



Golf Sudbury

HUMAN RESOURCES
COMPLIANCE POLICY MANUAL

March 2025

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WELCOME

ABOUT OUR ORGANIZATION

We would like to welcome you to Golf Sudbury (the "Company"). It is our pleasure to welcome you to our team. Since the beginning of the company's activities, we have always attributed our success to the work and cooperation of our staff.

Whether you are a new employee or have been working for a few years at Golf Sudbury, this Compliance Policy Manual is intended to answer questions you may have about the Company. It is intended to be a working tool that you can refer to when necessary to learn about, or remember, many aspects of your work environment.

Our mission and values, organizational structure, policies, procedures and current practices are elements that shape the organizational culture of Golf Sudbury.

Management can also provide you with information and guidance on how the organization works. Please note that we reserve the right to revise, at any time, the nature and content of our policies, and practices in line with its financial capabilities and market developments.

Please also note that the *Employment Standards Act* of Ontario will always take precedence over this document. Should you wish to make any suggestions and/or comments to improve the quality of your work environment and the diversity of services offered, we invite you to discuss them with management.

We are pleased to have you on board and we hope that your experience with our team will be a rewarding one. If you have any questions or recommendations regarding this Compliance Policy Manual, please do not hesitate to contact me or any member of the management team.

A handwritten signature in dark ink, appearing to read "Tom Arnott", with a stylized flourish at the end.

Tom Arnott, General Manager

VALUES

Teamwork

We believe that our development is based on the involvement of our staff and we encourage teamwork and collaboration between all staff members.

Respect

We are committed to respect in the workplace. It is important to treat our peers and clients fairly, while being sensitive to the needs of each individual.

Innovation

To remain competitive, we strive to encourage new ideas by maintaining a continuous improvement program. We believe in human potential and ensure that we implement projects to improve our processes.

Recognition

To remain an employer of choice, we recognize our staff and continually seek to contribute to their job satisfaction. We focus on their training and on sharing their skills.

Health and Safety at Work

To remain a responsible employer, we ensure that each member of the team is committed to promoting and practicing a safe approach to work in all circumstances. This approach is the best guarantee of continuous improvement in health and safety.

SCOPE AND FORCE OF POLICIES

At Golf Sudbury, we strive to create a fair and efficient workplace where employees are safe and can thrive.

These policies apply to all employees at Golf Sudbury whether they're part-time, full-time, temporary, permanent, students, or management, and are intended to provide a consistent set of guidelines to direct the behavior of all members of our team. They are based on current legislation and best practices and, therefore, may need to be amended from time to time. If there are any discrepancies between the policies in this manual and current legislation, the legislation will take precedence. Employees are expected to be familiar with the contents of this manual and to refer to it as necessary to inform their actions and behavior.

OPEN DOOR

Golf Sudbury is committed to an open and accessible environment for employee communication, feedback, suggestions, and complaints. This communication may be provided by email, text, verbally, or otherwise (e.g., on the company's message board, etc.).

We have instituted an Open Door Policy to ensure that employees feel comfortable and safe bringing forward items that may need attention in the business. An Open Door Policy also means that in the event that an employee is nervous about bringing a concern forward to a specific person, they may bring it forward to another person in the organization without fear of repercussion.

*Please note that in the event that a complaint involves any element relating to discrimination, violence, or harassment, the investigation procedures in those applicable policies (Anti-Violence Policy, Anti-Harassment Policy, Human Rights Policy, etc.) will be followed rather than what is outlined in this policy.

Supervisor/Manager

Employees are encouraged to speak first to their immediate supervisor/manager regarding suggestions for improvements, changes to processes, etc., as their supervisor/manager would be the closest to be able to see how changes could be implemented. In the event that an employee is uncomfortable speaking to their direct supervisor/manager, they may speak to any other member of management they feel comfortable with.

Meeting Time

Employees are encouraged to request a time to speak with their chosen communicator, bearing in mind key operational responsibilities and deadlines. As much as possible, employee requests will take precedence over other issues, although there may be times when it is not possible to grant the time immediately.

Remedies

Employees should be considering what an ideal state would mean for them when bringing forward a complaint.

Follow-Up

During the meeting, the supervisor/manager to whom you are speaking will provide you with a date for follow-up of the concern you brought forward (as needed). For matters of urgency, they will try to resolve it as soon as possible. For matters of process that require input from additional stakeholders, this may take additional time. Regardless, if an employee is not provided with a follow-up date, they should request one.

Violence, Harassment, Discrimination and Investigation

Once in the meeting, employees should feel free to pass along what is concerning them, but must be aware that any complaints relating to discrimination, harassment, or violence, must be pursued further. Reporting any of the above, whether the employee is the subject of or witness to; will trigger an investigation as soon as possible. While requests for confidentiality will be adhered to as much as possible, there are times, for investigative purposes, when an employee's identity must be divulged.

Matters Relating to Health and Safety

For any matters relating to an immediate and urgent safety issue, employees should speak with whoever is available immediately, be it their supervisor/manager (if available), a committee member, or the authorities (9-1-1), rather than book in for a meeting. Safety is not a matter that can wait!

For non-urgent safety matters, employees are encouraged to email their supervisor or committee member.

Speaking Up for Another Employee

While Golf Sudbury understands there are times an employee may feel uncertain about sharing concerns and ask another person to do so on their behalf, employees are encouraged to speak up for themselves as much as possible. While we will do our best, it is difficult for Golf Sudbury to take appropriate action unless the employee who is the subject of the open door comes forward.

Repercussions

Employees will not be subject to any repercussions for bringing forward their thoughts, ideas, or opinions for the business. However, if it is found that an employee contravened any other policies, such as Workplace Anti-Violence, Workplace Anti-Harassment, Human Rights Policy, the employee will be subject to the progressive discipline process, up to and including termination of employment.

MUTUAL COMMITMENTS

Golf Sudbury firmly believes that a positive working environment will not only ensure maximum staff productivity, and therefore long-term employability, but also a friendly and stimulating working atmosphere. An attitude of listening and openness is required in all departments of the company. The management's door is always open to constructive exchanges and several means of communication are available to staff so that they can quickly and easily convey their message to the people concerned. Good understanding is the business of all members of the company.

We are committed to providing a safe and healthy work environment for all our employees. In return, we ask for a commitment to Golf Sudbury. All employees must comply with company policies and health and safety regulations.

KEY LEGISLATED POLICIES

ACCESSIBILITY

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

DEFINITIONS

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

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

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

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

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

POLICY

Golf Sudbury will make every reasonable effort to meet the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005, including all applicable elements of the *Integrated Accessibility Standards*.

1. Information and Communication
2. Employment

3. Customer Service
4. Design of Public Spaces
5. Transportation

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

Information and Communication

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

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

This extends to any emergency procedures or safety information prepared by Golf Sudbury.

Employment

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

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

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

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

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

Customer Service

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

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

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

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

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

Support Workers

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

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

Service Interruptions

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

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

Process for Receiving Feedback

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

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

Transportation

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

Design of Public Spaces

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

HUMAN RIGHTS COMMITMENT

Golf Sudbury is committed to upholding the human rights of all employees. Specifically, Golf Sudbury will ensure that every employee has a right to equal treatment under the protected grounds and aspects of employment established by the *Ontario Human Rights Code*:

- Age
- Ancestry, colour, race
- Citizenship
- Ethnic origin
- Place of origin
- Creed
- Disability
- Family status
- Marital status (including single status)
- Gender identity, gender expression
- Record of offences (in employment only)
- Sex (including pregnancy and breastfeeding)
- Sexual orientation

POLICY

Golf Sudbury will not discriminate against any of its employees under any of the protected grounds outlined above.

Furthermore, Golf Sudbury will ensure equal treatment for its employees, including, but not necessarily limited to, the following processes:

- Job applications
- Recruitment
- Training
- Transfers
- Promotions

- Apprenticeship terms
- Dismissal
- Layoff

Golf Sudbury will ensure that this right to equal treatment is upheld in the areas of rate of pay, overtime, hours of work, holidays, benefits, shift work, discipline, and performance evaluations.

Duty to Accommodate

Golf Sudbury has a duty to accommodate employees to eliminate negative treatment based on the prohibited grounds of discrimination. Golf Sudbury will accommodate to the point of undue hardship which can only be considered when adjustments to a policy or practice would incur financial cost, necessitate outside funding, or create risks to the health or safety of a person.

Filing a Complaint

Golf Sudbury acknowledges that an employee who believes their rights have been violated may speak to a Human Rights Officer or file a complaint with the Ontario Human Rights Tribunal. Golf Sudbury will not retaliate against any employee who has filed a complaint with the Tribunal or had someone file a complaint on their behalf.

PAY EQUITY

The purpose of this policy is to demonstrate Golf Sudbury's dedication to Pay Equity, or providing equal pay for equal work, as legislated under the *Employment Standards Act, 2000 (ESA)* and the *Pay Equity Act* (Ontario). Employee pay rates will be based on the following criteria: skill, effort, responsibility, and working conditions.

DEFINITIONS

As per Ontario.ca or *The Pay Equity Act*:

"Equal work" means the employees perform substantially the same kind of work in the same establishment, the work requires substantially the same skill, effort and responsibility and is performed under similar working conditions. Each of these conditions must be met for equal pay for equal work to be required.

