



Natt Group of Companies

Title: Code of Conduct	
Locations: All	Date of Issue: August 11, 2023
Document No: POL-HR-002	Revision Date: December 2, 2024
Category: Human Resources	Last Reviewed: December 2, 2024
Approved by: Kevin Pattison, President	

Purpose	<p>Natt Group of Companies (Natt) is committed to conducting its business with integrity, honesty, and professionalism consistent with this Code of Conduct (Code), and in compliance with applicable laws and by-laws. This policy cannot address every situation that employees may encounter. For this reason, this policy does not relieve employees of the responsibility and accountability to exercise good judgement and in circumstances where they are unsure as to the proper course of action, to seek guidance from Natt management.</p> <p>Any violation of this Code by an employee may result in discipline, up to and including termination.</p> <p>This policy applies to:</p> <ol style="list-style-type: none"> 1. All Natt employees, including full-time, part-time, temporary, student, casual or term employees; and 2. Any persons, who perform work at a Natt workplace including but not limited to, contractors, consultants, unpaid interns or co-op students, and an individual that uses Natt assets and performs work for Natt (collectively referred to as "contractors").
Policy	<p>This Code provides a framework of principles for conducting business and dealing with employees, customers, and contractors which are:</p> <ol style="list-style-type: none"> 1. To act with personal integrity, ethics, honesty, diligence, and professionalism and in the best interest of Natt 2. To be scrupulous in the proper use and protection of Natt information, funds, equipment, and property 3. To comply with all laws and by-laws, regulations and Natt policies governing ethical behaviour and conduct 4. To exercise fairness, equity, courtesy, and sensitivity in dealing with employees, customers and contractors

5. To respect the dignity and rights of others and without discrimination
6. To avoid conflicts of interest or the appearance of a conflict of interest
7. To promote a safe and secure work environment

Employee and Contractor Responsibility

All employees and contractors are required to:

1. Adhere to the standards described in the Code.
2. Comply with all applicable legislation and municipal by-laws, including but not limited to the responsibilities and obligations as set out in Ontario Human Rights Code. Employees and contractors are expected to be sufficiently familiar with any legislation that applies to their work and to recognize potential liabilities and know when to seek advice.
3. Perform their duties and responsibilities with integrity, impartiality, professionalism, skill, honesty, objectivity, care and diligence, using their job-related authority in a fair and equitable manner.
4. Be accountable and transparent and apply good judgement and discretion in the course of making business decisions.
5. Avoid all real or perceived conflicts of interest.
6. Not engage in inappropriate and unprofessional conduct in the workplace, examples include: profanity or swearing; excessive noise; insulting or negative comments that can affect the workplace; offensive pictures or jokes; and demonstrating little or no respect for others and/or their personal belongings. Employees are expected to be reasonable and fair in their expectations of each other and resolve any conflict in a mature and professional manner.
7. Ensure property or assets in the workplace are not threatened or damaged.
8. Always reflect a professional image; employees and contractors are requested to be mindful of their attire and dress appropriately for their job.
9. Abide by Natt policies and procedures, instructions and lawful directions that relate to their employment, duties and responsibilities.
10. Refrain from committing or condoning any unethical or illegal act or instructing another employee or contractor to do so. Natt employees and contractors should take the approach that every act should withstand the scrutiny that would be applied if it were committed in public view.
11. Maintain a safe and secure work environment.

12. Refrain from making comments that slander, defame and/or disparage the reputation of Natt or an employee of Natt.
13. Work in accordance with Natt policies and controls established to prevent fraudulent misconduct.
14. Promptly report violations of this Code.

