

Procedure for Alcohol and Other Drugs

Purpose

Every Hellas Gold employee, contractor employee and visitor is entitled to a safe work environment. For this reason the distribution, possession, consumption, manufacture, preparation, presence or use of illicit drugs or alcohol on any Hellas Gold worksite is forbidden. Everyone must contribute towards a safe working environment.

Reasons for Testing

Testing for Alcohol and Other Drugs will continue:

- During all pre-employment, job reassignment, return to work, and periodic preventive physical examinations.
- Immediately following all incidents that caused or could have caused damage or injury.
- Immediately when "Reasonable Cause" is found to exist based on:
 - Irrational or unusual behavior
 - Reporting to work in an apparent unfit condition
 - Specific clear observations concerning the appearance, behavior, speech or alcohol odor
 - Repetitive delays for work commencement or inexcusable absence.

A checklist provided in Appendix C will assist in determining "Reasonable Cause". Random testing shall be conducted at all sites. The Head of Operations, Greece must approve all random testing plans and schedules before testing is conducted.

Testing Requirements

At a minimum, tests shall be conducted for:

- Alcohol
- Marijuana
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine

This list will be updated as required. Drug and alcohol sample collection and testing shall conform to nationally recognized standards, Hellas Gold Internal Work Regulations Articles 38, 40 and 48, as well as the Greek Mining Law Article 5-A.2(j).

Detection, screening and confirmation limits for drugs must be in accordance with nationally recognized standards. (Appendix A)

All tests performed at the Hellas Gold medical clinics and conducted by fully trained medical staff.

An employee with a positive test result, above detectable limits shall not be allowed to go to, or continue to, work. They shall be:

- Not permitted to work.
- Escorted to their homes and not allowed to drive.
- If the confirmation test is positive, initiation of the disciplinary procedure.
- The reason for the suspension shall be documented and placed in their personnel file.
- If the confirmation test is negative, the suspension shall be voided.

Employees who test positive for alcohol or other drugs shall not be allowed to return to work until a negative test is confirmed.

If an employee tests positive as the result of a prescription medication, the Hellas Gold Occupational Physician can certify the employee fit to work with specific use of the medication or determine that the employee is not to work while taking the medicine. The Hellas Gold Occupational Physician retains the right to request a second opinion.

Consequences for Violation of Procedure

Employees who test positive for alcohol or other drugs shall be subject to the Hellas Gold Disciplinary Policy. As well, additional unannounced testing may be required. Mandatory rehabilitation may also be required as deemed necessary by the Occupational Physician. This decision may be taken with the help of a specialist.

Any person who refuses to be tested for alcohol and other drugs shall be:

- If there is "Reasonable Cause" to suspect the person is impaired, they shall be escorted to their home and not allowed to drive.
- Employees refusing to be tested shall be immediately suspended without pay pending discussions between HR and their Department Manager to determine the appropriate discipline.
- The reason for the suspension shall be documented and placed in their personnel file.
- Employees of contractors refusing to be tested shall be banned from all HG sites.

Any person found to be distributing prescription, illegal, and or non-prescription drugs without authorization may be reported to the appropriate local authorities.

Confidentiality

At all times all information regarding alcohol and other drugs testing must remain strictly confidential. Only the medical staff, direct Supervisor, Department Manager, HR Manager, OHS Manager and Head of Operations - Greece are to have access to this information.

Employee Assistance Program

Hellas Gold will ensure that professional support is available for employees who request help in managing a drug and or alcohol problem. Contractors shall be encouraged to provide the same support for their employees.



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Hellas Gold Responsibilities outside the Workplace

Hellas Gold functions

Functions sponsored by Hellas Gold shall involve a responsible approach to serving alcohol. Functions that include the serving of alcohol are not allowed on Hellas Gold sites. If a function will be held at a location where alcohol will be available, it is the function arranger's responsibility to ensure risks are evaluated and controlled prior function approval. This shall include but not be limited to:

- Ensuring the prominent availability of alcohol-free and low alcohol drinks, reducing the availability of full strength beers, wines, and spirits.
- Providing appropriate food for consumption with drinks (i.e. non-salty protein based food).
- Instructing those serving drinks not to serve any individual who has been clearly affected by alcohol.
- Stopping service of alcohol at a reasonable time prior to the end of the function.
- Not allowing unopened bottles or cans of alcohol to be removed from the function site at the end of the function.
- Encouraging employees to organize a designated driver or alternative transport prior to the function.
- Providing transportation from a function to home where appropriate.

