

DRUG AND ALCOHOL POLICY

Introduction

Silversea Policy is to prevent the operation of ships by persons under the influence of drugs or alcohol and the use of ships for illicit drug distribution or trafficking.

All joining Crew Members are provided with this policy and required to carry out pre-joining e-learning regarding Drugs and Alcohol. All joining Crew Members sign an Acknowledgment of Company Policies indicating that they have read and understood the content.

- ❖ Silversea have a zero tolerance policy relating to the possession and/or consumption of illegal drugs
- ❖ Silversea have a strict policy relating to alcohol use. No Crew Member can have a Blood Alcohol Concentration of 40mg/100ml (0.04%) (Breath Alcohol Limit of 180 ug/L or 0.18mg/L) or more at any time onboard
- ❖ The Consumption and/or possession of liquor with 21% alcohol content or above is not permitted at any time

At Silversea, we:

- Set the highest standards of safe ship operation, Crew health and Crew welfare
- Perform drug and alcohol testing whenever it is deemed prudent or required
- Identify a drug or alcohol test as positive by default where a Crew member refuses to be tested
- Preclude a person from employment if there is a positive drug test by a licensed laboratory prior to embarkation
- Maintain strict crew bar opening times and rules for the control of alcohol consumption
- Dismiss a crew member under the disciplinary Code of Conduct in the event of a positive drug test, possession, distribution or trafficking of drugs (or failure to report knowledge of such action) or a serious breach of alcohol regulations
- Fully support law enforcement agencies in the eradication of drug distribution and trafficking by alerting them to any evidence found on managed ships and supporting legal proceedings against individuals implicated

Responsibilities

The Master is responsible for the implementation of the Company's Drug & Alcohol Policy and for ensuring that all Crew members are aware of this policy.

The Staff Captain shall ensure that trained personnel and testing equipment are available onboard.

All Officers and Crew are responsible for following and implementing this policy as well as reporting any breach of the policy.

Definitions

Acceptable evidence of drug abuse or alcohol intoxication includes, but is not limited to any of the following:

- Observation by an Officer of an individual's manner, disposition, speech or behaviour (preferably confirmed by another Officer or Supervisor)
- A drug test collected by a trained person onboard (e.g. Ship's Doctor or Security Officer) or a competent service company or a licensed laboratory ashore.
- A chemical or breathalyser alcohol test conducted by an appropriately trained person onboard (e.g. Ship's Doctor or Security Officer) or a competent service company or a licensed laboratory ashore.

SAMHSA - Substance Abuse & Mental Health Administration in the United States.

DRUG – a controlled substance (as classified by SAMHSA) the use of which is prohibited by either a US or EU Flag State Authority, other than alcohol.

DRUG CONCENTRATIONS – may be expressed as a qualitative positive or negative result or a concentration in urine measured in nanograms per millilitre (ng/ml).

CUTOFF LEVEL – the level used to distinguish the concentration at which a drug test is deemed positive and below which it is negative, as established and revised by SAMHSA.

ALCOHOL CONCENTRATION - may be expressed either as blood alcohol concentration (BAC) by weight measured by mg/100 millilitres or % or as breath alcohol concentration (BrAC) measured by breath analyser calibrated in terms of blood alcohol concentration (BAC). The amount of alcohol measured by BrAC is generally accepted to be proportional that present in blood at a rate of 1:2100).

UNIT OF ALCOHOL - a quantity of alcohol that on average will dissipate within one hour of consumption.

Regulations

Crew members shall comply with international, flag, port state and company regulations regarding drug usage, possession, distribution and trafficking. A Crew member shall not possess an illegal drug nor assist or participate in any drug distribution or trafficking. The use of an illegal drug by a Crew member is prohibited and the Ship's Doctor must approve any medication or drug used by a Crew member.

No liquor or spirits with alcohol content above 21% is allowed in any Officer or Crew cabin or other crew areas including the Crew Bar. Crew Alcohol below 21% volume, such as beer and wine **Beer and wine, can be tolerated** in moderation provided the limit below is not violated.

The Blood Alcohol Concentration limit will be checked for embarking crew via approved testing centres and will be noted on Form C601A (Selection & Engagement Checklist).

Port state regulations and ship management contracts that impose more severe limits shall be observed.

Crew members shall not consume alcohol whilst on duty and alcohol is strictly forbidden in control centres, machinery spaces and workshops.

Crew members with navigation duties (includes all deck and engine watch keepers) shall observe a period of abstinence before duty of at least one hour for each unit of any alcohol consumed. Additionally, watch keepers are not allowed in passenger or crew bars for two hours before duty.

Notwithstanding the limits and regulations imposed above, a Crew member's ability to perform navigation, safety or emergency duties shall not be impaired by the use of drugs or alcohol at any time.

Gangway security guards shall carry out random searches of ship staff coming up the gangway for bringing drugs or alcohol onboard from shore. These searches shall be undertaken at the discretion of the security guards when there is sound reason to believe of such activities and shall be performed in line with the Ship Security Plan procedures. These searches apply to ship staff (including contractors sailing on board) and visiting shore staff. Temporary visitors to the vessel (e.g. Pilots, agents, port authorities) are exempt.

