

National Grid

**Global Drugs and Alcohol
Policy**

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1.0 Introduction

1.1 Purpose

National Grid recognises the prime importance to the Company of protecting the safety, health and welfare of its employees and seeks to maintain a safe, healthy and productive working environment for all employees, customers, contractors and visitor involved with its operations

2.0 Objective and Scope

2.1 Objective

2.1.1 The objective of this policy is to maintain a working environment free from the effects of drugs and alcohol. Whilst National Grid has no intention of intruding into the private lives of its employees, or preventing them from taking the medicine that they may need to stay safe and healthy, the Company does expect employees to report to work fully able to perform the duties of their job safely and effectively.

2.1.2 The policy also aims to both assist in the early identification of drug and alcohol related problems and to provide support to employees to seek and accept help. This will be achieved by providing a framework which employees feel able to seek advice, help and support and by ensuring employees are treated consistently.

2.1.3 This policy will also help ensure that we are able to discharge our general duties under;

- The Health and Safety at Work etc Act 1974 (UK)
- Occupational Safety and Health Administration (OSHA) requirements and the specific testing requirements of the Department of Transport (DOT) Federal Motor Carrier Safety Administration (FMCSA), and the Pipeline Hazardous Materials Safety Administration (PHMSA) Drug and Alcohol Program. (US)

This policy also takes into account other legislative and best practice requirements aimed at improving health and safety.

2.2 Scope

2.2.1 This policy statement applies to all businesses within National Grid. For Associate Companies and Joint Ventures National Grid will seek to promote the adoption of policies consistent with the requirements set out in this document.

2.2.2 This policy statement covers all employees. Contractors engaged by National Grid will be expected to adopt and observe policies to the same high standard.

3.0 Policy/Implementation Framework

3.1 It is the policy of National Grid that we have a workplace free from the effects of drugs and alcohol. No employee or contractor employee may work if they are under the influence of alcohol or drugs.

3.2 National Grid believes that all work related illnesses and injuries are preventable and that employees who are at work and under the influence of alcohol or drugs are a risk to the health and safety of themselves and others. In addition to absenteeism and accidents, drugs and alcohol use can adversely affect performance, productivity and workplace morale. Colleagues may feel that they have to cover up, or work harder because of someone's alcohol or drug use. Ultimately an employee with an alcohol or drugs problem may lose their job and/or suffer devastating effects on their health.

3.3 The controlled use and possession of prescribed and over the counter medicines for personal use is recognised as an exception within the policy and the actions required by employees in respect of this are described in section 5.2.

3.4 National Grid has a duty to safeguard its employees and the public from the risk of harm from employees who work under the influence of drugs and alcohol. Similarly, employees who are working under the influence, and employees who know that a fellow employee is working under the influence, owe such a duty. The failure to honour that duty by taking the right steps to prevent this risk can result in legal liability for the company and for its individual employees.

3.5 The following principles provide a framework for a workplace where people do not work while under the influence of alcohol or drugs.

- All employees and contractors are responsible and accountable for ensuring that they are not under the influence of alcohol or drugs when carrying out work for the Company.
- Managers and supervisors are responsible for taking appropriate action where they identify individuals who are at work whilst under the influence of alcohol or drugs. They should also take appropriate action to protect the health and safety of individuals who are identified and those who may be affected.

4.0 Standards of Conduct for all Employees

4.1 Infringements of this policy will be dealt with under the disciplinary policy. The following non-exhaustive list gives examples of scenarios that could lead to disciplinary action up to and including dismissal, as such actions have the potential for interfering with safe and efficient job performance

- Employees are responsible for ensuring that they are not under the influence of alcohol or drugs when reporting for duty, carrying out work for the Company, or when on Company property. It is an infringement of this policy to consume alcohol or drugs during the working day (including lunch and other work breaks).
- An employee who possesses alcohol that they intend to consume while they are on Company property or carrying out work for National Grid
- An employee who is convicted of driving under the influence of alcohol or drugs while driving any vehicle on Company business

- The illegal use, sale, distribution or possession of controlled drugs or controlled substances while on Company property or when carrying out work for National Grid. National Grid will also refer such matters to the appropriate police authority.
- Drug or alcohol use off-the-job which adversely affects an employee's performance on the job, or which has the potential to jeopardise the health or safety of other employees, the public or National Grid's equipment or function,
- Employees who are convicted for an off-the job drug offence. In deciding what action will be taken, the incident will be evaluated in terms of the nature of the conviction, the employee's job assignment, the employee's record with the Company and other factors related to the impact of the employee's conviction on the Company.

