

Subject: Alcohol testing system**Application areas:**Perimeter: *Russia*

Support and management function: -

Service function: -

Business line: -

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APPROVED BY
CEO OF PJSC ENEL RUSSIA



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1. DOCUMENT AIM AND APPLICATION AREA

This Operational Instruction establishes the procedure for alcohol testing of the Company's employees, contractors' personnel, third parties when entering / leaving the power plants of PJSC Enel Russia with stationary and portable automatic alcohol testers.

This document supersedes Operational Instruction No.0232-OI-HSEQ "Alcohol Testing System" version No.1 dated 04.09.2015/

This Operating Instruction shall be applicable to all Company's employees, contractors performing works/providing services in the power plants of PJSC Enel Russia, legal entities/individuals leasing power plant facilities of PJSC Enel Russia, and the persons visiting the power plants of PJSC Enel Russia.

2. DOCUMENT VERSION MANAGEMENT

Version	Date	Description of the main changes
1	05.09.2018	Issue of Operating Instruction No.1534
2		

3. UNIT IN CHARGE OF THE DOCUMENT

Responsible for drawing up the document:

- PJSC Enel Russia: Health and Safety Group

Responsible for the document final authorization:

- Human Resources and Organization

4. REFERENCES

- Articles of Association of PJSC Enel Russia;
- Code of Ethics of PJSC Enel Russia;
- Zero Tolerance to Corruption Plan Regulation of PJSC Enel Russia;
- Global Compliance Program within Corporate Criminal Liability (Annex No.2 to Minutes of the Board of Directors Meeting of PJSC Enel Russia No.10/16 dated 23.11.2016);
- Labor Code of the Russian Federation;
- Internal Labor Regulations of Power Plants;
- PJSC Enel Russia Policy No.0303-PL-HRO dated 07.11.2017 "On Zero Tolerance to Consumption of Alcohol, Drugs or Other Intoxicants and Limitations of Smoking at Workplace";
- PJSC Enel Russia Procedure No. 539 "Access and On-Site Regimes" dated 25.03.2015;

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- PJSC Enel Russia Procedure No. 522 "Interaction with Contractors within the framework of EHS MS" dated 19.04.2018.

5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY

The process area: Health, Safety, Environment and Quality

Macro process: Health and Safety Management

6. DEFINITIONS AND ACRONYMS

Acronyms and key words	Description
Alcohol	Liquid containing alcohols.
Alcohol testing	Employee's actions in accordance with the device (alcohol tester) operation instruction at the entrance in/exit from the power plant.
Breath ethanol analyzer in exhaled air ("alcohol tester")	A device designed to measure ethanol vapor concentration in exhaled air.
Incident	A situation during preliminary control of alcohol intoxication state when Alcohol signal on the alcohol tester is activated
Drug	Substances of vegetable or synthetic origin, medical products containing narcotic agents that have specific (stimulating, excitatory, suppressive, psychedelic) effect on the central nervous system of the human
Drug intoxication	A condition that occurs after taking drugs (syndrome). The drug intoxication syndrome consists of mental and somatic symptoms, varying in time, different at the beginning, peak and on the decline of intoxication. There are also subjective symptoms of drug intoxication felt by the intoxicated, and objective ones which can be registered from outside.
Guard Superintendent	The plant security team official, under whose authority is the guard team, providing security services to the plant under the contract concluded with PJSC Enel Russia
Immediate Supervisor	Head of organization unit to whom an employee or a shop shift supervisor (for operational personnel) administratively report, for contractors - representative of the contractor
Company	PJSC Enel Russia
Contract Supervisor	An employee of Company's organization unit responsible for supervision and control over the work/service Contract (Agreement) performance
PP Security agency	An organization holding a license for rendering security services with which the Company has entered into the relevant contract to provide security services in the power plant

