

EMPLOYEE HANDBOOK

CASTLE BUILDING CENTRES GROUP LTD.

(Confidential)



Revised and Updated December 2023

PREFACE

IN THIS SECTION

Welcome to Castle Building Centres Group Ltd.: III
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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.



WELCOME TO CASTLE BUILDING CENTRES GROUP LTD.:

At **Castle Building Centres Group Ltd.**, we value our employees as an important resource. Over the years, we have established policies and developed programs and practices to ensure our continued success. Our team is innovative and cooperative and I know that you will enjoy growing with us.

This employee handbook will provide you with information about your employment and give you an inside look at the philosophy and culture of our Company. For additional information, do not hesitate to contact your Manager or the Vice President of Finance.

This handbook is yours to keep, read and use whenever the need arises.

To all of our employees who, over the years, have contributed to our growth and success, thank you. To our new members, we say welcome to **Castle Building Centres Group Ltd.** We hope that you will find job satisfaction with us in an environment that is pleasant and supportive.

Sincerely,

Ken Jenkins

President

A WORD ABOUT THIS HANDBOOK

This Employee Handbook contains information about the employment policies and practices of **Castle Building Centres Group Ltd.** We expect and encourage each employee to read this Employee Handbook carefully. It is a valuable reference for understanding your job. The Company retains the right to make decisions involving employment as needed in order to conduct its work in a manner that is beneficial to the employees and the company and which complies with all relevant legislation. This Employee Handbook supersedes and replaces any and all prior Employee Handbooks and inconsistent verbal or written policy statements. The Company reserves the right to modify the provisions of this Employee Handbook. All such modifications will be in writing and must be signed by the President. No oral statements or representations can change the provisions of this Employee Handbook.

This Employee Handbook is designed to answer any questions you may have with **Castle Building Centres Group Ltd.** and your employment with our Company and will also explain our policies and procedures. We ask that you keep this information confidential outside of the workplace. It is important to note that legislation and local jurisdiction will always take precedent over the policies in this Handbook.

The provisions of this Employee Handbook are not intended to create contractual obligations with respect to any matters it covers. Additionally, this Employee Handbook is not intended to create a contract guaranteeing that you will be employed for any specific time period.

As our policies and procedures change, you will be provided with updates.

Should you have any questions or concerns, please do not hesitate to contact your Manager or the Vice President of Finance.

ACKNOWLEDGEMENT

I am aware that a copy of the **Castle Building Centres Group Ltd.** Employee Handbook is available electronically via the intranet, that I have been advised how to access it, and acknowledge my obligation to read and understand its contents.

I understand and agree that the handbook is intended to provide an overview of the Company's employee policies and does not necessarily represent all such policies in force. I also understand that the enclosed Company policies and practices do not create or express an implied contract or covenant of any type between the Company and myself.

I am aware that during the course of my employment confidential information will be made available to me, for instance, vendor agreements, marketing strategies, member lists, pricing policies and other related information. I understand that this information is proprietary and critical to the success of the Company and must not be given out or used outside of Company premises or with non-Company employees. In the event of termination of employment, whether voluntary or involuntary, I hereby agree not to utilize or exploit this information with any other individual or company.

The Company may at any time, add, change or rescind any policy or practice at its sole discretion, without notice.

Employee Name (Please Print)

Employee Signature

Date

Manager Name (Please Print)

Manager Signature

Date

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Section 1

INTRODUCTION

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

OUR HISTORY:

Castle is the largest NATIONAL buying group for lumber, building materials and hardware in Canada with Members from coast to coast. It was incorporated in 1963 (as BOLD Lumber) to maximize the buying power of independent retailers of lumber and building materials.

The principal function of the **Castle** Buying Office is to negotiate optimal buying arrangements including the collection and distribution of volume rebates, paying suppliers on behalf of our members and collecting members' payment for such payments.

Castle Shareholders (Members) derive many other benefits as a result of their affiliation with our group.

Castle is owned equally by its Members who are represented by a Board of Directors of nine elected representatives from their member base.

Members are also encouraged to participate in one of the Area Groups (based on their geographical location), each of which is directed by an elected Area Group Leader.

MISSION STATEMENT:

Castle Building Centres Group Ltd. mission is to:

"MAXIMIZE EACH MEMBERS' PROFITABILITY AND GROWTH".

By continually providing exceptional service to its members the Company endeavors to meet this goal.

SHAREHOLDER'S MISSION:

The Shareholders of **Castle Building Centres Group Ltd.** are independent retailers of lumber, building materials and hardware and operate on the premise of

"YOUR TRUSTED BUILDING SUPPLY PARTNER".

BELIEFS AND PHILOSOPHY:

The Members and employees are the Company's most important assets. The **Castle** buying office emphasizes a service culture to ensure that each and every Shareholder receives the best possible service that can be provided.

Employees make a vital contribution to the Company's success by understanding who our Members are, what they need to be successful and anticipating how to help them even before they ask. Honesty and integrity are the cornerstones of the Company's relationship with its Members.

Section 2

GUIDING PRINCIPLES AND STANDARD PRACTICES

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MANAGEMENT COMMITMENT:

We promise to listen to your concerns with respect and provide a supportive work environment. We accept responsibility for providing safe and favourable working conditions, competitive compensation and benefits, recognition and rewards, and fostering diversity in the workplace.

OPEN DOOR POLICY:

An "Open Door Policy" is maintained in our Company, which means that we value your input and want to know your concerns in order to deal with them effectively.

- ▶ We encourage you to discuss problems, concerns, ideas and decisions etc. with your Manager.
- ▶ Confidentiality is expected to be maintained in all matters.

FREEDOM FROM DISCRIMINATION:

At **Castle Building Centres Group Ltd.**, we pride ourselves on conducting business in a non-discriminatory manner.

- ▶ We guarantee that every person has the right to be treated with respect in the workplace and will endeavour at all times to provide a work environment that supports diversity and inclusion and the personal goals, dignity and self-esteem of every person.
- ▶ This non-discriminatory policy applies to hiring, training, placement, promotion, termination, retirement, layoff, recall, transfer, leaves of absence, and compensation.
- ▶ The responsibility for creating and maintaining a positive work environment rests with all of us. In addition to avoiding discrimination, **Castle Building Centres Group Ltd.** will not, and employees must not, condone behaviour in the workplace that is likely to undermine work relationships or productivity. Managers, supervisors and co-workers are expected to recognize and refrain from actions that offend, embarrass or humiliate others, whether deliberate or unintentional.
- ▶ Management has a responsibility to respond immediately to stop any activity in the workplace that undermines this policy, whether or not there has been a complaint. Employees have an equal responsibility not to be frivolous, vexatious or vindictive in making accusations. However, inaction on the part of any individual may result in disciplinary action.

EQUAL EMPLOYMENT OPPORTUNITY:

At **Castle Building Centres Group Ltd.**, we pride ourselves on hiring and development practices that are non-discriminatory, job-related and applied equally via measurable, objective criteria.

- ▶ We are an Equal Employment Opportunity Employer.
- ▶ Our commitment to equal opportunity extends to all aspects of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training. It also applies to employees returning from work due to illness or disability.
- ▶ It is **Castle Building Centres Group Ltd.'s** policy to provide equal opportunity for all qualified employees and applicants for employment without regard to race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, religion, sex, sexual orientation, gender, gender identity, gender expression, age, criminal record that is unrelated to the position in question/criminal record for which a pardon has been granted or conviction for a provincial offence, marital status, family status or disability, or any other prohibited ground of discrimination as enumerated in the applicable human rights legislation. Reasonable accommodation will be made for persons with disabilities.

ACCESSIBILITY STATEMENT:

At **Castle Building Centres Group Ltd.**, we are committed to ensuring that we provide a safe, welcoming, barrier-free and accessible environment for our employees, job applicants, members, prospects, suppliers, visitors and other stakeholders who enter onto our premises, do business with us, access our website or communicate with us. This applies in relation to employment with our Company, and with respect to areas such as customer service, the built environment, information and communication, and transportation. With approximately 15% of the population having some type of disability, accommodating employees, job applicants and customers with disabilities not only makes good business sense and is the right thing to do – it's also the law!

As an organization, we are responsible for ensuring that our employees, as well as our facilities, policies, business practices and systems comply with the governing legislation and relevant best practices with regard to the accessibility and accommodation of individuals with disabilities in a way that promotes their dignity and independence. To that end, we have implemented policies and training programs for employees which address specific issues. These programs are tailored to particular groups of managers and employees, and include information on topics such as:

An overview of the governing legislation (including the *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005*, its regulations and accessibility standards):

- ▶ non-discriminatory job posting, interviewing and hiring practices;
- ▶ accommodating employees and job applicants with disabilities;
- ▶ communicating with members with various types of disabilities;
- ▶ communicating clearly and concisely by telephone;
- ▶ the use of assistive devices and alternatives to telephone communications;
- ▶ the use of service animals and support persons;
- ▶ the provision of accessible invoices/bills;
- ▶ notices of temporary disruptions; and
- ▶ relevant policies, practices and procedures.

With respect to recruitment, all of our job postings include an accessibility and accommodation statement. We also require that all hiring managers notify candidates who are selected for interviews that accommodation is available for individuals with disabilities upon request. They must inform successful candidates about our policies for accommodating employees with disabilities when making verbal offers. Hiring managers are required to work with candidates and the Vice President of Finance in determining the appropriate accommodation and ensuring such accommodation is available.

We all have a part to play in ensuring that employees, job applicants, members, prospective members and other stakeholders with disabilities are treated fairly and in a manner that respects their dignity and independence. Further information on our full Accessibility Policy and our training programs is available by contacting your Manager.

IMMIGRATION LAW COMPLIANCE:

At **Castle Building Centres Group Ltd.**, we abide by all applicable immigration legislation when making hiring decisions and pride ourselves on using a non-discriminatory approach:

- ▶ we will employ Canadian citizens and those who are authorized to work in Canada; and
- ▶ we do not discriminate based on citizenship or place of origin.

Should you have any questions or concerns, you may contact the Vice President of Finance without fear of reprisal.

PAY EQUITY:

At **Castle Building Centres Group Ltd.**, we pride ourselves on an equitable system of compensation for our employees that complies with all governing Pay Equity legislation requirements.

- ▶ Employees are paid equally for work of equal value.
- ▶ The "value" of jobs is based on the levels of skill, effort, responsibility and working conditions involved in doing the work.

Should you have any questions or concerns, please contact the Vice President of Finance.

EQUAL PAY FOR EQUAL WORK:

Effective January 1, 2019, all employees performing substantially the same kind of work requiring the same skill, effort and responsibility under similar working conditions will receive the same rate of pay, regardless of gender.

- ▶ However, differences in the rate of pay can be made on the basis of:
 - a. a seniority system;
 - b. a merit system;
 - c. a system that measures earnings by quantity or quality of production; or
 - d. any other factor other than gender.

"Substantially the same" means substantially the same; but not necessarily identical.

- ▶ When evaluating the equality of the range of pay rates for a particular position within our Company, no employees will have their rate of pay reduced in order to ensure compliance with all legislative requirements.
- ▶ You may request a review of your rate of pay if you believe that inequality exists.

Note: If you are a student under 18 years of age, working less than 28 hours per week or employed during a school holiday, you are exempt from the Equal Pay for Equal Work provision.

HARASSMENT - EMPLOYEE RIGHTS:

You have the right to freedom from discrimination and harassment in the workplace by **Castle Building Centres Group Ltd.** or our agents (suppliers, members, contract workers, etc.) or by another employee; whether on the grounds of race, ancestry, place of origin, religion, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender, gender identity, gender expression, age, disability, record of offences for which a pardon has been granted, marital status, family status **or any other prohibited ground** under the governing human rights legislation.

- ▶ At **Castle Building Centres Group Ltd.**, we respect the rights of each employee and comply with all legislation designed to protect employee rights and freedoms.

For more information, please refer to our Violence and Harassment in the Workplace policy (on page 32) or contact your Manager.

PROTECTION OF PRIVACY:

Castle Building Centres Group Ltd. recognizes that your right to privacy is an important issue. We understand your interest in protecting your private personal information while working with us. As a result, we manage your personal information with great care as reflected through this privacy policy (also see Employee Files).

- ▶ While we have always tried to ensure your personal information is protected, our privacy policy provides you with all of the safeguards as standardized in Federal and/or provincial privacy legislation.

GENERAL APPLICATION:

At **Castle Building Centres Group Ltd.**, our privacy policy applies to all personal information we collect, use or under legal obligation may disclose. Examples of personal information that may fall under the policy include, but are not limited to:

- ▶ name, home address, personal telephone numbers, and e-mail addresses;
- ▶ Social Insurance Number, gender, date of birth, driver's licence number or other photo-identification;
- ▶ family member information (i.e., beneficiary designation);
- ▶ medical information;
- ▶ emergency contact names, addresses and telephone numbers;
- ▶ pension information; and
- ▶ banking information.

This personal information may be collected when:

- ▶ you are hired;
- ▶ you sign a contract; or
- ▶ you apply for employment.

Should you have any questions or concerns, please contact the Vice President of Finance.

THE CODE OF BUSINESS CONDUCT:

At **Castle Building Centres Group Ltd.**, we are committed to maintaining a professional work environment of the highest quality and integrity by providing a Code of Business Conduct for our employees.

The Code of Business Conduct applies to all our employees.

- ▶ It is your responsibility to conduct business in such a manner as to inspire public confidence through fair and honourable dealings. All dealings with the public must be without any form of prejudice or favouritism.
- ▶ The Code of Business Conduct governs individuals acting in their capacity as employees of the Company. As our valued employees, you are expected to conduct yourselves with integrity and to avoid any act that could embarrass, or otherwise harm, the reputation of the Company.

GUIDELINES - ETHICS:

As employees of **Castle Building Centres Group Ltd.** or buying agents representing our Company, you are expected to abide by the following guidelines, as well as the general principles outlined in the Code of Business Conduct.

- ▶ You shall consider first the interests of the Company in all transactions and carry out and believe in its established policies.
- ▶ You shall not use your authority or office for personal gain.
- ▶ You shall buy without prejudice, seeking to obtain the maximum value for each dollar of expenditure.
- ▶ You shall subscribe to, and work for, honesty in buying and selling and refuse to take part in all forms of improper business practices.
- ▶ You must comply with all legal requirements of any jurisdiction in which we do business and with all contractual obligations.

BREACH OF THE BUSINESS CODE:

Full compliance with this policy is expected of all employees. If you become aware of, or suspect, a contravention of the Code of Business Conduct you must report the facts promptly to your Supervisor or the Vice President of Finance. All reports will be kept confidential except to the extent necessary for appropriate review and action.

- ▶ Breaches of the Code will be dealt with promptly after an investigation has been undertaken. The investigation will include an opportunity for the employee who has allegedly breached a term of the Code to explain their position.

- ▶ In the event that, after an investigation, it has been determined that a breach of the Code has occurred, a decision will be made as to what appropriate discipline will be imposed. Such discipline could include progressive discipline up to and including termination of employment.
- ▶ If you are concerned that some action that you are about to take may breach the Code speak to your immediate Manager and obtain an opinion in writing as to whether such action would or would not constitute a breach.
- ▶ Be vigilant, act promptly and you will probably avoid any possible conflict with the Code.

CONFLICT OF INTEREST:

As employees of **Castle Building Centres Group Ltd.**, you are expected to be independent with respect to your actions, decisions and judgements respecting all Company business. As such, you are expected to have no relationship, no activities and no personal financial interests that might possibly impair or affect your judgement or influence your decisions concerning Company business.

- ▶ Company information concerning financial matters, prospects, and business ventures is to be treated as confidential and you are not to disclose it to anyone other than those who are authorized to have the information to carry out their responsibilities.
- ▶ You are expected to comply with all governing legislation relating to such matters as bribes, secret commissions and political contributions.

DEALING WITH RELATIVES OR FRIENDS ON COMPANY BUSINESS:

We do not prohibit transactions with family members or friends provided that such transactions do not convey a direct or indirect benefit at the expense of **Castle Building Centres Group Ltd.**

- ▶ If you have a financial, family or personal interest in a vendor, member or competitor, you are expected to disclose such interest to Management.
- ▶ If you believe that you may have a conflict in the discharge of your employment duties, you should bring the matter to the immediate attention of Management.

EMPLOYMENT OF FAMILY MEMBERS AND RELATIVES:

In order to maintain corporate integrity, we have established the following guidelines on the issue of employment of relatives.

- ▶ For the purposes of this policy, a relative is any person who is related to you by blood or marriage, or whose relationship with you is similar to that of persons who are related by blood or marriage.
- ▶ We do not have a policy against hiring relatives or family members. However, one stipulation has been established to ensure fair treatment of all our employees.
 - ▶ While we will consider applications for employment from relatives, relatives may not be hired or transferred into positions where they directly or indirectly supervise, or are supervised by, another family member or within any other workflow pattern that could pose a threat to internal confidentiality and/or security.
 - ▶ Exceptions may be considered under extenuating circumstances by the President.

- ▶ Individuals who are being considered for a position at **Castle Building Centres Group Ltd.** are required to identify any **Castle Building Centres Group Ltd.** employee who is a family member and/or individuals with whom they have an intimate personal relationship. This identification shall be made before and/or during the application process, in confidence, to the hiring Manager or the Vice President of Finance.
- ▶ You are required to notify your Manager within five (5) days of any condition that could require reassignment. Failure to do so will result in progressive discipline up to and including termination.
- ▶ In cases where a conflict, or the potential for conflict of interest, arises during the course of your employment with **Castle Building Centres Group Ltd.**, even if there is no reporting relationship involved, the parties may be separated by reassignment at the discretion of Management.
- ▶ If the relative relationship is established after employment, your Manager will have 10 days to decide who is to be transferred or reassigned. If not, the Manager will decide.
- ▶ **Existing relative relationships prior to September 1, 2011, will not be affected by this policy.**

OUTSIDE BUSINESS ACTIVITIES AND OTHER INTERESTS:

As an employee of **Castle Building Centres Group Ltd.**, you are expected to commit your full-time attention to your work responsibilities.

- ▶ You may not accept or maintain employment or make or maintain business interests in entities who compete with us.
- ▶ If outside activities adversely affect your employment or performance at **Castle Building Centres Group Ltd.**, your employment with our Company may be terminated.
- ▶ Employees who are considering pursuing any type of external part-time employment or other activities such as outside business interests, freelance work, directorships, etc. which may adversely affect their employment with **Castle Building Centres Group Ltd.** are required to obtain the permission of their Manager before entering into such arrangements. New employees who are already involved in such activities are required to disclose those interests to the hiring manager *before* beginning employment with the Company.

CONFIDENTIAL INFORMATION:

Castle Building Centres Group Ltd. is committed to the protection of resources that are unique to our Company. Keeping such information from our competitors is part of the reason for our success. This includes both business and personal employee information.

- ▶ We will hold all employee information in the strictest confidence and information resources will be restricted to authorized employees only.
- ▶ We protect proprietary information by restricting visitor access to certain designated Company areas. These areas will only be available to those who have business there.
- ▶ As an employee, you cannot disclose, or allow to be disclosed, any information that is vital to the Company's operation or competitiveness. We ask that you not discuss confidential information in public areas, with family or friends, and to be vigilant in your document management procedures to prevent inadvertent disclosure (i.e., safeguard information in inboxes, computer screens, supplier and member invoices, etc.). Safeguards are established to ensure the integrity and protection of Company information.
- ▶ If you become aware of any disclosure of sensitive information, report it immediately to your Manager.

NON-COMPETITIVE/NON-SOLICITATION AGREEMENTS:

In order to protect **Castle Building Centres Group Ltd.** business, guidelines have been established around Non-Competition and Non-Solicitation Agreements.

- ▶ Protecting information of a proprietary interest is extremely important to **Castle Building Centres Group Ltd.** Such information includes, but is not limited to: member lists; intellectual property such as trademarks, goodwill and trade secrets; marketing and pricing strategies; and special or insider knowledge of how our business is managed or conducted. As such, we may require you to sign a Non-Competition and/or a Non-Solicitation Agreement when you are hired.
- ▶ All applicants being considered for employment must disclose any contract, employment agreement or non-competition / non-solicitation agreement with a previous employer. If any part of the agreement is still in force, a copy must be sent to legal counsel for review prior to any offer of employment being made.

Effective October 25, 2021, new provisions under the Ontario *Employment Standards Act, 2000* prohibit employees from entering into new non-competition agreements, except executives as defined in the *Act*. This prohibition does not affect agreements entered into prior to that date.

PROTECTING INTELLECTUAL PROPERTY AND USE OF COPYRIGHTED MATERIALS:

Castle Building Centres Group Ltd. recognizes the importance of ensuring that all intellectual property is protected and that the rights of other companies must be protected as well.

- ▶ Any intellectual property that you create in the performance of your job responsibilities belongs to our Company and should always be adequately protected.
- ▶ You are required to execute applications, assignments or other instruments upon our request for applications for, and the attainment of, patents or to otherwise protect our interests.
- ▶ Any unauthorized use of our copyrights, patents, trademarks, service marks or other intellectual property must be reported to the Manager immediately.
- ▶ Always get written permission before using a third party's copyrights, patents, trademarks, service marks or other intellectual property.
- ▶ Do not make copies of copyrighted material (including software) unless permission (in writing) has been obtained by Management.
- ▶ Ensure that copyright notices are on all **Castle Building Centres Group Ltd.** materials, information, products, services and other documents or products intended for public distribution or circulation.

IMPROPER USES OF CONFIDENTIAL INFORMATION:

We expect our employees to act with discretion and integrity when dealing with confidential information.

- ▶ Business, commercial or competitive information coming to your attention in connection with your duties at **Castle Building Centres Group Ltd.** is provided for the use of our Company and:
 - ▶ must be kept confidential;
 - ▶ must not be disclosed to any third parties; and
 - ▶ must not be used for any purpose or in any manner for the personal gains of any employee who obtains or receives the information.

- ▶ Similarly, if we are considering making an investment in an entity, you are prohibited from using or releasing this information to others who may benefit from the knowledge.

DISCLOSURE:

Castle Building Centres Group Ltd. trusts that you will act with integrity, honesty and in accordance with all policies.

- ▶ If you are aware or become aware of any breach, or possible breach of these policies, you are expected to promptly and fully disclose the particulars of same to the appropriate officials (an Executive of **Castle Building Centres Group Ltd.**).

COMPUTER SOFTWARE POLICY:

In order to protect our Company from (1) any legal actions that may arise from the wrongful use of illegal software; (2) copyright infringement (making more than one copy); (3) the risk of computer viruses damaging our data; or (4) the negative publicity of a lawsuit, only legally purchased software may be copied or downloaded onto a hard disk or to the Local Area Network (LAN).

- ▶ Immediately, upon cessation of employment for any reason, all information belonging to **Castle Building Centres Group Ltd.**, whether stored electronically or in document format, must be returned to the Company.

PERSONAL COMPUTER (PC) SOFTWARE POLICY:

- ▶ At **Castle Building Centres Group Ltd.**, we do not allow the use of unauthorized software on our computer equipment or to copy software licensed to our Company for personal use. The use of unauthorized software is an infringement of copyright under the federal *Copyright Act* and may constitute a criminal offence under certain circumstances.
- ▶ In addition to exposing yourself and our Company to penalties, the use of unauthorized software increases the risk of introducing viruses to our systems and interfere with the operation of authorized software.
- ▶ Because of these issues, if you are found using any unauthorized software on Company equipment or copying software licensed to the Company for personal use, you will be subject to progressive discipline, up to and including termination.

LAPTOP SOFTWARE POLICY:

- ▶ At **Castle Building Centres Group Ltd.**, we are responsible for installing only Company hardware or software on employee-owned laptops.
- ▶ You will be held responsible for any damage to hardware or software caused by the installation or use of non-approved hardware or software on your business laptop.
- ▶ We are not responsible for installing or maintaining your personal hardware or software.

USE OF COMPUTERS:

At **Castle Building Centres Group Ltd.**, we are firmly committed to ensuring that our computer resources are purchased, maintained and protected in full compliance with all governing legislation.

- ▶ The increasing threats of copyright infringement, computer viruses and the risk of legal action as a result of using illegal software have made this policy a priority. We are committed to only installing software that has a valid registered license and is pre-approved for installation on your computer by the Company's Information Technology Manager.
- ▶ You may not download any software or other programs without prior authorization from your Manager and/or the Information Technology Manager.
- ▶ Many jurisdictions have enacted legislation that requires any person who has reasonable and probable grounds to believe that a representation or material is child pornography to report the matter to the police. **Castle Building Centres Group Ltd.** expects all employees to report incidents of child pornography to the proper authorities.

CARE OF EQUIPMENT:

The Company provides the necessary equipment, for the use by its employees, including desktop computers, laptop computer, phones, projectors and other electronic devices. It is expected of the employee to take reasonable care to protect the value and function of these company assets.

- ▶ Equipment must not be left in the cabin of a vehicle but instead either kept with the person or secured in the locked trunk of the vehicle.
- ▶ Portable equipment must be transported in a suitable case.
- ▶ Equipment must not be left in the care of outside parties other than approved repair facilities.
- ▶ Computers that have reached end-of-life must have all company data and licensed programs erased before disposal.
- ▶ Chemical cleaning agents should not be used on the screens, casing or keyboards of computers.
- ▶ Do not disassemble equipment unless authorized by the Information Technology Manager.

PASSWORDS:

Employees must use passwords to protect against unauthorized access to their files. Normally this can be achieved by using a password when you sign on to the computer.

- ▶ Any particularly sensitive data or correspondence should also be individually password protected.
- ▶ Employees are responsible for the security of their passwords.

Choose a password that would not be obvious to others and use it consistently.

Please note that all correspondence, design, data, programs, etc. that an employee creates in the performance of his job at **Castle Building Centres Group Ltd.** is the property of **Castle Building Centres Group Ltd.** The Corporation has the right to access these files at any time and the employee, whether still in the employ of the corporation, can not limit the Company's access to these files whether through the use of passwords or by the wanton destruction of these files.