"Substantially the same kind of work" means the work does not have to be exactly the same. What matters is the actual work performed by the employees, not the stated conditions of their job offer or their job description.

"Skill" means the amount of knowledge, physical skill or motor skills needed to perform a job. This includes:

- education, like post-secondary degrees and diplomas
- training, like apprenticeships
- experience, like the number of years required to master a skill or gain expertise

- manual dexterity, like hand-eye coordination

“Effort” is the physical or mental effort regularly needed to perform a job.

POLICY

Golf Sudbury believes in providing women and men equal pay for work of equal value and is committed to using objective factors of skill, effort, responsibility, and working conditions when compensating employees. Further, we will ensure the male-female job-to-job comparison method is utilized when assigning compensation to ensure gender neutral pay.

Golf Sudbury will not pay one employee at a rate of pay less than another employee on the basis of sex when:

- they perform substantially the same kind of work in the same establishment
- their work requires substantially the same skill, effort, and responsibility
- their work is performed under similar working conditions

Golf Sudbury will not lower employees’ rates of pay to create equal pay for equal work.

Employer’s Responsibilities

Golf Sudbury will:

- Establish and maintain compensation practices that provide for pay equity
- Examine and evaluate its job positions using fair and equitable standards as outlined in the *Employment Standards Act* and *Pay Equity Act*
- Utilize the male/female job-to-job comparison method outlined in the *Pay Equity Act* to ensure gender-neutral pay

Exceptions

Where employees of different sexes are doing equal work, they can be paid different rates of pay if the difference is due to:

- a seniority system
- a merit system
- a system that measures earnings by production quantity or quality

Employees who perform equal work can also be paid different rates of pay if the difference is based on any other factor other than sex.

Reprisals

Golf Sudbury will not punish an employee in any way for asking other employees about their rates of pay to find out if an employer is providing equal pay for equal work or for disclosing their own rate of

pay to another employee for the purpose of determining or assisting that employee in determining whether they he or she are receiving equal pay for equal work.

Filing a Claim

In the event an employee believes that the organization is not complying with the equal pay for equal work provisions, the employee may file a claim with the Ministry of Labour.

PROTECTION OF PERSONAL INFORMATION

Golf Sudbury is committed to upholding the privacy of private and identifiable information. While Golf Sudbury is not subject to the protection obligations outlined in *the Personal Information Protection and Electronic Documents Act* (PIPEDA), this policy is based upon PIPEDA's 10 Fair Information Principles and is intended to ensure the safety of employee personal information.

DEFINITIONS

As defined by PIPEDA, personal information includes: any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type
- Opinions, evaluations, comments, social status, or disciplinary actions
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).

Ten Fair Information Principles

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

POLICY

Golf Sudbury will ensure that any private employee information that is collected adheres to the principles outlined below:

1. **Accountability:** Golf Sudbury is responsible for all employee personal information under its control and will ensure its accountability to the 10 Fair Information Principles.

2. **Identifying purposes:** Golf Sudbury will always identify to employees why their personal information is being collected.
3. **Consent:** Employee consent is required for the collection, use, or disclosure of employee information, as appropriate.
4. **Limiting collection:** Golf Sudbury will only collect the personal employee information that is required for the administration of pay, benefits, and other human resource activities. This information will always be collected in fair and legal ways.
5. **Limiting use, disclosure, and retention:** Unless required by law, all private employee information collected by Golf Sudbury will only be used for the purposes for which it was collected. Private employee information will only be retained as necessary to serve the purposes for which it was collected.
6. **Accuracy:** Golf Sudbury will maintain personal employee information as accurate, complete, and as up to date as possible. Golf Sudbury may request periodic updates from its employees to ensure that the information on file is accurate.
7. **Safeguards:** Golf Sudbury will protect any personal employee information it has collected, either by locked filing cabinets, encrypted drives, or any other means necessary to ensure the privacy of the information.
8. **Openness:** Golf Sudbury will disclose its purposes for the collection of employee information and will have this information available upon request from employees.
9. **Individual access:** Employees of Golf Sudbury have the right to view what personal employee information has been retained. Further, employees may challenge the accuracy of this information and make modifications to the information, as necessary.
10. **Challenging compliance:** While Golf Sudbury is not subject to the compliance regulations under PIPEDA, it will endeavor to meet or exceed the principles established by the Act. Should an employee bring forward a way that Golf Sudbury could improve the safety of personal employee information, they may bring it forward to your supervisor.

SMOKE-FREE WORKPLACE

Extensive health research has shown that smoking or inhaling second-hand smoke has an adverse effect on health and wellness. Golf Sudbury is committed to upholding the law and promoting a safe and healthy workplace for all employees and visitors by prohibiting smoking and vaping in enclosed workspaces.

DEFINITIONS

The following definitions have been taken from Ontario.ca or the *Smoke-Free Ontario Act*.

“Enclosed workplace” means any part of a building, structure, or vehicle with a roof that an employee works in or visits, even during off-hours. This includes hotel rooms and vehicles used for business purposes.

“Electronic cigarettes” means a vaporizer or inhalant-type device, whether called an electronic cigarette or any other name, that contains a power source and heating element designed to heat a substance and produce a vapour intended to be inhaled by the user of the device directly through the mouth, whether or not the vapour contains nicotine.

“Smoking” means smoking (inhaling and exhaling) or holding lighted tobacco or cannabis (medical or recreational).

“Vaping” means inhaling or exhaling vapour from an electronic cigarette (e-cigarette) or holding an activated e-cigarette, whether or not the vapour contains nicotine.

POLICY

Golf Sudbury is a smoke-free workplace.

No smoking or vaping is permitted on company premises by employees, contractors, or visitors at any time, except within any designated smoking areas. Designated smoking areas at all Golf Sudbury properties are behind buildings in location not accessed by the public, at least 9 meters from any doorway. Proper butt disposal is required, no butts on the ground. Smoking or vaping are also prohibited in any other enclosed workplace such as hotel rooms or vehicles being used for company business.

In accordance with the *Smoke Free Ontario Act* (SFOA), Golf Sudbury will:

- Post the required smoke-free signage at each entrance and exit of the enclosed workplace, place, or area in appropriate locations and in sufficient numbers to ensure that employees and the public are aware that smoking and the use of electronic cigarettes is prohibited in the enclosed workplace, place, or area
- Ensure that no ashtrays or similar equipment remain in the enclosed workplace or place or area, other than a vehicle in which the manufacturer has installed an ashtray

If a designated smoking area has been created, it will be clearly marked with signage. This is the only place employees, visitors or contractors may smoke or vape, provided they do so in a safe manner, with all extinguishable and smoking product materials disposed of properly in the appropriate trash receptacle.

There is no obligation of the company to provide smoking breaks outside of designated break times.

This policy is intended for the workplace only. While Golf Sudbury supports employees in living a healthy lifestyle, it will not penalize employees for smoking or vaping in their personal life.

Non-Compliance

Employees who do not comply with the guidelines of the *Smoke-Free Ontario Act (SFOA)*, as set out in this policy, will be subject to disciplinary action, including possible suspension or even termination of employment.

EMPLOYMENT STANDARDS POLICIES

DISCONNECTING FROM WORK

Golf Sudbury is committed to taking every precaution reasonable in the circumstances for the protection of the health and safety of workers, as required by the *Occupational Health and Safety Act*.

Golf Sudbury is also committed to providing a supportive workplace that promotes and supports stress reduction and mental health. Additionally, Golf Sudbury is committed to ensuring that its employees are able to maintain an appropriate work/life balance and fulfill their family responsibilities.

As an organization of more than 25 employees as of December 2, 2021, Golf Sudbury has the following policy in place regarding an employee's right to disconnect from work.

SCOPE

This policy applies to all employees of Golf Sudbury who are covered by the *Employment Standards Act*, whether their primary location of work is in the workplace, at home, on the road, or a combination of any or all of the above.

In this policy, Section One applies to non-exempt employees and Section Two applies to exempt employees.

EFFECTIVE DATE AND CHANGES

In the event of any future changes to this policy, the date of the changes made will be included in this section.

EMPLOYEE COUNT

Employees to be counted include "anyone who meets the definition of "employee" is counted, including homeworkers, probationary employees, some trainees, officers of a corporation who perform work or supply services for wages, employees on definite term or specific task contracts of any length, employees who are on lay-off, so long as the employment relationship has not been terminated and/or severed, employees who are on a leave of absence, employees who are on strike or who are locked-out, and employees who are exempt from the application of part(s) of the ESA."

Note: in the event that Golf Sudbury does not have 25 employees as of January 1, but grows to 25 employees during the year, the organization will put this policy in place by the following March 1. Should Golf Sudbury's total employee count decrease to fewer than 25 employees, the policy will remain in place until the following January 1, at which point if the employee is still below 25, a written policy is not required.

DEFINITIONS

As defined in the *Working for Workers Act*, “Disconnecting from Work” means not engaging in work-related communications, including emails, telephone calls, video calls or the sending or reviewing of other messages, so as to be free from the performance of work.

POLICY

Providing Copies of this Policy to Employees

Golf Sudbury will provide this written policy to all employees within 30 days of its effective date.

If any changes are made to this policy, employees will be provided with the updated policy within 30 days of any amendments.

