



FARM LENDING CANADA

Employee Manual

January 2024

Revised – Jan 2024



Table of Contents

-Table of Contents	2
Version Control.....	8
Introduction	9
Application of Policies.....	10
All policies contained in this Handbook will be:	10
Attendance	11
Guidelines	11
Employment Types	11
Hours of Work	12
Inclement or Severe Weather	12
Intent	12
Guidelines	12
Inability to Attend Work	12
If the business is satisfied that an employee could not attend work due to severe weather,.....	13
Arriving to Work Late.....	13
Leaving Work Early.....	13
Business Closures.....	13
Employee Communication.....	13
Professional Appearance and Conduct.....	13
Scent-Free Policy	14
Your Employment	14
Code of Conduct.....	14
Intent	14
Guidelines.....	14
If You Have any Questions on What to Do	15
Consequences for not following the Code.	15
Accessibility Policy (ALL PROVINCES EXCEPT ONTARIO).....	15
Intent	15
Guidelines	15
Accessibility Policy (ONTARIO ONLY).....	16
Intent	16
Definition	16
Guidelines	16

Communication.....	17
Telephone Services.....	17
Statements.....	17
Notice of Temporary Disruption	17
Assistive Devices.....	17
Service Animals	17
Support Persons.....	18
Feedback Process.....	18
Employment.....	18
Modifications to This or Other Related Accessibility Policies.....	19
Communication: Concern Resolution Process.....	19
Intent	19
Guidelines.....	19
Employees	19
Client and Industry Partners	20
Company Property.....	20
Intent	20
Guidelines	20
Information Systems & Electronic Devices	20
Return of Company Property	21
Confidentiality.....	21
Intent	21
Guidelines.....	21
Conflict of Interest.....	22
Intent	22
Guidelines.....	22
Hiring Practices	23
Inside Information.....	23
Private or Personal Business Interest Conflicts.....	23
Gifts and Entertainment	23
Drug, Alcohol and Smoking Policy	24
Intent	24
Guidelines.....	24
Definitions.....	24

Employee Responsibilities.....	24
Reasonable Accommodation	25
Consequences	25
Smoking / Vaping	25
Employee Personnel Files	25
Intent	25
Guidelines	26
Keeping Updated Contact Information.....	26
Medical Files.....	26
Confidentiality.....	26
End of Employment	26
Intent	26
Guidelines.....	26
Resignation.....	26
Harassment and Discrimination in the Workplace.....	27
Intent	27
Guidelines	27
Definitions.....	28
Reporting Discrimination or Harassment.....	29
Investigating a Claim of Harassment or Discrimination.....	30
Disciplinary Measures	30
Confidentiality.....	30
Health and Safety Policy	31
Intent	31
Guidelines.....	31
First Aid Services	31
Fire Safety	31
Building Evacuation.....	31
When an employee is injured at work, they are required to:	32
What to do if a co-worker is injured or ill:	32
At first indication of possible injury or illness you should consider the following:	32
Working Alone	32
News Media Guidelines	32
Intent	32

Guidelines.....	33
Spokespersons.....	33
Interview and Information Requests.....	33
Reporting and Delegation.....	33
Source of Detailed Information.....	33
Approval to be on Community Property.....	34
Outside Employment.....	34
Intent.....	34
Guidelines.....	34
Privacy of Confidential Information.....	34
Intent.....	34
Guidelines.....	34
Employee Information.....	35
Customer Information.....	35
Probation Period.....	36
Security & Loss Prevention.....	36
Building Doors and Alarms.....	36
Building Break - Ins.....	36
Employee Personal Belongings and Property.....	36
Social Media Policy.....	36
Intent.....	36
Guidelines.....	36
Visitors and Clients.....	37
Violence in the Workplace.....	38
Intent.....	38
Guidelines.....	38
Risk Assessment.....	39
Communicating a Risk of Violence.....	39
Work Refusal.....	40
Work Remotely.....	40
Intent.....	40
Guidelines.....	40
Preapproval Required.....	40
Eligibility.....	41

The following guidelines must be followed when an employee works offsite:	41
Safety.....	42
Data and Property Security	42
Compensation & Benefits.....	43
Intent	43
Employee Health Benefits.....	44
Employees will be enrolled in the Company’s mandatory Group Health Benefits upon hire.....	44
Overtime	45
Time Away from Work.....	45
Leaves of Absence	45
Intent	45
Guidelines.....	45
Bereavement Leave	45
Jury or Witness Duty	46
Unpaid Personal Leave.....	46
Religious Holidays	46
Paid Statutory Holidays.....	46
Holiday Calendar 2024 – 2025	47
Guidelines	47
Personal / Emergency Leave	48
Intent	48
Guidelines.....	48
Eligibility	48
General Guidelines.....	48
Reporting an Absence from Work:.....	48
Return to Work.....	49
Intent	49
Guidelines.....	49
Employee Responsibilities	49
Vacation.....	49
Intent	49
Guidelines.....	49
Vacation Time and Pay.....	49
Vacation Scheduling.....	50

Working While on Vacation	50
Talent Management.....	50
Intent	50
Employee Orientation	50
On - the - Job Training.....	51
Professional Development	51
Reimbursement and Employee Pay	51
Knowledge Sharing.....	51
Performance Process	52
Progressive Discipline	52
Intent	52
Guidelines.....	52
Acknowledgment	54
Acceptance of Employee Handbook.....	54

Introduction

Welcome to Farm Lending Canada (hereafter referred to as the “Company”) With a head office situated in Chatham, Ontario, the Company serves customers across the country in every province except Quebec, Iqaluit, and the Yukon and Northwest Territories.

Established in 2005, FamilyLending.ca Inc. (FamilyLending.ca) is focused on making getting a mortgage easier for our borrowers. Although primarily residential, FamilyLending.ca brokers mortgages for agricultural and commercial borrowers as well. With thousands of satisfied customers across Canada, we’re proud of our team, our partners, and the great work they do.

Recognizing a gap in expertise in Canadian agricultural lending, AgriRoots Capital Management Inc. (AgriRoots), was established in 2019 and, until very recently, was the only alternative lender in Canada focused on this sector. With a team of both agricultural and financial experts, AgriRoots provides alternative lending to agricultural producers and related businesses with the objective of getting them established or financially restructured to be able to borrow from Tier A lenders. AgriRoots works in tandem with FamilyLending.ca to broker these mortgages through the AgriRoots Diversified Lending Fund (ADLF) LP.

Farm Lending Canada is an established business that provides exceptional services and products to their customers and have the impeccable professional reputations you’d expect. Upholding our brands and their associated positive attributes and quality of service is an extremely important role that each Company team member must play not only because of the stringent professional and compliance expectations within our industry, but also because it’s integral to who we are.

We’re so glad to have you as part of our family – and we can’t wait to see where this journey takes you!

Application of Policies

The term “Company” refers to Farm Lending Canada

All employees are required to review and abide by all the terms contained in this Employee Handbook.

Policies and procedures in this Handbook have a Company - wide application to provide a basis for consistent and appropriate decision - making and provide guidance for employees. The policies, procedures and guidelines in this Handbook apply to all employees, regardless of position or level of position within the Company, unless otherwise indicated.

While every possible effort to make this Handbook comprehensive has been made, it cannot address every possible application or exception. As such, the Company reserves the right to exercise discretion in the interpretation and enforcement of policies and to revise or add to policies from time to time as deemed necessary.

Employees will receive periodic updates on these policies as the Company continues to grow, and employees are expected to familiarize themselves with these changes.

All policies contained in this Handbook will be:

- Presented in a common format, formally approved by management.
- Distributed to all relevant parties in a timely manner, located centrally and accessible to all parties;
and
- Kept current to the business needs and environment.

The provisions of this Employee Handbook are subject to any federal or provincial laws that may prohibit or restrict their applicability.

Daily Operations

Attendance

Intent

As an employer, the Company works with employees to accommodate scheduling needs while achieving the goals of the business. The Company supports their employees in maintaining a positive work-life balance. This policy outlines attendance expectations to establish standard of practice as well as support safe work practices.

Guidelines

The Company expects that every employee will be regular and punctual in attendance. This means being at work, ready to work at the agreed upon starting time each day. Absenteeism and tardiness place a burden on other employees and on the Company.

The Company understands that from time-to-time things may come up that do not allow employees to attend work. If an employee is unable to report for work or may be late for any reason, they must notify their immediate supervisor / manager using the Humi software. Employees must notify their immediate supervisor / manager or the business on the first day of absence, and every day after, that they are absent from work.

If there are urgent matters that need to be taken care of in the employees' absence, they must inform their immediate supervisor / manager so these matters can be looked after.

Eligible employees may qualify for paid time off provisions as outlined in the Personal Time policy.

Employment Types

Salaried Employees are paid a fixed amount of money or compensation.

Full - Time Employees are employees who regularly work a full week and carry out a continued function. These employees are eligible for our Employee Health Benefits program.

Part - Time Employees are employees who work on a regular basis, generally less than thirty (30) hours per week. These employees are eligible for our Employee Health Benefits program if they regularly work more than twenty (20) hours per week, per the terms of the plan provider.

Contract Employees work on a fixed term or contract basis for an agreed length of time or to perform a specific task or to work on a specific project. They may also be hired to replace an employee on a leave of absence. These employees are not eligible for our Employee Health Benefits program, per the terms of the plan provider.

Independent Contractors provide specialized services and are not considered employees. They operate as their own business and will be governed by the terms of their signed agreement with the Company. They are considered separate from the Company; however, they must abide by the Company's Standards of Conduct policies, procedures, and guidelines (as outlined in this Handbook) while providing services to the Company. Independent Contractors are not eligible for our

Employee Health Benefits program, per the terms of the plan provider.

Hours of Work

Operating hours are 8:30 a.m. – 5:00 p.m., Monday to Friday. You will work with your direct supervisor to create your regular schedule, with the Company maintaining a balance of 8:30 a.m. to 4:30 p.m. and 9:00 a.m. to 5:00 p.m. schedules to provide adequate client coverage.

The Company is a client service - oriented business, and as such, employees may be required from time - to -time to provide a service during days or times outside of regular operating hours. Work schedules will be determined by the employee's direct supervisor / manager based on operational needs.

Employees receive a one - hour unpaid meal break for each full shift they work from Monday to Friday. Employees who work alternative shifts throughout the week will receive unpaid breaks in alignment with applicable Employment Standards legislation. If the employee chooses not to take their unpaid meal period, the time may not be used as a reason to leave work early, nor banked, nor taken as paid time.

Inclement or Severe Weather

Intent

The Company recognizes that unfavorable weather conditions can prevent employees from reaching their place of employment and in certain circumstances may require the business to temporarily close. The Company will always ensure that the health and safety of all employees is never compromised. This policy outlines the expectations of employees and the Company in case of severe weather.

Guidelines

It is expected that all employees will make every reasonable effort to reach their place of employment every day, when scheduled, and be on time for work. However, employees are not expected to, and should never place themselves at escalated risk. No employee will be required to attend work if it is unsafe to do so therefore the Company recognizes that on occasion, severe weather can prevent employees who live outside of the community or in remote areas from getting to work. Employees should be prepared to make appropriate arrangements in relation to attendance at work.

