



深港海事安保有限公司 SINO GUARDS MARINE SECURITY LIMITED

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DRUG AND ALCOHOL POLICY

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Sinoguards Drug and Alcohol Policy

1. Application

1.1. This policy applies to:

- All SG'S Contractors and Permanent Staff Including Port Agents in contact with Firearms movements.
- Individuals considering a Contracted post within Sinoguards.

2. Purpose

2.1. The purpose of this policy is to ensure that members of Sinoguards are deterred from engaging in substance and alcohol misuse and, where individuals place themselves, others and the Company at risk from such misuse, they are identified and dealt with appropriately. We have a duty to ensure that the vast majority of our Contractors and Agents who are not substance and alcohol misusers are not affected or put at risk by the actions of those few who are. Substance misuse testing is designed to help create and maintain a healthy workforce and supports the ethos of high integrity, individual responsibility and accountability. It will also demonstrate a commitment to enhance Client confidence in the service we provide.

2.2. This policy does not seek to automatically punish those who have drug or alcohol problems. The provision of support, for those who acknowledge they have a problem with substance misuse, remains unaffected by this policy.

4.3. The policy covers the use of testing across a wide range of categories that will detect and deter substance and alcohol misuse amongst Contractors and Agents. Sinoguards Operations involve many high-risk activities where there is also a high degree of contact and interaction with our clients. We have a duty to ensure that our Contractors are fit to carry out their duties safely and effectively and any form of substance misuse places at risk the health and safety of users, colleagues and our business partners, and also compromises individual or organisational integrity.

3. Introduction

3.1. Apart from Road Traffic Act offences there is no legislation, which makes drug testing compulsory. However, as an employer, Sinoguards has a responsibility to protect its contracted workforce. This policy is based on Employment Contracts where the matter applies.



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3.2. In specified circumstances, Sinoguards Staff may become liable to be tested for signs of substance and alcohol misuse. The testing will aim to identify the misuse of any substances that are legally available, and also the misuse of drugs that are available on prescription. It also covers the use, in any form, of illegal drugs. Samples collected from Contractors will be screened, and where necessary analysed, using recognised testing methods and techniques.

3.3. This policy does not undermine the obligation on managers to investigate suspected criminal conduct or misconduct contained within any legislative or misconduct provisions.

4. Scope

4.1. Testing for drugs will be proportionate and random. Whilst acknowledging the value of maintaining a fear of detection to shape behaviour, processes will focus on Random testing in a way that will control risk to Sinoguards and its Clients and ensure proportionality. Testing will be monitored by gender and ethnicity to ensure that it is used fairly and proportionately and is compliant with relevant legislation. (See Paragraph 8.6.2 for requirements to take a test).

4.2. Testing within the categories indicated below will be introduced incrementally:

4.2.1. Testing with cause (that is, where there is a reasonable suspicion of substance misuse);

4.2.2. Pre-Contracted screening prior to Deployment. And

4.2.3. Screening in Areas where Agents have direct handling of weapons.

4.3. Testing will cover the illicit use of the following substances:

- Amphetamines (including ecstasy);
- Cannabis;
- Cocaine;
- Opiates (e.g. morphine and heroin);
- Benzodiazepines.

4.4. In addition, with cause testing for alcohol may take place in respect of Contractors



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engaged in Operational roles. Contractors and Agents will be considered unfit for work in such safety critical areas if they are found to have consumed any intoxicants whatsoever during their deployment period. Sinoguards adhere to a **NO ALCOHOL** policy at all times. Masters are authorised to carry out Random breath testing of any SG;S Personnel at any time.

4.5. A range of recognised testing methods will be used including urine and mouth swab samples. These tests will be randomly conducted at any point during the contract period.

4.6. A confirmed positive result, or refusal to co-operate, under this policy, may be the basis for a criminal or internal discipline investigation.

