

# Alcohol and Other Drugs Policy

## Contents

<b>Scope</b>	2
<b>Purpose</b>	2
<b>Policy</b>	2
A Critical Safety Commitment	2
Fitness for work	2
Rehabilitation guidelines	3
Assess to EAP support	3
Self-identification	3
Requests for leave	3
Other support	3
<b>Alcohol and / or other drugs and Work</b>	4
DP World's expectations	4
Prohibited use and consumption at work	4
Prescription or over the counter drugs and self-disclosure	4
Workers compensation	4
Prohibited possession and supply at work	4
<b>Testing Procedure for Alcohol and other Drugs</b>	5
Types of Testing	5
<b>Testing Procedure</b>	5
1. Initial screening (breath for alcohol and saliva for drugs)	6
2. Confirmation screening (urine for drugs)	7
After a confirmed positive test result	8
Failure to comply with a request	8
Refusal	8
Avoidance	8
Adulterating samples	8
<b>Breaches of this Policy</b>	8
Disciplinary Action	8
Confidentiality	9
Definitions	9
Appendix A. Responsibilities	10
Appendix B. Alcohol & Other Drugs Detection Levels	12
Appendix C. Testing Procedure – flow chart	14
Appendix D. Employee Assistance Program (EAP)	15
Appendix E. Legislative References	15

## Scope

This Policy applies to all DP World Australia ("DP World") employees, agents, contractors including temporary contractors and truck drivers, visitors and anyone else permitted into the work environment for the reason of conducting work for the Company (referred to as "Employees" herein).

This Policy applies to any location, place and equipment including vehicles which are attended or used for the purposes of performing work and work-related duties. This Policy extends to all functions and places that are work related, for example, work functions and conferences.

This Policy does not form part of an Employee's contract of employment or contract for service and may be amended at any time. This Policy is subject to amendment from time to time. Any amendments to this Policy will be made in consultation with relevant stakeholders and updated as required.

## Purpose

DP World is committed to a workplace and culture that supports "zero harm" to our people and working environment. An important component of this is eliminating the risks associated with Employee use of alcohol and other drugs.

Every person who works at or visits a DP World terminal or office or nominated workplace has a responsibility to meet the Company's health and safety obligations, policies and procedures including those contained in an applicable enterprise agreement. This includes taking appropriate care of their own health and safety and the safety of others. All Employees must ensure that they are "fit for work" – that is, they are in a fit and healthy state which enables them to competently perform their duties without compromising the health and safety of themselves and others.

This Policy outlines the responsibilities of all Employees in relation to alcohol and other drugs and the processes that will be followed at all DP World sites to address the workplace safety risks associated with the use of alcohol and other drugs. DP World is committed to encouraging early intervention of alcohol and other drug dependency issues and providing support to Employees who seek assistance and rehabilitation.

## Policy

### **A Critical Safety Commitment**

The DP World Critical Safety Commitments contain the most important safety obligations at DP World which all Employees are required to follow. One of the six Critical Safety Commitments is Fit for Work. This Critical Safety Commitment details the employee expectation "I will be drug and alcohol free at work and advise of any injuries, medications or medical conditions that could impede my ability to do my job safely, before I commence work".

### **Fitness for work**

As an Employee it is your responsibility to be "fit for work". To be considered fit for work, a person must be in a state (physical, mental and emotional) which enables them to perform assigned tasks competently and in a manner which does not threaten the safety or health of themselves or others.

A person will be deemed unfit for work under this Policy if any of the following apply but not limited to:

- Where the person is working in or visiting a DP World site and the person's Breath Alcohol Concentration (BrAC) is greater than 0.00;
- The person has an amount of drugs, that is, present in their saliva and urine that exceeds the test cut-off levels as set out in Appendix B of this Policy;
- The person has any other drug in their system which a medical practitioner advises could impact that person's ability to safely perform their duties, whether or not such a drug is a prescription drug; or
- A "deemed positive" test result has been obtained (as set out at the *Failure to Comply with a Request* section of this Policy).

## Rehabilitation guidelines

DP World recognises alcohol or other drug dependency as a treatable condition. Any person who suspects that they have an alcohol and other drug dependency condition is encouraged to seek advice and to obtain appropriate medical treatment. Employees also have a responsibility to report concerns about another work colleague's ability to safely perform their duties. The use of any of the rehabilitation services contained in this Policy and any self-identification will remain strictly confidential.

### *Assess to EAP support*

The DP World Employee Assistance Program (EAP) is a referral and counselling service for Employees and their immediate family members who may need help with personal matters, whether work or non-work related.

Employees who have related problems are encouraged to seek advice and to take appropriate treatment before their work performance declines. Employees accessing assistance will not be discriminated against or disadvantaged as a result of accessing treatment. More detail is included at Appendix D including the relevant contact details.

