

SMOKING POLICY

Policy brief & purpose

Our employee smoking policy is designed to outline the company's rules regarding smoking in the workplace. The objectives of this policy are;

- To reduce the risk of fires caused by carelessly discarded cigarettes within our facilities and mining operations.
- To ensure that employees and visitors who do not smoke are provided with a healthy, smoke-free workplace while preserving the opportunity for those who do smoke to do so, during scheduled breaks, in appropriate designated locations.

The law may place restrictions on indoor smoking and the company always adhere to all legal requirements. The present policy is only meant to express the value that we place on a healthy and safe workplace.

Scope

This policy applies to all employees of our company as well as to visitors, contractors and temporary staff while they are within the company's operations, offices and vehicles.

Policy elements

We believe that the right to clean air and the health of non-smokers supersedes the right of others to smoke.

The objectives of the policy, however are not only designed to protect non-smokers from the hazard of second-hand smoking but include the following additional aspects:

- To safeguard the legality of the company's premises by adhering to relevant legislation
- To limit the probability of fires started by improperly discarded cigarettes, cigars etc.
- To avoid falsely setting off alarms and smoke detectors
- To preserve the image of a clean workplace without unpleasant smells or smoking-related trash

For these reasons, smoking is strictly prohibited indoors at company facilities unless there is a designated area especially for this purpose. This non-smoking policy covers all premises, even those which do not constitute regular working areas such as bathrooms, hallways, staircases etc. It also includes company property that is leased or owned by the company for business purposes.

The prohibition is in effect before, after and during working hours. For example, if an employee stays late at work, he is still obliged to refrain from smoking inside the premises.

Smoking may be permitted during normal breaks and only at the following places:

- Designated smoking areas/rooms
- Balconies and open-air verandas
- Any outer areas including gardens, yards and sidewalks outside of the company's building

Even when employees are smoking at the above-mentioned areas, they still have the following obligations:

- To always extinguish their cigarettes and other smoking material (e.g. matches) and discard them only in appropriate containers

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- To avoid smoking when they perceive that air vents in smoking areas are not working properly
- To refrain from smoking near flammable objects or materials
- To refrain from smoking when they have scheduled meetings with clients or vendors

At any time, smokers are kindly advised to respect their fellow workers by not smoking too near them when outdoors and nor exhaling smoke directly at them.

Employees will be informed of the requirements of this policy through official bulletin boards, company newsletters and appropriate signage.

Employees who welcome visitors or meet with clients on company premises are obliged to inform them of our non-smoking policy and direct them to the designated smoking areas.

Drivers of company vehicles are responsible for informing passengers that they are forbidden to smoke in the vehicle and enforcing this rule.

Any employees who persistently disregard the guidelines of this smoking policy will be deemed to be in breach of the company's work regulations and subject to the disciplinary provisions detailed within these.

This policy has the full support of top management and is implemented, maintained and communicated to all employees, suppliers and subcontractors and is made available to the public.

Dimitris Dimitriadis
Vice President & Managing Director
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