In the case of newly hired employees, Golf Sudbury will provide a copy of this policy to them within 30 days of their date of hire.

The policy may be provided either:

- As a printed copy, or
- An attachment to an email, or
- A link to a document online

If an employee is not able to access the document online or cannot print the document, they may request a printed copy from Golf Sudbury.

Employment Standards Time Away from Work

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

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

Mental Health in the Workplace

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

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

Section One: Connection and Disconnection Expectations – Non-Exempt Employees

Email

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

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

To ensure that these guidelines are not compromised, Golf Sudbury needs to be aware of when employees are on work time and when they are not. This means that employees need to email their supervisor and put an out-office on their email/calendar when they will not be working during Golf Sudbury's core hours.

Response Time for Emails

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

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

Out of Office

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

Phone (Personal and Business)

Employees are expected to follow the below guidelines regarding the use of phones for the completion of their job duties.

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

Response Time for Phone Calls, Voicemails, and Text Messages

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

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

Out of Office

Employees are expected to regularly update their voicemail with their expected schedule so that the most up-to-date information will be communicated to those who are calling outside of their work hours.

Personal Cell Phones

Golf Sudbury recognizes that personal cell phones can be valuable tools for our employees. If a client or colleague communicates with an employee on their personal cellular phone during their off-work hours, employees do not need to answer or reply until they are within their working hours the following business day.

Employees are encouraged to turn off cell phone notifications when they're away from the office.

Other Communication Channels

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

Section Two: Connection and Disconnection Expectations – Exempt Employees

The following guidelines apply to exempt employees under the definitions established by the ESA, including supervisors and managers.

Email

Managers are expected to follow the below guidelines regarding the use of Golf Sudbury's email systems. These guidelines also apply if a manager needs to use their personal email in the event of an emergency or an unforeseen circumstance.

Managers are expected to respond to emergency emails during their off-duty time. Golf Sudbury has an expectation that managers will respond to emergency emails ONLY during their off-work time.

To ensure that these guidelines are not compromised, Golf Sudbury needs to be aware of when managers are on work time and when they are not. This means that managers need to update their calendar and put an out-office on their email when they will not be working during Golf Sudbury's core hours.

Response Time for Emails

- Managers are expected to respond to emails received during the workday, up to 30 minutes prior to the end of the workday, on the same day whenever possible.
- Emails that are not emergencies received during after-hours Monday through Thursday are expected to be replied to within 24 hours of their receipt.
- Emails that are not emergencies received after-hours on Friday, Saturday, or Sunday are expected to be replied to on the Monday following, unless the manager is not working, in which case they may be replied to on the next working day.
- Emergency emails must be responded to as promptly as possible in the best interest of the business.

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

Out of Office

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

Phone (Personal and Business)

Managers are expected to follow the below guidelines regarding the use of phones for the completion of their job duties.

Managers are expected to respond to emergency phone calls and texts during their off-duty time. Golf Sudbury has an expectation that managers will respond to emergency calls and texts ONLY during their off-work time.

Response Time for Phone Calls, Voicemails, and Text Messages

- Managers are expected to respond to phone calls, voicemails, and text messages received during the workday, up to 30 minutes prior to the end of the workday, on the same day whenever possible.
- Non-emergency phone calls, voicemails, and text messages received Monday through Thursday after-hours are expected to be replied to within 24 hours of their receipt.
- Non-emergency phone calls, voicemails, and text messages received after-hours on Friday, Saturday, or Sunday are expected to be replied to on the Monday following, unless the manager is not working, in which case they may be replied to on the next working day.
- Emergency calls/texts must be responded to as promptly as possible in the best interest of the business.

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

Out of Office

Managers are expected to regularly update their voicemail with their expected schedule so that the most up-to-date information will be communicated to those who are calling outside of their work hours.

Personal Cell Phones

Golf Sudbury recognizes that personal cell phones can be valuable tools for our managers.

If a client or colleague communicates with a manager on their personal cellular phone during their off-work hours, managers do not need to answer or reply until they are within their working hours the following business day, unless it is an emergency call.

Managers are encouraged to turn off cell phone notifications when they're away from the office.

Other Communication Channels

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

Responsibilities

Employees are expected to:

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

Supervisors/managers are expected to:

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

Complaints

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

Updates to this Policy

This policy may be updated or amended based on direction from the Government of Ontario.

Retention

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

ELECTRONIC MONITORING

Golf Sudbury is committed to abiding by all of its obligations under Ontario's Employment Standards Act, 2000 (ESA), specifically those that apply to electronic monitoring. As such, Golf Sudbury is committed to informing its employees about the presence (if any) of electronic monitoring software or equipment either in the workplace or contained on any of the organization's servers or programs.

This policy is based on [Bill 88: Working for Workers Act, 2022](#) and is subject to change as per any new information provided by the Government of Ontario.

This policy is intended to specify:

- A description of how and in what circumstances, Golf Sudbury may electronically monitor employees,
- The purposes for which Golf Sudbury may use the information obtained through electronic monitoring, and
- The date the policy was prepared and the date any changes were made to the policy.

This policy offers standards to ensure the following:

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

SCOPE

As an organization of more than 25 employees as of January 1, 2022 (note: part-time and casual employees, as well as employees at different company locations, are counted in this total), Golf Sudbury is required to have this policy in place regarding electronic monitoring.

This policy applies to all employees of Golf Sudbury who are covered by the *Employment Standards Act*, whether their primary location of work is in the workplace, at home, on the road, or a combination of any or all of the above.

EFFECTIVE DATE

This policy is effective as of its creation date. The ESA required it by Oct 11, 2022, and following the first year, it must be in place by March 1 of any year when an organization employs 25 or more employees as of January 1 of that calendar year.

CHANGES TO THIS POLICY

Any changes to this policy will be noted in this section, along with the date(s) that changes were made.

EMPLOYEE COUNT

Employees to be counted include “anyone who meets the definition of “employee”, including: “homeworkers, probationary employees, some trainees, officers of a corporation who perform work or supply services for wages, employees on definite term or specific task contracts of any length, employees who are on lay-off, so long as the employment relationship has not been terminated and/or severed, employees who are on a leave of absence, employees who are on strike or who are locked-out, and employees who are exempt from the application of part(s) of the ESA.”

Note: in the event that Golf Sudbury does not have 25 employees as of January 1, but grows to 25 employees during the year, the organization will put this policy in place by March 1 of the following year.

Should Golf Sudbury’s total employee count decrease to fewer than 25 employees, the policy will remain in place until the following January 1, at which point (if the employee count is still below 25), a written policy is no longer required.

POLICY

ESA Requirements

The ESA requirements do not:

- establish a right for employees not to be electronically monitored by their employer; or
- create any new privacy rights for employees.

However, the ESA requires transparency about whether employees are electronically monitored. Nothing in the ESA limits the use of information obtained through electronic monitoring.

Providing Copies of this Policy to Employees

- Golf Sudbury will provide this written policy to all employees within 30 days of its effective date.
- If any changes are made to this policy, employees will be provided with the updated policy within 30 days of any changes.
- In the case of newly hired employees, Golf Sudbury will provide a copy of this policy to them within 30 days of their date of hire.

The policy may be provided either:

- As a printed copy, or
- An attachment to an email, or
- A link to a document online

If an employee is not able to access the document online or cannot print the document, they may request a printed copy from their supervisor/manager.

Electronic Monitoring Equipment in Place

Golf Sudbury has the following electronic monitoring equipment in place in the workplace;

- Email monitoring software
 - All email communications sent using company-owned networks, equipment, or user accounts are monitored, and this may include personal email accounts accessed through company-owned IT assets.
- Video cameras and recording equipment for public areas
 - Video surveillance technology is used on company premises to deter theft, and vandalism, and ensure employee safety. Should illegal conduct be uncovered, video surveillance footage may be disclosed to approved third parties. Bathrooms, changing rooms, and other private spaces do not have video surveillance. Video surveillance equipment will be clearly visible and does not include audio.
- Internet and app activity monitoring, including downloaded documents and accessed websites, etc.
 - Golf Sudbury monitors employee network and computer activities to verify that company-owned IT resources are used only for work-related or professional activities. Computer activity data can evaluate employee performance, detect malicious or high-risk behaviors, monitor network performance, and avoid security incidents.

- GPS monitoring is in place in company vehicles which tracks both geography, time, speed, etc.
 - Golf Sudbury has GPS monitors in place in company vehicles to ensure employee safety and security and to send help if an employee is ever in danger. These records may also be accessed in the event of an accident.
- Biometric technology
 - Biometric technology is in use for access to the building and to specific work areas for employees.

Reasons for Accessing the Electronic Records for Monitoring Equipment

Golf Sudbury will access the records for this equipment in the following circumstances:

- In the event of an investigation into a client complaint
- In the event of a complaint of nonpayment for time worked
- In the event the authorities request electronic records
- In the event of a complaint of harassment or violence

Data Retention

All data obtained by workplace monitoring will be retained digitally on an encrypted drive with password protection and will be retained for no longer than is required per privacy law, unless it is the subject of an investigation. Personal information will only be held longer in extraordinary circumstances or by law.

Retention of this Policy

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

Questions or Complaints

Any questions or complaints regarding this policy should be directed to the employee's supervisor.

