



## TPS Group of Companies

<b>Title:</b> Health, Safety, and Environmental Policy	
<b>Locations:</b> All	<b>Document No:</b> POL-SAF-001
<b>Department:</b> Health & Safety	<b>Date of Issue:</b> February 27, 2006
<b>Approved by:</b> Kevin Pattison, President	<b>Review/Revision Date:</b> January 04, 2023

<b>Policy</b>	<p>Our Management Staff are committed to ensuring that all work performed for, or on its behalf, will be done legally, effectively, and safely.</p> <p><b>TPS Group of Companies is committed to:</b></p> <ul style="list-style-type: none"> <li>• Providing a safe and healthy work environment as indicated by acceptable industry practices and compliance with legislative requirements.</li> <li>• Eliminating any foreseeable hazards which may result in fires, security losses, damage to property and personal injuries/illnesses.</li> <li>• Controlling accidental loss through good management in combination with active employee involvement.</li> <li>• Maintaining and operating all equipment in a manner consistent with our objectives of ensuring a safe and effective workplace.</li> <li>• Requiring and demanding the use of safe working practices and methods, at all times.</li> <li>• Developing a workforce that is safety conscious while working towards eliminating personal and environmental hazards.</li> </ul> <p>Protection of workers from injury or occupational disease is a major continuing objective. All workers have the responsibility to make Health &amp; Safety a part of their daily routine and are required to work in a safe and productive manner that that protects not only their safety by the safety of other workers.</p> <p>Managers and Supervisors are responsible and accountable for the safety of all workers and/or contractors performing work under their supervision. It is the responsibility of each Manager and Supervisor to ensure all workers are adequately trained to enable them to perform their job functions in a safe and productive manner so as to prevent personal injuries, property damage and/or losses due to accident, fire and environmental hazards.</p> <p>TPS Group believes that these principles will not only enable us to meet or exceed our overall business goals but will ensure the health and safety of the workers, contractors, and our customers.</p>
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## TPS Group of Companies

<b>Title:</b> Health and Safety Responsibilities	
<b>Locations:</b> All	<b>Document No:</b> POL-SAF-002
<b>Department:</b> Health & Safety	<b>Date of Issue:</b> February 27, 2006
<b>Approved by:</b> Kevin Pattison, President	<b>Last Review/Revision Date:</b> January 04, 2023

<b>Management Responsibilities</b>	<ul style="list-style-type: none"> <li>• Comply with sections 25 and 26 of the occupational Health and Safety Act.</li> <li>• Complete MOL training or equivalent to Supervisor Health and Safety Awareness in 5 Steps or provide proof of previous completion.</li> <li>• Establish Health and Safety performance objective and priorities and review annually.</li> <li>• Ensure the working environment is maintained in a healthy and safe working condition.</li> <li>• Develop and demonstrate a positive Health and Safety attitude and working climate.</li> <li>• Hold employees accountable.</li> <li>• Be interested in and involved with Health and Safety performance.</li> <li>• Approve and enforce rules and procedures.</li> <li>• Require notification of all incidents and ensure incident investigations are conducted.</li> <li>• Understand and abide with relevant legislation.</li> <li>• Perform workplace inspections.</li> <li>• Ensure employee training on hazards and safety takes place annually.</li> <li>• Ensure safety tips are sent to employees.</li> </ul>
<b>Supervisor Responsibilities</b>	<ul style="list-style-type: none"> <li>• Comply with section 27 of the Occupational Health and Safety Act.</li> <li>• Complete MOL training or equivalent training to Supervisor's Health and Safety Awareness for 5 Steps or provide proof of training taken previously.</li> <li>• Train staff in Health and Safety Procedures.</li> <li>• Establish and amend standards.</li> <li>• Implement measures, controls, and follow-up systems, to monitor and audit Health and Safety performance.</li> <li>• Enforce rules, procedures, safe practices and health and safety standards.</li> <li>• Develop and implement inspection and maintenance program for assigned equipment.</li> <li>• Assist in the implementation of an emergency plan when necessary.</li> <li>• Correct unsafe acts and document them. Take the necessary corrective action to prevent a recurrence.</li> <li>• Inform management of any occupational Health and Safety concerns.</li> </ul>