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Security Group	PJSC Enel Russia Security Group; Security Group or Security of the power plant
Contracting Company (Contractor)	A legal entity or an individual performing works / rendering services in the power plant on the basis of the contract (agreement) concluded with PJSC Enel Russia
Employee	An individual that has entered into employment relationship with PJSC Enel Russia / Contractor
Employer	A legal entity or an individual (company) that has into employment relationship with the employee
Organization Unit (Unit)	Directorate, Department, Group, Service, Shop, Area, Laboratory, Bureau, Warehouse of the power plant
Subcontracting Company (Subcontractor)	A company performing works / rendering services in the power plant on the basis of the contract concluded with the Contractor
EHS IMS	Environmental, Health & Safety Integrated Management System
CP	Check point
HRM	Human Resources Manager
PPSS	Power Plant Shift Supervisor
OI	Operating Instruction
OHG	Occupational Health Group
HS Group	Health and Safety Group
SEC	Security
PP	PJSC Enel Russia Power Plant
RGRES	Reftinskaya GRES Power Plant of PJSC Enel Russia
ACMS	Access Control and Management System

7. PROCESS DESCRIPTION

7.1 Basic Principles

The Company's employees shall bear disciplinary responsibility for violating the Policy "On Zero Tolerance to Alcohol, Drugs and Other Toxic Substances, Smoking Restrictions at Working Place" ("the Policy") in accordance with the legislation of the Russian Federation and local regulatory rules of the Company.

The Heads of Organization Units/ Contract Supervisors shall take measures to prevent employees of PJSC Enel Russia/Contractors from being in a state of alcohol intoxication in the power plant by making this employee (employees) leave the power plant.

Whenever the Policy is violated, the relevant head shall initiate the official investigation which results may imply disciplinary penalties on PJSC Enel Russia employee-violator. The acts of violation, reasons and consequences identified by the investigation, as well as the actions aimed to prevent from such violations shall be thereupon communicated to the employees within H&S framework.

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Furthermore, the Company's employees shall bear disciplinary responsibility for abusive actions towards the employees of the Security Agency. Even if the fact of alcohol intoxication is not confirmed by medical examination, the Employee shall not be relieved from disciplinary measures for aggressive behavior and abusive actions towards the employees of the Security Agency.

Application of disciplinary penalties to PJSC Enel Russia employees being in employment relationships with PJSC Enel Russia, shall comply with the labor legislation of the Russian Federation.

The Contractors shall bear responsibility for violating the Policy in accordance with the terms of the relevant civil law contract for performance of works/provision of services.

When performing their work the employees of the Security Agency shall follow the procedure "Access and On-Site Regimes" and bear responsibility for violating the requirements of these documents according to the contract concluded between PJSC Enel Russia and the Security Agency.

7.2 Procedure for Alcohol Testing of Employees upon Arrival at the Power Plant

A. Employee Identification in ACMS

Before the alcohol testing procedure, the Employee shall put his/her pass on the ACMS turnstile reader for identification.

B. Alcohol Testing Procedure

The Employee shall undergo alcohol testing in accordance with the procedure specified in Annex 1 to the present Operating Instruction.

The fact that the Employee has had the substances causing intoxication is determined by the presence of absolute ethyl alcohol in the concentration exceeding 0.16 milligrams per liter of exhaled air.

In case during alcohol testing of the employee, as stipulated in this clause of the Operating Instruction the level of alcohol vapors in exhaled air, as determined by the breathalyzer, exceeds the established limit (over 0,16 milligrams per one liter of the exhaled air), ACMS blocks the employee admission.

C. Incident Communication

Upon occurrence of such Incident, The Guard Superintendent inform PPSS about the incident.

PPSS shall prepare the e-mail about the Incident and send it to:

- PP Manager,
- SEC,
- HS Group (RGRES OHG),
- HRM.

Informing e-mail about the Incident shall contain the following information:

- Name, position, company of the employee;
- place of occurrence;
- breathalyzer report;
- Name of the Contractor's representative, to whom the information was sent (in case the Incident referred to the Contractor's employee).

SEC shall prepare a monthly report on all the cases of alcohol testing system actuation and send it to:

- PP Manager,
- SEC,
- HS Group (RGRES OHG),

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- HRM.

