

COMPANY POLICIES AND POSTERS

Top Defence Security Services Inc.

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Employment Standards in Ontario

The *Employment Standards Act, 2000* (ESA) protects employees and sets minimum standards for most workplaces in Ontario. **Employers are prohibited from penalizing employees in any way for exercising their rights under the ESA.**

What you need to know

Public holidays

Ontario has a number of public holidays each year. Most employees are entitled to take these days off work and be paid public holiday pay. Visit [Ontario.ca/public_holidays](https://www.ontario.ca/public_holidays).

Hours of work and overtime

There are daily and weekly limits on hours of work. There are also rules around meal breaks, rest periods and overtime. Visit [Ontario.ca/hoursofwork](https://www.ontario.ca/hoursofwork) and [Ontario.ca/overtime](https://www.ontario.ca/overtime).

Termination notice and pay

In most cases when terminating employment, employers must give employees advance written notice of termination or termination pay instead of notice. Visit [Ontario.ca/terminationofemployment](https://www.ontario.ca/terminationofemployment).

Vacation time and pay

There are rules around the amount of vacation time and pay employees earn. Most employees can take vacation time after every 12 months of work. Visit [Ontario.ca/vacation](https://www.ontario.ca/vacation).

Leaves of absence

There are a number of job-protected leaves of absence in Ontario. Examples include sick leave, pregnancy leave, parental leave and family caregiver leave. Visit [Ontario.ca/ESAGuide](https://www.ontario.ca/ESAGuide).

Minimum wage

Most employees are entitled to be paid at least the minimum wage. For current rates visit [Ontario.ca/minimumwage](https://www.ontario.ca/minimumwage).

Other employment rights, exemptions and special rules

There are other rights, exemptions and special rules not listed on this poster, including rights to severance pay and special rules for assignment employees of temporary help agencies.

Subscribe to our newsletter and stay up to date on the latest news that can affect you and your workplace. Visit [Ontario.ca/labournews](https://www.ontario.ca/labournews).

Learn more about your rights at:

[Ontario.ca/employmentstandards](https://www.ontario.ca/employmentstandards)
1-800-531-5551 or TTY 1-866-567-8893

 @ONTatwork  @OntarioAtWork  @Ontarioatwork

Health & Safety at Work

➤ Prevention Starts Here

Ontario's Occupational Health and Safety Act gives workers rights. It sets out roles for employers, supervisors and workers so they can work together to make workplaces safer.

➤ Improve Health and Safety:

- **Find out** about your Joint Health and Safety Committee or Health and Safety Representative.
- **Talk** to your employer, supervisor, workers, joint health and safety committee or health and safety representative about health and safety concerns.

**Call the Ministry of Labour,
Training and Skills Development
at 1-877-202-0008**

Report critical injuries, fatalities,
work refusals anytime.

Workplace health and safety information,
weekdays 8:30am – 5:00pm.

Emergency? Always call 911 immediately.

Find out more:

ontario.ca/healthandsafetyatwork



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➤ Workers have the right to:

- **Know** about workplace hazards and what to do about them.
- **Participate** in solving workplace health and safety problems.
- **Refuse** work they believe is unsafe.

➤ Workers must:

- **Follow** the law and workplace health and safety policies and procedures.
- **Wear** and **use** the protective equipment required by their employer.
- **Work** and **act** in a way that won't hurt themselves or anyone else.
- **Report** any hazards or injuries to their supervisor.

Employers must NOT take action against workers for following the law and raising health and safety concerns.

➤ Employers must:

- **Make sure** workers know about hazards and dangers by providing information, instruction and supervision on how to work safely.
- **Make sure** supervisors know what is required to protect workers' health and safety on the job.
- **Create** workplace health and safety policies and procedures.
- **Make sure** everyone follows the law and the workplace health and safety policies and procedures.
- **Make sure** workers wear and use the right protective equipment.
- **Do everything** reasonable in the circumstances to protect workers from being hurt or getting a work-related illness.

➤ Supervisors must:

- **Tell** workers about hazards and dangers, and respond to their concerns.
- **Show** workers how to work safely, and make sure they follow the law and workplace health and safety policies and procedures.
- **Make sure** workers wear and use the right protective equipment.
- **Do everything** reasonable in the circumstances to protect workers from being hurt or getting a work-related illness.

In case of injury or illness at work

1

Get medical help

Your employer is responsible for providing first aid. See a doctor or go to a hospital if you need treatment. Your employer pays for your transportation on the day of injury.

2

Document

Tell your employer about your injury or illness. They keep a record of what happened.

3

Report to the WSIB

You can scan the QR code below or visit wsib.ca/reporting and follow the steps to submit a Worker's Report of Injury/Illness (Form 6). Your employer must report an injury or illness to us within three business days.

4

Work together

We work with you and your employer to help you recover and return to work safely, at the right time.



Scan the QR code or visit wsib.ca/reporting to submit a Worker's Report of Injury/Illness (Form 6).

Questions? We're here to help.

Sign up for our online services to send us a message anytime, anywhere, or call us at 1-800-387-0750 or TTY: 1-800-387-0050.

Visit wsib.ca/online-services for details.