4.7. The testing regime is aimed at being preventative and is designed to:

- Minimise the chances of substance misusers entering Sinoguards operational service in the first place;
- Deter Contractors and agents from substance misuse through the application of a policy that makes detection a real possibility;
- Encourage those with a substance misuse problem to identify themselves, so that they may be supported in seeking treatment;
- Screen Agents in safety critical areas (Weapons Handling), so as to minimise any risk of operations being prejudiced by impaired judgement;

5. Benefits

5.1. The progressive implementation of the substance misuse testing policy should lead to:

- A reduction in the risks to Sinoguards and our Clients.
- A continued improvement in professional standards across the Business;
- An enhancement of the reputation of Sinoguards;
- A strong deterrent by increasing the fear of detection, thus shaping behaviour;
- Improved quality of service to Sinoguards Clients;



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6. Who might be subject to testing?

6.1. Voluntary referral. Any individual who has a drugs problem can and should seek help from the Human Recourses (HR) Manager Sinoguards. Whilst a risk assessment is necessary in all circumstances it should be recognised that such voluntary referrals will, other than in exceptional circumstances, be treated on a support, welfare and treatment basis.

6.2. Pre-Contract screening can take place when a prospective Contractor attends for interview. Pre-contract testing should provide Sinoguards with an indication of whether a prospective candidate for a job abuses drugs and hence their suitability for future Contracts. **Pre-Contract testing sends a clear message to prospective Contractors about Sinoguards attitude towards drug use and helps to deter those who misuse drugs from seeking Operational work within Sinoguards.**

6.3. Refusal to participate in drug screening will mean that Sinoguards will not consider the candidate for Work in any form whatsoever.

6.4. It is the intention of Sinoguards to test a proportion of both Contractors and Agents during the period of their work to ensure that the policy is being followed. Screening may be undertaken on individuals within the Contract period without necessarily giving the individuals prior knowledge of when it is likely to take place.

6.5. Other groups 'with cause'

6.5.1. Sinoguards has the power to test Operators or Agents if they have reasonable suspicion to suspect misuse of drugs/alcohol. Authorisation for alcohol testing should start from the Managing Director, Sinoguards.

6.5.2. The requirement to take a drug test should be authorised by The Managing Director Sinoguards Operations.

6.5.3. For 'cause' to be established, the test of 'reasonable suspicion' must be satisfied. It should be made clear to the Contractor that testing 'with cause' may prove or disprove intelligence or allegations made. It should be noted that a single, anonymous allegation would not normally amount to cause. The reasons for suspecting that a Contractor has misused controlled drugs should be recorded in writing under Sinoguards operational Protocols



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6.5.4. Those who provide a sample for testing may seek advice from their own legal advisor or similar person. However, this will not delay the request or the provision of the relevant sample.

7. Treatment

7.1. Contractors or Agents with substance misuse problems should be encouraged to identify themselves and should be assisted in seeking treatment. However, self-declaration cannot be used to avoid the consequences of a positive test. Any such declaration must be made before the Contractor is notified of any requirement to take a test. A self-declaration made after being notified of such a requirement cannot be used to frustrate the Sinoguards disciplinary proceedings that may result from a positive test result.

7.2. Sinoguards Human Resources will consider cases referred and will give:

- Advice on the risks of substance misuse and determine if medical investigation is appropriate;
- Guidance about NHS services and suitable referral agencies for treatment;
- Advice on the person's fitness for continued service if recommended treatment has been unsuccessful.

8. Screening procedures

8.1. The procedures are principally focused on screening for illegal drugs due to the health and safety and vulnerability issues associated with their use. The principles of screening can equally be adopted for other substance or alcohol abuse when appropriate.

8.2. Sinoguards wishes to emphasise the duty of care owed to Contractors and to demonstrate a desire to enhance Client confidence in the service provided. Screening is also designed to help create and maintain a healthy workforce as part of the organisational health of the Company and to support the ethos of individual responsibility and accountability.