Management Responsibility

In addition to the requirements set out above, Natt managers and supervisors are required to:

1. Commit to being a leader, and model the appropriate behaviours outlined in this code.
2. Ensure that their employees and contractors are aware of, and act in compliance with, this Code and its related policies.
3. Create a work environment reflecting the content and spirit of this Code.
4. Must make every effort to establish and maintain adequate systems, procedures and controls to prevent and detect fraud, theft, breach of trust, conflict of interest, bias and any other form of wrongdoing and criminal activity.
5. Upon receiving disclosure of an actual or potential breach of this Code, the supervisor or manager shall either determine that no breach exists or take reasonable steps to ensure that the matter is addressed in the appropriate manner. This includes seeking advice from Human Resources.
6. Ensure that each incident of suspected wrongdoing is investigated. If a breach of this Code or any other related policy is proven, Natt will deal firmly and fairly with the employee or contractor, as applicable, in addressing the breach of this Code or any other related policy.

Reporting Allegations

1. A breach of this Code requires immediate attention, and employees and contractors (as applicable), have an obligation to report any known or suspected breaches, including unethical or illegal conduct as soon as they occur or become aware of them.
2. Any allegations of a breach of this Code should be made to the employee's immediate supervisor or, if the allegations are being reported by a contractor to the applicable Natt representative or contract administrator.
3. Employees and contractors should provide as much information as possible about the possible breach they are reporting. When reporting an alleged violation of this Code, employees or contractors are encouraged to provide

	<p>their name and contact information. This information will assist in the investigation of the matter, including any follow-up discussions that may be needed. In some cases it may not be possible to initiate or properly conduct an investigation without this information.</p> <ol style="list-style-type: none"> 4. Employees and contractors must co-operate fully during an investigation relating to a suspected breach of this Code or any other related policy. 5. Acts of retaliation or consequence targeted at any employee who reports a suspected breach of this Code, is a potential witness, or is involved in an investigation will not be tolerated. Such acts will result in disciplinary action up to and including termination. 6. Any employee under investigation for an alleged breach of this Code may, among other things, be suspended with or without pay or be re-assigned to other duties pending completion of the investigation, depending on the particulars of the case and the best interests of Natt. 7. When in doubt about the interpretation of application of this Code, clarification should be sought from an employee's immediate supervisor or Human Resources.
<p>Related Documents</p>	<ul style="list-style-type: none"> • POL-SAF-014: Harassment, Violence and Discrimination in the Workplace Policy



Natt Group of Companies

Title: Health & Safety Policy	
Locations: All	Date of Issue: February 27, 2006
Document No: POL-SAF-001	Revision Date: December 02, 2024
Category: Health & Safety	Review Date: January 03, 2025
Approved by: Kevin Pattison, President	

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

Title: Health and Safety Responsibilities	
Locations: All	Date of Issue: February 27, 2006
Document No: POL-SAF-002	Revision Date: December 2, 2024
Category: Health & Safety	Review Date: December 2, 2024
Approved by: Kevin Pattison, President	

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

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

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



Natt Group of Companies

Title: Harassment, Violence and Discrimination in the Workplace	
Locations: All	Date of Issue: October 07, 2020
Document No: POL-SAF-014	Revision Date: December 02, 2024
Category: Health & Safety	Review Date: January 03, 2025
Approved by: Kevin Pattison, President	

Policy	<p>Natt Group of Companies (NATT) is committed to providing a work environment in which the safety, worth, dignity and rights of individuals are respected and protected.</p> <p>Every person has a right to freedom from harassment, violence, and discrimination in the workplace, both psychologically and physically. As a company, we have a legal responsibility and are committed to providing a workplace free from harassment, violence, and discrimination by the company, agent of the company or by another person because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offenses, marital status, family status or handicap.</p> <p>Workplace harassment means,</p> <ul style="list-style-type: none">• 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 <p>Workplace harassment or bullying is persistent or excessive negative behaviour towards a worker in the workplace. It includes:</p> <ul style="list-style-type: none">• Engaging in verbal abuse (e.g. yelling, name calling, making threats)• Belittling a worker's opinions• Spreading malicious rumours• Undermining or sabotaging a worker's work• Deliberately ignoring or excluding a worker (e.g. silent treatment) <p>Workplace sexual harassment means,</p> <ul style="list-style-type: none">• Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
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- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

A reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

Workplace violence means,

- The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- An attempt to exercise physical force against a worker, in the workplace, that could cause physical injury to the worker,
- A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Workplace violence includes threatened, attempted, or actual behaviour of a person that causes or is likely to cause physical injury to an employee in the workplace. Examples include:

- Physical attacks such as kicking, hitting, pushing
- Verbal or written threats that express an intent to harm
- Threatening behaviour such as shaking fists, or destroying property

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

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



Natt Group of Companies

Title: Substance Use and Impairment	
Locations: All	Date of Issue: February 27, 2006
Document No: POL-SAF-013	Revision Date: December 2, 2024
Category: Health & Safety	Last Reviewed: December 2, 2024
Approved by: Kevin Pattison, President	

Introduction	<p>Natt Group of Companies (NATT) is committed to promoting a safe, healthy and productive workplace for staff.</p> <p>It is recognized that the consumption of alcohol, cannabis, drugs, prescription medications and over-the-counter medications may impair a person's ability to perform their job properly which in turn could have serious adverse effects on the safety and well-being of themselves, their co-workers, the public and impact upon NATT's reputation.</p> <p>This is NATT's policy regarding alcohol, cannabis, and drug use and impairment in the workplace, which establishes the minimum expectations for a NATT employee to abide by while conducting work on behalf of NATT, whether on or off NATT property. If the contractor the employee is working for or the worksite the employee is working at provides a policy that is more restrictive/detailed than this policy, the employee is to adhere to the specifications of that policy while remaining in compliance with NATT's expectations as outlined in this document. Should an employee be unsure of their obligations regarding alcohol, cannabis, and drug use and impairment in the workplace, they may contact their supervisor for clarification.</p>
Policy	<p>Consumption of alcohol, illegal drugs, legal recreational drugs, over-the-counter drugs or prescription medications that jeopardizes or could potentially jeopardize the health and safety or well-being of the employee, other employees, non-employees, the public and/or the reputation of NATT is deemed to be unacceptable and inappropriate behaviour.</p> <p>This policy prohibits employees from working while impaired due to alcohol, illegal drugs, legal recreational drugs (such as cannabis), over-the-counter drugs, prescription drugs, or any other substance.</p> <p>Definitions</p> <p>For the purpose of this policy:</p> <p><u>Alcohol</u>: any product which contains ethyl alcohol, including beer, wine, liqueurs, spirits and medicinal products. Very low alcohol products (e.g. beer with 0.5% alcohol by volume) are included in this definition.</p>

Illegal Drugs: Any and all controlled substances which cannot be legally possessed under Canadian law. For example, such illegal drugs include but are not limited to cocaine, heroin, hallucinogens, stimulants, and other controlled drugs obtained without a physician's prescription and as contained in the *Controlled Drugs and Substances Act*.

Impairment or Impaired: consumption that interferes with an employee's ability to carry out their job functions (whether physical or mental) in a safe, efficient, and productive manner.

Legal Recreational Drugs: the recreational use of cannabis including smoking, vaping or edible forms and other recreational drugs legally approved by Canadian legislation.

Over-the-Counter Drugs: medications which do not require a prescription from a physician, dentist, or other healthcare professional.

Prescription Drugs: medications which are prescribed by a physician or dentist, legally require a prescription, and are dispensed by a registered pharmacist or physician.

Expectations

- 1) The consumption of alcohol, legal recreational drugs or illegal drugs is prohibited at all NATT workplaces or at any time when conducting work on behalf of NATT, whether on or off NATT property.
- 2) Employees, while in the course of their duties, shall not be in possession of alcohol, legal recreational drugs and/or illegal drugs while conducting work on NATT property or at any work location.
- 3) Employees using prescription drugs in accordance with a medical practitioner's care, or over-the-counter drugs for the purpose of symptomatic relief, have an obligation to understand the potential risk of impairment and disclosing such risk to their supervisor. When required, the supervisor will provide reasonable accommodation, if available.
- 4) Employees on "standby" or "on-call" duty will exercise utmost personal judgement on every occasion before responding to a call to work to exclude the possibility of being impaired when reporting to or performing work.