Any alcohol purchased ashore must be submitted to the Security Officer, Security Guard or HR Manager for checking and to be provided with a sticker.

A Crew member selected for drug or alcohol testing is required to participate.

Testing

The Master, Officers and crew may be subject to unannounced drug and alcohol testing as directed and arranged by the Company on a prescribed or random basis.

Note: The test schedule described in this section shall be followed in the same extent by ships not in operation i.e. such as undergoing extensive repairs/ refitting, lay up periods etc.

For alcohol testing the Company has adopted the following schedule across the fleet:

- Mandatory shipboard alcohol testing will be performed monthly
- The Staff Captain will arrange for crew random selection using the alcohol test xsl matrix
- Master, Staff Captain and Chief Engineer will be tested more regularly in the course of their contract on board, as seniors "leading by example" for the crew

Non-mandatory (recommended) independent (external) alcohol testing:

- will be performed twice per year subject to Owner's approval
- the assigned DPA will arrange external testing facility at convenient pre-agreed with the Company rate and get Owner's approval
- The Master has authority to require drug and alcohol testing of any Crew member where there is reasonable "cause" to believe that the above regulations have been breached. The Crew member is to be advised at the time that the test is due to "cause"

In the event of an incident that is "reportable" to the flag administration or port authorities, the Master shall arrange for those involved to be tested for drugs and alcohol and shall confirm to the Company that such testing has been initiated.

In the event of a "Serious Marine Incident" - 46 CFR 4.03-2 (all links to CFRs are to external sites) in USA territorial waters, the Master shall arrange for those "directly involved" - 46 CFR 4.03-4 (includes those who may have contributed to the incident) to be tested for drugs and alcohol - 46 CFR 4.06-3.

The Company will appoint a competent service company qualified to perform drug and alcohol testing in the USA for vessels that trade there.

In the event that the service company cannot attend within the time prescribed (a maximum of 2 hours for alcohol testing and 32 hours for drug testing, unless deferred for safety concerns, see 46 CFR 4.06-3), qualified/trained persons (46 CFR 4.06-20) shall be available onboard with sufficient "accessible" and "conforming" testing equipment and chain of custody forms (46 CFR 4.06-15 and 49 CFR 40).

Alcohol tests may be chemical or breathalyser type conducted by an appropriately trained person onboard (e.g. Ship's Doctor or Security Officer) or a competent service company may be contracted to perform testing.

Where possible, positive results from such a test onboard should be confirmed by sending a urine or blood sample for corroborative testing at a laboratory ashore.

Drug tests may be qualitative (producing a positive or negative result) conducted by an appropriately trained person onboard (e.g. Ship's Doctor or Security Officer) or a competent service company may be contracted to perform testing.

Where possible, a positive result from such a test onboard should be verified by sending urine, blood or other sample for corroborative testing at a licensed laboratory ashore and a Medical Review Officer should then interpret and confirm the result after conducting an interview with the crew member to examine alternative explanations (e.g. use of legally prescribed medication).

The testing facility onboard must have the necessary privacy, equipment, supervision and security for a sample to be collected and stored.

The results of Drug and Alcohol tests performed onboard shall be recorded in form C605A "Drugs and Alcohol Test Record" and send to the office (to the Crew Manager cc DPA) each month regardless of the test results.

A "Chain of Evidence" should be followed and recorded for any drug or alcohol test samples taken on board and then retained until sent to a laboratory ashore.

Breaches of drug and alcohol regulations, including test results and disciplinary actions, are to be recorded on a crewmember's personnel file.

Alcohol Consumption and Abuse Guidance

Alcohol consumption should be a matter of personal control and self-discipline.

All officers and crew must be aware that emergency duties may be required at any time and therefore discretion should be exercised at all times, especially in passenger areas where some passengers will view the consumption of alcohol adversely.

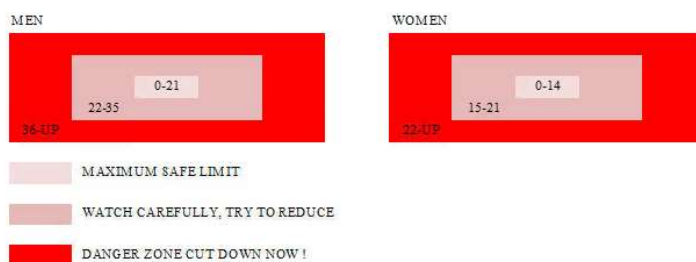
The approximate alcohol unit conversions in the table below relate to a person of average build and height.

The table shows that the consumption of more than two (2) units of alcohol within one (1) hour would result in a blood alcohol concentration (BAC) greater than 40 mg/100ml (0.04%), the maximum permitted at any time under the regulations above.

It takes one (1) hour for the body to reduce the blood alcohol level to zero after one (1) unit of alcohol is consumed.