D. Drawing up the Report and Informing the Parties Concerned

PPSS shall immediately inform the Immediate Supervisor of the employee, in respect of whom the "Alcohol" breathalyzer signal had triggered, about the Incident.

The Immediate Supervisor of the employee shall:

- Immediately arrive at CP,
- Offer the Employee to go to the medical establishment for medical examination for the state of intoxication, on a voluntary basis.

In case of the Employee's refusal to go to the medical establishment for medical examination for the state of intoxication, on a voluntary basis:

- Request a letter of explanation of the Employee (the order of request of the Employee's written explanations and the order of documentation of the Employee's refusal to provide a written explanation is regulated by the RF Legislation),
- Prepare the Report, conforming to the specimen of Annex 3 to the present Operation Instruction, and Internal Memorandum, conforming to the specimen of Annex 4 to the present Operation Instruction,
- Inform PP Manager, Security, HRM, HS Group (RGRES HS) about the Incident.

E. Delivery of the Employee to the Medical Establishment

If the Employee agrees to undergo medical examination for the state of intoxication, the Immediate Supervisor (or the person appointed by him/her) shall within one hour deliver the Employee to the medical establishment for medical examination.

F. Medical Examination Procedure

If alcohol or drug intoxication is confirmed by the medical establishment, the Immediate Supervisor (or the person appointed by him/her) shall request a letter of explanation in writing from the employee (the order of request of the Employee's written explanations and the order of documentation of the Employee's refusal to provide a written explanation is regulated by the RF Legislation).

Refusal of the Employee to submit the letter of explanation in writing, in terms stipulated by the RF Legislation, shall be reported by the immediate supervisor in the Internal Memorandum, conforming to the specimen of Annex 4).

G. Document Preparation and Provision

In case of incident with the Company's employee being in an employment relationship with the Company:

The Immediate Supervisor (or the person appointed by him/her) shall submit to Security guard, HS, PJSC Enel Russia Power plant Manager the copies of the following documents:

- Report on Detecting Excess Alcohol Fumes in Exhaled Air during the Alcohol Testing/Report on Refusal to Undergo the Alcohol Testing;
- Medical Examination Report (if available);
- Internal Memorandum (if the incident happened with the Company's employee), -

To SEC, HS Group, the Power Plant Manager for further consideration.

The originals of these documents shall be handed over to the HR Manager for subsequent submission to the HR Administration.

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On the day when documents on the Incident are received, the HR Administrator shall:

- Prepare the Suspension Order for the Employee in accordance with Article 76 of the Labor Code of the Russian Federation;
- Hand over the Order to be signed by the relevant HR Manager in PP or other person, authorized for signing this document;
- After the Order has been signed by the HR Manager in PP (or other authorized person), register the Order and send its copies to the Immediate Supervisor and to the Payroll Group.

If the results of the medical examination are negative (no intoxication detected), the Immediate Supervisor shall:

- Accompany the Employee to his/her working place for performance of his/her job duties;
- Submit to HS Group (RGRES OHG) a copy of the Medical Examination Report.

In this case the time spent by the Employee on medical examination shall be deemed working time.

In case of incident with the Contractor's employee:

If the Incident happened with the Contractor's employee, the Contract Supervisor shall follow the terms of the Work/Service Contract concluded with the Contractor, as well as the Procedure on Interaction with Suppliers and Contractors in Health, Safety, Environment and Quality No. 522 dated 19.04.2018 and Policy on Contract Work No.0043-PL-LCA dated 24.09.2014 (to the extent consistent with the terms of the Work/Service Contract concluded with the Contractor).

The Contract Supervisor shall inform HS Group (RGRES OHG), SEC, the Production Plant Manager about the results of the actions taken for further investigation of the Incident.

