GRAND CIRCLE DUBROVNIK d.o.o.

ALCOHOL AND DRUG POLICY

The Company Policy is to prevent the operation of managed ships by persons under the influence of drugs or alcohol, thereby promoting safe and efficient work conditions & public and environmental safety, and to prevent the use of managed ships for illicit drug distribution or trafficking.

REQUIREMENTS

Alcohol

The maximum acceptable alcohol concentration in the blood stream shall be MAX 0.04%. This applies to all officers and ratings, any time while at work or duty onboard the vessel.

All officers and ratings should be able to respond at any time to an emergency situation. It is therefore necessary to restrict alcohol intake also during off-duty periods onboard.

In order to ensure compliance with this policy the Master may at his discretion take appropriate measures to limit or totally eliminate the sale and consumption of alcohol onboard.

Drug

The use, possession, distribution or sale of illicit or un-prescribed controlled drugs onboard the vessels are strictly prohibited. Furthermore the misuse of legitimate drugs and the use of controlled substances which cause unacceptable job performance or unusual behavior is also prohibited. The list of banned substances includes, but is not limited to Marijuana, Cocaine, Opiates, Phencyclidine (PCP) and Amphetamines.

Testing

In order to pursue and maintain an alcohol and drug policy as outlined above the Company expects all crewmembers to participate in alcohol and drug testing.

Officers and ratings may be tested and screened for drug and/or alcohol during routine medical examinations. Drug and alcohol testing will be performed whenever it is deemed prudent or required.

Furthermore after a collision, grounding or other server casualty, officers and crew involved may be subject to testing.

Violations

Violations of the above regulations may result in immediate dismissal. Authorities may further impose severer fines and/or imprisonment.

GUIDANCE

It is required that officers and ratings observe a period of abstinence from alcohol prior to scheduled watchkeeping duty or work periods. For example this may be either a fixed period or a period based upon prior alcohol consumption requiring 1 hour of abstinence for each unit of alcohol consumed as described in the table below.

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Crewmembers shall not consume alcohol whilst on duty. Alcohol is strictly forbidden in navigation, machinery and workshop spaces.

Approximate Alcohol Unit Conversion

	Volume	Volume
Beers and Lagers:		
Ordinary Strength Beer or Lager	10 oz	1
	30 cl	1
Extra Strength Beer or Lager	10 oz	2 1/2
	30 cl	2 1/2
Spirit / Liquor:		
	1 oz	1
	3 cl	1
Table Wine:	10 cl	1
	1 liter bottle	10
Sherry or Fortified Wine:	6 cl	1
	1 liter bottle	16

In the interest of health and safety, seafarers are encouraged not to exceed consumption levels that could affect long term health.

DRUGS

The misuse of legitimate drugs or the use, possession, distribution or sale of illicit or unprescribed controlled drugs ashore or onboard ship is prohibited.

Random drug testing of personnel may be undertaken. Employment will be terminated for any person testing positive for banned substances or are convicted of a felony with respect to the possession, sale or transfer of illegal drugs inside or outside of the ship.

Any person taking drugs prescribed by a physician should bring the drugs to work in the original container. Any restrictions on their work due to the prescribed drug should be reported to the Master.

ALCOHOL

The following Policy will be strictly enforced:

- Alcohol consumption by personnel is strictly forbidden when on board and four hours prior to arrival onboard.
- Crewmembers cannot bring any alcohol beverages onboard the ship.
- Personnel may be tested for blood alcohol levels on a random basis and if it is suspected that they are intoxicated. A reading greater than 0.04% by weight of alcohol in their blood will indicate an intoxicated state. This will result in immediate dismissal.

THE COMPANY WILL UNDERTAKE DISCIPLINARY PROCEDURES AGAINST ANY ONE CONTRAVENING THE ABOVE REQUIREMENTS

Damir Ostric DPA

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