

# Notice of Change to Controlled Documents #97 - 27 Aug 2012

## Summary of Changes

NOC#	Ch., Sec., SOP	Summary	Revision#
97	Ch 2 Sec 4	All employees who work offshore and all new employees hired after September 1, 2012 are required to sign a drug and alcohol release form as a condition of employment. Entire section revised to merge Employee Manual and SMM policy descriptions.	11

### NOC #97 Chapter 2 General Company Policies Section 4.0 Drug and Alcohol Policy

**Topic:** All employees who work offshore and all new employees hired after September 1, 2012 are required to sign a drug and alcohol release form as a condition of employment. Entire section revised to merge Employee Manual and SMM policy descriptions.

Revision #	Section(s)
Revision #11	<p><b>Black- original SMM wording</b>  <b>Blue- copied from Employee Manual</b>  <b>Green- added</b></p> <p><b><i>4.0 Drug and Alcohol Policy</i></b></p> <p>It is the policy of this company to maintain a work environment that is safe for employees and conducive to attaining high work standards. As part of this policy, no intoxicating beverages, illegal drugs, paraphernalia or equipment related to illegal drug use are allowed aboard vessels, in offices or other work locations of the company.</p> <p>TDI-Brooks in accordance with U.S. Coast Guard policy has a "ZERO TOLERANCE" for possession or use of any illegal drugs. TDI-Brooks International prohibits alcohol/ illegal drug possession and consumption while onboard a vessel at any time. Possession or consumption of alcohol/ illegal drugs on the vessel may result in immediate dismissal.</p> <p>Any near-misses, accidents, or suspicious behavior can trigger a drug and alcohol test.</p>

#### 4.1 Definition

A drug is any substance, natural or synthetic, which when taken into the body, is intended to bring a change in medical, behavioral, or perceptual states. All drugs are of concern to TDI-Brooks because of their effects, however, this policy is primarily concerned with drugs that are “controlled” or illegal. Alcohol is considered to be a controlled drug and is typically a liquid containing ethyl alcohol. **Illegal drugs include marijuana and similar substances, and all other drugs not prescribed by a licensed physician for use by the person possessing them.**

#### 4.2 Pre-Screening

~~Due to the requirements of many of our clients, all new seagoing TDI-Brooks personnel who are U.S. citizens will be required to undergo drug testing. Drug testing will be arranged by TDI-Brooks.~~

#### 4.2 Pre-Employment and Random Testing

**Crew members and all other TDI-BROOKS employees sailing on the vessel** are subject to pre-employment, annual and random drug and alcohol testing. **If an employee fails a drug or alcohol test, If an employee tests positive for illegal drugs or alcohol, he/she will be subject to disciplinary action, up to and including immediate termination of employment and will not be allowed to work for TDI-BROOKS until the Quality Management Representative receives the negative results of another drug or alcohol test.**

#### 4.3 Random Testing

~~All employees of TDI-Brooks are subject to random drug and alcohol testing at the discretion of management. Selected employees will be transported to a designated clinic and samples will be collected as soon as possible.~~

#### 4.4 Reasonable Cause Testing

Reasonable cause testing will be undertaken whenever a supervisor determines that there is a reasonable cause to believe that an employee is under the influence of drugs or alcohol. The supervisor will base their assumption on physical, behavioral, and performance issues.

The supervisor will complete the Reasonable Cause Testing form before the test is performed. The Reasonable Cause Testing form is located on the ship web pages on the SMM Forms Only page **and in the Appendix of the Employee Manual.**

If the crew/vessel is in a location that an employee cannot be transported to an approved clinic or hospital for testing, reasonable cause testing may be conducted aboard the vessel, and will be administered by the Master, HSE Officer or Party Chief. However, the testing may not be conducted by the person requesting it. **Shore based employees will be transported to the nearest approved testing facility.**

If an employee refuses to comply with reasonable cause testing, that employee can be removed from the job and may face termination.

TDI-Brooks does not have a Medical Review Officer. In the absence of a Medical Review Officer, the HSE Manager of TDI-Brooks, the Party Chief or the HSE Officer on board may make the decisions usually delegated to that position. **The Facilities or Office Manager will make such decisions for shore based facilities.**

The Designated Employee Representative of TDI-Brooks is a shore based position. Any reasonable cause testing will be reported to the DER and upper management as soon as possible.

Per CFR 49 Section 40.23(a), if the results of a field drug test are positive, the employee will be removed from performing safety-sensitive functions for 24 to 48 hrs. Before returning to duty, the employee must retest with negative results. Any potential disciplinary action is at the discretion of management.

#### **4.5 Searches**

Entry into or upon any vessel, office or other work location of the company is conditioned upon the company's right to search the person, personal effects and vehicle of any entrant for illegal drugs, intoxicating beverages, firearms, or possession of unauthorized property or equipment.

From time to time and without prior warning, searches by authorized company representatives may be made of anyone entering or on company premises, including vessels, or company vehicles and such searches may be made of employees as well as employees of contractors having business with the company. This search may include lockers and rooms if appropriate.

**Searches on vessels are conducted according to 33 CFR 104.265(e)(2) and 33 CFR 105(e)(2).**

When appropriate, such items discovered through these company searches may be taken into custody and may be turned over to the proper authorities. Violation of the above policy or refusal to submit to a search will be cause for disciplinary action up to and including immediate termination.

#### **4.6 Retesting**

If an employee currently working on a vessel or in a safety sensitive position ashore (such as operating heavy machinery, welding equipment or transporting equipment for company business) tests positive for drugs or alcohol, he/she will immediately stop any work and wait for further instruction from management. If deployed on a vessel, the employee will get off the vessel at the next port call. Before the employee is allowed to return to work he/she will take another drug test with the time, date and location scheduled by the Quality Management Representative.

The Quality Management Representative will not accept any second attempt drug and alcohol test results from an employee without prior knowledge of the employee taking the test. It is TDI-BROOKS' goal to obtain the results of drug and alcohol tests of all crew members before they board the vessel.

#### 4.7 Testing Facilities

Only certified facilities will be used to analyze all drug and alcohol tests. Should a test need to be administered in a foreign country, every effort will be made to assure that standard chain-of-custody protocols are followed to ensure the integrity of the tests.

#### 4.8 Acknowledgement and Release Form

**All employees who work offshore and all new employees hired after September 1, 2012 are required to sign a copy of the Acknowledgement and Release Form regarding the Drug and Alcohol Policy as a condition of employment.**

#### 4.9 Resources for Rehabilitation

At request of the employee, information on resources may be provided for the recovery of drug and alcohol abuse. Please contact the Quality Management Representative if you are interested in these resources.