WHMIS Pictograms

Workplace Hazardous Materials Information System

Flame

Aerosols
Chemicals Under Pressure (flammable)
Flammable
In Contact with Water, Emits Flammable Gases
Organic Peroxide
Pyrophoric
Self-Heating
Self-Reactive



Flame over Circle

Oxidizer

Exploding Bomb

Explosive*
Organic Peroxide (severe)
Self-Reactive (severe)

Gas Cylinder

Chemicals Under Pressure
Gas Under Pressure

Corrosion

Serious Eye Damage
Skin Corrosion
Corrosive to Metals

Exclamation Mark

Acute Toxicity (harmful)
Irritation (skin or eyes)
Skin Sensitization
Specific Target Organ Toxicity (drowsiness or dizziness, or respiratory irritation)
Hazardous to the Ozone Layer*

Environment

Aquatic Toxicity*

Skull and Crossbones

Acute Toxicity (fatal or toxic)

Biohazardous

Biohazardous Infectious Materials

Health Hazard

Aspiration Hazard
Carcinogenicity
Germ Cell Mutagenicity
Reproductive Toxicity
Respiratory Sensitization
Specific Target Organ Toxicity

A pictogram appropriate for the hazard

Physical Hazards Not Otherwise Classified
Health Hazards Not Otherwise Classified

No pictogram is assigned to some hazard classes, for example, Combustible Dusts and Simple Asphyxiants, and some less severe hazard categories. Chemicals Under Pressure, Categories 1 and 2 must be represented by both a flame and a gas cylinder pictogram. Self-reactive substances and mixtures (Type B) and Organic peroxides (Type B) must be represented by both a flame and an exploding bomb pictogram.

*Not required by WHMIS, but may be used.

Occupational Health and Safety Policy

Prepared on: March 11, 2024

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Used By: Entire Top Defence Security Services Inc.

Top Defence Security Services Inc. (TDSS) is fully committed to providing and maintaining a safe and healthy workplace for all employees, supervisors, managers, contractors, suppliers, and visitors. Protecting our workers from occupational injuries and diseases is one of our highest priorities and a core component of our daily operations.

As the employer, TDSS is ultimately responsible for worker health and safety. TDSS will take every reasonable precaution to create and maintain accident-free workplaces, in strict compliance with the Occupational Health and Safety Act (OHSA) and all other applicable federal, provincial, and local legislative requirements. Our health and safety policy is an integral part of our overall Health and Safety Program and must be followed by everyone at all levels of the organization.

Supervisors are responsible and accountable for ensuring that:

- Workers under their supervision are trained, competent, and working in compliance with safe work practices and procedures.
- Machinery, equipment, and materials are maintained in a safe condition.
- Hazards are identified, reported, and controlled to reduce risk.

Every worker has the duty to protect their own health and safety by:

- Following established health and safety rules, safe work practices, and hygiene standards as required by legislation.
- Reporting any hazards, unsafe conditions, or health and safety concerns to their supervisor immediately.

TDSS is committed to ongoing education and training to ensure that workers have the information and supervision they need to perform their work safely. In addition, TDSS considers the health and environmental impacts of cleaning chemicals, follows proper waste management and recycling procedures, and works to minimize environmental pollution and potential hazards.

All employees, contractors, and visitors must follow TDSS's health and safety rules, comply with the law, and work safely while on site. Visitors must sign in upon arrival, and contractors must review and follow TDSS's safety rules before starting work. Health and safety is a shared responsibility, from the Chief Executive Officer to every worker. By working together, we can reduce risks, prevent injuries, and maintain a safe workplace for all.



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Kana Selva

Chief Executive Officer

Top Defence Security Services Inc.

WORKPLACE VIOLENCE AND HARASSMENT POLICY
BILL 168 - ONTARIO



Prepared On: March 11, 2024

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Purpose

Top Defence Security Services Inc. (TDSS) is committed to workplace health, safety and security for all employees, contractors, customers, and visitors. TDSS proclaims a "zero-tolerance" for harassment and violence in the workplace.

Definitions

"Workplace harassment" means 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.

Examples of prohibited harassment will include verbal conduct such as bullying, epithets, derogatory jokes of comments, slurs or unwanted sexual advances, invitations, or comments; transmitting or display of derogatory and/or racially/sexually oriented cartoons, pictures, drawings, posters, or photographs.

Workplace harassment will not, however, include properly discharged supervisory and management responsibilities including disciplinary action, management of performance and other conduct that does not interfere with a climate of understanding and respect for the dignity and worth of our employees.

"Workplace violence" means (a) the exercise of physical force by a person against a worker in a workplace that causes, physical injury to the worker; (b) an attempt to exercise physical force against a worker in a workplace that could cause physical injury to the worker; and/or (c) any statement or behavior that it is reasonable for a person to interpret as a threat to exercise physical force against them in the workplace, that could cause physical injury to the worker

Examples of violence include, but are not limited to:

- Intentional physical contact for the purposes of causing harm (such as slapping, stabbing, punching, striking, shoving or other physical attack.)
- Menacing or threatening behavior (such as throwing objects, pounding on a desk, door, or other surface, damaging property, stalking, or otherwise acting aggressively; or making oral or written statements specifically intended to frighten, coerce, or threaten) where a reasonable person would interpret such behavior as constituting evidence of intent to cause harm to individuals or property.
- Possessing firearms, imitation firearms, knives or other dangerous weapons, instruments or materials or utilizing an item as weapon or threatening to do so.

Responsibilities

All employees of the TDSS have the right to work in an environment free from violence. To support the TDSS's goal of "zero-tolerance", TDSS has developed the following responsibilities:

Employees

- TDSS will not tolerate violent behavior from its employees, contractors, visitors, or customers.
- Each employee is responsible for helping to create an environment that is free from workplace violence.
- All employees shall be made aware of this policy. TDSS will make every attempt to communicate its commitment to non-violence and "zero-tolerance" of non-conforming behavior.
- Incidents of workplace violence, threats of workplace violence, or observations of workplace violence are not to be ignored by any member of TDSS. Workplace violence must be promptly reported to a supervisor, manager, or Human Resources.
- Any person experiencing or witnessing imminent danger or actual violence involving weapons or personal injury should call for medical assistance and/or 911 immediately and complete TDSS Violent Incident Form.
- Any incident shall be investigated promptly, fairly, and effectively. Individuals who believe they have been victims of a crime have the right and are encouraged to file a complaint with the appropriate law enforcement agency.
- TDSS at the request of an individual, or at its own discretion, may prohibit members of the public, including family members from seeing an employee on TDSS property unless necessary to conduct TDSS related business. This particularly applies in cases where the employee suspects that an act of violence will result from an encounter with said individual(s).
- In every case, particularly those involving a domestic situation (including domestic violence), any employee who has received a protection order preventing contact from or restraining access by other terms and the identity of the individual being restrained.
- The threat of domestic violence coming to the workplace must be assessed by TDSS if its supervisors or managers are made aware of the potential threat. The circumstances may include the spouse, partner, relative or acquaintance of a worker being threatened with violence and the possibility of an individual arriving in the workplace. If a manager or supervisor becomes aware of a potential threat, reasonable precautions will be taken to safeguard all workers.

