

Silversmith Brewing Company  
**EMPLOYEE POLICY MANUAL**  
1523 Niagara Stone Road  
VIRGIL, ONTARIO L0S 1T0



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## INTRODUCTION

This booklet along with any employment offers or arrangements entered between yourself and Silversmith Brewing Company structures your employment agreement with Silversmith Brewing Company (SBC). As an employee of SBC use your best judgment in applying these principles throughout your employment. If you are unsure of the course to follow, the first person you should consult is the President. If for any reason, this is not appropriate, please feel free to bring your concerns to your direct supervisor or any of the people listed on our Contact List located at the back of this document.

The company encourages you to question or to challenge procedures or directives which conflict with your sense of what is right. However, employees are held accountable for their actions. We welcome suggestions you may have of how to better our policies and procedures guide.

Please note that an employee who is found to be in violation of the Employee Policy Manual will be subject to an appropriate level of discipline up to and including termination for cause.

## PRESIDENT'S MESSAGE

We are fortunate to share a unique environment at Silversmith with a dedicated, highly skilled workforce. Each of us brings unique skills and has a measurable and essential contribution to help achieve our common goals. Above all, while working safely, we must focus on continuously achieving quality standards in everything we do in order to meet and exceed our customers' expectations.

The key to our ongoing, competitive advantage, reputation and successful future within our target markets are:

- Treat our clients with respect.
- Ensuring the work we do and that of our fellow employee is performed safely
- Ensure the employees in our company are supported and treated fairly
- Continuously striving for new and more efficient methods and processes within our facility to decrease costs
- Reviewing and enhancing our internal and external business partnerships to strive for greater productivity

We are as strong as our people.

Sincerely,

Kyle Getty  
President

## COMPANY POLICIES

### LAWS AND REGULATIONS

The laws and statutes, which apply to any situation generally, state the minimum acceptable behaviour. The Company's established rules, procedures and forms which have been developed to ensure compliance with the law and a careful adherence to these procedures is generally the best safeguard of legal responsibilities.

While you are acting on behalf of the Company, do not take any action, which you know (or reasonably should know) violates any applicable law or regulation. Ensure that your conduct cannot be interpreted as being in violation of any laws governing the affairs of the Company. If you are unsure of the proper course to follow in regard to legal matters, consult with the President.

Note: Avoid or minimize legal difficulties by seeking advice at the onset of business dealings.

### UPHOLDING THE LAW

At all times, SBC and its officers will do all that the law requires and respect what the law intends.

### ETHICS

The Company's word is its bond. As representatives of the Company, we tell the truth in all our communications and do not mislead by commission or omission.

In all communications (including sales representations and advertising) you must tell the truth and not knowingly mislead directly or indirectly.

*NOTE: This rule is intended to be followed not only in letter but also in spirit.*

Avoid any false statements or statements which mislead by omissions. All material facts regarding Company services or transactions should be disclosed to ensure that our customers are fully informed of the associated costs and benefits. To enable customers to make reasonable judgments regarding the purchase of Company services, you should always provide clear, factual, relevant and honest information to the client. You are expected to make every reasonable effort to avoid errors, omissions or misunderstandings in statements issued by you on behalf of the Company. This applies even if such errors, omissions and misunderstandings might be to the Company's short-term advantage. You must not make promises or commitments which the Company does not intend to keep or cannot keep.

### CONFIDENTIALITY

Certain information about the Company's plans, customers, methods, procedures, and activities are proprietary and confidential. You may not disclose such information outside of the company, without proper authorization. Use good judgment in your social and informal associations with others. There is a risk that you may reveal (knowingly or unknowingly) information about the Company's security measures or other confidential information, which could be used in perpetrating a crime against the Company or against a customer of the Company. In particular, you must not associate with anyone who might reasonably be considered as representing a higher-than-normal risk of engaging in a crime against the Company or its clients.

If you leave the service of the Company, your obligation to safeguard the privacy of clients and employees and to protect the confidentiality of the Company's affairs continues with equal force.

We have an open door policy which encourages employees to discuss issues of concern openly and candidly with any member of management including your Supervisor or the President.

Employees will be assured full confidentiality regarding all issues or concerns discussed. Employees bringing out issues under this policy will not be discriminated against nor will they suffer any reprisal.

We will be honest and open with you and we trust you will do likewise.

Professional misconduct, gross negligence, dishonesty, revealing privy information or other acts detrimental to the company or its employees are cause for immediate dismissal and legal action may be taken against you.

## NON-DISCRIMINATION

In all our dealings we strive to treat people fairly, weighing our responsibilities to all our stakeholders. The Company's business relationships, whether co-operative or competitive, will be pursued freely, fairly and openly. In dealing with employees, clients, suppliers and others, you may not discriminate on the basis of any of the following: race, colour, religion, age, sex, sexual orientation, marital status, family status (national or ethnic origin), conviction for which a pardon has been granted, disability or memberships in any lawful organizations.

NOTE: The only exceptions will be if a "bona fide" occupational requirement has been established in accordance with the Ontario Human Rights Code.

Many decisions in our business are a matter of "feel" and good judgment, with a variety of factors taken into account. Take care to exclude irrelevant considerations, especially when making personnel decisions. SBC is an equal opportunity employer.

## INTEGRITY OF RECORDS

The Company books and records must be maintained with scrupulous integrity, with all transactions recorded in an accurate and timely manner. You may not make any false or artificial entries in any books or records. Make all account entries accurately and in keeping with the highest standards of Generally Accepted Accounting Principles. Do not establish or operate an account or conduct any transactions for any purpose other than the described in the supporting documents.

## REPORTING OF IRREGULARITIES AND DISHONESTY

If you are aware of dishonesty or falsification of records by another employee, or any serious infraction of Company rules (within or outside the Company) you must promptly report the facts to management through your immediate supervisor. If you are unsure of what to do, contact the President immediately and discuss the matter with them. Do not fail to report an irregularity because of a misplaced sense of loyalty toward an individual. The Company will protect you against any recrimination of reporting irregularities

## POLITICAL CONTRIBUTIONS/SOCIAL RESPONSIBILITY

The Company will make only those contributions permitted by law to a political party, candidate or campaign. The contribution must be approved by the President and accurately recorded.

The Company's basic purpose is to serve society by upholding its obligations to shareholders, customers, employees and the public. To do this responsibly, consider all traditional financial factors plus the economic and social effects of the Company actions when you make business decisions. The Company's view of corporate social responsibility means conducting yourself in a responsible manner in all Company operations.

Since the Company accepts accountability for the social and economic effects of its business actions, conscientiously evaluate these factors when you make business decisions. If in doubt, seek the help and advice of senior management.

## PERSONAL CONDUCT

### DRESS CODE AND PERSONAL APPEARANCE

Personal appearance should be a matter of concern for all employees. A neat and tasteful appearance contributes to the professional image of the employee and creates a positive impression on clients and other visitors. You are expected to be dressed and groomed in accordance with acceptable social and business standards during working hours and when representing SBC.

The dress code for all SBC employees is “Beer Casual”. This dress code is intended to maintain our professional and business-like image, in a more casual setting. SBC is a professional services provider and every employee’s attire should reinforce this image.

Please let good judgment be your guide, keeping in mind that appropriate “Beer Casual” always excludes the following:

- Athletic wear (e.g. sweat suits)
- Mini skirts
- Halter or spaghetti strap tops

On occasions, when directed from the President, the dress standard for all of SBC is “Casual”. Although this standard is less formal than the “Beer Casual” environment, employees are still expected to dress in a neat and tasteful manner that conveys a positive image on clients and visitors. More casual attire may be allowed on additional specific occasions.

When meeting with clients the appropriate standard is “Business Casual” attire unless knowledge of the client and their preference leads you to believe that less formal attire is appropriate for the meeting.

If your attire is found to be inappropriate for the workplace, a warning may be issued and you may be required to go home and change into appropriate attire. Should this occur, you will not be paid for the time required for you to return home, change and return to work.

