



Drug & Alcohol Policy

Nelco Limited values the health and safety of all associates. We shall not use, be under the influence of, possess or distribute illegal drugs, controlled substances or alcohol while on company premises or when conducting company business. Performing work under the influence of drugs or alcohol imperils your health, safety and well-being and can put you and those around you at risk. It can also interfere with your ability to do your job safely and efficiently.

This policy applies to the employees of the Company, its sub-contractors, vendors, business associates, representatives and visitors while on Nelco's premises during work hours, or at any other location of the Customers for whom we perform work. The employee believed to be under the influence of alcohol or drugs will not be permitted to work until free of such influence. The employee is also required to meet the drug and alcohol testing requirements, if any of the Customer entities for which we carryout work.

This also applies to lawfully prescribed medication, if such use may impair our ability to perform our jobs or poses a direct threat to ourselves or others in the workplace. Any drug and/or alcohol related problem will be treated as "strictly confidential" and treatment and/or counselling is to be sought and undertaken and the immediate manager to be kept informed.

Anyone suspected of possessing alcohol, an illegal drug or a controlled substance during working hours is subject to inspection and search, with or without notice. The Company reserves the right to demand a drug or alcohol test of any employee based upon reasonable suspicion. Reasonable suspicion includes, but is not limited to, physical evidence of use, involvement in an accident, or a substantial drop off in work performance. Non-compliance of this policy and/or failure to take a requested test may lead to disciplinary action, including possible termination.

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Social events by Company:

Social events such as parties, get-together, gatherings, festivities (Events) can be held at the workplace or any other location. To ensure everyone remains safe:

- non-alcoholic drinks and food will be provided during Events at workplace;
- in case of events outside location, no prohibited drugs or controlled substances will be permitted, the participants of the Events shall behave responsibly;
- alternative public transport arrangements can be considered instead of self-driving in case of consumption of alcohol.

It is the sole responsibility of every employee to ensure their own health and safety at work and to avoid adversely affecting the safety and health of any other person.

This Policy shall be in force with immediate effect.

For NELCO Ltd.

A handwritten signature in blue ink, appearing to read "P. J. Nath".

P. J. Nath

Managing Director & CEO