Inability to Attend Work

If employees are unable to attend work due to severe weather, they must contact their immediate supervisor / manager as early as possible by phone or text message by phone or text message, then on the Humi HRIS (Human Resources Information System). Each situation will be managed on a case - by - case basis.

If the business is satisfied that an employee could not attend work due to severe weather,

the following options may apply, with the approval from the immediate supervisor / manager:

- The employee can work remotely if their position allows, and they have the appropriate equipment with them to do so. Where a work remotely arrangement has been made, employees will be paid their regular wages.
- Use any accrued personal time and apply it towards their days absent.
- Use any accrued personal vacation time and apply it towards their days absent.
- Take the day as an unpaid leave of absence.

Arriving to Work Late

If an employee will be late for work due to severe weather, they must contact their immediate supervisor / manager as early as possible by Humi, then by phone or text message as needed.

Leaving Work Early

The employee's immediate supervisor / manager will decide whether the request to leave work early due to severe weather is warranted or not. Before making decisions, information will be obtained by listening to all weather advisories / alerts / warnings for the area by contacting Environment Canada.

Business Closures

At times, emergencies such as severe weather, fire, flooding, wind, snow, or power failures can temporarily disrupt operations. While the Company will try to notify employees if the workplace must be closed due to one of these situations, it is still the responsibility of the employee to contact their immediate supervisor / manager to find out if the business has been temporarily closed or not, and when it is scheduled to re - open.

Employee Communication

In a workplace emergency, event, and / or office closure, the Company will make every effort to notify employees via Humi HRIS or by text message or phone of the business closure through their immediate supervisor / manager or Human Resources.

Best efforts will be made by the Company to ensure communication to all employees. However, in situations where communication is difficult or unlikely, employees are asked to use common sense and make the best decisions they can to ensure their safety. In cases where the business is not closed, an employee should only come to work if they feel they can do it safely. Employees are not to take unsafe risks to report to work. Employees who have any further questions related to this policy can speak directly with their immediate supervisor / manager.

Professional Appearance and Conduct

The Company values its positive profile in the business community and therefore each employee has a responsibility to ensure that the image they portray is of the highest standard. Employees will act as ambassadors of the Company's business initiatives both inside and outside of the workplace.

It is Company policy that employees present a professional image whether they are at work, traveling on business, attending business functions, participating in training events, and /or participating in other business -related activities. Employees must be well groomed and dressed appropriately for the Company business and for their position. The goal is to provide a work environment that is professional and tasteful, yet comfortable by encouraging a "business casual" dress code.

Employees are expected to use good judgment by dressing in a way that respects the expectations of the Company, industry partners and co-workers and is appropriate to specific business situations. If employees have questions about appropriate attire, they are encouraged to ask their immediate supervisor / manager for clarification.

Scent-Free Policy

Due to the health concerns arising from exposure to scented products, the Company has instituted this policy to provide a scent-free environment for all employees and visitors. The use of scented products in the workplace is to be avoided to provide employees and clients with a healthy and safe environment.

Your Employment

Code of Conduct

Intent

Employees need to come to work each day ready to perform our jobs ethically, and to the best of our abilities, in a way that adds value to the Company and preserves the Company's reputation within the business community. The Code outlines some of the various situations that employees may encounter. While it is not possible to cover every situation that an employee could face, the Code covers the basic principles that every employee must follow.

Guidelines

Below are the basic principles on how the Company conducts business and expects employees to respect and maintain:

- Make business decisions in the best interest of the Company.
- Avoid situations where your personal interests' conflict or might conflict with the interests of the Company. If unavoidable, be sure to declare where there is a conflict of interest or the appearance of a conflict.
- Understand and comply with all laws, regulations, and rules that apply.
- Respect and maintain the privacy of information belonging to employees, contractors, industry partners, and clients.
- Protect Company information and assets.

- Protect the Company's assets from loss, misuse, and theft.
- Obtain competitive information in a legal manner.
- Always be courteous and respectful.
- Maintain a safe and healthy work environment.
- All employees are expected to respect each other and each other's work area and personal belongings.
- Employees are to refrain from gossip regarding other employees, contractors, brokers, agents, or clients. All employees are expected to work as a team.
- Employees will not arrive at work impaired or consume alcohol or drugs during the workday.
- Use email, internet, or phone provided at work respectfully, and do not access, send, or download any information that could be insulting or offensive to any person.

Many of the topics covered in the Code are also governed by specific key Company guidelines, policies, or directives outlined in this Employee Handbook which should be referred to for more detail.

If You Have any Questions on What to Do

When in doubt as to what to do in a particular situation, employees must exercise proper judgement by seeking additional information and guidance before acting. Below are steps to keep in mind when a question or problem arises.

- To reach the right solutions, all employees must be as fully informed as possible. Therefore, ensure you have all the facts.
- Ask yourself:
 - » What specifically have I been asked to do?
 - » Does it seem unethical or improper? Use common sense. If something feels like it could possibly be unethical or improper, it likely is.
 - » If the result of my actions appeared on the news, would it be embarrassing to me, the Company, or my family?
- Discuss the problem with your immediate supervisor/manager as they are accountable to provide basic guidance for all situations and they have the responsibility to help solve problems.
- Be sure to always 'ask' first and 'act' later. Seek guidance first before acting when you are unsure of what to do.

Consequences for not following the Code.

Failure to follow the Code may lead to progressive discipline in alignment with the Progressive Discipline Policy.

Accessibility Policy (ALL PROVINCES EXCEPT ONTARIO)

Intent

The Company is committed to achieving accessibility and meeting the needs and abilities of all. We value diversity and believe in inclusion, and we strive to provide goods and services and access to our premises in a way that respects the dignity and independence of employees, contractors, clients, and industry partners. The Company is committed to meeting the requirements of all accessibility legislation applicable within each province.

Guidelines

The Company will meet the needs of all individuals that interact with the business, with respect to communication, assistive devices (wheelchairs, walkers, and oxygen tanks), service animals, and support persons presented by employees through training and by offering to communicate in different ways and taking time to understand and respond to what is needed. Signs, documents, and electronic communication will use plain language and be easy to read.

The Company will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and once people are hired. When needed, we will provide customized workplace emergency information to employees who have a disability. When using the Company performance management or career development programs, we will consider the accessibility needs of employees with disabilities. Do not hesitate to contact your supervisor / manager if you require accommodation to a disability or medical condition at any point during your employment with the Company.

Please note that employees will not be required to disclose the details of the medical condition or disability, only the kind of help required. The information provided will be kept confidential and will only be shared with consent.

Employees who have questions or who already have emergency response information plans in place that need adjustments, are encouraged to speak with their immediate supervisor / manager or the Director, Human Resources.

Accessibility Policy (ONTARIO ONLY)

Intent

We are committed to meeting the requirements of the accessibility standards, established by Accessibility for Ontarians with Disabilities Act (AODA), 2005, Integrated Standard regulations. This policy applies to all goods and services delivered by the Company and is consistent with the four customer service principles of the AODA: namely dignity, equity, independence, and integration.

Definition

Disability includes, but is not limited to:

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

Guidelines

The Company is committed to excellence in customer service, and to providing our products and services in a way that respects the dignity and independence of persons with disabilities. We are also committed to ensuring that customers with disabilities receive accessible products and services with the same quality and with similar timeliness as others do.

Communication

We will communicate with people with disabilities in ways that consider their disability.

Telephone Services

We are committed to providing a fully accessible telephone service to our customers. We will train employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.

We will offer to communicate with customers by email, instant message conversation, or relay services if telephone communication is not suitable for a customer's communication needs or is not available.

Statements

We are committed to providing accessible statements to all customers. For this reason, statements will be provided in the following formats upon request and wherever possible: large print hard copy or email, email with text only electronic file that works with screen reading software, or review during in-person meeting with a suitable employee.

Notice of Temporary Disruption

The Company will provide customers with notice in the event of a planned or unexpected disruption to the services or facilities usually used by people with disabilities (e.g., a disruption to customer services phone lines, website, or physical access to our facility). This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

This notice will be placed on our websites: *FarmLending.ca* and *agriroots.ca*.

Assistive Devices

We are committed to serving people with disabilities who use assistive devices (e.g., wheelchairs, canes, walkers, oxygen tanks, hearing aids, other) to access our products and services.

We will ensure that our employees are familiar with various assistive devices that may be used by customers with disabilities while accessing our products or services.

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and other third parties. We will ensure that all employees are properly trained in how to interact with people with disabilities who are accompanied by a service animal. It is the responsibility of the person with a service animal to

always control the animal.

If an employee or other customer is allergic to animals, alternative arrangements will be made.

Support Persons

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter our premises with his or her support person.

At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. Additionally, people with disabilities may opt not to have their support person present, unless there is an overriding health and safety concern.

Employee Training

The Company will provide training to employees, volunteers, consultants, and others who provide goods or services on our behalf.

Training will include:

- A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429 / 07);
- How to interact and communicate with people with various types of disabilities.
- The Ontario Human Rights Act
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- How to use the equipment or devices available on our premises, where provided, that may assist with the provision of products or services to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing our products or services; and
- Our policies, practices and procedures relating to the provision of products or services to people with disabilities.

Employees and others will be trained, as appropriate, in policies, practices and procedures that affect the way products and services are provided to persons with disabilities. They will also be trained on an ongoing basis when changes are made to these policies, practices, and procedures.

Feedback Process

The goal of the Company is to meet and exceed customer expectations in serving customers with disabilities. The Company welcomes feedback from the public to continually improve our services. Feedback regarding the way the Company provides goods and services to people with disabilities can be made by contacting the Director, Human Resources via e-mail, verbally, or by phone. Customers can expect a response in ten (10) business days regarding their feedback if a response is appropriate.

Employment

The Company will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and once people are hired. When needed, we will provide customized workplace emergency information to employees who have a disability.

When using the Company's performance management or career development programs, we will consider the accessibility needs of employees with disabilities. Do not hesitate to contact your manager if you require accommodation to a disability or medical condition at any point during your employment.

Modifications to This or Other Related Accessibility Policies

The Company is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. As such, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of the Company that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

This Accessibility Policy is to be posted and retained in a clearly noticeable location in the workplace. The Company is committed to reviewing this policy on an annual basis, or more frequently where necessary.

Further information on any of the above policies and the applicable programs and procedures can be obtained from your supervisor/manager.

Communication: Concern Resolution Process

Intent

The Company values open communication and encourages input from employees, contractors, clients, and industry partners on matters that impact their work and the working environment. This policy outlines proper procedure for communicating and addressing concerns within the workplace. Please note, should your concern involve potential harassment or discrimination in the workplace, please refer to the Harassment and Discrimination in the Workplace policy. Similarly, should your concern involve potential violence, please refer to the Violence in the Workplace policy.

Guidelines

Employees

There may be times when employees have a job-related problem, question, or concern. If this happens, and the concern is not related to potential harassment, discrimination or violence in the workplace, employees should discuss it with their immediate supervisor/manager. By doing this, employees usually reach the simplest, quickest, and most satisfactory solution.