BACK-UPS:

- ▶ The MIS department performs a daily back up of all information on the LAN servers.
- ▶ It is their responsibility to ensure these back-ups are accurate and complete.
- ▶ Any data stored by employees on their hard drives, floppy drives, laptops or CD's will not be backed up by MIS.
- ▶ Each individual employee is responsible for ensuring these items are appropriately backed up.

INTERNET ACCESS POLICY:

At **Castle Building Centres Group Ltd.**, we recognize the convenience and usefulness of the Internet as an integral information source. However, care and caution must be exercised in order to prevent disturbances to your co-workers. At all times, any policies and/or guidelines restricting the use of the Internet (e.g., prohibited sites), **MUST** be respected and adhered to.

The Company maintains a website on the Internet at the following URL:

www.castle.ca

- ▶ Any connection between the Company and the Internet presents the opportunity for unauthorized access to our internal information systems. It is extremely important that such a connection is secure, controlled and monitored.

SENSITIVE AND/OR CONFIDENTIAL INFORMATION:

The confidentiality of our communications, including e-mail and file transfers, transmitted over internal and external networks is very important. Employees are expected to use care when communicating and when selecting and sending to the appropriate recipient.

APPROVED USES:

You may utilize the Internet for Company business activities or for the purpose of the following Management-approved activities unless such activities violate any other provision of our Internet policy:

- ▶ research;
- ▶ individual professional development;
- ▶ education;
- ▶ community and economic development;
- ▶ charitable activities;
- ▶ public service;
- ▶ local, provincial or national government affairs; and
- ▶ online personal banking transactions, etc.

The following rules and procedures must apply:

- ▶ Our employees who have access to the Internet and networks must use the Company-authorized access method. All access methods must be authorized and approved by the Information Technology Manager.

- ▶ Any use of Internet services beyond electronic mail must have Management approval (i.e., FTP, instant messaging, proprietary applications).
- ▶ All software downloaded to computers must:
 - ▶ be used for Management-approved business activities;
 - ▶ comply with all copyright and licensing agreements; and
 - ▶ be scanned for computer viruses or other malicious code prior to use.
- ▶ Any information about products or projects, such as information related to advertising, promotions, technical assistance, research interests or medical communications distributed through the Internet, etc. must adhere to the same approvals as for print and other forms of communications.

PERSONAL USE:

We do not prohibit our employees from accessing the Internet for personal reasons; however, the following rules and procedures must apply:

- ▶ Resources (time, disk space, paper, etc.) associated with personal communication must be negligible. In particular, such use must not interfere with your work responsibilities or required business communications.

Never...

- ▶ forward any e-mail chain letters;
- ▶ send sensitive information by e-mail or over the Internet, especially without proper encryption and/or password protection;
- ▶ download and/or receive files from the Internet without performing a virus scan;
- ▶ use information from the Internet for any purposes which may violate any applicable laws or regulations;
- ▶ use such information for personal profit or benefit; or
- ▶ post personal comments that may be perceived to be the opinion of the Company. Any posts about the Company must be approved by Management.

SOCIAL MEDIA USE POLICY:

Castle Building Centres Group Ltd. allows for limited, occasional use of online social media sites by our employees while at work, subject to certain restrictions. We recognize that these tools allow employees to stay in touch with colleagues, friends and family members, and that at times, participation in such forums can be effective business tools, resulting in increased opportunities to market our Company's products/services, promote **Castle Building Centres Group Ltd.** as an employer of choice and improve communication among employees.

Online social media sites or social networking services includes current and emerging sites such as Facebook, X (formerly known as Twitter), Instagram, LinkedIn, etc., as well as video-sharing sites such as YouTube. While we do not ban the use of social media sites at work, the following restrictions apply:

- ▶ Your social media activities must never be allowed to interfere with your duties as an employee of **Castle Building Centres Group Ltd.** For this reason, you are asked to confine such activities to lunches and breaks wherever possible. **(The Company reserves the right to randomly monitor the system. Under certain circumstances, misuse of Company Internet access or e-mail systems will give rise to progressive discipline, up to and including termination of employment.)** Excessive use of social media on Company time, as with all personal Internet use, will result in progressive discipline, up to and including termination of employment.
- ▶ You must comply with the policy below on Participation in Online Forums or "Blogs". In particular, posting inappropriate content or confidential information which is in some way related to your work, or which would tend to damage the reputation of **Castle Building Centres Group Ltd.** will not be tolerated, either while at work or on your own time. Again, violation of this policy will give rise to progressive discipline, up to and including termination of employment.
- ▶ As with all Internet use, do not click on any suspicious links or download any software to your computer when using social media sites. Never provide any personal or confidential information while you are online.
- ▶ Additionally, accessing interactive apps on Company hardware and Internet systems potentially creates risks such as phishing e-mails and malware that could expose our systems to data breaches and identity theft.

PARTICIPATION IN ONLINE FORUMS AND BLOGS:

Employees should remember that any messages or information sent on facilities provided by the Company to one or more individuals via an electronic network - for example, web-based mailing lists, bulletin boards and online services - are statements identifiable and attributable to the Company.

- ▶ The Company recognizes that participation in some forums may be important to the performance of an employee's job. For instance, an employee may find the answer to a technical problem by consulting members of a news group devoted to the technical area in question.
- ▶ Employees should include the following disclaimer in all their postings to public forums: "The views, opinions, and judgements expressed in this message are solely those of the author. The message contents have not been reviewed or approved by **Castle Building Centres Group Ltd.**"
- ▶ Employees should note that even if disclaimers are used, a connection with the Company still exists and a statement could be imputed legally to the Company. Therefore, employees should not rely on disclaimers as a way of insulating the Company from the comments and opinions they contribute to forums. Instead, employees must limit their discussion to matters of fact and avoid expressing opinions while using the Company's systems or a Company-provided account. Communications must not reveal information about the Company's processes, techniques or trade secrets, or divulge any other confidential information, and must not otherwise violate this or other policies of the Company.
- ▶ In a democracy such as Canada, citizens enjoy a certain amount of freedom of speech. **Castle Building Centres Group Ltd.** recognizes the right of employees to express their own opinions. Web logs ("blogs"), social networking sites and other forums (online and otherwise) provide individuals with a vehicle to express their thoughts and opinions on a wide variety of subjects. The Company understands that some employees will want to post information expressing their thoughts, opinions, beliefs and experiences on such forums. Employees are free to do so, on their own time, using their own resources; however, certain types of inappropriate content can give rise to progressive discipline, up to and including, termination of employment.

- ▶ Inappropriate content that can lead to discipline includes, but is not limited to, the following types of material:
 - ▶ disparaging, damaging or embarrassing comments about the Company, its products/services, employees, business dealings, customers, suppliers or the executive/management team;
 - ▶ confidential or proprietary information related to the Company itself, or its employees, customers or suppliers (including trade secrets, customer lists or intellectual property such as patents, trademarks and copyrights);
 - ▶ material related to any of **Castle Building Centres Group Ltd.'s** employees or group of employees that is hateful, racist, vulgar, insulting or offensive, that results in the bullying or harassment of any of the Company's employees, or otherwise contravenes applicable human rights legislation;
 - ▶ material that is defamatory to the Company, or its employees, executive/management team, members, competitors or suppliers;
 - ▶ material related to the Company that contravenes legislation, such as the *Competition Act*, and legislation prohibiting insider trading or other offences related to the trading of securities; and
 - ▶ any content, in general, that has the effect of bringing the Company into disrepute, or that has the potential to damage **Castle Building Centres Group Ltd.'s** reputation.

WORKING FROM HOME:

Employees, who work from home or at an off-site location, even on an occasional basis, must be particularly vigilant in safeguarding confidential, sensitive or personal information pertaining to the Company, its members and fellow employees. Individual employees who work from home or at any other off-site location are responsible for ensuring the confidentiality of records in all formats. In particular, employees must observe the following procedures when dealing with such information in relation to the security of electronic files:

- ▶ Whenever possible, an employee working from home should dial into **Castle Building Centres Group Ltd.'s** network by using our Virtual Private Network (VPN), as opposed to e-mailing attachments or downloading sensitive or confidential files to a laptop or a removable storage device such as a flash drive.
- ▶ The amount of sensitive or confidential data that is saved on a laptop computer or on a removable storage device must be kept to a minimum, wherever possible. Only information that is relevant and necessary should be stored electronically under such circumstances.
- ▶ Removable storage devices must be kept securely (preferably under lock and key) when not in use. In particular, a flash drive (also known as a "memory stick") is small and easily lost, and is capable of storing vast amounts of data.
- ▶ Private, sensitive or confidential data must never be removed or deleted from the Company's network when such files are being worked on from a remote location. Instead, employees should make copies of these files, so that a backup copy remains saved on **Castle Building Centres Group Ltd.'s** network.
- ▶ If possible, sensitive electronic data containing the names of individuals should be revised so that the files contain only initials, symbols or codes, as opposed to full names.
- ▶ Laptops must be password protected and be locked using a locking cable when in use wherever possible. Never leave laptops or removable storage devices unattended.

- ▶ While working from home, employees must position computer monitors and laptops carefully to ensure privacy. Employees must not leave computers unattended with work displayed on the screen. Screensavers must be password protected, especially during periods of inactivity.
- ▶ Employees must never work on or access sensitive or confidential information at home, or elsewhere, using an unsecure or unencrypted wireless network (also known as "Wi-Fi"). Avoid completing such work at Internet cafés or in other areas with public Wi-Fi.
- ▶ All employees working remotely are required to adhere to **Castle Building Centres Group Ltd.'s Remote Worker Protocols** on page 120.

WORKING WITH CONFIDENTIAL AND/OR SENSITIVE INFORMATION AT HOME:

Castle Building Centres Group Ltd. is committed to the protection of privacy and the confidentiality of member and employee information. Individual employees who work from home or at any other off-site location are responsible for ensuring the confidentiality of records in all formats and must observe the following procedures when dealing with such information in relation to the security of paper files, when working with confidential data that is stored electronically, and the security of telecommunications.

Security of Telecommunications:

- ▶ All cellular phones and electronic devices which are used for business purposes should be password protected.

Security of Paper Files:

- ▶ Files must not be removed from the office unless absolutely necessary. If possible, copies of such files should be made, with the originals remaining on-site. Copies should be clearly identified as such, and must be destroyed when no longer required.
- ▶ Hard copies of confidential or sensitive information which are being destroyed must be placed in shredding boxes in Head Office for proper shredding or destroyed by a shredding unit in a home office. Discarded files must never be disposed of in a public garbage or recycling bin.
- ▶ Whenever possible, only relevant documents should be removed.
- ▶ Any files removed from the office must be signed out and signed back in again when returned to the appropriate filing cabinet. Files must be returned as soon as possible.
- ▶ Any briefcase containing sensitive data which is being transported must never be left unattended (this includes coat checks and baggage checked at airports). If such a briefcase is being transported in a vehicle, wherever possible it must be kept in a locked car trunk and not be stored in a vehicle overnight.

TO ALL USERS:

Castle Building Centres Group Ltd.'s Internet service and/or Company equipment may not be used to connect, transmit, download or upload any graphics, data, audio or video clips that are related to sex, exploitation of minors, illegal drugs, criminal skills and/or activities, hate speech, online gambling or job search activities.

Note:

- ▶ All electronic mail, bulletin board messages, files, as well as any other data stored on or transmitted by Company equipment is the property of the Company.

- ▶ You should be aware that there is no reasonable expectation to privacy in the use of e-mail or the Internet while in the workplace.
- ▶ You are specifically advised that you should have no expectation of privacy for any Internet use via our Company's facilities, whether business or personal.

The Company reserves the right to randomly monitor the system. Under certain circumstances, misuse of Company Internet access or e-mail systems will give rise to progressive discipline, up to and including termination of employment.

FAIR COMPETITION AND ANTITRUST:

We, at **Castle Building Centres Group Ltd.**, compete and deal fairly with our members, suppliers and competitors and comply with all governing antitrust and competition laws.

- ▶ We do not tolerate any agreements or information sharing of any kind with suppliers, competitors or members that have the effect of limiting competition.
- ▶ As our valued employee, you will not unfairly disparage or criticize any competitor products or services.
- ▶ You will only make honest and factual claims about our products, services and business that can be substantiated.
- ▶ You will not attempt to obtain information about our competitors through unlawful or unethical means.
- ▶ Additionally, **Castle Building Centres Group Ltd.** will not engage wage-fixing (i.e., agree to fix, maintain, decrease or control wages or other terms of employment) or non-poaching arrangements (i.e., agreements to not solicit or hire each other's employees) with other employers.

GIFTS FROM BUSINESS CONTACTS:

In order to ensure that business is conducted in a professional and ethical manner, we have established guidelines regarding the receiving and giving of gifts from business contacts.

- ▶ You may accept a gift of moderate cost which is made up of a supplier's or member's own product or is clearly a piece of their advertising such as calendars, golf balls, etc. which bear the imprint of their company's name.
- ▶ You may not accept a gift of substantial value or one that is unrelated to the supplier's or member's product.
- ▶ Advance approval from your Manager is required before you may give a gift of any kind to a member, supplier or vendor representative.

DISCONNECTING FROM WORK:

At **Castle Building Centres Group Ltd.**, we have always believed that employees should strive for greater work/life *integration*, meaning they should attempt to manage their work and personal lives in ways that benefit both areas. This allows for better management of work and personal responsibilities, flexibility and opportunities for compromise. While we understand that employees may wish to complete work according to their own schedules at times – and we understand that catching up on work can bring a certain peace of mind – everyone needs time away from work and adequate rest and relaxation without having to think about work (other than perhaps in emergencies of a short-term nature).

- ▶ Ontario's *Employment Standards Act, 2000* was recently amended to require employers with 25 or more employees to develop a written policy with respect to disconnecting from work.
“DISCONNECTING FROM WORK” means not engaging in work-related communications, including e-mails, telephone calls, video calls or the sending or reviewing of other messages, so as to be free from the performance of work.
- ▶ We encourage and require all employees, including management, executives, professionals, etc., to set aside sufficient time away from work for their own health, safety and wellness.
- ▶ While **Castle Building Centres Group Ltd.’s** Disconnecting from Work policy applies to all employees, some groups of employees or individuals are required to be available outside of your standard or core hours of work to maintain operational and/or member functionality or to deal with emergency situations due to the nature of their position, such as Managers, technical support, etc. In this situation, **Castle Building Centres Group Ltd.** will advise you of the requirement and the urgency related to it and strive to keep communications outside your regular working hours to a minimum.
- ▶ Other than in emergencies or critical situations, the Company will not discipline or otherwise engage in any reprisals against an employee who wishes to disconnect from work outside their normal or scheduled hours of work.
- ▶ As an organization, we ask that you comply with **Castle Building Centres Group Ltd.’s** company policy, best practices, and legal obligations.

For example, refrain from checking for, drafting, sending and responding to work-related e-mails, instant messages and voicemail after hours, on weekends, during vacations, on company/statutory holidays, unless required to do so by nature of your position.

Castle Building Centres Group Ltd.’s *Disconnecting from Work* policy is effective June 2, 2022 .
Should you have any questions or concerns, please contact the Vice President of Finance.

ELECTRONIC MONITORING:

At **Castle Building Centres Group Ltd.**, we take employee privacy very seriously. As an organization, we have a philosophy of not unduly restricting the freedom of our employees through monitoring or surveillance, either electronic or otherwise. In part, this is because we trust our employees to do the right thing and we focus on results rather than the day-to-day monitoring of our employees. For those reasons, we will always treat private employee information with the utmost care and respect. We maintain stringent safeguards to ensure your personal information is kept safe and secure so it does not fall into the wrong hands. It is our policy to collect and store personal information only when absolutely necessary, and we ensure the information is used only for the purposes for which it was gathered and we provide such information to third parties only with consent or where necessary under a recognized legal or regulatory requirement.

Nevertheless, it is important to understand that employee privacy rights are limited in scope, particularly when it comes to the use of systems and devices owned by the company. As an organization, we reserve the right to monitor our employees’ online and other activities to ensure our systems aren’t being compromised or exposed or used for illegal or unethical purposes. We also ensure our employees are making appropriate use of their time during work hours and are not divulging sensitive or confidential information to third parties. This applies with respect to **Castle Building Centres Group Ltd.** employees and includes activities undertaken in the office as well as those working remotely, off-site or in a hybrid environment.

According to the Ontario Government, electronic monitoring includes “all forms of employee and assignment employee monitoring that is done electronically.” This includes, but is not limited to, situations where an employer uses global positioning systems (GPS) to track employee whereabouts, sensors to track how quickly an employee scans items on a cash register or tracks the websites an employee visits using their work computers.

At **Castle Building Centres Group Ltd.**, the types of electronic monitoring we engage in include the following:

- ▶ Using software to occasionally monitor e-mail messages and/or “red flag” certain messages.
- ▶ Using blocking software to restrict employees from visiting certain websites or accessing certain content (e.g., relating to pornography, hate groups, gambling or illegal activity).
- ▶ Using time and attendance software to track employees’ hours and time off.
- ▶ Monitoring employees’ mobile data usage using company smartphones.
- ▶ Tracking usage data on company-provided systems.

As an organization, **Castle Building Centres Group Ltd.** will at times engage in electronic monitoring of our employees using the above tools and technologies. This is done for the following reasons:

- ▶ To protect the company from potential cybersecurity risks and threats.
- ▶ For quality control and training purposes.
- ▶ For performance management and disciplinary purposes.
- ▶ For cost containment purposes and for the reporting of legitimate business expenses.
- ▶ As part of workplace investigations into alleged misconduct.
- ▶ To ensure employees aren’t using company systems to access or create pornographic, hateful, defamatory or other inappropriate content.
- ▶ To ensure confidential or sensitive information isn’t being transferred inappropriately via e-mail or online file transfer.

This policy applies to all **Castle Building Centres Group Ltd.** employees, including those on a fixed-term employment contract and assignment employees (for example, those working for **Castle Building Centres Group Ltd.** through a temporary help agency).

This policy was first prepared on October 11, 2022. It applies to all **Castle Building Centres Group Ltd.** employees, onsite contractors, managers and executives in Ontario.

For further information, please contact the Vice President of Finance.

MODERN SLAVERY:

Castle Building Centres Group Ltd. is committed to promoting and upholding moral and ethical business practices, including the prohibition of modern slavery; such as forced labour and child labour, in our business activities and in our supply chain.

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* defines the following:

“CHILD LABOUR” means labour or services provided or offered to be provided by persons under the age of 18 years and that (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

“FORCED LABOUR” means labour or service provided or offered to be provided by a person under circumstances that (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

- ▶ In Canada, the minimum age of work for a work place is generally defined under the governing occupational health and safety legislation and/or governing employment standards legislation. For example, Ontario's *Occupational Health and Safety Act*, R.R.O. 1990, Regulation 851- Industrial Establishments, sets the minimum age of a worker or a person who is permitted to be in or about an industrial establishment.
- ▶ **Castle Building Centres Group Ltd.** abides the rules and regulations established under governing legislation regarding the employment of individuals and the minimum age of work.

Section 3

FAIR EMPLOYMENT POLICIES

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

JOB DESCRIPTIONS:

At **Castle Building Centres Group Ltd.**, it is our policy to have a job description for all positions.

- ▶ Job descriptions improve understanding of the position by outlining key responsibilities and requirements.
- ▶ Job descriptions also allow your Manager to understand and evaluate what you do fairly and objectively.
- ▶ The standards and objectives established for the job as well as the performance appraisals and professional development sessions are based on the job description.
- ▶ Job descriptions are reviewed periodically by Senior Management to ensure that they remain accurate.

Should you have any questions or concerns, please contact your Manager.

JOB POSTINGS:

At **Castle Building Centres Group Ltd.**, our job posting policy provides a fair and consistent method of filling vacant jobs through the promotion and transfer of qualified internal candidates, whenever possible.

- ▶ You are encouraged to read the postings carefully and apply for any job in which you are interested.
- ▶ Selection is on the basis of skills, ability, past performance and, if all other factors are considered equal, years of service.
- ▶ If suitable internal candidates are not available, we will look to outside sources and we may conduct an external search concurrently.
- ▶ Should you have any questions or concerns, please contact your Manager.

EMPLOYMENT APPLICATIONS:

At **Castle Building Centres Group Ltd.**, we rely on the accuracy of information contained in your employment application as well as the accuracy of other data presented throughout the hiring process and during the course of your employment with our Company.

- ▶ Any misrepresentation, falsification or material omission of information presented throughout the hiring process and during the course of your employment with our Company will result in progressive discipline up to, and including, termination.

EMPLOYMENT REFERENCE CHECKS:

In order to protect our Company and our employees, reference and/or other checks are required for all potential new employees prior to being hired at **Castle Building Centres Group Ltd.**

The collection, use and disclosure of your personal information by the Company will be protected by and dealt with in accordance with the relevant privacy legislation.

- ▶ To ensure that individuals who join us are well qualified and have a strong potential to be productive and successful, it is standard policy to check the employment references of all applicants who are being considered for a position.
- ▶ Reference guidelines are as follows:
 - ▶ at least two (2) professional references;
 - ▶ no character references will be accepted;
 - ▶ references are limited to persons who are able to provide information related to the applicant's:
 - ▶ work experience;
 - ▶ educational qualifications;
 - ▶ training; and
 - ▶ on the job performance.
 - ▶ no references that may inadvertently provide information on a protected freedom (i.e., a priest, rabbi or imam may indicate religion of applicant); and
 - ▶ at least one (1) reference(s) must be a former/current Manager.
- ▶ Depending on the nature of the position, other checks may be required (e.g., criminal background check, verification of education credentials, credit check, driver's abstract, etc.).
- ▶ Any references and/or other checks will only be requested after a conditional offer of employment has been made and, if required, written consent will be obtained.
- ▶ Failure to provide the required information may result in exclusion from further consideration for employment.

PROMOTIONS:

At **Castle Building Centres Group Ltd.**, we believe in the strength of our people and, whenever possible, will promote from within. Internal candidates will be given first consideration when openings occur whenever possible.

- ▶ A promotion means giving broader service and commitment to our Company by increasing the level and scope of your contribution.

LENGTH OF SERVICE AND SENIORITY:

At **Castle Building Centres Group Ltd.**, we greatly appreciate when our employees stay with us and get to know our business very well.

- ▶ When decisions such as who is to be promoted, transferred, laid off or recalled are to be made, an employee's length of service and seniority will be considered. However, it must be understood that we do not base important decisions on length of service or seniority alone. In most cases, an employee must first demonstrate certain abilities or qualifications necessary to do the job. In all cases, the governing employment legislation will apply.

Should you have any questions or concerns, please contact your Manager.

MODIFIED DUTY:

The medical community advises that the rehabilitation of an employee after an injury or disability may, in many instances, be improved if the employee can return to modified duties. As well, in accordance with our Fair Employment Policies section of this employee handbook, we will not discriminate on the basis of disability.

Where an employee is injured or disabled, to assist in the rehabilitation process, **Castle Building Centres Group Ltd.** will attempt to find compatible modified duties.

In the attempt to find suitable modified work, the following procedures will apply:

- ▶ Your health care professional must provide a written description of the applicable restrictions on returning to work.
- ▶ At its discretion, the Company may provide the treating health care professional with a description of the position and/or a physical demands analysis.
- ▶ With your consent, your health care professional may prefer to contact the Vice President of Finance to discuss the modified duty by telephone.
- ▶ Upon receipt of your health care professional's report, the Vice President of Finance will consult with your Manager about modifying your pre-injury job if you are able to perform the essential duties or discuss the availability of appropriate modified duties.
- ▶ If you are assigned to modified duties and aggravate the injury or disability from which you are recovering, it is your responsibility to notify and discuss your concerns with the Manager who assigned you this work.
- ▶ The Manager will consult with the Vice President of Finance in these cases. If an agreement cannot be reached, the Vice President of Finance will contact your health care professional to discuss the suitability of the duties.
- ▶ If appropriate modified duties cannot be found and if applicable, you will be placed on Workers' Compensation Benefits or Disability Insurance as determined by the Workplace Safety & Insurance Board regulations and **Castle Building Centres Group Ltd.** policies.
- ▶ If, as a result of injury or disability, you are unable to perform your normal duties and have not sought medical attention for the problem or have not obtained a report from your health care professional, you should advise your Manager of the problem. The Manager may try to find you modified duties after you obtain a medical report.
- ▶ If no modified work is available, you will be requested to go home on personal leave as determined by the Company policy on attendance.

- ▶ In no case will an employee on modified duties be assigned to work which would displace another full time employee, unless that employee agrees to it.
- ▶ An employee on modified duties may displace a temporary employee, if the work is suitable.
- ▶ Insofar as it is difficult to foresee all possible situations, the right is reserved to deviate from these procedures where obvious inequities would occur.

EARLY AND SAFE RETURN TO WORK (ESRTW):

Castle Building Centres Group Ltd. has established an Early and Safe Return to Work (ESRTW) program which will be applied to all employees on benefits due to a workplace related illness or injury and, whenever feasible, for employees on sick leave due to a non-workplace related illness or injury.

Goals

- 1) Foster and enhance the physical and psychological recovery process for the injured employee
- 2) Reduce medical, disability and lost time costs
- 3) Reduce indirect accident costs
- 4) Minimize the chance of re-injury
- 5) Encourage cooperation between employees and Management
- 6) Establish a more stable workforce
- 7) Enhance the injured employee's sense of confidence and well-being

Definitions:

Suitable work: Post-injury work that is safe, productive and consistent with an employee's functional abilities, and that, when possible, restores the employee's pre-injury earnings.

Productive work: Work that an employee has, or is able to acquire, the necessary skills to perform, and whose tasks provide an objective benefit to the employer's business.

Why Have an ESRTW Program?

- ▶ After accident prevention, an Early and Safe Return to Work program is a Manager's best tool to control benefit costs and reduce losses. The key word is **EARLY**. Your response at the time you learn of the illness or injury has a profound impact on the outcome of most cases. ESRTW actions should start as soon as possible however, because specific illnesses or injuries may need differing amounts of time for healing, the time limits on ESRTW should also be flexible and based on the medical judgment of the treating physician.

