

ALCOHOL & DRUGS ABUSE POLICY

Navalimpianti Group (Navim) recognizes that drugs and alcohol can impair ability to perform duties in a safe way, and adopts the policy that nobody, whatever rank, will work while impaired by drugs or alcohol.

Personnel found to be in violation of this policy shall be immediately released from duty.

Being unfit for work due to the use of drugs or alcohol gives grounds for employment termination.

In support of its drug and alcohol policy Navim has set the following directives:

- The use of alcohol is strictly prohibited on all work's situations;
- Navim prohibits the use of any substance which is defined as narcotic and is illegal; the acquisition and use of all medical supplies and prescribed medicines, used for medical reasons are allowed only by the doctor in charge; his permission is given and any conditions he sets are carefully followed;
- the distribution or sale of alcoholic beverages on Navim premises by any individual is not allowed;
- nobody under the influence of alcohol or drugs is permitted to work;
- Navim may, from time to time, conduct unannounced searches for drugs and/or alcohol within his premises.

Navim will take disciplinary action, including dismissal, against anybody, during the work time:

- consuming banned substances at any time;
- performing duties under the influence of drugs or alcohol;
- caught in possession or found to have been accessory in bringing alcohol or any banned substance.

Navim may require employees to be submitted to medical evaluation, or drug and alcohol testing, where influence by drugs or alcohol is suspected.

The consumption of alcohol is to be forbidden to all persons for the entire period of day working.

This policy applies to all the operations managed by Navim.

All employees have responsibility to comply with this policy.

Adherence to this policy is considered as a term of employment.

Genova, 27th April 2018

Navalimpianti Group