Reporting Procedures

Complaints of violence should be reported immediately to a supervisor, manager, or a member of Senior Management. Complaints can be made in person, through an email or telephone and documented on TDSS Violent Incident Report Form. When complaints are brought forward it is imperative that all parties involved maintain confidentiality to protect the privacy of all individuals. TDSS must disclose, but only to the extent necessary to protect the worker from personal injury, information relating to a risk of violence from a person with a history of violence behavior if the worker can be expected to encounter that person in course of his/her work and the risk of workplace violence that is likely to expose the worker to physical injury. In all other cases, the disclosure of personal information may be necessary, but it will be limited to what is reasonably necessary to protect the worker from physical injury and to appropriately investigate an alleged breach of this policy.

GUIDELINES FOR INTERNAL COMPLAINTS PROCEDURE

Introduction

TDSS will investigate every situation where an issue of violence or harassment has been brought to their attention as well as all formal written complaints. Employees are responsible for cooperating fully with the investigation procedures.

To the extent reasonably possible, confidentiality will be maintained, however disclosure of information may be required to complete the investigation. All records of complaints including contents of meetings, interviews and results of investigations will be kept confidential by TDSS except where disclosure is required by any disciplinary or other remedial process.

Sequence Of Events

These guidelines outline the sequence of events to be followed when an employee of TDSS brings forward a complaint of violence or harassment. An individual, who considers that they have been subjected to harassment, violence, or retaliation for having brought forward a complaint of harassment or violence, is referred to as the "complainant". The individual against whom the complaint has been brought will be referred to as the "respondent".

1. When an employee is unsure whether certain behavior constitutes harassment or violent behavior, he or she is encouraged to seek assistance from a supervisor or employee representative before laying a formal written complaint. The employee should be advised that situations discussed with supervisors or with employee representatives may not be held confidential if an investigation is warranted. The mandate for supervisors and employee representatives is to act upon knowledge of any situation that may constitute violence.
2. When the problem can be handled informally through discussions among the persons involved, employees are encouraged to seek resolution of harassment issues without formal intervention.
3. When the complainant feels uncomfortable bringing the matter directly to the attention of the employee responsible, or when it is attempted and does not produce a satisfactory result, the complainant should bring the matter to the attention of their immediate supervisor. If the complainant is uncomfortable reporting the matter to his/her immediate supervisor, he or she should contact the Senior Management of their Region.
4. If an employee believes a co-worker is facing harassment, violence, or retaliation, they should report it to their immediate supervisor or, if uncomfortable, to Senior Management in their region.
5. Upon receipt of a harassment complaint, a supervisor or designate from the Senior Management will immediately respond with a plan of action to the complaint. This person may meet with the complainant and/or the respondent and may subsequently proceed with a formal complaint procedure. During this stage, all the information concerning the complaint is kept confidential and is not placed in either the complainant's or the respondent's record of employment.
6. The supervisor or designate from the Senior Management, upon completing initial meetings will discuss their findings with the complainant. Should the complainant decide not to lay a formal complaint, the supervisor or designate from the Senior Management must decide whether to lay a formal complaint even though his or her decision is contrary to the wishes of the complainant. The decisions should be based on the degree of severity of the incident(s) and the assessment as to whether some milder form of intervention may suffice. The decision to proceed or not to proceed must be documented.

7. Should a formal complaint procedure be required, an investigator, appointed by the Senior Management in collaboration with the of the General Manager, will take immediate steps to review a potential complaint and the respondent without delay; interview witnesses identified by either party; and record all information in a complete and precise manner. The investigator will assist the complainant in drafting a statement of complaint is so requested.

8. As soon as the decision is taken to appoint an investigator, the Senior Management shall notify the President that an investigation is underway and shall notify the supervisors of the parties to the complaint that an investigation is underway.

9. Where the investigator decides that the evidence and the surrounding circumstances are such as to require the laying of a formal complaint, the investigator will:

- Inform the complainant of the action being taken.
- Issue a formal written complaint and sign it him or herself.
- Provide copies of the complaint, along with a copy of this policy to the compliant and the respondent.

10. A written report including recommendations will be submitted to the General Manager within three weeks after the complaints submitted to the General Manager within three weeks after the complaint has been submitted.

11. Within two weeks following reception of the written report and based on the inquiry and the written report, the President will determine if the respondent is responsible for a breach of this policy and whether disciplinary measures should be imposed. Disciplinary measures range from reprimand to dismissal.

12. When a determination that this policy has been breached is substantiated, the recommended remedial actions will be recorded in a report prepared by the President.

13. When the President decides that complainant(s) has/have knowingly pursued an unfounded complaint, (one where an investigator finds evidence that the alleged incident could not have happened or the complainant was using the process to discredit another individual), a disciplinary response may be taken against those complainants where evidence indicates their complaint was unfounded or for a malicious purpose.

Consequences:

Anyone violating this policy may face disciplinary action, up to dismissal. Employees who make false or malicious complaints may also be disciplined, while good-faith complaints are protected. Retaliation against anyone reporting, witnessing, or participating in an investigation is prohibited and may lead to discipline, including termination. TDSS reserves the right to modify any policy at any time.



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Kana Selva
Chief Executive Officer
Top Defence Security Services Inc.

Accessibility Policy

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Approved By: Chief Executive Officer

Used By: Entire Top Defence Security Services Inc.

