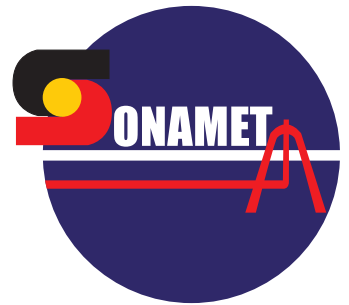


SUBSTANCE ABUSE POLICY



Sonamet is committed to providing a safe and healthy work environment for all employees. Compliance with this policy is the responsibility of each and every employee.

Sonamet recognises that the consumption of intoxicating liquor and drugs can have a detrimental effect on the health and safety of individuals and co-workers.

All employees are expected to be in a suitable mental and physical condition to perform their duties in a satisfactory manner and to behave appropriately.

No person at the workplace shall be under the influence of or have in his or her possession or partake of or offer any person intoxicating liquor or drugs.

The employer shall in case where a person is taking medicine, only allow such person to perform duties at the workplace if the side effects of such medicine do not constitute a threat to the health or safety of the person concerned or other person at such workplace.

An individual test for drugs or alcohol may be decided by Sonamet in compliance with local laws and regulations:

- Holders of a safety and environmentally sensitive position (position involving responsibility for and control for transportation or a position involving responsibility for storage, transportation, and handling of hazardous material such as fuel or explosives)
- Holders of a designated management position
- Holders of a position where testing is required by law
- Person who have had a abuse problem.

Sonamet recognises that dependency on any substance is a condition requiring care and support, and will extend sympathy and support to an individual who has been identified as having a dependency.

All Sonamet managers are required to ensure that their personnel do not allow the presence and abuse of intoxicating liquor or drugs on Sonamet facilities. Sub-contractors who perform safety and environmentally sensitive work are required to provide evidence of comprehensive drugs and alcohol policy and practices at least comparable to those in force within Sonamet.

In addition, Sonamet reserves the right to perform control audits of sub-contractors to verify compliance.

A handwritten signature in blue ink, appearing to be 'J. Barroso'.

José Barroso, General Manager
February 2009