

DRUG AND ALCOHOL USE POLICY

REVISION: 01

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1. STATEMENT

Employees are an extremely valuable resource for the TT Cables Group (hereinafter: GTTK), and their health and safety are of the utmost importance. The use of drugs or alcohol in the workplace can pose a serious threat to the health and safety of all our employees. Therefore, it is GTTK's policy to prevent the use or abuse of illegal substances from adversely affecting any of our employees. The Policy Administrator is the Head of Occupational Health and Safety.

The TT Cables Group is guided by the following principles:

- The use of illegal drugs is inconsistent with the lawful conduct expected of all citizens. Employees who use illegal drugs are typically less productive, less reliable, and more prone to absenteeism, which can lead to increased costs and work delays.
- The use of illegal drugs or alcohol can impair an employee's ability to perform duties properly, potentially causing workplace accidents.
- The use of illegal drugs and/or alcohol can affect an employee's overall reliability, stability, and judgment.

Specifically, GTTK's policy is as follows: Any use, sale, purchase, transfer, possession, or presence of any controlled substance (except medically prescribed drugs) in the body of any employee while on GTTK premises, performing work on behalf of GTTK, operating GTTK equipment, or otherwise under GTTK jurisdiction is prohibited.

In addition to ensuring occupational safety, the TT Cables Group promotes a culture of responsibility, prevention, and support for employees facing problems related to alcohol or other substance use, while respecting dignity, confidentiality, and applicable regulations.

2. PURPOSE

The TT Cables Group recognizes that the use of certain narcotic substances is illegal and that the use of drugs and other narcotics in the workplace negatively affects productivity, impairs work performance, increases the likelihood of accidents, and affects judgment and reliability. The Company also recognizes its obligation to employees, customers, and the public to take reasonable measures to ensure workplace safety, the safety of services provided, and safety in the delivery of such services.

To this end, GTTK reaffirms its Policy and the need for awareness, education, and testing related to the use of drugs and alcohol, as further set out below.

3. GENERAL PROVISIONS

3.1 Rules and Prohibited Conduct

The TT Cables Group recognizes that the use of certain drugs is unlawful and that the use of drugs and narcotics in the workplace affects productivity, impairs abilities, increases the likelihood of accidents, and affects judgment and reliability. The TT Cables Group also

recognizes its obligation to employees, customers, and the public to take reasonable measures to ensure workplace safety, the safety of the services it provides, and safety in the delivery of such services.

To this end, GTTK reaffirms its Policy and the need for awareness, education, and testing related to the use of drugs and alcohol, as further set out below.

The following actions are strictly prohibited:

- Reporting to work under the influence (active intoxication) of narcotics, illegal drugs, or prohibited substances;
- Operating GTTK equipment under the influence (active intoxication) of narcotics, illegal drugs, or prohibited substances;
- Using, producing, possessing, transferring, or trafficking such narcotics, illegal drugs, or prohibited substances in any way during working hours or while at work, on GTTK premises, or in GTTK vehicles;
- Using GTTK property or an employee's position within GTTK to produce or traffic narcotics, illegal drugs, or prohibited substances;
- Any other use, possession, or trafficking of narcotics, illegal drugs, or controlled substances in a manner detrimental to GTTK's interests;
- Where post-accident testing is required, consuming alcohol within eight (8) hours after an accident or before taking an alcohol test, whichever occurs first;
- Refusing to undergo alcohol or controlled substance testing when required as part of post-accident testing, random testing, reasonable-suspicion testing, return-to-work testing, or follow-up testing.

3.2 Applicability

All GTTK employees are subject to this Policy.

3.3 Use or Possession of Drugs/Alcohol

To ensure a safe and productive working environment at all GTTK facilities and to protect all employees and GTTK property, the use, sale, transfer, or possession of alcohol, drugs, or controlled substances during working hours is immediately subject to alcohol and drug testing procedures in accordance with GTTK Policy. The employee's immediate supervisor initiates testing based on indications set out in this Policy.

The term "under the influence" is defined as a condition in which an employee is unable to perform work in a safe and productive manner, i.e., is in a physical or mental state that creates a risk to the safety and well-being of themselves, other employees, the public, or GTTK property, and/or has a detectable alcohol level greater than 5 µg per 100 ml in the initial and confirmatory test, or any amount of illegal drugs or controlled substances in the body. A positive test will result in the employee's immediate suspension from work without pay for a period of at least thirty (30) days. The employee will be allowed to discuss the positive result with their supervisor; however, such discussion will not delay the immediate suspension and removal from duty.

Any employee taking medication or another substance prescribed by a physician for a medical condition that is known or stated to potentially impair judgment, coordination, or other sensory functions (including dizziness or drowsiness), or that may adversely affect the ability to perform work safely and effectively, must notify their supervisor before undergoing any testing.

The Company conducts a drug and alcohol testing program that includes three (3) types of testing aimed at detecting the presence of alcohol, illegal drugs, and/or controlled substances:

- Random testing
- Post-accident testing
- Reasonable-suspicion testing

4. GENERAL REQUIREMENTS OF THE TESTING PROCEDURE

The TT Cables Group will test for the following substances:

- Amphetamines – uppers, bennies, speed, and similar substances;
- Cocaine – snow, crack, flake, coke, and similar substances;
- Opiates – heroin, codeine, methadone, morphine, smack, horse, and similar substances;
- Marijuana – THC, hashish, and similar substances;
- Phencyclidine (PCP) – angel dust and similar substances;
- Alcohol.

Urine and/or blood samples will be collected from employees using medically accepted procedures, including breath alcohol testing where necessary and available. Random testing will be conducted exclusively for safety-critical positions, subject to prior risk assessment and a documented procedure for establishing reasonable suspicion. Indicators of reasonable suspicion include changes in employee behavior, speech, coordination, and other indicative signs.

5. TECHNICAL REQUIREMENTS FOR TESTING PROCEDURES

Testing will be carried out under the supervision of an authorized healthcare professional or another legally authorized institution.

The employee has the right to a confirmatory test in another authorized laboratory as well as the right to an appeal procedure.

6. DISCIPLINE AND SUPPORT

Disciplinary measures apply in the following situations and are based on “positive” test results:

- Any employee who works, reports to work, or operates a GTTK vehicle or equipment under the influence of alcohol, controlled substances, or illegal drugs will be warned

and counseled for the first incident; a second incident will result in immediate suspension, alcohol and drug testing, and may lead to termination.

- Refusal to sign the authorization form related to drug or alcohol testing, or refusal to undergo testing as instructed, is considered insubordination and will result in termination.
- Any person involved in trafficking illegal drugs or controlled substances is subject to immediate termination.
- Trafficking includes intent, actual sale or distribution of controlled substances, or possession of a quantity of prescription drugs greater than required for personal use. It also includes possession of illegal drugs or controlled substances packaged in a manner indicating intent to distribute.

No employee may perform work for GTTK, use a GTTK vehicle, or use GTTK equipment while possessing or using alcohol or illegal drugs. Such possession or use will be grounds for termination.

Employees who voluntarily report a problem with alcohol or drug use before violating this Policy may be allowed to participate in a support program without disciplinary consequences. Upon the employee's request, GTTK will assist in obtaining professional help and/or enrolling the employee in a rehabilitation program and, after successful rehabilitation, ensure the employee's return to work under supervision.

7. PERSONAL DATA PROTECTION

In processing data under this Policy, the provisions of the competent personal data protection law and related internal GTTK acts shall be strictly observed. Access to the data will be granted to the reporting person, the Company Management, and HR, and the employee will have the right to access and rectify the data. The data will be treated as confidential and restricted access is guaranteed.