	<ul style="list-style-type: none"> <li>• Fully understand the Occupational Health and Safety Act and the requirements under the legislation.</li> </ul>
<b>Worker Responsibilities</b>	<ul style="list-style-type: none"> <li>• Comply with section 28 of the Occupational Health and Safety Act.</li> <li>• Complete MOL training or equivalent training to Worker's Health and Safety Awareness for 4 Steps or provide proof of training taken previously.</li> <li>• Maintain acceptable mental and physical conditions for performance of work.</li> <li>• Know and employ safe job practices and procedures.</li> <li>• Know and employ established rules and procedures for handling hazardous materials, equipment, and processes.</li> <li>• Maintain personal protective equipment in good order.</li> <li>• Use all safety devices provided.</li> <li>• Use tools, equipment and materials in the manner intended.</li> <li>• Report all defects to your Supervisor.</li> <li>• Carry out repairs, alterations, and process changes, only when authorized.</li> <li>• Keep the workplace safe, clean, and orderly.</li> <li>• Report to your Supervisor all accidents and unusual conditions as soon as possible and report all injuries immediately.</li> <li>• Inspect your workplace daily and maintain it to the standards established by the Company.</li> </ul>
<b>Safety Representative Responsibilities</b>	<p>The Safety Committee consists of one certified member representing the employer and one certified member representing the employees and union members. They are required to meet on a quarterly basis and are responsible for the following:</p> <ul style="list-style-type: none"> <li>• Ensure the safety program is maintained and reinforced.</li> <li>• A committee representative will inspect the physical condition of the workplace on a quarterly basis and make recommendations in writing to the employer.</li> <li>• The representative will identify situations that may be a source of danger or hazard to the workers and report their finding to the committee and in writing to the employer. The employer then has twenty-one days to respond in writing.</li> <li>• The committee will establish the inspection schedule.</li> <li>• Make recommendations to the employer and the workers for the improvement of the Health and Safety of the workers.</li> <li>• Make recommendations to the employer and the workers on maintenance and upgrading of the Health and Safety Policy.</li> <li>• Monitoring old programs and establishing new programs and implementation of established policies and procedures.</li> <li>• Obtain information from the employer pertaining to the identification of potential or existing hazardous materials, processes, and equipment. Recommend crucial methods of ensuring employee safety during the exposure to these potential or existing dangerous conditions.</li> <li>• Obtain information from the employer regarding testing of equipment, machines, devices, chemical, or physical agents in or about a workplace for the purpose of occupational health and safety.</li> </ul>

- Reviewing concerns and suggestions in respect to industrial health and safety and recommending corrective action.
- Reviewing the reports of current accidents or industrial diseases, their causes and means of prevention.
- The committee shall maintain and keep minutes of its proceedings and submit them to the office to make them available for examination and review by an inspector. The minutes will be posted on the safety board for ease of access by all employees.
- A committee will be responsible for the investigation of cases where a worker is killed or critically injured at the workplace. They will inspect the site, machine, and device or any other relevant thing pertaining to the incident.



## TPS Group of Companies

<b>Title:</b> Harassment, Violence and Discrimination in the Workplace	
<b>Locations:</b> All	<b>Document No:</b> POL-SAF-014
<b>Department:</b> Health & Safety	<b>Date of Issue:</b> October 07, 2020
<b>Approved by:</b> Kevin Pattison, President	<b>Review/Revision Date:</b> January 04, 2023

<b>Policy</b>	<p>TPS Group of Companies is committed to providing a work environment in which the safety, worth, dignity and rights of individuals are respected and protected.</p> <p>Every person has a right to freedom from <b>harassment, violence, and discrimination</b> in the workplace, both psychological and physical. As a company, we have a legal responsibility and are committed to providing a workplace free from harassment, violence, and discrimination by the company, agent of the company or by another person because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offenses, marital status, family status or handicap.</p> <p>Workplace harassment means,</p> <ul style="list-style-type: none"> <li>• Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or</li> <li>• Workplace sexual harassment</li> </ul> <p>Workplace sexual harassment means,</p> <ul style="list-style-type: none"> <li>• Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or</li> <li>• Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.</li> </ul> <p>A reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.</p> <p>Workplace violence is the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. It also includes an:</p>
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- Attempt to exercise physical force against a worker in a workplace, that could cause physical injury to the worker; and a
- Statement or behaviour that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Managers, supervisors, and workers are expected to adhere to this policy and will be held responsible by the employer for not following it. Any such action(s) of harassment, violence, and/or discrimination are explicitly prohibited. However, the company will provide assistance to any person who has been exposed to any such action(s). Persons found guilty of violating these principles will be subject to disciplinary action up to and including termination.