### *Self-identification*

Where an Employee comes forward of their own volition and asks for assistance with alcohol and / or other drug dependency issues prior to a test being conducted, DP World will support them. In these circumstances an Employee Support Plan will be developed and implemented to assist the Employee's recovery and there will be no disciplinary action.

Where an Employee tests positive (whether at the initial screening or confirmatory test), it will be at DP World's discretion whether rehabilitation support is offered to the Employee. In these circumstances, disciplinary action may still be taken.

### *Requests for leave*

Employees who require leave from work to receive treatment for alcohol and / or other drugs dependency issues may be entitled to access accrued leave entitlements or leave without pay as determined by the Company.

### *Other support*

Where DP World considers it necessary or appropriate, DP World may support an employee with any alcohol and / or drug dependency issues and / or require an employee to enter into an Employee Support Plan.

Where DP World is supporting an Employee who has an alcohol or other drug dependency issue, an Employee Support Plan will be developed by the site HR Team, in consultation with the individual concerned and their relevant Manager, which the Employee will need to comply with.

Mandatory requirements to be addressed in an Employee Support Plan are:

- Negative test result to be achieved prior to return to work using the Company preferred testing provider;
- Process to be adopted to achieve a negative test result;
- Timeframe in which a negative test result is to be achieved; and
- Offers of rehabilitation assistance, i.e. referral to EAP or other specialist agency.

Additional requirements that may be addressed in an Employee Support Plan include:

- Mandatory attendance at EAP counselling (or alternative provider);
- Additional testing regimes;
- Additional supervision; and
- Any other matters/steps considered to be appropriate to the specific case/circumstances.

DP World may also offer Alcohol and Other Drugs education and training programs which may include but are not limited to general information about the adverse effects of alcohol and other drugs in the workplace and self-management options, i.e. self-testing. Additional training and tools and resources may be provided to assist managers and supervisors to deal with identifying unusual behaviour and managing persons affected by alcohol and / or other drugs.

## **Alcohol and / or other drugs and Work**

### *DP World's expectations*

No Employee will attend work in breach of the alcohol and / or other drug standards set out in this Policy as this may lead to an impairment and inability to perform all of the duties required of the Employee's position in a safe and efficient manner.

Employees must not attend for work with an alcohol or other drug level that exceeds the limits contained in Appendix B of this Policy. In summary:

- Alcohol, where the BrAC is greater than 0.00;
- Any illegal drug, as set out at Appendix B;
- Any prescription drugs or over the counter drugs as set out at Appendix B, of a kind or quantity for which might reasonably be expected to have the potential of impairing the Employee's ability to safely and efficiently perform his or her duties. This also includes but is not limited to:
  - Prescription drugs which have not been prescribed or issued to the Employee by a medical practitioner; or
  - consumption which exceeds the level which the employee has been prescribed to take or as recommended.

Other than as set out in this Policy, Employees must not be in possession of, use or consume, sell, supply, cultivate or manufacture alcohol or other drugs at work.

### *Prohibited use and consumption at work*

The use and consumption of illegal drugs and alcohol in breach of the limits contained at Appendix B of this Policy may result in disciplinary action up to and including termination of employment.

DP World's Terminal operations are alcohol free environments. In special circumstances such as the retirement of employees, End of Year functions or other similar work functions, the General Manager or Executive Leader may approve the moderate consumption and responsible serving of alcohol during and after working hours. A specified timeframe will be nominated by the General Manager or Executive Leader for the function. In all circumstances, permission is to be obtained from the General Manager or Executive Leader prior to the function.

Employees are to ensure that they do not resume duty if they are unfit to perform their work duties in a safe and efficient manner.

### *Prescription or over the counter drugs and self-disclosure*

At all times it is the personal responsibility of the Employee to ensure that they are fully fit for work and that any medication they are taking does not impact their fitness for work including their ability to pass a drug and/or alcohol test.

Employees' who are required to take medications, such as over the counter medications or prescription drugs that may impact their physical or mental alertness are required to notify their Manager or Supervisor. An Employee may also be required to seek a medical clearance from their treating medical practitioner to confirm that they are medically fit to perform their role while taking the medication.

### *Workers compensation*

Where workplace injuries are attributable to the consumption of alcohol and / or other drugs, workers compensation claims may be rejected and disciplinary action up to and including termination of employment may be taken by the Company.

### *Prohibited possession and supply at work*

An Employee must not be in possession of, store or sell, supply, cultivate or manufacture alcohol and / or other drugs at work including any other drug related paraphernalia unless:

- They are for legitimate medical or other purposes (such as training or the transportation of alcohol and / or other drugs to the General Manager or Executive Leader if found in the workplace); or
- In the case of alcohol it is for an approved work function authorised by the General Manager or Executive Leader.

