

DRUG AND ALCOHOL POLICY

PURPOSE

The Code of Ethics of Horizon View and its subsidiaries addresses the responsibilities to its employees and other stakeholders. The purpose of this document is to explicitly address, in particular, the companies' commitment to providing a Drug and Alcohol free work environment.

The use of Drugs and Alcohol has a negative impact on the ability of employees to perform their work safely and represents a risk to the health and safety of the employees themselves and those who share the workplace with them.

The use of Drugs and Alcohol is not tolerated in the workplace and this document describes the companies' commitment to providing a safe work space. Its main objective is the prevention of all risk derived from the use of Drugs or Alcohol consumption, mentioning individual and collective responsibilities and behaviour related to the use of Drugs and the consumption of Alcohol and its consequences.

SCOPE

This document applies to all employees and managers of Horizon View and its affiliates as well as to subcontractors and suppliers.

It applies to all locations where employees work, including other locations where employees or sub-contractors move on-duty, such as in commercial visits, port areas and on board vessels, among others.

The companies to which this policy applies are the following:

- HORIZON VIEW – NAVEGAÇÃO E TRÂNSITOS, SA
- OREY COMÉRCIO E NAVEGAÇÃO, SA
- ATLANTIC LUSOFRETE - AFRETAMENTOS, TRANSPORTES E NAVEGAÇÃO, SA
- MENDES E FERNANDES – SERVIÇOS DE APOIO À NAVEGAÇÃO, SA
- STORKSHIP – NAVEGAÇÃO, TRÂNSITOS E LOGÍSTICA, SA
- OREY SHIPPING, SLU

EMPLOYEE RESPONSIBILITIES

Employees shall not use drugs (except for drugs prescribed by doctors or pharmacists) nor shall they consume alcoholic beverages in the workplace. Possession of illegal drugs or alcoholic beverages in the workplace is prohibited.

Employees will not report to the service under the influence of drugs or alcohol, which causes disruption in their judgment, their reflexes and their general ability to perform their work safely and effectively.

Employees shall not refuse to participate in alcohol and drug screening tests that are administered according to the law in force in the country.

Employees who violate this companies' policy regarding drugs and alcohol may be subject to disciplinary action in accordance with the laws and regulations of the country.

Employees must inform management or their superiors whenever there is a breach of this policy by another employee.

All employees must strictly observe this Drug and Alcohol policy and recognize that the use of drugs and alcohol jeopardizes their ability to properly perform their work, their safety and the safety of others.

Employees shall actively collaborate with management and their superiors to assist in the implementation of this policy.

MANAGEMENT RESPONSIBILITIES

The management is responsible for implementing the Drug and Alcohol policy and ensuring that all employees, subcontractors and suppliers know and understand it.

Management will ensure that no employee is admitted to the workplace under the influence of drugs or alcohol. You can also at any time determine drug and alcohol screening.

Management may terminate contracts with suppliers and sub-contractors that violate these provisions.

Management will ensure support for employees to proactively help them free themselves from drug and alcohol dependencies.

If the management or a superior suspects that a collaborator is under the influence of drugs or alcohol, he or she will not be allowed to continue in the workplace and will arrange for safe transport to the home or other suitable place, including hospital, depending the status of the employee and the perception of risk.

If illegal drugs or alcoholic beverages are found in the workplace, management should investigate the matter and try to determine the liability. In the case of illegal drugs, you shall report the matter to the appropriate authorities.

Management will encourage employees suffering from dependence on drugs or alcohol to seek help before the problem becomes a violation of this policy with its possible disciplinary consequences.

EXCEPTION - MEDICATIONS

Employees who have a medical indication to take prescription or over-the-counter drugs in pharmacy do not violate this policy. These employees should ensure that they are able to perform their duties safely and effectively. If this is not the case, you should advise your hierarchical superiors.

DRIVING COMPANY VEHICLES

The driving by an employee of vehicles and / or equipment of the company under the influence of alcohol or drugs is prohibited and any damage of his own or to third parties or his own injury to others as a consequence of not respecting this prohibition, will be entirely the responsibility of the collaborator.

VIOLATION OF DRUG AND ALCOHOL POLICY

Employees and management must always comply with this Drug and Alcohol policy.

Employees and managers who violate the provisions of this policy may be subject to disciplinary measures to the fullest extent permitted by the law of the country and may include, under consideration of circumstances, revocation of employment contract.

ADDITIONAL INFORMATION

If employees have doubts about this Drug and Alcohol Policy or about any aspect of their application, they should direct them to the human resources department, their hierarchical superiors or to the management.

DATE OF ENTRY INTO FORCE

The current Drug and Alcohol policy is effective from on February 1, 2018, replacing all previous policies.

REVIEW

This document may be revised whenever necessary or whenever legislative or regulatory changes make it necessary.

REVIEW AND APPROVAL

This Drug and Alcohol Policy was reviewed and approved by the Board of Directors.





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