

Alcohol and Substance Abuse Policy Statement

The Stepnell Group is committed to ensuring the health, safety and wellbeing of its employees and those affected by its activities. This policy has been developed to provide a clear and transparent understanding of The Group's commitment to ensuring the health, safety and wellbeing of its employees and those affected by its activities in relation to alcohol and substance abuse.

This policy applies to all direct and non-direct employees of The Group, regardless of their job function, and is applicable to all Group premises, including construction sites and Group vehicles.

To support this policy, the following rules will be strictly enforced.

No direct or non-direct employees shall:

- Report or try to report to work whilst impaired due to the use of any substance including alcohol or drugs (whether legal or illegal).
- Be in possession of alcohol or illegal drugs on Group premises. Unopened containers of alcohol will be permissible when alcohol is purchased offsite for consumption outside of work.
- Consume alcohol, illegal drugs or abuse any substance whilst on Group premises, or whilst representing The Group. Employees may consume alcohol at Group arranged functions when such consumption has been authorised by a Board Director or Regional Director.
- Attempt to sell, distribute or supply alcohol whilst on Group premises, or whilst representing The Group.
- Attempt to sell, distribute or supply substances and drugs which contravene the Misuse of Drugs Act 1971, the Psychoactive Substances Act 2016 and the Medicines Act 1968, whilst on Group premises, or whilst representing The Group. Any contravention of this, without exception, will be reported to the police.

Contravention of these rules is a very serious matter and The Group will take disciplinary action in the event of an infringement under The Group's disciplinary procedures, which may include dismissal.

Employees should familiarise themselves with the MRP09 Alcohol and Substance Abuse Procedure and the implications arising from a contravention of the procedure.

It should be recognised that prescribed and over-the-counter medicines may cause impairment to an employee's performance at work. It is therefore the employee's responsibility to seek advice from their medical practitioner or pharmacist on any medicines they are taking. They must inform their Line Manager, Site Manager or Human Resources of any possible side effects of their medication. Any medical information will be treated in strictest confidence.

Testing applies to all direct and non-direct employees of The Group. Testing will be carried out where there is a suspicion of a contravention of the policy (for cause), as part of an accident or incident investigation, and randomly.

Should an employee refuse to consent/comply with the testing process or provide a sample for testing they will be suspended immediately, pending the outcome of a disciplinary investigation. The Group reserves the right to treat a refusal to consent/comply with the testing process or provide a sample for testing the same as a positive test result. A refusal by a non-direct employee to consent/comply with the testing process or provide a sample for testing or failure to attend a random test if selected will result in that employee being removed from Group premises. Their employer will be notified of this decision.

The Group will endeavour to ensure that advice and specialist help are made available to any employee who feels they have or are developing a dependency relating to alcohol or substances and who voluntarily seeks help from The

Group via their Line Manager, Site Manager, any other Manager or Human Resources before a serious misconduct issue has arisen or before a test takes place or when they are proven to be in contravention of the procedure.

Signed:



Tom Wakeford
Joint Managing Director

01 January 2021