Police will be contacted if an Employee is found to be in possession of, storing, selling supplying, cultivating or manufacturing illicit drugs at work.

# Testing Procedure for Alcohol and other Drugs

## Types of Testing

### *Random*

- DP World may at any time, with or without reason, conduct any number of random alcohol and other drug testing which may include at gate testing.
- Random alcohol and other drug testing shall apply to all Employees including Management, Contractors and Visitors who may be onsite at the time when testing takes place.
- All random alcohol and other drug testing will be conducted by a nominated provider with all collectors being certificated to Australian Standards AS/NZS 4308:2008 and AS/NZS 4760:2019. All Laboratory confirmations will be conducted by a NATA (National Association of Testing Authorities) Accredited provider certified to Australian Standards AS/NZS 4308:2008 and AS/NZS 4760:2019.
- The random testing will be undertaken in accordance with the Drug and Alcohol testing protocols as set out in the *Standard Testing Procedure* section below.

### *At risk / suspicion*

- Any Employee whose behaviour is considered "at risk" and there is a reasonable suspicion that the person is under the influence of alcohol or other drugs will be subject to alcohol and other drug testing, particularly but not limited to potential breaches of this Policy or breaches of an ongoing Employee Support Plan following a breach of this Policy.

### *Post-incident / injury*

- Employees involved in an incident or injury at work, particularly but not limited to incidents or injuries that result in a near miss, medical treatment and damage to property / equipment or lost time injury, will be subject to alcohol and other drug testing. The requirement for testing is at the discretion of the General Manager and HSE Manager and testing may occur on a case by case basis.

### *Target*

- An Employee will be subject to target testing where they have obtained their first non-negative test result for alcohol and / or other drugs, for a period of 12 months from the date of the first non-negative test result. The Employee may also be subject to further review at DP World's discretion and may be extended.

### *Self-testing*

- Where an Employee is concerned in any way about his or her degree of fitness for work, they must consult with their Manager or Supervisor before commencing work. In particular, any Employee who suspects that his or her BrAC could be greater than 0.00 must use one of the DP World Terminal breath testing instruments before commencing work.

## Testing Procedure

All Employees entering or working at a DP World site may be tested in accordance with the following procedures. Australian Standard AS/NZS 4308:2008 - Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine and Australian Standard AS/NZS 4760:2019 - Procedures for specimen collection and the detection and quantitation of drugs in oral fluid, is adhered to in this Testing Procedure.

If the validity of the sample cannot be established or if it is suspected that the sample may have been adulterated or substituted, then another specimen shall be collected as soon as possible using the below procedures.

The Drug and Alcohol Testing Procedure is summarised below and in the flow chart at Appendix C.

# 1

## Initial screening (breath for alcohol and saliva for drugs)

- Alcohol and other drug testing will be conducted privately and confidentially at a designated testing area by a NATA (National Association of Testing Authorities) certified provider certified to Australian Standards (“the Collector”).
- Upon arrival at the designated testing area an Employee will be required to provide an acceptable form of Identification (ID). If the Employee is unable to provide an acceptable form of ID the Certified Testing Provider will receive confirmation from a Manager or Supervisor verifying the Employee’s identification. Details will be recorded on the appropriate documentation.
- The Collector will ask an Employee whether they are under the influence or affected by alcohol and / or other drugs or over the counter or prescription drugs. This information will be recorded by the Collector.

### Alcohol

- Employees will be asked to undertake an alcohol test by using an approved breathalyser unit.
- If there is a positive screen for alcohol, the Employee will be retested within 30 minutes. If the Employee’s BrAC has decreased to zero in line with this policy, they will immediately return to work and information will be provided to them regarding the site EAP service.
- If the Employee’s BrAC has decreased, but the level is still equal to or above the relevant detection level, this will be deemed a non-negative (positive) test result and a breach of this Policy.
- An Employee will be provided with transportation to ensure the safe passage of the person to their best known residential address. If the person refuses to accept the transportation, the offer will be repeated in the present of a Senior Manager as a witness. This incident will be documented.
- The Employee will remain absent from work (either on sick leave or leave without pay) until as a minimum, a negative test is returned at the commencement of their next shift or thereafter.
- The Employee will be counselled by their Manager or Supervisor prior to re-commencement of work generally and specifically as to their individual Employee Support Plan as required, which includes the offer of assistance through referral to the EAP service.
- DP World will take such other action as is considered appropriate in relation to the Employee’s positive test result, in accordance with the *Breaches of this Policy* section of the Policy below. It will take into account the employees past history.