If an employee is either uncomfortable discussing a job-related problem with their immediate supervisor/manager, or if they feel they were unable to come to a satisfactory resolution, they are encouraged to speak with the next manager in the chain of command or the Director, Human Resources. However, reasonable attempts must be made to resolve concerns/conflicts first, before speaking with the next manager in the chain of command. Concerns will be addressed as quickly as possible, and the employee will be kept informed of the progress and resolution.

Client and Industry Partners

On occasion, clients or industry partners may express concerns or experience problems with some aspect of the business. How employees react to addressing these concerns is very important in maintaining positive relationships, moving forward and in preventing the situation from occurring again.

Employees are expected to listen to the complaint and be understanding. In most cases, the individual has concerns about the business and not about the employee personally. Employees will record the details of the complaint in the case that the information must be passed on to other members of the Company to assist in resolution.

The Company encourages employees to discuss concerns with their immediate supervisor / manager and provide suggestions and ideas on options for fixing the problem, prior to making promises to the concerned party.

Company Property

Intent

The Company provides employees with the resources and equipment necessary to perform the duties of their positions. The Company believes employees are trustworthy and will exercise good judgment when accessing or using Company property. This policy outlines how Company property is to be used, maintained, and returned upon termination of employment.

Guidelines

Company property includes (but is not limited to) the following:

- Electronic devices such as computer, cell phone, tablet
- Keys that access Company property
- Intellectual property

During employment, employees are expected to treat Company property with respect and care, as they would reasonably do with their own personal property. Unauthorized possession or removal of Company property is a serious offense and will be treated as such.

Information Systems & Electronic Devices

Information systems and electronic devices, such as computers, printers, photocopiers, smart phones, software, e - mail, landline phones, cellular phones, fax machines and internet access are tools that the Company may provide to their employees to assist them in their work. These resources and related access systems are the Company's property and subject to monitoring, review, or access by the Company at any time. They are provided for business purposes, however, occasional use for personal reasons is permitted.

The following guidelines on information systems and electronic devices must be always adhered to:

- They are normally to be used for business purposes only. Personal usage is generally allowed only during times when business activities and patron service will not be disrupted.

- Messages and communications sent via the Company's information systems and electronic devices are subject to subpoena and access by persons outside of the Company and may be used in legal proceedings. Please consider this before sending any confidential messages or material.
- Remember that all the Company's policies, including, but not limited to, policies on Respectful Workplace, Confidentiality and Code of Conduct, apply to the use of the Company's information systems and electronic devices. Employees must not view or forward sexually explicit, profane, or otherwise unprofessional or unlawful material through the Company's network and electronic devices.
- Employees may not install any software or program on any of the Company's computers or other hardware without the expressed consent of their immediate supervisor / manager.
- The Company expressly prohibits the unauthorized use, installation, copying or distribution of copyrighted, trademarked, or patented material.
- Employees must not attempt to override or evade any program or measures installed by the business to protect the security or limit the use of its information systems and electronic devices.

The Company retains the right to monitor and review all communications conducted and data saved, reviewed, or accessed via the Company's information systems and electronic devices. No user should have the expectation of privacy as to their computer-related usage at work whether for business or personal reasons.

Inappropriate use of information systems and electronic devices may result in disciplinary action in alignment with our Progressive Discipline policy, or in some cases, termination of employment. Employees should be careful to safeguard their passwords, log off their computer terminals when not in use, and not permit unauthorized users.

Return of Company Property

Upon the conclusion of employment with the Company, all Company property must be returned in good working order.

Confidentiality

Intent

This policy intends to outline how the Company employees are to manage confidential information throughout the course of their work. Improper use of the Company confidential information outside of the organization is a serious matter. This policy aims to define the meaning of confidential information, provide guidance on how to manage such information as well as the employee's obligation to maintain confidentiality through the course of their work.

Guidelines

Through the course of employment, the Company employees may be exposed to confidential and proprietary information. This information may not be discussed outside the Company without the consent of the Company. Confidential information should only be discussed with other employees in the workplace as necessary to complete the processing of daily business. Confidential and proprietary information includes and is not limited to the following:

- Client information
- Financial information
- Business strategies

- Contracts
- Human resources information including payroll.
- Technology and computer systems
- Policies and procedures
- Any other proprietary or confidential information relating to the Company or clients.

Employees must ensure that any materials containing confidential or proprietary information is locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or exposed. Confidential information must not be discussed where it can be overheard by individuals external to Company operations.

Confidentiality of Company information extends beyond the duration of an employee's employment relationship and must remain confidential following termination of employment (voluntary or involuntary).

Conflict of Interest

Intent

The purpose of this policy is to set expectations and protect the Company and its employees from conduct that could potentially lead to a conflict. To preserve the integrity of the business, and the Company's reputation within the business community, employees must proactively identify potential conflicts of interest as they may arise.

Guidelines

A conflict of interest is a situation in which any employee of the Company - either for their own benefit, or the benefit of some other person - attempts to promote a private or personal interest which results or appears to result in an interference with the objectives and duties of the Company or gains an advantage by virtue of their position in the business.

A conflict of interest occurs when a personal interest can influence an employee's ability to make honest and ethical business decisions in the best interests of the Company. A conflict of interest can arise when an employee takes actions or has interests that may make it difficult for them to perform their work for the Company objectively and effectively.

Conflicts of interest may also arise when an employee or a member of their family receives personal benefits because of the employee's position with the Company. For example, accepting gifts, favors, or entertainment may influence or be perceived to influence their ability to make objective business decisions.

If any employee perceives that a conflict of interest exists or has potential to develop even because of their relatives or close associates' financial dealings, and/or a relative or close associate of employment, the employee must ensure that a conflict ceases to exist or develop and must distance themselves from the situation to avoid such a conflict.

The potential for conflicts of interest may exist in the workplace and employees are expected to use reasonable judgment in determining whether a given situation could lead to a conflict, constitutes a conflict, or could be perceived as a conflict.

The onus is on all employees of the Company to ensure that conflict of interest is avoided in all circumstances.

If employees are faced with, and are unsure how to handle, a situation that they believe may be a conflict of interest, they should notify their immediate supervisor / manager. Violations of this policy may lead to disciplinary action in alignment with our Progressive Discipline policy. Employees will not be excused from adhering to this policy on the basis that they did not realize that a conflict of interest existed or may arise.

The following guidelines below include some common conflict of interest issues; however, it should not be considered a definitive listing as it would be impossible to list every situation.

Hiring Practices

The Company is committed to hiring the most suitable and best qualified candidate for any position within the Company to ensure business goals, objectives, and initiatives are met.

Inside Information

Through their work, Company employees are sometimes privy to confidential information. This is referred to as inside information and includes such concerns as knowledge of new business opportunities, the financial stability of the business, etc.

Employees must not use inside information for the financial or personal benefit of themselves, their family, or associates. Employees must not disclose information about the business or the Company's clients to any unauthorized person outside of the Company.

Private or Personal Business Interest Conflicts

Company employees may pursue personal and private business interests as long as no conflict-of-interest results and the employee does not use their position to make personal profit, gain an advantage, or confer a benefit at the Company's expense. In addition, employees cannot be involved in the decision-making process of purchasing products or services for the Company from companies in which they hold a direct or indirect interest. There are legal requirements under brokerage regulations to be always aware of and in full compliance.

If an employee has any direct or indirect ownership, interest, or profit participation in outside business enterprises that have or may have dealings with the Company, the employee must disclose the details in writing to the Director, Human Resources.

Gifts and Entertainment

Business gifts and entertainment have the potential to compromise the objectivity and integrity of the Company. Employees should make every effort to avoid situations that give the appearance of a conflict of interest, such as an exchange of gifts with the expectation of business in return. Employees will exercise good judgement when accepting or giving gifts on behalf of the Company.

Drug, Alcohol and Smoking Policy

Intent

The Company is committed to providing a safe working environment for all. Being impaired at work is an extremely serious matter that affects the health and safety of all employees. The Company is committed to providing support to individuals who may be struggling with substance use or require medication that may impair them at work. This policy sets out responsibilities regarding alcohol and drugs in a work - related setting.

Guidelines

Impairment at work may have a negative impact and contribute to lost productivity, reduced work performance, and may increase the risk of workplace injuries, particularly when carrying out safety - sensitive duties. Further, any activity related to any drug or alcohol that is contrary to any applicable law and that occurs in a work - related setting may cause damage to the Company.

The following activities are prohibited where an employee is on Company premises, performing job functions or otherwise acting on behalf of the Company:

- The use of alcohol, or any drug that results in an employee being impaired.
- The sale, use, provision, possession of, or any other activity related to, any drug or alcohol that is contrary to any applicable law.

Definitions

“Drug” means (a) drugs legally obtained by a prescription issued by a person authorized to issue the prescription; (b) over - the - counter medication; (c) drugs which cannot legally be possessed in Canada; and (d) any other substance capable of causing a person to be impaired.

“Impaired” means an employee’s ability to carry out the employee’s job functions in a safe, efficient, or competent manner is negatively affected.

“Safety - Sensitive Duty” means an employment - related duty requiring the employee to provide services to clients in a safe and professionally competent manner. It may also include other duties as defined by the applicable professional codes of ethics as safety sensitive.

Employee Responsibilities

As a condition of employment, all employees must comply with the following while on Company premises, or while performing job functions or otherwise acting on behalf of the Company:

- Not breach any applicable law related to any drug or alcohol.
- Not be impaired.
- Determine, with the employee’s licensed doctor or pharmacist, whether any prescribed or over - the - counter drug the employee is taking to treat a disability may cause the employee to be impaired at work. If impairment at work may occur, the employee

must notify their immediate supervisor / manager and request accommodation.

- Employees required to perform any safety - sensitive duty must inform their immediate supervisor / manager about the employee's use of any drug or alcohol that may cause them to be impaired prior to performing their duties.
- Advise their immediate supervisor / manager whenever they believe another employee is impaired.

Reasonable Accommodation

An employee who may have the following may be eligible for accommodation:

- A drug or alcohol dependency, or
- A disability requiring prescription or over-the-counter medication which may cause impairment at work.

The employee has a responsibility to communicate their need for any accommodation to the Company and to cooperate with the accommodation and / or rehabilitation efforts. Self - disclosure is encouraged.

We are committed to supporting and accommodating employees who voluntarily disclose usage of drugs or alcohol, which causes or is likely to cause the employee to be impaired at work. Assistance and accommodation will be coordinated with the immediate supervisor / manager.

Employees who require rehabilitation for drug or alcohol dependency will be encouraged to seek professional care and support through their health care professional.

Consequences

Employees who present themselves as impaired will be asked to leave the workplace while they are impaired. The incident will be documented and presented to the Director, Human Resources. Employees who fail to comply with this policy, refuse to cooperate in rehabilitation or accommodation, or who continue to present themselves as a safety risk to themselves or others may be subject to progressive discipline, or in serious instances, termination of employment, and may also be subject to legal proceedings.

An employee who carries out safety - sensitive duties and who is involved in a safety - related incident before informing their supervisor / manager or a leader of the employee's dependency on, or use of, drugs or alcohol which may cause impairment may be terminated immediately for cause.