HIRING

The purpose of this policy is to outline the processes Golf Sudbury will follow to ensure our hiring practices are fair, consistent, equitable and in line with all applicable legislation such as the *Ontario Human Rights Code*, the *Accessibility for Ontarians with Disabilities Act*, and the *Employment Standards Act*.

POLICY

Golf Sudbury is committed to the principles of equality and diversity in the workplace. We aim to hire the best candidate for the position based on their qualifications and merit in terms of knowledge, skills, and experience. Golf Sudbury will not discriminate against job applicants on any of the grounds

protected by human rights legislation during any phases of the recruitment, screening and hiring process.

We welcome applications from persons with disabilities and will provide accommodations during all stages of the hiring process, upon request. This statement will be added to any job postings and all applicants will be reminded of this policy: 1) when they are invited to an interview, and 2) within any job offer provided. All hiring managers of Golf Sudbury will treat all job applicants with dignity and respect.

At no time during the interview process will any questions be asked that touch on any prohibited areas outlined in the *Human Rights Code* (such as age, ancestry, colour, race, citizenship, ethnic origin, place of origin, creed, disability, sex/pregnancy, family status, marital status, sexual orientation, gender identity, gender expression, and record of offences).

Reference checks must be completed for any candidate that is considered for hiring prior to making an offer of employment, to validate credentials and the accuracy of information provided by the candidate during the recruitment and screening process.

Any offer of employment will outline the terms and conditions of employment, including any further steps that the applicant must agree to complete to be eligible for employment (example: successful police records check).

Offers of employment will contain a probationary period of at least three months, so that both the employer and employee can trial the fit between the employee and the position, without any negative consequences.

Once the offer of employment is signed by the employee and any additional agreed terms have been met, the new employee may begin work at the agreed upon date. New employees will receive orientation and training about key policies and safety issues that pertain to their position or that are required by law.

Golf Sudbury will ensure any personal information collected during any stage of the recruitment and hiring process is retained in an appropriate manner and remains confidential.

HOURS OF WORK AND OVERTIME

Golf Sudbury is committed to ensuring that all employees are compensated, at minimum, as per the standards outlined in the Ontario *Employment Standards Act* (ESA).

DEFINITIONS

Overtime is defined as any hours worked above 88 in a two week period.

POLICY

At Golf Sudbury, employees are required to work the number of hours as established in their employment contract. Golf Sudbury employees will at times be requested to work hours above their

usual hours of work. For the purposes of this policy, hours worked beyond an employee's usual number of hours but below the overtime threshold of 88 hours bi-weekly will be paid in straight time.

Any hours worked beyond the Ontario ESA threshold of 88 hours will be paid at a rate of time and one-half the employee's usual rate of pay.

All overtime hours must be authorized by a supervisor/manager in advance of being worked. In the event of an emergency, the hours may be worked but a manager/supervisor must be informed as soon as possible. Failure to adhere to these guidelines will result in progressive discipline.

Managers and Supervisors

Note that at Golf Sudbury, managers and supervisors who perform managerial tasks for at least 50% of their time are not generally entitled to overtime pay, specifically if they perform other tasks only on an irregular or exceptional basis.

Time in Lieu

Golf Sudbury may at times request that employees participate in a time in lieu/banked time off program. This is subject to employee agreement and will be noted either electronically or in writing if it is agreed upon. For time banked above an employee's regular hours, up until the overtime threshold, time will be banked as straight time. For any hours worked above the overtime threshold of 88 hours, these hours will be banked as time and one-half in relation to an employee's usual rate of pay.

Banked time must be taken within three months of the week in which it was earned. On occasion, Golf Sudbury may request that an employee take this time at a later date. With the employee's agreement, this time away may be taken within 12 months of when the time was earned.

In the event the employee is separated from Golf Sudbury before they have taken the extra time, the employee will receive the hours banked on their final pay cheque.

PROTECTED LEAVES

Golf Sudbury recognizes that qualified employees have the right to take job-protected leave without any negative consequences to their employment. As such, Golf Sudbury is committed to adhering to the guidelines established by the Ontario *Employment Standards Act* (ESA) with respect to any job-protected leaves.

POLICY

The purpose of this policy is to outline the job-protected leaves employees have a right to take under the ESA so that:

- Employees know their rights; and
- Golf Sudbury manages employee leave in a fair and consistent manner.

Golf Sudbury will adhere to all regulations covered under the ESA.

Protected Leaves:

1. Pregnancy Leave
2. Parental Leave
3. Sick Leave
4. Bereavement Leave
5. Family Responsibility Leave
6. Family Caregiver Leave
7. Family Medical Leave
8. Critical Illness Leave
9. Child Death Leave
10. Crime-related Child Disappearance Leave
11. Domestic or Sexual Violence Leave
12. Unpaid Infectious Disease Emergency Leave
13. Organ Donor Leave
14. Reservist Leave
15. Jury Duty Leave
16. Voting Leave

Employee Rights During a Leave

Employees have the right to continue to participate in the company benefits plans during their job-protected leave of absence. This includes programs such as: pension plan, life insurance, extended health care, and dental. If an employee wishes to opt out of their participation in these company-provided benefits, they must provide their request via written notice.

Golf Sudbury will continue to pay its portion of the employee benefits contribution to an employee's benefit plan, unless the employee has provided written notice, they'd like to opt out during the leave period.

Employees will continue to accrue seniority while on a job-protected leave.

Sharing Leave Time

The total amount of leave taken by one or more employees under the ESA in respect of the same family member, child, or event is the entire amount of the leave; the leave is not doubled. Employees who are sharing the leave can be on leave at the same time, or at different times; the ESA does not provide restrictions for this. The sharing requirement applies whether the employees work for the same employer.

1. Pregnancy Leave

Pregnant employees have the right of taking a pregnancy leave constituting up to 17 unpaid weeks off work provided they have worked at Golf Sudbury for a period of at least 13 weeks leading to the due date. The earliest the leave can begin is 17 weeks before the employee's due date and the latest one can begin is the baby's due date (or actual date of birth if that arrives sooner).

If an employee is still pregnant after the 17 weeks of leave, they may continue on until the birth and then commence their parental leave. Employees are entitled to return early from their leave if they desire to do so; however, they may not split up their leave and use up the unused part later.

Miscarriages and Stillbirths

Pregnancy leave is not an entitlement when an employee has a miscarriage or stillbirth more than 17 weeks prior to their due date. If an employee has a miscarriage or stillbirth within the 17 weeks prior, they continue to be eligible for parental leave and it commences on the date of the miscarriage or stillbirth if it hasn't started yet.

Pregnancy leave for an employee who had a stillbirth or miscarriage ends either 17 weeks after the leave started or 12 weeks after the miscarriage or stillbirth (whichever is later).

Golf Sudbury employees embarking on pregnancy leave are required to provide at least two weeks' written notice prior to the start of their leave. Medical information may be requested. Where an emergency forces the leave to start early, pregnant employees must provide the notice no later than two weeks after the leave has started. In certain cases, employees may be entitled to the use of sick time prior to the start of the pregnancy leave.

This two-week notice requirement also applies if an employee needs to change the date of their pregnancy leave.

An employee may also change the date that their pregnancy leave ends, provided they provide a written notice at least four weeks in advance of the new date. If an employee does not provide Golf Sudbury with a return-to-work date, a leave of 17 weeks will be assumed, and the employee will be expected to resume work after that time.

Employees who choose not to return from pregnancy leave are required to provide at least four weeks' written notice.

2. Parental Leave

New parents are entitled to take parental leave of up to 61 or 63 weeks of unpaid time free from work. Parents may refer to a birth parent, an adoptive parent, or a person in a relationship with a parent of a child who plans on treating the child as their own. To be eligible, employees must have been hired by Golf Sudbury at least 13 weeks prior to starting their parental leave.

Birth mothers who have taken pregnancy leave are entitled to up to 61 weeks of leave. In the case of a birth mother who did not take pregnancy leave and any other new parents, they are entitled to up to 63 weeks of parental leave.

Parental leave for a pregnant employee may begin as soon as the pregnancy leave ends unless the baby has not come into their care. In this event, an employee may return to work between the pregnancy and parental leaves and then start parental leave within 78 weeks of the birth (or the date the baby first left the hospital to come home). For any other employees, parental leave must be started no later than 78 weeks after the date of the baby's birth or the date the child came into their

care, custody, and/or control. Note: the parental leave must be started in the 78 weeks but is not required to be completed then. Employees may return early from leave but may not re-embark on the leave to use up any remaining time.

Employees must provide at least two weeks' written notice before the start of a parental leave and four weeks' written notice if they desire to return to work before their leave entitlement has been used up. If an emergency occurs and the parental leave needs to begin immediately, employees are required to provide their notice of the leave at least two weeks after starting the leave.

Golf Sudbury will not penalize any employee because the employee is or will be taking either pregnancy or parental leave. Employees who take a pregnancy or parental leave are entitled to return to either their same position or a comparable one, if Golf Sudbury has eliminated their previous one.

3. Sick Leave

Employees have the right to take up to three days of unpaid sick leave each calendar year because of personal illness, injury, or medical emergency. This entitlement begins once an employee has worked for Golf Sudbury for at least two consecutive weeks. Employees may not take sick leave for cosmetic surgery or medically unnecessary procedures.