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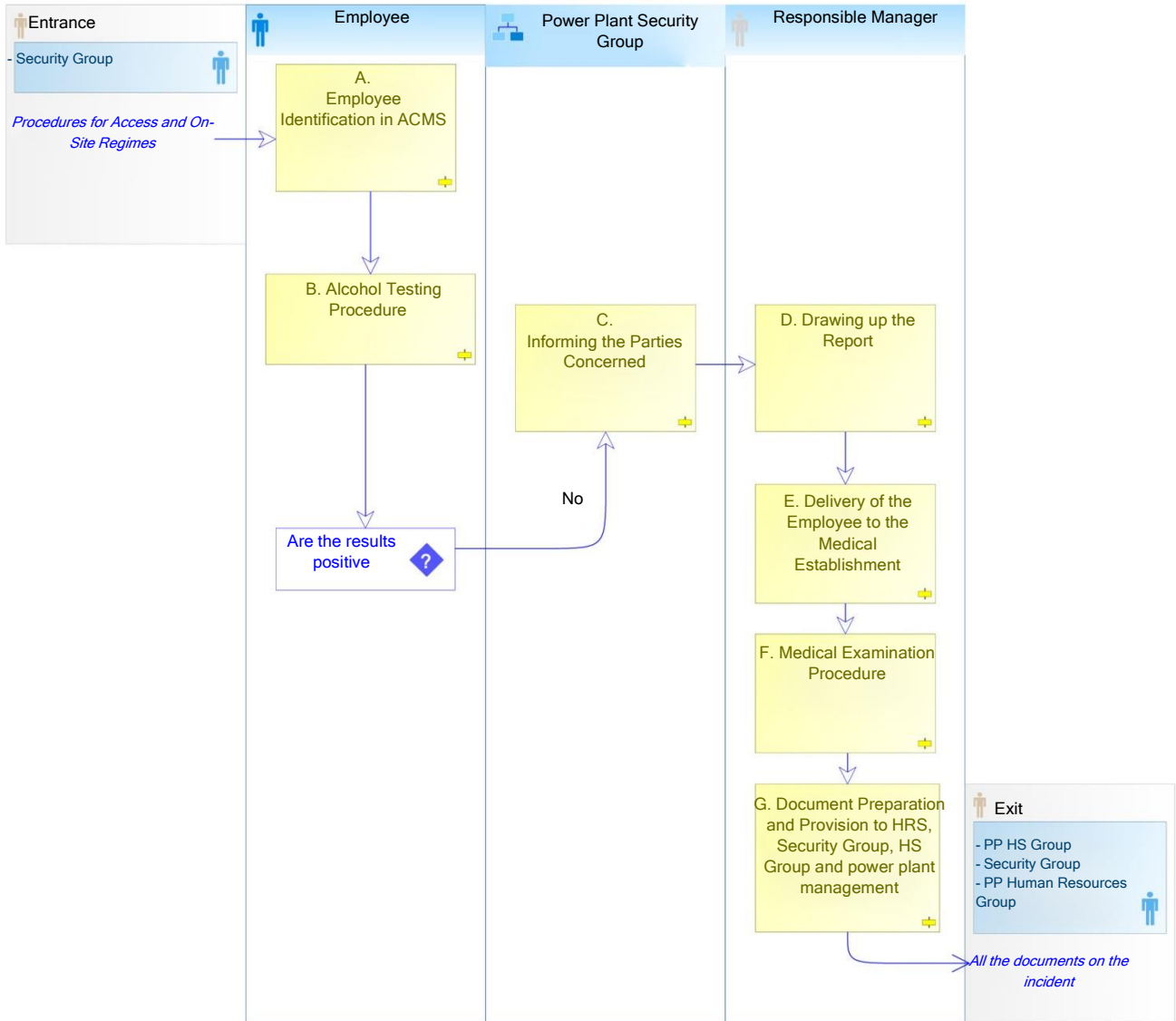
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7.3 Procedure for Alcohol Testing when Leaving the Power Plant

When leaving the power plant, the employee shall take the alcohol testing procedure in accordance with the process described in clause 7.2 hereof.

The production plant manager shall make the decision to limit alcohol testing for employees of PJSC Enel Russia upon leaving PP. The production plant manager shall inform SEC about the decision made.

