

DRUG AND ALCOHOL MANAGEMENT PLAN

EXECUJET MRO SERVICES BELGIUM

MANUAL

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A Dassault Aviation Company

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1. SITUATION

The present appendix contains the Declaration of Intent in the context of the preventive alcohol and drug policy in the company.

It has been drawn up in accordance with the provisions of Collective Labour Agreement No. 100 concluded in the National Labour Council.¹

The policy should cover

- Alcohol
- Illegal Drugs
- Legal Drugs (Medication)

2. SCOPE

The employer shall develop a clear, transparent and preventive alcohol and drug policy. The policy statement applies to all employees of the company, including members of the managerial staff.

The statement shall also apply to all third parties that provide services to the company in the capacity of subcontractor or consultant.

The Policy Statement applies to every work-related situation: during working hours, just before starting work, commuting, breaks and specific matters at work.

3. INFORMATION TO EMPLOYEES

Drinking a glass of alcohol has a number of pleasant effects. Many people associate it with pleasure and relaxation. But the consumption of alcohol - even sporadic - is not without danger. Alcohol has a narcotic effect on the brain. Drinking alcohol can lead to dangerous situations, impaired functioning and health problems².

The term drugs covers both legal and illegal drugs. Drugs are defined as all natural or synthetic substances that have an influence on our state of mind, and/or mental and/or physical activity. For example (non-exhaustive): cannabis, cocaine, heroin, LSD, etc.

Moreover, the possession of illegal drugs constitutes a criminal offence on the part of the employee concerned. The employer therefore prohibits the possession and use of illegal drugs in the workplace.

Certain products are not illegal drugs but can have the same negative consequences as the use of illegal drugs.

¹ CLA n°100 concluded in the NAR (National Labour Council) on 1 April 2009

² To avoid health problems and dependence on alcohol, it is advisable to follow the guidelines of the World Health Organisation:

- Women: no more than 14 standard drinks/week, no more than 2 standard drinks/day
- Men: no more than 21 standard drinks/week, no more than 3 standard drinks/day.
- No alcohol for 2 days/week

The employer also wishes to draw the attention of the workers to the fact that the intake of certain medicines can also influence the actions of the workers concerned. It is therefore of the utmost importance to scrupulously follow the instructions of the doctor in charge, and to always inform him of the specific content of the tasks to be performed. The employee can also request a spontaneous consultation with the occupational physician for specific advice on taking certain medication in combination with performing certain tasks.

The preventive alcohol and drugs policy will be introduced at ExecuJet MRO Services Belgium for the following reasons:

3.1 *Ensuring the safety of employees and customers*

EXECUJET MRO SERVICES BELGIUM is committed to ensuring the safety of employees and customers at all times, in any work-related situation. The alcohol and drug policy will be developed with the priority of eliminating and addressing safety risks due to alcohol and drug use.

3.2 *Ensuring the functioning of the employees*

With a preventive alcohol and drugs policy, EXECUJET MRO SERVICES BELGIUM also wants to prevent and remedy functioning problems caused by substance use. After all, work-related substance abuse can have many negative and undesirable consequences in the workplace: lower output, more mistakes, general reduced quality of work, more frequent absences from work, unpleasant contacts between colleagues, a bad image among clients, etc.

4. POLICY DEVELOPMENT IN PHASE 2

In order to be able to effectively and sustainably realise the objectives as described above, the employer will also develop a second phase. In this second phase, the rules and procedures to be followed shall be described in more detail. The employer shall also evaluate the policy in accordance with CAO 100, art. 14.

ExecuJet MRO Services Belgium's alcohol and drugs policy will be based on 4 pillars:

- Rules;
- Procedures;
- Assistance;
- Sensitisation and Training.

4.1 The consumption of alcohol and drugs by ExecuJet MRO Services Belgium employees is not optional, as it affects the performance of work.

At any time of the working day, the employees must be able to perform their tasks dutifully, at the required level and in compliance with the safety rules.

An employee who, due to alcohol and/or drug abuse, is unable to perform his work to the required standard and in compliance with the safety regulations is committing an error.