These sick leave days may not be carried over into another calendar year if they are not used. If an employee's hire date is partway through the year, they are still entitled to the three days. As per the ESA, reasonable medical documentation may be requested. This will only include the duration of the absence, the date of the employee's medical appointment, and whether the employee was examined in person.

4. Bereavement Leave

Employees are entitled to up to two days of unpaid leave in the event of the death of a family member.

As per the ESA, family member refers to:

- A spouse (married or unmarried, of the same or opposite genders);
- Parent, stepparent, foster parent, child, stepchild, foster child, grandparent, step-grandparent, grandchild or step-grandchild of the employee, or the employee's spouse;
- Spouse of the employee's child;
- Brother or sister of the employee; or
- Relative of the employee who is dependent on the employee for care or assistance.

This entitlement starts once an employee has been employed with Golf Sudbury for a period of at least two weeks. It can be taken on the date of the death, or later for a funeral or to settle the estate. Bereavement leave entitlement resets every calendar year and the days may not be carried over. The entitlement to the two days remains the same, regardless of whether an employee of Golf Sudbury is hired partway through the year.

Golf Sudbury may request reasonable documentation of the need for the leave such as a death certificate, a funeral home notice, etc.

5. Family Responsibility Leave

Employees are entitled to take up to three days of unpaid leave each calendar year because of an illness, injury, medical emergency, or other urgent health matters relating to specific relatives. This applies to Golf Sudbury employees if their hire date is at least two weeks prior to taking the leave.

As per the ESA, the term “family members” refers to:

- Spouse (includes both married and unmarried couples, of the same or opposite genders);
- Parent, stepparent, foster parent, child, stepchild, foster child, grandparent, step-grandparent, grandchild, or step-grandchild of the employee or the employee's spouse;
- Spouse of the employee's child;
- Brother or sister of the employee; or
- Relative of the employee who is dependent on the employee for care or assistance.

Employees may take the leave whether the illness is a planned event (such as surgery that is medically necessary), or an unplanned emergency, such as an urgent matter. Urgent matters could include an unforeseen need for childcare, as an example.

Notice of family responsibility leave may occur before the leave if it is planned, or as soon as it happens if unplanned. This notice can be made orally; it does not have to be in writing. Family responsibility leave entitlement resets every calendar year and the days may not be carried over. The entitlement to the three days remains the same, regardless of whether an employee of Golf Sudbury is hired partway through the year.

Golf Sudbury may request reasonable evidence of the need for the leave. This will not include medical notes or medical information from the doctor of the family member.

6. Family Caregiver Leave

Employees of Golf Sudbury are entitled to an unpaid leave of up to eight weeks per calendar year, per specified family member, to provide support or care in the event a medical practitioner certifies that they have a serious medical condition. As per the ESA, medical practitioners could include a physician, registered nurse, psychologist, psychiatrist, or nurse practitioner. Golf Sudbury employees are entitled to this leave, regardless of the length of their term of employment.

Under the ESA, “family members” refers to:

- The employee's spouse (including same-sex spouse);
- A parent, stepparent, or foster parent of the employee or the employee's spouse;
- A child, stepchild, or foster child of the employee or the employee's spouse;
- A grandparent or step-grandparent of the employee or the employee's spouse;
- A grandchild or step-grandchild of the employee or the employee's spouse;
- A spouse of a child of the employee;
- A brother or sister of the employee; or
- A relative of the employee who is dependent on the employee for care or assistance.

Employees of Golf Sudbury do not need to produce the medical certificate prior to starting the leave but need to provide the certificate at some point during the leave. This certificate needs to include the name of the individual and that the individual has a serious medical condition but does not need to include medical specifics. Written notice is required for the family caregiver leave of absence but may be produced during the leave if the leave was not planned.

Family caregiver leave may last for up to eight weeks; however, the weeks may be taken either consecutively or separately. If an employee takes part of a week, this counts as a full week of the entitlement. Employees are required to provide written notice each time they are taking a week of leave.

7. Family Medical Leave

Employees of Golf Sudbury are entitled to family medical leave (consisting of unpaid leave for a period of up to 28 weeks in a 52-week period) to provide care or support to family members who have a significant risk of death occurring within a period of 26 weeks. This leave is different from family caregiver leave because an employee is only eligible for family medical leave if the family member who has a serious medical condition has a significant risk of death occurring within a period of 26 weeks. These leaves are also separate from the critical illness leave (outlined later in this policy).

Golf Sudbury employees are entitled to this leave, regardless of their length of service, for the care and support (e.g., emotional support or providing care) of the following family members (as per the ESA):

- The employee's spouse (including same-sex spouse);
- A parent, stepparent, or foster parent of the employee or the employee's spouse;
- A child, stepchild, or foster child of the employee or the employee's spouse;
- A brother, stepbrother, sister, or stepsister of the employee;
- A grandparent or step-grandparent of the employee or of the employee's spouse;
- A grandchild or step-grandchild of the employee or of the employee's spouse;
- A brother-in-law, step-brother-in-law, sister-in-law, or step-sister-in-law of the employee;
- A son-in-law or daughter-in-law of the employee or of the employee's spouse;
- An uncle or aunt of the employee or of the employee's spouse;
- A nephew or niece of the employee or of the employee's spouse;
- The spouse of the employee's grandchild, uncle, aunt, nephew, or niece; or
- A person who considers the employee to be like a family member (full details in the ESA).

Employees are not required to take all 28 weeks consecutively and may separate their weeks. However, if an employee takes part of a week, this will count as a full week of leave. If the family member does not pass away within the 26 weeks outlined in the original certificate, employees may continue on leave until 28 weeks have passed without needing to provide another medical certificate.

As per the ESA, there are three important periods of time relating to family medical leave:

- The 26-week period specified in the medical certificate within which the family member has a significant risk of death;

- The 52-week period that starts on the first day of the week in which the 26-week period specified in the medical certificate begins; and
- The 28 weeks of family medical leave.

The latest day an employee can remain on leave is:

- The last day of the week in which the family member dies;
- The last day of the week in which the 52-week period expires (a Saturday as per the ESA); or
- The last day of the 28 weeks of family medical leave.

It must be whichever is earlier.

Golf Sudbury employees are required to provide written notice of the need for a family medical leave of absence. If the leave is required unexpectedly, employees may provide notice as soon as possible after having started the leave. Employees must provide notice for each week of the leave if they are taking them separately.

8. Critical Illness Leave

Golf Sudbury employees are entitled to up to 37 weeks in a 52-week period of unpaid leave in the event they have a critically ill minor child or 17 weeks in the event of a critically ill adult family member (the term family member includes the same list as that of family medical leave). This leave may be taken to support or provide care for a minor child (includes a child, stepchild, foster child, or child who is under legal guardianship and is under 18 years of age). The term adult refers to a person over 18 years of age. Employees with at least six months of service with Golf Sudbury are entitled to this leave.

Employees are required to provide a medical certificate from a qualified medical practitioner which sets out who requires care and support and establishes the period of time that the care and support may be required. The certificate does not have to be produced prior to embarking on the leave but must be produced at some point during the leave. Employees must also provide written notice of their intent to take the leave and a written plan indicating the specific weeks either in advance of the leave or as soon as possible after starting it. Changes may be made to the plan under special circumstances outlined in the ESA.

If a medical certificate issued by a qualified health practitioner sets out a period during which the person requires care or support of a family member that is less than 37 weeks (for a minor child) or less than 17 weeks (for an adult), the employee is entitled to take a leave only for the period set out in the certificate. An employee's leave may be extended if the original certificate did not use up all of the leave, but another medical certificate must be issued.

Employees may take the weeks separately, or consecutively. If an employee only takes part of a week, this does qualify as a full week of leave unless the employee takes another day in the same week; these both qualify as only one week.

In the event of the death of the person for whom the employee is providing care, the leave ends at the end of the week in which the person passes away.

9. Child Death Leave

An employee of Golf Sudbury who experiences the death of a child is entitled to an unpaid leave of absence for a period of up to 104 weeks. Eligibility for this leave begins after an employee has at least six months of service with Golf Sudbury. "Child" refers to a child, a stepchild, a child under the legal guardianship of the employee, or a foster child less than 18 years of age. This leave must be taken within the 105-week period that started when the child passed away and only as a single period of leave (it may not be broken up).

A written notice and a plan for taking the leave must be provided to Golf Sudbury as soon as possible either prior to beginning the leave or once the leave has started. As necessary, Golf Sudbury may require reasonable evidence of the need for the leave.

10. Crime-Related Child Death or Disappearance Leave

Employees who have been employed with Golf Sudbury for a minimum of six months and who experience the crime-related death or disappearance of a child are entitled to up to 104 weeks of unpaid leave. The crime does not have to be proven, but probable. If an employee was a party to the crime, they are not entitled to the leave. "Child" refers to a child, stepchild, or foster child who is under 18 years of age.

This leave must be taken within the 105-week period that started when the child disappeared and must be taken all at once (it may not be broken up). If there is a change in circumstance that occurs during the leave and it is no longer probable that it is the result of a crime, the employee's entitlement to the leave ends. If the child is found alive during the leave, an employee is entitled to remain on leave for 14 days following the discovery of the child. If a child is found dead, the employee then has a separate entitlement to the child death leave.

