



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.



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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;



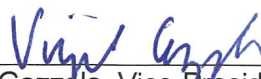
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- Possession or use of alcoholic beverages, narcotics or illegal drugs on Gazzola premises.
- Reporting/returning to work under the influence of same;
- Failing to advise to your Manager/Supervisor if you are taking a prescribed drug which may dangerously 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



GAZZOLA PAVING LIMITED

Company Rules Policy Statement

Gazzola Paving Limited has established Company Rules to express the expectations from all employees regarding their behaviour towards co-workers, supervisors, management and the whole company while at work. Since every employee is responsible for Health and Safety in the workplace and to be active and assist in making the workplace safer, the Company Rules has also included basic company safety rules. Company Rules as a whole apply to every person at Gazzola Paving Limited regardless of their title or job duties.

Gazzola Paving Limited will ensure that written company rules are available as both standard and workplace specific rules and will ensure that the written copies are provided to each employee as part of the Red Book's newest version on an annual basis.

Gazzola Paving Limited expects all employees to comply with the company rules and will ensure consistent enforcement of these rules through supervisors and management in all work locations. If any employee violates the company rules, the progressive discipline policy and procedure will apply.

The Progressive Discipline Process will be used as an equal and unbiased means of enforcement of company rules, policies and procedures to all workplace parties.

A handwritten signature in blue ink, appearing to read "Virgil Gazzola".

Virgil Gazzola, Vice-President

March 17, 2022

Date

Section 5 - Company Rules

PURPOSE

To express the expectations from all employees regarding their behaviour towards co-workers, supervisors, management and the whole company while at work.

Progressive Discipline will be used as a deterrent to prevent employees from working in an unsafe manner. This procedure will become a "last resort" management tool in the prevention of workplace accidents and/or unsafe acts or conditions.

SCOPE

Every employee is responsible for workplace Health and Safety - be active and assist in making the workplace a safer place to work by following all company rules, policies and procedures

Progressive Discipline will be used as an equal and unbiased means of enforcement of company policies and procedures to all workplace parties.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assisting in the development and review of the Company rules.
- Ensuring Company rules are clearly explained and understood by all employees.
- Ensuring a copy of the written Company rules provided to each and every employee annually as part of the Red Book.
- Assisting in the development of the Progressive Discipline Policy.
- Schedules and conduct discipline meetings with employees as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Maintain the documentation and records of Progressive Discipline.

Senior Management Responsibilities:

- Develop and review as required the Company rules (Standard & Site Specific).
- Ensure Company Rules are applied and consistently enforced on all work locations through managers and supervisors.
- Develop and review as required the Progressive Discipline Policy.
- Follow up on Supervisory Progressive Discipline documentation and recommendations as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensuring this policy is applied objectively, promptly and consistently to all Subcontractor and worker.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.

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- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Ensuring all workers know and understand the Company Rules.
- Ensuring all workers are following the Company rules on all work locations under their supervision.
- Take prompt and appropriate action any workplace party is working in an unsafe or ineffective manner.
- Documenting all disciplinary activities on the appropriate form.
- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Regularly communicate performance expectations with Subcontractors and workers and to confirm expected consequences of non-compliance.
- Ensuring this policy is applied objectively, promptly and consistently to all Subcontractor and worker.
- Take prompt and appropriate action any workplace party is working in an unsafe or ineffective manner.
- Documenting all disciplinary activities on the appropriate form and report to the Superintendent.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of.
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Work in a manner that is consistent to all corporate policies, procedures and training objectives.
- Advise Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

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COMPANY RULES PROCEDURE

Gazzola Paving Limited has developed written standard and site-specific company rules that will apply to all employees regardless of their rank or position.

Management will ensure company rules (Standards and Site-specific) are clearly explained and understood by all employees upon hiring and regularly by ensuring a written copy of the company rules is provided to each employee at least annually as part of the Red Book during the Annual Refresher Orientations.

Senior Management will monitor to ensure the implementation and consistent enforcement of the company rules throughout the whole organization through Managers and Supervisors. Any employee to be found in violation with the Company rules may be disciplined according to the progressive discipline policy and procedure.