Any person who believes they are a victim or has knowledge of any incidents of workplace harassment, violence, and/or discrimination are encouraged to report the incident to their JHSC worker rep, Human Resources, Supervisor or Management. Such persons have not only legal protection from reprisal, but also our pledge to thoroughly investigate and resolve all complaints/incidents/and/or charges of harassment, violence, or discrimination.



## TPS Group of Companies

<b>Title:</b> Substance Use and Impairment	
<b>Locations:</b> All	<b>Document No:</b> TBA
<b>Category:</b> Health & Safety	<b>Date of Issue:</b> Feb 27, 2006
<b>Approved by:</b> Kevin Pattison, President	<b>Last Review/Revision Date:</b> Nov 3, 2020

<b>Policy</b>	<p>TPS Group of Companies (TPS Group) is committed to the health and safety of its employees and has adopted this policy to communicate its expectations and guidelines surrounding substance use and impairment.</p> <p>TPS Group has a “zero tolerance” policy for employee substance use causing impairment while at work. Employees under the influence of drugs and/or alcohol on the job can pose serious health and safety risks to both themselves and their fellow employees.</p> <p><b>Expectations</b></p> <p>The following expectations apply to employees and management alike while conducting work on behalf of the company, whether on or off company property:</p> <ul style="list-style-type: none"> <li>• Employees are expected to arrive to work fit for duty and able to perform their duties safely and to standard;</li> <li>• Employees must remain fit for duty for the duration of their shift;</li> <li>• Use, possession, distribution, or sale of drugs or alcohol during work hours, including during paid and unpaid breaks, is strictly prohibited;</li> <li>• Employees are prohibited from reporting to work while under the influence of recreational cannabis (whether ingested or used topically) and any other non-prescribed substances;</li> <li>• Use and possession of medically prescribed substances is permitted during working hours, where an employee has a legitimate prescription for medical purposes AND the use of the prescribed substance for medical purposes does not cause impairment in the employee;</li> <li>• Employees on medically prescribed substances must communicate to management any potential risk, limitation, or restriction requiring modification of duties or temporary assignment; and</li> <li>• Employees are expected to abide by all governing legislation pertaining to the possession and use of cannabis.</li> </ul> <p><b>Roles and Responsibilities</b></p> <p>Management will:</p> <ul style="list-style-type: none"> <li>• Identify any situations that may cause concerns regarding an employee's ability to safely perform their job duties;</li> </ul>
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- Ensure that any employee who asks for help due to a drug or alcohol dependency is provided with the appropriate support (including accommodation) and is not disciplined for doing so; and
- Maintain confidentiality and employee privacy.

Employees must:

- Abide by the provisions of this policy and be aware of their responsibilities under it;
- Arrive to work fit for duty, and remain so for the duration of their shift;
- Perform work safely in accordance with established work practices;
- Avoid the consumption, possession, sale, or distribution of drugs or alcohol on company property and during working hours (even if off company property);
- When off duty, refuse a request to come into work if unfit for duty;
- Report limitations and required modifications as a result of prescription medication;
- Report unfit co-workers to management;
- Seek advice and appropriate treatment, where required;
- Communicate dependency or emerging dependency to management or human resources.

An employee receiving treatment for substance dependency (alcohol or drug addition illness) will be entitled to job protection until such time that rehabilitation can be proven.

### **Definitions**

Drug: Any substance which can change or adversely affect the way a person thinks or feels, whether obtained legally or illegally. This could include recreational cannabis (in any form), cocaine, opiates, and amphetamines.

Drug Paraphernalia: Material or equipment used or intended for use in injecting, ingesting, inhaling, or otherwise introducing a drug, illegal or controlled, into the human body.

Medication: Includes a drug obtained legally, either over the counter or through a prescription issued by an authorized medical practitioner. For this policy, medications of concern are those that inhibit a worker's ability to perform their job safely and productively.

Alcohol: Any beverage containing any quantity of alcohol, including beer, wine, and distilled spirits.

Substance Abuse: Refers to the harmful or hazardous use of substances, including alcohol and illicit drugs.