## LANGUAGE

Swearing does not have a place in our facility. Use of profanity in the offices of SBC especially in the presence of customers, suppliers, or other company personnel, will result in corrective and disciplinary action. If you are in a position to receive customer complaints, in-bound calls, or face to face encounters with customers, respond to the situation in a courteous and professional manner. Do not speak in a defensive manner, or make excuses. If you feel the customer is being unreasonable, voice your concerns to your supervisor, never directly to the individual you are dealing with.

## SMOKING

Smoking is prohibited in the workplace of SBC including offices, brewery, vehicles, events and other offsite locations. This includes entrance and exit pathways from all buildings. At SBC we promote the health and wellness of our employees and ask you use good judgment while at any location that represents our Company or our partners as this is a reflection of SBC.

## EMPLOYMENT POLICIES

### CONFLICT OF INTEREST

Any decisions you make in the course of your work for the Company must be:

- Made in an objective manner
- Based solely on the best interests of the Company
- Unaffected by any consideration whatsoever of personal gain or that of anyone personally associated with you (i.e. friend, relative)

Your primary business loyalty is to SBC. Avoid situations in which any personal business interest conflicts with your duties.

You may not acquire (directly or indirectly) any business interest or participate in any business activity outside the Company which would tend to:

- Create excessive demands on your time and attention resulting in the Company not receiving your best performance on the job.
- Create a conflict of interest (i.e. an obligation, interest or distraction which interferes with the independent exercise of judgment in the Company's best interests).

The following are some examples of situations that could result in a conflict of interest or cause a distraction from your Company responsibilities:

- Engage in any other employment, occupation and consulting or other business activity without prior written consent of SBC.
- Becoming an officer of another company
- Engaging in any business outside the Company
- Supplier gifts and entertainment

If in doubt, obtain management approval before serving in any capacity.

## COMPLYING WITH INSTRUCTIONS

You are expected to comply promptly with all instructions received from a supervisor. For any reason, you feel the instruction violates an established Company principle or policy or could result in an imminent, abnormal danger to your health or safety, contact senior management.

## HARASSMENT & VIOLENCE IN THE WORKPLACE POLICY

Providing a work environment at SBC that is free from workplace violence and harassment is everyone's responsibility. This policy applies to all employees of SBC, those engaged in a contract with SBC and to anyone else visiting our workplaces.

"Workplace harassment" means: 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 unwelcomed.

"Workplace violence" means:

The exercise of physical force by a person against a worker in a workplace that causes or could cause physical injury by any individual will lead to disciplinary action up to and including termination of employment or removal from the workplace. In addition, civil or criminal proceedings may also be commenced.

*Violence includes but is not limited to the following:*

- Threats of violence; verbal or electronic
- Intimidation and disruptive behaviour
- Causing physical harm to another person
- Aggressive behaviour that constitutes a reasonable fear of bodily harm to another person
- Verbal assault, causing emotional duress
- Intentional damage or destruction of Company property or its employees
- Possession of a weapon while on Company premises or while conducting Company business

All incidents of workplace violence or harassment are to be reported immediately to your supervisor, who will conduct a confidential investigation of events, take corrective action where warranted and inform management of all findings. We find it necessary to ensure that workers are protected from workplace violence, therefore we will annually reassess the risks that may arise from the type of work or conditions of work performed in the workplace. Violators of this policy by any individual will lead to disciplinary action up to and including termination of employment or removal from the workplace. In addition, civil or criminal proceedings may also be commenced. Although some situations involving workplace violence may be a result of larger societal problems outside of our control, we strongly believe that by working together with our employees and reviewing our policy annually the risk of workplace violence can be minimized.

## CONTROLLED SUBSTANCE / ILLEGAL DRUGS AND ALCOHOL POLICY

No employee may consume alcohol or participate in substance abuse during business hours or come to work under the influence of the same. Employees may not operate any Company vehicle while under the influence. You may not possess, distribute, sell or use illicit drugs on Company premises or client sites. On or off Company premises, you may not encourage, persuade or coerce a fellow employee to engage in illicit drug use or to sell or transfer prescription medication or in any way contribute to such use.

SBC has a “ZERO” tolerance policy relating to drugs.

At certain times, it is understood that mild alcohol consumption will be required as part of the duties of selling, tasting, brewing and other such tasks outlined in the employee’s roles and responsibilities. It is with great judgement on the individual to control and maintain a level of professionalism in this situations. No employee is to operate a motor vehicle, either Company or personal, while leaving SBC under the influence of alcohol.

## ATTENDANCE POLICY

It is vital to the company, you and co-workers that attendance is regular. If you are not able to report for work, it is your responsibility to notify your Supervisor immediately as to the nature and duration of absence. Excessive absenteeism or tardiness is not acceptable for continued employment with SBC.

## ILLNESS

SBC acknowledges that there might be times when you are ill and unable to attend work. For salaried employees, on these occasions, we will undertake to compensate you for the time lost. It is your responsibility to notify your direct Supervisor prior to your regular start time that you will not be in. Further, if you will be off of work for three consecutive days, a doctor’s note is required upon your return to work.

While the company recognizes that people do become ill, employees are expected to be reasonable about illness absences and the company will respond in kind. This benefit is paid when you are unable to attend work due to non-workplace related causes. We ask that personal appointments be scheduled around work. If this is impossible, you are expected to make up missed time.

## WORKING HOURS

Due to the nature of our business, operating hours vary daily and seasonally. Additionally, times of work may vary according to your position in the company. Employees are expected to complete their schedule work allowances. From time to time the company may alter its regularly scheduled working hours.

## STATUTORY HOLIDAYS

SBC observes the following Holidays, yet will remain open to the public unless otherwise noted:

- New Year’s Day
- Family Day
- Good Friday
- Victoria Day
- Canada Day
- Labour Day
- Thanksgiving Day
- Christmas Day (Closed to the Public)
- Boxing Day

Generally, salaried employees qualify for public holiday entitlements unless they fail without reasonable cause to work all of their regularly scheduled day of work before the public holiday or all of their regularly scheduled day of work after the public holiday (this is called the “Last and First Rule”).

## EMPLOYEE EVALUATION

SBC will evaluate the performance of individuals annually based on such factors as knowledge, skills and abilities. These performance factors listed in this evaluation are critical to the success of personal, departmental and company goals and therefore should accurately reflect the employee's overall performance as they relate to their duties and expectations set forth in their job description. Annual evaluations will coincide with fiscal year end.

## PERSONAL USE OF COMPANY EQUIPMENT

The following list for SBC is to be for business use only.

- Computers
- Fax Machine & Photocopier
- Office Supplies
- Camera, Camcorder & Accessories
- Telephone & PDA
- Company Vehicles
- Gas Card
- Credit Card
- Software programs
- Tools
- Office Space

We remind you that the above *Company Equipment* is property of SBC and all people operating Company equipment are held solely accountable for the use during office hours or otherwise.

If a situation should arise due to the improper use of such items mentioned above SBC will take the necessary action to prevent any future misuse from Individuals.

Also, we understand personal issues happen and are out of our control, however we request that personal phone calls throughout the day be kept to a minimum.

## COMPANY TOOLS

We have set in place the below steps to ensure Company tools are returned in the same condition if not better than when they were given out. The company invests in quality tools that are used on a daily basis and expect all tools to be returned in the same condition they are lent out in, like "new".

## PROGRESSIVE DISCIPLINE

Inaction can be dangerous if employee's behaviour problems are consistently ignored, it is for the direct supervisor to address poor performance, misconduct, morale and poor productivity. Steps are as follows:

1. Verbal warning –the first step in the disciplinary process, this document should include the time and date and note the incident or undesirable behaviour also recommendations made during the discussion.
2. Written warning – implemented when the verbal warning (s) did not achieve desired results or when the behaviour of a more serious nature.
3. Final written warning - is the formal discipline process, suspension can be paid or unpaid time away from work to allow the employee to think about his or her behaviour and decide how to rectify the situation rather than face

termination. This step serves as a final written notice that such behaviour cannot and will not be tolerated. Further deterioration of performance or incidence of undesirable behaviour will lead to the termination of employment.