8.3. Screening will be carried out by suitably qualified and experienced Sinoguards staff using appropriate techniques and involves a carefully controlled evidential chain using, if necessary, an external testing agency.



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9. Testing

9.1. Testing for drugs consists of three stages:

- The initial taking of a medical history to establish current medication or potential drug taking currently or in the past;
- A screening test to indicate whether there are any potential problems with the drugs listed in 4.3;
- If the screening test is positive, a further test, using the residual specimen of saliva or urine will be conducted for full analysis at an independent laboratory.

9.2. The residual sample can be split in order to give the Contractor or Agent the opportunity to have an independent analysis done. The cost for this independent analysis will be borne by the Contractor. Costs will be reimbursed if the first analysis is found to be inaccurate. The person being tested will be advised that any positive screening test results provide a provisional indication only and an immediate further test may be sent for laboratory analysis. A subsequent medical review of those tests by Human Recourses will determine the final result.

9.3. Any positive on site screening test result should be communicated immediately to the Contractor. It is for the Sinoguards Operations Director to assess the risk, with guidance from Human Resources. In relation to the duties to be undertaken by the Contractor. Such risk assessment should stay in place until the final determination is made following appropriate medical assessment of the test results.

9.4. If a potential Contractor does not wish to submit to a test they may withdraw from the recruitment process.

9.5. Any qualifying Contractor is obliged, under this policy, to submit to a test and to declare, if required, personal information that will be treated in confidence by Sinoguards HR Department.

9.6. Sinoguards Human Resources manager is responsible for making the arrangement for testing required by this policy. Individuals may be asked to provide a urine or mouth sample for analysis with the specific aim of determining whether any substances may be present which could affect their safety or behaviour in the workplace.

9.7. For the purpose of the physical administration of the test the suitably qualified person to do the test may be a member of Sinoguards staff or an independent testing agency authorised by Sinoguards Operations Director.



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9.8. In the case of current Contractors or Agents, where completion of the paperwork involves disclosure of medication or history of medication is being taken, this personal information should be seen only by Sinoguards Senior Management. Information about medications taken prior to the test should be recorded at the time of specimen collection and not at any later stage.

10. Refusal to provide a sample

10.1. Whenever an individual refuses to provide a sample in accordance with this policy or in the course of screening procedure, a referral of the circumstances will be made to the Operations Director.

11. Results of evidential tests

11.1. Results will be communicated to the individual.

11.2. When the results show positive evidence of suspected illegal drug use a medical analysis of the individual case may be performed by an appropriate medical expert, taking into account all relevant factors.

11.3. Whenever a positive result identifies potential illegal drug misuse, the case will be referred to Sinoguards Operations Director for consideration of the requirement for further action. Referral to Human Resources should also be made in the case of Sinoguards.

11.4. Support and referral to other treatment processes will be made through Human Resources and there is an expectation that Contractors and Agents on the programme will co-operate. Individuals who fail to co-operate with risk assessments and rehabilitation regimes will be liable under disciplinary procedures.

12. Confidentiality

12.1. The principles of medical confidentiality will be maintained as far as possible within the spirit of the aims of the policy. Details of medical conditions and specialist/medical treatments will always remain confidential but the need to conduct risk assessments and monitor rehabilitation mean that Human Resources and Sinoguards Management will need to exchange pertinent managerial information to ensure consistency.



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Appendix A

Posts for mandatory testing:

1. Potential operational Contractors pre deployment.
2. Agents who come into contact with Sinoguards Weapons

Potential Operators during Interview Stage.

13. Equality impact assessment

16.1. This policy has been assessed with regard to its relevance to race and diversity equality. As a result of this assessment the policy has been graded as having a low potential impact.

I sign below to confirm that I have read and understand the contents of the Sinoguards Drug and Alcohol Policy and will adhere to the policy.

NAME:

SIGNATURE:

DATE:

JUNE 12TH, 2018