

Policy Statement:

LuNa Smelter is committed to providing a safe and healthy working environment for all employees. This policy aims to prevent alcohol and substance abuse in the workplace and to ensure that employees are aware of the risks associated with such behavior.

Scope:

This policy applies to all employees, contractors and visitors of LuNa Smelter during working hours and while on company premises.

Policy Guidelines:

- 1. Prohibition:** The possession, use, sale, or distribution of alcohol, illegal drugs, or controlled substances, including prescription medications not prescribed to the individual, is strictly prohibited on company premises, including all mining sites and associated facilities.
- 2. Impairment:** Employees are prohibited from reporting to work or engaging in work-related activities while impaired by alcohol, illegal drugs, or controlled substances that could affect their ability to perform their duties safely.
- 3. Prescription Medications:** Employees who are prescribed medications that may impair their ability to work safely must inform their immediate supervisor. Alternative work arrangements may be considered in such cases.
- 4. Testing:** LuNa Smelter reserves the right to conduct random drug and alcohol testing, as well as testing in cases where impairment is suspected due to reasonable cause. Refusal to submit to such testing may result in disciplinary action.
- 5. Confidentiality:** All drug and alcohol testing results will be kept confidential to the extent permitted by law.
- 6. Counseling and Rehabilitation:** LuNa Smelter supports employees who seek help for substance abuse problems. Employees are encouraged to seek assistance voluntarily. Resources and referrals for counseling and rehabilitation will be provided.
- 7. Consequences:** Violations of this policy may result in disciplinary action, up to and including termination. In certain cases, legal action may be taken if a violation involves illegal activities.

Education and Awareness:

LuNa Smelter will provide education and awareness programs to inform employees about the dangers of alcohol and substance abuse and the resources available for seeking assistance.

Review and Revision:

This policy will be reviewed periodically to ensure its effectiveness. LuNa Smelter reserves the right to amend this policy to meet changing legal requirements or to enhance its effectiveness.



Joseph BUTERA
MANAGING DIRECTOR

15th January 2024
DATE

CONTROLLED