If the violation warrants immediate termination, the acting manager with approval from the President, has the ability to terminate employees on the spot.

Any violation to the policies found herein this document are subject to discipline.

## VOLUNTARY TERMINATION

Employees are requested to give at least two weeks written notice or as outlined in their offer letter of employment when resigning from the company in order to provide enough time to suitably cover the job vacancy. A letter of resignation should be submitted to the President including the exact date of resignation, the reason for leaving and a forwarding address. All SBC property such as keys, identification cards, customer lists, pricing material and office equipment must be returned to Management before leaving. Vacation taken or paid but not earned at termination date must be repaid to the Company. The Company will make every effort to have your final cheque issued and the necessary documents ready for you within the timeline outlined in the Employment Standards Act.

## HIRING AND TERMINATION REQUESTS

The Company requires that all requests for new or additional employees be directed in writing to the President for approval.

All hiring requests via an employment agency as well as placing advertisements in the media require prior written approval by the President.

All "Employment Offer Letters" are issued by the Company require the signature of the President and Director of Finance.

All "Letters of Termination" require the approval and signature of the President.

## SALARY ADMINISTRATION

### HIRING AND EMPLOYMENT POLICIES

The first 3 months, or longer mutually agreed period, of your employment is considered probationary. This period will allow you to learn the requirements of the job and will allow Management to assess your capabilities. Absence during the probationary period will automatically extend by the length missed, during which time employees are ineligible for benefits (if available).

### PAYROLL

To be completed once hired:

- TD1 – Federal & Provincial
- Employee hiring information form
- Acknowledgment form
- Benefits enrollment form (if available)
- Life Insurance & Long Term Disability Form (if available)
- Supply a blank void cheque with employee's name on it for direct deposit.

Salary and hourly employees are paid on a biweekly pay period.

## VACATION

It is our intention to provide a period of rest and relaxation and we understand vacation is important for the mental well-being of our Employees. Therefore, vacation entitlement applies to salary and hourly employees, for the period of ten working days, or as outlined in employee offer letter, per year or 4% of your salary.

Vacation requests must be made to your supervisor; the proper form which can be found in the Company shared files. These requests should be given to your supervisor for approval.

Vacation in excess of 10 days has a big impact on company operations and should be avoided. Special circumstances will be scheduled at the mutual convenience of the employee and his/her supervisor. Absence without notification or approval will be deemed a vacation day or leave of absence without pay.

Conflict of vacations through staffing requirements can hopefully be resolved by employees, however, final determination will be:

- Company discretion
- Seniority & position within the Company

## VACATION YEAR

For the purpose of scheduling vacations, the vacation year will be from January to December. Vacation may be granted at such times during this period as determined by management with due consideration being given to efficient operation of company business and personal desires of Employees.

Employees will become eligible for increased vacation benefits on the anniversary date of their employment and may schedule to take their increased vacation at any time during the calendar year. Vacation time increase is prorated from the anniversary date for the remainder of the year. Vacation taken but not earned must be repaid to the company on voluntary termination.

## VACATION ENTITLEMENT SCHEDULE

Years of Service Vacation Entitlement:

All employees will start with a minimum of 10 days of vacation time, not to be taken consecutively. Increasing vacation time is at the discretion of the President based on performance evaluations.

## CARRY FORWARD OR PAYMENT IN LIEU OF VACATION

Vacation should not be carried forward beyond the calendar year in which they were earned. Payment in lieu of vacation is contrary to company policy. Any vacation time carried forward must be taken before February 28<sup>th</sup> of the following year.

## STATUTORY HOLIDAYS DURING VACATION

If a statutory holiday should fall within an employee's scheduled vacation the statutory day(s) will not be counted as a vacation day. If the employee chooses to take an additional vacation day to extend their time off such time off will ordinarily be taken at the beginning or the end of the vacation period.

## PROVINCIAL STATUATE

To the extent that the provisions of this policy do not meet the minimum requirements of any applicable Provincial Statute, the provisions of the Statute shall govern.

## NON-STATUTORY RELIGIOUS HOLIDAYS

Employees requesting time off work to observe a non-statutory religious holiday should use their vacation entitlement, or request an unpaid leave of absence.

## LEAVES

### BREAVEMENT

The company will pay three (3) days bereavement to an employee who suffers the loss of an immediate family member.

Immediate family member includes:

- Spouse
- Son/daughter (natural/adopted)
- Parent
- Sibling
- Grandparent
- In-laws

If additional days are required, they may be taken as vacation days if available or without pay, subject to approval of the company. The manager may provide time off to attend funerals of non-immediate family members.

### LEAVE OF ABSENCE

The company recognizes that there are occasions for compelling personal reasons you must be away from work for extended periods of time.

Leave of absence in the first three (3) months during your probationary period is at the discretion of your supervisor. However, any leave of absence in the first three (3) months of service will be deducted from your starting date with the company in the calculation of benefits and entitlements.

If you have been employed with the company longer than three months you should notify the President in writing of your request for leave. In this letter you should state your planned last day of work, duration, and approximate date of return, along with your reason for requesting the time off. You must have used up all of your available vacation days prior to the written request. Each situation will be evaluated on an individual basis to determine if the need for the leave is a justified absence from work. Furthermore, the employee's record of performance, attendance and the effect that the absence will have on the work area will all be considered prior to authorization.

### PREGNANCY OR PARENTAL LEAVE

Employees must provide the company a minimum of two weeks written notice before beginning a pregnancy or parental leave. The notice letter shall include the starting date for the pregnancy or parental leave and expected return to work date. If the employee wants to change the date he or she will return to work, SBC must receive another written notice at least four weeks before the change will happen.

## EXPENSES

### PROMOTIONAL ENTERTAINMENT POLICY

*RE: ENTERTAINMENT FOR THE PROMOTION OF SBC*

SBC understands the need and benefit of entertaining existing and prospective business clients. Promotion is designed to enhance our company contacts and increase company profits. Abuse of promotion will not be tolerated.

You may not misappropriate funds or property, nor may you knowingly assist another to do so. Similarly, you may not convert any assets, which are not yours for your own use or benefit, or for the use or benefit of anyone other than the rightful owners of such assets, nor may you knowingly assist another to do so.

## REIMBURSEMENT OF COMPANY EXPENSES

To be reimbursed for out of pocket company expenses, attach original receipts to the expense form with a full description of the entertained individual, company or expense. Your direct supervisor must approve all expenses before submitting to the Accounts Payable Department. Payments are made on the 15<sup>th</sup> and 30<sup>th</sup> of each month provided forms are handed in at least 5 days prior (i.e. the 10<sup>th</sup> and the 25<sup>th</sup> of each month.)

We do not reimburse for highway usage charges, such as the 407, getting to and from work on time each day is solely the employee's responsibility.

## IMPROPER PAYMENTS, GIFT & ENTERTAINMENT

You may not use your employment status to seek personal gain from those doing business or seeking to do business with the Company nor accept such improper gain offered. You may not engage in any act that could be interpreted as seeking, receiving or providing a bribe, kickback or questionable payment directly or indirectly.

You may not seek or accept any of the following *Gifts* which are not limited to:

- Gifts; payments; services; fees; special valuable privileges; pleasure or vacation trips or accommodations;
- Loans from any person, organization or group which does business or seeks to do business with the Company or any of its affiliates

While on Company business you may not seek advantage by providing improper payments, gifts or excessive entertainment or benefit to any persons. While acting on behalf of the Company you must do so with honesty, good faith and fairness. This is particularly important if you are in a position of trying to persuade others either to do business with us or to act in a way advantageous to the Company. Bribes, kickbacks, extraordinary commissions or other devices for the purchase of favoured treatment by governments, other business organizations or individuals are strictly prohibited.

