

 SD Guthrie	SD Guthrie Berhad Group Prohibition of Smoking, Drug, Alcohol and Substance Abuse Policy	2025
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SD Guthrie Berhad

Group Sustainability – Health, Safety & Environment

Group Prohibition of Smoking, Drug, Alcohol and Substance Abuse Policy

SDG/GS-HSE/POLICY/2026/06/007

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1. DEFINITIONS

The definitions of the key terms used in this Policy are as follows:

TERMS	DESCRIPTIONS
Alcohol	Includes any liquid containing ethanol in any form that may impair judgment, behaviour, or the ability to work safely. For example, beer, whiskey, wine, vodka, spirits etc.
Building	Refers to inside the building of SD Guthrie Group, and includes the five-foot way within 3 metres from the distance of building line and the area covered by any additional permanent roof that is connected to the main building of Guthrie Group
Breathalyzer	Refers to alcohol breath test
Controlled Substance(s)	Refers to drugs or chemicals with the capacity to create addiction or habituation.
Covered Person(s)	Refers to all employees, directors, third party contractors, sub-contractors, consultants, agents, representatives, other service providers, volunteers of Guthrie Group and guests on the premises of Guthrie Group
Drugs	Refers non-medical use of drugs or drugs used not under the supervision of or prescribed by a medical doctor or dentist or pharmacist
Employee(s)	Refers to any person who has entered into a contract of service with Guthrie Group
Other intoxicants	Refers to something that causes a person to become excited or confused and less able to control what they say or do
Illegal Drugs	Includes cannabis (ganja, hashish, marijuana), amphetamines, ecstasy (including MDMA, MDM, and Adam), cocaine, opiates (including opium, heroin, morphine, codeine, pethidine, and methadone), depressants (including sedative hypnotic types of barbiturates and tranquilizers), stimulants (such as amphetamine and cocaine), hallucinogens (including Lysergic Acid Diethylamide (LSD), mescaline, and psilocybin), methamphetamine, ketamine, and other controlled substances
Test(s)/testing	Refers to the necessary tests that the Covered Persons, including all employees of Guthrie Group, shall be subject to, at any time, as may

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TERMS	DESCRIPTIONS
	be required by Guthrie Group to determine the existence of drugs, illegal drugs, controlled substances, alcohol and/or other intoxicant in the blood and/or urine
Random testing	Refers to unannounced immediate testing for drugs, illegal drugs, controlled substances, alcohol and/or other intoxicants or unannounced breathalyzer that is performed by Guthrie Group, on random selection of the Covered Persons, including all employees of Guthrie Group.
Guthrie Group	Refers to companies within Guthrie, including its subsidiaries, associated, related and affiliated companies, whether present or formed, incorporated or acquired in the future
Substance Abuse	Refers to the use of illegal drugs or the use of prescription or over-the-counter drugs or alcohol for purposes other than those for which they are meant to be used, or in excessive amounts
Smoking	Refers to inhaling and expelling the smoke or vapour, of any tobacco product or substitute tobacco product, and includes the holding of or control over any tobacco product or substitute tobacco product which is ignited, heated or vaporized or used in any other methods. Examples of other smoking products are vaping and e-cigarettes

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2. POLICY STATEMENT

- 2.1. Safety and health are a collective responsibility. Every person, including employees, directors, third party contractors, sub-contractors, consultants, agents, representatives, other service providers, volunteers and guests/visitors on the premises and/or building of Guthrie Group are responsible to take reasonable care of their own safety and health and not endanger the safety and health of others.
- 2.2. Guthrie Group is fully committed to provide, as far as is practicable, a safe and healthy working environment that is free of the effects of smoking, drugs, alcohol, other intoxicants and substance abuse or dependency.
- 2.3. In line with this commitment, this Policy is established to ensure that employees, directors, third party contractors, sub-contractors, consultants, agents, representatives, and other service providers, performing work or services on behalf of or for Guthrie Group as well as volunteers and guests on the premises and/or Building of Guthrie Group, have a clear understanding of the rules regarding safety, health and an environment free of the effects of smoking, drugs, illegal drugs, alcohol, other intoxicants and substance abuse or dependency.

3. PURPOSE

Guthrie Group adopts zero tolerance to smoking, drugs, alcohol, other intoxicants and substance abuse or dependency in any workplace or work-related activities of Guthrie Group. The purpose of this Policy is to improve, foster and maintain a safe, healthy and productive working environment by strictly prohibiting, detecting and taking corrective action against smoking, drugs, illegal drugs, alcohol, other intoxicants and substance abuse or dependency.

4. SCOPE OF APPLICATION

- 4.1. This Policy is applicable to the Covered Person performing work or services on behalf of or for Guthrie Group as well as to volunteers and guests on the premises of Guthrie Group.
- 4.2. Each Covered Person is expected to read and understand this Policy and, in particular, to ensure strict compliance with it in the relevant parts. Any doubts or questions should be addressed to Group HSE, via gs.hse@sdguthrie.com
- 4.3. This Policy neither constitutes nor should be construed to constitute, a contract of service to the Covered Persons who have not entered into a contract of service with Guthrie Group or a guarantee of continued employment to employees employed under a fixed term contract of service of Guthrie Group.

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- 4.4. Guthrie Group reserves the right to modify, revise, cancel or waive the provisions of this Policy, from time to time, at its' sole and absolute discretion.
- 4.5. This Policy is prepared in English and Bahasa Malaysia. In the event that there is any conflict and/or inconsistencies between the English and Bahasa Malaysia versions of this Policy, the English version shall prevail.