PURPOSE

Top Defence Security Services Inc. (TDSS) is committed to upholding and exceeding Ontario's legislation intended to remove barriers to accessibility for persons with disabilities. This includes providing equal access to employment, information, goods, and services, and treating persons with disabilities with dignity and respect in a way that takes their disability into account.

DEFINITIONS

Definitions taken from the *Accessibility for Ontarians with Disabilities Act*, S.O. 2005, C. 11 or *Ontario Human Rights Code*.

"Accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

"Barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or a practice; ("obstacle").

"Disability" is defined broadly by the *Ontario Human Rights Code* as:

1. "any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
2. a condition of mental impairment or a developmental disability,
3. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
4. a mental disorder, or
5. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997."

POLICY

Top Defence Security Services Inc. (TDSS) will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication
2. Employment
3. Customer Service
4. Design of Public Spaces
5. Transportation

TDSS will provide training to all employees, volunteers, and independent contractors to ensure they are familiar with our policies, practices, and procedures for communicating with and providing services to persons with disabilities.

Information and Communication

TDSS will make its information accessible to people with disabilities by creating materials and supports in accessible formats, and it will notify the public of the types of accessible formats provided.

Further, TDSS will deliver alternate formats of information to clients, upon request. If a particular material cannot be converted into an accessible format that meets the needs of the person requesting it, TDSS will provide details of why it cannot be converted and provide a summary of the information or communication in another way that is suitable to the person requesting it.

This extends to any emergency procedures or safety information prepared by TDSS

Employment

TDSS welcomes and encourages employment applications from people with disabilities and will do its part to make hiring and employee support practices more accessible by providing accommodation during all stages of recruitment, hiring, and employment.

If a job applicant requests accommodation, TDSS will consult with the applicant and provide suitable accommodation that takes the person's accessibility needs into account.

When making offers of employment, TDSS will notify the successful applicant of its policies for accommodating employees with disabilities.

New employees will be reminded about the organization's job accommodation policies as soon as possible upon being hired and notified when any future changes are made to policies. Policy and practice information will include available employment accommodations that will be provided for job related matters such as performance management, career development, emergency response plans, and return to work information.

TDSS will consult with an employee who requests it, to provide or arrange for the provision of accessible formats and communication supports that take the employee's needs into account when providing information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

Customer Service

TDSS will provide customer service in a manner that removes barriers for people with disabilities according to the following key principles of the AODA:

- Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Service to people with disabilities will be integrated with others, unless an alternate way of providing the goods, service or facility is required by the person with the disability.
- Persons with disabilities will be given equal opportunity to use and benefit from the goods, services, or facilities an organization or business has to offer.
- We will communicate with people with disabilities in a way that takes the individual's disability into account.

Assistive Devices, and Service Animals, Service Dogs or Guide Dogs

Persons with disabilities who use an assistive device will be permitted to use their own device to access the goods and services of TDSS.

If a person with a disability is accompanied by a guide dog or other service animal, TDSS shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.

Support Workers

If a person with a disability is accompanied by a support person, TDSS will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

TDSS will ensure that notice is given in advance if admission fees will be charged to support workers for accessing the goods or services in their role as support person, including how much the fee will be.

Service Interruptions

If there is a temporary disruption in any of our services either in whole or in part, TDSS will provide notice of the disruption to the public via as many channels as possible, in accessible formats, where available. We will physically post notices where the disruption is taking place as well as through any other channels that are appropriate such as email, phone, text, social media, or on our website.

Notice of the disruption will include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

Process for Receiving Feedback

TDSS will accept feedback about the way in which it provides goods and services to persons with disabilities in person, by phone or email, or in another way that is suitable to a person with a disability.

When a complaint is received about the way we provide goods, services, or facilities to persons with disabilities, TDSS will let the person who submitted the feedback know about the actions the organization will take to resolve the issue.

Design of Public Spaces

If TDSS redesigns or redevelops an outdoor public space such as a parking area, outdoor eating area or play space, exterior path of travel, recreational trail or beach access route, or an indoor or outdoor service counter, waiting area or queuing line, it will do so in accordance the Design of Public Spaces Standard of the AODA. TDSS will also ensure any newly redesigned or redeveloped areas are maintained in accordance with the rules set out by the AODA.

Transportation

TDSS does not provide conventional or specialized commercial transportation services to passengers and is not required to adhere to the Transportation Standard.



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Kana Selva
Chief Executive Officer
Top Defence Security Services Inc.

Disconnecting from Work Policy

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Top Defence Security Services Inc. (TDSS) is committed to taking every precaution reasonable in the circumstances for the protection of the health and safety of workers, as required by the Occupational Health and Safety Act. TDSS is also committed to providing a supportive workplace that promotes and supports stress-reduction and mental health. Additionally, TDSS is committed to ensuring that its employees are able to maintain an appropriate work/life balance and fulfill their family responsibilities.

SCOPE

This policy applies to all employees of TDSS whether their primary location of work is in the workplace, at home, on the road, or a combination of any or all of the above.

DEFINITIONS

As defined in the Working for Workers Act, “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.

POLICY

Employment Standards Time Away from Work

The Employment Standards Act, 2000, (ESA) specifies that employees are not to perform work during the following times:

- Outside of their hours of work and eating periods
- During vacation with pay
- During public holidays (unless the employee has agreed to work on the day of a public holiday in accordance with the ESA)
- The rules in Ontario Regulation 285/01 that establish when work is “deemed” to be performed

Mental Health in the Workplace

TDSS is vitally concerned with the health and wellbeing of our employees’ health, both physical and mental. The organization strongly encourages our employees, especially those who are participating in remote work arrangements to adapt and maintain a good work/life balance.

TDSS wishes to encourage employees to come forward if they are experiencing any health issues, especially issues related to mental well-being. If an employee feels comfortable doing so, they should talk to their manager/management team and/or take steps to seek professional help.