You may supply or accept modest gifts, favours, services, travel and entertainment provided that all of the following conditions are met:

- They are not in cash, bonds or negotiable securities and are of a limited value unlikely to be interpreted as a bribe, payoff or other improper payment.
- They are made as a matter of general and accepted business practice.
- They are not illegal and are in accordance with generally accepted ethical standards

As a rule, a gift with an estimated value over CDN \$100.00 is not acceptable, unless approved by the President. The choice of suppliers for goods or services must be decided on the basis of quality, price, service and benefit to the organization.

Reasonable expenses for business entertainment (e.g. customers, public officials, etc.) are allowed provided:

- Proper accounts are kept, and
- The event is in no way out of the ordinary and cannot be seen as an attempt to subvert the other person's integrity and proper judgment.

## GENERAL OFFICE PROCEDURES

All visitors entering the office must sign in. Salespeople visiting our offices are not allowed to wander. They should be met and returned to the common area.

All printing such as business cards, production records, sales invoices, etc. are maintained and remained in private from the public. Keeping your workspace clean from debris and clutter will reduce the risk of unwanted information being known by the general public.

## VEHICLE POLICIES

### FUEL PROCEDURE

The following procedure and information must be adhered to when using a company issued gas credit card.

1. Enter the individual secret PIN number
2. Enter the current mileage of the vehicle at time of purchase

NOTE: Company provided gas/credit cards are for fuel and designated vehicle on card only. To ensure proper maintenance of the vehicle if you require any further services such as oil, windshield washer fluid, car wash etc. we ask you hold on to receipts and obtain your managers approval, submit expense form to Accounts Payable.

### COMPANY VEHICLES

Company vehicles may not be used for personal purposes except by designated employees. This policy is dictated by:

- Insurance regulations, which insure our vehicles for business use only.
- Income tax payment for the personal use of a vehicle by the operator.
- Due to licensing and insurance requirements our regular truck drivers may not drive the company's larger trucks unless approved by the President.

On an occasional basis, should you require the personal use of any company vehicle permission must be obtained from the President.

New employees of SBC who are required for the purpose of their job to operate any vehicle must obtain an abstract from the Ministry of Transportation and shall present the driving record to the President and Safety Representative before being issued access to a vehicle.

Parking tickets can be avoided so we ask you do your best to park legally. Should you receive a parking ticket during working hours please pay immediately and you will be reimbursed as soon as possible, upon your manager's approval. Under no circumstances will SBC pay the cost of any traffic violations caused by unsafe driving habits. Be aware that our insurers regularly check the driving records of employees who operate company vehicles. Abstract audits from SBC will be conducted periodically over the year and at any time the President may request a report.

If rules of the road are not adhered to or if the report indicates you are not in good standing with Ministry of Transportation, you will not be allowed to operate company vehicles which may result in SBC removing access to the vehicle from the employee's possession.

### SERVICING OF COMPANY VEHICLES

Drivers of company vehicles must service their vehicles in the following manner on a regular basis:

Once every 90 days or 5,000 kilometers (whichever occurs first) the vehicle is to be taken to an Auto Lube Centre to have Lube, Oil, Filter and inspection of all levels, lights, etc. performed. The entire service takes approximately 15 minutes and can be performed on weekends, evenings or during lunch. Submit your invoice for reimbursement. Once a year or every 20,000 kilometers (whichever occurs first) vehicles are to be taken to dealers or major service garages for a complete inspection and company authorized work as required. This service is to be pre-approved by the President who will issue an appropriate purchase order and provide you with a temporary service.

For emergency service, when possible contact the Safety Manager/President. In all cases, ensure the safe removal and storage of the vehicle. If a small part results in a non-operative vehicle, have it repaired at the closest location and submit your invoice for reimbursement. All major work including breakdowns, bodywork, new tires and the like are to be pre-arranged through the office.

Each time fuel is purchased for the vehicle please check the engine oil. The engine oil light indicates pressure loss not a low oil level. Low oil levels can cause extensive repair costs, which are considered negligence and are not covered by warranty. Further, check windshield washer and other fluid levels regularly. A walk around inspection of your vehicle should be done daily.

## ACCIDENT PROCEDURES

All operators of company vehicles must ensure that they receive an accident report booklet from the Safety Manager. This booklet along with a pen or pencil is to be kept in the vehicle at all times. Take a few minutes and familiarize yourself with the contents of this booklet.

Should the need arise to use this booklet, please complete it in full and hand it in to the Safety Manager. After the booklet has been used please ensure a new booklet is placed in your vehicle. All vehicle accidents regardless of dollar value must be reported to the President.

## MISCELLANEOUS PROCEDURES

Under no circumstances are hitchhikers allowed in any SBC vehicle.

No passengers are allowed in any of our vehicles unless they have a proper seat and safety belt.

Safety belts are mandatory and must be worn at all times by all occupants of our vehicles.

Excessive idling is not permitted, please remember that company vehicles must be properly maintained and kept clean and tidy at all times.

## LOCKING & SECURING THE VEHICLE

Our vehicles contain valuable equipment; it is imperative that all doors to the vehicle are locked when leaving it unattended and is the employee's responsibility to report all vehicle problems i.e. locking mechanism to their Supervisor.

## PERSONAL VEHICLES USED FOR COMPANY BUSINESS

If you are required to use your personal vehicle for company business, you will be reimbursed at the rate set by industry standards and Revenue Canada.

**NOTE:** Proper Business Insurance Coverage for your vehicle is the responsibility of the employee.

## SAFETY AND SECURITY

### SAFETY

Employees at every level, including management are responsible and accountable for all reasonable and necessary precautions to protect their own health and safety and that of coworkers or other persons affected by their work. SBC is committed to providing you with a working environment that will not endanger your health or personal safety in any way and will take the steps necessary to provide and maintain the environment.

It is our responsibility that every effort be made to prevent accidents. Protective equipment is supplied to those on site or visiting site locations and we provide training in the use of equipment. It is also your responsibility to make proper use of personal protective equipment, to work in a safe, professional manner and to follow all safety instructions at all times. When in the Brewery, safety boots and safety glasses must be worn during days when brewing or using hazardous chemicals. Safety orientation is conducted by our Safety team for all SBC employees. In addition to this, we give job specific orientation to those entering the Brewery. Job specific orientation happens for each task in the Brewery. No one is exempt from the practice of good safety procedures.

*We are proud of our good Safety record*

### ACCIDENT REPORTING IN ORDER:

- All accidents must be reported to our Health & Safety Manager and the President, even those that do not appear serious.

- The appropriate **Workers Safety & Insurance Board Forms** must be completed at the time of an accident and witnessed.
- SBC has a Return to Work Policy (Please refer to the Safety Manual)
- If you are off work due to an accident, check in regularly by phone to keep our Health & Safety Officer aware of your progress.

The safety of our employees, the public, the protection of company equipment and the satisfaction of the customer are our objectives. We need your help to prevent accidents. It is our responsibility to provide safe and efficient equipment to accomplish this goal. It is also our responsibility to thoroughly investigate each accident and take such action as we see fit in order to prevent similar occurrences.

It is your responsibility to use equipment solely for the purpose intended, care for it and report any faults with it. It is your responsibility to work safely at all times.

The responsibility is yours to adhere to our Standard Safety Policy and any Government Safety Legislation and to notify us of any safety issues or concerns. Should issues or concerns arise, we ask you to contact our Safety Department.

## PANDEMIC PLAN

### GENERAL

Pandemic planning is a strategy and plan that is developed to deal with the issues resulting from a major/infectious health issue.

The following documentation will outline our plan on moving ahead demonstrating our established commitment to provide not only a safe and healthy working environment for our staff but our ability to continue to effectively service our clients.

- Assemble a team
- Identify hazards and assess risks
- Set priorities
- Plan to protect people and processes
- Build the foundation

By working to the plan as outlined, we firmly believe we will be able to maintain a safe environment for our staff and quality service standards for our clients.