5. PROHIBITED BEHAVIOUR

5.1. Smoking

- 5.1.1. All areas of Buildings occupied by Guthrie Group.
- 5.1.2. All Guthrie Group-sponsored offsite conferences and meetings.
- 5.1.3. All vehicles owned or leased by Guthrie Group.

5.2. Drugs, Illegal Drugs and Controlled Substances

- 5.2.1. Covered Persons are prohibited from reporting to work or being on the premises of Guthrie Group, and/or at events or while conducting business of Guthrie Group, whether within or outside the premises of Guthrie Group under the influence of drugs, illegal drugs or controlled substances and/or to use, sell, dispense, distribute, possess, manufacture drugs or illegal drugs or controlled substances.
- 5.2.2. No person shall encourage, persuade or coerce another to engage in the use of drugs, illegal drugs or controlled substances or participate in the sale or transfer of such drugs or substances in the premises of Guthrie Group.

5.3. Prescription and Over-the-Counter Drugs

- 5.3.1. Some medications prescribed by medical doctors, dentists, pharmacists or available over-the-counter (i.e. without prescription) may affect the ability to work safely.
- 5.3.2. Prescription and over-the-counter drugs are not prohibited when taken in standard dosages and according to the prescription of a medical doctor or dentist and/or pharmacist.
- 5.3.3. The illegal or unauthorised use of prescription drugs is prohibited. It is a breach of this Policy to intentionally misuse and/or abuse prescription medications.
- 5.3.4. Any employee taking prescribed or over-the-counter medications is responsible for consulting the prescribing medical doctor or dentist and/or pharmacist to ascertain whether the medication may interfere with the safe performance of his/her job. If the use of such medication could compromise the safety of the employee, fellow employees, other Covered Persons or the public, it is the employee's responsibility

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to use appropriate employment procedures (e.g. to submit a sick leave certificate, request change of duty, notify supervisor) to avoid unsafe workplace practices.

5.4. Alcohol or other Intoxicants

- 5.4.1. Covered Persons are strictly prohibited from reporting to work under the influence of alcohol or other intoxicants; consuming alcohol or other intoxicants on the premises of Guthrie Group, and while conducting business of Guthrie Group, whether within or outside the premises of Guthrie Group.
- 5.4.2. Non-Muslim employees may consume alcoholic beverages, at any workplace-based social events or social events related and/or connected to their employment with Guthrie Group or at appropriate functions not related and/or connected to their employment with Guthrie Group, outside their work hours.
- 5.4.3. However, if non-Muslim employees choose to consume alcohol, at any workplace-based social events or social events related and/or connected to their employment with Guthrie Group and at appropriate functions not related and/or connected to their employment with Guthrie Group, outside their work hours:
 - such employees must do so responsibly, lawfully as well as conduct themselves properly, and professionally, at all times;
 - such employees who are subsequently, present for work on the next day, must do so, and remain, while at work, fit and capable of performing their work duties. An employee who consumes alcohol outside work hours is deemed to be in breach of this Policy if the breathalyzer performed the next day, during work hours, is positive for alcohol; and
 - such employees must ensure that their choice does not, in any manner, impair their ability to subsequently work safely at Guthrie Group and/or cause disrepute to Guthrie Group.

6. TESTING FOR DRUGS, ILLEGAL DRUGS, CONTROLLED SUBSTANCES, ALCOHOL AND/OR OTHER INTOXICANTS

- 6.1. Testing for drugs, illegal drugs, controlled substances, alcohol, and/or other intoxicants, and breathalyzers, including random testing, is a part of continued employment as well as to ensure safety and health at the workplace, and to ensure that productivity levels are met.
- 6.2. Guthrie Group reserves the right to test the Covered Persons, for drugs, illegal drugs, controlled substances, alcohol, and/or other intoxicants, and breathalyzers, including random testing.

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- 6.3. Covered Persons shall cooperate and consent to undergo testing, including random testing, and shall authorise the disclosure of such test(s) to Guthrie Group, for appropriate action (if any), failing which such persons shall be deemed to be in breach of this Policy.
- 6.4. Guthrie Group shall collect, process and store the results of such testing for purposes of compliance with this Policy, the legal obligations of Guthrie Group applicable in the respective jurisdictions where it operates including under Section 15 of the Occupational Safety Health Act 1994 and/or for risk management purposes.
- 6.5. In the event of a positive test result from such testing, including random testing, the Covered Persons shall be deemed to be in breach of this Policy.

7. CONSEQUENCES OF BREACH OF POLICY

- 7.1. Any employee who does not strictly comply with this Policy is deemed to have acted outside the scope of his or her employment or authority and will be subject to disciplinary action, up to and including dismissal from service and/or corrective action.
- 7.2. Directors, third party contractors, sub-contractors, consultants, agents, representatives, and other service providers of Guthrie Group will be subject to penalties that may include loss of contract for breach of this Policy and/or other adverse consequences.
- 7.3. Guests and visitors will be subject to being barred from activities and/or premises of Guthrie Group, and volunteers will be subject to being removed from their positions and/or or further participation with Guthrie Group, for breach of this Policy.
- 7.4. Smoking, the use or consumption of any illegal drugs, alcohol, other intoxicants and substance abuse or dependency will also be reported to the appropriate law enforcement authorities and/or agencies and may result in criminal prosecution.