CONNECTION AND DISCONNECTION EXPECTATIONS

Email

Employees are expected to follow the below guidelines regarding the use of TDSS's email systems. These guidelines also apply if an employee needs to use their personal email in the event of an emergency or an unforeseen circumstance.

Employees are expected to respond to emails during their designated working hours only. TDSS does not have an expectation that employees will respond to emails during their off-work time and employees will not be penalized in any way for responding to emails only during their working time.

To ensure that these guidelines are not compromised, TDSS needs to be aware of when employees are on work time and when they are not. This means that employees need to (Insert method, e.g., update Google calendar, email their supervisor, put on an out-office on their email) when they will not be working during TDSS's core hours.

Response Time for Emails

- Employees are expected to respond to emails received during the workday, up to 30 minutes prior to the end of the workday, on the same day whenever possible.
- Emails received during after-hours Monday through Thursday are expected to be replied to within 24 hours of their receipt.
- Emails received after-hours on Friday, Saturday, or Sunday are expected to be replied to on the Monday following, unless the employee is not working, in which case they may be replied to on the next working day.

In the event that an employee is unable to reply within these guidelines, they are expected to speak with their supervisor to discuss their workload and set updated expectations.

Out of Office

Employees are expected to regularly update their out-of-office automatic emails so that the most up-to-date information will be communicated to those who are emailing them outside of their work hours.

Phone

Employees are expected to respond to phone calls or text messages during their designated working hours only. TDSS does not have an expectation that employees will respond to phone calls or text messages during their off-work time and employees will not be penalized in any way for responding to phone calls and text messages during their working time only.

Response Time for Phone Calls, Voicemails, and Text Messages

- Employees are expected to respond to phone calls, voicemails, and text messages received during the workday, up to 30 minutes prior to the end of the workday, on the same day whenever possible.
- Phone calls, voicemails, and text messages received Monday through Thursday after-hours are expected to be replied to within 24 hours of their receipt.
- Phone calls, voicemails, and text messages received after-hours on Friday, Saturday, or Sunday are expected to be replied to on the Monday following, unless the employee is not working, in which case they may be replied to on the next working day.

- In the event that an employee is unable to reply within these guidelines, they are expected to speak with their supervisor to discuss their workload and set updated expectations.

Other Communication Channels

Employees may use various other means of communication for work such as Slack, Google meet, Social Media platforms, Zoom etc. Employees are only expected to respond to work related messages on these platforms during their designated working hours. TDSS does not have an expectation that employees will respond to messages, comments, meeting invitations etc. during their off-work time and employees will not be penalized in any way for only replying to them during their working time.

Responsibilities

Employees are expected to:

- Follow the guidelines outlined within this policy, such as notifying management and using applicable technologies to notify internal and external parties when they are off duty.
- Otherwise, be working during the times set out in their employment contract, taking breaks as outlined in their employment contract and/or their core policies.
- Not pressure fellow employees for taking the down time afforded to them by law.
- Speak to their leader/manager if they have any concerns about their mental health and their right to disconnect from work.

Supervisors/managers are expected to:

- Respect an employee's off-duty time and not expect that an employee will respond to a request on their off-duty hours.
- Compensate employees for any work completed outside of their on-duty hours, as outlined by the hours of work legislation in Ontario's Employment Standards Act.
- Provide support as needed to employees who come forward with concerns regarding their mental health and right to disconnect.

Complaints

Employees who have concerns about disconnecting during their time away from work should first speak with their supervisor/manager to resolve the issue. In the event the issue is not able to be resolved at this level, employees are directed to bring the issue forward to Human Resources department at hr@ktgroupcanada.ca.



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Kana Selva
Chief Executive Officer
Top Defence Security Services Inc.

Electronic Monitoring Policy

Date Issued: March 11, 2024

Revised Date: March 10, 2026

Issued By: Health & Safety Committee

Approved By: Chief Executive Officer

Used By: Entire Top Defence Security Services Inc.

Top Defence Security Services Inc. (TDSS) is committed to abiding by all of its obligations under Ontario's Employment Standards Act, 2000 (ESA), specifically those which apply to electronic monitoring. As such, TDSS is committed to informing its employees about the presence of electronic monitoring software or equipment either in the workplace or contained on any of the organization's servers or programs. This policy is based on Bill 88: Working for Workers Act, 2022 and is subject to change as per any new information provided by the Government of Ontario.

This policy offers standards to ensure the following:

- Employee safety and security;
- That the company operates efficiently; and
- That appropriate data is collected to make informed business decisions, as needed.

SCOPE

This policy applies to all employees of TDSS who are covered by the Employment Standards Act, whether their primary location of work is in the workplace, at home, on the road, or a combination of any or all of the above. The policy covers all electronic monitoring systems deployed by TDSS at various locations.

POLICY

Pursuant to the Employment Standards Act, 2000 (ESA), employers are obligated to disclose electronic monitoring practices to employees; however, the ESA does not confer any right to privacy, exemption from monitoring, or the ability to contest the manner in which monitoring is conducted or information is used. All inquiries regarding electronic monitoring are to be directed to Human Resources in accordance with company policy.

Electronic Monitoring Systems and Their Purpose

TDSS has the following electronic monitoring equipment in place in the workplace:

- 1) Email monitoring software: All email communications sent using company-owned networks, equipment, or user accounts are monitored, and this may include personal email accounts accessed through company-owned IT assets.
- 2) Video cameras and recording equipment for public areas: Video surveillance technology is used on company premises to deter theft, vandalism, and ensure employee safety. Should illegal conduct be uncovered, video surveillance footage may be disclosed to approved third parties. Bathrooms, changing rooms, and other private spaces do not have video surveillance. Video surveillance equipment will be clearly visible and marked with notices and does not include audio.