SBC has the ability to control all areas of concern within this Pandemic Plan however we are aware that we must adhere to the directions and guidelines as outlined by the Authorities having jurisdiction.

### CRITICAL RESOURCES AND MATERIALS (CRM)

All managers will identify critical job functions in their department and develop an inventory of skills required to do that function. Managers will identify individuals with the necessary or similar skills to perform the critical job functions. Managers will ensure that there are trained employees to perform critical job tasks if any individual is unable to do so for any reason.

Certain tasks may be identified as tasks that are required to be done offsite.

By working in accordance to the Pandemic Plan as outlined, we firmly believe that we will be able to maintain a safe environment for our staff and provide quality service standards for our clients. We will and do have the ability to control all areas of concern within this Pandemic Plan however, we must be aware and adhere to the directions and guideline as outlined by authorities having jurisdiction.

## COMMUNICATIONS

One of the key factors in maintaining a solid business is communications. Listening, observing, absorbing and the dispersal of information will be critical during a Pandemic Event.

SBC will maintain constant monitoring of Governmental and Ministry of Health Communications via radio, television, printed media and internet services. Information gathered will be conveyed to staff unilaterally to ensure that the most accurate and valid information is properly dispersed.

## PRIVACY POLICY

SBC has adopted this Personal Information Protection Policy in compliance with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and/or the provincial privacy law Personal Information Protection Act (PIPA) (if applicable).

The protection of your personal information is important to us. We as a company are committed to protecting the privacy of its employees. This policy sets out how we collect, use and disclose the personal information of our employees, including applicants applying for a job. Our commitment is to maintain the confidentiality of your personal information and to preserve your right to privacy.

In our day to day business activities there may be times when we have to collect personal information for employee files which may include SIN's, DOB's, home addresses, phone numbers, driver's license numbers, personal information regarding family members for dependent information on benefits etc. While it is necessary for the Payroll Manager to review and make the appropriate changes, it is the office's role to hand over employee files. From time to time we also collect information corporately for the purpose of credit references on our suppliers and customers.

SBC will take reasonable steps to protect the personal information it holds from misuse, loss and from unauthorized access, modification or disclosure.

Employees are obligated to ensure that personal information, to which they may have access remains confidential, is only used for the purpose for which it was collected, is not disclosed without authorization or used for personal gain.

Employees are required to follow all procedures regarding the collection, use and disclosure of personal information as set out in this policy.

The individual accountable for employee's personnel files of SBC information protection compliance is: Kyle Getty, President.

All SBC employees who at one time or another receive personal, privileged and/or confidential information which may concern other employees, company operations or clients/customers; and who collect, maintain and/or use personal information of employees, are responsible for ensuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures.

In certain circumstances personal information may be collected, used, or disclosed without the knowledge and consent of the individual. Exemptions include, but are not limited to, personal information gathered for:

- Legal, medical, or security reasons,
- Detection and prevention of fraud or for law enforcement,
- Journalistic, artistic or literary purposes if its use is confined to those purposes.
- Job prequalification requirements

This policy applies to personal information relating to employees and/or applicants who apply for a job at the company.

This policy applies to all employees or anyone else granted access to personal, privileged and or confidential employee and or client information.

"Personal information" is defined as factual or subjective information, recorded or not, about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. [However, in recent decision of the Privacy Commissioner of Canada, a business email address was considered personal information protected under the federal privacy legislation]

The following definitions apply in this policy:

**“Personal Information”** means recorded information about an identifiable individual which includes, but is not limited to home addresses and telephone numbers, age, sex, marital or family status, identifying numbers such as social insurance number and/or driver’s license, race, national or ethnic origin, colour, religious or political beliefs or associations, educational history, medical history, disabilities, blood type, employment history, criminal history, anyone else’s opinions about an individual, an individual’s personal views or opinions, and name, address and phone number or parent, guardian, spouse or next of kin.

**“Collection”** means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

**“Consent”** means a voluntary agreement with what is being done or proposed. Consent can either be expressed, or implied. Express consent is given explicitly, either orally, or in writing. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where consent may reasonably be inferred from the action, or inaction of the individual.

**“Disclosure”** means making personal information available to others inside and/or outside the organization.

**“Use”** means the treatment and handling of personal information by, and within the company.

**“Educational history”** means courses, grades, grade point average, academic status, graduation status, other institutions attended, admission status, course schedule and course registration status.

**“Financial history”** means information about income, employee’s finances, assets, salaries, wages, monetary incentives, beneficiaries, insurance, benefits, financial transactions, credit worthiness, and debts.

**“Employment history”** means personal recommendations or evaluations, character references or personnel evaluations, letters of discipline and reprimand and reasons for termination.

**“Medical history”** means health care history relating to medical, psychiatric, or psychological diagnosis, condition, treatment, or evaluation.

**Personal health information”** means information about an identifiable individual that relates to the physical or mental health of the individual, the provision of health care to the individual, the individual’s entitlement to payment for health care, the individual’s health care number, the identity of providers of health care to the individual or the identity of substitute decision-makers on behalf of the individual.

**“Law enforcement”** means disciplinary investigations or proceedings that lead or could lead to a penalty or sanction being imposed and policing.

**“Third Party”** means individuals or organizations other than the subject of the records or representatives of SBC. Note that in certain circumstances, the company may be entitled to provide information to an external party acting as an agent of SBC.

Employees are responsible for:

- Keeping their own employee files current regarding their personal information;
- Being familiar with and following policies and procedures regarding personal, privileged and/or confidential information;
- Obtaining the proper consents and authorizations prior to disclosure of personal, privileged and/or confidential information;
- Immediately reporting any breaches of confidentiality to the person responsible for privacy compliance, which is the President;
- Keeping private passwords and access to personal information privileged and confidential;
- Explaining this policy to clients and referring them to the company’s Privacy Officer if necessary;
- Relinquishing any personal, privileged and/or confidential information in their possession before, or immediately upon, termination of employment.

Supervisors, human resources and/or payroll personnel are responsible for:

- Obtaining consent for the collection and use of personal information from employees and ensuring that appropriate consents have been obtained from employees with respect to the collection and use of personal information;
- Ensuring policies and procedures regarding collection, use and disclosure of personal information are consistently adhered to;
- Monitoring systems and procedures to ensure employee records are kept private;

- Responding to requests for disclosure after the proper release is obtained;
- Obtaining proper consents and authorizations prior to disclosure of information contained in employee records;
- Responding to employees' requests for access to their files;
- Ensuring proper disposal of unnecessary files/information;
- Cooperating with the President to investigate complaints or breaches of policy;
- Obtaining from employees prior to their termination any personal, privileged, confidential information in their possession;
- Ensuring that disclosure of personal information or personal health information to a third party is done with the approval of the President in order to minimize risk of non-compliance with applicable legislative or regulatory regimes;
- Maintaining separate files to ensure that personal health or other sensitive data is protected.

The financial department is responsible for:

- Cooperating with supervisors, human resources and/or payroll personnel in developing internal policies for the collection, use and disclosure of personal information, personal health information and other confidential data of employees and clients;
- Monitoring and responding to Third Party requests for personal information or other personal/confidential information;
- Ensuring appropriate consents are obtained for the collection, use and disclosure of personal and other confidential information;
- Where collection, use or disclosure is permitted without prior consent, notifying individuals of the collection, use and disclosure of personal information and/or other personal confidential information after such occurrence.

## LEGAL REQUIREMENTS

### **Accountability**

SBC is responsible for personal information under its control and shall designate the President to be accountable for compliance with the PIPPEA and all privacy requirements.

### **Identifying Purposes**

The purpose for which personal information is collected shall be identified by SBC at or before the time the information is collected.

### **Consent**

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information.