Facts You Should Know About ESRTW:

- ▶ it enhances both psychological and physical recovery;
- ▶ injured employees off work longer than six (6) months have only a 50% chance of ever returning to their job; if time lost exceeds one (1) year, their chances decrease to less than 10%;
- ▶ compensable injuries can take up to four (4) times longer for recovery; they may cost five (5) times more than non-compensable injuries;
- ▶ it enables the employee to continue a productive life;

- ▶ it reduces costs of replacing the employee, overtime costs, retraining costs, loss of production and related costs and improves workplace morale;
- ▶ it reduces medical costs - the injured employee heals more rapidly, shortening the time medical treatment is needed;
- ▶ it reduces award costs - the potential for an employee to become totally and permanently disabled is greatly decreased;
- ▶ it reduces legal costs - employees are less likely to feel their rights have been violated causing them to engage a lawyer; and
- ▶ cost reductions will have a direct impact on the benefit premium rate.

Accommodation:

- ▶ It may become apparent, while attempting to identify and secure suitable work, that accommodation may be required.
- ▶ **Castle Building Centres Group Ltd.** will comply with all relevant legislation in determining solutions that will make the accommodation process a success.
- ▶ Accommodations may involve any modification, assistive device, or combination of the two, with the goal of making the essential duties of the pre-injury or alternative employment consistent with the worker's functional abilities.

Workplace Modifications:

- ▶ Workplace modifications are changes or adaptations made to the work area, job tasks, or equipment used to perform the job duties.

Assistive Devices:

- ▶ Assistive devices are prosthetic aids/attachments or appliances specifically designed for, and required by, the worker to perform the job duties.

Who is Responsible?

Responsibilities are assigned to you (the injured employee), your immediate Manager and **Castle Building Centres Group Ltd.**

▶ *You Will:*

- ▶ report any injury right away to your Manager;
- ▶ complete all needed paperwork as soon as possible;
- ▶ follow **Castle Building Centres Group Ltd.** rules and practices;
- ▶ maintain contact with **Castle Building Centres Group Ltd.**;
- ▶ provide regular updates on health condition, treatment and medical status to our designee (e.g., Manager, Vice President of Finance, etc.) at least weekly;
- ▶ return to modified duties which are within medical restrictions (if any) as set by your physician, as part of a rehabilitation program;
- ▶ provide information on functional abilities when requested;
- ▶ identify potential work opportunities;
- ▶ identify potential accommodation strategies; and

- ▶ report any difficulties in the ESRTW process to your Manager.
- ▶ ***Your Vice President of Finance Will:***
 - ▶ conduct an investigation and correct any hazard;
 - ▶ complete all needed paperwork as soon as possible;
 - ▶ submit all supplementary paperwork to be completed by the physician, if you will be seeking medical attention, and return to **Castle Building Centres Group Ltd.** as soon as possible;
 - ▶ inform you of **Castle Building Centres Group Ltd.** work rules and practices;
 - ▶ maintain contact with you and the Vice President of Finance for any work restrictions;
 - ▶ when feasible or appropriate, find or develop modified work for you, within restrictions;
 - ▶ monitor recovery through incoming medical work restrictions and need for modified duty;
 - ▶ identify and offer modified duty assignment; and
 - ▶ identify and discuss possible accommodation solutions.
- ▶ ***Castle Building Centres Group Ltd. Will:***
 - ▶ process claims and forms and submit to the benefit provider for processing and initiating benefits;
 - ▶ inform you and your Manager of your rights and responsibilities under the governing provincial regulations;
 - ▶ maintain documentation and data on claims and trends; and
 - ▶ maintain contact with you, the benefit provider and your physician for any work restrictions.

Notes:

Section 4

EMPLOYEE RIGHTS

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

OUR RESPECTFUL WORKPLACE:

As an employee of **Castle Building Centres Group Ltd.**, you have certain rights and obligations. Above all else, you have the right to be treated with dignity and respect, and to work in an environment that promotes the health, safety and well-being of all employees. This means you have both rights and obligations towards your fellow employees and other stakeholders.

Therefore, behaviour amounting to violence or harassment will not be tolerated by **Castle Building Centres Group Ltd.** Workplace violence or harassment includes any conduct or comment which causes humiliation or embarrassment to our employees because of their sex, sexual orientation, gender, gender identity, gender expression, pregnancy, civil status, racial or ethnic background, colour, ancestry, social condition, political convictions, language, any other prohibited ground of discrimination, or any other reasons.

The following policies are meant to provide a brief overview of the Company's comprehensive workplace violence and harassment policies as posted. For detailed information, please refer to our posted policy or contact your Manager.

VIOLENCE AND HARASSMENT IN THE WORKPLACE:

At **Castle Building Centres Group Ltd.**, nothing is more important to us than the physical and mental health, safety, security, dignity, self-respect and well-being of our employees, managers, contractors, and that of our members and other visitors, including vendors, suppliers and members of the general public. Employees and other internal and external stakeholders have a right to work and conduct their business at **Castle Building Centres Group Ltd.** without fear of violence or anything that would disrupt our safe and respectful workplace and place of business.

- ▶ Violence, intimidation, harassment, sexual harassment and bullying in any form will not be tolerated on **Castle Building Centres Group Ltd.** premises, at any Company event or while conducting Company business, for any reason whatsoever. We acknowledge our responsibility to support and assist persons subject to violence and harassment and that appropriate action will be taken, whether such conduct is perpetrated by an employee, manager, supervisor, contractor, member or a member of the public. You have the responsibility to conduct yourselves accordingly.
- ▶ Preventing violence and harassment in the workplace is everyone's responsibility. Supervisors and managers are expected to take action against acts of violence or harassment even without a complaint, and employees are expected to express their disapproval if they encounter harassing behaviour.

Unless otherwise noted in this policy, references to "employees" also include such individuals as managers, supervisors, executives, contractors, agency employees, and in some cases could also potentially include consultants.

WORKPLACE VIOLENCE:

Workplace violence is defined in the *Occupational Health and Safety Act* as the exercise, or the attempt to exercise, physical force by a person against a worker in a workplace that causes, or could cause, physical injury or a statement or behaviour that is reasonable to interpret as a threat to exercise physical force that could cause injury. **Castle Building Centres Group Ltd.** recognizes that there is a potential for workplace violence to occur. We also acknowledge that physical and emotional harm can often arise out of such acts of violence. No forms of violence will be tolerated in the workplace, on the part of employees, managers, supervisors, contractors, members, suppliers or visitors. Every effort will be made by the Company to identify possible sources of violence and to implement procedures which eliminate or minimize the risks created by such situations.

- ▶ Any acts of violence or threats of violence in the workplace are unacceptable and will give rise to progressive discipline, up to and including termination of employment. The Company is committed to the prevention of workplace violence and to responding appropriately if workplace violence does occur. All managers, employees, supervisors and contractors are responsible for creating and maintaining a safe work environment free from violence, threats and intimidation.

Workplace violence includes, but is not limited to, the following types of conduct:

- ▶ actual and attempted acts of physical violence, including actions such as hitting, punching, slapping or kicking;
 - ▶ threats of physical violence or intimidation;
 - ▶ sexual assault; or
 - ▶ other acts of physical aggression, such as the deliberate destruction of or damage to property, especially where such actions are meant to intimidate one or more individuals.
- ▶ Employees who are victims of violent incidents in the workplace are advised to consult a physician for treatment and/or referral for counselling.

We will not discriminate or retaliate against an employee because the employee has been, or is perceived to be, a victim of workplace violence.

ROBBERY • VIOLENT ACTS • FIGHTING • ILLEGAL ACTS:

At **Castle Building Centres Group Ltd.**, we urge you not to get involved in any actions that may deter a robbery, violent act or other illegal action while on Company property or while conducting business for the Company.

- ▶ If you encounter a situation, be passive. Do not try to stop the robbery, violent act or illegal action. When you and your co-workers are safe, notify your immediate Manager immediately.
- ▶ If a fight breaks out in the workplace, be passive. Do not try to physically intervene. Notify your Manager immediately.
- ▶ **All** illegal actions will be reported immediately to the proper authorities.

This Workplace Violence policy will be reviewed on an annual basis, or more frequently where necessary.

WORKPLACE HARASSMENT:

Ontario's *Occupational Health and Safety Act* defines the following as:

WORKPLACE HARASSMENT: 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 workplace sexual harassment.

WORKPLACE SEXUAL HARASSMENT: 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 the comment or conduct is known or ought reasonably to be known to be unwelcome. It also means the making of 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 work and that person knows or ought reasonably to know that the solicitation or advance is unwelcome.

While **Castle Building Centres Group Ltd.'s** Workplace Harassment Policy is not meant to stop free speech or to interfere with everyday social relations, harassment can be distinguished from normal, mutually acceptable socializing in that it is offensive, insulting, intimidating, hurtful and malicious. It creates an uncomfortable work environment and has no place in employment relationships at our Company.

Guiding Principles:

- ▶ What one person finds offensive, others may not. Generally, harassment is considered to have taken place if the person knew, or ought to have known, that the behaviour is unwelcome.
- ▶ For the purpose of this policy, retaliation against someone for invoking this policy, for participating and co-operating in any investigation under this policy, or for associating with a person who invoked this policy, will be treated as a form of workplace harassment in itself.
- ▶ Our policy applies to all our employees, including Management and contractors, and extends to all Company activities, including lunches and social gatherings (whether on-site or off-site).
- ▶ It is both your responsibility and ours to keep each other informed of matters that infringe upon these rights. These matters must be brought to the attention of your Manager.
- ▶ While harassment is usually based on an ongoing pattern of abuse, in some instances a single incident can be sufficiently serious to constitute harassment.
- ▶ In the interest of being respectful and sensitive towards victims of workplace harassment, confidentiality will be maintained wherever possible. Exceptions will only be made where disclosure is necessary for the purposes of conducting a proper investigation or taking appropriate disciplinary measures, or where required by law or the principles of natural justice.

SEXUAL HARASSMENT:

At **Castle Building Centres Group Ltd.**, we are committed to providing you with a work environment free from sexual harassment. You have the responsibility to conduct yourself accordingly.

- ▶ Like other forms of harassment in the workplace, sexual harassment is against the law. It is also against our policy, which is to encourage respect and courtesy among us all. Also, such conduct creates a negative impact on work performance and creates an intimidating, hostile and/or offensive working environment.

Examples of sexual harassment include, but are not limited to:

- ▶ gender-related comments about an individual's physical attributes, mannerisms or characteristics;
- ▶ unwelcome physical contact such as patting, touching, pinching, petting, etc.;
- ▶ suggestive or offensive remarks;
- ▶ unwelcome propositions of physical intimacy;
- ▶ gender-related verbal abuse, threats or taunting;
- ▶ leering (a side glance expressive of malignity, amorousness or some unworthy feeling);
- ▶ bragging about sexual prowess;
- ▶ demands for dates or sexual favours;
- ▶ offensive jokes or comments of a sexual nature about an employee;
- ▶ display of sexually offensive pictures;
- ▶ unwelcome questions or discussions about sexual activities;
- ▶ sexual assault; and
- ▶ unwelcome language related to gender, gender identity or gender expression.

All employees can be victims of sexual harassment, which can be perpetrated by members of the opposite sex as well as those of the same sex. While incidents of sexual harassment are often characterized by an imbalance of power in the workplace, this is not necessarily always the case, with a harasser's co-worker and even their supervisor or manager sometimes being the victim.

RACIAL AND ETHNIC HARASSMENT:

At **Castle Building Centres Group Ltd.**, we do not condone racial or ethnic harassment. Racial harassment is when someone bothers, threatens or treats another person unfairly because of their race, colour or ancestry. Such forms of harassment can also be connected with one's place of origin, religion, citizenship or first language.

Examples of conduct which may be racial or ethnic harassment include:

- ▶ unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin, colour and place of birth, citizenship or ancestry;
- ▶ displaying racist or derogatory pictures or other offensive material;
- ▶ insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment; or
- ▶ refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

Castle Building Centres Group Ltd. does not tolerate any form of racial or ethnic harassment in our workplace and expects all managers, employees and contractors to help us maintain a workplace free of racial or ethnic harassment.

Failure to do so will give rise to disciplinary actions, up to and including termination of employment.

PSYCHOLOGICAL HARASSMENT (BULLYING):

At **Castle Building Centres Group Ltd.**, we are committed to providing you with a work environment free from psychological harassment.

DEFINITION OF PSYCHOLOGICAL HARASSMENT:

Psychological harassment is behaviour that is repetitive, hostile or unwanted, damaging to a person's dignity and results in a harmful work environment.

Examples of psychological harassment include, but are not limited to:

- ▶ making rude, degrading or offensive remarks;
- ▶ discrediting the person; spreading rumours, ridiculing, humiliating, calling into question their convictions or their private life, shouting abuse, sexually harassing them, or harassing that person based on any ground prohibited by human rights legislation, including race, colour, sex, sexual orientation, gender, gender identity, gender expression, pregnancy, civil status, age, religion, political convictions, language, ethnic or national origin, social condition or disability;
- ▶ belittling the person; forcing them to perform tasks that are belittling or below their skills, simulating professional misconduct;
- ▶ character assassination; spreading rumours, gossip and innuendo, especially that which is malicious, hurtful and untrue;
- ▶ social isolation; ostracizing or ignoring an individual;
- ▶ violence, intimidation or threats of violence;
- ▶ deliberately undermining someone or stopping that person from completing their work;
- ▶ belittling an employee's work or achievements or constantly taking credit for that person's accomplishments; removing responsibilities and accountabilities without reason;
- ▶ constantly changing work requirements and/or standards;
- ▶ assigning unreasonable duties or workload to an employee; assigning demeaning and/or insulting work;
- ▶ establishing impossible deadlines designed to set up an employee for failure;
- ▶ withholding necessary information or deliberately giving false information;
- ▶ making or forwarding offensive jokes, especially when the jokes are directed towards that person or to an identifiable group to which that person belongs;
- ▶ spying on someone, stalking the person, sabotaging or tampering with their equipment or belongings, or otherwise invading that person's privacy;
- ▶ regularly shouting or using profanity, especially when directed towards the individual concerned;
- ▶ constantly or persistently criticizing an individual; regularly criticizing someone in public;
- ▶ unwarranted, unjust or unreasonable punishment; constantly threatening someone with being fired where termination is not warranted;
- ▶ falsely accusing an employee of misconduct, criminal activities or harassment;
- ▶ continuously blocking reasonable requests for training, leaves or transfers; or
- ▶ engaging in online or "cyber" bullying.

Unless an individual has been unfairly singled out for especially harsh treatment, workplace bullying generally does not include situations such as the following:

- ▶ holding people accountable for their performance through the provision of routine coaching and feedback, fair and objective performance appraisals, performance improvement/corrective action plans, or through appropriate and justifiable progressive discipline;
- ▶ providing fair and reasonable constructive feedback or evaluation of the work completed by a colleague or a direct report;
- ▶ a supervisor or manager assigning additional work of a reasonable scope and quantity to their direct reports, or requesting an employee to work reasonable overtime hours when required;
- ▶ minor differences of opinion and/or the occasional workplace conflict which does not get out of hand; and/or
- ▶ occasionally showing slight frustration or annoyance, where such behaviour is justified and displayed in a respectful manner with no threat of violence, intimidation or other inappropriate reprisals.

WHAT TO DO IN CASES OF VIOLENCE OR HARASSMENT:

At **Castle Building Centres Group Ltd.**, we are committed to providing a workplace free from violence and harassment in which everyone can expect to be treated with dignity and respect. Workplace violence and harassment will not be tolerated for any reason; they are serious matters which will give rise to progressive discipline, up to and including termination of employment. This includes violence and harassment both at and away from the actual work site, as long as there is some connection with the work relationship. Instances of workplace violence and harassment include those which occur during business travel, at off-site conferences and training, in the cafeteria and at work-related social gatherings, etc.

In this policy, "complainant" normally refers to the person who is the victim of the alleged violence or harassment, but can also refer to another individual who files a complaint on behalf of the victim, such as a witness or the victim's supervisor, manager or colleague. "Respondent" refers to the person who has allegedly committed acts of violence or harassment. The process described in our program applies to complaints of either violence or harassment, except where otherwise indicated.

All claims of workplace violence and harassment will be investigated and dealt with fairly, promptly and confidentially.

ROLES AND RESPONSIBILITIES:

We all have a role to play in preventing workplace violence and harassment and in dealing with such allegations when they do occur. Some of the specific roles and responsibilities of the relevant stakeholders are detailed below.

Employees and Contractors:

- ▶ to treat everyone in the workplace with dignity and in a manner that is respectful and free of violence, threats, intimidation and harassment;
- ▶ to make changes to their own behaviour where they become aware that there is potential for such behaviour to harm, intimidate, threaten or cause offence to others;
- ▶ to refuse to accept violent or harassing behaviour from others, regardless of whether that behaviour is perpetrated by one's manager or co-workers, or by a member, supplier or member of the public;
- ▶ to intervene and/or report instances of inappropriate behaviour on the part of others which could amount to workplace violence or harassment;
- ▶ to be supportive of others who are victims of workplace violence or harassment; and
- ▶ to cooperate fully with any and all workplace violence and harassment investigations.

Supervisors and Managers:

- ▶ to maintain a workplace free from violence and harassment;
- ▶ to take allegations of violence or harassment seriously and follow-up appropriately;
- ▶ to maintain confidentiality wherever possible;
- ▶ to be familiar with the requirements of the Violence and Harassment in the Workplace policy and all of the relevant sub-policies;
- ▶ to be aware of the signs of workplace violence and harassment and be prepared to intervene when appropriate;
- ▶ to refer victims or perpetrators of violence or harassment to appropriate resources where applicable; and
- ▶ to set a good example and maintain a high standard of conduct in all dealings with others.

Complainants/Victims of Violence or Harassment:

- ▶ in cases of harassment, to clearly inform the harasser that their behaviour is unacceptable and that it must stop immediately;
- ▶ in cases of violence or in other cases where the complainant is not comfortable informing the respondent personally, this may be done by a manager or a Human Resources representative to whom the incident is reported;
- ▶ to preserve evidence and document dates, times and the names of any witnesses, as well as any attempts to resolve the situation; and
- ▶ to cooperate fully with any and all workplace violence or harassment investigations.

Respondents/Employees Accused of Violence or Harassment:

- ▶ to cooperate fully with any and all workplace violence or harassment investigations; and
- ▶ to preserve evidence related to instances of alleged violence or harassment, documenting dates, times and the names of any witnesses.

Human Resources:

- ▶ to educate employees about workplace violence, harassment and domestic violence;
- ▶ to assist managers and employees in investigating allegations of workplace violence and harassment;
- ▶ to inform employees and managers of their rights and responsibilities and of their right to obtain legal advice and/or representation from a qualified lawyer independent from the Company;
- ▶ to mediate workplace disputes involving workplace harassment, where appropriate, to facilitate the finding of a mutually acceptable solution;
- ▶ to assist employees in filing complaints of workplace violence and harassment; and
- ▶ to provide referrals and information about assistance that may be available.

Investigators:

- ▶ To carry out fair and impartial investigations into allegations of workplace violence and harassment. An investigator is a specially trained person who is appointed to investigate a formal complaint of workplace violence or harassment. An investigator would normally be a Human Resources representative or a neutral third party.

Joint Health and Safety Committee / Health and Safety Representative:

- ▶ to be informed where incidents of workplace violence occur which result in personal injury - wherever possible, the identities of the individuals concerned will be protected;
- ▶ to participate in an investigation where there is a work refusal as a result of workplace violence;
- ▶ to obtain the results of workplace violence risk assessments;
- ▶ to provide recommendations and assistance in developing policies, procedures and programs with regard to the prevention of workplace violence and harassment; and
- ▶ to respond to employee concerns related to workplace harassment or bullying.

IF YOU HAVE A COMPLAINT:

By working together, we can resolve any concerns that may arise.

- ▶ The Vice President of Finance is responsible for investigating allegations of workplace violence or harassment at **Castle Building Centres Group Ltd.**

We are committed to the prevention of workplace violence and harassment and to providing an effective and acceptable means for you to report allegations, incidents or complaints. We will work with the Health and Safety Committee to develop and maintain our workplace harassment prevention program.

Employees are encouraged to use the following procedure to report allegations, incidents or complaints of workplace violence or harassment:

- a) Discuss the issue with your Manager unless the issue involves your Manager.
- b) If the issue involves your Manager, take the issue to their superior, to the Vice President of Finance, or to any individual to whom you feel comfortable discussing the matter.
 - ▶ If after using the procedure above, you cannot get satisfactory resolution in a timely manner, take the complaint to either:
 - ▶ Your Manager; or
 - ▶ The President.

- ▶ If the incident or complaint involves an owner or a senior executive of **Castle Building Centres Group Ltd.**, an external person qualified to conduct a workplace harassment investigation will be retained to conduct the investigation.
- ▶ Anyone guilty of violence or harassment will be subject to discipline up to and including termination, with the penalty to be at **Castle Building Centres Group Ltd.'s** discretion. No one shall be disciplined or otherwise penalized for participating in this Complaint Procedure in good faith. However, we take a very dim view of complaints made in bad faith which are untrue, unsubstantiated or of a frivolous, vexatious or vindictive nature.

All claims of workplace violence and harassment will be investigated and dealt with fairly, promptly and confidentially. Confidentiality will be maintained wherever possible unless disclosure is necessary for the purposes of conducting a proper investigation or taking appropriate disciplinary measures, or where required by law.

SERIOUS OR LIFE-THREATENING ILLNESSES:

At **Castle Building Centres Group Ltd.**, our policy is to maintain a safe and healthy environment for all of our employees. If you are diagnosed with a serious or life-threatening illness you are expected to continue to work if you are medically able to perform to our standards and do not create a danger to your own health or to the health and safety of your co-workers.

- ▶ We treat all medical information as confidential and we assure confidentiality.
- ▶ You are under no obligation to discuss your medical information unless the condition is infectious or affects your job performance. If this is the case, you are required to speak to your Manager immediately.
- ▶ Once disclosed we will, in every reasonable manner, support and facilitate your efforts to continue working and will establish:
 - ▶ acceptable performance levels (based on job performance, attendance and job responsibility) that will be mutually agreed upon;
 - ▶ regular reviews to ensure these agreed-upon levels are maintained; and
 - ▶ a procedure where, if there is significant deterioration below these performance levels and/or you are putting yourself or your co-workers in danger, you will be eligible to apply for the appropriate disability benefits.

Any employee who refuses to work with, harasses or discriminates against, a co-worker who has a serious or life-threatening illness will be counselled and educated on the subject. If the employee persists in the refusal, harassment and/or discrimination, that employee will be subject to disciplinary action as in the case of any other performance problem.

No employee will have their job security jeopardized solely because of their illness.

INFECTIOUS ILLNESSES:

Infectious illnesses pose a risk to business, employees in the workplace, their families and the general public. Individual employees may become ill from time to time from common infectious agents which circulate in our communities. Generally, these are self-limited illnesses with little or no implications for co-workers or the business at large. There may be scenarios with wider implications (e.g., pandemic influenza (H1N1), COVID-19 ("Coronavirus"), etc.) for our workers and our business.

Definition:

Illnesses, which may be severe and possibly life threatening, can be transmitted via air, water, environmental surfaces, vector (e.g., mosquitoes) or direct person-to-person contact. These infectious illnesses may threaten to affect a significant portion of the workforce from community exposure (e.g., influenza outbreak) and may be of concern for their potential to spread rapidly in the workplace.

Preventing the spread of infectious illnesses at all times is important to our workplace. This policy applies to all our employees and is designed to minimize and mitigate these adverse effects. An early, consultative, and coordinated response will sustain the wellness of our employees and our business continuity.

- ▶ You are encouraged to control the spread of infection through regular hand washing. Wash your hands with soap and warm water for at least 20 seconds, especially after using the washroom or prior to handling food. Use alcohol-based hand sanitizer where soap and water are not available.
- ▶ You are encouraged to remain at home if you are ill with an infectious illness (you must advise your Manager immediately so that appropriate measures can be taken within your department).
- ▶ You are encouraged to return to work once your health care professional indicates you are well. A signed health care professional's statement to that effect is required, unless prohibited under governing legislation.
- ▶ You are encouraged to wear personal protective equipment (PPE) in the event of a pandemic. Such gear includes masks, face shields, plastic gowns and latex gloves, etc. as required; particularly where physical distancing is difficult or impossible.
- ▶ Violation of this policy may lead to progressive discipline, up to and including termination.

ALCOHOL AND SUBSTANCE USE DISORDER:

It is our desire to provide a safe drug and alcohol-free workplace for our employees at **Castle Building Centres Group Ltd.** To promote this goal, you are required to report to work in an appropriate mental and physical condition to perform your job in a satisfactory manner.

- ▶ Violations of this policy may lead to progressive discipline, up to and including termination of employment. Such violations may also have legal consequences.
- ▶ **While on the premises of Castle Building Centres Group Ltd. and while conducting business related activities off the premises of Castle Building Centres Group Ltd., you may not use, possess, distribute, sell, or be under the influence of alcohol, illegal drugs or other impairment-causing substances. This includes recreational marijuana or any other form of cannabis (including edibles). Employees are cautioned that legalization of marijuana does not mean its use during work hours or immediately prior to a shift will be condoned by Castle Building Centres Group Ltd. We view cannabis intoxication as analogous to being drunk and do not tolerate such impairment while on duty.**

- ▶ **Exception:** If you are participating in a Company function or if you are conducting business in a social environment that is serving alcohol (see The Company and Alcohol policy below) **Castle Building Centres Group Ltd.** expects that you act responsibly.
- ▶ The legal use of legally prescribed medication is permitted on the job only if it does not impair your ability to perform the essential functions of your job effectively and in a safe manner and, does not endanger other individuals in the workplace. Medical marijuana products that are smoked must be consumed only in designated smoking areas or in private, off-site locations. Wherever possible, employees who are prescribed this medication should choose strains or variants that minimize the level of intoxication. Employees in safety-sensitive positions who are prescribed medical marijuana may be reassigned to other duties as part of the accommodation process.
- ▶ Individuals who are prescribed medical marijuana or any other form of medication that is capable of causing impairment are required to disclose this to their Manager and the Vice President of Finance. This is particularly important for those in safety-sensitive positions.
- ▶ Any employee reporting for work and found to be under the influence of alcohol, illegal drugs or any impairment-causing substance will be asked to leave the premises, but, in view of their condition, will be provided transportation in order that they arrive home safely.