Beverage	Quantity	Approximate Alcohol Units
Alcohol	15 mg / 100ml (in blood stream)	1
Ordinary beers, lagers or ciders	½ Pint / 10 oz / 30 cl	1
Extra Strength beers, lagers or ciders	½ Pint / 10 oz / 30 cl	2
Spirits/Liquor	1 oz / 3 cl (small shot)	1
Table Wine	10 cl (small wine glass)	1
Sherry or Fortified Wine	6 cl (small sherry glass)	2

The Weekly Alcohol Units Limit Table below is guidance for avoiding long term adverse medical effects from alcohol abuse.



Drug Abuse Guidance

Test kits of the qualitative type should refer to the SAMHSA cut-off levels.

The below drugs and limits will be checked for embarking crew via approved testing centres and will be noted on Form C601A (Selection & Engagement Checklist).

For more information refer to section Crew Employment.

Test results from laboratories ashore should be assessed against SAMHSA cut-off levels.

SAMHSA 2010 cut-off levels (confirm current levels whenever required).

Initial test analyte	Initial test cutoff concentration	Confirmatory test analyte	Confirmatory test cutoff concentration
Marijuana metabolites	50 ng/mL	THCA ¹	15 ng/mL.
Cocaine metabolites	150 ng/mL	Benzoylcegonine	100 ng/mL.
Opiate metabolites			
Codeine/Morphine ²	2000 ng/mL	Codeine	2000 ng/mL.
		Morphine	2000 ng/mL.
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL.
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL.
Amphetamines ³			
AMP/MAMP ⁴	500 ng/mL	Amphetamine	250 ng/mL.
		Methamphetamine ⁵	250 ng/mL.
MDMA ⁶	500 ng/mL	MDMA	250 ng/mL.
		MDA ⁷	250 ng/mL.
		MDEA ⁸	250 ng/mL.

¹ Delta-9-tetrahydrocannabinol-9-carboxylic acid (THCA).

² Morphine is the target analyte for codeine/morphine testing.

³ Either a single initial test kit or multiple initial test kits may be used provided the single test kit detects each target analyte independently at the specified cutoff.

⁴ Methamphetamine is the target analyte for amphetamine/methamphetamine testing.

⁵ To be reported positive for methamphetamine, a specimen must also contain amphetamine at a concentration equal to or greater than 100 ng/mL.

⁶ Methylenedioxymethamphetamine (MDMA).

⁷ Methylenedioxyamphetamine (MDA).

⁸ Methylenedioxyethylamphetamine (MDEA).

Common drugs, abbreviations and the time the drug may remain in the body:

Name	Abbreviation	Drug detection time (days)
Marijuana	THC	14 - 30
Cocaine	COC	2 - 5
Phencyclidine	PCP	3 - 8
Opiates/Morphine	OPI	2 - 5
Amphetamines	AMP	2 - 6
Methamphetamines	MET	2 - 6
Barbiturates	BAR	3 - 8
Benzodiazepines	BZO	2 - 14
Methadone	MTD	2 - 8
Tricyclic Antidepressants	TCA	10
Buprenorphine	Suboxone	2 - 3
Ecstasy	MDMA	5 - 7
Propoxyphene	PPX	2 - 3
Oxycodone	OXY	2 - 5

Unlawful Drug Possession Guidance

In the event of a drugs discovery, make the area secure and at the Captain's discretion:

- In port, notify the authorities
- At sea, notify the authorities at the next port of call before entering territorial waters
- At sea the Captain/Staff Captain and a Senior Officer (as witness) should take the following action in the presence of the alleged offender
- **Photograph the substance, undisturbed, in the area located**
Limit handling and take precautions to avoid disturbing fingerprint evidence
- Remove the substance and wrappings to a secure place, under guard if necessary
- Consider searching any similar locations that may contain drugs
- As soon as possible, write a detailed report (signed by the Captain with date and time) recording the facts (date, time, location, quantity, person in possession, person detecting substance, witnesses), reason for inspection (routine / suspicious activity / maintenance), witness statements, sketches/plans, etc.
- **Record the facts in the Official Log Book**

Authorities may be provided with a copy of the Official Log Book entry and at the Captain's discretion, a copy of the report. Prohibit shore leave until interviews are completed.

The Master is to inform the Company of any drugs discovery as soon as possible.

Prevention of Trafficking Guidance

During rounds and inspections, officers are to be aware that the ship may be used for drug smuggling, especially when trading in an area of known risk.

Areas of the ship that could be used to conceal drugs are to be periodically inspected. If there are any particular grounds for suspicion, intensive searches should be carried out as per the Ship Security Manual, particularly of crew accommodation.

The Captain is to comply with any reasonable request from a Customs Authority for relevant and available information concerning a crew member.

Authorities may inspect the ship accompanied by officers with access to relevant areas.

Stringent security is required in port re access to the ship and authorisation of visitors.

The Ship Security Plan should give further details on the prevention of drug trafficking.