STANDARD COMPANY RULES

Personal Electronic Devices: Personal electronic devices (including cellular phones, music devices and radios) are not permitted to be used while working and shall remain with personal belongings (out of sight) during working hours. Electronic earbuds and headsets for music devices and cellular phone are not to be used.

Personal Protective Equipment (P.P.E.): Minimum P.P.E. for projects and the Asphalt Plant consists of: C.S.A. Type 1 Class E hardhat, C.S.A. 'Green Patch' safety boots, C.S.A. Class 2 or equivalent high visibility vest or jacket and C.S.A approved safety eyewear.

Specialized Personal Protective Equipment: In order to undertake some workplace tasks, specialized PPE must be worn. (i.e. Working at Heights, Confined Spaces, Grinding of Asphalt containing Asbestos) Specialized PPE will be provide by Gazzola when required.

Clothing: For worker protection clothing should not be loose or torn. Boot soles should not be oily or slippery. The wearing of rings, bracelets and necklaces should be avoided and hair longer than shoulder length should be secured so it does not present a hazard. Sleeveless shirts and shorts are not allowed on construction projects, at the shop or at the asphalt plant. Hand, face and skin protection are to be worn when required to protect the worker from potential hazards.

No Smoking or Vaping: 529 Carlingview Drive and 345 Attwell Drive are completely smoke and vaping free properties. Furthermore, as per the Smoke Free Ontario legislation, smoking is prohibited in any of Gazzola's vehicles and equipment. Smoking is strictly prohibited near flammable or combustible gases and materials. Obey all 'No Smoking' signs.

Zero Tolerance for Drugs and Alcohol: Drugs and alcohol are not permitted on company property, in company vehicles or on projects. Any worker found in possession of or under the influence of drugs or alcohol will be disciplined up to and including dismissal. All employees are expected to be Fit for Duty when reporting for work.

Prescription Medications: Tell your Foreman/Superintendent of any prescription medication you are taking that may impair your ability to work safely and/or operate vehicles and equipment.

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Reporting Injuries, Vehicle Accidents, Incidents & Near Misses: All injuries, vehicle accidents, incidents, and 'near misses' - no matter how minor - must be reported immediately to your Foreman/Superintendent. The Foreman/Superintendent will conduct his/her investigation and report it to management.

Reporting Unsafe Practices and Conditions: Workers are obligated by law (and Gazzola Paving Limited) to report unsafe practices or hazardous conditions immediately to your Foreman/Superintendent so that corrective action can be taken.

Zero Tolerance for Violence and Harassment: All reported cases of violence and harassment will be investigated and any worker found to be involved will be disciplined, up to and including dismissal.

Code of Conduct: All employees shall adhere to the Gazzola's Code of Conduct Policy and work within the core values noted of Honesty, Integrity, Respect and Passion.

SITE SPECIFIC COMPANY RULES

Placement of Tools and Materials: Never place tools or materials near edges / openings, as these items may fall onto someone below. Keep all tools and materials at least six feet back from edges and openings.

Heavy Lifting: Always seek assistance or use mechanical lifting devices when attempting to lift heavy material. Avoid awkward postures and use proper lifting techniques.

Path of Travel Safety: Avoid the path of travel of machinery. The Safe Limit of Approach is three meters from skid steers and ten meters from all other machinery and vehicles. When operators must enter Safe Limit of Approach zone, they must slow the equipment or machine to walking speed and not make any sudden movements.

Skid Steer Safety: Operators are to avoid sudden fast spinning and reversing movements as ground workers will have difficulty anticipating and reacting to movement.

Backing Vehicles and Equipment: Operators are to avoid reversing whenever possible. When the operator's view of the intended path of travel is obstructed, a signal person must be used to direct the operator. The signal person shall stand in a position that is in clear view of the operator but not in the intended path of travel. The operator is to stop backing immediately, put the vehicle in park and await further instruction (or get out and survey the scene personally) if visual contact is lost with the signaler (and/or any other workers) and if an Emergency Stop signal is sounded.

