

MANAGEMENT POLICY REGARDING ALCOHOL AND DRUG USE

PER.PIC is committed to maintaining a healthy and safe work environment for all while also recognizing that the abuse, or misuse, of alcohol, drugs, or other similar substances by employees adversely affects their efficient work performance while also having serious and detrimental consequences on work safety.

The misuse of illegitimate drugs or the use, possession, distribution or sale of illicit drugs, or drugs subject to control and not prescribed by a doctor, on the premises where the organization carries out its activities is strictly prohibited and is grounds for appropriate disciplinary action up to and including potential dismissal.

The possession, use, distribution or sale of alcoholic beverages on company premises is not permitted.

Being unfit to conduct business as a result of the use of drugs or alcohol is strictly prohibited and is grounds for appropriate disciplinary action up to and including potential dismissal. As much as this policy explicitly refers to alcohol and illicit drugs, it should be understood to apply to all forms of substance abuse.

PER.PIC recognizes alcohol and drug addiction as a treatable condition. Those who believe they may have a possible problem with addiction to the above substances are urged to seek medical advice and carry out appropriate therapeutic treatment without delay and before such addiction may adversely affect their ability to work. No employee with alcohol or drug addiction will be dismissed following a request for support in overcoming said addiction or if involved in a rehabilitation program. Nonetheless, a colleague who has had or presents a problem with addiction will not be permitted to cover certain work assignments identified by the Act and the company as critical to the safety and well-being of colleagues and all parties involved. Colleagues who have joined and finished a rehabilitation program will be required to participate in an aftercare program in collaboration with the appropriate physician. In the event that a colleague violates the provisions of this policy, appropriate disciplinary action will be taken. Succidation will not be avoided by concurrently requesting therapeutic treatment or a rehabilitation program. In the event that a colleague addicted to the above-mentioned substances refuses to perform a rehabilitation program, or fails to respond positively to treatment, or is no longer able to perform his or her work activity at the proper levels of efficiency for this reason, appropriate disciplinary action will be taken. The company reserves the right to conduct unannounced checks on the existence on its premises and worksites of drugs and alcohol. PER.PIC requires employees, in the manner prescribed by Legislative Decree 81/08 to undergo medical examinations or verification of alcohol or drug intake or dependence. Periodic checks or on a causal basis will be conducted to employees who occupy certain work positions for which verification is required by law. Any positive result of the check or the employee's refusal to submit to a drug or alcohol test shall be grounds for appropriate disciplinary action. Personnel of organizations that in any form or manner cooperate with the company will also be subject to the provisions of this Policy.

Management reserves the right to request the respective Employers or competent authorities for the removal from its premises of third party personnel who are in situations that constitute a risk as outlined above and may deny them future access.