

## ALCOHOL AND DRUG POLICY NEGRATIN GROUP

Negratin Group is committed to maintaining a healthy and safe working environment for all workers and subcontractors. The alcohol and drugs consumption produces effects in the organism that cause alteration of the physical and mental capacities, which greatly affect the safety, efficiency, and productivity of the worker. For this reason, it is the Negratin Group's policy to prohibit any worker or subcontractor from entering or remaining on the premises if they are under the influence of alcohol and/or drugs or if they show signs of being under the influence of such substances.

In the Negratin Group, tolerance for alcohol and drugs is zero. To comply with this commitment, the following policy has been established, which is mandatory for all our own workers and subcontractors.

- The illicit use of legal drugs or the use, possession, distribution, and sale of illegal drugs by employees and contractors on company premises or during business is strictly prohibited.
- The sale or possession of alcohol by employees or subcontractors is not permitted on company premises or during business.
- When requested by management and permitted by the laws of the country, alcohol and drug testing will be required as a requirement for entry into the company. Random alcohol and drug tests will be performed during working hours. All workers will be subject to these tests, with greater emphasis on employees in high-risk work positions.
- Alcohol and drug testing shall be performed at the request of the respective line supervisors for employees and subcontractors (where permitted by law)
- It is the responsibility of each employee to ensure that while on duty they are not under the influence of alcohol (zero alcohol), drugs or any medication that may negatively influence their behaviour.
- If the employee is under the influence of alcohol or drugs for the first time, or if the test is positive, he or she will suspend his or her daily work and report to his or her supervisor and project manager the next day, receiving a verbal and written warning (copy to HR). The first time will not be a reason for contract termination, as long as his attitude could not have caused a health and safety accident, and he can continue with his work, as long as there is future compliance.
- Being a hiring requirement, refusing medical evaluations or laboratory tests when there are reasons to suspect that the employee is under the alcoholic beverages, drugs, hallucinogenic substances influence, will also be sufficient reason to immediately impose a disciplinary penalty that will range from temporary suspension from work to the cancellation, for just cause, of the employment contract, according to the circumstances.

- The automatic cancellation of the employment contract will occur under the following issues:

- Testing positive for a second time for alcohol and/or drugs
- That the influence of alcohol and/or drugs in the performance of work, even if it is the first time that you are under such influence, may have caused an accident in your own or your colleagues' safety and health.
- The use, possession, distribution or sale of alcohol and illegal drugs on company business or premises.
- Refusal to perform on-site or laboratory tests

In the case of Negratín Group, or subcontractors, who present themselves under the influence of alcohol and/or drugs, the immediate change of the personnel involved will be required.

All personnel of Negratín Group and subcontractors will be subject to the fulfilment of this policy and will be treated under its precepts.

Finally, all workers, contractors, subcontractors who wish to be linked to the Company, will commit at the time of signing the corresponding contract, to accept and comply with the provisions of this policy by means of a note in the contract, leaving, additionally, a record of having received a copy of these policies and being committed to implement it within their organizations.

 Granada, March 2020

Approved by the Management