Impairment: For this policy will mean the appearance of impairment at work (i.e. smelling of alcohol or drugs, glassy or red eyes, unsteady gait, slurring)



	<p><u>Workplace</u>: All offices, buildings, vehicles, and client sites where TPS Group business is conducted.</p>
<p><b>Procedure</b></p>	<p><b>Suspicion of Impairment</b></p> <p>The following may be enacted if there is reasonable belief that an employee is impaired at work:</p> <ol style="list-style-type: none"> <li>1. If possible, the employee's manager or supervisor will first seek another manager's or supervisor's opinion to confirm the suspicion of impairment.</li> <li>2. Next, the manager or supervisor will consult privately with the employee to determine the cause of the observation, including whether substance abuse has occurred. Suspicions of an employee's ability to function safely may be based on specific personal observations. If the employee exhibits unusual behaviour including but not limited to slurred speech, difficulty with balance, watery or red eyes, or dilated pupils, or of there is an odor of alcohol, the employee should not be permitted to return to their assigned duties in order to ensure their safety and the safety of other employees or visitors to the workplace. <b><u>If the employee works in a safety sensitive position, they may be required to undergo Roadside testing and/or Drug and Alcohol testing.</u></b></li> <li>3. If an employee is considered to be impaired and deemed "unfit for work", this decision is made based on the best judgement of two members of management and DOES NOT require a breathalyzer or blood test. The employee may be advised that TPS Group has arranged a taxi service to safely transport them to their home address or to a medical facility, depending on the determination of the observed impairment. The employee may be accompanied by a manager, supervisor or another employee if necessary.</li> <li>4. An impaired employee will not be allowed to drive. The employee should be advised if they choose to refuse employer-organized transportation and decide to drive their personal vehicle, the company is obligated to and will contact the police to make them aware of the situation.</li> <li>5. A meeting may be scheduled for the following workday to review the incident and determine a course of action.</li> </ol> <p><b>Drug and Alcohol Testing</b></p> <p>When an employee is to undergo testing, they will be removed from duty and escorted to a designated area to complete the necessary paperwork. As soon as the appropriate paperwork has been completed, the employee will be sent to a designated lab, where one or both of the following tests will be conducted:</p> <ol style="list-style-type: none"> <li>1. Blood Alcohol Test</li> <li>2. Drug Urine (covers marijuana, phencyclidine, cocaine, amphetamines, and opiates)</li> </ol> <p>The results of the tests, when available, will be communicated by the clinic to TPS Group management. Test results are confidential and will not be made known to anyone except TPS Group Management. The only exception is if the employee requests in writing that the results be forwarded to their physician.</p>

If it is determined that the Drug Urine Test has been contaminated, tampered with, or replaced, it will be reported by the clinic and will be treated as a refusal to test.

In the event that the testing was done to verify a suspected infraction, it is at the discretion of TPS Group Management as to whether or not the employee returns to work pending the results from the lab. Should the results of the Drug and Alcohol testing come back negative, the employee will be compensated for the days they were not at work (excluding the first day). If the results are positive for an infraction, the employee will not be compensated for their time not at work and disciplinary action up to and including termination of employment will be taken.

### **Roadside Testing Protocol**

A Roadside Test is a test of equilibrium (balance), reflexes and mental acuity, consisting of standing on one foot and then the other, walking in a straight line, touching one's nose with the forefinger of each hand, saying the alphabet backwards or counting by twos. Although sometimes a judgement call, failure of the test is often obvious and may be supplemented by reports of slurred speech, bloodshot eyes, the smell of alcohol and answers to simple questions such as "How much did you have to drink?", or "Do you know where you are?".

A Roadside Test can be administered by TPS Group Management, or in their absence, a member of the Joint Health and Safety Committee. Should the employee disagree with the decision they can request that a Drug and Alcohol test be conducted; the request for testing needs to be made immediately. If a Drug and Alcohol test is conducted, the employee will be sent home for the day without pay as the results from the lab will not be available that day and safety in the workplace is held paramount.

### **Medical Cannabis**

Where an employee uses medical cannabis, TPS Group expects that they provide a copy of their medical documentation and abide by the company's accommodation policy.

### **Substance Dependency**

TPS Group understands that certain individuals may develop a chemical dependency to certain substances, which may be defined as a disease or disability. Employees are not excused from their duties as a result of their dependencies. TPS Group promotes early diagnosis; any employee who suspects that they might have an emerging drug or alcohol problem is expected to seek appropriate treatment promptly.

The company will work with any employee who requests accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable, up to the point of undue hardship. Employees are encouraged to communicate any need for accommodation to their immediate supervisor, and to work with them in addressing the concern.