Smoking / Vaping

The Company is committed to maintaining a safe and enjoyable work environment for all employees and will abide by all legislation and laws related to smoking. All Company facilities are smoke - free environments; smoking of any kind is prohibited inside the Company's places of business, including e - cigarettes, cannabis, and vaping. Employees are permitted to smoke in outdoor designated smoking areas in alignment with applicable legislation.

Employee Personnel Files

Intent

The Company encourages open and honest communication between employees and management. This policy outlines how employees can access the information in their personnel file, how to update information within the file as well as how medical information relevant to their work is stored.

Guidelines

Employee files are the property of the Company. However, employees have immediate access to performance evaluations and other performance related documents that the employee has previously received through the Humi software.

In addition, employees may review the contents of their file in the presence of their immediate supervisor / manager or the Director, Human Resources. Employee personnel files cannot be removed from Company property or from the Humi software.

Keeping Updated Contact Information

All employees are responsible for keeping the Company notified of their current mailing address and contact information such as telephone numbers and e - mail addresses. Any changes to contact information must be kept up to date by the employee in the Humi software.

Medical Files

An employee's medical file is used to store information pertaining to their health and medical information received because of injury, sick leave, benefits, etc. and is kept separately for each employee. A medical file is strictly confidential and private. The contents of these files are never combined with any other employee file, such as the personnel file. Where medical files contain sensitive and confidential information, they will be kept in a safe and locked location.

Confidentiality

Personnel files will be kept in the Humi software and will only be accessed by authorized individuals for the purpose of carrying out the functions of the business. The Company will abide by provincial laws required for record keeping. Employee files will be kept for three (3) years after the employee has stopped working for the Company.

End of Employment

Intent

The Company values the contributions of all employees and strives to build long - lasting employment relationships. The following policy outlines legislative requirements if the employment relationship between the Company and an employee end.

Guidelines

Employment separations/terminations, whether voluntary or involuntary, will be handled with dignity and respect in a professional manner with minimal disruption to ongoing work functions.

Resignation

An employee may decide to end the employment relationship at any time. If an employee makes the decision to end employment with the Company, written notice must be provided to the

immediate supervisor / manager, considering legislative requirements for termination notice.

The Company requests two (2) weeks' notice, unless otherwise stated within the employees' employment agreement.

Employees may be asked to participate in an exit interview prior to their final date of employment to support continuous improvement of the Company's business operations. Employees may request an exit interview at any time prior to the end of employment.

On the employee's last day of employment with the Company, they shall promptly return (without duplicating or summarizing), all materials pertaining to Company business in their possession including, but not limited to all client information (see Confidentiality policy), physical property (including cell phones or equivalent, laptops, Company vehicles, tool, keys, electronic storage media), manuals, and reports. Employees must refrain from disclosing, copying, and reproducing or making any use of confidential information pertaining to the Company or any of its clients, suppliers, or employees which was acquired during employment.

Harassment and Discrimination in the Workplace

Intent

This policy applies to all employees, customers, contractors, suppliers, and to the public at the Company. The policy applies to all workplace locations, including Company sponsored events, off - site meetings, business trips, and any other event or place related to employment.

The Company is committed to building and preserving a safe, productive, and healthy working environment for its employees based on mutual respect. In pursuit of this goal, the Company does not condone and will not tolerate acts of harassment or discrimination against or by any Company employee, customer, contractor, supplier, or employee of the general public, while doing business with the Company.

Guidelines

Every employee has a right to freedom from:

- a) Harassment in the workplace by the employer or agent of the employer or by another employee because of race, place of origin, creed, citizenship, age, or any other reason outlined by applicable provincial legislation.
- b) A sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome.
- c) A reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement to the person.

This policy is not meant to interfere with an employee's right to Freedom of Speech or to interfere with everyday interactions. Generally, harassment is considered to have taken place if the person knows, or should reasonably know, that the behavior is unwelcome. Harassment, sexual or otherwise, can be defined as any behavior, in the form of words, gestures, or actions, generally repeated, that has undesired connotations, that has a negative impact on a person's

dignity or physical or psychological integrity, or that results in the person being subjected to unfavorable working conditions. is perceived as offensive, insulting, intimidating, and /or hurtful and generally includes unacceptable behavior (see the Workplace Violence Policy for more information)

Discrimination is any practice or behavior, whether intentional or not, which has a negative impact on an individual or group because of membership in a group protected by applicable provincial human rights legislation. This includes discrimination because of race, ancestry, place of origin, color, ethnic origin, and other factors as determined by applicable human rights legislation. Discrimination may arise because of direct differential treatment, or it may result from the unequal effect of treating individuals and groups in the same way. What one person finds unwelcome, others may not; therefore, it is important to remember that it is the perception of the receiver of the potentially offensive message which may be deemed objectionable or unwelcome that determines whether something is acceptable or not.

We expect all our employees, supervisor /managers, and contractors to help us maintain a workplace free of harassment and discrimination. Failure to do so will give rise to disciplinary in alignment with our Progressive Discipline policy, up to and including termination. We will not discipline, discriminate or retaliate against an employee because he or she has been or is perceived to have been a victim of workplace harassment or discrimination in good faith.

Definitions

The following definitions are sourced in part from the Ontario Ministry of Labour and Ontario Human Rights Code and are intended to be applicable in all provinces. Where discrepancies exist, applicable provincial legislation will take precedence:

Personal Harassment is an unsolicited, unwelcome, disrespectful, or offensive behavior and can be typified as:

- Making remarks, jokes or innuendos that demean, ridicule, intimidate, or offend.
- Displaying or circulating offensive pictures or materials in print or electronic form.
- Bullying
- Repeated offensive or intimidating phone calls or emails.

Workplace Sexual Harassment is defined as:

- a) Engaging in a course of vexatious comment or conduct against a worker in a workplace.
- b) Making a sexual solicitation or advance where the person making the solicitation or advance is able to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Racial Harassment/Ethnic Harassment is any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their color, place of birth, citizenship, or ancestry.

Examples of conduct which may be racial or ethnic harassment include:

- Unwelcome remarks, jokes, or innuendos
- Displaying racist or derogatory pictures or other offensive material.

- Insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment.
- Refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

Managing and/or coaching that includes counselling, performance appraisal, work assignment and the implementation of disciplinary actions is NOT a form of harassment or bullying, and the policy does not restrict a supervisor or manager's responsibilities in these areas.

Making a false complaint or providing false information about a complaint is prohibited and a violation of this Policy. Individuals who violate this Policy are subject to disciplinary action in alignment with our Progressive Discipline Policy, up to and including termination of employment.

The Company will not tolerate any form of harassment or discrimination against job candidates and/or employees on any grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as recruitment, training, performance, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

Reporting Discrimination or Harassment

1. Informal Procedure

If you believe you have been harassed or discriminated against, you may:

- Confront the discriminator or harasser in a professional manner, either in person or in writing pointing out the unwelcome behavior and requesting that it stop; or
- Discuss the situation with the discriminator or harasser's supervisor or manager, your supervisor/manager, or any other supervisor or manager that you feel comfortable with.

Any employee who feels discriminated against or harassed can and should, in all confidence and without fear of reprisal, personally report the facts directly to their supervisor/manager, another supervisor or manager with whom they feel safe.

2. Formal Procedure

If you believe you have been personally discriminated against, harassed, or sexually harassed, you may make a written complaint. The complaint must be delivered to Shauna Crosby-Wilkinson, or you may deliver your complaint to another member of the leadership team with whom you feel safe. The complaint should include:

- the approximate date and time of each incident you wish to report,
- the name of the person or persons involved in each incident,
- the name of any person or persons who witnessed each incident,
- a full description of what occurred in each incident.

Investigating a Claim of Harassment or Discrimination

Once a written complaint has been received, the Company will complete a thorough investigation should it be warranted, at the discretion of the Company. Harassment and discrimination will not be ignored. Silence can, and often is, interpreted as acceptance. The Company will do its best to protect from unnecessary disclosure the details of the incident being investigated and the identities of the complaining party and that of the alleged respondent. If it is determined that personal harassment or discrimination has occurred, appropriate disciplinary and / or other corrective measures will be taken in alignment with our Progressive Discipline policy.

The investigation will include:

- Informing the respondent(s) of the complaint.
- Interviewing the complainant, any person involved in the incident, and identifying witnesses at the Company's discretion.
- Interviewing any other person who may have knowledge of the incidents related to the complaint or any other similar incidents at the Company's discretion.
- Providing a summary of complainant's allegations, to the respondent(s).
- The respondent is invited to reply in writing to the complainant's allegations and the reply will be made known to the complainant before the case proceeds further.
- During the investigation, the complainant and the respondent will be interviewed along with any possible witnesses. Statements from all parties involved will be taken and a decision will be made.
- If necessary, the Company may employ outside assistance in the investigation.
- Employees will not be demoted, dismissed, disciplined, or denied a promotion, advancement, or employment opportunities because they rejected sexual advances of another employee or because they lodged a complaint when they honestly believed they were being harassed or discriminated against.
- Where it is determined that discrimination or harassment has occurred, a written report of the remedial action will be given to the employees concerned.
- Any other requirements outlined by applicable provincial legislation.

Disciplinary Measures

If it is determined by the Company, following a reasonable investigation, that any employee has been involved in harassing another employee, contractor, customer, or supplier, immediate disciplinary action will be taken in alignment with our Progressive Discipline policy.

This Policy must never be used to bring fraudulent or malicious complaints against employees. It is important to realize that unfounded / frivolous allegations of personal harassment may cause both the accused person and the Company significant damage. If it is determined by the Company that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action will be taken in alignment with our Progressive Discipline policy.

Confidentiality

The Company will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. The Company will protect this privacy so long as doing so remains consistent with the enforcement of this policy and

adherence to applicable law. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone unless such disclosure is necessary for an investigation or disciplinary action or is required by law.

Health and Safety Policy

Intent

The Company recognizes that safety, accident prevention, and the preservation of health are of primary importance in all the Company's operations and that these activities require the combined efforts of employees and management. The provisions within this policy will supplement any existing Workplace Health and Safety policies, procedures or guidelines that are unique to each employee's work location.

Guidelines

Every employee will take all reasonable precautions and follow all reasonable safety rules, practices, and procedures to protect the employee's safety and health, and the health and safety of any other persons who may be affected by the employee's acts or omissions at work. Mandatory employee participation in key modules will be expected; login information and expected timelines for completion will be given.

When an employee has reason to believe a condition exists that is dangerous to their safety or health in the performance of work, the employee will report that condition to their immediate supervisor / manager or their Health and Safety Representative.

It is in the best interest of everyone to consider health and safety in every activity. The commitment to health and safety must form an integral part of the Company.

The Company has a Safety Representative to assist in providing greater protection against workplace injury, illness and deaths and ensures that everything possible can be done to identify and eliminate or mitigate workplace health and safety hazards.

First Aid Services

First Aid kits are fully equipped to handle minor injuries. The location of the first aid kits will be made known to employees during their orientation to the Company.

Fire Safety

Fire extinguishers are in each workplace. The exact location of the fire extinguishers will be made known to employees during their initial orientation to the Company.

Building Evacuation

All precautions have been taken to prepare for an orderly evacuation of the building in the even of an emergency.

If an evacuation of the building becomes necessary, employees should look around to see that no one has been left behind and preferably exit the building with another person using the "buddy system".