4.2 Exceptions to the policy concerning alcohol consumption or possession may be made only upon the prior explicit approval of senior management (Band A and B Managers) for specifically identified circumstances.

4.2.1 As an exception to this policy, National Grid recognises the controlled use and possession of prescribed and over the counter medicines for personal use. If an employee is taking such drugs that may have an impact on their physical and/or mental ability they must report this, in confidence, to the Occupational Health or Medical Department (US) of the business where they work so that an assessment can be made as to whether the person is fit for their normal duties, and whether there is a need to modify the employee's job assignment while the medicine is being taken.

5.0 Workplace Drug and Alcohol Testing

5.1 This policy is intended to ensure that employees and contractors are not under the influence of alcohol, or drugs whilst at work, do not misuse drugs or alcohol such that it adversely affects health and safety at work, nor are they exposed to the consequences of misuse by others. To ensure compliance with this, National Grid will implement programmes for drug and alcohol testing as follows, subject to the Company's duties and obligations in the United States under the National Labor Relations Act:

- Specific Legal Requirements

Testing will take place as required by legislation in the Country of operation such as the FMCSA and PHMSA requirements in the United States or Transport legislation in the UK

- Pre- Employment

Pre-employment drug and alcohol testing will be a condition of employment. Employment will be contingent upon the successful completion of a post-offer pre-placement medical examination which will include drug and alcohol screening.

- Post Incident Testing

Where an incident occurs during work that results in a Lost Time Injury, is a Significant Incident or is a Significant Near Miss, National Grid reserves the right to test for drug and alcohol impairment as part of the incident investigation. Testing shall be carried out as soon as reasonably practicable after the incident occurs. In the United States, supervisors **must** contact Employee & Labor Relations (E&LR) immediately after the incident occurs to verify testing protocols. No testing may be initiated without E&LR approval.

- Reasonable Cause

In order to protect the health and safety of employees and others, National Grid reserves the right to carry out testing for drugs and alcohol if there is reasonable cause to believe as a result of observations of behavioural signs and symptoms that an employee is under the influence of drugs or alcohol (whether or not an incident has occurred).

Exception: Corporate Drug Testing Program Agreement, NY South Region only. Refer to Appendix 1

5.2 In all circumstances testing will be carried out in accordance with standard medical protocols and in accordance with applicable legal or regulatory requirements.

5.3 Any worker who tests positive for drugs or alcohol or who refuses to take a test as required by this policy, will be immediately suspended from work in which they are engaged, pending a full investigation.

6.0 Training

6.1 Supervisors will be trained in how to implement this policy. This will include training on how they can recognise through observation of the sign and symptoms, or other techniques, whether a person is under the influence of drugs or alcohol.

7.0 Support for Employees

7.1 National Grid will provide support for employees who need support and help with drugs or alcohol dependency via confidential Employee Assistance Programmes (EAPs) or Medical/Occupational Health support services. Employees who proactively seek treatment will be treated sympathetically and in a confidential manner. In certain cases this may require a transfer to other duties (e.g. where a person is working in a safety critical role) while the individual is receiving treatment. However the fact that an employee is seeking or undergoing treatment will not be a defence to a charge of misconduct if the employee attends work under the influence of drugs or alcohol.

