

**APPENDIX 7****Management of Alcohol and Drugs at Work Specification****Purpose**

To manage the Health *Risks*¹ associated with the misuse of alcohol and drugs.

Target Audience

- *HR Director;*
- *Managers;*
- *Contract Holders; and*
- *Employees.*

Scope

This document applies to all *Sakhalin Energy Assets, Facilities, Transport, Operations, Projects, and Activities*, including activities undertaken by any Contractor on behalf of the *Company*. This document does not apply to the residential areas of the Zima Highlands residential complex.

General Requirements**The Managers are *Accountable* for requirements 1–2:**

1. manage the risks associated with the misuse of alcohol and drugs;
2. ensure compliance with search and testing program

The HR Director *is Accountable* for requirements 3:

3. support the enforcement of the Company's Policy on the ban on the use of alcohol and drugs at work.

The Health Manager *is Accountable* for requirement 4:

4. develop and introduce procedures for Management of Alcohol and Drugs at Work, which include the below-listed activities:
 - 4.1. develop and implement the substance intoxication evaluation guideline;
 - 4.2. carry out testing for alcohol content in the exhaled air;
 - 4.3. ensure the availability of qualified medical professionals for examination of employees for alcohol and drug intoxication at remote worksites;
 - 4.4. develop the treatment and rehabilitation programme;
 - 4.5. support to the return of the employee to the working environment; and
 - 4.6. ensure the general awareness of personnel of the requirements of this document (via website).

The Supervisors are *Responsible* for requirement 5:

5. referral to medical examination for alcohol and drug intoxication in case of reasonable grounds to suspect alcohol or drug use at work and ensure compliance with the procedures listed in the and substance intoxication evaluation guideline.

¹ For italicised terms found herein, please refer to the Sakhalin Energy HSE Glossary.

**The Contract Holders are Accountable for requirement 6:**

6. ensure compliance with the requirements of this document as applicable to the management of alcohol and drugs at work during the works performed by the contractors in line with the contractual obligations.

The employees are Responsible for requirements 7–10:

7. ensure compliance with the Life Saving Rules with regard to the use of alcohol and drugs at work;
8. ensure own safety and health through compliance with the requirements of this document and encouraging the appropriate conduct of the colleagues;
9. notify medical professional responsible for examination for alcohol and drug intoxication about the medicines or drugs prescribed by physicians for the purpose of prevention and/or treatment; and
10. enrol to medical treatment and rehabilitation programme if alcohol or drug addiction problems are identified. Contact directly the Line Manager or health professionals for help and advice.

Special Requirements

11. Fitness to Work

- 11.1. It is the direct responsibility of the Company's employees and contractors' personnel to be fit to work. The Company's and contractors' personnel are prohibited to appear in the Company offices and/or work sites in the state of alcohol or drug intoxication.
- 11.2. Those Company's and contractors' employees who consumed alcohol in the off-duty time shall ensure that there is enough time for alcoholic influence to disappear by the work time.
- 11.3. All the Company's and contractors' employees shall notify their Line Manager accordingly if they administer a physician-prescribed medicine or another substance that may impact their ability to fulfil their functional duties (e.g. medicines causing drowsiness or impacting the ability to drive or operate other machinery). Upon arrival, the Company's/contractors' employees or the site visitors shall report to the local medical personnel concerning any medical substances they administer.

12. Use and/or Possession of Alcohol and Drugs

When within the Sakhalin Energy premises, any use and/or possession of alcoholic drinks in the unsealed or open packaging is prohibited.

13. Breach of Functional Duties

In the event of a disciplinary offence, i.e. failure to fulfil or failure to properly fulfil functional duties through an employee's fault, including due to alcohol or drug use, such employee shall be subjected to a disciplinary punishment as provided by the effective RF laws.

The below-listed acts are deemed to constitute an offence:

- 13.1. production, possession, distribution, or use of alcoholic drinks and prohibited drugs, or abuse of formally prescribed medicines within the Sakhalin Energy premises;
- 13.2. inability to perform production tasks due to alcohol influence, use of prohibited drugs or abuse of formally permitted medicines;
- 13.3. appearance at the workplace and/or fulfilment of duties during the working hours in the state of alcohol or drug intoxication;
- 13.4. failure to report to the Line Manager or the HR Director any fact of being accused of, found guilty of, or being under the investigation of, a criminal offence committed under the influence of drugs or alcohol; and
- 13.5. unwillingness to help where alcoholic drinks or prohibited drugs are suspected to be transported to the Sakhalin Energy premises or in the course of a search for alcoholic drinks or prohibited drugs.