The general standard is that employees must not be under the influence of alcohol or drugs before and during work, where there is a risk of performance and safety problems. In addition, the employer shall draw up rules for all staff concerning:

- a) the availability of alcohol and drugs at work;
- b) the introduction of alcohol and drugs at work;
- c) the work-related use of alcohol and drugs

4.2 The employer shall lay down procedures to be followed by managers in the event of identification of dysfunction at work as a result of possible alcohol or drug use, or in the event of detection of a violation of these rules. These procedures shall contribute to a transparent and uniform approach in the follow-up of employees.

The employer wishes to pursue an opportunity policy, and will therefore in the procedure

- make a distinction between acute (one-off) performance problems and chronic (repeated) problems;
- pay attention to support and assistance for employees with problems.

4.3 The working method and procedure for establishing professional incompetence shall be elaborated. It will specify who can make this determination and how. The consequences of this determination shall also be determined.

The employer shall also lay down the working method and procedure to be followed when establishing an employee's incapacity for work with regard to the transport of the person concerned to his/her home, his/her guidance and the cost regulations.

4.4 ExecuJet MRO Services Belgium wishes to make use of specific non-medical alcohol and drug tests in this procedure. We will define which tests, who can administer them and in which situations they will be tested.

These procedures will be identical for every employee, regardless of position in the company.

4.5 The employer shall devote the necessary attention and resources to sensitising and educating employees and managerial staff.

Information on the preventive alcohol and drug policy shall also be provided to each new member of staff upon joining the company, and whenever it is deemed necessary in the context of health and safety at work.

5. ENTRY INTO FORCE

This policy and declaration of intent on alcohol and drug use takes effect on 1 April 2010. Pursuant to Article 14 of the Law of 8 April 1965 on labour regulations, this appendix is automatically added to the labour regulations of the company.

6. COMMUNICATION TO THE EMPLOYEES

This Annex shall be distributed to all employees and posted in the usual places.

Drawn up and approved on 31 March 2010

APPENDIX A: PREVENTIVE ALCOHOL AND DRUG POLICY IN IMPLEMENTATION OF THE DECLARATION OF INTENT DATED 31/03/2010.

Subject to more stringent and/or other provisions for certain categories of employees (as described in the Operations Manual), the following rules and procedures are in force within the ExecuJet MRO Services Belgium company:

1. RULES WITHIN THE ALCOHOL AND DRUG PREVENTION POLICY

In order to achieve the objectives as described in article 2 of the Declaration of Intent dd. 31 /03 /20 10. Effective and sustainable, the following rules and agreements apply within the company:

- 1.1. The general standard is that employees must not be under the influence of alcohol or drugs before or during work. The use of alcohol and drugs by EXECUJET MRO SERVICES BELGIUM employees is not optional, because it affects the performance and safety of the work.
- 1.2. The use of alcohol on the company premises and during the execution of the work is not permitted.

The controlled and limited consumption of alcohol is permitted in the following exhaustively listed situations and within the restrictions mentioned below.

- 1.2.1. Festive occasions organised by the employer (e.g. staff party, drinking at work) The employer observes the following guidelines
 - a) The employer is the only one who brings in and makes available alcoholic beverages. Employees are not to bring their own alcoholic beverages.
 - b) Sufficient non-alcoholic beverages are also provided.
- 1.2.2. Treats at work requested by an employee. The employee must have permission from the management and must observe the following guidelines:
 - a) The organising employee is the only one who brings in and provides alcoholic beverages. Employees shall not bring in their own alcoholic beverages.
 - b) Sufficient non-alcoholic beverages shall also be provided.
- 1.2.3. During external business lunches and receptions
- 1.2.4. During free hours at foreign missions

In all these situations, we expect employees to act with common sense when it comes to consumption and serving, so that alcohol consumption does not have a negative impact on

- a) performance
- b) Safety and road safety
- c) the image of the company

1.3. On the company premises of EXECUJET MRO SERVICES BELGIUM, including the car park and in every work-related situation, there is an absolute zero tolerance with regard to the use, the introduction and the making available of illegal drugs.

1.4. Use and possession for personal use of medication in work-related situations is permitted, as long as it does not cause any functioning and safety problems.

All employees taking medication which they are thought to know could lead to performance or safety problems should consult their treating doctor and follow their advice. If they wish, they may also discuss with the occupational physician whether the nature and dosage of the medication allow them to carry out their normal work. In any case, we expect that employees who are under the influence of such medication and who may not be able to carry out their normal work should inform their manager or the occupational physician before starting work, in order to be able to assess the situation properly.