7.2 In support of this policy each National Grid business will ensure that:

- They have sufficient medical and occupational health resources to deliver the support services identified in this policy
- They establish appropriate arrangements (with external suppliers if necessary) to deliver the workplace drug and alcohol testing requirements

8.0 Related Documents

- Group Policy Statement – Safety and Occupational Health
- A Safe Way of Working – Our Commitment to Safety and Occupational Health
- Health and Wellbeing – Our Commitment to the Health and Wellbeing of our Employees

8.1 Key Contacts

- Policy Owners: Mike Westcott, Global HR Director
Kathleen Geraghty, VP Employee & Labor Relations (US)
John Ong, UK Head of Employee Relations & Case Management (UK)
- Policy Lead: Andy Buxton, Health Standards Manager (UK)
Stephanie Shepard, Director, Integrated Health Mgmt (US)
- First Point of Contact: Mark Thompson, HR Case Manager (UK)
Tess Overdyk, Manager, Integrated Health Management

8.2 Document Control Process - Any proposed changes to this document will be reviewed by Kathleen Geraghty, VP Labor Relations (US) or T.B.D. (UK) with assistance of Integrated Health Management (US) and Case Management (UK) as required. The proposal will be evaluated for appropriateness and impact on the Global Policy. If agreement is reached, the proposal will be presented to Mike Westcott, Global HR Director for approval and implementation.

9.0 Monitoring & Compliance

9.1 Any changes to this Policy needed to ensure its effectiveness will be drawn to the attention of the Board's Committee on Risk and Responsibility and to the Board itself.

9.2 Each National Grid business will ensure that it has the necessary arrangements in place to implement the requirements of this policy and monitor and report compliance against this policy on an annual basis. Each Associate Company and Joint Venture will be encouraged to put in place similar arrangements to enable compliance to be reported on an annual basis.

9.3 The Group SHE Audit Programme will be used to determine the level of compliance with this policy statement.

10.0 Definitions

Under the Influence of Drugs - A person whose tests results for specified drugs exceeds the levels that indicate impairment established by the Substance Abuse and Mental Health Service Administration (SAMHSA).

Under the Influence of Alcohol – In the UK a person whose tests results indicate a blood alcohol concentration (BAC) in excess of 0.05% or 50mg/100ml (equivalent to a breath alcohol concentration (BrAC) of 22mcg/100ml) and in the US a BAC in excess of 0.02% or 20mg/100ml (equivalent to a BrAC of 9mcg/100ml)

Lost Time Injury - Any injury to a National Grid employee or contractor arising out of or in connection with work being carried out by or on behalf of National Grid leading to lost time beyond the day or shift of the incident.

Significant Incident - An occurrence that caused injury to a member of the public, or major damage to National Grid or non-National Grid assets, major power supply failure, major environmental damage, a major explosion/fire due to a gas leakage from the National Grid network, or other similar level event.

Significant Near Miss – An occurrence that that did not result in injury but is assessed as a high risk due to the potential severity and the likelihood of recurrence and including those that could have resulted in: fatality or major injuries to persons (including members of the public), major damage to National Grid or non-National Grid assets, major power supply failure, major environmental damage.

BAC - US typically refers to BAC as Breath Alcohol Content as a quantitative value received from an instrument referred to as an intoxilyzer or breathalyzer. UK refers to it as Blood Alcohol Concentration.

11.0 Timing

- Date of policy came into effect: 6th April 2009
- Date policy last updated: October 1, 2011
- Review date: October 1, 2012

12.0 Change History and Release Control

Team	<i>Shared Services, Employee & Labor Relations</i>
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Change/Review History

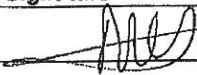
Ver.	Date Modified	Modified By	Brief Description of Changes
1	April 2009	CN	In line with the new Drugs and Alcohol Global Policy
2	June 2009	CN	Amendments to the Drug testing timescales
3	January 2010	MT	Change of first point contact
4	November 2011	KAG / KPM	Complete Review and Revision/Update
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6			
7			
8			
9			

Other Reference Documents

Document Name	Filename

13.0 Document Approval

The undersigned hereby approves and accepts the attached document on behalf of National Grid. Your signature affirms you agree with the purpose and scope of this document; the document has been appropriately reviewed; and you understand and accept responsibility for any assignments or functional implementations based on this document.

Ver.	Approved by:	Signature	Date
8	Mike Westcott, Global HR Director		

14.0 Appendix 1Appendix 1

Special Agreement Between Long Island Lighting Company and Local Unions 1049 & 1381 of the International Brotherhood of Electrical Workers, effective February 14, 1992 establishing a Corporate Drug Testing Program



Special Agmt - 1992
Drug and A...