

POLICY FOR COMBATING AND PREVENTING ADDICTION

A – PREFACE

The Company is confronted with the problem of addiction in the workplace, both on land and at sea. It sets up a task group made up of sea and land-based employees of UES IFREMER-GENAVIR, chosen by the CHSCT Brittany and Mediterranean Centres. The group is piloted by GENAVIR's RQHSE.

At the end of the work carried out by this group, the Company decides to implement an Addiction Prevention policy.

This policy concerns GENAVIR's ships and land-based establishments.

It is issued individually to each employee of the Company, and annexed to the Company Policies and Procedures.

It is issued to each Head of Mission on board the operated vessels, and he is responsible for communicating the policy to each member of the mission.

B—THE IMPACT OF ADDICTIONS

The addictions likely to be encountered in the Company concern all psychotropic substances such as alcohol, drugs, medicines and tobacco.

They can prove harmful with regard to:

The health and safety of employees: the impact of addictions on the health of employees is always significant. In certain cases they lead to extremely serious situations, and may directly or indirectly damage the family and professional environments of those concerned.

The preservation of persons and goods: the Company and the staff, each on their own level, are accountable for the safety of the people on board their vessels, and those working within the framework of their shore-based establishments, as well as the goods entrusted to them.

The image of the Company: the development of addictions is likely to harm the image projected by the Company. This damage could prove extremely prejudicial to all employees.

The economy of the Company: the cost of evacuation someone from a boat, or of medical care, could be extremely high indeed.

C – THE POLICY

Within the framework of a general approach to wellbeing at work, health and safety, GENAVIR has decided to implement a policy aimed at preventing and combating the problems associated with the consumption of drugs, alcohol, tobacco or psychoactive products.

The goal of this policy is to reduce the number of situations that are potentially dangerous, aggressive or hazardous, as well as to reduce incidents of harassment or abuse.

All persons present in a Genavir establishment or on vessels operated by Genavir are required to respect this policy.

- Dialogue

The Company firstly intends to engage in dialogue on this subject with employees and their representatives (Union Organisations, Institutions Representing Employees).

It underlines the fact that priority should be given to raising awareness of the issues and to prevention.

To this effect, the Addiction Task Group monitors the implementation of the policy in the various departments and on board.

The group presents any suggestions that may be useful for the evolution of the policy.

The CHSCT UES Brittany and Mediterranean Centres, and the external authorities concerned, are kept informed of developments.

They meet at the request of the CHSCT.

- Help for people in difficulty

The Management and staff representatives work together in order to organise help for people in difficulty, based on contact and dialogue.

The assistance of the Occupational Physician, the Service de Santé des Gens de Mer (Seafarers' Health Service), the Social Worker, and certain designated employees of the Company may be sought (members of staff who accept on a voluntary basis to receive training regarding this issue. The staff training plan will consequently be modified).

- Conviviality

Whether on land or at sea, all celebrations of specific events must have the prior authorisation of the manager of the establishment or the captain. A selection of non-alcoholic drinks will be available so that everyone can enjoy the party spirit while respecting the alcohol limits imposed by this policy and the regulations in force.

- Illegal drugs

In the establishments and on the vessels operated by GENAVIR, it is strictly forbidden to possess, sell or consume illegal drugs in France.

- Tobacco and alcohol

The possession, sale and consumption of alcohol and tobacco in the establishments and on the vessels operated by GENAVIR are subject to regulation.

- Medicines

Employees are expected to declare the consumption of medicines that could affect their vigilance to their line managers, so that if necessary they can be placed in risk-free posts.

- In the event of a breach, or of a lack of awareness or effort on the part of employees, the hierarchy warns the individual concerned and invites him/her to contact the relevant department.

In the case of external personnel, the management will inform their employers of the situation.

D – THE MEASURES IMPLEMENTED

Prevention is the principal motivation promoted in the policy adopted by GENAVIR and the Task Group.

Consumption of alcohol

The consumption of alcohol is strictly forbidden during working hours.

Alcohol levels

In accordance with the laws and regulations in force, particularly the Convention STCW-A-Chap VIII/1-10, and in order to prevent alcohol levels that are incompatible with work requirements, GENAVIR has set a maximum alcohol level of 0.05%, or a maximum concentration of alcohol in exhaled air of 0.25mg/l for employees (equivalent to a blood alcohol level of 0.5g/l of blood).

D.1. The measures implemented on board vessels:

It is important to strike a balance between the objective of ensuring a safe living and working environment on board the vessels and maintaining conviviality.

With this in mind, the following measures will be applied:

D.1.1. Concerning alcohol:

Taking alcohol on board

It is forbidden to take personal alcohol on board without the Captain's knowledge.
The Captain is authorised to inspect luggage and containers before their embarkation.

Authorised alcoholic beverages

Wine, beer and cider are the only alcoholic drinks that may be sold on board.
Their sale will be quantitatively limited. They are defined in an internal Genavir memorandum.

Within the framework of their role as representatives, Captains may justifiably possess other types of alcoholic beverage, including spirits.

This possession will be explicitly mentioned in the summary of sales sent to the "Armement" (fitting out & supplies).

The weekly aperitifs ("days with") and the "company bottles"

The practices of the weekly aperitif (Thursday aperitif offered by the company) and the "company bottles", as well as the sale of alcoholic beverages other than those mentioned above, could be interpreted as company approval of the consumption of alcohol, and will therefore be discontinued.