In addition to 7.2 process hereof, in case of the Incident the employees of the Security Agency shall take away Employee's pass. The Guard Superintendent shall report to PPSS about the Incident. PPSS shall report to the direct supervisor of the employee, in respect of whom the "Alcohol" breathalyzer signal had triggered. The direct supervisor shall ensure execution of clauses D-G of 7.2 process hereof. The further actions on admission of the employee to PP shall be carried out according to PJSC Enel Russia Procedure "Access and On-Site Regimes".

7.4 Procedure for Alcohol Testing of Certain Categories of Citizens

A. Making Decision on Undergoing Alcohol Testing

The Production Plant Manager shall decide whether participants of delegations, visitors, excursions etc. should take alcohol testing. The Production Plant Manager shall inform SEC about the decision taken.

B. Passing through CP without Undergoing Alcohol Testing

SEC shall inform the Guard Superintendent about the decision taken by PP Manager in relation to alcohol testing procedure undergone by persons, indicated in p. 7.4(A) thereof.

The representatives of governmental control and supervision bodies shall undergo ACMS without undergoing the alcohol testing procedure and shall stay at PP accompanied by Company's employee.

C. Passing through CP with Undergoing Alcohol Testing

The persons, not enlisted in p. 7.4(A) thereof (visitors) shall undergo alcohol testing procedure according to the algorithm specified in Annex 1 to the present Operating instruction. If alcohol fumes detected in exhaled air exceed the allowable values, established by the present Operating instruction, the employee of Security Agency (or the Guard Superintendent) shall inform PPSS about the incident by phone. Visitor's pass shall be taken away; the visitor shall not be admitted to the corporate territory.

D. Informing the Third Party about the Incident

In case the visitor has arrived to the PP as part of execution of the contractual obligations, the responsible executive person for the civil law contract, concluded with the third party shall send an official letter with the incident description to the company which has sent its employee to the Power Plant.

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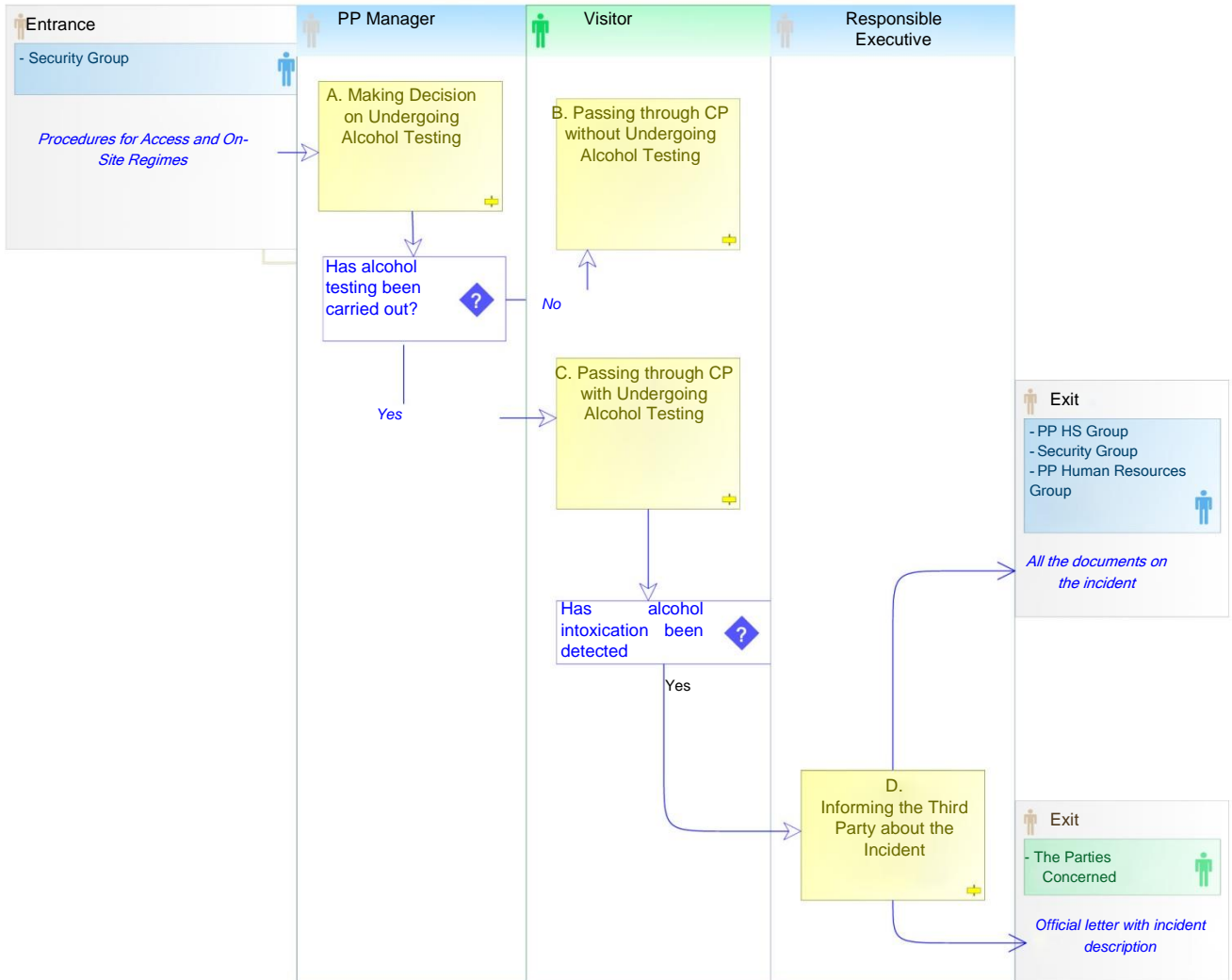
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7.5 Procedure in Case of Refusal to Undergo Alcohol Testing