### Other drugs

- Employees will be asked to provide a saliva sample. The Employee will provide a saliva sample by following the appropriate process for the testing kit in use.
- Where an Employee is unable to provide a sample .i.e. “dry mouth” the Employee will be asked a second time to provide an oral sample. At this time if the 2<sup>nd</sup> test is still deemed “dry mouth” then the employee will be required to provide a urine sample for the purpose of performing the test.
- The provider may also conduct an instant “urine screening test” in accordance with Australian standards.
- After completing the saliva test, the Collector will identify whether the result is negative or non-negative, based on the testing kit indicators.

- If the drug screen is negative, the Employee will be required to return to work. If the drug screen is non-negative, based on the testing kit indicators, the Employee will be required to provide a urine sample for confirmation purposes.

## 2

### *Confirmation screening (urine for drugs)*

- If an Employee obtains a non-negative screen for drugs, the individual will be asked to go to the designated testing area where they;
  - Will be required to provide a urine sample for confirmatory testing;
  - Will be referred to their employer to determine the most adequate and safe method for them to exit the site. If the person is self-employed they will be provided with transportation to ensure their safe passage home.
- Upon receiving the urine sample the Collector will determine whether there is a sufficient sample to enable all required testing to be performed. In the event that there is insufficient urine for testing the Employee will be required to provide an additional sample.
- Both the Collector and the Employee will keep the sample in view at all times prior to it being sealed and labelled.
- The urine sample will be transferred from the collection beaker into two or three laboratory tubes in accordance with laboratory protocols. Prior to the samples being sealed for transportation to a NATA certified laboratory, the Employee will initial the tamper evident security seals on each tube to certify that it is the sample collected from them. Each tube is to contain Donor Surname and First Name, Donor date of birth, donor gender, data and time of collection and Collectors and Donors signatures. All tubes must also contain the unique Identifier barcode replicated on all copies of the paperwork.
- The Collector will request that the donor observe the transfer of the sample into the tubes, the placement of the tamper evident security seals or equivalent devices over both bottle caps and down the sides of the tubes, as well as the placement of both tubes into a tamper proof Bio-hazard bag, which will also be sealed in front of the Employee.
- All the information contained on the tamper evident security seals will be entered onto Chain of Custody documentation and will be signed by both the Collector and the Employee, certifying ownership of the sample provided as well as giving consent for the sample to be tested in accordance with the appropriate Australian Standard.

The Employee will be given a copy of the documentation at the end of the sample collection and sealing procedures for their records.

- The samples collected for laboratory confirmation purposes will be forwarded to a NATA accredited laboratory for testing in accordance with the analysis requirements set out in the appropriate Australian Standard.
- An Employee will then be provided with transportation to ensure the safe passage of the person to their best known residential address. If the person refuses to accept the transportation, the offer will be repeated in the presence of a Senior Manager as a witness. This incident will be documented.
- The Employee will remain absent from work (with pay) until the results of the confirmatory test are received.
- The nominated DP World representative will be informed of any positive alcohol or other drug screen results as soon as possible after the screen result is known.
- If the confirmatory test is negative the Employee shall return to work.
- If the confirmatory test is positive the After a confirmed positive test result process detailed below will apply.

## After a confirmed positive test result

The following steps are to be taken following a confirmed positive test result:

- The Employee tested and their Manager will be informed of the test result;
- Disciplinary discussions will take place which will include consideration as to what disciplinary outcomes are appropriate in the circumstances;
- If the result of the test is high range in accordance with the approved levels contained at Appendix B below, then the employee may be subject to termination of their employment with the Company;
- The Employee will not be permitted to return to work until they test negative to an additional alcohol and other urine drug test, which they will need to do at their own expense but they must use the company preferred testing provider to provide those results;
- While an employee is off work as a result of returning a positive test result, it will be their responsibility to keep in touch with their Supervisor about their return to work;
- The Employee will be required to undergo testing for a period of 12 months as detailed in the *Testing Procedure* section of this Policy if they remain with DP World as part of the support provided to employees as detailed above.

## Failure to comply with a request

### *Refusal*

Refusal by an Employee to submit to or cooperate fully with the administration of the Testing Procedure will be dealt with in accordance with the *Breaches of this Policy* section of the policy.

Refusal will result in the Employee being counselled on the spot as to the consequences of the refusal. The Employee will be directed to undergo the test. If the Employee continues to refuse to undertake the test, it will be dealt with as a non-negative test result (a "deemed positive test"). The Employee will be arranged transport home and be suspended from duty until the incident is dealt with in accordance with the Breaches of this Policy section of the policy. If returning to the workplace, the Employee will be required to provide DP World with a negative test before the person will be able to return to work.

Continued refusal to undertake testing in accordance with the Testing Procedure will result in disciplinary action up to and including termination of employment.