Exceptions

- 1) Employees attending employer sanctioned social functions or events shall behave responsibly and in accordance with this policy and the law in regard to alcohol consumption or legal recreational drug use and shall not endanger their own safety or the safety of others, nor interfere with the enjoyment of others.
- 2) Organizers of work-related social events involving alcohol consumption have a responsibility to arrange transportation for any guest who appears to be impaired. They must also make every reasonable effort to ensure that anyone in attendance who may become impaired does not put themselves or others at risk or otherwise expose the employer to the possibility of liability action. Organizers of work-related social events held on third party premises have the

added responsibility of ensuring that said third party has an appropriate alcohol service policy in place and will provide alternate transportation for those unable to drive due to impairment.

- 3) Employees and/or their guests attending work related social events who become impaired, refuse safe transportation, and proceed to operate a vehicle are subject to having their actions reported to the police.
- 4) Employees attending business related conferences, seminars, lunches and/or receptions by virtue of their position with the employer, shall behave responsibly and in accordance with the law in regard to alcohol consumption, the use of legal recreational drugs or illegal drugs so as to protect their own and others' safety, as well as NATT's corporate image and reputation.
- 5) Employees in violation of exceptions numbered 1 through 4 of this section are subject to progressive discipline, up to and including termination.

Suspicion of Impairment

The following may be enacted if there is reasonable belief that an employee is impaired at work. In these circumstances, the "Reasonable Grounds Record Form" should be used.

- 1) If possible, the employee's supervisor will first seek another manager's or supervisor's opinion to confirm the suspicion of impairment.
- 2) Next, the supervisor will consult privately with the employee (and Human Resources, if required) to determine the cause of the observation, including whether substance abuse has occurred. Suspicions of an employee's ability to function safely may be based on specific personal observations. If the employee exhibits unusual behaviour including but not limited to slurred speech, difficulty with balance, watery or red eyes, or dilated pupils, or if there is an odor of alcohol, the employee will not be permitted to return to their assigned duties in order to ensure their safety and the safety of other employees or visitors to the workplace.

If the employee works in a safety sensitive position, they may be required to undergo Drug and Alcohol testing.

- 3) If an employee is considered to be impaired and deemed "unfit for work", this decision is made based on the best judgement of two members of management and DOES NOT require a breathalyzer or blood test. The employee may be advised that NATT has arranged to safely transport them to their home address or to a medical facility, depending on the determination of the observed impairment. The employee may be accompanied by a manager, supervisor, or another employee if necessary.
- 4) An impaired employee will not be allowed to drive. The employee should be advised if they choose to refuse employer-organized transportation and decide to drive their personal vehicle, the company is obligated to and will contact local law enforcement to make them aware of the situation.
- 5) A meeting may be scheduled for the following workday to review the incident and determine a course of action.

Drug and Alcohol Testing

When an employee is to undergo testing, they will be removed from duty and escorted to a designated area to complete the necessary paperwork. As soon as the appropriate paperwork has been completed, the employee will be sent to a designated lab, where one or all of the following tests will be conducted:

- Blood Alcohol Breath Test
- Urine (may cover marijuana, phencyclidine, cocaine, amphetamines, opioids and fentanyl)
- Saliva (may cover marijuana, phencyclidine, cocaine, amphetamines, opioids and fentanyl)

The results of the tests, when available, will be communicated by the clinic to NATT Group management. Test results are confidential and will not be made known to anyone except NATT Group Management. The only exception is if the employee requests in writing that the results be forwarded to their physician.

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

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

Alcohol & Drug Addiction

Employees who think they may have a substance use issue may be referred to a Substance Abuse Program. In addition, such employees may avail themselves of other employee benefits to ensure sufficient support to assist them in overcoming their addiction or substance use.