If PJSC Enel Russia Employee refuses to undergo alcohol testing, the Guard Superintendent shall inform PPSS about the Incident. PPSS shall transmit data in the operational message to the Immediate Supervisor of the Employee and to HS Group by mail.

The Immediate Supervisor shall draw up the Report on Refusal to Undergo the Alcohol Testing (conforming to the specimen of Annex 3 to the present Operating Instruction) and transmit data to SEC and HS Group (RGRES OHG).

If the Incident happens with the employee being in an employment relationship with the Company, the Immediate Supervisor shall follow algorithm D of 7.2 process hereof.

If the Incident happens with the employee of the Contractor, HS Group shall hand over the Report on Refusal to Undergo the Alcohol Testing to the Contract Supervisor (CS). CS shall perform the procedures according to the terms of the Contract concluded with the Contractor and shall inform HS Group (RGRES OHG), SEC, the Power Plant Manager about the results of the actions taken.

7.6 Procedure in Case of Increased Time Needed for Delivery of the Employee to the Medical Establishment

In case of increased time needed for delivery of the Employee to the medical establishment for medical examination (the time needed for delivery of the Employee to the medical establishment is specified in sub-clause (E) of 7.2 procedure hereof), the Manager or acting Manager of PJSC Enel Russia Power Plant shall make the decision on the subsequent suspension of the Contractor's Employee for performance of his/her job duties, with respect to the Company's Employee –the decision shall be made by the head of the unit organizing the medical examination.

7.7 Procedure of Alcohol Testing when the employee worked on a day off or a holiday

In case the Employee worked on a day off or a holiday, the alcohol testing procedure is carried out as stipulated in p. 7.2 and p. 7.3 hereof. G, if the result of the medical examination for the state of the alcohol intoxication is positive, the employee is suspended from service, for which the Shift Supervisor shall make a relevant note in the operational log. Preparation and presentation of the documents in relation to the Incident, as per p. G process 7.2, takes place the first working day thereafter.

Decision on restriction of the alcohol testing procedure for the PJSC Enel Russia staff in case of work on days off and holidays is to be taken by the PP Manager. On his decision the PP Manager shall inform the SEC.

7.8 Procedure of Alcohol Testing with Portable Alcohol Tester

The operating mode of the portable alcohol tester is within the range between -5 - +50 C° that implies some restrictions on its functional use.

Testing with the portable alcohol tester shall be performed on random basis in case of inspections, security patrols and at CP with no stationary alcohol testers.