### *Avoidance*

If a person has presented for work and avoids a screening test then they will be treated as having obtained a non-negative test result.

Where an Employee avoids a screening test, upon their return to work or next rostered shift they will be required to submit to the Testing Procedure as set out above. The Employee may still be subject to disciplinary action up to and including termination of employment.

### *Adulterating samples*

Adulteration (tampering) includes the addition of any substance in-vivo or in-vitro which may compromise the integrity of the sample specimen. Where it is found that an Employee has tampered with an alcohol or other drug sample, disciplinary action will result up to and including termination of employment.

## Breaches of this Policy

### **Disciplinary Action**

Breaches of this Policy are serious and have the ability to put the health and safety of Employees and others at significant risk. Disciplinary action will be taken where an employee:

- Records a confirmed positive alcohol or other drugs screening test;
- Refuses or avoids taking a screening test for alcohol and / or other drugs;
- Adulterates with a screening test sample;
- Breaches this policy in any demonstrated way.

DP World has discretion to take the appropriate disciplinary action for breaches of this Policy which may include termination of employment. Breaches of this Policy may be considered serious misconduct which

may result in instant dismissal in particular where there is a “high range” level detected or where this is a second breach.

Contractors, truck drivers and visitors who breach this Policy or a direction issued pursuant to this Policy, may be directed to leave the site immediately and, where applicable, their employer informed of the issues. DP World may take further appropriate steps in relation to the individual, which may include but are not limited to:

- Imposing limitations on entry; and/or
- Excluding the person from entering the site for a period of time.

## Confidentiality

- DP World will take all reasonable steps to ensure that laboratory drug test results concerning any sample provided by the Employee, any investigation in relation to such test results or participation in counselling or rehabilitation services will to the extent practicably possible remain confidential.
- Employee records and information relating to all alcohol and other drug test results will not be passed on to anyone without the written permission of the Employee concerned, except:
  - As required by law;
  - As expressly permitted by this Policy; or
  - In the proper course of a person performing their job .i.e. reporting to senior management, seeking legal or other professional advice, reporting on an incident where alcohol or other drugs is a relevant factor.
- Referral to any EAP and / or rehabilitation service will remain strictly confidential for the protection of the Employee’s privacy. Records and information on the nature of the Employee’s personal problems will not be disclosed or passed to anyone without the written permission of the Employee concerned.

## Definitions

At risk	An individual who, after observation of his/her behaviour, poses a potential risk to their own health and safety and / or the health and safety of others in the workplace.
Alcohol and other Drugs (AOD) Program	A program designed for the management of a structured disciplinary process implemented as a result of an employee having returned a positive result to an alcohol and/or drug test.
BAC	Blood Alcohol Concentration.
BrAC	Breath Alcohol Concentration.
Contractor	A contractor, sub-contractor or Employee of a contractor or sub-contractor required to perform work on any worksite, including truck drivers.
Customer / Visitor	Any person, other than an Employee, contractor or truck driver, required to have access to areas in and/or about any worksite.
Detection Level	Detection levels as defined in the relevant Australian Standards or as defined by a laboratory.
Employee	An Employee employed within the DP World business (this definition includes all staff and management).
Employee Assistance Program (EAP)	A program designed to assist Employees and their immediate families with personal and/or work related problems that require counselling and rehabilitation. It is available to Employees who may have an alcohol and/or other drug dependency or other related problem(s).
Positive Result - Alcohol	A reading greater than 0.00 from an alcometer as a result of an alcohol test.
Positive Result - Drugs	Positive confirmation of a drug screen via GCMS and/or LCMS testing requirements performed by a NATA certified laboratory.
Observable Impairment	Impairment observed against a set of criterion to assist in the forming of an opinion as to the risk of impairment of an individual or others.
Other Drugs	Any chemical substance (either natural or synthetic), which alters the structure or function of the body, and/or any drug described as an illegal substance under Australian law.
Over the counter medications	Medications that can be purchased without the need of a prescription. This may include Sudafed, Codral, Panadeine and other strong pain killers.

Policy	The Alcohol and Other Drugs Policy
Prescription Drugs	Medications that are prescribed by a licensed medical practitioner.
Truck Driver	An operator of a truck (not an Employee of DP World) whether for him or herself or on behalf of a transport Company.

## Appendix A. Responsibilities

### Accountabilities and Responsibilities

To ensure that the objectives of this Policy are achieved, the specific responsibilities of Employees, contractors, truck drivers and visitors, as well as different levels of management, are set out below in the *Responsibilities* section.