If evacuation becomes necessary while employees are in the lunchroom or away from their workstation, employees will leave through the nearest safe exit and gather in the nearest assembly area.

Employees are to review and become familiar with the floor plans within their work location, which shows designated exits and assembly areas.

When an employee is injured at work, they are required to:

- Report the injury to their immediate supervisor/manager immediately, and if required, obtain first aid.
- If required, see a health care professional, and submit a copy of the certificate of illness or modified duties requirements to your immediate supervisor/manager.
- If time is taken off work related to the injury, cooperate with immediate supervisor/manager to achieve an early and safe return to work.

What to do if a co-worker is injured or ill:

An employee(s) who has qualifications in the case of an injured person should proceed as their training would indicate.

At first indication of possible injury or illness you should consider the following:

- **STOP** all activity immediately at first indication of possible injury or illness.
- **KEEP** all spectators well away from the injured person.
- **LISTEN** to the person's description of the complaint and how the injury occurred. If the injured person is unable to explain, assume the worst and call or have someone else call for emergency assistance #911.
- **EVALUATE** the seriousness of the injury. Look for obvious deformity or other deviation from the person's normal structure or motion.
- **DO NOT MOVE** the victim unless the injuries are of a minor nature.
- **AS SOON** as possible, please contact the Safety Representative. If it is possible, try and record the names of any witness(es). This is very important if there is a need to investigate this accident in the future.

Working Alone

Employees who are working alone while on site are required to notify their immediate supervisor/manager when they commence working alone, and when they have safely exited the building. Immediate supervisor/managers will be responsible for contacting an employee's emergency contacts in the case that they cannot establish contact with an employee who was on-site, working alone. Employees who regularly work alone off-site will make sure their schedules and locations are readily available in the case that their supervisor/manager cannot get ahold of them. Employees will exercise the use of common sense and good judgment before attending work-related meetings unaccompanied.

News Media Guidelines

Intent

This guideline was established to describe the Company's position with respect to interacting with news media representatives and responding to media requests for information or interviews. It is intended to provide all employees of the Company with an understanding of their individual

responsibilities when it comes to dealing with the media and all the Company's public communication on business matters.

Guidelines

Spokespersons

To provide clear and concise communications, all media inquiries should be channeled through the Marketing Coordinator. Unless given permission or requested by management, employees are not authorized to speak on behalf of the Company or represent that you do so to the news media. The CEO's permission must be received to speak directly to the media.

The CEO is deemed to be the chief and primary spokesperson of the Company, however, may designate other spokespersons at their discretion. Unless given permission or requested by management, employees are not authorized to speak on behalf of the Company or represent that you do so to news media. The CEO's permission must be received to speak directly to media.

Interview and Information Requests

As a rule, if an interview, comment, or information is requested by a news reporter, employees will politely and cooperatively direct the request/inquiry to the most senior person present and provide the appropriate contact information. Management must then be immediately notified that a media interview or inquiry has been requested.

Those designated to grant media interviews must use their upmost diligence to respond to requests immediately (usually within 15 minutes of contact).

Employees can only be interviewed at the discretion of the CEO and with family approval whenever applicable (i.e., under-age employees).

Reporting and Delegation

All issues or incidents which have the potential to attract the attention of the media, or any media inquiries are to be referred immediately to the employee's immediate supervisor / manager. The immediate supervisor / manager will then make the Marketing Coordinator/CEO aware of the situation as soon as possible. A designated spokesperson will then prepare and deliver a response.

If an employee who is not authorized to speak on behalf of the business has valuable information that could benefit the business and public, they are advised to notify management immediately.

Source of Detailed Information

Usually, the details of an issue or incident are not readily or immediately available to a designated spokesperson. All parties who are touched by the issue are accountable for gathering information for the spokesperson.

Approval to be on Community Property

Reporters and cameras are not permitted on any of the Company's properties without Marketing Coordinator approval.

Outside Employment

Intent

The Company supports their employees in opportunities for additional employment where possible. This policy provides guidelines for employees who are seeking additional employment outside of the Company.

Guidelines

All full - time employees of the Company should view the Company as their main employer.

If employees choose to take on additional employment, the following applies:

- Employees may not take a second job with a business in the same or related business as the Company, or which is in any way a competitor of the Company without express consent from the Company.
- A second job must not interfere with the employee's ability to perform their job with the Company. Absenteeism / tardiness is not excused by the demands of the second job.
- The Company's work assignments and schedules will not be changed to accommodate a second job.
- Employees may not use their working time with the Company, or the Company's equipment, for business related to the second job.
- Employees may not disclose any confidential or proprietary information of the Company while working at the second job.

Privacy of Confidential Information

Intent

The Company is committed to protecting and preserving the privacy of personal information of its staff. In addition, there are numerous corporate interests that the Company intends to safeguard and keep confidential. We strive to protect and respect the personal information of customers, employees, and business partners in accordance with all applicable provincial and federal laws.

Guidelines

By continuing employment with the Company, employees agree that they will not disclose or use any of the Company's confidential information, either during or after their employment. We sincerely hope that our relationship with employees will be long - term and mutually rewarding; however, employment with the Company assumes an obligation to maintain confidentiality, even after an employee leaves the employment of the Company. See the Confidentiality policy for further related information.

All personal information at the Company will be collected, stored, and used in conjunction with all appropriate privacy legislation. All personal information, (for employees and customers), will be:

- Collected with consent and for a reasonable purpose.
- Used and disclosed for the limited purposes for which it was collected.

- Accurate
- Accessible for appropriate inspection and correction
- Stored securely.

Employee Information

Personal information means any identifying information about an individual or group of individuals, including but not limited to name, date of birth, address, phone number, e-mail address, social insurance / security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, payment records, credit records, and loan records.

The Company aims to protect employees' personal information with the appropriate security measures, physical safeguards, and electronic precautions. The Company will maintain personal information primarily through electronic files.

Access to personal information will be authorized only for the employees who require the information to perform their job duties, and to those otherwise authorized by law.

Customer Information

Confidential information means information that is by its nature confidential; is marked as confidential; or is known to be confidential, or which an employee ought to know is confidential. Examples include but are not limited to client lists, prospect lists, price lists, designs, reports, plans, systems, structures, trademarks, trade secrets, or financial information of our customers.

The following are guidelines in which employees are expected to follow when handling confidential customer information:

- Only employees with a legitimate business need will be given access to confidential material.
- Customer documentation will not be altered without proper consent.
- Employees entrusted with or knowledgeable about information of a confidential or proprietary nature shall not divulge, disclose, provide, or disseminate confidential information at any time, either during or after employment.
- Confidential Information shall not be used for any purpose other than its reasonable use in the normal course of employment duties for the Company.

On the employee's last day of employment with the Company, they shall promptly return (without duplicating or summarizing), any and all materials pertaining to the Company business in their possession including, but not limited to: all client information (see Confidentiality policy), physical property (including cell phones or equivalent, laptops, Company vehicles, tool, keys, electronic storage media), manuals, and reports. Employees must refrain from disclosing, copying, and reproducing or making any use of confidential information pertaining to the Company or any of its clients, suppliers, or employees which was acquired during employment.

If you have any questions, concerns, or complaints regarding compliance with our Privacy of Confidential Information policy or if you wish to withdraw your personal information, please contact your supervisor / manager.

Probation Period

At minimum, the first three (3) months of employment with the Company will be considered a probation period. The probation period is an opportunity for employees to receive on-the-job training, and additional support from their immediate supervisor / manager to learn the responsibilities of their position. During this time, the immediate supervisor / manager will assess an employee's ability to meet the expectations of their position. The employee must demonstrate skills, abilities, quality of work and a positive attitude towards their position, people, and the work environment.

Security & Loss Prevention

It is every employee's responsibility to help maintain the security of both the business's property and that of the employees. All employees must make security a habit.

Building Doors and Alarms

All building entry / exit doors are to be kept locked during non-business hours. At the end of the business day the last employee leaving the office assumes the responsibility for ensuring that all doors are securely locked, and alarms are armed.

Any employees who will be staying at the office beyond normal business hours must let their immediate supervisor / manager know they are in the office for safety reasons.

Building Break - Ins

In the event an employee suspects the building has been broken into, they are to leave the premises right away and call the local authorities. Employees must not jeopardize their Health and Safety at any time. Not under any circumstances will any employee enter / re-enter the building for any reason until trained local authorities have advised it is safe to return.

Employee Personal Belongings and Property

Personal items kept on the Company property should be carefully safeguarded. The Company is not responsible for personal belongings or property. Purses, wallets, and any other valuables should not be left unattended. Any security concerns must be reported to your immediate supervisor / manager immediately.

Social Media Policy

Intent

The Company recognizes the importance and significance that social media has within the everyday lives of employees. This policy is designed to ensure that the Company's image and branding are responsibly maintained while using or accessing social media. This policy is not intended to interfere with the private lives of the Company employees or impose on their right to freedom of speech.

Guidelines

Employees are encouraged to share information about the Company within their social networking groups to create a positive impact on the business. Employees who maintain personal social media

pages or accounts are reminded of the following guidelines as they relate to their association with the Company. Employees should follow the guidelines below when making posts or comments on any social media site whether it is public or private.

- Employees are expected to conduct themselves professionally both on and off duty. Where an employee publicly associates with the business, all materials associated with their page may reflect the business. Employees should be advised that inappropriate comments, photographs, links, etc. are not acceptable.
- Posts involving the following will not be tolerated and will subject the individual to progressive discipline:
 - a) Proprietary and confidential business information.
 - b) Discriminatory statements or sexual innuendos regarding co-workers, management, clients, or industry partners.
 - c) Defamatory statements regarding the business, its employees, clients, or industry partners; or
 - d) Inflammatory comments, unprofessional remarks or disparaging remarks made about the business, its employees, clients, industry partners or competitors.
- Employees who use these sites are prohibited from disseminating any private business information therein, or any negative comments regarding the business.
- The Company's employees are prohibited from speaking on behalf of the business, releasing confidential information, releasing news, or communicating as a representative of the business without prior authorization to act as a designated the Company representative.
- Use of personal social media may not conflict with any of the business's existing policies whatsoever.
- Employees are prohibited from using personal social media during regular working hours, employees should limit its use to official breaks (i.e., meal breaks). The use of social media should not have a negative impact on user productivity or efficiency.
- Policies governing the use of copyright materials, logos and other forms of branding and identity apply to electronic communications. Employees are prohibited from using the Company protected materials (copyright material, branding and / or logo(s)) without prior expressed written permission.
- The Company prohibits the use of business owned computer resources for use in the illegal download or upload of copyright materials without express written permission, and authorization from the copyright holder.

Employees should abide by these guidelines whether they mention the business by name or not. Even if the name is not mentioned in a post, it is possible a link can be made back to the business which can negatively affect the business's reputation. Where a link can be made between a negative or inflammatory post and the business, even if not named directly, the employee may be subject to disciplinary action in alignment with our Progressive Discipline policy.

Visitors and Clients

Employees should also be aware that many clients and people present on business property frequently use mobile phones and other devices to take photographs or recordings. Employees should always represent the business in a positive and professional manner so negative images are posted on social media sites of clients or visitors. Employees who are photographed or recorded acting inappropriately or unprofessionally may be subject to disciplinary action in alignment with our Progressive Discipline policy.