- 3) Internet and app activity monitoring, including downloaded documents and accessed websites, etc.: TDSS monitors employee network and computer activities to verify that company-owned IT resources are used only for work-related or professional activities. Computer activity data can evaluate employee performance, detect malicious or high-risk behaviours, monitor network performance, and avoid security incidents.
- 4) Keystroke trackers for keyboards: TDSS uses keystroke trackers to monitor employee activity while they are working remotely.
- 5) Recording equipment on all phones for external calls: TDSS records all external calls to ensure that customer service and satisfaction are at optimal levels. These records also help to improve internal processes.
- 6) GPS monitoring is in place in company vehicles which tracks both geography, time, speed, etc.: TDSS has GPS monitors in place in company vehicles to ensure employee safety and security and to send help if an employee is ever in danger. These records may also be accessed in the event of an accident.
- 7) Key card monitoring: For monitoring access to the building and/or restricted areas to prevent unauthorized access, theft, or other illegal activities and thereby ensure employee safety and security.

Data Retention

All data obtained by workplace monitoring will be retained digitally on the servers with password protection and firewall protection, and will be retained for no longer than 3 years, as per privacy law. Personal information will only be held longer in extraordinary circumstances or by law.

Retention of this Policy

TDSS will ensure that copies of this policy, including any subsequent revisions, are retained for a period of three years after the policy ceases to be in effect.


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Kana Selva
Chief Executive Officer
Top Defence Security Services Inc.

ATTENDANCE AND RETURN TO WORK POLICY

Top Defence Security Services Inc. is committed to ensuring that all its employees are appropriately compensated for their hours of work and to ensuring that every reasonable effort is made to ensure continued communication with employees while on extended leave. This policy outlines our expectations for employees with regards to their time and attendance and communication with the company.

Top Defence Security Services Inc. expects everybody to be punctual and follow the schedule agreed upon between the organization and the employees.

POLICY

Top Defence Security Services Inc. employees have the responsibility of attending work at their scheduled time or providing as much notice as possible in the event they are unable to arrive at the start of their shift. Employees are to call in and emailing their supervisor, and applying leave request in the ERP system (Pro Guard) if they will not be present. If employees need to leave their shift early, they must provide as much notice as possible to their supervisor.

Prolonged Absences

If an employee requires an absence for a prolonged period of time, Top Defence Security Services Inc. may request additional information from an employee's medical provider regarding the projected length of their absence. Top Defence Security Services Inc. will not request confidential medical information, including any diagnosis, etc., from the medical provider.

Long Term Absences

Long term absence is when an employee is unable to work for a lengthy period of time, or any absence of more than two weeks. These absences do not include legislated leaves of absence under the employment standards code.

Top Defence Security Services Inc. will conduct a thorough investigation into the cause of the absence, which will entail gathering medical evidence and discussions with the employee to increase understanding. The following topics would be covered during the discussion:

- The employee's projected return to work date
- Arrangements for additional medical reviews and discussions
- Any medical reports provided to the management of Top Defence Security Services Inc.
- Whether or not the employee is permanently disabled, as per the doctor and/or the insurance provider
- Whether or not the employee can return to their previous job with or without changes or accommodations
- Any other possibilities, such as redeployment
- Any plans for the return-to-work process

As appropriate, employees will be requested to provide a Fitness for Work form prior to their return from a long-term absence. If the absence was due to a work-related injury or illness, the workers' compensation guidelines for the province of employment will be followed.

Record of Employment (ROE)

The company will issue an ROE for any absences that last longer than 7 calendar days. The ROE will reflect the reason that the employee is absent using the codes provided from the Government of Canada.

Communication

During a long-term absence from work, Top Defence Security Services Inc. will ensure that continued communication is occurring, including by checking on the employee on the dates set out by the medical professional, informing the employee of significant occurrences in the workplace, and coordinating the return-to-work process once the employee has been cleared to return to the workplace.

Three Consecutive Absences

Any case where an employee misses at least three consecutive shifts without providing notice to their supervisor is considered job abandonment and the employee's relationship with Top Defence Security Services Inc. will be severed. If an employee can provide adequate reasoning behind their absence, their employment may be continued at the organization's discretion.

Absenteeism

Absenteeism refers to a deliberate pattern of absences or late-arrivals that need to be corrected in order to ensure that Top Defence Security Services Inc. is able to adequately staff its premises and achieve its organizational goals. Employee absences without reasonable cause affect the company's ability to achieve those goals. Repeated absences or tardiness considered as absenteeism refer to absences or tardiness because of:

- Sleeping in late
- Having personal social plans when scheduled for work
- Leaving early every Friday without reasonable cause
- Arriving late every Monday morning without reasonable cause
- Failing to catch a regularly scheduled method of public transportation such as a bus
- Extending a weekend without approval (e.g., not attending work on a Monday or a Friday for unjustified reasons)