A written notice and a plan for taking the leave must be provided to Golf Sudbury as soon as possible either prior to beginning the leave or once the leave has started. The plan may be amended under special circumstances. As necessary, Golf Sudbury may require reasonable evidence of the need for the leave.

11. Domestic or Sexual Violence Leave

Employees of Golf Sudbury who have at least 13 weeks of service are entitled to this leave in the event an employee or an employee's child has experienced or been threatened with sexual or domestic violence. This leave provides for up to ten days and 15 weeks in a calendar year of protected leave. "Child" refers to a child, stepchild, child under legal guardianship, or foster child who is under 18 years of age. The employee's first five days of leave will be paid, and the remainder of the leave is unpaid.

The leave may be taken for any of the following:

- To seek medical attention for the employee or the child of the employee because of a physical or psychological injury or disability caused by the domestic or sexual violence;
- To access services from a victim services organization for the employee or the child of the employee;

- To have psychological or other professional counselling for the employee or the child of the employee;
- To move temporarily or permanently; or
- To seek legal or law enforcement assistance, including making a police report or getting ready for or participating in a family court, civil or criminal trial related to or resulting from the domestic or sexual violence.

Employees are not entitled to the leave if they committed the violence.

The entitlement to the ten days resets every calendar year, regardless of the month in which an employee began employment with Golf Sudbury. These days may not be carried over if unused and an employee does not have to take all the days off in the same period. An employee may choose to take part days but in terms of the leave, these are counted as full days.

This entitlement extends to if an employee needs to take up to 15 weeks of domestic or sexual violence leave for the same reasons as those above. These weeks can be taken separately, or all at once. If an employee only uses part of a week, it does count as a full week of leave.

Note: Employees of Golf Sudbury will be paid for the first five days whether they take the ten days or they take leave from their 15-week entitlement.

Employees are required to provide notice, either ahead of the leave or as soon as possible after they have started the leave (this notice may be provided orally), for either length of leave. In addition, employees are not required to take the ten days leave before starting on their 15-week entitlement. Employees may be requested to provide reasonable evidence of the need for the leave.

12. Unpaid Infectious Disease Emergency Leave

Employees of Golf Sudbury have the right to this leave in the event they are not able to perform their duties because of COVID-19. The only disease for which unpaid infectious disease emergency leave may be taken at this time is COVID-19. Although the ESA was amended to include unpaid infectious disease emergency leave on March 19, 2020, the leave entitlements for COVID-19 are retroactive to January 25, 2020 and have no end date. Employees are entitled to take this unpaid leave so long as the conditions set out below are met.

Employees therefore have the right to take unpaid, job-protected infectious disease emergency leave if they are not performing the duties of their position because of specified reasons related to COVID-19 which are outlined in the ESA. Employees of Golf Sudbury are required to provide notice that they will be starting the leave or provide notice as soon as possible if they are already on leave. This notice does not have to be in writing; it may be provided orally.

There is no specified limit to the number of days an employee can be on unpaid infectious disease emergency leave and unpaid infectious disease emergency leave absences do not have to be taken consecutively. Employees can take the leave in part days, full days, or periods of more than one day. Employees may also return after a part day if the time off was taken in relation to the reasons outlined in the ESA. The employee will be entitled to their regular rate of pay for any hours worked. Note that Golf Sudbury may request reasonable evidence of the need for the leave from employees.

13. Organ Donor Leave

An employee of Golf Sudbury who has been employed with the company for at least 13 weeks is entitled to organ donor leave if they are undergoing surgery to donate all or part of certain organs to a person. As necessary, organ donor leave may be extended past the original 13 weeks to an additional 13 weeks.

Under the ESA, “organ” refers to a kidney, liver, lung, pancreas, or small bowel. This leave generally begins on the date of the surgery unless another date is specified by the certificate. The leave may be extended for employees if a qualified medical practitioner asserts that the employee requires more time away from work. The maximum length of time for organ donor leave is 26 weeks.

An employee is required to provide at least two weeks’ written notice of the need for the original leave and if there is a need to extend the leave. An employee may also return early from leave provided they have two weeks’ written notice that they intend to do so. Golf Sudbury reserves the right to request a medical certificate attesting to the need for the leave and this must be provided as soon as possible after it is requested.

14. Reservist Leave

A reservist employee who has worked for the company for at least three consecutive months and who is deployed to an operation is entitled to unpaid leave for the time that is necessary for them to be a part of the operation. The ESA sets out that an operation may include providing assistance in dealing with an emergency or its aftermath (including search and rescue operations, recovery from national disasters such as flood relief, military aid following ice storms, and aircraft crash recovery).

Employees can also take this leave if participating in Canadian Armed Forces military skills training.

Employees are required to provide written notice of the beginning and end date of their leave and will be reinstated to their same position upon returning from leave. In the event that their position has been eliminated, Golf Sudbury will reinstate them to a comparable position. As needed, Golf Sudbury reserves the right to postpone an employee’s reinstatement for two weeks, or one pay period, as needed.

15. Jury Duty Leave

Golf Sudbury will provide unpaid job-protected time away from work as necessary for employees to participate in jury duty. Employees may be requested to provide evidence of the need for them to participate in jury duty.

16. Voting Leave

Eligible employees are entitled to take three (3) hours off to vote during work hours during federal and provincial elections. The leave will be applicable where an employee’s hours of work prevent them from having three consecutive hours to vote. The hours will be paid. Note that voting is open for 12 hours.

PUBLIC (STATUTORY) HOLIDAYS

Golf Sudbury is committed to upholding the employment rights as established by the Ontario Employment Standards Act, 2000. Specifically, we will ensure that it adheres to the provisions established for public holidays in Ontario.

1. New Year's Day
2. Family Day
3. Good Friday
4. Victoria Day
5. Canada Day
6. Labour Day
7. Thanksgiving Day
8. Christmas Day
9. Boxing Day (December 26)

POLICY

Golf Sudbury will ensure that qualified employees who are entitled to taking these days off from work will be paid the appropriate public holiday pay.

As needed, Golf Sudbury may request that employees work on the day of the public holiday. To compensate for this an employee may choose one of the following:

- Be paid their regular wages on the public holiday and then receive another day off in lieu of which they will be paid public holiday pay.
- Be paid their public holiday pay, in addition to time and one half their regular rate of pay. In this case, the employees would not be entitled to another day off.

In either case, employees must agree electronically or in writing to work on the public holiday. A substitute holiday day must be scheduled for a day that is no later than three months following the earned public holiday. If a substitute holiday needs to be delayed beyond three months, employees of Golf Sudbury can agree electronically or in writing to delaying the day, but it must be allotted to the employee in the 12 months following the initial public holiday.

If an employee's employment with the organization concludes prior to the day they scheduled the substitute holiday day, Golf Sudbury will ensure that the employee's public holiday pay entitlement is included in their final wages.

Calculating Public Holiday Pay

Employees are entitled to public holiday pay in the amount of an average of the employee's regular wages earned during the preceding four weeks leading to the public holiday. In the event that the employee was on vacation entitlement, the vacation pay will also count towards the total. Then, the total is divided by 20. Note: As employees of Golf Sudbury are entitled to be paid their vacation pay before they take a vacation or on or before the pay day for the period in which the public holiday is, vacation pay will be included in the calculations.

Qualifying for Public Holiday Pay

Employees of Golf Sudbury will qualify for public holiday pay unless they:

- Fail (without reasonable cause), to work all of their last regularly scheduled day of work prior to the public holiday or all of their first regularly scheduled day of work following the public holiday, OR
- They fail without reasonable cause to work their entire shift on the day of the public holiday if required to work.

Golf Sudbury may request specifics concerning an employee's absence on their last and/or first regularly scheduled shift(s) around the public holiday to determine whether the employee is entitled to the pay in spite of their absence. Generally, reasonable cause can be shown when an event beyond an employee's control occurs and results in their absence. Employees are responsible for establishing their reasonable cause to assure their public holiday pay.

TERMINATIONS

The purpose of this policy is to ensure employee terminations are handled in a fair and consistent manner, according to legislated employment practices.

DEFINITIONS

"Termination" means a situation in which the employment relationship comes to an end due to a variety of reasons, such as resignation or the employer ending the employment relationship.

"Involuntary Termination" means the employee's departure at the hands of the employer.

"Voluntary Termination" or resignation means the decision is made by the employee to leave the job.

"Termination for cause" means an employee is terminated without notice when they are "guilty of wilful misconduct, disobedience, or wilful neglect of duty that is not trivial and has not been condoned by the employer".

"Temporary layoff" means an employer cuts back or stops the employee's work without ending his or her employment. According to the ESA, an employee is considered to be temporarily laid off when the employee has earned less than half of what he or she would ordinarily earn (or earns on average) in a week.

POLICY

Golf Sudbury will follow the rules set out in *The Employment Standards Act* (ESA) and the terms set out in an employee's contract when it comes to ending the employment relationship.

All terminations, no matter the cause, will be handled respectfully and in a confidential manner.

Voluntary Termination

In the case of Voluntary Termination or resignation, Golf Sudbury requests that employees provide a minimum of two weeks' notice to the employer, in writing.