THE COMPANY AND ALCOHOL:

Castle Building Centres Group Ltd. insists that you have a designated driver if you have consumed alcohol, over the legal limit, or are under the influence of any impairment-causing substances (including recreational or medical marijuana or any other form of cannabis including edibles) at any Company sponsored event or while you are conducting Company business at any time and/or place (i.e., lunch with member, etc.). **DO NOT DRINK AND DRIVE OR DRIVE HIGH!!**

MARIJUANA IN THE WORKPLACE:

Given the legalization of recreational marijuana, we expect that some of our employees will partake in the consumption of cannabis on their own time. While we do not want to intrude into the private lives of our employees or condemn them for consuming a legal substance when off-duty and away from Company premises, it is important to remember that cannabis is a drug capable of causing intoxication and can lead to health problems and addiction. In a work context, consuming recreational marijuana can have a negative impact on productivity and may result in diminished physical and/or cognitive abilities, impaired judgement and increased risk of workplace accidents. Driving while under the influence of cannabis is also dangerous and illegal. For these reasons, **Castle Building Centres Group Ltd.** employees are strictly forbidden from consuming marijuana or other forms of cannabis on Company property (including in Company vehicles), while on duty, during breaks, at Company-sponsored events (either on or off-site, during or after work hours) or prior to a scheduled work shift.

Employees are advised to remember the following guidelines in relation to the consumption of cannabis:

- ▶ In spite of the fact marijuana is generally consumed by smoking it, consuming cannabis is not like smoking a cigarette. Rather, it is more like drinking alcohol. Therefore, employees are prohibited from smoking or consuming cannabis even in designated smoking areas, during breaks, while on duty or prior to work.
- ▶ Unlike alcohol, cannabis can remain in one's system for a relatively long period of time. This is particularly true of edibles. Employees (particularly those in safety-sensitive positions or roles that require the exercise of care and judgement) are therefore advised to exercise caution when consuming cannabis even after hours on their own time.

- ▶ Like alcohol and illegal drugs, **Castle Building Centres Group Ltd.** does not permit the possession of recreational marijuana on Company premises. This includes the possession of edibles. At no point, should any food or drink items containing cannabis be brought into the workplace or be consumed during or prior to your work shift.
- ▶ Employees who have a valid prescription for medical marijuana and are required to consume their medication during or immediately prior to work hours should inform their immediate Manager and/or the Vice President of Finance. This is particularly important for those in safety-sensitive positions.
- ▶ Employees who come to work under the influence of cannabis, alcohol or any other substance capable of causing intoxication or impairment will be sent home and will be subject to disciplinary action.
- ▶ Employees who cross the border regularly are reminded that U.S. Customs and Border Protection officials still generally take a dim view of the consumption of cannabis and have the power to ban individuals with a history of drug use from entering the United States.
- ▶ Marijuana has a very strong smell and can be detected on one's clothes or hair after consuming it. Employees should be mindful of this fact and be aware they are representing **Castle Building Centres Group Ltd.** when they are on the job. They are therefore asked to maintain a professional image and avoid coming to work smelling of marijuana smoke.

Failure to comply with this policy will result in disciplinary action up to and including termination of employment.

SMOKING POLICY:

Castle Building Centres Group Ltd. is required by law to prohibit smoking in an enclosed workplace and to comply with all Municipal Guidelines and By-Laws. Your health is important to us!

- ▶ You are not permitted to smoke in Company vehicles, whether owned, rented or leased.
- ▶ You may have a cigarette outside the building, at least nine (9) metres away from any doors, windows and/or air intakes, without offending anyone, while you are on lunch or a scheduled break.
- ▶ You are asked to properly extinguish and dispose of your cigarette waste. Do not litter.
- ▶ Excessive smoke breaks will be monitored and may give rise to progressive discipline.

Drivers are reminded that it is now an offence in most provinces to smoke or hold lighted tobacco when a child (age defined by provincial legislation) is in the same motor vehicle. Because work vehicles are regarded as an extension of the workplace, you must refrain from smoking in any Company vehicle or other vehicle provided for work use. You must also refrain from smoking in your own private vehicle when any other individual is accompanying you for business purposes.

Note: This policy also applies to medical marijuana and "tobacco-free" smoking aids (i.e., nicotine inhalers, electronic cigarettes ("e-cigarettes"), water pipes, etc.). Employees are prohibited from smoking or otherwise consuming recreational marijuana or cannabis products (including edibles) on Company premises, in Company vehicles, on breaks or at any time while on duty. Legalization of recreational marijuana does not mean that employees are entitled to show up for work in an intoxicated state. Employees with a valid prescription for medical marijuana should notify the Vice President of Finance before consuming such products in the workplace, during breaks or prior to their work shifts. Please refer to the ***Alcohol and Substance Use Disorder policy*** on page 41 for further information.

RIGHT TO REFUSE UNSAFE WORK:

With certain exceptions, the right to refuse unsafe work is a legal right of every worker in Canada. At **Castle Building Centres Group Ltd.**, we are committed to upholding this right and to ensuring a safe workplace for us all.

- ▶ If you have any health and/or safety concerns, bring them to the attention of your Manager immediately.
- ▶ If you believe that the health and/or safety of you or anyone else may be endangered by the physical condition of the workplace or by any equipment or machine you are to use or operate, you have the right to refuse this unsafe work. You must immediately report the refusal and your reasons to your Manager and/or a member of the Joint Health and Safety Committee.
- ▶ Our Management will be informed of the situation and your Manager will investigate the concern with you. This should resolve the situation or satisfy your concern.
- ▶ If, after the investigation, you still have reason to believe that you could be in danger, you may be assigned to other reasonable work and a Ministry of Labour official may be contacted to assist in further investigation.
- ▶ No reprisals will be taken against any employee who acts in compliance with or seeks enforcement under the provisions of the governing health and safety legislation.

Section 5

PROGRAMS & BENEFITS

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

TRAINING:

We succeed at **Castle Building Centres Group Ltd.** because we adhere to high standards. The foundation for success is based on having organized and well-trained employees.

- ▶ A supervised training program is provided for all new employees, most of which is on-the-job training.
- ▶ Other training programs include workshops.

SEMINARS, CONFERENCES, WORKSHOPS, ETC.:

- ▶ From time-to-time, we may request that you undertake special training necessary for your job function. Your attendance at any seminar, conference, workshop, etc. will be subject to the approval of your Manager.
- ▶ You may also request special training yourself.
- ▶ Financial assistance for approved seminars, conferences, workshops, etc. will be granted on a subsidized payment basis at time of registration.

PROFESSIONAL DUES AND SUBSCRIPTIONS:

At **Castle Building Centres Group Ltd.**, we will pay for basic professional and membership dues where such associations are related to your work.

- ▶ Magazine or online subscriptions are paid for by you, unless the subscription is of benefit to the rest of the Company.
- ▶ All dues and subscriptions must be authorized by Senior Management.

GROUP RRSP:

The Group RRSP provides an opportunity to save for retirement with a number of investment options through convenient payroll deduction. After one (1) year's continuous employment, full-time employees become eligible to participate in the Group RRSP underwritten by Manulife Financial and administered by Bencom Financial Services.

- ▶ There are no separate administrative fees associated with the plan. Employees and Company contributions are tax deductible and income earned in the Plan accumulates tax free until withdrawn.
- ▶ The Company's contribution is added to the employee's T4 as a taxable benefit.
- ▶ The Company will match new contributions dollar for dollar up to 4% of your base salary.
- ▶ The employee's portion is fully vested and the employers' contribution vests irrevocably when paid into the plan. The Company submits all amounts withheld from employees and the Company's contribution to the plan monthly. Employees receive semi-annual statements of the activity in their individual funds.

For further information regarding direction of your funds you can call Bencom Financial Services at 1-888-664-5555.

CONTINUING EDUCATION:

Employees are encouraged to upgrade career-related skills to aid in the performance of their duties or prepare for promotion or advancement.

- ▶ Employees wishing to enroll in courses must obtain prior approval from their Manager.
- ▶ To qualify for reimbursement, the employee must be employed by **Castle Building Centres Group Ltd.** for the duration of the course.
- ▶ Employees will be reimbursed upon successful completion of the course.

REWARDS & RECOGNITION PROGRAM:

At **Castle Building Centres Group Ltd.**, we wish to recognize all of our dedicated employees, especially those who are the top performers. Along with Company sponsored parties and other social events, we have rewards that we give to recognize you. We hope that they are of value to you and demonstrate our appreciation for your continued commitment.

SERVICE AWARD PROGRAM:

Recognizing important service anniversaries for our employees has always been important at **Castle Building Centres Group Ltd.**

- ▶ Our employees who are celebrating 5, 10, 15, 20 and 25 years of service (and over), receive recognition for their contribution to the Company's success.

EMPLOYEE PURCHASE PROGRAM:

One of the benefits of being an employee of **Castle Building Centres Group Ltd.** is the ability to take advantage of the preferred buying arrangements we have with suppliers to purchase merchandise at cost.

- ▶ This benefit is available to any employee after three (3) months of continuous service.
- ▶ Employees may make purchases for their own use or on behalf of their immediate family.
- ▶ Purchases are not surcharged and the supplier's term discount is available to you providing your payment is forwarded to the Accounts Receivable Coordinator on or before the due date. The supplier's invoice should already include H.S.T. and delivery if applicable.
- ▶ Accounts over 60 days will be subject to payroll deduction and possibly loss of further purchasing privileges. Upon termination, any outstanding invoices become due and will be deducted from your final pay.
- ▶ The order is placed through the merchandise department on a **Castle** purchase order. Consequently, the employees' Manager should approve all orders in excess of \$500.

COMPANY ACTIVITIES & PARTIES:

At **Castle Building Centres Group Ltd.**, we may organize and give financial support to various social activities and events for the enjoyment and relaxation of our employees throughout the year.

- ▶ A designated driver is required if you consume alcohol, over the legal limit, or are under the influence of any drugs (including recreational or medical marijuana or any other form of cannabis including edibles) at any of these events.
- ▶ If you are unable to have a designated driver, we insist that you make alternate arrangements (i.e., taxi, stay overnight at a hotel). **DO NOT DRINK AND DRIVE OR DRIVE HIGH!!**

EMPLOYMENT BENEFITS:

At **Castle Building Centres Group Ltd.**, we are pleased to offer you, our employees, valuable employment benefits which amount to a considerable number of dollars each year in addition to the wages you earn. Some of these benefits are required by governing legislation while others have been initiated by the Company.

- ▶ Information on our Company Benefit Plan is detailed in the benefits booklet provided by our program carriers.

Should you have any questions or concerns, please contact the Vice President of Finance.

Section 6

COMMUNICATIONS

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

EMPLOYEE COMMUNICATIONS:

As a member of our team, we value your opinion and your ideas. We have set up a comprehensive communications system for you.

- ▶ The person to whom you report is the person to contact if you have any questions, concerns, complaints or suggestions.
- ▶ It is important that you take advantage of the open communications practice to keep Management informed on all subjects of interest and value to the Company.

MEETINGS:

At **Castle Building Centres Group Ltd.**, we believe communication is important to keep you informed about what is happening in the Company. General meetings may be scheduled periodically at a time we believe to be convenient to our employees.

- ▶ We use these meetings to discuss policy, procedures, Company promotions, new products and/or services and concerns. Management will keep you up-to-date on member matters as well as anything that may affect you as an important member of the **Castle Building Centres Group Ltd.** team. This also gives you a chance to ask questions and offer good ideas.
- ▶ Attendance is voluntary, but strongly encouraged.

Informal Meetings:

- ▶ "Informal Meetings" are small informal discussions and/or meetings held occasionally between employees and Management.
- ▶ We use these sessions to discuss ideas, suggestions or concerns.
- ▶ All informal meetings are held on an as needed basis.

BULLETIN BOARDS:

At **Castle Building Centres Group Ltd.**, we use bulletin boards to communicate important information such as policy changes, promotions, job opportunities, safety notices, other Company memos, as well as social information.

- ▶ Bulletin boards are located in the Kitchen.
- ▶ You are responsible for reading the information that is posted.
- ▶ You may post your own information on these boards.
- ▶ All postings must adhere to the following guidelines:
 - ▶ posting must not obscure Company information; and
 - ▶ posting need not be authorized by a Manager before being posted.

SOLICITATIONS, CAMPAIGNING, CANVASSING AND DISTRIBUTIONS:

In order to maintain a professional working environment, **Castle Building Centres Group Ltd.** has established the following guidelines regarding soliciting, campaigning, canvassing and distributions:

- ▶ Solicitations for funds, memberships or individual commitment to outside groups or the distribution of literature for any purpose is prohibited and is cause for disciplinary action.
- ▶ Under no circumstances is the posting or distribution of political literature permitted in the building or around Company premises.
- ▶ Outside distributors or vendors who are promoting products and services that are not related to Company business are prohibited from soliciting at **Castle Building Centres Group Ltd.** during working time.
- ▶ Incidents of any of the foregoing should be reported to Management immediately.

CELLULAR PHONE POLICY:

At **Castle Building Centres Group Ltd.**, we recognize the convenience and usefulness of cellular phones as vital business tools. However, care and caution must be exercised in order to prevent disturbances to your co-workers and maintaining health and safety at all times, particularly while driving. At all times, any legislation/regulations restricting the use of cellular phones (e.g., while driving or while inside a hospital) **MUST** be respected and adhered to.

COMPANY-ISSUED CELLULAR PHONES:

- ▶ Cellular phones may be left on when attending meetings or Company functions.
- ▶ You are responsible for the upkeep and condition of your Company cellular phone.
- ▶ The Company has the right to request a full reimbursement for any personal use of a Company-provided cellular phone.

USE OF CELLULAR PHONES WHILE DRIVING:

The use of cellular phones and other electronic devices while driving is distracting to drivers and hazardous to other employees, passengers and the general public. This policy is meant to ensure you operate Company vehicles and private vehicles safely while on work time and when conducting business.

- ▶ You must adhere to all governing legislation regarding the use of cellular phones or other hand-held electronic devices while driving. In particular, employees are cautioned that talking on a cellular phone or text messaging while driving is an offence in most Canadian jurisdictions. It is also illegal to use a hand-held GPS, personal audio device or similar device that does not have a hands-free function. In some jurisdictions, it is illegal to program a GPS device while driving, even if it is built into your vehicle. Similar legislation also exists in several U.S. states and overseas. Therefore, you must not use hand-held electronic devices while driving if such conduct is prohibited by law.
- ▶ ***Violation of this policy will be subject to progressive discipline up to and including termination of employment.***

PORTABLE ELECTRONICS POLICY:

With the increasing popularity and availability of portable electronic devices including devices such as smart phones, tablets and personal audio devices, **Castle Building Centres Group Ltd.** has established guidelines on their appropriate use to minimize any negative impact on your co-workers and daily business operations.

▶ *Procedure*

- ▶ Do not leave any portable electronics in your vehicle unless they are out of sight (e.g., in the trunk or in the glove box).
- ▶ All portable electronic devices should be set to 'Silent' mode while attending meetings unless there is a compelling business reason not to.
- ▶ If any Company-issued portable electronic device is lost, stolen or damaged, report it immediately. In some cases, the device can be disabled remotely, clearing all of the stored content in the process.
- ▶ Where possible, all portable electronic devices must be password-protected/locked. It is highly recommended that you change your password on a regular and frequent basis.
- ▶ You must not use any handheld portable electronic device or music players, including a personal audio device, or cellular phone, while driving, unless that piece of equipment has been equipped with a hands-free device, and provided the use of such hands-free devices is permitted by law.

E-MAIL:

- ▶ You should be aware that there is **no** reasonable expectation to privacy in use of e-mail or the Internet while in the workplace.

The Company reserves the right to randomly monitor the system. Under certain circumstances, misuse of Company Internet access or e-mail systems will give rise to progressive discipline, up to and including termination of employment.

AVOIDING ELECTRONIC SPAM COMMUNICATIONS:

Canada's Anti-Spam Legislation (CASL) is a piece of federal legislation that came into force on July 1, 2014. While there are several exceptions, CASL's main purpose is to prohibit unsolicited electronic commercial messages sent via telecommunications in the form of e-mails, text messages or other electronic means (other than two-way voice conversations, voicemail messages or faxes). Penalties for non-compliance are considerable, both for organizations and individuals.

- ▶ **Castle Building Centres Group Ltd.** expects all employees, managers, consultants, contractors and freelancers to respect and abide by the principles of CASL in all dealings with members, prospects and other recipients of our electronic commercial messages.
- ▶ In particular, employees must avoid sending unsolicited commercial messages to individuals who have either not consented to receive such communications or who have withdrawn their consent. Exceptions include individuals with whom we have an ongoing business relationship, those who have inquired about our products/services or who have recently lodged a complaint with us. There are also exceptions for those whose e-mail addresses are publicly available or who have provided us with their e-mail addresses – without explicitly stating that they do not wish to receive unsolicited commercial messages.

- ▶ All employees in member-facing roles will receive training on CASL compliance.
- ▶ All employees must obtain prior approval from Management before sending any broadcast e-mail solicitations.

Further information is available by contacting your Manager or the Human Resources Representative.

SUGGESTIONS:

While doing your work, you may come up with a better way of conducting business or improving our workplace. We welcome your suggestions as they are important to our collective future and success.

- ▶ Your suggestions will be kept in the strictest of confidence unless you state otherwise.
- ▶ We welcome your input. Most of our new ideas come from you.

PRESS RELEASE POLICY:

In order to have a consistent point of contact with the media, we at **Castle Building Centres Group Ltd.** have established the following guideline:

- ▶ All requests for information must be passed on to the Executive Management.

IF PROBLEMS ARISE:

At **Castle Building Centres Group Ltd.**, we are committed to providing an effective and acceptable means for you to bring problems and complaints concerning your well-being at work to the attention of Management.

- ▶ You are entitled to a fair and prompt resolution of all complaints without fear of reprisal or embarrassment.
- ▶ While the majority of employee problems are resolved through informal and honest discussions with an immediate Manager, there may be times when this may be inadequate or impossible. When this happens, the complaint procedure may be used.
- ▶ Complaints should be filed as soon as possible after the incident occurs.

- ▶ **Procedure:**

- a) Discuss the issue with your Manager unless the issue involves your Manager.
- b) If the issue involves your Manager, take the issue to their superior, or to the Vice President of Finance.
 - ▶ At this stage, the issue need not be documented unless either the employee or the person to whom the complaint is reported, requests that the complaint be in writing.
 - ▶ If after using the procedure above, you cannot get satisfactory resolution in a timely manner, take the complaint to either:
 - ▶ Your Manager; or
 - ▶ The President.

Notes:

Section 7

EMPLOYMENT/COMPENSATION POLICIES

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

PROBATIONARY PERIOD:

At **Castle Building Centres Group Ltd.**, our new employees must undergo a probationary period. If we, in our sole discretion, determine the probationary employee is not suitable, then the employment relationship will be terminated, with no notice or compensation in lieu of notice, except where required by the applicable employment standards legislation.

- ▶ The probationary period for our new employees normally lasts for three (3) months from the date of hire.
- ▶ During this time, we evaluate qualifications, skills and "fit" within our Company. This also gives new employees the opportunity to decide if **Castle Building Centres Group Ltd.** is a place in which they feel comfortable and would like to work.
- ▶ The given time frame stated above does not constitute an obligation on our part to retain a new employee until the end of the probationary period. This period involves special orientation activities plus closer and more frequent performance evaluations than those given to regular employees.
- ▶ During this time, the Company or the new employee may terminate the working relationship without advance notice, except as prescribed by governing legislation.
- ▶ Prior to the end of the probationary period, a probationary review will be conducted to determine your suitability for regular employment. At the end of the probationary period, we may extend the evaluation period for an additional allotment of time for performance reasons, or where we require additional time to assess your suitability for regular employment.
- ▶ Upon satisfactory completion of the probationary period, the new employee will officially achieve regular full-time or part-time employee status or as otherwise stated in an employment contract, and, as such, will be eligible for most of our benefits (exceptions would be benefits that have a specific waiting period).
- ▶ If the probationary period is greater than three (3) months, the new employee will begin to receive Company benefits after the first three (3) months of probation.
- ▶ Upon conclusion of the probationary period, the new employee will then be expected to meet and maintain Company standards for job performance and behaviour expected of all regular employees.
- ▶ Employees terminated after the completion of the "Probationary Period" will be given notice or pay as specified in the governing employment legislation.

ORIENTATION PROGRAM:

During your first few days of employment, you will participate in an orientation program conducted by various members of your department, including your Manager. The purpose of the orientation is to familiarize you with **Castle Building Centres Group Ltd.** so that you may begin your career with us in a positive manner.

- ▶ During this program, you will receive important information regarding the performance requirements of your position plus other information necessary to acquaint you with your job and the Company. You will also be asked to complete all necessary paperwork such as medical benefit plan enrollment forms, beneficiary designation forms and appropriate tax forms.
- ▶ Please use this orientation program to familiarize yourself with our Company, our policies and benefits and to meet your co-workers.

- ▶ We encourage you to ask any questions you may have during this program so that you will understand all the guidelines that affect and govern your employment relationship with us.
- ▶ **Castle Building Centres Group Ltd.** will provide all new employees with the most recent copy of the Ministry of Labour's employment standards poster, and any other information required under governing legislation, within 30 days of the employee's date of hire or as outlined within the regulations.

Should you have any questions or concerns, please contact your Manager.

HOURS OF OPERATION:

Our Company is officially open Monday to Friday from 8:00 a.m. to 4:30 p.m. EST.

STARTING TIME (FLEX-TIME):

Your individual schedule is to be set in consultation with your Manager.

- ▶ Due to the scheduling of meetings etc., you must give at least five (5) days' notice to your Manager of any requests to change your start time.
- ▶ Full-time employees work 35 hours per week (with the exception of the Receptionist).

SCHEDULED BREAKS:

- ▶ Employees working eight (8) hour shifts are entitled to two (2) informal breaks lasting 15 minutes each per shift.
- ▶ Lunch breaks are 60 minutes and are unpaid.
- ▶ All employees working more than five (5) consecutive hours are entitled to a 30-minute unpaid meal break.

MINIMUM REPORTING PAY:

Effective January 1, 2019, if you regularly work more than three (3) hours a day and report to work but **Castle Building Centres Group Ltd.** does not have a minimum of three (3) hours of work for you; excluding emergency situations, or reasons beyond **Castle Building Centres Group Ltd.'s** control, you will be paid the greater of:

- ▶ the amount you earned for the time worked plus wages equal to your regular rate of pay for the remainder of the time; or
- ▶ wages equal to your regular rate for three (3) hours of work.

OVERTIME:

At **Castle Building Centres Group Ltd.**, overtime is sometimes necessary to meet schedules and the needs of our members. In *exceptional circumstances*, Management has the right to determine and schedule overtime and shall give notice of overtime as far in advance as possible.

Overtime will normally be distributed on a voluntary basis. However, in exceptional circumstances and in accordance with employment standards legislation, compulsory overtime may be required to meet legitimate business needs. You will only be **required** to work overtime in order to avoid serious interference with the ordinary working of **Castle Building Centres Group Ltd.'s** establishment or operations.

- ▶ If you are a non-exempt employee (i.e., employees up to the level of Supervisor/Manager or non-professional employees), you are eligible for overtime pay if you are required to work the overtime.
- ▶ Overtime must have prior approval of Management and must be accurately recorded and reported.

In extenuating circumstances, pre-approval of overtime may not be feasible when a Manager is unavailable; therefore, in these special circumstances, overtime hours will be authorized after the fact (i.e., dealing with an emergency, helping a member after hours, etc.).

- ▶ We recognize that employees often take the initiative to stay and get the work done, whether or not they specifically have been asked to work overtime. Because this has financial implications, be sure you have discussed with the Manager the circumstances under which you should take this initiative.
- ▶ The practice of working on a regular basis prior to your official starting hour, through lunch hour, or after official closing hour, as a result of an unusual commuting schedule will not be recognized as overtime.

MANAGERS AND SUPERVISORS:

Managers and Supervisors are generally exempt from overtime provisions under provincial employment standards legislation. Therefore, Managers and Supervisors are not usually entitled to receive overtime pay for overtime work. An employee will be classified as a Manager or Supervisor for the purposes of overtime pay even if that individual performs some work that is not managerial in nature, as long as such work is performed only on an irregular or exceptional basis.

EMPLOYEES / INDIVIDUAL CONTRIBUTORS:

Most non-managerial employees, whether salaried or hourly, are entitled to be paid overtime. You will be paid an overtime rate of time-and-one-half (1.5 times) or equivalent time in lieu for hours worked in excess of 44 hours per week.

- ▶ **Statutory Holidays:** Where an employee works on a statutory holiday and receives premium pay for those hours (i.e., straight time plus a holiday premium of one and a half times regular pay), the hours worked on the holiday will be excluded from the calculation of overtime.

Where an employee is given a day off with pay for a statutory holiday and does not work on that day, the hours for which that employee receives holiday pay will also be excluded from the calculation of overtime.

Where an employee works on a statutory holiday and receives regular pay for those hours along with a substitute day off work, the hours worked on the holiday will be included for the calculation of overtime.

- ▶ These hours will be tabulated using Attendance Sheets.

WHERE TWO OR MORE REGULAR RATES OF PAY:

Effective January 1, 2018, if you have two or more regular rates of pay for work performed for **Castle Building Centres Group Ltd.** in a work week, you are entitled to be paid an overtime rate of one and one-half times the regular rate that applies to the work performed for each hour of overtime.

ABSENTEE SHEETS:

The Company will maintain an Attendance Log for their salaried employees.