Violence in the Workplace

Intent

This policy applies to all employees, customers, contractors, suppliers, and the public at the Company.

The Company is committed to building and preserving a safe working environment for its employees. In pursuit of this goal, the Company does not condone and will not tolerate acts of violence against or by any Company employee. The Company will take every reasonable precaution and implement measures to prevent violence and protect all employees from potentially violent situations. As such, this policy prohibits physical or verbal threats – with or without the use of weapons – intimidation, or violence in the workplace to minimize risk of injury or harm to the Company’s employees, customers, contractors, suppliers, and employees of the public. We are committed to providing a safe and healthy work environment free from violence, threats of violence, harassment, intimidation, and disruptive behavior for all our employees. Weapons are strictly prohibited from all Company property; violators are subject to discipline and may be reported directly to the police.

Guidelines

If the Company is aware that domestic violence is likely to expose any employee to a workplace physical injury, every reasonable precaution will be implemented to protect the individual. It is a violation of this policy for anyone to knowingly make a false complaint of violence, or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary action in alignment with our Progressive Discipline policy, up to and including termination of employment. If an employee is either directly affected by or is witness to any violence in the workplace, it is imperative for the safety of all Company employees that the incident be reported without delay.

- report any violence or potentially violent situations immediately to the supervisor /manager, or to another member of the leadership team with whom you feel safe.
- All reports shall be kept confidential to the best of the Company’s ability,
- All reports shall be investigated, and dealt with appropriately,
- Any employee who threatens, harasses, or abuses another employee, or any other individual at or from the workplace shall be subject to disciplinary, up to and including termination of employment, and the pursuit of legal action where appropriate.

This policy prohibits reprisals against individuals, acting in good faith, who report incidents of workplace violence or act as witnesses. Management will take all reasonable and practical measures to prevent reprisals, threats of reprisals, or further violence. Reprisal is defined as any act of retaliation, either direct or indirect.

Workplace Bullying is an act, physical contact, or comments which have the effect of mentally / psychologically hurting or isolating a person in a workplace. Workplace bullying usually consists of repeated incidents or a pattern of behavior that is intended to intimidate, offend, belittle, or humiliate a particular person or group of people. Many bullies attempt to assert some type of power over their victims through inappropriate aggression, and therefore may or may not be in a

position of formal authority over their victims.

Workplace bullying (otherwise known as “psychological harassment”) includes, but is not limited to, the following types of conduct:

- Character assassination: spreading rumors, gossip, and innuendo, especially that which is malicious, hurtful, and untrue.
- Social isolation: ostracizing or purposely ignoring an individual.
- Violence, intimidation, or threats of violence.
- Deliberately undermining someone.
- Belittling an employee’s work or achievements or constantly taking credit for that person’s accomplishments; removing responsibilities and accountabilities without reason.
- Assigning unreasonable duties or workload to an employee; assigning demeaning and / or insulting work, etc.

Workplace Violence means, but is not limited to:

- The exercise of physical force by a person against an employee, in a workplace, that causes or could cause physical injury to the employee.
- An attempt to exercise physical force against an employee, in a workplace, that causes or could cause physical injury to the employee.
- A statement or behavior that is reasonable for an employee to interpret as a threat to exercise physical force against an employee, in a workplace or elsewhere that causes or could cause physical injury to the employee.
- Physical acts (e.g., hitting, shoving, pushing, kicking, sexual assault).
- Any threat, behavior or action which is interpreted as carrying the potential to harm or endanger the safety of others, results in an act of aggression, or destroys or damages property.
- Disruptive behavior that is not appropriate to the work environment (e.g., yelling, swearing).

Risk Assessment

The Company will conduct a risk assessment of the work environment on an annual / as needed basis to identify any issues related to potential violence that may impact the operation and will institute measures to control any identified risks to employee safety. Specific areas that may contribute to the risk of violence may include contact with public exchange of money, working alone or at night etc. Research may also include a review of similar workplaces with respect to their history of violence.

Communicating a Risk of Violence

The Company will communicate information relating to a person with a history of violence where:

- Employees may reasonably be expected to meet the person in the performance of their job duties; and
- There is a potential risk of workplace violence because of interactions with the person with a history of violence.

The Company will only disclose such information to those people who need to know and will only disclose personal information that is deemed reasonably necessary to protect employees,

customers, contractors, suppliers, and the general public from the potential of physical harm.

In the case of domestic violence, when the Company is aware of or suspects actual or potential violence from an employee's current or former spouse and the consequence of that violence is likely to interfere with the workplace, the Company acknowledges that it has an obligation to intervene. The Company will:

- Take measures to protect the Company's employee from their current or former spouse while they are at work,
- Protect all other employees working at the Company from acts of domestic violence occurring at the workplace,
- Communicate information relating to the identity of the person with a history of violence.

At all times, the Company will be respectful of personal and sensitive information; thus, only the information needed to protect the Company's employees will be shared, and the information will only be communicated to those who need to know to protect themselves.

Work Refusal

Employees have the right to refuse work if they have a reasonably founded belief that they are in danger from workplace violence. No reprisals will be taken against any employee who acts in compliance with, or seeks protection under, the provisions of applicable provincial health and safety legislation.

Work Remotely

Intent

The Company generally requires staff to work in the Company's office location, to mentor, collaborate, and provide back-up client support. However, from time to time, it may be necessary and/or provide a mutually beneficial option for the employee to work remotely, either from a home or alternative office location. Team members that are in the office on a full schedule may request work remotely to a maximum of 10 calendar days per year. Any arrangement must be approved in advance by your supervisor / manager. Farm Lending Canada values everyone's time and specifically the in-person time we can spend with each other to continue to develop our business as well as each other. As part of our focus on promoting in-office value, we will reward team members at year end for unused remote workdays. Eligible team members will receive \$50 per day of any unused work at home days; to a maximum of \$500 gift card to be awarded before Christmas break. Any days more than the 10 must be taken as either sick days or vacation time.

For Hybrid team members in office attendance is also extremely important. It should be a time to focus on team tasks, coaching/mentoring, and development. In this effort, as part of the hybrid model it is expected that team members are to be in the office a minimum of 3 days per week. If your regularly scheduled day off is to fall on a holiday, for example Monday or Friday you are still expected to be in the office 3 days that week and would have to adjust your schedule accordingly with approval from your direct supervisor/manager.

Guidelines

The following guidelines must be followed when an employee works offsite:

Preapproval Required

- Permission to work from home is subject to prior approval and immediate approval the morning of prior to entering in HUMI; along with ongoing review by the employee’s manager.
- The employee remains obligated to comply with all Company rules, policies, practices, and instructions that would apply if the employee were working at the regular Company worksite.

Eligibility

Each position has different job-specific requirements, client or stakeholder needs, collaboration, and team-based activities. These differences are key considerations when making decisions about whether a given staff member is eligible for remote work.

In evaluating whether a particular position is suitable for remote work, the Company will consider many factors including, but not limited to:

- (a) Whether the nature of the work to be performed remotely is operationally feasible.
- (b) Whether the position has tasks that are portable and can be performed from a remote location.
- (c) Whether the overall quantity and quality of work performed can be sustained at the remote location.
- (d) If the position is a managerial one, whether an employee in the position has the tools and resources to effectively manage direct reports remotely.
- (e) Whether collaboration and mentoring required by the position is easily accomplished through teleconference or other remote technologies.

The following guidelines must be followed when an employee works offsite:

- Changes to work schedule should be requested through the “Humi” app and changes to regular working days/hours are to be discussed with a manager in advance as it is for mutual benefit.
- The employee remains obligated to comply with the Company rules, policies, practices, and instructions that would apply if the employee were working at the regular Company website and must adhere to security and compliance requirements.
- Preference is to have no paper files at home. For Customer privacy purposes, no customer information should be printed outside the office. If there are paper files at home, they must be safely secured as well as delivered to head office for destruction at month end.
- Lockable cabinets and a clean desk environment are required, in a manner that no one can see.
- No printer connectivity unless approved.
- Secured WIFI
- All work is to be completed from a company issued computer. External agents, consultants, and contractors are required to have FLC approved security on their computers.
- More detailed requirements can be found in Section 28 of the new Compliance Manual.

While working remotely, employees must:

- (a) Be able to carry out the same duties, assignments, and other work obligations at the remote location as they do when working on the Company’s premises.
- (b) Dedicate their full attention to their job duties during working hours.
- (c) Adhere to all meal and rest breaks and hours of work/attendance schedules agreed upon with their manager.
- (d) Ensure their schedules overlap with those of their team members for as long as is necessary to complete their job duties effectively.
- (e) Be available to their supervisor/manager and co-workers during agreed-upon work hours and make their availability clear.

Employees need to ensure that they can be reached by telephone (office, home, mobile) and messaging (e.g. e-mail, text, Microsoft Teams, etc.). The Company expects the same level of professionalism and responsiveness from its remote employees as it would from employees working at the office.

Employees who are working remotely are expected to comply with the same Company policies that apply to office-based staff. Such policies cover absenteeism, hours of work, overtime, employee privacy, social media, computer, email and Internet use, code of conduct, workplace harassment, health and safety, dress code, leaves of absence and more.

Remote work cannot be a substitute for ongoing family care needs. In an emergency, remote work may occur while dependents are present if school or childcare is closed and alternative care is unavailable, or senior care is unavailable, under the following guidelines:

(a) The Company is not responsible or liable for the health and safety of employees' dependents while employees are working remotely, or for employees' health and safety while they are delivering care to their dependents. It is up to employees to determine whether work can be conducted safely.

(b) If a dependent is ill and/or requires ongoing attention, employees may take personal time away from work as per the Time Away from Work – Personal Time policy, as needed. In light of a declared pandemic or public emergency, the above noted policies may be relaxed to allow for the care of healthy children at home due to school or childcare closures. Employees may also be covered under declared emergency leave and any provincial or federal program implemented at that time.

(c) Employees are expected to determine what they can reasonably accomplish while dependents are under their care (whether healthy or ill), and the amount of time they expect to be able to work. Employees must discuss such issues as soon as possible with their supervisor/manager and make the appropriate arrangements. Any arrangement must be documented.

Safety

- The employee and the employer agree to work together to ensure that the alternate worksite is safe and ergonomically suitable.
- The employee will be covered by workers' compensation for job-related injuries that occur in the course and scope of employment while working from home. The employee remains liable for injuries to third parties and/or members of the employee's family on the employee's premises.
- Representatives of the Company may make on-site visits to the employee's work site, at a mutually agreed upon time, to ensure that the designated workspace:
 - is safe and free from hazards.
 - that the worksite is designed in a way that maintains confidentiality; and
 - to maintain, prepare, inspect, or retrieve Company-owned equipment, software, supplies and furniture.

Data and Property Security

- The employee agrees to follow Cyber Security protocols as outlined in the Company's Cyber Security Policy, and to take reasonable steps to protect Company property from theft, damage, or misuse. Depending on the circumstances, the employee may be responsible for any damage to or loss of Company property. The Company retains control over the property and reserves the right to monitor said property even when used at a remote location.
- The employee agrees to maintain data security and record confidentiality to at least the same degree as when working at the regular Company worksite.