Involuntary Termination

In the case of involuntary termination not for cause, the employee will be provided with written notice of termination which meets the criteria set out within the *Employment Standards Act*, at minimum:

Period of Employment	Notice Required
Less than 1 year	1 Week
1 year but less than 3 years	2 Weeks
3 years but less than 4 years	3 Weeks
4 years but less than 5 years	4 Weeks
5 years but less than 6 years	5 Weeks
6 years but less than 7 years	6 Weeks
7 years but less than 8 years	7 Weeks
8 years or more	8 Weeks

The employee will either work for the remainder of the time provided by the notice period (working notice) or be provided with termination pay (pay in lieu of notice) for the duration of the notice period.

Employees will be entitled to their full regular pay during the notice period and will continue to accrue vacation pay during this time. Any benefits will remain in place for the duration of the notice period. Employees may also be entitled to severance pay based on their years of service, as defined under the *Employment Standards Act*. The Human Resources Manager shall determine whether severance pay should be applied.

Employees who are terminated for just cause are not entitled to notice, pay in lieu of notice, or severance pay.

Temporary Lay-off

Golf Sudbury will refer to and adhere to the *Employment Standards Act* in the event a temporary layoff is required for any reason. The organization is not required to provide written notice of the layoff.

If an employee is laid off for a period longer than a temporary layoff as set out in the ESA, the organization understands the employee may be considered terminated according to the ESA, and will provide any termination pay to the employee, as required.

Final Pay and ROE

Upon termination, whether voluntary or involuntary, for cause or not-for-cause, the organization will:

- Provide any monies owing including any outstanding vacation pay, on the final pay after the notice period
- Issue a Record of Employment (ROE) within 5 calendar days after the end of the pay period in which an employee's interruption of earnings occurs so that eligible employees may apply for Employment Insurance (EI)

Return of Employer Property

Whether the termination is voluntary or involuntary, the employee must return all company property including such items as keys or computer devices. All intellectual property, or information, products or content created for the employer will remain the property of the employer.

Rehiring

Employees who are terminated for cause may not be eligible for rehire.

VACATIONS

Golf Sudbury understands the importance of taking time away from work to relax and recharge. It is committed to providing vacation time and pay in accordance with the *Ontario Employment Standards Act (ESA)*, at minimum. If an employee's employment contract provides a greater benefit, the employment contract shall take precedence.

POLICY

Vacation time and vacation pay at Golf Sudbury are provided according to the following chart:

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

As per the ESA, vacation pay must be at least four percent of the gross wages (excluding any vacation pay) earned in the 12-month vacation entitlement year for employees with less than five years of employment, and at least six per cent of the gross wages thereafter. All Golf Sudbury employees have their vacation pay paid as part of regular payroll every two weeks, this can be tracked on your pay stub.

Vacation time may be taken after it has been accrued in the previous 12-month vacation entitlement year. It must be taken within 10 months of being accrued.

An employee who does not complete either the full vacation entitlement year do not qualify for vacation time under the ESA. However, employees earn vacation pay as they earn wages. Therefore, if an employee works even just one hour, they are still entitled to at least four per cent (or six per cent, depending on length of employment) of the hour's wages as vacation pay.

Vacation Time

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

Maternity or Parental Leave

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

Public/Statutory Holidays and Sick Days

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

Vacation Requests

Employees are requested to please speak with their manager or supervisor at least two (2) weeks prior to requesting vacation. Vacation requests will be granted according to operational needs. Golf Sudbury reserves the right to schedule vacations for employees to ensure the smooth operation of the business and that all vacation time is used prior to the end of the year.

Termination of Employment

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

KEY HEALTH AND SAFETY

DUTY OF PERSONS DIRECTING WORK

Golf Sudbury recognizes its obligation to keep its employees safe from harm. It further understands that people who supervise or direct the work of others have a legal duty to keep those workers safe from harm. Golf Sudbury will educate and train all persons directing work to ensure they understand their obligations under the law to protect fellow workers.

SCOPE

As per the Canadian Centre for Occupational Health and Safety (CCOHS), the provisions of section 217.1 of the *Criminal Code of Canada* affect all organizations and individuals who direct the work of others, anywhere in Canada.

DEFINITIONS

“Person directing work” means any one who undertakes, or has the authority, to direct how another person does work or performs a task according to section 217.1 of the *Criminal Code of Canada*. It not only applies to persons with the title of supervisor or manager, but anyone acting in that capacity, even temporarily.

POLICY

Golf Sudbury understands that the *Criminal Code of Canada* has been amended and people who direct the work of others have a legal duty to take reasonable steps to ensure the safety of workers and the public. This means they can be held criminally responsible for failing to take reasonable steps to prevent bodily harm to the person whose work they are directing, or any other person, arising from that work or task.

Employer Responsibilities

Golf Sudbury will take every precaution reasonable in the circumstances for the protection of workers from illness and injury. This includes:

- Keeping a safe and well-maintained workplace
- Providing information and training about the hazards the workplace, proper safety equipment, and competent supervision

Further, Golf Sudbury will uphold all rights that all employees have under the *Occupational Health and Safety Act* (OHSA):

1. The right to know about hazards in their work and get information, supervision, and instruction to protect their health and safety on the job.
2. The right to participate in identifying and solving workplace health and safety problems.

3. The right to refuse work that they believe is dangerous to their health and safety or that of any other worker in the workplace.

Supervisor Responsibilities

The *Occupational Health and Safety Act (OHSA)* sets out certain specific duties for workplace supervisors. A supervisor must:

- Ensure that workers work in the manner and with the protective devices, measures and procedures required
- Ensure that any equipment, protective device, or clothing required by the employer is used or worn by the worker
- Advise a worker of any potential or actual health or safety dangers known by the supervisor
- Take every precaution reasonable in the circumstances for the protection of workers

Employee Responsibilities

Employees must comply with their duties under the OHSA to:

- Work in compliance with the Act and regulations
- Use or wear any equipment, protective devices or clothing required by the employer
- Report to the employer or supervisor any known missing or defective equipment or protective device that may endanger the worker or another worker
- Report any hazard or contravention of the Act or regulations to the employer or supervisor

EMERGENCY PREPAREDNESS AND RESPONSE

Golf Sudbury is committed to ensuring the health and safety of all employees and any visitors to its workplace. As such, Golf Sudbury has developed the following policy to guide its employees and managers in the event of emergency situations. Preparing for emergencies is a critical part of our health and safety commitment.

DEFINITIONS

An “emergency” is a situation or an impending situation that constitutes a danger of major proportions that could result in serious harm to persons or substantial damage to property and that is caused by the forces of nature, a disease or other health risk, an accident, or an act whether intentional or otherwise (*Emergency Management and Civil Protection Act*, R.S.O., 1990).

Some common types of emergencies include:

- Fires or explosions;
- Medical emergencies;
- Severe weather and earthquakes;
- Major power failures;
- Hazardous material spills; and
- Infectious diseases, specifically Covid-19.

POLICY

In order to ensure that in the event of an emergency, all of Golf Sudbury's employees are prepared for their roles and responsibilities, the following plans must be followed. These emergency plans are necessary to:

- Keep employees, visitors, and first responders free from any further injuries;
- Succeed in managing life-threatening situations;
- As much as possible, minimizing any damage to equipment, machinery, tools, and any part of the environment; and
- Ensuring a return to work as safely as possible.

In the event of any workplace injuries of any kind, Golf Sudbury will follow the appropriate reporting requirements, as per the applicable occupational health and safety regulations of the province of employment.

Accessibility Considerations

As per the *Accessibility for Ontarians with Disabilities Act* (AODA), Golf Sudbury will ensure that individualized response plans are created for any employees who identify that they will need assistance during an emergency due to a permanent or temporary disability. These responsibilities include:

- Providing individualized emergency response information to the employee;
- With the employee's consent, sharing this information with the person(s) who will be designated to aid them during an emergency;
- Reviewing the information contained in an employee's emergency response plan when:
 - The employee changes work locations (e.g., to a different floor or office);
 - The employee's overall accommodation needs are being reviewed; and
 - Golf Sudbury's general emergency response policies are being reviewed.

Golf Sudbury will ensure that regardless of whether the disability is permanent (e.g., vision loss), or temporary (e.g., broken limb), employees are afforded the same level of accommodations required.

The following four major elements have been considered for this Emergency Preparedness and Response Policy:

1. Prevention
2. Preparation
3. Response
4. Recovery

Planning Team

At Golf Sudbury, a planning team will be established. Senior management will be involved with the planning and will ensure to support its implementation. The planning team is responsible for:

- Assessing any risks or hazards to the workplace;
- Developing specifics for the emergency response plan;
- Implementing the plan (including communicating and training the plan to employees);
- Testing the plan by holding drills on an annual basis, at minimum; and
- Improving or modifying the plan as additional information becomes available.

The planning team will also ensure that it retains:

- Up-to-date emergency contact information for all employees, including supervisors;
- A schedule which outlines who will be on shift so that they may be checked off in the event of an evacuation; and
- A list of emergency names and contacts (e.g., poison control, etc.) that is kept in the main office.

Fire or Explosion Preparedness

At Golf Sudbury, there is an alarm that will be triggered in the event of a fire.

In the event of a fire:

- Employees are to evacuate, following the below evacuation procedures;
- The fire must be reported, and the information must include:
 - Who is reporting the fire;
 - What has happened (to the best of the person's knowledge);
 - Where it has happened;
 - If there are any injuries; and
 - Whether there are others who may be in the path of the fire.