	<p>Should an employee be seeking treatment for substance dependency, they will not be permitted to return to work until they can produce a medical note indicating that they have been rehabilitated.</p> <p><b>Disciplinary Action</b></p> <ul style="list-style-type: none"> <li>• Employees who arrive to work unfit for duty and unable to perform their duties safely and to standard will be immediately sent home without pay and may be subject to disciplinary action up to and including termination of employment.</li> <li>• Any employee found to be consuming substances at work without permission will be subject to disciplinary action up to and including termination of employment.</li> <li>• Employees engaging in illegal activities (for example, selling drugs or alcohol while on company premises will be subject to disciplinary action up to and including termination of employment.</li> <li>• Employees who return a positive result from Drug and Alcohol testing will be subject to disciplinary action up to and including termination of employment.</li> <li>• Employees who have either relapsed or have not been successful in a rehabilitation program, despite workplace accommodation, may be terminated if there is a recurring impact on job performance and/or the work environment.</li> </ul>
<p><b>Materials/ Resources</b></p>	<p>ConnexOntario – Mental Health, Addiction and Problem Gambling Services</p> <ul style="list-style-type: none"> <li>• 1-866-531-2600</li> <li>• <a href="https://www.connexontario.ca/en-ca/contact-us">https://www.connexontario.ca/en-ca/contact-us</a></li> </ul>



<b>Title:</b> Cell Phone Policy	<b>Date of Issue:</b> January 25, 2016
<b>Location:</b> All	<b>Date of Revision:</b> August 25, 2020

The purpose of this Policy is to eliminate the use of cell phones and other communication devices while at work in order to protect the employee and their co-workers. Inappropriate use of communication devices at work can cause injuries because it's distracting, interfere with job performance and, displays unprofessionalism toward our customers.

The devices covered by this Policy include cell phones, Blackberries, text pagers, two-way radios, and other wireless devices and applies to all employees. The rules set out in this Policy apply to all work-related activities. The Policy applies to all conversations, whether personal or business-related.

While in the workplace during work hours, workers are expected to focus on work and may not inappropriately use any device in the workplace for any purposes, including but not limited to: engaging in personal conversations; Facebook; playing games; surfing the internet; checking e-mail; and, sending or receiving text messages. Workers may use devices while on their designated break period.

Workers who violate this Policy will be subject to disciplinary measures to be determined by the Company. Any negligence or workplace accidents caused by employee cell phone use are subject to immediate termination.

**Exemption:** *As per job requirements, Confined Space Attendants will require two-way radios for constant communication with entrants of the confined space. Also, Confined Space Attendants/Rescuers Working Lead will have a cell phone on-site in case of emergency.*



## TPS Group of Companies

<b>Title:</b> Smoking Policy	
<b>Locations:</b> All	<b>Document No:</b> POL-SAF-036
<b>Department:</b> Health & Safety	<b>Date of Issue:</b> January 25, 2017
<b>Approved by:</b> Kevin Pattison, President	<b>Review/Revision Date:</b> January 04, 2023

<b>Policy</b>	<p>This facility is declared as a smoke free facility, Smoking is banned from any/all enclosed workplaces.</p> <p>Enclosed workplace is defined as:</p> <ul style="list-style-type: none"> <li>any building, vehicle or enclosure with a roof and two (2) walls, regardless of size, that employees work in or have access to during the course of their employment whether or not they are acting in the course of their employments at that time.</li> </ul> <p>This would include, but is not limited to:</p> <ul style="list-style-type: none"> <li>within the confines of this facility,</li> <li>inside and/all company vehicles</li> <li>inside trailers docked at any loading/unloading door</li> <li>any outside smoking area which falls under the guidelines of "enclosed workplace."</li> </ul> <p>Therefore, no worker, tenant, contractor, customer or representative of the company will avail themselves to smoking under the above mentioned guidelines.</p> <p>Smoking includes carrying a lighted cigar, cigarette or pipe.</p> <p>Smoking is only permitted at appropriately designed and/or designated locations which are totally separated from the main structure and do not fall under the definition of an enclosed workspace.</p> <p>Where applicable — Municipal By-Laws will supersede this policy—</p>
<b>Requirements and Enforcement</b>	<p>Each location shall post appropriate signage at all entrances/exits &amp; washrooms</p> <p>All smoking related paraphernalia (ashtrays) shall be removed.</p> <p>All violations of this policy are to be reported to Management immediately.</p> <p>It is Management's commitment to ensure this policy is communicated, posted &amp; enforced.</p>

All violations of this policy shall be dealt with through the normal corrective action process which would include action up to and including termination of employment.