#### *Responsibilities*

Employees	<p>Employees will:</p> <ul style="list-style-type: none"> <li>• Not attend or perform work with a level of alcohol and / or other drug in their system that would result in a positive test result;</li> <li>• Notify their supervisor / manager if they think they may be or are affected as a result of the use of alcohol and / or other drugs;</li> <li>• Notify their supervisor / manager if they have reason to believe another person is affected by drugs or alcohol;</li> <li>• Not consume alcohol or other drugs and / or possess, keep or store alcohol, drugs or drug paraphernalia on site;</li> <li>• Comply with the testing regime and all processes contained within this Policy;</li> <li>• Comply with all lawful and reasonable directions in relation to alcohol and other drugs testing;</li> <li>• Comply with any Employee Support Plan or other direction in relation to their ongoing employment following a breach of this Policy or other non-compliance;</li> <li>• Seek information from their doctor or other health professional on the use of prescribed drugs and over the counter medication that may impact on their ability to work safely, and, where relevant to their ability to perform their role, provide such information to DP World;</li> <li>• At all times ensure that they are fully fit for work and that any medication they are taking does not impact on their fitness for work;</li> <li>• If taking over the counter medication and / or prescription drugs that may impact on their ability to perform their role safely and to their full capacity, or to result in the Employee producing a Positive Result to a drug or alcohol test, provide the following information to DP World site management (immediately or as they become aware), <ul style="list-style-type: none"> <li>○ Whether the medication will or is likely to impair or impact on the Employees ability to perform their role; and</li> <li>○ Provide a suitable reference when required e.g. doctor, pharmacist, etc.</li> </ul> </li> </ul>
Contractors Truck Drivers Visitors	<p>Contractors, truck drivers and visitors will:</p> <ul style="list-style-type: none"> <li>• Not attend a site or perform work with a level of alcohol in their blood that results in a positive test result;</li> <li>• Not attend a site or perform work with a level of any drug in their system that results in a positive test result;</li> <li>• Notify their employer if they think they may be or are affected as a result of the use of alcohol and/or other drugs prior to attending a DP World site;</li> <li>• Notify their employer (if within their own workplace) or DP World (if on a DP World site) if they have reason to believe another person is affected by drugs or alcohol,</li> <li>• Not possess, consume, store, sell or manufacture alcohol and/or drugs when on a DP World site,</li> <li>• Not have in their possession, while on a DP World site, any other drug related paraphernalia;</li> </ul>

	<ul style="list-style-type: none"> <li>• Comply with the testing regime and all processes contained within this Policy,</li> <li>• Comply with all lawful and reasonable directions in relation to alcohol and other drugs testing.</li> </ul>
Supervisors/ Superintendents	<p>Supervisors/Superintendents will:</p> <ul style="list-style-type: none"> <li>• Comply with all directions as contained within the "Employee" responsibilities section above,</li> <li>• Assist with and monitor the ongoing implementation of this Policy,</li> <li>• Demonstrate commitment to this Policy,</li> <li>• Notify their relevant manager of identified non-compliances,</li> <li>• Assist in the communication to all Employees, contractors and others of their responsibilities in relation to this Policy,</li> <li>• Encourage Employees, contractors and others to seek assistance for problems related to the use of alcohol or other drugs,</li> <li>• Respond to any notification or concern in relation to alcohol and / or other drugs immediately,</li> <li>• Maintain confidentiality of relevant information (such as personal disclosures etc.) related to the implementation of this Policy; and</li> <li>• Without limiting the above, carry out all steps and actions required of them by this Policy and/or as directed.</li> </ul>
Managers	<p>In addition to meeting their supervisory obligations as detailed in "Supervisors/Superintendents" responsibilities, Managers will:</p> <ul style="list-style-type: none"> <li>• Comply with all directions as contained within the "Employee" responsibilities section above,</li> <li>• Communicate the requirements of this Policy to all Employees, contractors and others who may enter and/or perform work on DP World sites through such things as inductions, selection processes and usual communication forums and media,</li> <li>• Notify the site General Manager of any non-compliance and make recommendations, as required, in relation to an appropriate Company response to such non-compliance,</li> <li>• Not permit alcohol to be brought on to, kept or consumed on site,</li> <li>• Not permit drugs to be brought on to, kept or consumed on site,</li> <li>• Not permit on site any drug related paraphernalia,</li> <li>• Maintain appropriate confidentiality of all records generated by this Policy;</li> <li>• Provide adequate training and education in relation to this Policy,</li> <li>• Implement all other related programs that support the Policy, and</li> <li>• Without limiting the above, carry out all steps and actions required of them by this Policy.</li> </ul>
General Manager	<p>General Manager(s) will:</p> <ul style="list-style-type: none"> <li>• Comply with all directions as contained within the "Employee" and "Manager" responsibilities sections above,</li> <li>• Support the implementation and ongoing management of this Policy,</li> <li>• Consider circumstances of non-compliance and provide appropriate advice, and</li> <li>• Manage and/or delegate action required to give effect to appropriate Company response to identified breaches of non-compliance with this Policy.</li> </ul>
Chief Operations Officer	<p>Chief Operations Officer will:</p> <ul style="list-style-type: none"> <li>• Make the final decision in relation to cancelled or rescheduled screening tests where exceptional circumstances are present.</li> </ul>

## Appendix B. Alcohol & Other Drugs Detection Levels

These cut off levels are intended to reflect Australian Standard detection levels.

