

Smartwatch Solutions provides Static Guard, Mobile Patrol, Alarm Response and Keyholding, Virtual Guard, CCTV and Access Systems & Services to a wide range of Organisations.

We are committed to providing a safe, healthy and productive working environment for all our employees, customers and visitors. This includes ensuring that all employees are fit to carry out their jobs safely and effectively in a working environment which is free from alcohol and drug misuse.

All employees are expected to arrive at work fit to carry out their jobs and to be able to perform their duties safely without any limitations due to the use or after effects of alcohol or drugs (whether prescribed, over the counter or illegal). The use of drugs also includes the use of “legal highs” or psychoactive drugs which are legal substances which have the effect of illegal drugs.

Misuse of alcohol and drugs can lead to reduced levels of attendance, reduced efficiency and performance, impaired judgement and decision making and increased health and safety risks, not only for the individual but also for others. Irresponsible behaviour or the commission of offences resulting from the misuse of alcohol or drugs may damage our reputation and, as a result, our business.

We will not accept employees arriving at work under the influence of alcohol or drugs, and/or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol or take drugs (other than prescription or over the counter medication, as directed) on our premises.

Who is Covered by the Policy?

This policy covers all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, home-workers, part-time and fixed-term employees, casual and agency employees and subcontractors and volunteers (collectively referred to as **employees** in this policy).

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Scope and Purpose of the policy

This policy is principally intended to deal with alcohol and drug problems which, in the context of this policy are any drinking or taking of drugs, whether intermittent or continual, which interferes with work performance in relation to attendance, efficiency, productivity or safety. You will be deemed to be under the influence of alcohol or drugs where that is the reasonable opinion of your Line Manager.

The purpose of this policy is to increase awareness of the effects of alcohol and drug misuse and its likely symptoms and to ensure that all employees are aware of their responsibilities regarding alcohol and drug misuse and related problems.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

1. Personnel Responsible for Implementation of the Policy

The Company has overall responsibility for the effective operation of this policy and will review it periodically.

Managers have an important role to play in identifying problems at work that are being caused or contributed to by alcohol or drug misuse. When an employee arrives at work and a manager reasonably believes that they are under the influence of alcohol or drugs, they can undertake an investigation.

If you notice a change in a colleague's pattern of behaviour you should encourage them to seek assistance through their manager. If they will not seek help themselves, you should draw the matter to the attention of your Line Manager. You should not attempt to cover up for a colleague whose work or behaviour is suffering as a result of an alcohol or drug-related problem. If you believe that you have an alcohol or drug-related problem, you should seek specialist advice and support as soon as possible and advise your Line Manager.

2. Alcohol and Drugs at Work

You should not drink alcohol during the normal working day, at lunchtime, at other official breaks and at official work-based meetings and events. Drinking alcohol while at work without authorisation or working under the influence of alcohol may be considered serious misconduct.

We expect all our employees to comply with the drink-driving legislation at all times. Our reputation will be damaged if you are convicted of a drink-driving offence and, if your job requires you to drive and you lose your licence, you may be unable to continue to do your job. Committing a drink-driving offence outside or during working hours or while working for us may lead to action under our Disciplinary Procedure and could result in dismissal.

If you are prescribed medication you must seek advice from your GP or pharmacist about the possible effect on your ability to carry out your job and whether your duties should be modified or you should be temporarily reassigned to a different role. If so you must tell your Line Manager without delay.

3. Searches

We reserve the right to conduct searches for alcohol or drugs, including, but not limited to, searches of lockers, filing cabinets and desks, company and personal vehicles, packages sent to our address, bags, and coats etc. which are on our premises. Any alcohol or drugs found as a result of a search will be confiscated and action may be taken under the Disciplinary Procedure.

4. Drug Screening

Management may reasonably request any member of staff to participate in a drug screening programme, in accordance with client requests.

Smartwatch Solutions shall undertake Drug and Alcohol screening under the following circumstances:

- Rail infrastructure pre-employment (refusal to participate in such a screening may result in your offer of employment to be withdrawn).
- Following an incident where drugs / and or alcohol may be considered as a contributing factor.
- Where there is cause to suspect that an employee is using or is under the influence of drugs and / or alcohol.
- Random Drug and Alcohol screening shall take place, involving 20% of all Sentinel competency card holders, on an annual basis.

For the avoidance of doubt, in cases where there is reasonable cause to suspect that an individual's performance is impaired as the result of drug misuse they will be asked to participate in a drug screening programme.

Failing or Refusing to undertake Drug and/or Alcohol screening may be considered as reasonable evidence of a positive test for the purpose of this program.

Drug screening will be conducted by an external provider. The Company will undertake breathalyser tests. Arrangements will be discussed with affected members of employees at the start of each screening programme.

5. Management of Suspected Substance Misuse

If your Line Manager has reason to believe that you are suffering the effects of alcohol or drugs misuse (including "legal highs"), for example, due to deterioration in your work or behaviour, they may invite you to an investigatory interview. The purpose of the interview is to discuss the reason for the investigation and seek your views on, for example, the deterioration of your work performance and/or behaviour.

If, as the result of the interview, your manager continues to believe that you are suffering the effects of alcohol or drugs misuse the matter may be dealt with under our Disciplinary Procedure.