## TPS Group of Companies

<b>Title:</b> Disconnecting from Work Policy	
<b>Locations:</b> All	<b>Document No:</b> POL-HR-001
<b>Category:</b> General	<b>Date of Issue:</b> June 2, 2022
<b>Approved by:</b> Kevin Pattison, President	<b>Last Revision Date:</b> September, 2022

<b>Purpose</b>	In compliance with the <i>Employment Standards Act, 2000</i> and <i>Bill 27, Working for Workers Act, 2021</i> , the purpose of this Policy is to outline TPS Group of Companies' (TPS) commitment to supporting employees in balancing their working and personal lives and to encourage employees to disconnect from work outside of their working hours in accordance with and subject to this Policy.
<b>Scope</b>	This Policy applies to all employees of TPS Group of Companies.
<b>Policy</b>	<p>Disconnecting from work is important for an individual's wellbeing, and helps employees achieve a healthy and sustainable work-life balance. Disconnecting from work means not engaging in work-related communications, including emails, telephone calls, video calls or the sending or reviewing of other messages, so as to be free from the performance of work outside of working hours including when working in an approved flexible work arrangement, such as remote work or working non-standard business hours.</p> <p><b>Ability to Disconnect from Work</b></p> <p>An employee's ability to disconnect from work depends on TPS' business and/or operational needs and the duties and obligations of the employee's position.</p> <p>While employee working hours will vary within TPS, each employee's hours of work are defined by past practice, their employment contract and/or by agreement with their manager. If you have any questions regarding your normal hours of work, please consult with your manager or HR.</p> <p>It is generally expected that all employees are able to complete their work, including reviewing and responding to any work-related communications, during their normal hours of work. The Company has no expectation that employees engage in work or work-related communications outside of their normal hours of work, subject to the exceptions detailed below.</p>

## Exceptions

There are situations when it is necessary for employees to perform work or communicate with colleagues outside of their normal hours of work, including, but not limited to the following:

- Where an emergency or exigent circumstances arise, with or without notice
- To assist or fill in at short notice for a colleague
- Where the nature of the employee's duties requires work and/work-related communications outside of their normal hours of work
- Unforeseeable business or operational reasons
- An employee's request or agreement to work certain hours or have flexible working hours; and
- Other unusual circumstances as your manager may advise or which are inherent to your position

## TPS and Employee Obligations

TPS, its management and employees must work together to ensure that everyone is able to disconnect from work outside of normal working hours in accordance with this Policy.

### TPS' Obligations

While this Policy does not preclude TPS employees from contacting individuals (including other Employees or vendors/third parties) for work related purposes outside of what may be considered working hours, TPS supports and aims to foster a workplace culture that promotes and values disconnecting from work. Consequently, TPS will take steps to:

- a. Inform employees of their regular working hours, where applicable;
- b. Encourage employees to be mindful and respectful of the time when other employees – including those without formally designated hours of work – can reasonably expect to disconnect from work;
- c. Encourage employees to make best efforts to refrain from contacting other employees for work-related purposes at such times, and,
- d. Request that managers, or, as appropriate, HR, respond to questions or concerns regarding disconnecting from work from employees.

### Employee Obligations

Employees are expected by TPS to undertake the following with respect to their work:

- a. To co-operate fully with any mechanisms, if applicable, utilized by TPS to record working time or update their working status, including when working remotely, flexibly or when mobile;



	<ul style="list-style-type: none"> <li>b. To be mindful of other employees' working hours and their time outside such hours; and</li> <li>c. Raise any concerns or issues they may have which they feel are impacting their ability to disconnect from work with their manager or, where appropriate, HR.</li> <li>d. By making best efforts to refrain from routinely emailing or calling outside of working hours or expecting answers or responses outside of working hours.</li> </ul>
<b>Compliance</b>	<p>TPS shall provide a copy of this Policy to each employee, regardless of position within 30 calendar days of implementation. Should any changes be made to the Policy after its implementation, TPS shall provide each employee of TPS with a copy of the revised Policy within 30 days of the changes being made.</p> <p>TPS shall provide a copy of this policy to all new employees within 30 calendar days of the employee commencing employment with TPS.</p> <p>TPS shall retain a copy of this Policy and any revised version of this Policy for a period of three years after it ceases to be in effect.</p>
<b>Resources</b>	<ul style="list-style-type: none"> <li>• Ontario Working for Workers Act, 2021, S.O. 2021, c.35 – Bill 27</li> <li>• Ontario Employment Standards Act, 2000, S.O. 2000, c.41</li> <li>• Ontario Occupational Health and Safety Act, R.S.O. 1990, c. 0.1</li> </ul>