- The Company requires that any systems that houses confidential information be used solely for business purposes. If this is not possible the employee must take all reasonable steps to ensure that Company information is inaccessible to anyone who is not an employee of the Company, including family members.
- All devices utilized for Company use outside our standard office setting must be equipped with appropriate security functions.
- The employee may not duplicate Company - owned software and will comply with the licensing agreements for use of all software owned by the Company.
- The employee agrees to save all completed and working copies of their documents on the Company's online system.
- The employees' work area must be in a private location to ensure confidentiality.
- All file hardcopies must be in a cabinet which can be locked or in a secure room and must adhere to all documents handling legislation.
- Employees must take proper measures to secure Company information, assets and systems. Specifically, employees must:
 - (i) Keep equipment password protected.
 - (ii) Store equipment in a safe, secured, and clean space when not in use;
 - (iii) Follow all data encryption, protection standards and settings;
 - (iv) Refrain from visiting untrustworthy or suspicious sites;
 - (v) Download only authorized software with prior approval; and
 - (vi) Keep confidential information in locked file cabinets and desks.
- The employee agrees to return, in good working order and in a timely fashion, all Company-owned items used at the alternate worksite upon request or if the working from home agreement is discontinued for any reason.

Please keep in mind that approved offsite work arrangements may be revoked at any time, at the discretion of the employer.

Any employee who violates the terms of this policy may have their offsite work arrangements revoked.

Compensation & Benefits

Intent

The Company strives to be a leader in competitive compensation and benefits for their employees. Decisions made regarding fair compensation practices are made with market competitiveness, equity, and employee engagement in mind. Supporting employee and family health and wellbeing is one of the Company's priorities; as such, this policy outlines important information related to the Company's total compensation package. Compensation, dependent on position held and depth of prior experience, can take on many forms and may include any one of or a combination of the components below:

Hourly: is the fixed amount employees earn per hour.

Salary: is a fixed amount that is paid to employees regularly by an employer as wages, worked out on an annual basis, not hourly.

Base Salary: is a base salary rate is dependent on certain variables, such as personal sales targets.

Variable Rate Incentive Compensation: all team members are an integral part of Farm Lending Canada’s financial success. This variable rate incentive was established to unite the goals of the team toward a targeted outcome. The current 20% potential Company Based performance incentive may be earned annually with payments prorated and issued quarterly. The quarterly potential payment schedule is as follows; 2.5% (Q1 April) / 2.5% (Q2 July) / 2.5% (Q3 October) / 7.5%+5% (Q4 February). The percentage of the potential earned will be based on the Gross Revenue for Farm Lending Canada for 2024. 10% earned for \$5M Rev / 12.5% earned for \$6.5M Rev / 15% earned for \$8M Rev. The additional 5% is a program that we have introduced to encourage team members to save and invest for their future goals. This program is a Company match up to 5% (increased with tenure, 7.5% after 5 years, 10% after 10 years) of a team members wage if invested into an RRSP or TFSA with AgriRoots Diversified Lending Trust. When a new team member joins, they are eligible for the incentive for the first full quarter following their start date.

For greater clarity, for 2024, the cumulative quarter end revenue goals of which the incentive pay will be based are:

	\$5M	\$6.5M	\$8M
Q1	1.67% - \$575K	2.08% - \$750K	2.5% - \$900
Q2	1.67% - \$2.1M	2.08% - \$2.74M	2.5% - \$3.3M
Q3	1.67% - \$3.6M	2.08% - \$4.7M	2.5% - \$5.7M
Q4	5.00% - \$5M	6.25% - \$6.5M	7.5% - \$8M

Individuals wishing to invest on a quarterly basis to save for the company match have the availability to do so.

Commissions: amount earned per transaction, at a certain agreed amount individual percentage of revenue, as agreed in a contract or employment agreement.

Employee Health Benefits

Employees will be enrolled in the Company’s mandatory Group Health Benefits upon hire.

Eligibility requirements are as follows:

- Permanent employees working a minimum of twenty (20) hours per week.
- Continuous employment for a duration of three (3) months (completion of the introductory period).

Please review the Group Benefit booklet for detailed information about health coverage or speak directly with the Director of Human Resources. The Company commits to reviewing the Benefit Policy Plan regularly to ensure the plan is in line with demographics and market trends. We will communicate any changes or updates related to the benefits plan to eligible employees. We are committed to ensuring employee and benefit information is maintained in a confidential manner,

in compliance with privacy information legislation.

Overtime

The Company recognizes there will be times when employees may be required to work beyond their standard weekly working hours to meet business needs and deadlines. All overtime hours must be pre-approved or assigned by the employee's immediate supervisor / manager in advance of overtime hours worked. The Company will follow all legislative overtime requirements within the operating province.

Time Away from Work

Leaves of Absence

Intent

The Company shall provide the following program to assist employees who are absent from the workplace for an approved reason. A leave of absence, with or without pay, may be granted subject to the business requirements of the Company.

Guidelines

It is the employee's responsibility to request a leave of absence from his / her manager providing as much notice as possible to ensure successful continuity of business operations and the ability to respond positively to the request for leave.

Employees may be eligible for various job protected leaves of absence provisions provided within the applicable provincial employment standards in your province of work.

Bereavement Leave

In the event of a death in an employee's immediate family, the Company will allow Full-time Permanent employees up to a maximum of three (3) paid days leave to allow the employee time for grieving and attending funeral services (Part-time permanent employees will receive pro-rated paid time off). Immediate family for this policy includes:

- Spouse, including same-sex or common law partner
- Parents, step-parents, parents-in-law
- Children (including adoptive, foster, step-children, and children-in-law)
- Daughters- and sons-in-law
- Grandparents, grandchildren
- Brother/Sister

The Company will allow Fulltime Permanent employees up to a maximum of 1 day paid leave for bereavement purposes for the following persons (Part-time Permanent employees will receive up to one half day paid leave):

- Aunts, uncles, nieces, nephews, cousins, close family friends

Management may in its sole discretion authorize time off in the event of the death of other relatives or close friends.

In situations requiring extended time off or extended travel, management may authorize a combination of bereavement leave, vacation and /or an unpaid leave of absence. Employees should advise their manager as soon as possible of their need to take bereavement leave.

Where appropriate, approved time off from work as outlined within this policy will be included in, and not in addition to, employee entitlements to personal days, sick days, bereavement days, and other related provisions under the applicable provincial employment standards.

Jury or Witness Duty

The Company recognizes and respects the necessary civic responsibility of Jury or Witness Duty and shall make accommodation where possible for employees to receive unpaid leave from work to fulfill their civic duties. The Company will allow employees to use their unused vacation time during Jury or Witness duty upon manager approval. If the related court session ends early during the workday, it is the Company's expectation that the employee will return to work for the remainder of the work-day. It is the employee's responsibility to provide proof of the period served as a juror.

Unpaid Personal Leave

The Company recognizes that there may be times when an employee wishes to take a leave that does not fall into the categories listed above. In these situations, the employee should discuss the reasons for the request with their manager. In most cases, and at the discretion of the Company, these leaves will be unpaid, and the employee's job will not be protected. Consideration of each request will be given on a case - by - case basis and the decision to grant such a leave will be within the Company's sole discretion.

Religious Holidays

The Company supports employees who may have other religious or non-religious holidays that they recognize. Employees wanting to take time off for these days must make the request in writing for approval to their immediate supervisor / manager at least 2 weeks in advance of the actual day. If approved, employees will be given the option of using annual vacation day(s), personal time, banked time (if applicable), or taking leave without pay to accommodate the

Paid Statutory Holidays

The Company honors all provincially regulated statutory holidays, as outlined in applicable Employment Standards Legislation. In addition, the Company works to recognize the December holiday period each year as business needs permit.

Holiday Calendar 2024 – 2025

	Statutory Holiday	Date Recognized in 2024	Date Recognized in 2025
1	New Year's Day January 1	Monday, January 1	Wednesday, January 1
2	ON Family Day Third Monday in February	Monday, February 19	Monday, February 17
3	Good Friday Friday before Easter Sunday	Friday, March 29	Friday, April 18
4	Victoria Day Monday before May 25	Monday, May 20	Monday, May 19
5	Canada Day July 1	Monday, July 1	Tuesday, July 1
6	Civic Holiday** First Monday in August	Monday, August 5	Monday, August 4
7	Labour Day First Monday in September	Monday, September 2	Monday, September 1
8	Thanksgiving Second Monday in October	Monday, October 14	Monday, October 13
9	Christmas Day December 25	Wednesday, December 25	Thursday, December 25
10	Boxing Day December 26	Thursday, December 26	Friday, December 26

**Not a provincial holiday in Ontario, granted as a paid holiday by the Company.

The **December holiday period** will be reviewed year to year. Some days away from work may be granted, depending on industry standards, when all client needs are met. For example, if a mortgage is closing, the documents must be completed. If a client or investor calls with time-sensitive requests, that call must be answered. If no urgent/time-sensitive work arises, then the time may be taken away from work.

Guidelines

- All statutory holidays recognized by legislation as general holidays will be a day off with pay or, employees who work on the statutory holiday will be paid according to provincial legislation.
- These holidays must be taken on the day they land. However, when a statutory holiday falls on a regular rest day, that an employee does not normally work, the employee will receive the next regular workday off with general holiday pay.
- All full-time employees who consistently work the same number of hours per week will receive their regular pay for general holidays.

- All part-time employees, whose hours of work or wages vary, will have the same entitlement to a paid holiday as full-time employees. Holiday pay for part-time employees is prorated to the number of hours they work.

absence.

Personal / Emergency Leave

Intent

The Company is committed to supporting employee health and wellness. This policy outlines how and when employees can use their paid Personal / Emergency Leave.

Guidelines

The Company provides up to a maximum of three (3) sick days and three (3) family responsibility days for a total of six (6) paid personal days to eligible employees each calendar year, if these are exhausted the employee must use vacation time,

Eligibility

- All permanent employees are eligible for paid Personal / Emergency Leave once they have successfully completed their introductory period.
- From time-to-time, at the discretion of the Company, temporary or term employees will be made eligible.

General Guidelines

Personal days can be used by employees to:

- a) Take time to recuperate from an illness.
 - b) Attend personal appointments that must be scheduled during regular working hours.
 - c) Care for ill family members.
 - d) Support mental health and wellness
 - e) Other personal reasons as approved by immediate supervisor/manager.
- All requests for personal time usage should be made in Humi with as much notice as possible.
 - Personal time can be requested and used in increments of half-days, or full days.
 - Unused personal days are not cumulative and cannot be carried forward, into the next year.
 - In circumstances where an employee leaves the Company either voluntarily or non-voluntary, unused personal days will not be eligible for payout at the time of employment termination.
 - In situations when an employee requires more time off after exhausting their paid personal time, vacation time as well as any pre-approved banked time can also be used and applied against the absence. If the employee has no other paid time available to them, the absence will be unpaid.

Reporting an Absence from Work:

- If an employee is absent from work for any reason, they must notify their immediate supervisor/manager via Humi (hr.humi.ca) and phone or text at minimum one (1) hour before the start of their shift. If their immediate supervisor/manager does not provide confirmation, contact Human Resources.
- Employees will also be required to input their request into Humi on the first day of their absence and every day, thereafter, that they are away from work.