If, having acknowledged an alcohol or drug-related problem, you undertake treatment and or rehabilitation; we may at our discretion decide to suspend any ongoing action against you for related misconduct or poor performance, pending the outcome of the treatment.

6. Providing Support

Alcohol and drug-related problems may develop for a variety of reasons and over a considerable period of time. We are committed, in so far as possible, to treating these problems in a similar way to other health issues. Support will be provided where possible with a view to supporting a full recovery, allowing a return to work and the full range of your duties. This may include:

- a) referral to appropriate treatment providers, where necessary in conjunction with your GP.
- b) time off work to attend treatment as recommended by your GP or specialist.
- c) adjusting your duties or other support as recommended by your GP or specialist during treatment and for an agreed period thereafter, subject to operational requirements and feasibility.

If you do not finish a programme of treatment (either because the treatment provider ceases to support you or because you stop attending) or your recovery and return to work does not happen as anticipated at the outset of a course of treatment, your Line Manager will meet with you to decide what further action should be taken.

7. Gross Misconduct Offences

The following is a non-exhaustive list of gross misconduct offences:

- a) Being in possession of any alcohol or non-prescribed drugs whilst on duty;
- b) Being under the influence of alcohol or non-prescribed drugs or prescribed drugs which affect your ability to perform your duties whilst on duty without having cleared this with your Line Manager;
- c) Any act of drunkenness;
- d) The selling, possession of or use of any controlled substance or dangerous drug or prescribed drug;
- e) Gross negligence, gross dereliction of duty or gross incompetence endangering the health or safety of the employee or any other persons or the property of the Company, its employees, customers or other persons;
- f) Willful, flagrant or persistent refusal to submit to any medical test (including blood and/or urine tests for the presence of alcohol or drugs) or medical examination requested by the Company in the course of employment;
- g) Unreasonable refusal to give consent to the results of any medical examination, assessment or evaluation or tests being disclosed to a senior member of management;
- h) Flagrant or persistent refusal to submit to a search when lawfully requested to do so.

8. Prescribed Drugs

Drugs prescribed by a registered medical practitioner or purchased over the counter may create cause for concern because they may impair mental or physical performance in the job. Employees who have been prescribed drugs should keep them in their original container which identifies drug dosage, date of prescription and

prescribing chemist or hospital. Any employee taking prescribed medication which adversely affects job performance must notify their immediate Manager prior to starting work. Any restrictions on work will be discussed with the individual and their supervisor.

9. Confidentiality

We aim to ensure that the confidentiality of any member of staff experiencing alcohol or drug-related problems is maintained appropriately by the Company, its managers, supervisors and, where it is necessary to inform them, colleagues. However, it needs to be recognised that, in supporting staff, some degree of information sharing is likely to be necessary.

If you seek help with an alcohol or drug-related problem from the Company without the knowledge of your Line Manager the matter will be treated confidentially unless, in our opinion maintaining confidentiality could put you, your colleagues or anyone else at risk. In those circumstances we will encourage you to inform your Line Manager and give you sufficient time to do so before sending them a written report advising of any potential risks. You will be given a copy of this report when it is sent to your Line Manager.

10. Drinking and working away

If you are required to work away and stay away overnight, you should not consume more than two pints of beer, or the equivalent alcohol, during your overnight stay. This is because Smartwatch have a duty of care to our staff and those they encounter whilst working away. Restricting the consumption of alcohol is therefore in the best interests of both the employee and the company.

Drinking any alcohol in excess of this limit while working away without authorization from a member of the Senior Management Team may be considered serious misconduct. For clarity, the Senior Management Team is made up of Head of Sales, Head of Operations, Head of Virtual Services and Head of Accounts & Business Services. Please see the organisation chart for further details.

11. Rail

Smartwatch Solutions is committed to enforcing an effective Drugs and Alcohol Policy in accordance with the requirements of Railway Group Standard RIS-8070-TOM and Network Rail Drugs and Alcohol policy. We embrace the importance of this policy and supporting documentation in the contribution towards ensuring the health and safety of our employees and others who may be affected by our works.

It is a requirement of Smartwatch Solutions Ltd and sub-contractors representing Smartwatch Solutions Ltd that no employee shall:

1. Report or attempt to report for work having just consumed alcohol or being under the influence of drugs;
2. Report for work in an unfit state due to the use of alcohol or drugs;
3. Be in possession of alcohol or drugs in the workplace, unless authorised by management, or supply or attempt to supply them in the workplace;

4. Consume drugs and / or alcohol while at work, unless authorised by management;
5. Use prescribed or over the counter medication while working on Network Rail Controlled Infrastructure without informing the person in charge.
6. Rail infrastructure pre employment (refusal of consent to such a screening / examination will result in Smartwatch exercising their right to terminate employment)
7. Following an incident where drugs / and or alcohol may be considered as a contributing factor.
8. Where there is cause to suspect that an employee is using or is under the influence of drugs and / or alcohol.
9. Unannounced Drugs and Alcohol screening shall take place, involving 20% of all Sentinel competency card holders on an annual basis from Jan to Dec.
10. Refusal to undertake Drugs and Alcohol tests will be considered a positive result with the appropriate action taken against the individual.

Signed:

Position: Managing Director



Name: Neil Jones

Date: 30/07/2025