	Aruba Stevedoring Company N.V. Standard HSSE Operating Policy		Doc No:	170915
			Initial Issue Date:	09/15/2017
General Drugs and Alcohol Policy			Revision Date:	06/03/2024
			Revision No.:	2.0
			Next Revision Date:	03/10/2025
Preparation: A.M	Authority: HSSE Manager/PFSO	Issuing Dept: HSSE	Page:	Page 1 of 4

Purpose

This policy establishes and maintains a drug and alcohol policy to ensure a safe, healthy, and productive work environment.

It is our commitment to provide a safe work environment that is free from the effects of drugs and alcohol as their use impairs judgment, which could result in increased safety risks, injuries, and faulty decision-making. The abuse of these substances also imposes an integrity risk on the person working on the Ports of Aruba that are considered as borders / highly secured areas.

Scope

This policy applies to all individuals associated with ASTEC N.V., port users, ASTEC employees, and third parties who have access to the port premises, including the dockyards, the port, and the port facilities, hereinafter referred to as "the premises."

General


ASTEC strictly prohibits the use, possession, sale, purchase, manufacture, distribution, transfer, or consumption of alcoholic beverages and illegal drugs (collectively referred to as 'the Substances') on the port Premises.

The use, possession, sale, or distribution of the Substances and/or testing positive for any of the Substances while on Premises, on the job or during the workday is a dischargeable offense. All illegal Substances will be turned over by ASTEC to the appropriate law enforcement agencies and may result in criminal prosecution.

"For the purposes of this policy, illegal drugs are defined as:

- (a) any drug or substance that is not legally obtainable,
- (b) legally obtainable substances that have not been acquired through legal means, or
- (c) substances used in a manner or for a purpose other than that prescribed or intended.

Illegal drugs include, but are not limited to, substances such as Marijuana, Cocaine, Opiates, Amphetamines, and Phencyclidine (OCO)."

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Enforcement


ASTEC may use several different methods to determine if a person violates this policy. For example, ASTEC may always request witnesses, including co-workers or an enforcement agency, to document a person's behavior, including facial and bodily expressions, smell, speech, etc., to determine whether this Policy is being adhered to.

ASTEC may also choose the services of a laboratory or laboratory representative to perform drug and alcohol testing on bodily samples, which may occur during or outside scheduled or non-scheduled working hours. The following applies:

1. ASTEC may require a person to supply a sample for a drug and/or alcohol test at any time, for example when entering the Premises, whether at random, after an incident, or after an accident. ASTEC determines the time and date of the tests.
2. A person who is informed by ASTEC that a drug and/or alcohol test will be performed must report immediately and comply with the instructions to provide a testing sample at the designated place. Testing samples are generally urine samples but may also be other bodily fluids such as saliva, blood, or hair, to be determined by ASTEC.
3. If the drug test result is non-negative or positive for Substances, the person will be allowed to have a confirmation test performed at a different facility or by a different medical professional, to be determined by ASTEC. The original sample that was collected and tested non-negative will be utilized for the confirmation test. The person must indicate in writing within three (3) business days after having been informed of the initial results whether or not he would like to have such a confirmatory test performed. Confirmation test costs will be covered by the third party.
4. If the test result is non-negative or positive for Substances and the person is an employee of ASTEC, the person will be placed on non-active duty with pay pending the according decision by the company Management. If the person is a third party, the person will not be allowed on the property while the confirmation test is being performed.
5. If the alcohol test concentration is deemed above the legal limit applicable at the time of testing, a second breath specimen will be tested approximately 20 minutes later. The results of the second test will be determinative.
6. If the second alcohol test results exceed the legal applicable limit, and the person is an employee of ASTEC, the person will be placed on non-active duty with pay pending the according decision by the company Management. If the person is a third party, the person will not be allowed on the port as indicated under the section " Refusal of Drug and/or Alcohol Testing and Consequences" of this same procedure.
7. The Human Resource Advisor will communicate the testing results to the person involved as soon as possible.

Below find instances when substance testing will occur:

- A. Pre-Employment Testing
- B. Post-incident testing
- C. Random test
- D. Reasonable suspicion/Reasonable cause testing

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In case of any other situation not described above, that creates a risk for security or safety, ASTEC will enforce the drug and alcohol policy.

Refusal of Drug and/or Alcohol Testing and Consequences

Anyone who is summoned by ASTEC for testing is required to follow instructions and take the drug and/or alcohol test immediately and without hesitation. Any additional behaviors are considered a refusal to perform testing and will be treated as a tested non-negative/positive result, including but not limited to the following:

1. Does not perform the test at the time or in the manner as instructed.
2. Leave the test facility without completing the tests as per the instructions.
3. Refuses or fails to provide a bodily sample as per the instructions.
4. Refuses proper supervision of laboratory personnel to supervise when the test samples are collected.
5. Refuses or does not want to sign the test form unconditionally.
6. Refuses an assignment for the repetition of the test.
7. Declines to follow the instructions of ASTEC and/or the laboratory related to the test procedure.
8. Takes an action to prevent the test or to hinder test completion.
9. Unable to produce a (sufficient) sample for testing analysis without valid medical reasons to do so.
10. Has tampered with a sample or has tried to distort, falsify or replace the sample.
11. Leaving the scene of an accident on company premises without a valid reason before tests have been conducted. Leave the site of an accident without a valid reason before taking the test.

The labor agreement of ASTEC Employees who have violated this drug and alcohol policy will be terminated for urgent reasons.

Third parties who have violated this drug and alcohol policy will have their credentials revoked as per immediately and well for an indefinite period.

This policy is approved for implementation by,
 HSSE Manager / PFSO,



Mr. A. Montilla