14. Determination of the State of Intoxication

- 14.1. The state of intoxication induced by alcohol or by other prohibited drugs shall be determined through a medical examination based on the results of a clinical trial and a biochemical analysis, including the analysis of drugs content in biological fluids, and the determination of alcohol concentration in the exhaled air.
- 14.1.1. A person shall be deemed to be in the state of alcohol intoxication if medical evaluation is confirming the abuse status and the amount of alcohol in the exhaled air **is equal to or exceeds 0.16 mg/L** (or above **0.32 g/L** in the blood).
- 14.1.2. A person shall be deemed to be in the state of drug intoxication if medical evaluation is confirming the abuse status and the laboratory test for drugs or psychotropic substances in the sample of biological fluid shows a **positive** result.
- 14.2. Any other proofs supporting or refuting the fact of a breach of functional duties by an employee as described in this specification, may only be used as such subject to a recommendation and approval by the Sakhalin Energy Legal Department.

Special Requirements—Search and Testing

15. Search

- 15.1. A search shall be conducted by a duly authorised officer of law enforcement bodies if an applicable search warrant is available.
- 15.2. A search at offshore facilities may be conducted by the Vessel Master or by the Platform Manager.
- 15.3. Besides, the Company may conduct a search for the presence of drugs or alcohol at its facilities through duly authorised persons without prior notice.

16. Testing

- 16.1. Checks for alcohol concentration in the exhaled air as well as rapid tests for the presence of drugs in the urine may be conducted either before or during the working hours and may cover all the Company's and contractors' employees at any facilities of the Company. The testing procedure is set forth in the Procedure that constitutes a part of this specification.
- 16.2. Checks for alcohol concentration in the exhaled air are a part of pre-trip medical check-ups of vehicle drivers and medical examinations for intoxication.
- 16.3. The medical examinations shall be conducted if the Line Manager has any grounds to believe that his/her employee or a contractors' employee is in the state of alcohol/drug intoxication as well as in all cases of occupational injuries.
- 16.4. The medical examinations shall be conducted on the basis of the **Referral** for the Medical (Substance Abuse) Examination to be executed by the Line Manager/medical worker/security service employee as per the form provided in Appendix 1.
- 16.5. Random screening for alcohol concentration in the exhaled air shall be conducted across the entire Company. The Company is not obliged to notify its employees about such screening in advance.
- 16.6. A medical examination for intoxication shall be conducted by duly trained specialists in a duly licenced medical facility, using the equipment and materials certified and verified in the relevant RF state authorities.
- 16.7. The medical examination data shall be entered in the medical examination certificate (medical documentation—Registered Form No. 307/y-05) approved by Order No. 1 of the RF Ministry of Health and Social Development, dated 10 January 2006.
- 16.8. The state of drug intoxication may only be determined on the basis of the quantitative results of investigations conducted in a licenced laboratory and approved by a qualified medical specialist.

17. Search and Testing of Contractors

- 17.1. The Contractor shall comply with the requirements of this Management of Alcohol and Drugs at Work Specification, including searches, examinations, and testing.



- 17.2. The Contract Holders shall bear personal responsibility to ensure that the Contractors introduce and follow the requirements of the document Management of Alcohol and Drugs at Work in full compliance with the Sakhalin Energy standards.
- 17.3. The equipment for the testing and medical examination shall be provided by the Contractor. The equipment shall be certified and verified in the relevant RF state authorities. An examination shall be conducted by duly trained medical personnel, holding a valid licence, in a medical facility of the Contractor or, in the absence of such facility, in the nearest specialised medical facility of the Company.

Reference

Alcohol and Drug Testing Procedure ([1000-S-90-04-P-0197-00](#))

Attachment 1

Referral Form for medical evaluation on state of intoxication



Referral Form for
medical evaluation-2