

## DRUGS, ALCOHOL AND SUBSTANCES POLICY

The Directors and Management of Swire Pacific Offshore acknowledge and adopt the direction given in Section B-VIII/2, Part 5 - 'Guidance on Prevention of Drug and Alcohol Abuse' of The Seafarers Training, Certification and Watchkeeping Code (STCW Code).

No seafarer whose judgement may be impaired by alcohol, drugs or substances shall navigate a Company ship or operate its onboard equipment.

This Policy is designed to provide a safe working environment and respect the rights of individuals affected by our operations. The Company will support this with counselling and other professional measures, as appropriate.

### ALCOHOL

The consumption, carrying and possession of alcohol are prohibited on all vessels. The company adopts the guidance of the STCW Code and the **Oil Companies International Marine Forum (OCIMF)** that recommends all personnel should observe a period of abstinence from alcohol prior to performing Watch Keeping duties or work periods. In all other cases, no company personnel should be present onboard any vessel if they are under the influence of alcohol. The company interprets being under the influence of alcohol as having a blood alcohol level exceeding 50mg/100ml. However specific guidance may be found in the **OCIMF** "Guidelines for the Control of Drugs and Alcohol onboard Ships".

Notwithstanding anything in this section, the charterer or the authorities may prohibit the consumption of any alcohol at any time, including consumption ashore. Consequently the blood alcohol level should be zero for both crew members and visitors. Where the definition of zero blood alcohol requirements may be subject to local regulation and or an alternative definition under regional codes of conduct, for the avoidance of doubt the definition will be aligned with local definitions in formal use in the specific region of operations of the vessel where they exist.

### DRUGS

The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or unprescribed drugs onboard ship, or by Company shore staff, is prohibited. Persons convicted of drug offences may suffer the death penalty in a number of countries where the Company operates including Brunei, Malaysia, Saudi Arabia, Singapore and Thailand.

### SUBSTANCES

The most commonly abused substances are **organic solvents**. Solvent abuse in any form is prohibited.

### DRUGS, ALCOHOL AND SUBSTANCE TESTING

The Company reserves the right to carry out random drug and alcohol tests in support of this policy. Testing and screening for drugs, substances, and/or alcohol abuse will be conducted during routine medical examination.

Personnel ashore and afloat should be aware that the Company increasingly has to enter into contracts which include clients' rights to subject personnel to random drug and alcohol testing.

**Staff must be aware that the Company may have no control over the distribution of findings of tests conducted on behalf of clients by third parties.**

**Brian Townsley**  
**Managing Director**  
**1st January 2009**