The employee shall undergo alcohol testing in accordance with the algorithm specified in Annex 2 to the present Operating Instruction.

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If alcohol fumes are detected in exhaled air, the controller shall draw up the Report on Detecting Excess Alcohol Fumes in Exhaled Air during the Alcohol Testing (Annex 3 to the present Operating Instruction) and inform the Immediate Supervisor of the Employee about the Incident, and also the Contract Supervisor if the Incident happens to the Contractor's Employee.

If the Incident happens to the Company's Employee, the sequence of actions and informing procedure shall be performed in accordance with clauses E-G of 6.2 process hereof.

If the Incident happens to the Contractor's (Subcontractor's) Employee, the sequence of further actions shall be performed in accordance with the Procedure on Interaction with Suppliers and Contractors in Health, Safety, Environment and Quality No. 522 dated 19.04.2018.

The Contract Supervisor shall inform HS Group (RGRES OHG), SEC, the Power Plant Manager about the results of the actions taken for further investigation of the Incident.

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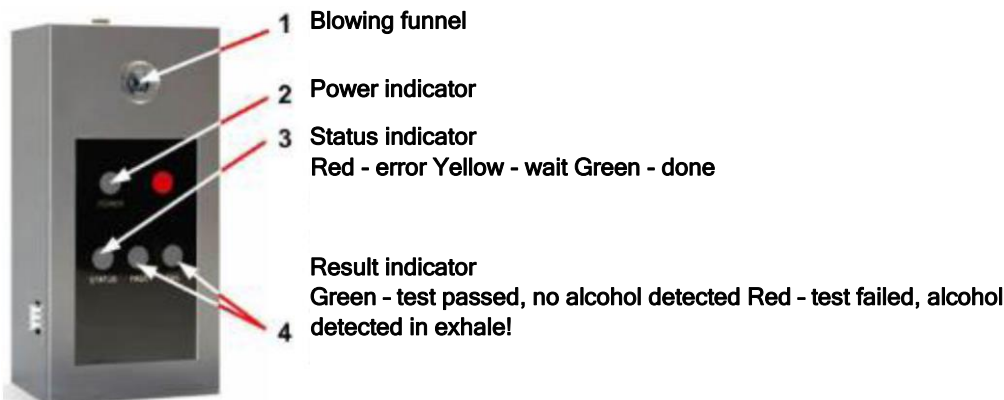
8. ANNEXES

8.1 Annex 1. Procedure for Alcohol Testing with Stationary Alcohol Tester Dingo B-01

1. The Employee approaches the alcohol tester. Then he/she should make sure that the status indicator on the alcohol tester is **green** (standby mode);
2. The Employee exhales into the alcohol tester funnel (1) at 5-10 cm for 2-3 seconds until there is a single audio signal. Then the status indicator (3) of the alcohol tester shall be **yellow** (analysis mode);

Important: triple short signal of the alcohol tester and **red** signal of the status indicator (3) indicates incomplete exhalation that results in repeated testing. In this case it is required to:

- Wait until the status indicator (3) shows **green**;
 - Exhale into the alcohol tester funnel (1) according to clause 2 hereof until **yellow** signal appears on the status indicator (3);
3. If no alcohol vapors are detected in the analyzed air (or their concentration is below the alcohol tester threshold), the result indicator (4) turns **green** and this means "**Normal**".
 4. When the level of alcohol vapors in exhaled air exceeds the established limit, the result indicator (4) turns **red** and this means "**Alcohol**".



5. If there is a deliberate violation of the alcohol testing procedure and any attempts to deceive the system, the Employee may be subject to disciplinary measures. The Employee shall bear the responsibility for non-compliance with the rules of the instruction.

Notes:

- Blinking indicators "Status", "Normal" and "Alcohol" are signals that the system is broken and disconnected;
- Measurement results in digital form are shown on the internal digital display located on the back cover of the device;
- To exhale into the alcohol tester funnel individual mouthpieces can be used.


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8.2 Annex 2. Procedure for Alcohol Testing with Portable Alcohol Tester Alcotest 6810" (Drager)


1. Alcohol tester activation. Press and hold down the bottom 



for about one second until the start screen is displayed and a single audio signal is activated.