- NATT retains the discretionary right to request an employee to participate in an appropriate rehabilitation program. When an employee refuses to participate in a rehabilitation program and the employee's work performance continues to be unsatisfactory, the employee will be subject to progressive discipline, up to and including termination.
- NATT is committed to providing reasonable accommodation to those employees whose drug or alcohol consumption issue is considered to be an addiction to the extent provided for under Provincial law. Each case will be assessed on its own circumstances.

Disciplinary Action

- Employees who arrive to work unfit for duty and unable to perform their duties safely and to standard will be immediately sent home without pay and may be subject to disciplinary action up to and including termination of employment.

	<ul style="list-style-type: none"> • Any employee found to be consuming substances while conducting work on behalf of NATT without permission will be subject to disciplinary action up to and including termination of employment. • Employees engaging in illegal activities (for example, selling drugs or alcohol) while conducting work on behalf of NATT will be subject to disciplinary action up to and including termination of employment. • Employees who return a positive result from Drug and Alcohol testing will be subject to disciplinary action up to and including termination of employment. • Employees who have either relapsed or have not been successful in a rehabilitation program, despite workplace accommodation, may be terminated if there is a recurring impact on job performance and/or the work environment.
Related Documents	<ul style="list-style-type: none"> • FOR-SAF-001 Reasonable Grounds Record Form • POL-HR-002 Code of Conduct
Materials/ Resources	<ul style="list-style-type: none"> • Ontario Health and Safety Act, 1990 • Cannabis Control Act, 2017 • Controlled Drugs and Substances Act, 1996 • Ontario Human Rights Commission <ul style="list-style-type: none"> ○ http://www.ohrc.on.ca/en/human-rights-mental-health-and-addiction-disabilities-brochure • ConnexOntario – Mental Health, Addiction and Problem Gambling Services <ul style="list-style-type: none"> ○ 1-866-531-2600 ○ htNATT://www.connexontario.ca/en-ca/contact-us



Natt Group of Companies

Title: Mobile Devices in the Workplace	
Locations: All	Date of Issue: January 25, 2016
Document No: POL-SAF-034	Revision Date: December 2, 2024
Category: Health & Safety	Last Reviewed: December 2, 2024
Approved by: Kevin Pattison, President	

Purpose	<p>The purpose of this policy is to establish a procedure to reduce injuries directly or indirectly related to using mobile devices while working. There are many hazards associated with using mobile devices while working. It can distract users from the hazards associated with their work tasks and their surroundings, and it can distract other workers in the area.</p> <p>Restricting the use of mobile devices will increase the level of concentration of workers. If workers are more focused on their job, the quality of their work will improve, and the number of incidents associated with the distractions caused by using mobile devices will decrease.</p>
Policy	<p>For the purpose of this policy, mobile devices include, but are not limited to, smart phones, cell phones and tablets.</p> <ul style="list-style-type: none"> • The use of mobile devices is not permitted while operating any vehicle or equipment. This applies to text messaging as well. You are to locate a lawfully designated area to park and make the call. Your full concentration is needed to operate the vehicle in the best of conditions. When factoring in traffic and weather conditions, handheld devices soon become an accident waiting to happen. A large percentage of commercial accidents are related to inattention by Drivers talking on cell phones while driving. • Only those individuals authorized by NATT Management are permitted to use mobile devices on worksites. The use of mobile devices on site is prohibited unless expressed consent is granted by NATT Management. This includes talking, texting, emailing, playing games, etc. • The use of mobile devices is not permitted while attending safety meetings or while receiving safety-related information such as safety training or a safety talk. • Supervisors should make every reasonable effort to avoid using their mobile device or making calls while directing activities on the worksite. • Mobile devices must be turned off when working.