### **Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified by SBC.

### **Limiting Use, Disclosure and Retention**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### **Accuracy**

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### **Safeguard**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### **Openness**

SBC shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

### **Individual Access**

Upon request, an individual shall be informed of the existence, use, disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

### **Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual accountable for SBC's compliance.

## PROCEDURES

This Personal Information Protection Policy addresses two broad issues:

- The way in which the Company collects, uses, discloses and protects personal information as well as privileged and confidential information;
- The right of employees or third party to have access to personal information, and if necessary, to correct the information.

## Collecting, Using and Disclosing Information

### Information Collected

SBC collects, uses and discloses employee personal information in order to establish, manage or terminate an employment relationship. Personal, privileged and/or confidential information about customers/clients may only be collected, used, disclosed and retained for the purpose identified by SBC as necessary.

### Providing Consent

When you first become an employee of the company, your personal information is obtained and used only with your consent. The consent you provide at this time allows us to administer all aspects of your employment relationship with the company.

In order to provide you with benefits with the group benefit plan, it may be necessary for you to provide us with additional personal information at a future time. We will require you to provide expressed consent at that time. Your consent can be either expressed or implied. Where practical, we will obtain your expressed consent. For example, when you sign an application form you are giving us expressed consent to use your personal information to conduct a reference check for a job. We will continue to use and disclose your personal information previously collected in accordance with our current privacy policy, unless you inform us otherwise. We will infer that consent has been obtained for the continued use or disclosure of your personal information by the continuation of your employment with the company.

### Withdrawal of Consent

You may withdraw your consent subject to legal or contractual obligations and on reasonable notice.

If you want to withdraw your consent, you should first contact the President to understand the implications of such withdrawal, and then if you choose to proceed, to give the requisite notice.

### Protecting Your Privacy

Your personal information is kept in strict confidence. We protect your personal information from error, loss and unauthorized access. The range of security measures to consider covers physical security, computer and network security, communications security and personnel security.

### Physical Security

SBC's information may be stored in a range of paper based and electronic forms. Physical security measures prevent unauthorized access to information and are relevant to all forms of storage.

Physical measures could include:

- Barriers such as locks;
- Security keys and containers such as filing cabinets and safes;
- Security alarm systems to detect unauthorized access and
- Access control measures.

These may be complemented by procedural measures such as:

- Recording file movements, especially if files are sent to different offices;
- Encouraging a clean desk policy;
- Storing all files in a secure place after use and
- A security classification system to identify information needing special protection

## Computer and Network Security

Information technology systems have the potential to increase the risk of unauthorized disclosure of personal information. SBC assesses their security risks and takes appropriate measures to protect the integrity of their information systems and networks. Risk assessments cover information systems for storing, processing and transmitting information. The appropriate protective measures will depend on the circumstances and risks involved.

Depending on the SBC's risk profile, measures could include:

- Access control for authorized users, such as user passwords, screen saver passwords and limiting access to shared network drives to authorized staff;
- Virus checking;
- IT support to deal with security risks; and auditing procedures and data integrity checks.

Data security tools representing good practice include audit trails and digital signatures that authenticate authorship and guarantee detection of unauthorized modification.

## Communications Security

As many computing systems make use of telecommunications networks, security of computing and communications are increasingly interrelated. There are two kinds of communication risks to consider: interception of transmissions and unauthorized intrusion into networks.

Transmission of information may involve insecure telecommunications lines that may be vulnerable to interception.

Where appropriate, protection of personal information could include:

- checking facsimile numbers before sending personal information, and confirming receipt;
- PIN numbers and passwords for some telephone transmissions, for example, telephone banking services;
- checking identity before giving out personal information over the telephone; and
- encryption of data for high risk transmissions.
- Good practice computer and network security would include both systems, such as firewalls, routers, network intrusion detection systems, host intrusion detection systems, appropriate encryption and expert monitoring.

Unauthorized intrusion into computer networks not only jeopardizes the confidentiality of information, it also threatens network integrity by corrupting data. Connections to public networks are often useful and convenient but they can create a route for 'hackers' to intrude into an organization's information system.

What are considered 'reasonable steps' will depend on the particular circumstances of the organization and the information it holds.

## Personnel Security

Personnel security refers to limiting access to personal information to authorized staff only. Organizations could also ensure that those who do have access respect the organization's culture of privacy. In general, personal information should only be accessed by those people who 'need-to-know', that is, they need it to carry out their duties.

- Training staff and management in security awareness, practices and procedures.
- Developing policies on who can access and use particular categories of information.

Specifying and reviewing access privileges for shared computer drives containing personal information.

## Access to Personal Information

Our employees who have access to your personal information are made aware of how to keep it confidential. Employee access to confidential personal information about applicants, employees or former employees, including others paid through the company's payroll system where the company has custody or control of the information will be allowed if the information is necessary for the performance of the duties of the employee. All employees of SBC are bound by this policy and a Confidentiality Policy.

An employee's immediate supervisor, higher level managers, human resources and payroll personnel shall have access to employee records containing personal information. An employee's supervisor, higher level managers, human resources and payroll personnel will have access to an employee's personal health information if the Financial department determines that such access is permissible and necessary.

Employees may request access to review their own file by making arrangements with the President. Employees shall provide at least twenty-four (24) hours written notice to the President. We will respond to your request with 5 days or advise you if additional time is required to respond to your request.

Employees may obtain a copy of any document in their file which they have previously signed. No material contained in an employee file may be removed. A representative of the company will be present during viewing of the file.

There may be situations in which we are legally prohibited from allowing you access to your personal information. For example, we would be so prohibited if allowing you access to your personal information would likely reveal personal information about another person or other confidential information. If this is the case, we will advise you why, subject to any legal restrictions. Other exceptions are as follows:

- Evaluating information collected in a reference check if the disclosure reveals the identity of the information source, and the source expected that his or her identity would be held in confidence (this information is retained in another file rather than in the employee file); and information that would disclose personal information about another party.
- The right of access does not extend to information exempted for disclosure under PIPEDA and/or PIPA, but if that information can reasonably be severed from a record an applicant has the right of access to the remainder of the record.

## Correcting Personal Information

You have a right to submit a written request to access your personal information that is in our possession and make corrections to it. An employee can request correction of his or her personal information if there is an error or omission or alternatively, he or she may require that a statement of disagreement is attached. We will amend personal information that is demonstrated to be inaccurate or incomplete. An employee may provide written notice of correction related to any data contained in the employee's file. The notice of correction shall be provided to the President. Client information is only to be accessed by employees with appropriate authorization.

## Disclosure

The company will not disclose personal information about applicants or employees to any third party, unless it is otherwise provided for by employee explicit consent or by law.

Employees must ensure that no personal, privileged and/or confidential information of clients is disclosed without the client's consent and then only if security procedures are satisfied.

### Access to Third Party Personal Information by Employees or About Employees

We do not make any employee personal information available to other organizations without your express consent, except under the following circumstances:

- If the employee has given consent
- If the information is required for the purpose for which it was obtained
- If required by law such as reporting an employee accident to the Workers' Compensation Board of a province or to a law enforcement agency
- In compelling circumstances under which a delay in obtaining information may be injurious to an individual's health and safety; and
- In compassionate circumstances in order to facilitate contact with next-of-kin or a friend of an individual who is injured, ill or deceased

### Employee Requests for Disclosure of Their Own Personal Information to Third Parties

Employee requests for disclosure of their own personal information to third parties must be accompanied by a completed signed and dated Authorization to Release Information form. This form should be used in dealing with insurance companies with respect to employee benefits and to provide confirmation of earnings to financial institutions for lending purposes.

If an organization contacts the company for reference information on an employee or former employee of the company, the information is only disclosed if the organization has the written authorization of the employee. Requests regarding third party access to employee personal information will be handled by the Payroll Manager (must be in writing and approved by the President). Access will be administered according to those specific policies and procedures, which may be established from time to time by the Company to apply to the personal information of employees.