## TPS Group of Companies

<b>Title:</b> Electronic Monitoring of Employees Policy	
<b>Locations:</b> All	<b>Document No:</b> POL-HR-002
<b>Category:</b> General	<b>Date of Issue:</b> Oct 11, 2022
<b>Approved by:</b> Kevin Pattison, President	<b>Last Revision Date:</b> Jan 30, 2023

<b>Policy</b>	<p>The purpose of this Electronic Monitoring Policy is to provide transparency about TPS Group of Companies' (TPS) use of electronic monitoring tools for employee activity and outline TPS' electronic monitoring practices.</p> <p>TPS uses various electronic monitoring tools in different circumstances and for different purposes. TPS does not actively monitor employees using electronic means for the purpose of employee performance management as a normal course of business.</p> <p><b>Electronic Monitoring</b> refers to employee monitoring that is done electronically.</p> <p>The following Table outlines how and in what circumstances TPS uses electronic monitoring tools, and the purposes to which information obtained through electronic monitoring tools may be used by TPS.</p>			
	<b>Electronic Monitoring Tool</b>	<b>Circumstances in Which Monitoring May Occur</b>	<b>How Electronic Monitoring Occurs</b>	<b>Purpose(s) For Which the Collected Information May be Used</b>
	GPS/GEO TAB	All fleet vehicles during use	On board sensors detect and report on vehicle location and driver behaviour (hard braking, rapid acceleration, etc.)	Fleet management, driver safety and security
	IT Security Software	Continuous	Software tracks and triggers events for suspicious or risky user activity.	Network Security
	Email Tracking	Continuous	Software records copies of all messages sent or received by addresses within TPS' domain.	Network Security
	Firewalls/VPN	Continuous	Network Security programs and tools to monitor the use and access of TPS systems and networks.	Network Security

	Video Camera Systems (property and facilities)	Continuous	Cameras record video footage of specific areas within TPS' properties and facilities.	Facility security, employee and asset protection.
	Collaboration and Learning Management software and tools i.e. Salesforce, Bistrainer	Continuous	Software monitors access and use.	Service delivery and productivity monitoring.

In addition to the purposes listed above, TPS may use any electronic monitoring tools for the purposes of monitoring, evaluating or investigating employee performance, behaviour or conduct, including whether to issue an employee discipline, up to and including termination of employment. TPS values employee privacy and its use of any electronic monitoring tools for employment-related or disciplinary purposes is discretionary. TPS' use of any electronic monitoring tools for employment-related purposes is further subject to any rights an employee may otherwise have per their employment contract or otherwise at law.

This Policy does not provide employees any new privacy rights or a right to not be electronically monitored. Nothing in this Policy affects or limits TPS' ability to conduct, or use information obtained through, electronic monitoring.

In the event TPS collects any personal information, as defined in the *Freedom of Information and Protection of Privacy Act (FIPPA)*, when using the electronic monitoring tools listed above, TPS shall collect, use and disclose personal information in accordance with applicable legislation, including, but not limited to, FIPPA.

<b>Compliance</b>	<p>1) TPS will provide all current employees with access to or a copy of this Policy within 30 calendar days of implementation.</p> <p>2) TPS will provide all employees hired after this Policy is first implemented with access to or a copy of this Policy (or the applicable revised version) within 30 calendar days of the employee's start date.</p> <p>3) The policy may be amended from time to time at TPS' sole discretion. In the event this Policy is amended, TPS will provide each employee with access to or a copy of the amended Policy within 30 calendar days of the date the amendment(s) become effective.</p> <p>4) TPS will provide a copy of this Policy to assignment employees assigned to perform work for the TPS within 24 hours of the start of the assignment or within 30 days of the Policy's implementation, whichever is later.</p> <p>5) TPS shall retain a copy of this Policy and any revised version of this Policy for a period of three (3) years after it ceases to be in effect.</p>
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