Equipment Operator Qualifications: Do not operate any equipment/machinery unless you have been given proper instruction and authority to do so.

Daily Vehicle and Equipment Inspection Checklists: Daily checklists are to be completed prior to operating mobile vehicles and equipment. Completed checklists are to be submitted for review and filing.

Riding on Equipment: No one should be riding in or on equipment unless they are in a proper seat with a seatbelt.

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Seatbelts: Seatbelts must be worn in all vehicles and when operating machines that have seatbelts.

Horseplay: Do not engage in any prank, contest, unnecessary running or boisterous conduct.

Power Tools: All electrical hand tools shall be grounded or double insulated.

Avoid Working Alone: Always use the 'Buddy System' to avoid working alone. If it is necessary, arrangements should be made by the foreman to check on the worker at regular intervals.

Compressed Gas Cylinders: All cylinders shall be transported, stored and secured in an upright position with the protective cap in place.

Do Not Remove: Do not remove or make ineffective, any protective device, equipment or thing, required by Gazzola or the Act and Regulations (i.e. seatbelts, guards, etc.). If your work requires the removal of a protective device, use appropriate safety measures to protect yourself and others; and when the work is finished (or you leave the area), replace the protective device immediately. Report any missing or defective protective devices to your Foreman/ Superintendent. Do not remove a Lock-Out-Tag-Out lock that you did not personally apply.

Designated Substances: If a worker comes into contact (or thinks they may come into contact) with a designated substance as prescribed under the Occupational Health and Safety Act and Regulations (i.e. asbestos, lead, mercury, etc.), the worker will stop working and immediately report it to their Foreman/ Superintendent for investigation and corrective action.

PROGRESSIVE DISCIPLINE

If any worker who willingly or unwillingly work in an unsafe manner or is not following corporate policies, procedures or training objectives, the **Superintendent/Foreman**, and the **Senior Management** must take reasonable precaution to prevent this situation from reoccurring including appropriate Progressive Disciplinary Actions.

The Corporate Progressive Disciplinary Policy is as Workers, Foreman, Subcontractors or others will be subject to any of the following disciplinary actions as is appropriate in the circumstance:

1. Verbal or written warning
2. Written warning
3. Removal, or suspension or dismissal

The Corporate Progressive Disciplinary Policy will be included in orientation package and communicated to all new hires. All disciplinary actions must be delivered in a fair and progressive manner. If disciplinary actions must be taken against our Worker or a Subcontractor, the following steps must be followed as a minimum;

1. The Worker or Subcontractor must be asked to stop work and proceed to a private location or appropriate safe location.
2. The **Superintendent/Foreman**, or **Senior Management** must be present when the disciplinary actions are taken and records must be taken.
3. The Worker or Subcontractor must be notified in writing of the reason for the disciplinary actions.

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4. The Worker or Subcontractor must also be given a chance to defend or explain his/her actions.
5. Documentation of the disciplinary actions will use our Progressive Discipline Letter by **Senior Management** and the **Health and Safety Coordinator** as well as the involved worker or Subcontractor.

Note:

- (1) Termination of a worker's employment can only be done with the consent of **Senior Management**.
- (2) If there is reason to believe that the worker may potentially become aggressive then do not put your safety at risk. Dial 911 immediately and request police services

DISTRIBUTION

Those employees being hired will be required to complete Red Book on-line training with knowledge tests stipulating that they have received, read and understood the company orientation package and expectations.

Subsequent, where a new process or guideline is developed and at least annually, **Health and Safety Coordinator** will revise the Red Book package and schedule the revised guidelines to be delivered to all workplace parties.

The distribution of the Progressive Discipline Policy will be performed by each **Superintendent** OR **Foreman** using the following steps:

1. Orientation with all workers to explain the Progressive Discipline Policy.
2. Communicated during Tailgate Safety Talks where required.

RECORDS

All completed checklists and acknowledgement sheets should be maintained on the employees file indefinitely.

If Progressive Discipline is used, the Superintendent, must ensure documentation is provided to the Senior Management and or Health and Safety Coordinator immediately for review. This information is to be maintained in the employee file indefinitely.