### Information Protection Measures

- We have developed and continue to enhance security procedures to safeguard and protect personal information against loss, theft, unauthorized disclosure, copying, and unauthorized use or modification.
- We maintain appropriate safeguards and security procedures that reflect the types of documents, including electronic or paper records. Organizational measures taken include security clearances and limited access on a "need-to-know" basis. Technological measures include the use of passwords and encryption.

### Retention/Destruction of Personal Information

We keep your personal information only so long as we need it to administer the employment relationship and services, and for a reasonable time thereafter, or to meet any legal, regulatory, or tax requirements.

Unless retention of personal information is specified by law for certain time periods, personal information that no longer requires fulfilling the identified purposes shall be destroyed, erased or made anonymous.

Notwithstanding the above, personal information that is the subject of a request by an individual or a Privacy Commissioner shall be retained as long as necessary to allow individuals to exhaust any recourse they may have under federal and/or privacy legislation.

To protect individual's privacy rights destruction needs to occur by secure means. Garbage disposal of intact documents leaves personal information extremely vulnerable to unauthorized access and misuse. This method of disposal should generally be avoided. Electronic records that are no longer needed should be deleted. However, it is very difficult to reliably remove all traces of electronically stored information. Organizations will need to be aware that deletion may only remove the file-reference but leave all the other information intact.

Secure disposal of paper-based records could include:

- Shredding, pulping or disintegration of paper files; or
- Contracting an authorized disposal company for secure disposal.

Secure disposal of electronic records could include:

- Overwriting records before they are deleted; or for very sensitive information at high risk, degaussing might be considered (demagnetization of the medium using alternating electric currents).
- Good practice could also include the deletion of back-up files.

## DE-IDENTIFICATION

Permanently de-identifying information means removing from the record any information by which an individual may be identified. Simply removing the name and address may not be sufficient to de-identify the information. Permanent de-identification also means that an organization is not able to match the de-identified information with other records to re-establish the identity of individuals.

The test for whether information is identifiable is whether the identity of the individual is apparent, or may reasonably be ascertained, from the information using the definition of 'personal information' in section 6 of the Privacy Act.

A de-identification procedure would not be complete if, from the resulting information, the identity of an individual could be reasonably ascertained. Reasonable steps to de-identify information may include:

- Considering the capacity of the organization to re-identify the information
- Careful consideration of the identifying nature of every aspect of the information and setting up safeguards that ensure that future collection or uses will not re-identify the information. An organization may need to include in contractual arrangements with a receiving organization that the receiving organization will not re-identify the information.

## FURTHER INFORMATION AND CONTACT

You can obtain further information about our Personal Information Protection Policy by contacting the President. If you have a question or complaint regarding our privacy policies or procedures, you may contact the individual accountable for our personal information protection compliance the President.

If you make an inquiry or lodge a complaint and are not satisfied with the outcome of that, you may challenge that outcome by writing a letter to our President, requesting reconsideration of your matter. The company's commitment is to promptly open a dialogue with you.

If your concern remains unresolved to your satisfaction, you may address your concerns to the Privacy Commissioner of Canada, 112 Kent Street, Ottawa, Ontario K1A 1H3 or the Privacy Commissioner of Ontario.

## WHISTLEBLOWING

No employee shall be disadvantaged or denied any benefit of employment by reason that SBC believes that an employee will do anything referred to paragraphs below or by reason that an employee, acting in good faith and on the basis of reasonable belief:

- Has disclosed to the Privacy Commissioner that SBC or any other person has contravened or intends to contravene a provision of any privacy legislation related to the protection of personal information
- Has refused or stated the intention of refusing to do anything that is in contravention of a provision of any privacy legislation related to the protection of personal information.
- Has done or stated an intention of doing anything that is required to be done in order that a provision of any privacy legislation related to the protection of personal information not be contravened.

## E-MAIL AND INTERNET USE

SBC's e-mail and Internet resources are business systems for use by authorized employees to conduct legitimate company business only. See attachment 'A' at the end of this document for further clarity on what is acceptable and prohibited. Use of an Internet/e-mail connection for any purpose that is not specifically related to company business is prohibited. Some incidental and occasional personal use of these systems is permitted outside of working hours subject to the sections below.

Due to problems with computer viruses, no original disks are allowed to leave the office. If required a copy can be made for your use by utilizing "Cloud" based file sharing systems, at the approval of the Director of Finance or the President. Further, no software is allowed to be loaded onto the system without the authorization of the President.

Although SBC respects the privacy of its employees, employee privacy does not extend to the employee's use of Silversmith's e-mail and Internet systems. No person using such resources should expect privacy in their communications. All e-mail communications and information downloaded from the Internet constitute company property.

SBC seeks to promote a high level of responsible behaviour in connection with the use of Internet and e-mail and has formulated this policy to accomplish the following goals:

- To protect the reputation and resources of SBC its customers and the Internet/e-mail communities at large, from irresponsible or illegal activities
- To ensure privacy, security and reliability of SBC network and systems as well as the systems of SBC clients
- To establish guidelines for the acceptable use of our network
- To define generally those actions which are considered abusive and prohibited
- To outline procedures for handling and reporting abuse to SBC

All users of SBC network and electronic resources must comply with this policy, as well as applicable laws and regulations. Users of SBC Internet and e-mail systems are strictly prohibited from creating, transmitting, distributing, forwarding, downloading and/or storing anything which:

- Infringes any copyright, trademark, trade secret, or other intellectual property right
- Is obscene, immoral, unethical or pornographic
- Is libelous, defamatory, hateful, or constitutes a threat or abuse
- Encourages conduct that would constitute a criminal offense or give rise to liability
- Is considered e-mail junk, spam or chain e-mail
- Forges or misleads the sender's identity
- Divulges private and/or confidential information related to SBC business, its clients and/or its employees
- Violates any of SBC policies including policies related to Conduct and Behaviour or Workplace Harassment

Users of our Internet and e-mail systems must protect themselves and SBC from entering into unintended legal obligations and contracts. This includes downloading from the Internet unauthorized programs and/or software.

Internet and e-mail systems users are required to take appropriate steps to ensure the security of the system by adhering to all SBC security measures, including using and safeguarding all necessary passwords. Users are required to use only the browser software installed by SBC. No connection to the Internet is permitted except via established company procedures.

The Director of Operations is responsible for authorizing the use of e-mail and Internet resources, providing appropriate training to users, issuing and recording system passwords and monitoring the use of electronics systems as necessary or as requested. This includes auditing and logging Internet use for compliance with this policy. Additionally, the Director of Operations is responsible for investigating and reporting on any allegations or concerns regarding the misuse of these systems.

Internet and e-mail use may be monitored from time to time, without notice, to evaluate customer service and to determine how the system is being used. Employees should not expect privacy when using e-mail or Internet

resources. All monitoring of electronic systems shall be conducted by the Director of Operations or the President who will log and audit Internet usage to ensure compliance with this policy.

When necessary, due to vacations and other absences, SBC may request access to an employee's e-mail and Internet accounts in order to properly continue work. Employees are required to provide this access upon request.

Downloading of any programs, software or data from the Internet or e-mail directly to a user's computer terminal is prohibited unless advance written authorization is obtained from the Director of Operations. Such material must first be screened through SBC's computer security systems including virus scans.

Upon the termination of any e-mail or Internet user, the user's immediate supervisor shall immediately notify the Director of Operations of the name(s) of the user(s) terminated. The Director of Operations is required to immediately deactivate the users' password(s) and the users' access to any electronic systems.

In the event any individual feels the electronic systems of the SBC are being misused or used in an abusive manner, that individual shall report the alleged abuse directly to their Manager, in confidence. The Manager shall within forty-eight (48) hours, investigate such allegations which may include monitoring electronic system usage. If usage is deemed unusual and it is believed that monitoring Internet sites visited and/or reviewing e-mail message contents will help the investigation, the Manager shall obtain the written approval of the President before commencing such monitoring.