2. Mouthpiece installation. Open the packing. Don't remove the packing from the part in contact with the mouth until the mouthpiece is correctly installed in the alcohol tester.

Place the mouthpiece diagonally (grooved side up) along guiding groove until bumping and press the mouthpiece into the holder. A click will confirm the right meshing. Remove all the packing.

3. In 2 seconds the following message will be displayed 

In 6 seconds the following message will be displayed 

and one short signal is activated. The  indicator is blinking. The employee inhales into the wide mouthpiece inlet. If the exhalation is correct, the continuous sound signal is activated and the  indicator is blinking.

During sampling the following message is displayed 

Once a sample is taken, the  indicator is off, continuous sound signal is off.

The display shows:  Analysis is in progress



In 5-25 seconds the results of ethanol mass concentration measurement in exhaled air are displayed as X.XX mg/l. At the same time the device produces 1 to 3 sound signals:

-Once – low level

-Twice – middle level

-Three times – high level

Errors in Analysis Procedure:

In case of incomplete or interrupted exhale the message "insufficient volume" is displayed, short signal is activated and  indicator is blinking. To repeat, press the bottom 

In 4-30 seconds the device will be ready to make measurements.

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8.3 Annex 3. Report Form**Report**

On Detecting the Signs of Drug Intoxication,
Detecting Excess Alcohol Fumes in Exhaled Air during the Alcohol Testing/ on Refusal to Undergo the
Alcohol Testing, Detect Drug Intoxication

“ _____ GRES” Power Plant

PJSC Enel Russia

Dated _____ 20

No. _____

I, _____,
(Position, full name)

In the presence of: _____;
(Position, full name)

(Position, full name)

(Position, full name)

Drew up this Report on the following:

Employee _____
(Position, full name)

_____ 20 _____ o'clock _____ min.

(The place where employee worked/was detected)

Has the following signs of alcohol (drug) intoxication: alcohol breath; loss of motion coordination; trembling fingers (tremor); irritability, aggressiveness; attention deficit; inadequate response to words and actions; incoherence; narrow pupils, pale skin (or red skin); glassy eyes, red eyes with dilated pupils, dry mouth, licking lips, continuous spitting out, indistinct speech when discussing different topics, excessive talking and gestures (underline as appropriate).

The alcohol testing detected the alcohol fumes in exhaled in the volume of _____ mg/L,
alcohol tester data: _____.

In view of the above _____
_____ was
(Employee's full name)

not admitted to _____ GRES (suspended).

To be filled in if the employee refuses to undergo medical examination



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The fact that _____
(Employee's full name)

Is in a state of alcohol intoxication cannot be confirmed by medical assessment, as the employee has refused to undergo medical examination on a voluntary basis.

The employee's explanation is attached or he/she refused to provide explanations (delete as appropriate)

(Employee's full name)

Shall be \ not be suspended until _____.

I accept (do not accept) the contents of this Report _____
(Employee's signature)

We acknowledge the content of this Report with personal signatures

Position	Date	Signature	Full name

Position	Date	Signature	Full name

Position	Date	Signature	Full name

I have read and understood this Report

Position	Date	Signature	Full name



PJSC Enel Russia

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8.4. Annex 4. Internal Memorandum Form

To HR Manager

“_____GRES” Power Plant of PJSC Enel Russia
by _____

(Full name)

(Position, unit)

Internal Memorandum

I request to suspend the employee working at the unit

(Position, full name)

For reason of _____

(specify the reason)

from _____ 20____

Annex:

The letter of explanation written by the suspended employee (if the employee provided any explanations)
dated _____ 20____

Report No. _____ on Detecting the Signs of Drug Intoxication, Detecting Excess Alcohol Fumes in Exhaled Air

Upon detection of drug intoxication, alcohol testing/refusal to undergo alcohol testing (underline as appropriate)

Laboratory results of medical examination _____ dated _____ 20____

dated _____ 20____

(Position, full name)

(Signature)

20____