1.5. An employee who does not respect these rules and agreements will be called to account by a member of the hierarchical line. He or she will report it to the HR responsible. In accordance with the existing sanctions policy, the HR manager will then consider imposing a sanction in proportion to the seriousness and possible repetition of the offence. In the case of dealing in illegal drugs in work-related situations, the employer is obliged to report this to the police.

All employees who take medication that they are thought to know about

2. PROCEDURES FOR IDENTIFYING FUNCTIONING DIFFICULTIES DUE TO SUSPECTED SUBSTANCE USE

2.1. At any time of the working day, workers must be able to carry out their duties in a conscientious manner, at the required level and in compliance with safety rules.

An employee who, due to alcohol and/or drug abuse, is unable to perform his work to the required standard and in compliance with the safety rules commits a breach of the provisions of the work regulations, to which the existing sanctions policy shall apply.

The employee shall be called to account for this by his line manager.

2.2. Any employee who is confronted with a colleague who is no longer able to function in a correct and safe way, must immediately report this to the hierarchical line, the Compliance Manager or the company confidential advisor, so that an appropriate action can be taken.

2.3. If the supervisor suspects that there is an acute incapacity to work (very serious performance or safety problems) as a result of a possible use of substances, the employee must immediately stop working, and the procedure 'establishing acute incapacity to work' will be started.

2.4. Procedure for 'assessment of acute incapacity for work':

The employee is taken to a separate room. The supervisor, together with another supervisor (highest rank present) or the prevention adviser, makes an assessment of the

work capacity. The employee has the right to be assisted by an additional witness (person present at the site).

The assessment of the work ability is made on the basis of observable functioning problems and signs of being under the influence. This is recorded in a written report. If the employee does not recognise his own incapacity to work, or in case of doubt, the procedure for non-medical alcohol and drug tests is started.

2.5. Procedure for administering non-medical tests:

- a) The tests may only be administered in the event of suspected acute incapacity for work, and only by a member of the hierarchical line or the prevention adviser (if possible, always by more than one person).
- b) Only non-medical alcohol and drug tests (breathalyser, behavioural and psychomotor tests) are involved.
- c) The employee has the right to refuse to cooperate in the procedure of taking tests. In such a case the employer shall not take any risk, and shall consider the employee acutely unfit for work.
- d) The tests may be taken at the start of work, during work, or at the end of work (for commuting purposes).
- e) The observations are recorded. They are used by the manager - together with the spontaneously observed facts - to estimate whether or not the employee has any functioning or safety problems.

If this could lead to performance or safety problems, they should consult with their attending physician and follow his advice. If they wish, they may also discuss with the occupational physician whether the nature and dosage of the medication allow them to carry out their normal work.

In any case, we expect that employees who are under the influence of such medication and who may not be able to carry out their normal work should inform their manager or the occupational physician before starting work, in order to be able to assess the situation properly.

2.6. Procedure 'removal from work' :

The decision of acute incapacity for work can only be taken by the hierarchical line . If it is not appropriate for the employee to return to his normal duties or to go on the public road by himself, the following steps are taken:

- a) Transport will be arranged to take the employee safely to his place of residence or to a doctor. The cost of any taxi ride will be borne by the employer.
- b) The hours not worked will be arranged as follows: In case of acute incapacity for work, which can be proven by a doctor's certificate, guaranteed pay is due.
- c) In other cases, the hours not worked shall be regarded as statutory leave or, failing that, as legitimate unpaid absence.

- d) When returning to work after an acute inability to work has been established, the employee concerned must always first report to his or her line manager for a performance interview.

3. ACCOMPANIMENT ARRANGEMENTS

The employees who:

- want support to discuss their alcohol and/or drug use ;
- want help to treat their problematic use of alcohol and/or drugs;

can, at their choice and in complete confidentiality, turn to:

- the occupational physician ;
- their treating doctor;
- Specialist assistance

When confronted with function problems as a result of substance use, the manager will always advise to discuss them with a doctor or counsellor and, if necessary, refer the employee to the occupational physician.

4. ENTRY INTO FORCE

This alcohol and drug prevention policy shall enter into force on 01/10/2010.

5. COMMUNICATION TO EMPLOYEES

Each employee has received a copy of this declaration of the company concerning its preventive alcohol and drug policy.

Drawn up and approved: 8 September 2010