**Table 1:** Cut-off for screening with urine or saliva

Drug Class	Cut-off Level ng/ml (Saliva)	Cut-off Level ng/ml (Urine)
Opiates	50	300
Amphetamine-type substances	50	300
$\Delta^9$ - Tetrahydrocannabinol (THC) and metabolites	15	50
Cocaine and metabolites	50	300
Benzodiazepines		200
Oxycodone	40	

**Table 2:** Cut-off for laboratory confirmation with urine or saliva.

Drug Class	Compound	Cut-off Level ng/ml (Saliva)	Cut-off Level ng/ml (Urine)
Opiates	Codeine	25	300
	Morphine	25	300
	6-Acetylmorphine	10	
	6-monoacetylmorphine		10
Amphetamine-type substances	Amphetamine	25	150
	Methamphetamine	25	150
	Methylenedioxymethylamphetamine	25	150
	Methylenedioxyamphetamine	25	150
	Benzylpiperazine		500
	Phentermine		500
	Ephedrine		500
	Pseudoephedrine		500
Canabis (Majjuana, Hashish)	11-nor- $\Delta^9$ -tetrahydrocannabinol-9-carboxylic acid (TH- COOH)	5	15
Cocaine	Cocaine	25	150
	Benzococaine	25	150
	Ecgonine methyl ester	25	150
Benzodiazepines (Rohypnol)	Oxazepam		200
	Temazepam		200
	Diazepam		200
	A-hydroxy-alprazolam		100
	7-amino-clonazepam		100
	7-amino-flunitazepam		100
	7-amino-nitrazepam		100

Oxycodone	oxycodone	20	100
Synthetic compounds	As per approved synthetic panel at time of testing	As per approved synthetic panel at time of testing	As per approved synthetic panel at time of testing

The Alcohol related detection level is determined to be greater than 0.00 (BrAC) at all DP World sites.

