

Apraava Energy Group Entities



ALCOHOL & DRUG FREE POLICY

1. Policy Statement

Apraava Energy is committed to providing a safe and healthy work environment for all employees. We recognize that alcohol or drug abuse can impair and affect health and job performance. It is also hazardous to our workplace safety, employees' well being and productivity. Therefore, we must ensure that our workplace is free of any alcohol or drug or related problems. No employee will be allowed to work under the influence of alcohol or drug. Use or possession of drug or alcoholic beverages on our premises is strictly forbidden.

2. Policy Objective

- To provide a safe and healthy workplace and to ensure that our workplace is free of any alcohol and drug or related problems. This also applies to any form of abuse of legitimate, illicit or un-prescribed controlled drugs or other substances.
- To prevent, detect, correct and eliminate any problematic alcohol or drug related behavior.
- To closely monitor employees in positions which are critical to our workplace safety and business operations. This would include all the Top Executive positions – Specified Executives and those pre-identified Designated Positions.

3. Policy Content: Roles

- **Managing Director** is responsible for identifying and reviewing the Specified Executive positions within the business.
- **Human Resources Department** is responsible for:
 - Reviewing the policy and the process as appropriate to ensure that an effective system is in place for prevention, detection, correction and control.
 - Maintaining an updated list of Specified Executives and Designated Positions within the business.
 - Ensuring monitoring measures such as pre-employment, pre-assignment, annual medical examinations and random tests are in compliance with the requirements.

- **Function / Asset heads**, in consultation with Human Resources should:
 - Be fully responsible for the enforcement, compliance and control measures of this policy.
 - Take appropriate corrective and disciplinary actions, up to and including summary dismissal, in case of any violation.
 - Identify Designated Positions for close monitoring by the alcohol and drug control programs.
 - Help employee concerned to correct his behavior and seek treatment.

- **HSSE department of Apraava Energy is responsible for:**
 - Collaborating with the Human Resources department in the overall coordination and execution of the policy e.g. random tests to ensure full compliance with the policy.
 - Collaborating with the Human Resources department to appoint a service provider for medical service and ensuring that their service is carried out satisfactorily.

- **All employees** should:
 - Refrain from any problematic alcohol and drug related behavior including but not limited to:
 - Working under the influence of alcohol or drug;
 - Alcohol or drug abuse or dependency;
 - Misuse of legitimate drugs;
 - Use and possession of illicit or un-prescribed controlled drugs or drug paraphernalia, or alcoholic beverages* on our premises.

*(*Consumption of alcoholic beverages on our premises is permissible on special occasions with prior Management approval and subject to obtaining necessary approvals from the State Authority as per prevailing laws of the land. The restriction does not apply to our company provided residential premises)*
 - Apraava Energy Authorized Drivers MUST NOT drive or attempt to drive or be in charge of Apraava Energy vehicles when they have consumed alcohol.
 - Disclose any alcohol and drug related problem to supervisor, rectify the behavior and/or seek treatment. No one will be terminated for the disclosure. However, Specified Executives and those in Designated Positions must be transferred out immediately.

- Undergo:

- Pre-employment medical examination with alcohol and drug test as and when required by the company;
 - Alcohol and drug test when behavior causes reasonable doubt to the supervisor;
 - Unannounced random tests for those with alcohol and drug abuse history.
 - Make a declaration on alcohol and drug abuse history.
 - All employees must understand and observe the Apraava Energy Alcohol and Drug Free Policy and cooperate with the management in attending for cause testing.
- **Employees in Specified Executive and Designated Positions** should undergo:
- Pre-assignment alcohol and drug test for existing staff appointed to Specified Executive or Designated Positions
 - At least one random test every two years.

Version Control

Version No.	Release Date	Changes
1.0	August 2011	-
2.0	September 2013	No material change in the policy. Minor modifications made.
3.0	December 2016	No material change in the policy