Drinks parties

These may only be authorised with the formal agreement of the Captain.

Captains will nevertheless strive to limit the number of occasions, grouping birthday parties and other celebrations together, for example.

On these occasions, a member of the ADSG staff will be on duty.

The alcoholic drinks served at these drinks parties will be those authorised for sale, as well as kir.

The practice of holding alcohol-free drinks parties is strongly encouraged by the Management.

Laboratory alcohols

From 2012, and based on the rhythm of technical and maintenance layovers, Genavir will put in place a system for the safe storage of laboratory alcohols, under lock and key (locked storage cupboards, for example).

The sale of alcoholic beverages

The Maitre d'Hôtel, in his role as manager of all the drinks on board, will keep precise records of all alcoholic drinks supplied by the ship (wine, beer and cider).

In particular, he will ensure compliance with regard to:

- the inventory of stock, when loaded and unloaded, which he will stamp;
- completing the cellar 'withdrawals' log;

- times when drink may be issued from the cellar (times defined by shipboard regulations);
- the bag-in-box for distributing wine during mealtimes. Outside of mealtimes, the wine must be stored under lock and key.

The price of non-alcoholic drinks

GENAVIR is committed to a process of reducing the price of non-alcoholic drinks, so that the price for an equivalent volume will be lower than the price of an alcoholic drink. The goal of this price modification is not the generation of profit for the company.

D.1.2. Concerning drugs:

The use and possession of illegal drugs is forbidden.

D.1.3. Concerning tobacco:

The sale of tobacco is limited and defined in an internal Genavir memorandum.

D.1.4. Concerning psychoactives:

Anyone who is taking medicines that could affect their vigilance should inform the Captain, in order to prevent any risk of accidents.

REMINDER

The captain may perform targeted inspections of cabins or workstations in order to check that no drugs or bottle of alcohol have been brought on board without his knowledge. Such inspections will be carried out during working hours (except in the case of imminent danger), and will be conducted in the presence of the person or persons occupying the cabin or workstation, plus one other person of their choice.

Within the same framework, unexpected checks may be carried out on luggage, parcels and containers at the time of embarkation or on leaving the Centres.

When the Captain is aware that someone is under the influence of an addiction, he will discuss with the person in question how to best manage their addiction.

D.2. The measures implemented in the establishments on land

It is forbidden for any employee of GENAVIR or anyone acting on behalf of GENAVIR in its establishments to enter or remain in an intoxicated state or under the influence of psychoactive products.

The Manager of the establishment may, exceptionally, authorise the moderate consumption of alcohol on site for specific occasions. In these exceptional cases, the permitted alcoholic beverages are beer, cider, wine and kir.

The possession, sale and consumption of psychoactive products are forbidden.

E – DRUG/ALCOHOL TESTS

- Tests are conducted following accidents or near misses, when it appears that one of the parties involved may have been under the influence of alcohol or psychoactive products.
- On the initiative of the Manager of the establishment or the Captain when he considers that the behaviour of an individual suggests the effects of alcohol or a psychoactive substance, which could represent a threat for the person in question, his colleagues or his environment.

The employee has the right to refuse to be tested, but this creates a presumption of consumption of psychoactive substances.

The facts are described in a formal statement, which is signed by the witnesses. The statement is then sent to the Genavir Management.

If there is a recognised risk for the person concerned, his colleagues or his environment, he is removed from his post, and this is recorded in the formal statement.

E.1. Tests carried out on board

In light of the safety risks both to vessels and to persons, various testing methods (breathalysers, saliva tests, and others) are available to the Captains.

The Captain of the vessel initially carries the tests out on himself, in the presence of a witness, before then testing the individual in question.

The Captain tests the person concerned in the presence of an officer and a witness, who is chosen or validated by the person being tested. The witness may be a union representative.

The person concerned cannot return to work until the Captain of the vessel determines that his state is compatible with a return to work: demonstration, under the same conditions, of a negative test.

E.2. Tests carried out in the establishments

Alcohol tests are carried out by the Manager of the establishment, accompanied by another Manager. The employees concerned can designate another employee of the company to accompany them during the test.

Return to work can only take place after the employee has presented justification of a state compatible with work (demonstration of a negative breath test, production of a medical certificate indicating a non-alcoholic state, certificate of capability to work provided by the occupational physician...).

F – ANNUAL ASSESSMENT

These policies will be assessed on an annual basis and the results presented to the CHSCT.

Regulations concerned:

Our policy for combating and preventing addiction is based on the following regulations (available for consultation in the establishments, on board, or on the QSE intranet).

On land:

- Employment law (Article R4225-2; R4225-3; R4228-20; R4228-21; R4228-22; L1321 and succeeding; L4122-1)
- The rules and regulations of the sites where we are housed (Brest art. 104; Toulon art.105)
- GENAVIR's internal policies and procedures

At sea:

- Maritime employment law (art. 20; art. 76)
- The disciplinary and penal code of the mercantile marine (art. 1; 26.3; 30; 55; 56; 75)
- Decree 60-1193 of the 07/11/1960 concerning discipline on board vessels of the mercantile marine (art. 2)
- The STCW convention
- The programme of drug and alcohol prevention for the maritime industry of the International Labour Organisation