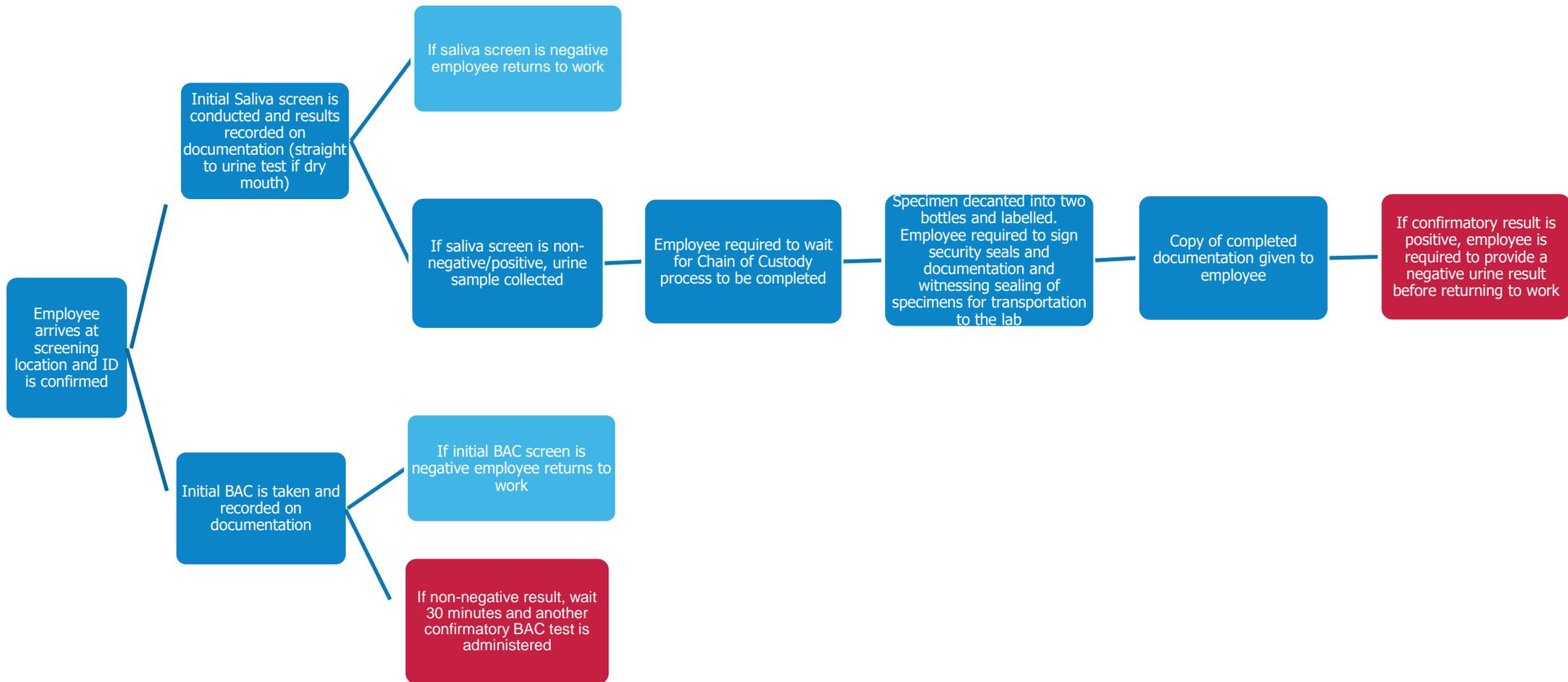
## High Range Detection Levels

Drug Class	Compound	High level result ng/ml (urine)
Opiates	Codeine	> 1200
	Morphine	> 1200
	6-Acetylmorphine	> 40
Amphetamine-type substances	Amphetamine	> 600
	Methamphetamine	> 600
	Methylenedioxymethylamphetamine	> 600
	Methylenedioxyamphetamine	> 600
	Benzylpiperazine	> 2000
	Phentermine	> 2000
	Ephedrine	> 2000
	Pseudoephedrine	> 2000
Canabis (Majjuana, Hashish)	11-nor- $\Delta^9$ -tetrahydrocannabinol-9-carboxylic acid	> 60
Cocaine	Cocaine	> 600
	Benzococaine	> 600
	Ecgonine methyl ester	> 600
Benzodiazepines (Rohypnol)	Oxazepam	> 800
	Temazepam	> 800
	Diazepam	> 800
	A-hydroxy-alprazolam	> 400
	7-amino-clonazepam	> 400
	7-amino-flunitazepam	> 400
	7-amino-nitrazepam	> 400
Synthetic compounds	As per approved synthetic panel at time of testing	As per approved synthetic panel at time of testing

The high range Alcohol related detection level is determined to be 0.06 (BrAC) or above at all DP World sites.

High range detection will be considered a serious breach of this Policy.

## Appendix C. Testing Procedure – flow chart



## Appendix D. Employee Assistance Program (EAP)

The DP World Employee Assistance Program (EAP) is a free, confidential, professional counselling service available to all DP World Employees and their immediate families 24 hours, 7 days a week. DP World has contracted independent provider, Assure Programs to provide a confidential counselling service.

EAP assists Employees and their immediate families with personal and workplace challenges that may affect work and personal life. These problems may include;

- Relationship problems
- Emotional stress
- Grief and bereavement
- Marriage and family problems
- Drug and alcohol
- Legal problems
- Compulsive gambling
- Financial problems
- Work related difficulties
- Depression or anxiety

Confidentiality of the program is maintained through licensed and qualified psychologists.

EAP is designed to encourage self-referral, however, the offer of assistance via the company EAP will be offered and encouraged by Management if it is deemed appropriate and will provide benefit to the Employee. EAP services may be a mandatory part of an alcohol and other drugs Return to Work Program.

**To make an appointment with Assure Programs call 1800 808 374 or text 0439 449 876 for SMS Counselling.**

**To make an appointment with Hunter Link call 1800 554 654**

## Appendix E. Legislative and document references

- NSW Work Health and Safety Act 2011
- NSW Work Health and Safety Regulation 2011
- QLD Work Health and Safety Act 2011
- QLD Work Health and Safety Regulation 2011
- VIC Occupational health and Safety Act 2004
- VIC Occupational Health and Safety Regulations 2007
- *WA Occupational Safety and Health Act 1984*
- WA Occupational Safety and Health Regulations 1996
- Australian Standard AS/NZS 4308:2008 - Procedures for specimen collection and the detection and quantitation of drugs of abuse in urine
- Australian Standard AS/NZS 4760:2019 - Procedures for specimen collection and the detection and quantitation of drugs in oral fluid
- DP World Global Health Safety and Environment Policy
- DP World Australia Critical Safety Commitments

Version Control			
Document Name	Alcohol and Other Drugs Policy		
Document Owner	Health, Safety, Security and Environment		
Last Review Date	November 2020	Next Review Date	November 2021
Version	4.1	Approved by	Managing Director and CEO