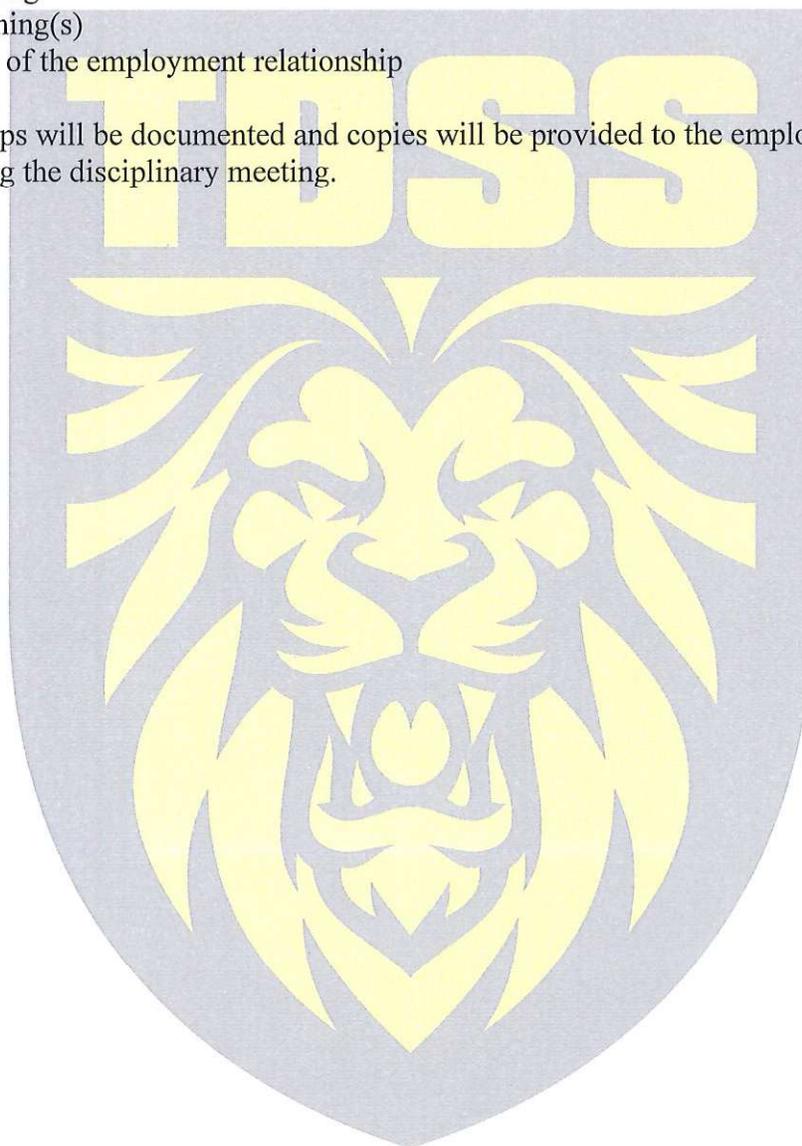
This is not a comprehensive list. Employees are expected to attend work unless an emergency arises or they are ill and cannot present themselves.

Disciplinary Steps

In the case of an excessive number of absences, late shift arrivals, shifts left early, or if a pattern of absenteeism presents itself, Top Defence Security Services Inc. will first meet with the employee to determine whether there is a workable solution to the attendance exceptions. Employees have a responsibility to do their part to work towards a solution and abide by the terms of the attendance agreement. If the attendance exceptions continue without reasonable cause and/or notice, Top Defence Security Services Inc. will institute the corrective action process following these three steps:

1. Verbal warning
2. Written warning(s)
3. Termination of the employment relationship

Each of these steps will be documented and copies will be provided to the employee to read and understand during the disciplinary meeting.



EMPLOYEE PHOTOS AND VIDEOS USAGE POLICY

Policy Guidelines:

1. Consent and Authorization:

- a) Obtaining written consent from employees is mandatory before capturing or using their Photos and Videos. Consent forms will clearly state the purpose of photo usage, the intended platforms, and the right to withdraw consent at any time.
- b) Consent will be specific, informed, and voluntary, in line with the requirements of Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

2. Purpose of Photo Usage:

- a) Employee Photos and Videos will solely be used for official company purposes, including the company website, official social media accounts, internal communications, marketing materials, and other legitimate business publications.
- b) Employees should be aware that their Photos and Videos will remain on these platforms even after they leave the company, as a historical representation of our workforce.

3. Photo Capturing:

- a) Photos and Videos will be captured in a professional and respectful manner, prioritizing employee comfort and privacy.
- b) Employees will be informed about the purpose of the photo session, and their input on scheduling and location will be considered where possible.
- c) Photos and Videos will not depict employees in compromising or inappropriate situations.

4. Photo Editing and Distribution:

- a) Photo editing will be limited to basic enhancements that maintain the authenticity of the images (e.g., cropping, resizing, color correction).
- b) Photos and Videos will be securely stored to prevent unauthorized access and distribution.
- c) Sharing of Photos and Videos will be restricted to approved company platforms and accounts.

5. Diversity and Inclusion:

- a) Employee Photos and Videos will accurately reflect the diversity and inclusivity of the workforce, refraining from promoting discrimination or bias.

- b) Cultural and religious sensitivity will be exercised during photo capture and usage.

6. Employee Rights and Privacy:

- a) Employee Photos and Videos will not be shared with external parties or organizations without explicit consent.
- b) Personal contact details or sensitive information will not be linked to employee Photos and Videos.

7. Withdrawal of Consent:

- a) Employees maintain the right to withdraw their consent for photo usage at any time. Upon withdrawal, their Photos and Videos will be promptly removed from all company platforms.
- b) Employees who withdraw consent will not face negative consequences or discrimination.

8. Policy Violations:

- a) Breaches of this policy may lead to disciplinary actions as per company policies and Canadian laws.
- b) Individuals responsible for capturing or using Photos and Videos must adhere to this policy and uphold employee rights.

Review and Update:

This policy will be periodically reviewed to ensure compliance with Canadian laws and effectiveness. Updates will be communicated to all employees.

By following this Employee Photos and Videos Usage Policy, we aim to ensure proper representation of employees while safeguarding their rights and privacy in accordance with Canadian regulations.

SOCIAL MEDIA USE AND CONDUCT POLICY

Top Defence Security Services Inc. (TDSS) strives to maintain a positive image on our social media platforms. We are committed to preventing any harm to the organization, its employees, clients, or other involved parties that can arise if social media channels are misused, misrepresented, or abused in a way.

DEFINITIONS

“Social media” means any online websites, communities or social networks that allow users to create and share content, opinions, interests, and other information such as Twitter, Facebook, LinkedIn.

POLICY

TDSS is very thoughtful about its branding. The organization and its employees must work together to ensure TDSS is represented in a positive manner on social media. As such, only designated representatives are permitted to speak on behalf of TDSS on social media. Employees who link themselves to TDSS on social media by commenting on or about or liking or sharing information regarding KT Group, must use professionalism and respect.