Upon completion of the investigation, the investigating manager shall issue a report and recommendation(s), if any, to the President for further action.

The complainant shall be advised by the Director of Operations of the outcome of the investigation. Employees found in breach of this policy will be subject to disciplinary action up to and including discharge for cause.

## Social Media

SBC understand the importance of social medial platforms such as Twitter, Instagram and Facebook to use as promotional tools. The use of these platforms are to be controlled and regulated as they reach a large population and directly reflect the company as a whole. SBC seeks to promote a high level of responsible behaviour in utilization with these internet based programs and formulated this policy to accomplish the following goals:

- Promotion of events and musical talent
- Sales and special offerings
- Support staff and partnering companies with 'likeable' posts
- Changes to operating hours or other daily functions of the business
- Share general information on the Company with the intent to increase sales

Social media platforms will not be used for the following:

- Personal opinions
- Political comments
- Degrading or negative comments to anyone inside or outside SBC.
- Any comments that would directly break any policies captured herein this document

The image of Silversmith is projected to our followers and how we manage that message will directly impact sales. To achieve a streamlined approach, only the President, Director Of Operations, Communications Manager, or a qualified designate, approved by the President, shall be granted access to the Company's social media accounts.

Professionalism is expected in all postings; it is expected that all social media posts will be reviewed by the author or another SBC staff member to eliminate spelling mistakes and grammatical errors.

## Outward Publications

All outward publications shall to be approved by the President prior to agreeing or partaking in any events which will result in a publication.

Outward publications include, but are not limited to:

- Blog postings
- Newspaper interviews
- Video interviews
- Radio interviews
- Internet publications
- Essentially anything that is deemed 'going to print' or will be available to the general public or a specific focused group of individuals for observation

Once approval is granted to participate in interviews, there will be a brief discussion on the content and message to be conveyed from the employee participating with the President and Communications Manger.

Should the publication used for general distribution originate from SBC or should any employee have the opportunity to review their interview from the above noted outward publications; nothing shall be released for print, publication on any media, upload or display without the President's signed authorization.

SBC generated publications include but are not limited to:

- Newsletters to staff
- Newsletters to shareholders
- Invites to corporate functions
- Flyers or posters to be distributed outside of the property
- Modifications to the website

## Marketing and Branding

All printed material that is used for marketing or branding shall be review by the Communications Manager, verified by the Director of Operations and approved by the President prior to publication.

Such marketing and branding materials include but are not limited to:

- Can designs
- Bottle labels
- Merchandise orders
- Custom designed items

## Procurement

In efforts to reduce unnecessary waste of material and time, where applicable three competitive numbers will be sourced for all items to be purchased.

All purchases over \$100 are to be reviewed and approved by the Director of Finance. A purchase order number will provided and tracked by the Director of Finance. Purchases over \$1,000 shall be approved by the President.

At any point, the Director of Finance, Director of Operations or President may request to see proof of competitive pricing or quotes provided from the vendor.

Payments will not be issued until a proof of delivery is received by the Director of Finance, such as a packing slip or a signed Bill of Lading. Should no proof of delivery be available, payment will not be issued until the employee whom initially requested the purchase order sign for the receipt of goods. The invoice, purchase order and proof of delivery must all be present prior to issuing of any payments.

If one of these three items are missing, approvals of payments are at the discretion of the Director of Finance or the President.

## Delegation of Authority

Item	Safety Manager	Acting Supervisor	Head Brewer	Dir. Of Finance	Dir. Of Operations	President	Chairman of Board
<b>Health and Safety</b>							
First Aid Provided	Weekly Report	Immediately	N/A	N/A	Monthly Report	Monthly Report	N/A
Vehicle Damage	Weekly Report	When Safe	N/A	N/A	Weekly Report	Weekly Report	N/A
Hospital Trip	Immediately	Immediately	N/A	N/A	Immediately	Weekly Report	Monthly Report
Critical Injury	Immediately	Immediately	N/A	N/A	Immediately	Immediately	Monthly Report
Death	Immediately	Immediately	N/A	N/A	Immediately	Immediately	Immediately
<b>Signing Authority</b>							
Procurement	N/A	\$100	\$1,000	\$1,000	\$1,000	\$5,000	>\$5,000
Media Release	N/A	N/A	N/A	N/A	N/A	Unlimited	Unlimited
Hiring	N/A	Interview	Interview	Interview	Recommendation	Approvals	N/A
Discipline	If needed	If needed	If needed	If needed	Weekly Reports	Weekly Reports	N/A
Termination	If needed	If needed	If needed	If needed	Weekly Reports	Weekly Reports	N/A
<b>Operations</b>							
Branding	N/A	Support	Support	Consult	Accountable	Responsible	Inform
Marketing Material	Support	Support	Support	Consult	Accountable	Responsible	Inform
Social Media	Support	Support	Support	Support	Consult	Responsible	Inform
Server Training	Support	Responsible	Support	Support	Consult	Accountable	N/A
Beer Production	Support	N/A	Accountable	Support	Support	Responsible	Inform
Food Services	N/A	Support	Support	Consult	Responsible	Accountable	Inform

<p><b>Responsible</b> The "doer" is the individual(s) who actually complete the task. The "doer" is responsible for action/implementation. Responsibility can be shared.</p>	<p><b>Accountable</b> The accountable person is the individual who is ultimately answerable for the activity or decision. This includes yes/no authority and veto power.</p>	<p><b>Consult</b> The consult role is the individual(s) that are typically the subject matter experts to be consulted prior to a final decision or action. This is a predetermined need for 2-way communication.</p>	<p><b>Inform</b> This is the individual(s) who needs to be informed after a decision or action is taken. They may be required to take action as a result of the outcome. It is a one-way communication.</p>	<p><b>Support</b> The support person is the individual who can be called on for help or guidance. This is 2-way communication.</p>
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<b>ATTACHMENT “A” EXAMPLES OF E-MAIL/INTERNET USES</b>	
<b>Permitted Uses</b>	<b>Prohibited Uses</b>
<p><b>E-mail</b></p> <ul style="list-style-type: none"> <li>• Sending, receiving, forwarding and replying to messages for business purposes</li> </ul>	<p><b>E-mail</b></p> <ul style="list-style-type: none"> <li>• Sending confidential or privileged information of any kind (e.g. financial, management, legal or operational) to unauthorized personnel</li> <li>• Opening file attachments or enclosures without performing a virus scan</li> <li>• Expressing personal opinions</li> <li>• Language that may be interpreted as negative or derogatory</li> <li>• Forwarding e-mail chain letters</li> </ul>
<p><b>Internet Browsing</b></p> <ul style="list-style-type: none"> <li>• Connecting to and viewing any web page for well-defined business purposes</li> <li>• Printing web pages for business purposes</li> </ul>	<p><b>Internet Browsing</b></p> <ul style="list-style-type: none"> <li>• Connecting to any site for non-business purposes</li> <li>• Connecting to web sites related to illegal, immoral, and/or unethical materials</li> </ul>
<p><b>Downloading Data</b></p> <ul style="list-style-type: none"> <li>• Downloading files/information from reliable major commercial sites to an isolated or quarantined folder until downloaded data is scanned for viruses, worms, etc.</li> </ul>	<p><b>Downloading Data</b></p> <ul style="list-style-type: none"> <li>• Downloading files/information not related to Company business, including screen savers, pictures, etc.</li> <li>• Downloading files/information related to illegal, immoral, and/or unethical materials</li> </ul>
<p><b>Internet Newsgroups</b></p> <ul style="list-style-type: none"> <li>• Approved groups may be accessed for business purposes by approved users</li> </ul>	<p><b>Internet Newsgroups</b></p> <ul style="list-style-type: none"> <li>• Accessing any group for non-business reasons</li> <li>• Accessing newsgroups related to illegal, immoral, and/or unethical materials</li> <li>• Accessing Internet chat rooms on any topic</li> </ul>

Contact List:

Name	Position	Contact Number	Contact Email
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