Return to Work

Intent

The goal of our return-to-work program is to keep employees on the job and facilitate the earliest possible (and medically supported) return to work of employees who are absent due to disability, injury, or other similar reasons. This may include reduced hours and/or light duties or other accommodations while employees work their way back to improved health. In developing a return-to-work plan with the employee and medical practitioner (if applicable), the Company reserves the right to approve or disapprove return-to-work plans in accordance with the needs of the Company.

Guidelines

Employee Responsibilities

Report immediately any work or non-work-related injury, illness, pending medical absence or disability that may impact your ability to work.

Employees suffering from injury or illness must cooperate fully by seeking appropriate care, providing necessary documentation to the Company when requested, participating in ongoing communication, and being actively involved in their return-to-work plan. Failure to do so may lead to disciplinary action in alignment with the Progressive Discipline Policy.

At the discretion of the Company, and in alignment with applicable legislation, employees returning to work from absences due to illness or injury will be required to submit suitable medical documentation to indicate they are able to safely return to work before being permitted to return. Employees who do not return to work as expected on the date their return-to-work program is scheduled to begin may be deemed to have abandoned their position.

Vacation

Intent

Employees are encouraged to use their accrued paid vacation time for rest, relaxation, and personal pursuits. The purpose of this policy is to explain the standards, guidelines, and procedures for paid vacation time for all eligible employees.

Guidelines

Employees begin accruing (earning) vacation from their first day of work. Vacation entitlements are part of the employee's remuneration package. The company will allow unused vacation days to be carried over and used within the first quarter of the new calendar year.

The Company's vacation year is from January 1st to December 31st.

Vacation Time and Pay

- Vacation is accrued (earned) at the following rates:
- 2 weeks (4%) after 1 complete year of service.
- 3 weeks (6%) after 5 complete years of service.

- Employees are eligible to use vacation time after completion of the Introductory period.
- Vacation entitlement will be prorated during the first year of employment, based on the time worked.
- The Company will follow all legislative requirements regarding vacation pay, including paying employees for all remaining vacation upon termination of employment.

Vacation Scheduling

- Approval or denial of vacation requests will be made based on business requirements. Best efforts will be made to ensure a mutual agreement and arrangement can be made.
- Employees are responsible for entering their vacation request into the Humi HRIS and confirming the annual entitlement reflected therein is accurate. Supervisors / managers are responsible for approving vacation requests.
- If the Company and employee cannot agree on when the vacation will be taken, the Company reserves the right to set the vacation date. In these circumstances, the employee will be given reasonable notice. However, employees are encouraged to plan out their vacations accordingly to dates and times that best suits both their own, and business' needs.
- The Company is a client service - oriented business. All employees are responsible for ensuring that client needs are planned for prior to scheduled vacation.

Working While on Vacation

Employees are not expected to work while on their vacation. The Company will only contact an employee during their vacation in the event of an urgent / critical matter with the purpose of asking a quick and simple question that requires no work. In the event the matter requires more than a quick answer, the employee would be compensated for the time spent doing any work and will be credited vacation time.

At the end of employment, any vacation earned but not yet taken will be paid on the last scheduled pay period. Alternatively, employees who have taken more vacation than they have accrued as of their last day will have the unearned portion of vacation pay deducted from their final pay. Vacation pay owed to the employee or to the Company will be calculated at the salary rate in effect at the date of termination.

Talent Management

Intent

The Company is committed to supporting employees to be successful within their roles. The Company encourages employees to pursue lifelong learning and seek additional education related to their position. We recognize that employee training and development is of mutual benefit to the individual employee and to the Company, by enhancing employee satisfaction and performance while contributing to overall business effectiveness. The following policy outlines how the Company contributes to a high-performance culture and supports employees with continuous learning initiatives.

Employee Orientation

The Company provides an orientation for all new employees once they begin work. The orientation process will introduce employees to the business, the goals and objectives of the

business, and the Company's policies, procedures, and guidelines of the workplace. New employee orientations also provide an opportunity to be introduced to the team and to job responsibilities and will ensure new employees are provided with all the important information they need to know to be successful in their new roles.

On - the - Job Training

The Company offers on - the - job training to all employees. Employees will be provided with more information regarding training during their orientation. The Company reserves the right to assign mandatory training when that training is directly relevant to a specific position, or a condition of employment with the Company.

Professional Development

The Company will endeavor to provide training in areas that are relevant to the business; at the discretion of their direct supervisor / manager, employees may be able to attend conferences, courses, seminars, and meetings, identified as beneficial to their position at the Company. All training must be relevant to an employee's current position, or the potential of a future position within the Company and must be business related.

Employees should bring forward professional development opportunities that they feel would be beneficial to the Company to their direct supervisor / manager for review and approval.

Reimbursement and Employee Pay

The Company will cover costs related to approved professional development opportunities, as reasonably discussed prior to attending. If the Company has agreed to pay for a professional development opportunity, the fees will be paid on evidence of successful completion. If the employee ends employment with the Company for any reason within a year of completion of Company sponsored education, all associated fees will be repayable to the Company in full.

If an employee voluntarily attends training courses to upgrade or increase job related skills in their own personal time, there must be no cost to the Company, unless it has been approved in advance by an immediate supervisor / manager. The Company also may require you to be a licensed professional to complete the duties as part of your employment. These would include Mortgage Agent/Broker, EMD, AML Certification, etc. Although in most cases the Company pays the fees associated with your education and licensing, these Licenses belong to the team member personally. As such, it is expected that the time spent on training is your personal time.

When attending training, employees will be compensated for their normal regular working hours during the work week. Overtime will not be paid unless the length of the training per day surpasses normal hours of work. Overtime is subject to supervisor / manager approval, as per the Company's Overtime Policy.

Knowledge Sharing

When employees attend training or other educational opportunities, they may be asked to prepare a presentation about what they learned to pass on this knowledge. This is in keeping with the commitment to continuous learning and to maximize the benefit of the professional development opportunity.

Performance Process

The Company has high expectations of their employees and expects them to perform accordingly based on their experience, qualifications, and knowledge of their position. Every employee has talent, skills and knowledge that can contribute to the success of the business.

Each employee has a right to know how they are performing, where their strengths are, and what areas of performance need to be improved. The Company sees the evaluation of employees as an ongoing process that includes regular meetings between employees and their direct supervisor / manager, informal observation, and ongoing feedback. Employees will receive a performance review from their immediate supervisor / manager following successful completion of their introductory period, and quarterly thereafter.

The purposes of the evaluation include: to provide coaching and development, to monitor performance according to the job description, recognize accomplishments, identify areas for improvement and review and to revise the job description, if necessary.

Progressive Discipline

Intent

All the Company's employees are expected to display professional and courteous behavior while at work and when representing the Company outside regular work hours. There may be times where an employee's performance is unsatisfactory or the employee has committed an act of misconduct and as a result, a review of their ongoing employment is required. The Company is committed to supporting employees to overcome performance concerns with the Progressive Discipline Process.

The following policy and procedures have not been put in place to restrict the freedoms of employees, but instead are in consideration of employee safety, and the overall protection of the Company employees, property, and business practices.

To enable employees to be successful, the Company will develop clear and reasonable performance expectations, investigate the circumstances of policy violations or unsatisfactory performance before taking disciplinary action, and ensure that prompt, consistent disciplinary action is administered where required.

Guidelines

If the Company deems that an employee is not performing their assigned duties proficiently or are non-compliant or in breach of the Company policies and procedures, corrective action may be necessary.

The Company will use this Progressive Discipline Process to:

- Alert employees to observed behaviors or concerns ('infraction') and provide a reiteration (or in some cases, clarification) of expectations, including policy or procedure overview (where applicable).
- Advise employees of the consequences associated with further infractions; and
- Provide a plan towards a method of improvement.

Depending on the severity or frequency of the infraction, the Progressive Discipline Process will normally include the following (some steps may be skipped or repeated):

1. **Initial/Verbal Warning** – The immediate supervisor/ manager will speak privately with the employee concerning inappropriate behavior or performance concern and the desired changes expected. Additional coaching and/or training may be provided to improve the employees’ performance.
2. **Written Warning** – A Written Warning may be issued for performance matters that are serious in nature or have continued following a Verbal Warning, outlining the inappropriate behavior and the desired changes expected. Additional coaching and/or training may be provided to improve the employees’ performance. The Written Warning will be kept in the employee’s personnel file with a copy given to the employee.
3. **Final Written Warning** – A Final Written Warning may be issued to the employee, outlining the inappropriate behavior and the desired changes expected. The Final Written Warning will indicate that immediate change in behavior is required; otherwise, termination of employment will be pursued. The Final Written Warning will be kept in the employee’s personnel file with a copy given to the employee.

In cases of serious misconduct or behavior of a serious nature, some, or all the above steps may be omitted at the discretion of management. In some cases, termination of employment may be appropriate and justified, at the sole discretion of the Company.

Acknowledgment

Acceptance of Employee Handbook

I have received the Company's current Employee Handbook and have read and understand the material covered. I have had an opportunity to ask questions about all the policies, procedures, and guidelines in this Handbook, and I understand that any future questions that I may have about the Handbook or its contents will be answered by my immediate supervisor / manager.

I agree to and will comply with the policies, procedures and other guidelines set forth in the Handbook. I understand that the Company reserves the right to change, modify or remove any or all the policies, benefits, rules, and regulations contained or described in the Handbook as it deems appropriate at any time, with or without notice. I acknowledge that neither the Handbook nor its contents are an express or implied contract regarding my employment with the Company.

I also acknowledge if any provision of this Employee Handbook is deemed invalid or unenforceable, it will not affect the validity or enforceability of any other provision within the Employee Handbook, which will remain in full force and effect.

The terms and conditions of an individual employment contract will supersede this Handbook.

Employee Signature

Stephanie Lourie

Date

Employee Name (Printed)

Stephanie Lourie

This Handbook contains unpublished, confidential, and proprietary information. No disclosure, duplication, or use of any portion of the contents of these materials for any purpose may be made without the prior express written consent of the Company's CEO.

These policies supersede all previous employee policies and memos that may have been issued from time to time on subjects covered in this Handbook.

Title	Employee Manual FLC Version 2024
File name	HumiFile661d33b64499e7.79590971.pdf
Document ID	95229694c623affd6f84c5de95c81f210ac376a3
Audit trail date format	MM / DD / YYYY
Status	● Signed

This document was signed on hr.humi.ca

Document History



SENT

04 / 15 / 2024

14:17:30 UTC

Sent for signature to Stephanie Lourie

(stephanie.lourie@farmlending.ca) from hellosign@humi.ca

IP: 52.60.240.64



VIEWED

04 / 16 / 2024

22:32:39 UTC

Viewed by Stephanie Lourie (stephanie.lourie@farmlending.ca)

IP: 216.154.176.80



SIGNED

04 / 16 / 2024

22:49:17 UTC

Signed by Stephanie Lourie (stephanie.lourie@farmlending.ca)

IP: 216.154.176.80



COMPLETED

04 / 16 / 2024

22:49:17 UTC

The document has been completed.