The following guidelines have been established to protect KT Group, and must be adhered to by employees:

- The use of personal social media on company time is not permitted, unless on approved breaks or as a function of the employee’s job duties.
- TDSS has a zero-tolerance policy for any form of discriminatory comments based on gender identity, race, age, religion, ethnicity, sexual orientation, disability, or any other legally recognized protected status.
- TDSS has a zero-tolerance policy for online bullying or other threatening behaviour.
- Sensitive financial, operational, legal or client data or information is not permitted to be shared on social media.
- Employees must recognize that this policy applies to not only company directed social media actions but also personal use of social media in regards to anything that may harm or damage the organization.
- Employees are encouraged to associate themselves to the organization on social media but may not act as official representatives (or speak on its behalf) unless authorized by the organization or management.
- The company’s social media may not be used to promote personal blogs, websites, or services as this is a conflict of interest and is not permitted.
- Use common sense when posting. Where there is doubt about the appropriateness of a post and how it may be viewed by others, do not post it until the content has been approved by your manager or supervisor.
- If something inappropriate/ not permitted does get posted by you or someone else, immediately delete the post, if possible, and consult your manager/supervisor immediately in case further action is required to mitigate the situation.

NON-COMPLIANCE

Failure to adhere to the guidelines set out in this policy may result in disciplinary action, including termination.

VACATION POLICY

Vacation time and vacation pay at Top Defence Security Services Inc. (TDSS) are provided according to the following chart:

	Less Than 5 Years of Service	5 or More Years of Service
Vacation Time	Two weeks (10 days)	Three weeks (15 days)
Vacation Pay	4% of gross wages	6% of gross wages

Vacation pay will be at least four percent of the gross wages (excluding any vacation pay) earned in the 12-month vacation entitlement year or stub period for employees with less than five years of employment, and at least six per cent of the gross wages thereafter. Vacation time may be taken after it has been accrued in the previous 12-month vacation entitlement year. It must be taken within 10 months of being accrued.

Vacation Time

Vacation time may not be carried over into the following year and must be taken within 10 months of it having been accumulated. TDSS reserves the right to schedule employee vacations if the time needs to be used prior to the year's end. While the organization will make every effort to consider an employee's desired vacation time away, there may be occasions when employees will not receive their desired time. In accordance with the ESA, TDSS will not schedule any vacation time for less than one week at a time.

Maternity or Parental Leave

For the duration of a maternity or parental leave, vacation time only will accrue; vacation pay does not accrue during this time away.

Public/Statutory Holidays and Sick Days

Should a public/statutory holiday fall within an employee's vacation time, they are entitled to an extra day away following their scheduled vacation. Sick days taken during a vacation do not qualify the employee to another day off with pay following their scheduled vacation.

Vacation Requests

Employees are requested to speak with their manager or supervisor at least 3 weeks prior to request vacation and apply vacation request through the ERP system (Pro Guard). TDSS reserves the right to schedule vacation for employees to ensure the smooth operation of the business and that all vacation time is used prior to the end of the year.

Termination of Employment

If employment is terminated prior to an employee taking their vacation time, it will be paid out to them on their final pay cheque along with any other owed amounts.

DRESS CODE POLICY

UNIFORM AND HYGIENE

Purpose:

This policy aims to establish clear guidelines for the attire of staff, ensuring that employees maintain a professional and polished appearance that aligns with the company's image and work environment.

- Employees are required to wear business formal attire along with the uniform and safety attires provided.
 - Safety shoes are mandatory.
 - Attire should be professional, neat, and appropriate for the work setting.
 - Clothing should be clean, pressed, and free of rips or stains.
- Clothing must be appropriate and professional, reflecting the standards of the workplace and company culture.
- The company may announce occasional casual days for special events, at which employees may wear more casual attire. Employees will be notified in advance

UNIFORM AND HYGIENE

Top Defence Security Services Inc. (TDSS) requires all employees to present themselves in a professional manner when representing the Company. It is always important that the professional image of the organization be maintained, even on casual days, as our employees' own presentation is a direct reflection of TDSS. The purpose of this policy is to outline our expectations for employee attire, personal hygiene, and appearance.

Attire

TDSS is a professional firm. Employees who may have in-person contact with customers, whether on our site or when working outside the office are expected to present a professional appearance. We expect employees to follow the TDSS dress code.

TDSS believes that not only do uniforms physically protect employees from harm, but they also provide security. Work uniforms ensure that all persons in any given workspace are identifiable as employees and not customers or outsiders. This is especially important in areas of public safety.

TDSS also expect employees will use appropriate judgement when selecting their work attire, keeping in mind that the following are not acceptable clothing:

- Ripped or torn clothes;
- Clothing and/or tattoos that contain words or images that are racist, violent, and/or clearly inappropriate;

- Clothing that is revealing and skin tight without appropriate coverage (i.e. a long sweater over yoga pants);
- Dirty or unwashed clothes.

On occasion, management may direct employees to dress in business casual or in business attire (for example, if an important client is attending on-site). In those cases, employees will dress according to the instructions.

Hygiene

Employees are expected to meet hygiene requirements during regular business hours for the duration of their employment.

- Maintain personal cleanliness, oral hygiene, and use deodorant / antiperspirant to minimize body odours.
- No excessive scented perfumes, colognes and lotions. These can cause allergic reactions, migraines and respiratory difficulty for some employees.
- Clean and trimmed fingernails.
- Wash hands after eating or using the restrooms.

Compliance

Failure to meet established grooming, hygiene, and attire standards may result in employee counselling and/or disciplinary action, up to and including termination of employment.

Personal appearance standards may be reviewed periodically and updated as deemed necessary.

Questions pertaining to these guidelines, or the appropriateness of dress and/or hygiene on a given day should be directed to Management.

Some decisions regarding dress code and/or hygiene may have human rights considerations involved. Any such circumstance will be handled on a case-by-case basis, always with adherence to Ontario's Human Rights Code.