- ▶ Overtime and Absentee Sheets are necessary in order to have a record of employment and overtime and to provide documentation for government reporting requirements.
- ▶ It is the employee's responsibility to sign and submit the Absentee Sheets to certify the accuracy of all time recorded.
- ▶ Absenteeism is monitored regularly by Management. If you have an unsatisfactory attendance record, you will be contacted by the Manager to discuss the situation. Depending on the nature of the absences, you may be subject to progressive discipline.

TIME SHEETS:

Each Department is required to produce a time sheet each pay period for their hourly employees.

- ▶ Time sheets are necessary in order to have a record of employment and overtime and to provide documentation for government reporting requirements.
- ▶ It is your responsibility to sign your time records to certify the accuracy of all time recorded.
The Manager will review and then initial the time record before submitting it for payroll processing.

PAYROLL PROCESSING:

- ▶ You will be paid every other Friday by automatic bank deposit.
- ▶ A pay stub noting the hours worked, gross pay, deductions and deposit amount will be available on this day.
- ▶ Your automatic bank deposit covers the pay period ending on the Friday at 4:30 p.m.
- ▶ If payday falls on a holiday, you will be paid on the preceding workday.
- ▶ New employees will be advised of their starting rate at the time of hire.
- ▶ Statutory deductions for federal and provincial taxes, Canada Pension Plan and Federal Employment Insurance, all required by law, are deducted from your earnings.
- ▶ These deductions may change, from time to time, as they are affected by changes in the amount you earn and by governing legislation. All such changes will be communicated to you in a timely manner.
- ▶ We offer our employees programs and benefits beyond those required by law. If you are eligible, you may voluntarily authorize deductions from your earnings to cover the costs of participation in these programs.
- ▶ We do not facilitate "Pay Advances."
- ▶ We do not cash personal or business cheques.

Should you have any questions regarding your payroll, please contact the Vice President of Finance.

VACATION PLAN:

At **Castle Building Centres Group Ltd.**, we encourage you to take your vacation time every year. The following vacation plan is designed to provide you with the opportunity for adequate rest and relaxation.

ALL EMPLOYEES:

- ▶ Your vacation time is based on the length of continuous service with the Company and your employment contract with **Castle Building Centres Group Ltd.**
- ▶ Both active and non-active employment is included for the purposes of determining vacation time entitlement. Your entitlement to vacation accrues so long as the employment relationship continues. Time spent on maternity leave, emergency leave, an approved leave of absence, a temporary lay-off, sick leave, or any other period of inactive employment of less than two (2) months, will be credited to you in calculating your vacation time entitlement.
- ▶ Your vacation pay is based on the wages earned in the prior year.
- ▶ The vacation year is defined to be the 12-month period between January 1 and December 31 for all employees.
- ▶ Selection of vacation time will be made on a seniority basis within each department. We reserve the right to limit the number of employees who can be off at any one time.
- ▶ You must obtain vacation request approval from the Manager before you commit to any travel arrangements or other commitments.
- ▶ Vacations should normally be taken in no less than one (1)-week periods. However, you may request permission, from the Manager to take vacation time in days rather than weeks.
- ▶ Employees entitled to more than two (2) weeks' vacation should not take more than two (2) weeks at a time except as specifically approved by their Manager.
- ▶ If a statutory holiday occurs during your vacation, you may take an extra day off at the time of your vacation, or at a later date as agreed to by the Manager.
- ▶ Annual vacation earned prior to a legislated leave of absence must be taken within 10 months after it was earned. If this time falls while you are on leave, you must take the remaining vacation time at the end of your leave, or get approval from your Manager to take the vacation time at a later date.

REGULAR EMPLOYEES:

- ▶ If you are a new employee, vacation entitlement accrues during the standard probationary period but may not be taken until you have successfully completed your probationary period.

Should you have any questions or concerns, please contact the Vice President of Finance.

VACATION PLAN FOR ALL EMPLOYEES: (HOURLY & SALARIED)

Less than 1 year of employment	Pro-rated on a monthly basis
Completion of 1 year but less than 3 years	10 days calculated at 4% of vacationable earnings
Completion of 3 years but less than 10 years	15 days calculated at 6% of vacationable earnings
Completion of 10 years but less than 20 years	20 days calculated at 8% of vacationable earnings
Completion of 20 year or more	25 days calculated at 10% of vacationable earnings

The above are based on full years of employment.

These are minimum vacation entitlements that can be superseded in an employment letter or by authorization of the President or Vice President.

They do not include...

- ▶ money paid on behalf of employees to benefit plans; and/or
- ▶ expenses.

VACATION SCHEDULES:

- ▶ Employees are expected to submit their requested vacation time as soon as possible.
- ▶ To be fair, those employees who did not have vacation time off during the prior years' Christmas vacation period will be given preference for that period in the current year provided such time is booked off prior to October 31st of the current year.

VACATION DEFERRAL:

- ▶ Vacations earned in a year should be taken within that year.
- ▶ Employees may defer a maximum of 10 days of vacation time up to 12 months into the following vacation year. Management reserves the right to schedule any unused vacation time above the 10 days.
- ▶ In accordance with the *Employment Standards Act*, all employees must take the legislated minimum amount of vacation time annually based on your length of service with **Castle Building Centres Group Ltd.** Management reserves the right to schedule any unused vacation time. Unused vacation time above the legislated minimum may be forfeited.

VACATION PAY ADVANCES:

- ▶ We do not facilitate vacation pay advances.
- ▶ Vacation Pay is regularly paid to part-time employees with each pay.

HOLIDAYS:

We, at **Castle Building Centres Group Ltd.** recognize the following days as official holidays:

HOLIDAY	DATE
1) New Year's Day	January 1
2) Family Day	3 rd Monday in February
3) Good Friday	Friday before Easter Sunday
4) Victoria Day	Monday closest to May 24
5) Canada Day	July 1st
6) Civic Holiday*	1 st Monday in August
7) Labour Day	1 st Monday in September
8) Thanksgiving	2 nd Monday in October
9) Christmas Day	December 25
10) Boxing Day	December 26

Plus: Early closing prior to Christmas and New Year's holidays.

Full-time and Part-time Employees:

- ▶ To qualify for holiday pay for the above holidays, you must have worked the full regular scheduled day preceding and following the holiday.
- ▶ A health care practitioner's certificate indicating ill health for either of the qualifying days will provide justification for payment. Similarly, other unavoidable absences for reasons beyond your control will likely not disentitle you. Such absences include, but are not limited to, sick leave, family responsibility leave, bereavement leave or family medical leave.
- ▶ If the holiday falls within your vacation period, you shall be entitled to and may choose an extra day of vacation with pay. This day must be agreed upon with Management.
- ▶ Statutory holiday pay will not be paid during a leave of absence.
- ▶ Statutory holiday pay will not be paid when you are being paid under our sickness and accident policy.
- ▶ At the discretion of our Management, a holiday may be observed on a day other than as proclaimed. A notice will be posted and/or handed out ahead of time.

STATUTORY HOLIDAY PAY:

At **Castle Building Centres Group Ltd.**, we will abide by all applicable employment legislation with regards to payment of holiday pay.

- ▶ If your hours of work differ from day to day or if you are paid on a basis other than time, the amount of statutory holiday pay you will receive will be the average of your daily earnings (exclusive of overtime) for the days worked in the 20-day work period immediately preceding a public holiday.

SUBSTITUTE (LIEU) DAY OFF:

If another working day with holiday pay is substituted for a public holiday, **Castle Building Centres Group Ltd.** will provide you a written statement, prior to the holiday, indicating the holiday you are working and the date of the substitute (lieu) day off.

- ▶ The substitute day off shall be taken within three (3) months of the public holiday.
- ▶ **Castle Building Centres Group Ltd.** reserves the right to schedule one or more lieu days on your behalf if you have not requested a specific day off within a month of the stat holiday in question.

RELIGIOUS HOLIDAYS:

Castle Building Centres Group Ltd. will accommodate your specific religious beliefs by allowing you to take time off work to observe religious holidays when required to do so by your faith.

- ▶ Absence from work will be allowed unless your attendance on the day(s) in question is vital and essential to the continuing operation of the Company, and would constitute an undue hardship, as decided by Senior Management.
- ▶ You must notify the Manager at least five (5) days in advance of your intention to be absent from work due to your need to celebrate a specific religious holiday or period of religious celebration.
- ▶ You will, at all times, be given the option of either using part of your currently earned vacation day(s) or to make up your absence through overtime, as governed by employment standards legislation, or through work schedule changes, as mutually agreed upon by both yourself and Management.
- ▶ Permanent shift changes may be requested where a regularly scheduled workday falls on a designated holy day or Sabbath in accordance with your religion. Again, the doctrine of undue hardship will apply.

ABSENTEEISM POLICY:

At **Castle Building Centres Group Ltd.**, regular and consistent attendance is critical to the success of our business. The absenteeism policy defined below will be consistently applied to all our employees and will be fairly enforced. No exceptions will be made unless agreed to by Management, communicated to you and documented with a copy placed in your employee file.

- ▶ Human rights legislation requires an employer to accommodate an employee for non-culpable absenteeism due to illness and as such, the use of verbal or written warnings would not be appropriate. Please see definitions below:

Culpable absenteeism: implies fault on the employee. It includes an absence without leave, abuse of granted leave of absence, and problems such as lateness, leaving early, or overstaying breaks.

Non-culpable absenteeism: indicates a failure to attend work for circumstances beyond the employee's control. Typically, non-culpable absenteeism relates to an illness, whether chronic or a variety of separate illnesses causing either one long absence or frequent short-term absences.

- ▶ You are expected to be at your work area ready to start at your scheduled starting time.
- ▶ If you are ill and cannot come into work, you should call your Manager at least 30 minutes, or as soon as possible, prior to your scheduled start time.
- ▶ Always speak with your immediate Manager and notify the Receptionist. If they are unavailable, speak with a more senior Manager in your department.
- ▶ If you are too ill or unable to call in yourself, have someone else call in for you and leave a message with your Manager.
- ▶ Unless prohibited under governing legislation, absences, due to illness or injury, of five (5) working days or more must generally be documented by a health care practitioner's note confirming:
 - ▶ date of examination;
 - ▶ that you are unable to attend work for medical reasons (Please ensure your health care practitioner does not write in a diagnosis); and
 - ▶ the estimated recovery time before you may return to work.
- ▶ Attendance is monitored regularly by Management and the Vice President of Finance. If you have an unsatisfactory attendance record, you will be contacted by your Manager to discuss the situation. Depending on the nature of the absences, you may be subject to progressive discipline.
- ▶ Excessive non-culpable or innocent absenteeism can also ultimately result in termination of employment. However, employees with absenteeism issues beyond their control will be dealt with through coaching, counselling and accommodation of disabilities where applicable, as opposed to using the disciplinary procedure.
- ▶ All terminations under this policy must be reviewed and authorized by your Manager and the Vice President of Finance prior to implementation.
- ▶ IF YOU ARE ABSENT FOR THREE (3) CONSECUTIVE WORKING DAY(S) without notifying the Company it will be deemed that you have abandoned your position and have resigned from your employment with **Castle Building Centres Group Ltd.** If you are absent and are unable to contact us for reasons beyond your control (such as an accident, illness, or any other unexpected event), you or someone on your behalf must contact us at the first opportunity.

PUNCTUALITY:

To be successful, you are expected to be at work, on time, each day. Habitual tardiness and absenteeism will be reviewed by your Manager for prompt correction or remedy.

All Employees:

- ▶ If a pattern of lateness develops, the Manager will discuss the situation with you. Depending upon the frequency and cause of your lateness, you may be subject to discipline and possible termination as outlined in "Progressive Discipline" in this Handbook.
- ▶ Employees who are late may have any missed time deducted from their pay, particularly if the time is not made up later that day or at some other time.
- ▶ Written records of attendance, absenteeism and tardiness are maintained in our employee files.

UNREPORTED ABSENCE:

- ▶ An unreported absence occurs when you do not show up to work and do not report your absence to your Manager.
- ▶ Examples include, but are not limited to:
 - ▶ an automobile accident; or
 - ▶ traffic foul-up.
- ▶ These incidents must be reported to your Manager at the first opportunity.
- ▶ Incidents of unreported absence which are not reported may be deemed wilful misconduct and subject to progressive discipline up to and including termination.
- ▶ If the reason for the unreported absence is not acceptable, you may be disciplined and/or may not be paid for the period of unreported absence or lateness.

SICK DAYS:

All sick days used by an employee under this provision are counted towards any days that an employee is entitled to under governing employment legislation.

- ▶ Should you have any questions or concerns, please contact the Vice President of Finance.

Salaried Employees:

If you are a salaried employee, you are allocated six (6) days sick days per year, after you have successfully completed your probationary period of employment. However, during your probationary, you will be entitled to time off for sick leave, family responsibility leave or bereavement leave in accordance with governing employment legislation.

- ▶ All sick time will be monitored on an ongoing basis. Your Manager will address high incidence of sick leave on an individual basis, if a concern exists.
- ▶ You are entitled to receive up to two (2) paid hours, in addition to the one (1) hour for lunch if the time taken is adjacent to this hour, for scheduled appointments (i.e., doctors, dentists, etc.) for yourself or a sick family member. If the required appointment is in excess of two (2) hours, you may use your sick days, or part of a sick day, for scheduled appointments (i.e., doctors, dentists, etc.).
- ▶ If you take any part of a day to attend to a sick person in your family, this will be considered ½ day minimum.

If any portion of the six (6) days is not used up at the end of the year, those extra days may not be taken as time off and no extra money is paid out.

- ▶ The Company has the right to deduct further pay for sick days beyond the six (6) days.

Hourly Employees:

If you are an hourly employee, you are not paid for sick days. Generally, hours are paid for hours worked.

- ▶ You may be able to make up time for sick days or time taken for appointments. Speak to your Manager to determine if this option is available.
- ▶ All sick time will be monitored on an ongoing basis. The Manager will address high incidence of sick leave on an individual basis, if a concern exists.

Note: Castle Building Centres Group Ltd.'s company policy provides for sick days above the minimum legislated requirements. All sick days used under the company policy, whether paid or unpaid, are counted towards your legislated entitlement.

PERSONAL BUSINESS:

For the purpose of additional unpaid leave for personal or other business:

- ▶ Wherever possible, if you require additional time off from work (without pay over and above your vacation, personal leave or legislated leaves of absence), you must notify your Manager no later than five (5) full working day(s) in advance before you require the time off.
- ▶ The circumstances must be discussed with your Manager or Department Manager and a decision will be made as to whether this is an excusable absence.

REQUEST TO LEAVE WORK EARLY/ARRIVE LATE:

At **Castle Building Centres Group Ltd.**, we understand that, on occasion, you may need to request to leave work early or arrive late due to illness or appointments which could not be made at any other time and for other emergencies.

- ▶ You should make a request to leave early, or arrive late, to immediate Manager at least five (5) full working day(s) in advance, if possible.
- ▶ Each request will be dealt with on an individual basis. Based on workload, scheduling, etc., permission may or may not be granted.
- ▶ If you request to leave early for non-emergency purposes, you must discuss your request with immediate Manager and receive permission prior to leaving.
- ▶ You may be required to make up the lost time in advance, or within the following week.
- ▶ If you are unable to make up the lost time, or choose not to do so, for payroll purposes, you will be paid only for the time you worked.

DRESS POLICY:

It is our desire to create a work environment that is both professional and comfortable and abides by health and safety legislation. While recognizing that employees have their own personal taste and style, **Castle Building Centres Group Ltd.** recommends that you use common sense in choosing your work attire and remember that you are in a place of business.

Should you have any questions or concerns, please contact the Vice President of Finance.

OFFICE:

Your personal attire should be neat and clean and should always reflect a professional image that is conducive to an office environment.

- ▶ Business casual attire permits employees to come to work in a less formal fashion, while at the same time projecting a professional image. *Any clothing worn to the office, including shoes, should be clean and in good repair (i.e., no holes or fraying).*
- ▶ Examples of inappropriate attire that may be deemed unacceptable in the workplace include (but are not limited to): facial jewellery of any kind (e.g., nose rings) unless worn for a bona fide religious purpose, tight leggings, fleece, cut offs and short shorts, muscle shirts, halter tops, sweat pants, pants made of spandex type fabric, torn clothing or clothing with holes, etc.
- ▶ Department Managers will enforce adherence to this policy by first guiding staff towards appropriate dress choices. If your grooming and dress are deemed inappropriate, you may be asked to go home and change into the appropriate attire. If this occurs, you will be expected to make up the lost time.

SALES AND PUBLIC APPEARANCES:

- ▶ You are expected to wear proper business dress attire when making all sales and public appearances. *Exception:* Appropriate casual dress attire may be worn during social functions (golf games, etc.).

CASUAL DAY:

Every Friday is considered "Casual Day" at **Castle Building Centres Group Ltd.** and all employees may dress accordingly. Common sense should be used.

- ▶ You are expected to dress in an appropriate manner (in accordance with the Dress Policy) and we ask that our casual dress policy is not abused.

PERSONAL HYGIENE:

At **Castle Building Centres Group Ltd.**, you are required to maintain the highest standards related to personal hygiene including bathing and use of deodorant, clean hands and nails, with hair cut in acceptable styles. You must be clean and well groomed at all times.

- ▶ Jewellery and cosmetics are permitted in office areas when worn in good taste and in moderation. Accessories should be standard items.
- ▶ Strong scents within the work area may cause irritation or allergic reactions in fellow employees. Scents may include perfumes/colognes, air fresheners, odiferous foods and even flowers. You should show consideration to each other by limiting the use of perfumes and other scents in the workplace.

LEGISLATED LEAVES OF ABSENCE:

Leave(s) of Absence are designed so that you may request time away from work and still have a job waiting for you when you return.

- ▶ At **Castle Building Centres Group Ltd.**, we will abide by all governing legislation with regards to all leaves of absence.
- ▶ If you do not return to work within three (3) working days of completing a period of approved leave of absence, you will be considered to have resigned from your employment. If for some reason you are unable to return to work, you must discuss this with your Manager and/or the Vice President of Finance prior to the end of the leave.
- ▶ Annual vacation earned prior to a legislated leave of absence must be taken within the prescribed time frame in accordance with governing employment legislation. If this time falls while you are on leave, you must take the remaining vacation time at the end of your leave, or get approval from your Manager to take the vacation time at a later date.
- ▶ In Ontario, the following legislated leaves of absence are job-protected:
 - ▶ Maternity Leave
 - ▶ Parental/Adoption Leave
 - ▶ Emergency Leave (Declared Emergencies and Infectious Disease Emergencies)
 - ▶ Family Medical Leave
 - ▶ Organ Donor Leave
 - ▶ Reservist Leave
 - ▶ Time Off to Vote
 - ▶ Jury Duty
 - ▶ Family Caregiver Leave
 - ▶ Critical Illness Leave
 - ▶ Crime-Related Child Disappearance Leave
 - ▶ Child Death Leave
 - ▶ Domestic or Sexual Violence Leave
 - ▶ Sick Leave
 - ▶ Bereavement Leave
 - ▶ Family Responsibility

Effective March 19, 2020, retroactive to January 25, 2020

MATERNITY LEAVE:

Maternity leave is leave without pay. Biological or surrogate birth parents (the person who is away from work because they're pregnant or have recently given birth) are entitled to maternity leave of up to 17 weeks if they have been employed with the same employer for a period of 13 weeks immediately preceding the estimated date of delivery and, if eligible, may apply for Employment Insurance benefits.

- ▶ Maternity leave will be in accordance with the terms established by the laws of your province/territory. Leave commencing earlier than the legislated start date requires a health care professional's certificate.
- ▶ Under these terms, you are required to submit two (2) weeks' written notice and a health care professional's certificate, with an estimate of your delivery date, to your Manager prior to the proposed date you expect your leave to commence.
- ▶ You should inform us in writing as early as possible; however, so that we may plan for your absence.
- ▶ If you intend to return to work, you should inform the Manager of the anticipated date of return.
- ▶ You must have worked for the minimum qualifying period immediately preceding the estimated date of delivery to be eligible for maternity leave benefits through Employment Insurance.
- ▶ You will receive a "Record of Employment" with your final pay which must be submitted to Service Canada in order for you to receive maternity leave benefits. This can usually be done online (see www.canada.ca) or in person at a local Service Canada office.
- ▶ You may request that your accrued vacation pay be included with your final pay.
- ▶ Service Canada recommends applying for Employment Insurance benefits immediately following your last day at work. This can be done online or in person at a local Service Canada office. Delays in applying could jeopardize your entitlement to benefits.
- ▶ You may change the date the leave will end to an earlier date as long as you give at least four (4) weeks' written notice before the new earlier date. Further, you may change the date to a later date provided you give at least four (4) weeks written notice prior to the original return date.
- ▶ **Castle Building Centres Group Ltd.** reserves the right to refuse, in writing, a change in return date where you have not provided the required notice. This will be done at the time of the request or shortly thereafter.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.
- ▶ If you work while receiving maternity benefits, your earnings will be deducted dollar for dollar from your benefits.
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.

Effective January 1, 2018, Pregnancy Leave is available to an employee in the case of a stillbirth or miscarriage for up to 12 weeks, an increase from the existing entitlement of six (6) weeks.

PARENTAL/ADOPTION LEAVE:

Parental leave is leave without pay and may be shared between the parents, if desired. New parents are entitled to parental leave provided they have been employed with the same employer for a period of 13 weeks and, if eligible, may apply for Employment Insurance benefits.

- ▶ Parental leave will be in accordance with the terms established by the laws of your province/territory. An employee intending to take parental leave is entitled to a leave of absence of up to 61 weeks for a birth parent who has also taken a maternity/pregnancy leave beginning immediately after the end of their maternity/pregnancy leave, and up to 63 weeks for all other eligible employees and must, commence within 78 weeks of the day following the birth of a child or when the child first comes into the custody and care of the parent.
- ▶ You will receive a "Record of Employment" with your final pay which must be submitted to Service Canada in order for you to receive parental leave benefits. This can usually be done online or in person at a local Service Canada office.
- ▶ You may request that your accrued vacation pay be included with your final pay.
- ▶ Service Canada recommends applying for Employment Insurance benefits immediately following your last day at work. This can be done online or in person at a local Service Canada office. Delays in applying could jeopardize your entitlement to benefits.
- ▶ You must give the Manager written notice of the date the leave is to begin.
- ▶ In the case of an employee taking both maternity/pregnancy leave and parental leave, only one letter is required in advance of the start date of the maternity/pregnancy leave (if applicable).
- ▶ We would appreciate that you inform us in writing much earlier in order that we may plan for your absence.
- ▶ You may change the date the leave will end to an earlier date as long as you give at least four (4) weeks' written notice before the new earlier date. Further, you may change the date to a later date provided you give at least four (4) weeks written notice prior to the original return date.
- ▶ **Castle Building Centres Group Ltd.** reserves the right to refuse, in writing, a change in return date where you have not provided the required notice. This will be done at the time of the request or shortly thereafter.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.
- ▶ If you work while receiving parental benefits, there is a clawback after a set dollar amount/percentage of base salary earned. Contact your local Service Canada office for details.
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.

MATERNITY AND PARENTAL LEAVES • TO DO LIST

Individuals are entitled to Employment Insurance benefits if they are pregnant, have recently given birth, are adopting a child or are caring for their newborn baby. Their partner may also be entitled to parental benefits. The following "to do" list will help when you are applying for maternity or parental leaves:

- ▶ Confirm that you are covered by your provincial employment standards legislation.
- ▶ If you have worked continuously for **Castle Building Centres Group Ltd.** for the required amount of time, you should:
 - a. Obtain a medical certificate from a health care professional that certifies the pregnancy and the expected date of birth, or get proof of adoption in those jurisdictions where it is applicable.
 - b. Notify **Castle Building Centres Group Ltd.**, in writing, as to the time you expect to take your leave. Please specify both the dates you expect to leave and to return.
 - c. Some benefits require that you make a contribution in order for them to be active. Speak to the Vice President of Finance to ensure you have arranged to keep your coverage for those benefits that you wish to remain active.
 - d. Get your "Record of Employment" in order that you may apply for Employment Insurance benefits.
 - e. For prompt payment of Employment Insurance, you should contact the nearest Service Canada office at least 10 weeks prior to the expected date of your child's birth, so the necessary application forms can be obtained. These forms are also available online for convenience.
 - f. Apply for your Employment Insurance benefits as soon as your leave begins. There is a waiting period of one (1) week to process your claim.

SICK LEAVE:

Sick leave is leave without pay of up to three (3) days each calendar year which may be taken for reasons related to personal illness, injury, or medical emergency. All employees with at least two (2) consecutive weeks of employment are eligible for sick leave.

- ▶ You must inform the Manager as soon as possible that you will be taking sick leave. If you have to begin an emergency leave before you can notify the Manager, then you must contact them as soon as possible after starting the leave. **Castle Building Centres Group Ltd.** may require you to provide reasonable evidence that you are entitled to the leave.
- ▶ If you take only part of a day as sick leave, the day will be counted as a full day of leave; however, you will still be paid for any time you actually work.

Note: **Castle Building Centres Group Ltd.'s** company policy provides for sick days above the minimum legislated requirements. All sick days used under the company policy, whether paid or unpaid, are counted towards your legislated entitlement.

FAMILY RESPONSIBILITY LEAVE:

Family responsibility leave is leave without pay of up to three (3) days each calendar year which may be taken for the illness, injury, medical emergency or urgent matter relating to certain family members and dependent relatives. All employees with at least two (2) consecutive weeks of employment are eligible for family responsibility leave.

- ▶ Eligible family members include:
 - ▶ your spouse (includes a same-sex or common-law spouse);
 - ▶ a parent, step-parent or foster parent of yours or your spouse;
 - ▶ a child, step-child or foster child of yours or your spouse;
 - ▶ a grandparent, step-grandparent, grandchild or step-grandchild of yours or your spouse;
 - ▶ the spouse of your child;
 - ▶ your sibling; or
 - ▶ a relative who is dependent on you for care or assistance.
- ▶ You must inform the Manager as soon as possible that you will be taking family responsibility leave. If you have to begin a family responsibility leave before you can notify the Manager, then you must contact them as soon as possible after starting the leave. **Castle Building Centres Group Ltd.** may require you to provide reasonable evidence that you are entitled to the leave.
- ▶ If you take only part of a day as family responsibility leave, the day will be counted as a full day of leave; however, you will still be paid for any time you actually work.