- The use of mobile devices is not permitted around explosive or flammable atmospheres.
- If an urgent family matter requires a worker to use their mobile device, the worker must coordinate with the supervisor so that the communication can be done in a safe manner.
- Workers are permitted to use mobile devices when they are on a designated break, in a designated area i.e. break room, lunchroom, site trailer, lawfully designated parking area etc.
- Per job requirements, Confined Space Attendants will require two-way radios for constant communication with entrants of the confined space.
- Confined Space Attendants/Rescuers Working Lead will be permitted to have a cell phone on-site in case of emergency.

Discipline

Workers who violate this policy will be subject to disciplinary measures up to and including termination.

Any negligence or workplace accidents caused by employee mobile device use will result in the immediate termination of the employee.



Natt Group of Companies

Title: Smoking Policy	
Locations: All	Date of Issue: January 25, 2017
Document No: POL-SAF-036	Revision Date: December 02, 2024
Category: Health & Safety	Review Date: January 03, 2025
Approved by: Kevin Pattison, President	

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

It is Management's commitment to ensure this policy is communicated, posted & enforced.

Workers who violate this policy will be subject to disciplinary measures up to and including termination.



Natt Group of Companies

Title: Disconnecting from Work Policy	
Locations: All	Date of Issue: June 2, 2022
Document No: POL-HR-003	Revision Date: December 02, 2024
Category: Human Resources	Last Reviewed: December 02, 2024
Approved by: Kevin Pattison, President	

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

Exceptions

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

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

NATT and Employee Obligations

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

NATT's Obligations

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

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

Employee Obligations

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

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

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



Natt Group of Companies

Title: Electronic Monitoring of Employees Policy	
Locations: All	Date of Issue: Oct 11, 2022
Document No: POL-HR-004	Revision Date: December 2, 2024
Category: Human Resources	Last Reviewed: December 2, 2024
Approved by: Kevin Pattison, President	

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

			access of NATT systems and networks.	
	Video Camera Systems (property and facilities)	Continuous	Cameras record video footage of specific areas within NATT' properties and facilities.	Facility security, employee and asset protection.
	In cab cameras (Inward & outward Facing)	Continuous, while in cab	Cameras record video footage which is accessed and reviewed	Identify training opportunities
	Collaboration and Learning Management software and tools i.e. Salesforce, Bistrainer	Continuous	Software monitors access and use.	Service delivery and productivity monitoring.
	<p>In addition to the purposes listed above, NATT may use any electronic monitoring tools for the purposes of monitoring, evaluating or investigating employee performance, behaviour or conduct, including whether to issue an employee discipline, up to and including termination of employment. NATT values employee privacy and its use of any electronic monitoring tools for employment-related or disciplinary purposes is discretionary. NATT's use of any electronic monitoring tools for employment-related purposes is further subject to any rights an employee may otherwise have per their employment contract or otherwise at law.</p> <p>This Policy does not provide employees with any new privacy rights or a right to not be electronically monitored. Nothing in this Policy affects or limits NATT's ability to conduct, or use information obtained through, electronic monitoring.</p> <p>In the event NATT collects any personal information, as defined in the <i>Freedom of Information and Protection of Privacy Act (FIPPA)</i>, when using the electronic monitoring tools listed above, NATT shall collect, use and disclose personal information in accordance with applicable legislation, including, but not limited to, FIPPA.</p>			
Compliance	<p>1) NATT will provide all current employees with access to or a copy of this Policy within 30 calendar days of implementation.</p> <p>2) NATT will provide all employees hired after this Policy is first implemented with access to or a copy of this Policy (or the applicable revised version) within 30 calendar days of the employee's start date.</p> <p>3) The policy may be amended from time to time at NATT's sole discretion. In the event this Policy is amended, NATT will provide each employee with access to or a copy of the amended Policy within 30 calendar days of the date the amendment(s) become effective.</p>			

4) NATT will provide a copy of this Policy to assignment employees assigned to perform work for the NATT within 24 hours of the start of the assignment or within 30 days of the Policy's implementation, whichever is later.

5) NATT shall retain a copy of this Policy and any revised version of this Policy for a period of three (3) years after it ceases to be in effect.