Education

Education is a key part in the successful implementation of a Drug and Alcohol program. All employees and contractors shall receive the following at induction or orientation:

- Behavioral expectations of employees and contractors employees.
- The drug and alcohol policy and procedures that are in place on the site.
- The type of assistance with managing drug and alcohol issues that employees can access.

Attached Documents:

Appendix A

Appendix B

Appendix C

Athens, July 1st 2014

For Hellas Gold S.A.



Edouardo Moura
Chairman of the Board



M. Theodorakopoulos
Deputy Managing Director



J. Britt Reid
Head of Operations

Appendix A
Urine Test Limits For Confirmation of Positive Test Results

Alcohol	100 mg/dl
Barbiturates	200 ng/ml
Propoxyphene	300 ng/ml
Methaqualone	300 ng/ml
Amphetamines	1,000 ng/ml
PCP	25 ng/ml
Methadone	300 ng/ml
Benzodiazepine	200 ng/ml
Opiates	300 ng/ml
Cocaine	300 ng/ml
Cannabis	50 ng/ml

Any confirmation test that exceeds the cut-off limit as stated above will be considered a "positive" test for that substance.

Appendix B
Guidelines for Alcohol
Current Standard

% concentration (mg/l)	Actions
Between 0.00 and 0.25	Continue working if no impairment. Supervisor will coach the employee and document this and the % alcohol in the personnel file. In case of relapse, the supervisor will issue a formal coaching letter and place it in the HR file. Further relapse will result in starting the formal disciplinary procedure.
From 0.25 and above	Stop work immediately. Start the disciplinary procedure. Document the disciplinary action and % alcohol in the personnel file.
Refusing to take test	Refusal of the employee to take the test will be noted in employee's personal file in the HR Department.

Appendix C

Employee: _____ Date ____/____/____ Time _____

Supervisor: _____ Department: _____

Foreman: _____

NOTE: Ensure that any possible medical condition is addressed at the same time as testing for Drug & Alcohol.

I. Are concerns about the individual's behavior based on (check those that apply)?

____ Reasonable suspicion

____ Post-accident based on reasonable suspicion

II. Employee Behavior: (If- 2 or more "Yes" responses...administer test)

1. Does individual seem dazed, confused or disoriented?

Yes ____ No ____ Describe _____

2. Have you observed the individual to have difficulty with movement, balance or coordination (loss of balance, stumbling or staggering, jerky movement, lean on objects for balance)?

Yes ____ No ____ Describe _____

3. Is there a concern about the individual's speech, content of speech, pace of speech or slurring of words?

Yes ____ No ____ Describe _____

4. Is there any concern about a change in physical appearance (e.g. - eyes red, glossy, or unkempt)?

Yes ____ No ____ Describe _____

5. Have there been concerns/reports about this individual in regards to any unusual behavior today?

Yes ____ No ____ Describe _____

6. Has this individual made a "judgment error" and/or deviated from operating rules and procedures?

Yes ____ No ____ Describe _____

III. Evidence of possible alcohol/drug use at work: (If- "Yes" to any...administer test)

1. Is there odor of alcohol on individual's breath.

Yes ____ No ____

2. Have you observed or discovered the individual to have any possession of alcohol, possession of other drugs, or paraphernalia on the job?

Yes ____ No ____

3. Have you or anyone else witnessed this individual's consumption of alcohol or other drug today?

Yes ____ No ____

IV. Test: Was the test result? (Check one) Positive ____ Negative ____ *Not Given ____

If the result is positive- The Hellas Gold Occupational Physician, Department, HR and OHS Managers must be notified.

If the result is negative, this document will not be copied or filed, but will be given to the individual at their own discretion. *If test was not given describe why :

Supervisor: _____

Nurse: _____

Signature: _____

Signature: _____

(Name): _____

(Name): _____