Note: Castle Building Centres Group Ltd.'s company policy provides for sick days related to family members above the minimum legislated requirements. All sick days used under the company policy, whether paid or unpaid, are counted towards your legislated entitlement.

BEREAVEMENT:

All bereavement days used by an employee under this provision are counted towards any days that an employee is entitled to under governing employment legislation.

- ▶ You will be allowed **three (3) working days off with pay** for the purpose of attending the funeral of one of the following immediate family members:

▶ Spouse (includes a same-sex or common-law spouse)	▶ Brother/Sister	▶ Mother/Father-in-law (current)
▶ Parent/Step Parent	▶ Grandchild	▶ Son/Daughter-in-law
▶ Child/Step Child	▶ Ward/Guardian	

- ▶ You will be allowed **two (2) working days off with pay** for the purpose of attending the funeral of:

▶ Grandparent	▶ Sister/Brother-in-law	▶ Aunt, Uncle, 1 st Cousin
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- ▶ You will be allowed **two (2) working days off without pay** for the purpose of attending the funeral of a relative who is dependent on you for care or assistance or any other eligible family member prescribed under governing legislation.

- ▶ If you wish to attend the funeral of other relatives or friends, you may, with the approval of the Manager, take up to one (1) day off without pay .
- ▶ You must inform the Manager as soon as possible that you will be taking bereavement leave. If you have to begin a bereavement leave before you can notify the Manager, then you must contact them as soon as possible after starting the leave. **Castle Building Centres Group Ltd.** may require you to provide reasonable evidence that you are entitled to the leave.
- ▶ If you take only part of a day as bereavement leave, the day will be counted as a full day of leave; however, you will still be paid for any time you actually work.

Note: Bereavement pay will not be paid in addition to another type of allowable pay for the same day(s), such as holiday pay, vacation pay or other days that you would not normally have performed work for the Company.

Note: **Castle Building Centres Group Ltd.'s** company policy provides for bereavement days above the minimum legislated requirements. All bereavement days used under the policy, whether paid or unpaid, are counted towards your legislated entitlement.

FAMILY MEDICAL LEAVE (COMPASSIONATE CARE BENEFITS):

According to provincial legislation, **Castle Building Centres Group Ltd.** provides family leaves of absence without pay to all employees who wish to take time off from work duties to fulfill family obligations.

- ▶ Family medical leave is unpaid, job-protected leave of up to 28 weeks in a 52-week period.
- ▶ Family medical leave may be taken to provide care or support to a specified family member for whom a qualified health practitioner has issued a certificate indicating that the family member has a serious medical condition and there is a significant risk of death occurring within a period of 26 weeks.
- ▶ Although two or more employees may qualify for the leave, the 28 weeks of leave must be shared among the employees (this only applies when it involves the same family member).
- ▶ All employees are entitled to family medical leave and must inform their Manager in writing as soon as possible that they will be taking the leave.
- ▶ Under the *Employment Insurance Act*, up to 26 weeks of Employment Insurance (EI) benefits called "compassionate care benefits" may be paid to EI eligible employees who have to be away from work temporarily to provide care to a family member who has a serious medical condition with a significant risk of death within 26 weeks and who requires care or support from one or more family members.
- ▶ Employees wishing to take a family medical leave must provide their Manager, if requested, with a completed copy of the Compassionate Care Benefits Attestation form, available at the Service Canada Website.
- ▶ The specified family members for whom a family medical/compassionate care/bereavement leave may be taken are:
 - ▶ your spouse (including same-sex spouse or common-law partner)
 - ▶ a parent (including step, in-law, or foster) of yours or your spouse
 - ▶ a child (including step, in-law, or foster) of yours or your spouse
 - ▶ a sibling (including step and in-law) of yours
 - ▶ a grandparent or step-grandparent of yours or your spouse

- ▶ a grandchild or step-grandchild of yours or your spouse
 - ▶ the spouse of your current or former foster child, current or former guardian, grandchild, uncle, aunt, nephew or niece
 - ▶ the current or former guardian of yours
 - ▶ the current or former ward of yours or your spouse
 - ▶ an aunt, uncle, niece, or nephew of yours or your spouse
 - ▶ any person who considers you to be (or who you consider to be) like a close relative
 - ▶ or any individual prescribed under current or future legislation
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.
 - ▶ So that your return to work can be properly scheduled, you are required to provide your Manager with at least two (2) weeks' advance written notice of the date you intend to return to work from the family leave.
 - ▶ When a family medical leave ends, you will be reinstated to the same position, if it is available, or to an equivalent position for which you are qualified.
 - ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation and your employment will be terminated.

ORGAN DONOR LEAVE:

Under the Ontario *Employment Standards Act*, Organ Donor Leave is a job-protected, unpaid leave that is available to a person who is donating all or part of the following organs to another person: their kidney, liver, lung, pancreas, small bowel or any other organ prescribed by future legislation.

- ▶ An employee who undergoes surgery for the purpose of organ donation is entitled to take leave for the period prescribed by legislation or, if no period is prescribed, for up to 13 weeks.
- ▶ In order to be eligible for leave, an employee must have completed at least 13 consecutive weeks of employment with **Castle Building Centres Group Ltd.**, or other minimum period of employment, as prescribed by future legislation.
- ▶ An employee may be required to provide a medical certificate in support of their entitlement to the leave if we request one.
- ▶ The employee would be entitled to extend the leave for an additional period of up to 13 weeks (i.e., the total length of leave could be up to 26 weeks) if a medical certificate confirms that the employee is not yet able to perform their duties on the date the leave is due to end.
- ▶ An employee would have to provide at least two (2) weeks' written notice before starting the leave or, if such notice is not possible in the circumstances, provide notice as soon as possible.
- ▶ The leave would normally begin on the day that the surgery to donate the organ takes place. If needed, an employee may begin the leave at an earlier time as specified in a medical certificate. (The length of the leave to which a donor would be entitled would remain the same regardless of when it began.)
- ▶ The employee may end the leave earlier by giving **Castle Building Centres Group Ltd.** written notice at least two (2) weeks before the day the employee wishes to end the leave.

- ▶ **Castle Building Centres Group Ltd.** paid contributions to the Company Benefit Plan will continue throughout the duration of the Organ Donor Leave, provided the employee in question continues to pay their contributions to the Plan, if applicable.
- ▶ An employees' seniority and length of service credits will continue to accumulate during the period of the Organ Donor Leave.

EMERGENCY LEAVE (DECLARED EMERGENCIES AND INFECTIOUS DISEASE EMERGENCIES):

Emergency Leave (Declared Emergencies and Infectious Disease Emergencies) is an unpaid, job-protected leave for employees in Ontario. It may be taken in the case of an emergency declared by the province or other prescribed reasons such as quarantine or to provide care, assistance or support to specified individuals resulting from a designated infectious disease.

- ▶ You are entitled to take a leave for as long as you are not performing the duties of your position because of a declared emergency, an infectious disease emergency, or such other reasons as prescribed.
- ▶ You must inform the Manager as soon as possible that you will be taking an emergency leave of absence. If you have to begin an emergency leave before you can notify the Manager, then you must contact them as soon as possible after starting the leave.
- ▶ **Castle Building Centres Group Ltd.** may require you to provide evidence reasonable in the circumstances, at a time that is reasonable in the circumstances, that you are entitled to the leave. Such evidence will not include a certificate from a qualified health practitioner.
- ▶ If you take only part of a day as emergency leave, the day will be counted as a full day of leave; however, you are still paid for any time you actually work.

RESERVIST LEAVE:

Under the Ontario *Employment Standards Act, 2000*, Reservist Leave is a job-protected, unpaid leave for military reservists serving on certain domestic operations, such as search and rescue operations or national disasters such as flood relief or ice storms, participating in Canadian Armed Forces military skills training as well as for international deployments, or the employee is in treatment, recovery or rehabilitation in respect of a physical or mental health illness, injury or medical emergency that results from participation in an operation or activity. In the case of international operations this would include any pre-deployment (training) or post-deployment activities required by the Canadian Forces.

- ▶ Employees must have completed at least two (2) consecutive months of employment with **Castle Building Centres Group Ltd.**, or other minimum period of employment, as prescribed by current or future legislation.
- ▶ Employees must provide their Manager with as much notice as possible in the circumstances. This notice must be in writing and include the departure and return dates, if known.
- ▶ **Castle Building Centres Group Ltd.** may request evidence confirming that an employee is a member of the Reserves, is required for service, and where possible, the start and end dates for the period of service.
- ▶ Your participation in pension and benefit plans would cease for the duration of the leave. Seniority and length of service credits would continue to accumulate during the leave.
- ▶ In the case of emergency operations, employees must notify **Castle Building Centres Group Ltd.** as soon as possible after being called upon by the military to participate in the operation, using those procedures laid down for reporting unexpected absences from work.

TIME OFF TO VOTE:

Castle Building Centres Group Ltd. encourages all eligible employees to participate in the election of government leaders at all levels and will help coordinate schedules so that all those who wish to vote will have time.

- ▶ The *Canada Elections Act* requires that anyone eligible to vote in a federal election must have three (3) consecutive hours to vote. If necessary, you will be granted sufficient time off work, at full pay, to allow up to three (3) consecutive hours to vote. Provincial and municipal elections may vary, depending on location.
 - ▶ If you require time off to vote, you must inform the Manager before the Election Day so that the necessary time off can be scheduled at the beginning or end of the working day.
 - ▶ The Company will pay you up to a maximum of three (3) hours at regular pay. Time taken does not need to be made up.

For example, if you live in an electoral district in which the hours for voting are 9:30 a.m. to 9:30 p.m., and your hours of work are 11:00 a.m. to 7:00 p.m., your hours of work will not allow three (3) consecutive hours for voting. **Castle Building Centres Group Ltd.** might allow you to arrive late (at 12:30 p.m.), to leave early (at 6:30 p.m.), or provide you three (3) hours off at some other point during the workday in order to allow you the opportunity to exercise the right to vote.

As another example, if you live in an electoral district in which voting hours are from 8:30 a.m. to 8:30 p.m., and your hours of work are between 9:00 a.m. and 5:00 p.m., **Castle Building Centres Group Ltd.** is not required to provide you time off for the purpose of voting, because you will already have available three and a half consecutive hours for voting (from 5:00 p.m. to 8:30 p.m.).

- ▶ At the provincial level, the *Ontario Election Act* requires that eligible voters be provided with three (3) consecutive hours off work to vote in a provincial election during polling hours. Under the *Election Act*, an employer has the right to grant time off to vote at a time that is convenient for the employer. Similar provisions exist with regard to municipal elections under the *Municipal Elections Act, 1996*.

JURY DUTY:

Castle Building Centres Group Ltd. encourages employees to fulfill their civic responsibilities by serving jury duty when required.

- ▶ To be eligible for remuneration from the Company, you must have successfully completed your probationary period. All employees are entitled to take job-protected leave when called upon to exercise their responsibilities as jurors.
- ▶ On the condition that all monies paid to you by the Court will be signed over to the Company, you will receive payment equivalent to your regular daily rate up to a maximum of six (6) weeks.
- ▶ You must show the jury duty summons to your Manager as soon as possible so that Management may make arrangements to accommodate your absence.
- ▶ You are expected to report for work whenever the court schedule permits.
- ▶ Either you or the Company may request an excuse from jury duty if, in **Castle Building Centres Group Ltd.'s** judgement, your absence would create serious operational difficulties or undue financial hardship to you.

Castle Building Centres Group Ltd. will continue to provide insurance benefits for the full term of your absence while on Jury duty. Vacation, sick leave, and holiday benefits, will continue to accrue during jury duty leave.

FAMILY CAREGIVER LEAVE:

Under the Ontario Employment Standards Act, **Castle Building Centres Group Ltd.** provides a family caregiver leave of absence without pay to all qualifying employees to provide care or support to family members if a qualified health practitioner issues a certificate stating that the individual has a serious medical condition.

- ▶ Family caregiver leave is unpaid, job-protected leave of up to eight (8) weeks in a calendar year. Any part week of leave is counted as one (1) week of leave.
- ▶ Family caregiver leave may be taken to provide care or support to a specified family member for whom a qualified health practitioner has issued a certificate indicating that the family member has a serious medical condition (a serious medical condition may include a condition that is chronic or episodic).
- ▶ If requested, you must provide **Castle Building Centres Group Ltd.** with a copy of the health practitioner's certificate.
- ▶ All employees are entitled to family caregiver leave and must inform their Manager in writing as soon as possible that they will be taking the leave.
- ▶ The specified family members for whom a family caregiver leave may be taken are:
 - ▶ your spouse (including same-sex spouse or common-law partner);
 - ▶ a parent (including step or foster) of yours or your spouse;
 - ▶ a child (including step or foster) of yours or your spouse;
 - ▶ a grandparent or grandchild (including step) of yours or your spouse;
 - ▶ the spouse of a child of yours;
 - ▶ your sibling;
 - ▶ a relative of yours who is dependent on you for care or assistance; or
 - ▶ any individual prescribed as a family member for the purpose of the legislation.
- ▶ So that your return to work can be properly scheduled, you are required to provide your Manager with at least two (2) weeks' advance written notice of the date you intend to return to work from the family caregiver leave.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation and your employment will be terminated.
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.

LEAVE RELATED TO CRITICAL ILLNESS:

Employees who have completed six (6) months of uninterrupted service may be absent from work, without pay, to care for or support a critically ill or injured family member as follows:

- a) up to 37 weeks to care for critically ill child (under 18 years of age), or
- b) up to 17 weeks to care for critically ill adult.
 - ▶ While this leave is unpaid, employees on leave due to a family members' critical illness or injury may be eligible to receive Family Caregiver benefits.
 - ▶ If the family member's health gets worse, caregivers could be eligible to combine the caregiving benefit with the compassionate care benefit. Please contact your nearest Service Canada office for further information.
 - ▶ You must notify **Castle Building Centres Group Ltd.** as soon as possible of the absence and the reasons therefore.
 - ▶ At the end of a leave related to critical illness or injury of a family member, you will be reinstated to your usual position; or a comparable job, with the same benefits, including the wage to which you would have been entitled had you remained at work.
 - ▶ If your usual position no longer exists, the Company will grant you all of the rights and privileges that you would have enjoyed at the time the position disappeared.
 - ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.
 - ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.

CHILD DEATH LEAVE:

Employees who have completed six (6) months of uninterrupted service may be absent from work, without pay, for up to 104 weeks if a child of the employee dies.

"CHILD" means a child, step-child, foster child or child who is under legal guardianship, and who is under 18 years of age.

"CRIME" means an offence under the *Criminal Code* (Canada), other than an offence prescribed by the regulations made under paragraph 209.4 (f) of the *Canada Labour Code* (Canada);

"WEEK" means a period of seven consecutive days beginning on Sunday and ending on Saturday.

- ▶ An employee is not entitled to a child death leave if the employee is charged with a crime in relation to the death of the child or if it is probable, considering the circumstances, that the child was a party to a crime in relation to their death.
- ▶ Child death leave can only be taken in one single period within 105 weeks after the child dies.
- ▶ Although two or more employees may qualify for the leave, the 104 weeks of leave must be shared among the employees (this only applies when it involves the same family member or event).

- ▶ You must inform your Manager as soon as possible, in writing, indicating the weeks in which you will be taking the leave. If you have to begin the leave before you can notify your Manager, then you must contact them as soon as possible after starting the leave.
- ▶ Any requested changes to a child death leave must be communicated, in writing, to your Manager at least four (4) weeks' in advance of the proposed change. **Castle Building Centres Group Ltd.** will consider your request and advise you in writing whether permission has been granted.
- ▶ **Castle Building Centres Group Ltd.** may require you to provide reasonable evidence that you are entitled to the leave.
- ▶ At the end of the leave, you will be reinstated to your usual position; or a comparable job, with the same benefits, including the wage to which you would have been entitled had you remained at work.
- ▶ If your usual position no longer exists, the Company will grant you all of the rights and privileges that you would have enjoyed at the time the position disappeared.
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.

Additional information regarding eligibility, etc. is available by contacting the Vice President of Finance.

CRIME-RELATED CHILD DISAPPEARANCE LEAVE:

Employees who have completed the required period of uninterrupted service may be absent from work, without pay, for up to 104 weeks in the case of a disappearance of a child, resulting directly from the probable commission of a criminal offence.

- ▶ While this leave is unpaid, employees on leave following the disappearance of their child due to the commission of a criminal offence may be eligible to receive special Parents of Murdered or Missing Children (PMMC) benefits. Please contact your nearest Service Canada office for further information.
- ▶ You must notify your Manager as soon as possible of the absence and provide supporting documentation, if requested.
- ▶ At the end of the leave, you will be reinstated to your usual position; or a comparable job, with the same benefits, including the wage to which you would have been entitled had you remained at work.
- ▶ If your usual position no longer exists, the Company will grant you all of the rights and privileges that you would have enjoyed at the time the position disappeared.
- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.

DOMESTIC OR SEXUAL VIOLENCE LEAVE:

Employees who have completed at least 13 consecutive weeks of uninterrupted service may be absent from work if the employee or a child of the employee experiences domestic or sexual violence, or the threat of domestic or sexual violence, and the leave of absence is taken for any of the following purposes:

- 1) To seek medical attention for the employee or the child of the employee in respect of a physical or psychological injury or disability caused by the domestic or sexual violence.
- 2) To obtain services from a victim services organization for the employee or the child of the employee.
- 3) To obtain psychological or other professional counselling for the employee or the child of the employee.
- 4) To relocate temporarily or permanently.
- 5) To seek legal or law enforcement assistance, including preparing for or participating in any civil or criminal legal proceeding related to or resulting from the domestic or sexual violence.
- 6) Such other purposes as may be prescribed under governing employment legislation.

“CHILD” means a child, step-child, foster child or child who is under legal guardianship, and who is under 18 years of age.

“WEEK” means a period of seven consecutive days beginning on Sunday and ending on Saturday.

- ▶ If the domestic or sexual violence is committed by the employee, the employee is not eligible to take domestic or sexual violence leave.
- ▶ Eligible employees may take domestic or sexual violence leave for:
 - a. up to 10 days of leave each calendar year; and
 - b. up to 15 weeks of leave each calendar year.
- ▶ The first five (5) days of leave in each calendar year will be paid and the remainder of the leave days being unpaid.
- ▶ You must inform your Manager as soon as possible, in writing, that you will be taking a domestic or sexual violence leave of absence. If you have to begin the leave before you can notify the Manager, then you must contact them as soon as possible after starting the leave.
- ▶ If you take only part of a day as leave, the day will be counted as a full day of leave; however, you are still paid for any time you actually work.
- ▶ If you take any part of a week as leave, the week will be counted as a full week of leave; however, you are still paid for any time you actually work.
- ▶ If a paid day of leave under this section falls on a day or at a time of day when overtime pay, a shift premium, or both would be payable; you are not entitled to more than your regular rate for any paid days of leave (i.e., shift premium, public holiday premium, etc.).
- ▶ **Castle Building Centres Group Ltd.** may require you to provide evidence reasonable in the circumstances that you are entitled to the leave. Confidentiality will be maintained at all times unless disclosure is required by law or otherwise permitted.
- ▶ At the end of the leave, you will be reinstated to your usual position; or a comparable job, with the same benefits, including the wage to which you would have been entitled had you remained at work.
- ▶ If your usual position no longer exists, the Company will grant you all of the rights and privileges that you would have enjoyed at the time the position disappeared.

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- ▶ While on leave, you will continue to receive Company benefits in accordance with governing employment legislation. Any employee contributions (i.e., cost-sharing of premiums) must be remitted to the Company during your leave. Continued coverage will be subject to legislative requirements, in addition to the terms, conditions and limitations of the benefit carrier.
 - ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.
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Note: Domestic or sexual violence leave pay will not be paid in addition to another type of allowable pay for the same day(s), such as holiday pay, vacation pay or other days that you would not normally have performed work for the Company.

LEGISLATED LEAVES OF ABSENCE QUICK REFERENCE:

Province	Type	Qualifying Period	Length of Leave	Extension(s)	Required Notice
ON	Maternity	13 wks	17 wks	None	2 wks
	Parental	13 wks	63 wks ⁽¹⁾		2 wks
	Reserve Forces	2 mths ⁽⁵⁾	As Needed		ASAP
	Emergency Leave (Declared Emergencies and Infectious Disease Emergencies)	None	As Mandated		ASAP
	Family Medical Leave	None	28 wks/yr		ASAP
	Organ Donor Leave	13 wks	13 wks	13 wks	2 wks
	Family Caregiver Leave	None	8 wks		ASAP
	Critical Illness Leave	6 mths ⁽⁵⁾	37 wks for child 17 wks for adult ⁽²²⁾		ASAP
	Crime-Related Child Disappearance Leave	6 mths ⁽⁵⁾	Up to 104 wks		ASAP
	Child Death Leave	6 mths ⁽⁵⁾	Up to 104 wks ⁽²⁵⁾		ASAP
	Domestic or Sexual Violence Leave	13 wks	Up to 10 days/15 wks (first 5 paid)		ASAP
	Sick Leave (Personal Illness/Injury/Medical Emergency)	2 wks	Up to 3 unpaid days/year		ASAP
	Family Responsibility Leave	2 wks	Up to 3 unpaid days/year		ASAP
Bereavement Leave	2 wks	Up to 2 unpaid days/year		ASAP	

Effective October 26, 2023

Footnotes:

(1) Up to 61 weeks if Maternity Leave taken. Total length of combined leave cannot exceed 78 weeks.

(5) Must be consecutive.

(22) Up to 37 weeks to care for critically ill child, up to 17 weeks to care for critically ill adult.

(24) If, during the period of 17 weeks following the date of confinement, the child who was born is hospitalized, the period is extended by the number of weeks during which the child is hospitalized; subject to limitations.

(25) Up to 104 weeks if child dies for any reason.

EMPLOYMENT INSURANCE BENEFITS:

Service Canada is responsible for administering Employment Insurance benefits in Ontario. As a result, the following policy may change from time to time due to changes in criteria implemented by the Department of Employment and Social Development.

- ▶ Employment Insurance Benefits are available to eligible employees as per the following:
 - ▶ Maternity Benefits - the person who is away from work because they're pregnant or have recently given birth
 - ▶ Parental Benefits - parents of a newborn or newly adopted child
 - ▶ Sickness Benefits - people who are unable to work for medical reasons (medical reasons include illness, injury, quarantine or any medical condition that prevents you from working)
 - ▶ Compassionate Care Benefits - people who have to be away from work temporarily to provide care or support to a family member who is gravely ill with a significant risk of death
 - ▶ Parents of Murdered or Missing Children (PMMC) Benefits – compassionate leave for parents of children who were murdered or disappeared as a result of a crime
 - ▶ Family Caregiver Benefit for Children (previously known as Parents of Critically Ill Children (PCIC) Benefits) – people who need to take time off work to care for their critically ill or injured children
 - ▶ Family Caregiver Benefit for Adults - Effective December 3, 2017, for people who need to take time off work to care for their critically ill or injured adult
- ▶ To be eligible for the above E.I. benefits you must meet the following requirements:
 - ▶ must apply for benefits;
 - ▶ must have paid into the E.I. account; and
 - ▶ must have worked the required number of hours.
- ▶ Individuals are entitled to Employment Insurance benefits if they are pregnant, have recently given birth, are adopting a child or are caring for their newborn baby. Their partner may also be entitled to parental benefits.
- ▶ A maximum of 15 weeks of maternity benefits are payable only to the gestational parent in a period immediately surrounding the birth of the child. To be eligible, you will need 600 hours of insured work in the last 52 weeks.
- ▶ Effective March 17, 2019, maximum parental benefits of:
 - a. STANDARD BENEFITS: Up to 40 weeks, but one parent cannot receive more than 35 weeks of standard benefits (which means that each parent must take at least five (5) weeks of the leave); or
 - b. EXTENDED BENEFITS: Up to 69 weeks, but one parent cannot receive more than 61 weeks of extended benefits (which means that each parent must take at least eight (8) weeks of the leave).

Note: The length of legislated parental leave is in accordance with governing employment legislation.

- ▶ Both you and your partner (if sharing parental benefits) will each need 600 hours of insured work in the last 52 weeks to be eligible.
- ▶ The rate and duration of benefits will not be different in the case of a multiple birth or the adoption of more than one child.
- ▶ The person who is away from work because they're pregnant or have recently given birth may apply for parental benefits at the same time as they apply for maternity benefits.
- ▶ A combination of maternity (gestational parent only), regular parental and sickness benefits can be received up to a combined maximum of 50 weeks in a 52-week benefit period. The maximum combination of benefits under the extended parental benefits option for eligible parents is 76 weeks in a 78-week benefit period for any one parent.

COMPANY LEAVES OF ABSENCE:

Sometimes unexpected events keep you from attending work as you normally would. In these circumstances, you may be eligible for emergency time off. These Leave(s) of Absence are designed so that if you are having problems, you may request time away from work and still have a job waiting for you when you return. Some of the leaves of absence referred to in this section are privileges and not rights.

Conditions:

- ▶ The countdown of days granted for these leaves of absence starts on the day on which the event occurs and extends to include the number of days stated. These days are consecutive. If a weekend or Statutory Holiday occurs within the period, they will be included in the stated number of days.

WEDDING DAY:

- ▶ You may take **one (1) day off with pay**, on the day of your wedding if the wedding occurs during a working day.
- ▶ For the wedding of your child, sibling, parent or for the wedding of your spouse's or partner's sibling, child, parent, you may take **one (1) day without pay**, on the date of the wedding, provided the wedding is on a working day.

EDUCATIONAL LEAVE:

Castle Building Centres Group Ltd. provides educational leaves of absence without pay to eligible employees who wish to take time off from work duties to pursue course work that is applicable to their job duties.

