



GAZZOLA PAVING LIMITED

Employee Code of Conduct Policy

The Gazzola Paving Limited Code of Conduct brings together a number of existing Gazzola policies and provides additional guidance to all employees ensure compliance.

Gazzola Paving Limited (“Gazzola”) conducts its business with integrity and respect for candidness, truthfulness, and high standards of business ethics. The organization requires that its employees and business partners adhere to these high standards. All employees of Gazzola’s operating companies, must fulfill their responsibilities with honesty and integrity, and must comply with all applicable laws and regulations.

Gazzola provides a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards.

Scope:

This policy applies to all of the Gazzola operating companies.

Communication:

This policy is communicated to all employees of the Gazzola operating companies through the 4S Training platform.

Code of Conduct Policy:

Our Core Values

Honesty

- We are open, candid and truthful.

Integrity

- Our word is our bond. We do what we say.
- We live up to the highest standards of fairness and ethical behavior.

Respect

- We work hard to earn our business partners’ trust and respect on every project.
- We are all responsible for building and protecting our reputation as the contractor of choice.

Passion

- We love what we do.
- We take the lead, and we lead by example.

Our Commitment

In support of our core values, each employee, of a Gazzola company, commits to abide by this Code of Conduct. Each of those persons also commits to abide by all the policies referenced in this code that are relevant to that person. Violations will be the cause for corrective action, which may result in disciplinary action up to and including termination of employment or services contract.

Obey the Law & Act Ethically

We will conduct our business in accordance with all applicable laws and regulations.
We will conduct our business in accordance with the highest standards of ethics. Most ethical problems can be avoided by exercising common sense.



GAZZOLA PAVING LIMITED Employee Code of Conduct Policy

The following statements are warning signs that you are on ethical thin ice:

- “Well, maybe just this once. . .”
- “No one will ever know.”
- “It doesn’t matter how it gets done as long as it gets done.”
- “It sounds too good to be true.”
- “Everyone does it.”
- “Shred that document.”
- “We can hide it.”
- “No one will get hurt.”
- “What’s in it for me?”
- “This will destroy the competition.”
- “We didn’t have this conversation.”
- “This is a ‘non-meeting’.”

You can probably think of many more phrases that raise warning flags. If you find yourself using any of these expressions, stop, think and ask yourself, “Am I acting ethically?”

When confronted with a situation which raises a concern, ask yourself:

- Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- How will I feel about myself afterwards?
- Would I think that others were acting unethically if they acted this way?
- How would it look in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?
- How would I feel if my family, friends and neighbors knew what I was doing?

Promote a Positive and Ethical Work Environment

We will provide a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards. We must be careful in our words and our conduct to avoid placing, or seeming to place, pressure on others that could cause them to deviate from acceptable ethical behavior. While all of us must contribute to the creation and maintenance of such an environment, our executives and management personnel assume special responsibility for fostering a positive and ethical work environment

The following conducts and/or behaviours by an employee, while not all-inclusive, are serious infractions that may result in immediate suspension (with pay) pending further investigation. Subsequent termination for cause may occur for the following:

- Theft in any form of company, co-worker and/or client property;
- Falsification of Company records, including timecards or buddy punching, or falsifying client records;
- Illegal gambling as described by the Criminal Code of Canada on Gazzola property and/or on Gazzola paid time;
- Taking part in any illegal activity on Gazzola property;
- Use of profanity, threatening, abusive and/or seriously offensive language or actions in the workplace;



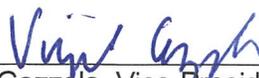
GAZZOLA PAVING LIMITED

Employee Code of Conduct Policy

- Possession or use of alcoholic beverages, narcotics or illegal drugs on Gazzola premises.
- Reporting/returning to work under the influence of same;
- Failing to advise to your Manager/Supervisor if you are taking a prescribed drug which may dangerously impair your judgement and cause harm to you or your co-workers;
- Physical altercations on Gazzola premises. *Examples of physical altercations include actual or attempted physical attacks or threats of exercising physical attacks such as:*
 - Punching
 - Shoving
 - Hitting
 - Biting
 - Kicking
 - Sexual assault
 - Scratching
 - Spitting
- Harassment of any nature, including but not limited to verbal or sexual harassment;
- Indecent or immoral conduct; and
- Disregard for safety policies and/or procedures.

The following conducts and/or behaviours, while not all-inclusive, if repeated, are considered action that will be subject to disciplinary action up to and including termination for cause:

- Disorderly conduct which causes disruption to clients or co-workers;
- Actions which willfully, or with gross negligence, cause the destruction or damage to Gazzola property or that of co-workers;
- Conducting personal, non-business functions during working hours, including, but not limited to, use of personal cell phones (whether for texting or taking calls in undesignated areas), sleeping, or reading personal materials (including novels, magazines and/or newspapers);
- Insubordination;
- Smoking in non-designated areas;
- Participating in the spreading of malicious gossip, damaging rumours and/or engaging in behaviours that will result in an inharmonious workplace;
- Engaging in pranks, contests, feat of strength, unnecessary running or rough and boisterous conduct;
- Eating and/or storing food in non-designated areas;
- Creating or contributing to unsanitary conditions;
- Conversations of an offensive nature occurring in the workplace; and
- Unauthorized personal use of telephones, computers, vehicles or any other employer-owned equipment.



Virgil Gazzola, Vice-President

March 17, 2022

Date