alcohol and substance misuse in the workplace and where applicable, the Sentinel Scheme Rules in respect of any employee, self-employed person, or contractor under our control who holds a Safety-Critical role, as defined in NR/L2/OHS/00120. It affects those whose proper performance of their duties is, or may be, impaired or otherwise affected as a result of being in an unfit state due to the consumption of alcohol and/or illegal substances (or prescribed drugs in certain circumstances). Client and Infrastructure Manager requirements for all operations will be adhered to at all times. Note: An unfit state refers to an employee being under the influence of drugs and/or alcohol which exceeds the limits set by The Railway Group Standard and European Workplace Drug Testing Society.

Provided that employees referred to above adhere to the provisions contained within this policy, then they will normally be considered to have demonstrated compliance with the conditions of employment or contract insofar as they refer to the use of alcohol and drugs.

All employees referred to above are to be made aware of the contents of this policy and become familiar with the conditions laid down. The company will take all reasonable measures to ensure that those employees are made aware of the contents of this policy and the effect on their continued employment by the company in the event of any breach of this policy. The company will take all reasonable measures to prevent, so far as is reasonably practicable, any breach of duty placed on any person by this policy.

Employees of the company will at all times exercise diligence in monitoring their colleagues and others who from time to time may be under the control of the company and noting and reporting any evidence of alcohol and/or drug abuse.

Should any employee suffer any problems or difficulties in respect of the misuse of drugs and/or alcohol, or should they have reason to believe that a colleague may be experiencing such difficulties, they may approach the signatory of this policy. That person will at all times treat any information provided in complete confidence and will take such measures that are deemed necessary to ensure that the matter may be resolved with the minimum of distress to the person concerned and any others who may be affected.

Where rail operations are undertaken, the standards identified above will be adhered to. It is under these standards that as a condition of employment by the company, all persons referred to above are responsible for:

- Never reporting to work or working in an 'unfit state' due to drugs or alcohol. Attending work whilst in an 'unfit state' due to drugs or alcohol is a breach of this standard and is considered a reason for gross misconduct;
- Informing the employer/sponsor of any prescription or over the counter drug/medication that might lead them to be in an 'unfit state', or adversely affect their ability to perform their role safely;
- Complying with all drugs and alcohol tests the employer/sponsor requires them to undertake;
- Informing the employer/sponsor where they have a drug and/or alcohol misuse concern that could endanger themselves and that of any passenger, employee or contractor. Employees/contractors who inform the employer/sponsor that they have a misuse concern with drugs and alcohol use prior to being informed of a requirement for them to undergo a test will, wherever possible, be offered access to drug and alcohol support services with mutual commitment from both employee and employer.
- Where a drug and/or alcohol misuse concern has been verbally disclosed, employees should not attend the workplace whilst under the influence, or where there is a possibility that detectable levels, of drugs or alcohol will be in their system. Should this occur then for-cause drug and alcohol testing and investigation procedures can apply.
- Following disclosing of a drug or alcohol misuse concern, employees should comply with any 'active monitoring' drug and alcohol testing deemed necessary, as outlined in the drug and alcohol support programme document.

The Sentinel Scheme Rules also place responsibilities for sponsored staff:

- Every (sponsored) Individual has a responsibility to be fit for work, not fatigued by excessive travel or work, and not under the influence of drugs or alcohol. Individuals shall report anything that may affect their ability to work safely including medication, lack of equipment or personal circumstances.

Employees must present themselves for medical checks (routine, unannounced (safety critical staff only) or "for cause") to verify compliance, as per their contract of employment. A refusal to submit to drugs and alcohol testing shall be regarded as a positive (fail) result. The positive result shall be stored on the Sentinel database. This includes leaving site after being informed a drugs and alcohol test is required. Where an employee, contractor (sponsored or safety-critical staff) refuses to submit to a drugs and alcohol test, they shall be immediately suspended from work and the matter shall be investigated.

Refusal or failure to pass any test will be classed as a reason for gross misconduct and may result in instant dismissal.

Failure to maintain the standard set out by this policy will be considered as a reason for gross misconduct and a breach of the Sentinel Scheme Rules; appropriate action will be taken in line with investigation findings.

Unannounced, random testing will be undertaken to ensure a minimum of 20% of safety-critical and sponsored staff are tested on a rolling 12-month basis, annually or within and between RISQS audits, whichever is the sooner. Testing shall take place sporadically throughout the 12-month period.

This policy will be reviewed annually, as a minimum.

Signed



Managing Director

Dated

12/06/2024