- ▶ Only full-time employees are eligible to request educational leave as described in this policy.
- ▶ Requests will be evaluated based on a number of factors, including your work record, anticipated workload requirements and staffing considerations during the proposed period of absence.
- ▶ Group health benefits will be provided by **Castle Building Centres Group Ltd.** until the end of the month in which the approved educational leave begins. At that time, you will become responsible for the full costs of these benefits if you wish coverage to continue, subject to the terms, conditions, and limitations of the benefits carrier.

- ▶ When you return from educational leave, benefits will again be provided by the Company according to the applicable plans.
- ▶ Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon your return to active employment.
- ▶ When an educational leave ends, every reasonable effort will be made to return you to the same position, if it is available, or to a similar available position for which you are qualified; however, the Company cannot guarantee reinstatement in all cases.
- ▶ Failure to report to work promptly at the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.

Eligible employees, who have completed 90 calendar days of service, may request educational leave for a period of up to nine (9) months.

PERSONAL LEAVE:

Beyond leaves that are required by law, the Company also provides personal leaves of absence, without pay, to all eligible employees who wish to take time off from work duties to fulfill personal obligations.

- ▶ As soon as you become aware of the need for a personal leave of absence, you should request a leave from the Manager.
- ▶ Personal leave may be granted for a period of up to 30 calendar days every five (5) years.
- ▶ If this initial period of absence proves insufficient, consideration will be given to a written request for a single extension of no more than 30 calendar days.
- ▶ With Management approval, you may take any available sick leave or vacation leave as part of the approved period of leave.
- ▶ Requests for personal leave will be evaluated based on a number of factors, including your work record, anticipated workload requirements and staffing considerations during the proposed period of absence.
- ▶ Group health benefits will be provided by **Castle Building Centres Group Ltd.** until the end of the month in which the approved personal leave begins. At that time, you will become responsible for the full costs of these benefits if you wish coverage to continue, subject to the terms, conditions, and limitations of the benefits carrier.
- ▶ When you return from a personal leave, benefits will again be provided by the Company according to the applicable plans.
- ▶ Benefit accruals, such as vacation pay, sick leave, or holiday benefits, will be suspended during the leave and will resume upon your return to active employment.
- ▶ When a personal leave ends, every reasonable effort will be made to return you to the same position, if it is available, or to a position of equivalent pay for which you are qualified; however, the Company cannot guarantee reinstatement in all cases.
- ▶ A letter of intent to return to work must be signed and approved by your Manager before the leave may begin.
- ▶ Failure to report to work within three (3) days following the expiration of the approved leave period (without appropriate notification) will be deemed a voluntary resignation, and your employment will be terminated.

CITIZENSHIP LEAVE:

Up to **one (1) day off with pay** will be granted if you are absent from work in order to attend your own swearing-in ceremony as a new Canadian citizen.

- ▶ To be eligible for paid leave, you must have successfully completed your probationary period.

MEDICAL LEAVE:

Through our benefits provider, **Castle Building Centres Group Ltd.** provides paid medical leaves of absence for short-term and long-term disability to eligible employees who are temporarily unable to work due to a serious health condition or disability.

- ▶ For the purposes of this policy, serious health conditions/disabilities include:
 - ▶ in-patient care in a hospital, hospice, or residential medical care facility;
 - ▶ continuing treatment by a health care professional; and
 - ▶ temporary disabilities associated with pregnancy, childbirth, and related medical conditions.
- ▶ All employees are eligible to request medical leave as described in this policy.
- ▶ You should make requests for medical leave to the Manager at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.
- ▶ A health care professional's statement must be submitted verifying the need for medical leave and its beginning and expected ending dates. You should promptly report any changes in this information to the Company.
- ▶ If you are returning from medical leave, you must submit a health care professional's verification of your fitness to return to work.
- ▶ If you sustain a work-related injury, you are eligible for a medical leave of absence for the period of disability in accordance with all applicable laws covering occupational disabilities.
- ▶ You may request that your accrued vacation pay be included with your final pay.
- ▶ A "Record of Employment" (ROE) will be issued along with your final pay.
- ▶ All accruals will be suspended during the leave and will resume upon your return to active employment.

PERFORMANCE MANAGEMENT:

At **Castle Building Centres Group Ltd.**, we believe in encouraging you to perform to the best of your abilities and to develop your full potential through an objective, ongoing and participatory performance management process.

- ▶ Our success depends on your performance. Your Manager will set out performance expectations and will give you regular feedback about how you are doing.

MANAGING PERFORMANCE:

The purposes of managing performance are to:

- ▶ clarify job descriptions, work goals and performance standards;
- ▶ provide feedback on performance and results;
- ▶ identify and discuss improvements to your performance and results;
- ▶ establish work goals that are endorsed by both you and your Manager; and
- ▶ promote career development by discussing long-range plans for your development and progression through the organization.

PERFORMANCE APPRAISAL PROCEDURE

- ▶ Formal performance appraisals are performed annually for those that have been employed at least nine (9) months.
- ▶ Appraisals may also be performed when starting a new position, at the end of the three (3) month probationary period or as determined by the Manager.
- ▶ The appraisal meeting is for you and your Manager to discuss your performance over the previous review period and to establish objectives for the next review period. The focus will be on several issues:
 - ▶ your evaluation of your own performance and accomplishments over the review period in comparison with the previously established duties/performance objectives and goals;
 - ▶ your Manager's evaluation of your performance against mutually agreed-upon objectives; and
 - ▶ an opportunity to discuss how you and your Manager can achieve even better performance.
- ▶ This includes an agreement on what your duties/performance objectives and goals will be for the next timeframe and the establishment of a personal development plan.
- ▶ An appraisal form is used to facilitate and record the formal discussion. However, the resulting dialogue between you and your Manager is even more important.
- ▶ Only through a frank discussion will you both be able to identify and agree upon how well you have fulfilled your job requirements, what areas of work you excel in and what areas require improvement.
- ▶ Both you and your Manager will sign and receive a copy of the form with one copy going in your employee file. If you wish, you may make personal comments on the appraisal form and this, in turn, becomes part of the record.
- ▶ It is important to note that signing the performance appraisal does not mean you agree with the appraisal. It simply confirms that the discussion took place.

Should you have any questions or concerns, please contact the Vice President of Finance.

ONGOING PERIODIC DISCUSSION:

Appraising your performance is an ongoing process and not restricted to just once a year. You and your Manager should discuss your work and your progress at regular intervals throughout the year.

- ▶ These informal discussions are the key to removing any doubt and misunderstanding and to prevent serious problems from arising.
- ▶ During these discussions, you and your Manager are free to modify the duties/goals if changes in your needs or the needs of the Company make this necessary.

PROGRESSIVE DISCIPLINE:

Progressive discipline is a process for dealing with job-related behaviour that does not meet expected and communicated performance standards. The primary purpose for progressive discipline is to assist you in understanding that a performance problem or opportunity for improvement exists.

- ▶ At **Castle Building Centres Group Ltd.**, we will follow a pattern of progressive discipline for a serious infraction, including those against the Company, Management, a member or co-worker.

This will consist of a 4-step process:

1. **Verbal Counselling Session** - This meeting is designed for you and your Manager to discuss the incident, the reasons for its occurrence and explore possible solutions.
2. **Written Warning Report** - Provides a summary of the incident, a review of any verbal counseling meetings, an action plan with timelines and next steps.
3. **Second Written Warning Report** - Provides a follow-up to the initial written warning, with strict action plan, timelines and further consequences.
4. **Termination** - Managers are required to work closely with the Vice President of Finance when planning any terminations.

Employees are cautioned that a very serious breach of discipline amounting to gross misconduct will result in immediate termination of employment (without notice or warning), or some other disciplinary action other than that outlined above. Gross misconduct generally includes, but is not limited to, the following:

- ▶ extremely insubordinate or insolent behaviour;
- ▶ theft;
- ▶ fraud;
- ▶ violence;
- ▶ harassment; and
- ▶ conduct that would have the effect of bringing **Castle Building Centres Group Ltd.** into disrepute.

WHEN INVOLVING SAFETY VIOLATIONS:

At **Castle Building Centres Group Ltd.**, nothing is more important to us than the continued health, safety and well-being of our employees, contractors, members and visitors. For this reason, we take health and safety concerns very seriously. Specifically, serious contraventions of our Health and Safety Policy, as well as any horseplay or careless, reckless, insubordinate or dangerous conduct that has the potential to endanger the health and safety of yourself or others will not be tolerated. Therefore, serious health and safety infractions may justify progressive discipline which go beyond the initial levels in the Progressive Discipline Scale, possibly up to and including termination of employment.

Such discipline will be at the discretion of Management, based on discussions with the Vice President of Finance regarding the incident. Where we feel this type of discipline is warranted, all facts will be carefully reviewed and you will be given a full opportunity to explain your conduct before any decision is reached. All discipline levels followed will be documented and a copy will be kept in your employee file.

DOCUMENTED DISCIPLINE REPORTS:

At **Castle Building Centres Group Ltd.**, it is important that any employee who receives a warning, but who improves thereafter, not be constantly in fear of further disciplinary action based on antiquated reports. As a result, the following guidelines should be followed:

- ▶ It is important to remember that the purpose of issuing "written warnings" is not to precipitate your termination, but to:
 - ▶ inform you that you are not meeting the required standards of employment;
 - ▶ formally recommend procedures that must be followed; and
 - ▶ formally relate the consequences to you if these recommendations are not followed within a specified timeline.

Although a written warning which is more than a year old shall remain a part of your permanent employee record, it shall not be used as a basis for future disciplinary action, except written warnings which are issued for attendance and safety violations.

TERMINATION OF EMPLOYMENT:

At **Castle Building Centres Group Ltd.**, we are committed to giving you a completely fair opportunity to fulfill the requirements of your position and to terminate employment only when there is no alternative course of action. Should that step become necessary, we will abide by the governing employment legislation.

- ▶ For permanent and part-time employees, in situations other than termination for just cause, **Castle Building Centres Group Ltd.** will either offer the advance period of notice of termination required by law or, at its discretion, compensation in lieu thereof. Should you still be in your probationary period, no advance notice or compensation in lieu will apply.

RESIGNATION:

At **Castle Building Centres Group Ltd.**, if you wish to terminate your employment, we request that you submit a written, signed resignation letter to your immediate Manager.

- ▶ The resignation letter should include the effective date your employment will cease.
- ▶ The Company requests that you provide at least two (2) weeks' notice prior to the date that employment will cease.
- ▶ The Company may request that you remain for a longer period of time (depending upon the situation).
- ▶ Your Manager may accept the notice as offered and request that you work throughout the notice period. Alternatively, under certain circumstances we may elect to pay you for all or part of your notice period and not require you to report to work during that time (in particular, this applies where an employee is leaving us in order to join a direct competitor).

RETIREMENT:

If you are planning to retire, we request that you discuss such matters with your Manager no later than one (1) year before the intended date. This will allow the Company time to plan for the vacancy.

- ▶ Approximately six (6) months prior to your retirement date, the necessary pension data and options available will be provided to you.

REFERENCES:

At **Castle Building Centres Group Ltd.**, we recognize that some of our employees will eventually wish to leave the Company in order to pursue opportunities elsewhere. While we are always sad to see valuable employees leave our Company, we wish those individuals all the best in their future endeavours. When employees do move on, they would normally leave with the expectation that **Castle Building Centres Group Ltd.** would be able to provide a satisfactory reference so that they can secure new employment.

- ▶ References are an important part of the selection process used by most organizations, including our own. We employ reference checks as a means of obtaining or substantiating information about the candidates we hire for positions with our Company. Therefore, we understand that other organizations will occasionally want to contact us to obtain references for our departing or former employees. As a courtesy to those individuals, we agree to provide references, subject to the following restrictions and guidelines. Any information provided is conditional upon the receipt of consent of the individual concerned, either from that person directly or from the prospective employer.
- ▶ All requests for references should be directed to the Vice President of Finance. If that person is unavailable, the former employee's manager-once-removed can be contacted in their absence. Wherever possible, the person providing a reference for a former or departing employee should have personal knowledge of the employee concerned and their experience, qualifications, training and performance.
- ▶ The following guidelines must be adhered to when providing a reference for a departing or former employee:
 - ▶ Any information which is provided must be factual, fair, accurate and free of malicious intent.
 - ▶ When providing references, do not provide information which is irrelevant or which goes beyond the scope of the information requested.
 - ▶ Due care must be exercised in disclosing information to ensure that it is correct and that it is not the result of rumour or hearsay.
 - ▶ Ensure that you find out what type of position the individual has applied for, as this may affect the nature of your comments.
 - ▶ Do not divulge any information related to salary or other confidential matters. If you have personal knowledge of the individual's salary history, you may confirm or deny salary details only if the enquirer provides such information to you. Do not get involved in a "fishing expedition" for salary details or other personal information.
 - ▶ All written letters of reference must be approved by the President, prior to release.
- ▶ It is our policy not to provide references about departing or former employees who were terminated for cause. In such cases, the information provided to prospective employers will therefore be limited to the position held by the former employee, the length of employment with the Company, and their hire and termination dates.

Section 8

SECURITY

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

COMPANY SECURITY:

At **Castle Building Centres Group Ltd.**, your security and the security of Company/employee property is of vital importance. We all share responsibility in ensuring that proper security is maintained.

- ▶ Any breach of security should be reported promptly to Management.
- ▶ All confidential reports must be filed in locked cabinets and may be used only by authorized employees.
- ▶ No files, documents, papers or computer-stored data of any kind may be taken off the premises without verbal and/or written authorization from the Manager.
- ▶ No Company and/or member files, documents, papers or computer-stored data of any kind may be reproduced or transmitted in any form or by any means, electronic or mechanical, including recording, photocopying or information storage and retrieval systems, for any purpose without the verbal and/or written authorization of the Manager.

BUILDING SECURITY:

The office building located at 100 Milverton Drive is monitored by a security system after regular business hours. The front lobby door is placed on security from 4:30 p.m. to 8.00 a.m. during the week and continually on weekends and public holidays.

- ▶ A security pass is required for the front door and elevator to access the office during these hours.
- ▶ All full-time employees are provided with a security pass that is specifically assigned to that employee and remains their responsibility.
- ▶ Please make sure your security pass is kept in a safe place and used only by you.
- ▶ If your pass is lost or stolen, please report it to the Vice President of Finance immediately.
- ▶ The two doors to the office separate from the lobby can only be accessed by a security pass.
- ▶ If a problem occurs, the security company may be contacted at 905-890-9311.

VISITORS:

- ▶ All visitors' names will be signed in by the Receptionist when visiting the **Castle Building Centres Group Ltd.**
- ▶ Should you have any questions or concerns, please contact your immediate Manager.

EMPLOYEE FILES:

At **Castle Building Centres Group Ltd.**, it is important that we keep accurate employee files for your benefit and to comply with government regulations.

The collection, use and disclosure of your personal information by the Company will be protected by and dealt with in accordance with the principles enshrined in privacy legislation such as the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)* and other provincial privacy legislation.

- ▶ Files for former employees will be maintained for the time period required by all applicable legislation.
- ▶ Please keep your employee file up-to-date by notifying the Vice President of Finance of any changes concerning the following:
 - ▶ address and telephone number;
 - ▶ person to be notified in case of emergency;
 - ▶ legal name;
 - ▶ marital status;
 - ▶ number of dependents for income tax exemptions;
 - ▶ beneficiary (i.e., insurance);
 - ▶ education and/or degrees; or
 - ▶ known drug allergies or illnesses (for emergency situations).
- ▶ You are permitted to examine your personal file with the assistance of the Vice President of Finance. If you wish to do so, contact the Vice President of Finance who will accompany you while viewing your file. Documents obtained through an agreement of confidentiality, such as letters of reference may be excluded from your examination.
- ▶ You may not remove any documents from the file for photocopying or for any other purpose. If you wish to have a copy of a document, speak to the Vice President of Finance.
- ▶ If you wish to correct any information recorded in your file, you should complete the appropriate form (e.g., for insurance, etc.) and forward it to the Human Resources Representative. The Vice President of Finance will inform you of any action taken.
- ▶ Outside organizations such as banks, retail stores, and finance companies may, upon your request and written authorization, receive appropriate information from your employee file.
- ▶ Your Manager and/or the President may review your file at any time. If you apply for a position internally, the hiring Manager may also review your file.

Your employee file may consist of:

- a. your employment application, resume, letter of acceptance, etc.;
- b. your wage, salary and work history;
- c. personal information - hire date, birth date, information for pay deductions, address, home phone number, etc.;
- d. TD1 or other required tax forms;
- e. names of people to contact in case of an accident or illness while at work;
- f. awards, commendations, and disciplinary history;
- g. time and attendance records;

- h. benefit information;
 - i. performance evaluations; or
 - j. work incident reports or notices (warnings, etc.). *Although a written warning which is more than a year old shall remain a part of your permanent employee record, it shall not be used as a basis for future disciplinary action, except written warnings which are issued for attendance and safety violations.*
- ▶ Any medical information relating to a short or long-term disability leave will be kept in a separate file, apart from your personnel file.

VIDEO SURVEILLANCE POLICY:

At **Castle Building Centres Group Ltd.**, we recognize that the privacy rights of employees must be balanced with our duty to provide a safe environment for all employees, members, suppliers and visitors, and our right to protect Company property.

It is the policy of **Castle Building Centres Group Ltd.** to utilize video surveillance on Company property for the following purposes:

- ▶ to ensure the safety of employees, members, and other visitors;
- ▶ as a deterrent for negative behaviour (e.g., theft, vandalism, violence or other criminal activities); and
- ▶ to monitor unauthorized individuals on Company property.

Video surveillance will only be used to address issues of significant concern with regard to safety and security where no less privacy-invasive alternatives exist. The Company will ensure that all video surveillance is conducted in compliance with applicable legislation.

Guiding Principles:

- ▶ Any video surveillance activities must respect the right of an individual to a reasonable expectation of privacy as guaranteed under the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and other similar legislation.
- ▶ Any video surveillance activities will only be conducted for the protection and/or safety of **Castle Building Centres Group Ltd.** employees, members, visitors, and Company assets and property.
- ▶ Installation and use of all video surveillance equipment can only be authorized by Management.
- ▶ If the alleged conduct captured by video surveillance is believed to be criminal, the police will be asked to investigate. Please note that this policy does not apply to the video surveillance activities of any law enforcement agency conducted as part of a lawful investigation.
- ▶ There will be no video surveillance of any kind in any area where there is a reasonable expectation of privacy. In all cases, the use of and viewing range of cameras will be limited as much as possible and will be confined to public areas.
- ▶ There will be clearly visible signs posted indicating areas where video surveillance activities are in effect.
- ▶ No unauthorized employees will be permitted to monitor any video surveillance activities or recordings. All employees who are engaged in monitoring activities must undergo special training that covers the use and operation of the video equipment, **Castle Building Centres Group Ltd.'s** Privacy and Video Surveillance Policies, and the applicable privacy legislation and relevant codes of practice.

- ▶ All records of video surveillance activities will be securely locked in accordance with industry best practices and in compliance with applicable legislation.
- ▶ There will be no use of intentionally non-operational (fake) cameras.
- ▶ Sound will not be recorded unless there is a specific need to do so.
- ▶ Video surveillance will not be used to monitor employee job-related performance on an ongoing basis, but may be used to assist in investigating incidents of employee theft, dishonesty, violence and vandalism, and in workplace accident investigations.
- ▶ Authenticity and integrity of all video surveillance records will be protected.
- ▶ Canadian privacy legislation provides that any video surveillance activities must respect the right of an individual to a reasonable expectation of privacy.
- ▶ Employees who feel that there has been an unauthorized disclosure of their personal information captured through video surveillance, or that the Company has otherwise infringed any part of this policy, may have their case examined by applying in writing to Management.
- ▶ Employees and contractors who fail to adhere to the principles contained within this policy will be subject to disciplinary action up to and including termination.
- ▶ Any video surveillance records and all information gathered in the course of an investigation will comply with the principles of the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and other similar legislation.

Notes:

Section 9

GENERAL ADMINISTRATION

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

PARKING:

At **Castle Building Centres Group Ltd.**, we are pleased to offer the convenience of parking to our employees.

- ▶ Free parking is provided for you anywhere around the building unless the available spaces assigned to other companies.
- ▶ All reserved areas are clearly designated (e.g., Handicapped, etc.).
- ▶ The Visitors area is for our members' and suppliers' use only. Please respect these areas by not parking your vehicle in these locations.
- ▶ Please lock your car every day. **Castle Building Centres Group Ltd.** is not responsible for any loss or damage to your vehicle while it is parked on Company property.

SEVERE WEATHER (EMERGENCY CLOSINGS):

At times, emergencies such as severe weather, fires, power failures, or other "natural disasters," may disrupt our operations. In extreme cases, these circumstances may require the closing of our facility.

- ▶ **Castle Building Centres Group Ltd.** expects everyone to make reasonable efforts to report to work in inclement weather conditions.
- ▶ If weather or travelling conditions delay or prevent your reporting to work, you must notify Management as soon as possible and await further instruction.
- ▶ If you are unable to report for work at all due to weather or travelling conditions, you will be expected to work from home, make up the time within 15 days or use a day of accrued vacation time. If you are unable to make up the time or have no accrued vacation time, you must take a day of unpaid leave, unless the Company is officially closed.
- ▶ If weather conditions make it necessary to close earlier than the regularly scheduled time, Management will notify all employees that they may leave. You will be paid for the balance of the day. Unless you are so notified, you are expected to remain at work.
- ▶ If **Castle Building Centres Group Ltd.** closes due to inclement weather, and employees receive pay at the Company's discretion, you will not be paid in addition to another type of allowable pay for the same day(s) with respect to days not worked, such as holiday pay, vacation pay, sick days, etc.

If the Company is officially closed, employees may receive paid leave at the Company's discretion.

NATURAL DISASTERS AND OTHER EMERGENCIES:

Unfortunately, from time to time emergency situations may arise in our communities that can have an impact on our workplace. **Castle Building Centres Group Ltd.'s** protocol is to ensure that we follow events closely, proactively communicate with our employees and make business decisions based on the well-being of our employees and the circumstances of each unique situation. In each of these situations:

- ▶ the Vice President of Finance will monitor the situation with media and appropriate agencies;
- ▶ we will follow guidelines established by government agencies or other sources (i.e., quarantine protocol, evacuation, etc.);

- ▶ **Castle Building Centres Group Ltd.'s** Management team will make proactive business decisions; and
- ▶ the Vice President of Finance and the Management team will communicate (written and verbal) with employees as required.

BUILDING EMERGENCIES:

In the event of a power failure/system shutdown, it may take a few hours before a professional assessment of the cause of shutdown is available and an estimate can be made as to when power will be restored. During this time, employees should continue to work. Based on the review of the situation, a general guideline would be:

- ▶ if the projected length of the shutdown is less than the number of remaining business hours, business will continue "as usual"; or
- ▶ if the projected length of the shutdown is equal to or greater than the remaining business hours, Management may decide to close the office and send employees home.

If this happens, the office closure will be communicated via e-mail, voicemail or verbally by the President. Managers will communicate with their own employees about the closure.

If the climate control system fails to operate, an employee who experiences any distress/health concerns should notify their Manager, the Vice President of Finance or in their absence, a member of the Health and Safety Committee, of the nature of the distress and should be escorted from the floor or work area:

- ▶ to another **Castle Building Centres Group Ltd.** floor or work area;
- ▶ to a building common area such as the lobby; or
- ▶ to the exterior of the building.
- ▶ The employee should remain there until the power is restored or the situation has been assessed.
- ▶ Each location should abide by the requirements established by the Company.

REIMBURSEMENT OF EXPENSES:

At **Castle Building Centres Group Ltd.**, we will pay for all reasonable expenses incurred by employees while doing business for the Company.

- ▶ **Castle Building Centres Group Ltd.** does not pay any personal expenses.
- ▶ When incurring business expenses you are expected to:
 - ▶ exercise good judgment with respect to all expenses;
 - ▶ spend the Company's money carefully and judiciously; and
 - ▶ check for accuracy of the bills and other documents before paying or accepting them.
- ▶ The Company Travel and Expense Guidelines (separate document) must be followed.

BUSINESS TRAVEL EXPENSE:

At **Castle Building Centres Group Ltd.**, we will reimburse our employees for reasonable business travel expenses incurred while on Company assignments away from the normal work location.

- ▶ All business travel must be approved in advance by your Manager.
- ▶ When approved, the actual costs of travel, meals, lodging, and other expenses directly related to accomplishing business travel objectives will be reimbursed by **Castle Building Centres Group Ltd.**
- ▶ You are expected to limit expenses to reasonable amounts.
- ▶ If you are involved in an accident while travelling on business, you must promptly report the incident to your immediate Manager.
- ▶ The Company Travel and Expense Guidelines (separate document) must be followed.

Commencing immediately the following corporate policy will be in effect:

Prior to any employee including a spouse or partner in any travel to industry or corporate events, approval from your respective Manager will be required. Exceptions to this would be events where spouses/partners have been invited to by Castle (i.e., AGM, Christmas party, etc.).

RECORDS AND REPORTING:

At **Castle Building Centres Group Ltd.**, we have a corporate responsibility to ensure that all assets, debts and business transactions are accurately and promptly recorded and reported.

- ▶ Unrecorded, undisclosed or 'off the books' funds or assets are not allowed under any circumstances.
- ▶ All required communications will be complete, accurate and reliable.
- ▶ All books, records, and accounts (including time sheets, sales reports, invoices, bills and expense reports) must be complete, accurate and reliable.
- ▶ You will never falsify any document or distort the facts relating to a particular transaction.
- ▶ Financial records that reflect our activities and transactions should be maintained in accordance with Canadian Generally Accepted Accounting Principles (GAAP) and in compliance with governing legislation.

DOCUMENT AND RECORD RETENTION AND DISPOSITION:

At **Castle Building Centres Group Ltd.**, we recognize that our information and records are valuable corporate assets and must be managed with due diligence. We will comply with all applicable legal and regulatory requirements. You must manage records and information in a manner that ensures:

- ▶ consistently organized filing, storage and retrieval of recorded information;
- ▶ records are maintained in accordance with all legal, fiscal, regulatory and operational requirements;
- ▶ protection of Company records (including backups) is maintained;
- ▶ needed documentation in the event of litigation can be located quickly and easily; and
- ▶ proper and timely disposal of records no longer of value is carried out.

DO NOT DESTROY DOCUMENTS OR E-MAILS IF YOU LEARN OF LITIGATION OR INVESTIGATIONS!!

Should you have any questions or concerns, please contact your immediate Manager.

ACCOUNTING, AUDITING OR DISCLOSURE CONCERNS:

Castle Building Centres Group Ltd. has a responsibility to submit good faith questions and concerns regarding questionable accounting, auditing or disclosure matters or controls and we have established procedures to that effect.

- ▶ You will follow the established procedures for the receipt, retention and treatment of complaints at all times.
- ▶ Any concerns you may have regarding questionable accounting, auditing matters or disclosure controls may be submitted anonymously to Management and, in all cases, will be treated with confidentiality.
- ▶ You may not fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant who is auditing our financial statements.

HOUSEKEEPING:

OFFICE:

- ▶ You should try to keep your work area neat and tidy with all paperwork off your desk at night.
- ▶ Ledgers, invoice copies, computer printouts, etc. must be filed in their designated areas each night.
- ▶ All confidential reports must be filed in locked cabinets and may be used only by authorized employees.

KITCHEN:

- ▶ The tidy upkeep of the Kitchen is our shared responsibility.
- ▶ Refrigerators and a microwave are available if you choose to bring your own food. Free coffee (or other hot beverages) is available to you.
- ▶ Lunch periods are to be staggered within your department to ensure appropriate coverage in all areas.

CASH HANDLING:

To ensure proper and consistent cash handling procedures throughout **Castle Building Centres Group Ltd.**, all Departments that handle cash must be aware of and show a strong commitment to controls over cash funds. Controls are required to safeguard against loss and to protect employees by defining responsibilities in the handling of cash.

"Cash" may be comprised of coin, currency, cheques, money orders, credit card transactions, and electronic funds transfers.

The following guidelines apply when handling cash:

- ▶ All cash received is to be given to Accounting immediately.
- ▶ All cash will be locked until a deposit can be processed.
- ▶ No cheques are cashed at **Castle Building Centres Group Ltd.**
- ▶ Employees should not accept any large numbers of large bills (e.g., \$50 or \$100 bills) without an immediate Manager's approval.

If you are unsure of how to correctly complete any transaction or unsure of a procedure, ask an immediate Manager.

PETTY CASH:

Castle Building Centres Group Ltd. maintains a Petty Cash for incidental expenses.

- ▶ The Petty Cash will be locked at all times.
- ▶ Only the Accounts Payable Manager will have access to the cash box key and will have the responsibility to ensure there is always an adequate amount of money.
- ▶ Petty cash is not to be used for personal expenses.

A petty cash voucher must be completed with each transaction and must be signed by the Accounts Payable Manager before money is dispensed.

Section 10

HEALTH AND SAFETY

This section is not meant to take the place of an actual Health and Safety Manual (as required by law).

For further information on our health and safety policies, please contact a member of the Health and Safety Committee, the Vice President of Finance or refer to our Health and Safety Manual.

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Castle Building Centres Group Ltd. is committed to accommodating individuals with disabilities. Accommodation requests relating to any company policy will be addressed as outlined in our **Castle Building Centres Group Ltd.** Accessibility Policy.

GENERAL HEALTH AND SAFETY PHILOSOPHY STATEMENT:

- ▶ With your co-operation, it is our goal to have a safe and accident free workplace.
- ▶ We will give support and assistance to our Health and Safety Committee at all times.

STAFF RESPONSIBILITY FOR HEALTH AND SAFETY:

Senior Management is responsible for:

- ▶ overall responsibility for policy and planning;
- ▶ review of control information;
- ▶ responsibility / authority delegation;
- ▶ active support; and
- ▶ holding Supervisors (deemed as "competent persons" as defined under the *Occupational Health and Safety Act*) accountable.

Competent Persons: Must be qualified, have thorough knowledge, training and experience to organize the work and its performance; be familiar with the Act and the regulations that apply to the work being performed in the workplace; and know about any actual or potential danger to health and safety in the workplace.

Managers are responsible for:

- ▶ training;
- ▶ supervision to ensure correct working procedures;
- ▶ informing employees of health & safety rules and personal protective equipment;
- ▶ communication of hazards and control procedures;
- ▶ employee consultation;
- ▶ information feedback to Health and Safety Committee;
- ▶ co-operation with Health and Safety Committee members; and
- ▶ holding accountable those Managers, Supervisors and employees reporting to them.

All employees are responsible for:

- ▶ reporting of hazardous conditions or any unsafe work procedures;
- ▶ reporting of all accidents;
- ▶ compliance with Company rules and procedures;
- ▶ compliance with all procedures and requirements of the *Occupational Health and Safety Act*;
- ▶ reporting injuries to their immediate Supervisors, no matter how minor;
- ▶ using and operating machinery, etc. only as authorized;
- ▶ co-operation with the Health and Safety Committee;
- ▶ wearing personal protective equipment as required;
- ▶ being responsible for the condition of all personal safety equipment issued in the course of their work;

- ▶ keeping the working area in a clean and orderly fashion - this responsibility extends to the lunchrooms, washrooms, parking areas and common worksites; and
- ▶ inspecting their work area and equipment on a daily basis, prior to starting work or when requested.

The Joint Health & Safety Committee is responsible for:

(Ontario's Occupational Health & Safety Act requires that all workplaces with 20 or more employees establish a Joint Health and Safety Committee with representatives from Management and employees)

- ▶ Posting names of committee representatives on the bulletin boards and encouraging employees to discuss any potentially hazardous or dangerous situations with them.
- ▶ Making recommendations to **Castle Building Centres Group Ltd.** on health and safety issues.

The Joint Health and Safety Committee shall consist of:

- ▶ at least two (2) persons where fewer than fifty (50) are employed regularly
- ▶ at least half of the members of the committee shall be employees who do not exercise managerial functions and be selected by the workers
- ▶ the employer shall select the remaining members of the committee from among persons who exercise managerial functions.

WORKER RIGHTS AND RESPONSIBILITIES:

Under governing provincial legislation, employers, supervisors and workers share the responsibility of identifying and solving workplace health and safety problems.

THE RIGHT TO PARTICIPATE:

Workers have the right to be part of the process of identifying and resolving workplace health and safety concerns. They participate through worker membership on joint health and safety committees and reporting concerns to their supervisor or employer.

THE RIGHT TO KNOW:

Workers have the right to know about any hazards they may be exposed to on the job. This includes:

- ▶ the right to be trained;
- ▶ the right to have information about machinery, equipment, working conditions, processes and hazardous materials; and
- ▶ the right to WHMIS 2015 training.

THE RIGHT TO REFUSE UNSAFE WORK:

A worker may refuse work if the employee has reasonable grounds for believing that the work is dangerous to their own health and safety or to another worker. In this situation, the worker must immediately tell their supervisor or a manager that the work is being refused and why.

WORKPLACE SAFETY & INSURANCE BOARD:

The Workplace Safety & Insurance Board is designed to provide compensation to employees who sustain personal injury due to an accident arising out of, and in, the course of their employment or who are disabled by specified industrial diseases.

- ▶ The cost of this compensation is the responsibility of **Castle Building Centres Group Ltd.**, which pays an assessment to a government fund.
- ▶ If you are injured at work, compensation and medical aid are paid by the Workplace Safety & Insurance Board out of this fund.

SUMMARY OF THE WORKPLACE SAFETY & INSURANCE BOARD PROGRAM:

- ▶ Any injury, however slight, shall be reported to a member of the Health and Safety Committee immediately. Payments from Workplace Safety & Insurance Board may be jeopardized unless an injury is reported properly. An accident report must be completed immediately with copies given to the VP of Finance within 24 hours.
- ▶ When an injury requires a health care professional's care, obtain from the Company's VP of Finance the appropriate form and give it to your health care professional for completion.
- ▶ If you think you will be off work for one (1) working day due to an industrial accident, you should inform a member of the Health and Safety Committee so that the appropriate form can be completed and submitted.
- ▶ When you return to work, you should notify a member of the Health and Safety Committee immediately so that the appropriate form may be completed.
- ▶ If you are receiving compensation benefits and are being treated by a health care professional, you may not transfer your case to another health care professional without the written approval of the Workplace Safety & Insurance Board.
- ▶ Compensation is allowed when a disability extends beyond a one (1) working day waiting period. When a disability extends beyond the waiting period, compensation is payable from the commencement of the disability.
- ▶ Compensation is not paid when an accident is attributed solely to the serious and willful misconduct of an employee and does not result in death or serious disablement.
- ▶ Prompt submission of reports will avoid delay in receiving compensation.
- ▶ Approval for payment of a claim is entirely the decision of the Workplace Safety & Insurance Board.

Detailed information on Workplace Safety & Insurance Board may be obtained from the Vice President of Finance.

EMPLOYEE INJURY:

ALL ACCIDENTS, however minor, which occur on the job, MUST be reported to a member of the Health and Safety Committee immediately.

If we don't know of your accident, we cannot file a report on your behalf. If your accident is serious enough to require medical benefits, you may lose out on your opportunity to obtain any benefits that would normally be due to you.

Even a minor cut or scratch can become infected; therefore, we must stress the need to report every accident.

- ▶ All workplace accidents and injuries must be reported immediately to a member of the Health and Safety Committee.
- ▶ If you are injured, **Castle Building Centres Group Ltd.** will provide transportation to a hospital, a health care practitioner or your home.
- ▶ **Alternative Work:** Depending on the nature of an injury, we will determine if alternative work can be made available on a temporary basis to prevent you from experiencing "lost time."
- ▶ **Castle Building Centres Group Ltd.** provides protection against job-sustained injuries or loss of work through workers' compensation programs with the cost of these payments being paid entirely by **Castle Building Centres Group Ltd.** All medical, hospital and surgical expense for job-sustained injuries are covered under this insurance.

*When an injury (whether an employee or not) results in critical injury or death, **Castle Building Centres Group Ltd.** must immediately notify an Inspector at the nearest Ministry of Labour office and the Health and Safety Committee via telephone or fax. Further, within 48 hours the Company must notify a Director of the Ministry of Labour in writing providing the circumstances of the occurrence and any information that may be relevant.*

ERGONOMIC-RELATED INJURIES:

At **Castle Building Centres Group Ltd.**, we support good ergonomic work habits and equipment. Statistics show that poor posture, repetitive strain and awkward movement can, over time, lead to musculoskeletal injury and pain. If you believe your workstation or the physical demands of your job are causing undue strain, please report this immediately to your Manager.

FIRST AID:

The Company provides First Aid boxes that can accommodate minor ailments and injuries that may occur while on the job. The First Aid boxes are located in the Kitchen and the Mailroom. It is your responsibility to become familiar with these locations.

- ▶ The Company encourages you to take part in First Aid Training that meets CSA Standards and in some cases will help offset the cost of training for such courses.

A list of employees, certified in First Aid/CPR, is posted on the Health and Safety bulletin board located in the Kitchen.

FIRE SAFETY:

- ▶ Fire prevention is the responsibility of ALL EMPLOYEES.
 - ▶ Fire alarms, extinguishers and a sprinkler system have been installed throughout our facilities.
 - ▶ In the event of a fire:
 - ▶ Warn people in the immediate area and look for anyone in danger.
 - ▶ Stay calm, evaluate the situation, go to your workstation and/or evacuate the building immediately, if required.
 - ▶ Close all doors as you leave.
 - ▶ Remove high heel shoes.
 - ▶ Assist anyone having difficulties walking down the stairs.
 - ▶ Proceed to ground level and exit the building.
 - ▶ If your clothing catches fire, don't run ... STOP, DROP and ROLL.
 - ▶ In heavy smoke, take short breaths through your nose, stay low and crawl if necessary.
- Do not stop. There is less smoke at floor level.*
- ▶ Remember to keep all exits clear at all times.
 - ▶ Basic procedure in case of fire will be explained to you by your Manager.
 - ▶ You are required to be familiar with fire procedures and safety regulations.

Practice drills are part of the Emergency Plan and may be carried out at various times of the year.

A list of our Fire Wardens is posted on the Health & Safety Bulletin board.

HANDLING EQUIPMENT (OFFICE AND OTHER MACHINERY):

- ▶ If you are working with equipment, you are expected to follow the instructions given to you by your Managers and to wear any necessary safety devices.
- ▶ Never operate equipment of any kind unless you have been trained and are authorized to do so.
- ▶ Before cleaning or servicing any electrical equipment or machines, you must disconnect it from the power source. Shut down, tag and lock out.

WORKPLACE SAFETY RULES:

At **Castle Building Centres Group Ltd.**, nothing is more important to us than the continued health, safety and well-being of our employees, contractors, members and visitors.

- ▶ Safety rules exist for the essential purpose of guarding and protecting you from possible physical harm, loss of time and reduced earnings.
- ▶ We are committed to maintaining proper standards of safety, health, sanitation and working conditions in the workplace and you will co-operate by observing all health and safety rules.
- ▶ "Safety Rules" are for your protection and you must abide by them at all times. Failure to do so will result in disciplinary actions up to and including termination of employment.
- ▶ You are required to report any health or safety concerns to your Health and Safety Committee or your Manager.

The following rules are in addition to the obligations imposed by the governing health and safety legislation.

GENERAL SAFETY RULES:

- ▶ Any accident involving personal injury or damage to material, equipment or structure must be reported to your Manager immediately.
- ▶ Running, horseplay, scuffling, or fighting on Company property will not be tolerated.
- ▶ You shall not report to work under the influence of intoxicants, narcotics or alcohol, nor shall you report to work in possession of any such substance or any harmful or dangerous weapons.
- ▶ Main aisles, emergency exits and areas surrounding fire extinguishers will be kept free of all obstacles.
- ▶ Be aware of the location of fire extinguishers and know how to use them.
- ▶ You are expected to maintain a clean and workable area in compliance with Company housekeeping standards.
- ▶ Spills and tracked-in snow or rain are to be cleaned up.
- ▶ Smoking is prohibited in all areas of the Company.
- ▶ Protect yourself and fellow workers by helping keep the Company clean and tidy at all times. Do not leave food refuse, wrappings or rags lying around.

OFFICE SAFETY RULES:

- ▶ File and desk drawers are not to be left open when unattended.
- ▶ Do not open more than one (1) drawer at a time.
- ▶ Do not keep heavy objects on top of tall filing cabinets.
- ▶ Avoid overfilling cabinets to prevent paper cuts and staple cuts.
- ▶ No cords are to be strung across the floor between desks.
- ▶ Carpets and rugs are to be secure.
- ▶ Chairs and equipment are to be put into their proper place.

MANUAL LIFTING:

- ▶ Use your best judgement and common sense when lifting, lowering or moving objects.
- ▶ When lifting, lowering or moving objects, you must do so in a safe manner. Protect your back. Keep your back as straight as possible when picking up the load, bend knees and lift, lower, push or pull with your legs.
- ▶ Get assistance if the object weighs more than 30 kg (66 lbs.). If you feel uncomfortable or unable to lift an object, seek the assistance of a co-worker (even if the object weighs less than 30 kg (66 lbs.). If you are an office worker, or are not used to material handling, the maximum weight should not exceed 23 kg (51 lbs.).
- ▶ When an object weighs more than 30 kg (66 lbs.) and must be moved:
 - ▶ Seek the assistance of a co-worker;
 - ▶ Use a suitable lifting device such as a tow motor or pallet truck; and/or
 - ▶ In the case of chemicals, make sure you are aware of the contents (SDS) and split the contents into container(s) not to exceed 30 kg (66 lbs.).
- ▶ Assess the object and other factors involved such as size, weight, location, nature, etc. Where appropriate, **Castle Building Centres Group Ltd.** may use The National Institute for Occupational Safety and Health (NIOSH) Lifting Equation to calculate the Recommended Weight Limit (RWL). All materials will be lifted, carried or moved in such a way, and with such precautions and safeguards, as to ensure the safety of workers.

SAFE DRIVING POLICY:

Castle Building Centres Group Ltd. is committed to public safety. We expect our employees with driving responsibilities to adhere to all applicable rules and regulations as they pertain to the safe operation of a Company vehicle.

Requirements:

- ▶ Employees who are required to drive as a major part of their duties are required to have a valid driver's licence and adequate automotive and/or personal insurance.
- ▶ If your position requires you to drive as a major part of your duties, we may require you to provide a driver's abstract to verify your driving record.
- ▶ You should be aware that you are responsible for any fines and/or tickets issued for parking or driving infractions.
- ▶ Should you have any questions or concerns, please contact your Manager.

Drivers are reminded that it is now an offence in most provinces to smoke or hold lighted tobacco when a child (age defined by provincial legislation) is in the same motor vehicle. Because work vehicles are regarded as an extension of the workplace, you must refrain from smoking in any Company vehicle or other vehicle provided for work use. You must also refrain from smoking in your own private vehicle when any other individual is accompanying you for business purposes.

Note: This policy also applies to medical marijuana and "tobacco-free" smoking aids (i.e., nicotine inhalers, electronic cigarettes ("e-cigarettes"), water pipes, etc.). Employees are prohibited from smoking or otherwise consuming recreational marijuana or cannabis products (including edibles) on Company premises, in Company vehicles, on breaks or at any time while on duty. Legalization of recreational marijuana does not mean that employees are entitled to show up for work in an intoxicated state. Employees with a valid prescription for medical marijuana should notify the Vice President of Finance before consuming such products in the workplace, during breaks or prior to their work shifts. Please refer to the ***Alcohol and Substance Use Disorder policy*** on page 41 for further information.

EMERGENCY VEHICLES:

Legislation in some provinces now requires motorists, when approaching a police, fire or ambulance vehicle stopped with its lights flashing in the same direction of travel, either in a lane or on the shoulder of the road, to slow down and pass with caution. If the road has two (2) or more lanes, the motorist must move over into another lane, if it can be done safely.

- ▶ This legislation requires motorists to slow down and move over when passing police, fire, ambulance and towing vehicles, as well as vehicles used by commercial vehicle safety and enforcement personnel, passenger transportation inspectors, conservation officers, park rangers, and special provincial constables.
- ▶ It is also the law for any driver who sees or hears an emergency vehicle approaching from either direction to move out of the way and stop, if it can be done safely.

OCCUPATIONAL HEALTH & SAFETY AWARENESS TRAINING AND ORIENTATION:

At **Castle Building Centres Group Ltd.**, we have instituted mandatory occupational health and safety awareness training and orientation programs for current and new employees. In order to comply with our requirements under the *Occupational Health and Safety Act* ("the Act") and associated regulations and provide a safe and healthy workplace, all employees will be required to attend training sessions covering the following information:

- ▶ The rights and obligations of workers, supervisors and employers under *the Act*.
- ▶ The role of the Health and Safety Committee under *the Act*.
- ▶ The roles of the Ministry of Labour and the Workplace Safety and Insurance Board with respect to occupational health and safety.
- ▶ Common workplace hazards, including those that pertain specifically to our workplace.
- ▶ Requirements relating to the Workplace Hazardous Materials Information System (WHMIS 2015) and information pertaining to the use of hazardous products.
- ▶ Occupational illnesses, including the topic of latency.

All workers who have completed the mandatory occupational health and safety awareness training/orientation will be required to sign off on the fact that the training was completed and that instruction was provided on the above topics. Additional training is required for managers and supervisors and any employee who is promoted to a managerial position, as well as the Health and Safety Committee.

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DISCLOSURE FORM:

- I have listed below any present or anticipated financial endeavours, outside employment or other activities and any additional information that might constitute a conflict of interest or a violation of the Company's Code of Business Conduct.

OR

- At this time, I have nothing to disclose.

I understand that if any changes should occur, I will immediately complete a new Disclosure Form.

Name (please print): _____

Signature:* _____

Date: _____

* By signing this disclosure form, I also confirm that I have read, understood and agree to comply with the terms of our Company's Code of Business Conduct that is outlined in our Employee Handbook.

Section 11

APPENDIX:

IN THIS SECTION

Remote Worker Protocols:120

Remote Work Protocol Guide



These protocols are intended to protect the equipment and information that we use in the daily operations at Castle. By following the protocols below while working on your computer, you can be an active participant in keeping the Castle organization free and clear of digital attackers. These protocols are mandatory practices that all staff are required to follow.

1. Secure Connection Practices:

- a. **Use Secure Wi-Fi:** Connect only to secure, password-protected Wi-Fi networks.
- b. **Avoid Public Wi-Fi** when possible and minimize time online if not possible. For example, compose an email in Outlook, then connect only to send it.

2. VPN Usage Guidelines:

- a. **When to connect:** Connect to the VPN before accessing any work-related resources or applications that specifically require VPN. Consult the application chart below.
- b. **Disconnect after work:** Save your work and disconnect from the VPN when you are not working, including during extended periods such as lunch breaks and at the end of the work day.

VPN REQUIRED	NO VPN REQUIRED
<ul style="list-style-type: none"> • Share drives (NETFILES) • CBCReporter (PowerBI) • Intranet • JDE 	<ul style="list-style-type: none"> • Microsoft Teams • Microsoft Outlook • Microsoft OneDrive • Symantec Antivirus Updates & Scanning • LBMX (uses Cisco VPN only) • General Internet use • Booking sites, Monday.com, etc. • Castle.ca • Castle 4C • Castlecore

3. Powering Off:

- a. **Shutdown the laptop completely when not in use** using the shutdown method provided by the system. *Closing the lid does not mean the laptop is shut down. As a last resort only: If for any reason the laptop does not shut off properly over an extended time, and it is not conducting updates, pressing and holding the power button for 10 seconds will force a shutdown.*

4. Password and Multi-Factor Authentication (MFA) Security:

- a. **Use unique and complex passwords** across all accounts and devices. Typical is a minimum of 8 characters including a mix of upper and lower case letters, numbers and symbols.
- b. **Do not reuse** passwords.
- c. **Do not share** passwords with others.
- d. **Change passwords** for on-line sites and services periodically
- e. **Use Multi-Factor Authentication (MFA)** for all sites and services whenever possible.
- f. If you use electronic notes for passwords 1) password-encrypt the file 2) keep a printed copy.

5. Physical Device Security:

- a. Work From Home: Take your laptop with you at the end of every in-office day.
- b. If your portable device is to be left in the office, ensure it is secure by keeping it in a locked compartment.
- c. Never leave your device in a vehicle or other location where it can be exposed to freezing or excessively hot temperatures. If this does occur by accident, do not turn your device on until it has completely reached room temperature.
- d. Take your device with you when leaving your vehicle whenever possible. If your device is to be left in a vehicle for any period of time, lock it in a trunk or rear of vehicle. Conceal it if it may be visible.
- e. Keep food or drink at least an arms length away from your device. Be mindful of your location and objects that could damage your device.

6. Software:

- a. Do not install unapproved software on your device.
- b. You may request software at any time from I.T. with a stated business case.
- c. Only run authorized scripts distributed by I.T.
- d. Only run scripts if you do not have access to your drives while connected to VPN.
- e. Except for antivirus updates, do not perform updates to installed software unless instructed. If presented with prompts on-screen, check with I.T. or decline.

7. Data Handling Best Practices:

- a. **Organize and save** your files on the Microsoft OneDrive or the company file server (Netfiles). Files on your device are not backed up. (Unless OneDrive Sync is enabled for the specific folder)
- b. **Personal Files on your company computer:** Consider keeping or backing up personal files on a USB stick or a cloud service such as Google Drive to ensure they are always available to you.
- c. **Secure File Sharing:** When sending sensitive attachments is necessary, password encrypt the document and text the password to the recipient.

8. Phishing Awareness:

- a. **Regular training and reinforcement** will be provided to educate staff on current attack methods, identification, and prevention.
- b. **Pay attention to alerts** that may be issued by I.T. and prioritize reading alerts before reading other unread mail.
- c. **Verify the sender's identity** before clicking on any links or downloading attachments. Verification is best done by a voice call.
- d. Never reply to a suspicious email.
- e. Contact I.T. if you are unsure about an email.
- f. Immediately contact I.T. if you feel you have been misled and taken an incorrect action with an email.

9. Secure Communication:

- a. Ensure that all sites and applications by which you are conducting business activity are encrypted, usually indicated by a padlock icon and/or "https".
- b. Do not conduct work-related tasks on non-company systems unless it is approved to meet or exceed company security standards.

10. I.T. Support and Reporting:

- a. For all suspected computer/information security incidents, including suspicious on-line activities, lost devices or data concerns, report immediately to I.T. using clear language:
 - i. Write down and/or photograph messages and evidence about the incident.
 - ii. Write down dates and times of first discovery
 - iii. Write down any actions taken prior and since that can be used to determine the issue.

- iv. Describe how it affects your work activities and the work of others.
 - v. Describe how the issue affects deadlines and the deadlines of others.
 - vi. Describe how you may be able to work around the issue temporarily.
- b. Methods of contact:
- i. E-mail: helpdesk@castle.ca goes to the entire I.T. team.
 - ii. Teams: Directly contact any I.T. Team member
 - iii. Phone: Alex – 416-702-7994

11. Security Awareness:

- a. **Continuous Education:** Regular security awareness training sessions will be held that will also review best practices, talk about the latest threats, and answer questions.
- b. **Notices and Alerts:** Read emailed alerts from your I.T. Team about imminent attacks, phishing attempts, and scams. Read thoroughly for appropriate actions and possible changes to actions sent previously.
- c. **Partners:** If you become aware of any attack on any Castle partner (vendor, member or internal supplier) please make the I.T. department aware immediately. It is imperative that appropriate actions take place in a timely manner to minimize any potential threat to Castle.

By following these guidelines, the Castle staff can operate as *empowered* remote users, working securely and confidently, minimizing the risk of cybersecurity incidents while maintaining productivity.