Evacuation Procedures

In the event the fire alarm sounds, or there is an emergency situation that requires evacuation, Golf Sudbury employees must remain calm and proceed in an orderly fashion.

Employees are to proceed through the closest door. In the event the closest door is blocked or unavailable, employees are to proceed to another exit. Once employees are out of the building, employees are to proceed to the **designated meeting spot** (designated meeting spots are in the parking lots) so that everyone can be counted. The supervisor will have a copy of the schedule to ensure that all employees are accounted for.

Medical Emergency Preparedness

In the event of an emergency, employees are reminded that the organization has first aid kits. In addition, the employees who are first aid trained are posted on the bulletin board.

If an employee comes across a medical emergency, they are directed to call for help (911) immediately. They also need to survey the area around the injured person to ensure that there aren't any hazards that could affect their own safety before moving towards the injured person.

If the employee is first aid trained, they should follow the instructions provided during their first aid training in assessing the person, the environment, and the need for additional support. If the situation requires it, be prepared to provide aid for life-threatening situations, including bleeding, loss of a pulse, or loss of breathing.

A reminder to employees that all emergency numbers can be accessed on the bulletin board.

Employees are to provide assistance to first responders as they arrive, including by noting anything that could help the injured party, and providing any information requested by the first responders.

After the medical emergency has passed, the employee will be requested to provide a statement outlining what occurred, which may help in preventing any further occurrences. The employee is to provide the statement to their supervisor.

Severe Weather and Earthquake Preparedness

As there may be different levels of preparedness required for severe/inclement weather or earthquakes, the following procedure is for immediate danger due to an earthquake, or storm. In the event of a “weather watch”, Golf Sudbury will closely monitor the inclement weather situation, and immediately notify employees if emergency procedures need to be started. In the event of a “weather warning”, the below procedure should be followed. Golf Sudbury will ensure that the following procedure is practiced at a minimum annually.

In the event of severe weather or an earthquake, employees are to:

- Proceed to the nearest “safe place.”
 - This safe place could consist of a desk, or sturdy table, or against an interior wall, provided that there aren’t any bookcases, cupboards, windows, or any other kind of furniture that could fall during an earthquake.
- Employees are to protect their eyes by keeping their heads down.
- As after-shocks could follow an earthquake, it is important for employees to wait in their safe place until the shaking stops, and then proceed with a personal inventory, making sure that they are not injured.
- Employees should look carefully for hazards such as fire, including damaged electrical lines, broken gas lines, etc.
- Once outside, employees should move away from buildings, trees, streetlights, and any overhead wires, covering their head as they move.

Major Power Outage Preparedness

At Golf Sudbury, major power outages could occur. During an outage, the supervisor will phone the utility company to verify whether the outage is widespread. Employees are to safely gather together in a common area during the power outage.

In the event of a medical emergency during an outage, the supervisor will direct employees as needed in order to provide space for emergency services. 911 is only to be called if an emergency is life-threatening; emergency services will be overwhelmed in the event of a power outage.

As instructed, employees may be required to unplug their computers and other electrical appliances to guard against surges when the power returns. The doors to the refrigerators must be kept closed.

Hazardous Material Spill Preparedness

At Golf Sudbury, all WHMIS procedures are followed to prevent any leaks, spills, or damage due to hazardous materials. However, as accidents may occur, Golf Sudbury will follow the below steps to ensure the safety of all employees and visitors to the workplace.

When a spill occurs,

1. The first step is for employees to communicate that there is a spill to others in the area.
 - a. As required, the supervisor may commence evacuation procedures.
2. If evacuation procedures are not required, the next step will be to control the spill by closing the container, or righting what spilled over.
 - a. Note: Golf Sudbury has the following PPE available in the event of a spill; employees may access it from their supervisor.
3. The next step is to contain the hazard by ensuring that it does not spill over into any other places (this could include spreading sand, kitty litter, etc.), to prevent any open paths for the liquid.
 - a. If the employee cleaning up the spill must leave the area for any reason, they are instructed to block off the area where the spill occurred with the use of caution tape or caution cones or any other method to prevent access.
4. The next step is to clean the spill and check for damages. If any cleaning materials come into contact with a hazardous substance, they should be disposed of immediately, unless they can be safely disinfected. Golf Sudbury will follow all applicable WHMIS procedures and will never instruct employees to perform clean-up work that goes against the stated instructions on the SDS sheet. Employees are to verify which chemicals may be used to clean up spills, prior to their use.
 - a. In the event of damage to property, Golf Sudbury will ensure that the area continues to be blocked off until the appropriate repairs can be made.

HAZARD IDENTIFICATION

Golf Sudbury is committed to identifying, assessing, and removing or controlling any hazards it can in order to safeguard the health and safety of all of its employees. Golf Sudbury will take appropriate action on any recommendations put forward by the health and safety committee to control or eliminate any known hazards. In addition to those recommendations, Golf Sudbury will proactively identify hazards whenever possible in order to prevent them from becoming a danger to employees or to visitors to the workplace.

DEFINITIONS

A “hazard” is any practice, behaviour, substance, condition, or combination of these that can cause injury or illness to people, or damage to property. Source: Canadian Centre for Occupational Health and Safety (CCOHS).

“Musculoskeletal disorders” are a group of painful disorders of muscles, tendons, and nerves (CCOHS).

Hierarchy of controls:

1. Elimination or substitution;
2. Engineering controls (including substitution, isolation, or ventilation);
3. Administrative controls (including changes in job schedules or maintenance practices); and
4. Personal protective equipment (PPE) (Source: Ontario Ministry of Labour).

POLICY

Golf Sudbury will ensure that its workplace is assessed for any of the following hazards. In the event that a hazard is identified that could cause injury to an employee, Golf Sudbury will ensure to either eliminate the hazard at its source or identify another way to perform the work that would not result in injury. In the event that the hazard cannot be corrected or removed, the appropriate personal protective equipment (PPE) will be provided by Golf Sudbury.

Possible Hazard Health Effects

If any hazards at Golf Sudbury could result in any of the following adverse health effects, they shall be controlled as per the hierarchy of controls. These health effects could include:

- Disease
- Bodily injury
- Change in the way the body functions, grows, or develops
- Effects on a developing fetus
- Inheritable genetic effects
- Decrease in lifespan
- Change in mental condition
- Effects on a person’s ability to accommodate additional stress (Source: CCOHS)

Workplace Hazards

The following list represents hazards that may exist at Golf Sudbury. In the event that one of these hazards is present and poses a risk, Golf Sudbury will work towards its elimination as is feasible in the workplace, following the steps of the hierarchy of controls.

Note that this list is not exhaustive of every hazard that could be present; Golf Sudbury will reassess the workplace for additional hazards following a regular schedule (minimum quarterly).

Biological Hazards

Biological hazards could involve any of the following:

- Bacteria
- Viruses
- Insects

- Plants
- Birds
- Animals
- Humans
- Mould

As any of these biological hazards may result in negative health effects, including allergies and skin irritation, Golf Sudbury will ensure to control any of these biological hazards at the source and provide PPE when it is not possible to completely eliminate the hazard through the hierarchy of controls.

Ergonomic Hazards

The assessment of ergonomic hazards relates directly to the employee and the job that they are doing (specifically the manner in which they are completing the duties of their job). Ergonomics refers to matching the job to the employee completing the work. Ergonomic hazards can include simple actions such as:

- Lifting
- Pushing
- Carrying
- Pulling
- Lighting
- Hearing
- Sitting
- Standing

When these actions are performed in a way that contorts the body in an unnatural way, or in a persistent way which puts strain on muscles or tendons, workplace injuries could result. Golf Sudbury will perform periodic ergonomic checks to verify that employees are able to complete the actions required of their position without putting undue physical strain on themselves.

As needed, Golf Sudbury will make appropriate modifications to the workplace, including providing tools to help with manual lifting; ensuring that the lighting is adequate for the work being completed; modifying workstations to prevent musculoskeletal disorders, etc., to prevent employee injuries.

Physical Hazards

Physical hazards are elements which could affect an employee's physical health and safety if they are outside of tolerable ranges or persistent to the point of being detrimental to health. Some physical hazards could include:

- Temperature (hot or cold)
- Indoor air quality, including scents
- Noise levels (possible damage to hearing)
- Radiation (including through sunlight, UV lamps, etc.)

Golf Sudbury will assess the workplace for any of these physical hazards and ensure that all levels are within the acceptable ranges to ensure the health and safety of employees, taking needed action to correct the hazard if it is not.

Safety Hazards

Safety hazards in Golf Sudbury's workplace could consist of the tools required to perform job duties, as well as the prevention of basic slips, trips, and falls. Tools could refer to machinery, materials, transportation etc. These tools shall be assessed for safety on a regular schedule and repairs will be made to them once the need is known. Machinery such as forklifts will have daily checklists completed to ensure that they can be operated safely.

Ladders are another safety hazard present at Golf Sudbury. Employees will be provided with health and safety training on the safe operation of ladders, including three-point contact and the proper storage of ladders.

For the prevention of slips, trips, and falls, Golf Sudbury will ensure that either non-slip mats or carpet are available where rain or snow may be tracked into the building and that all steps are a standard height with any changes in elevation clearly visible.

Chemical Hazards

Golf Sudbury will follow the GHS-WHMIS 2015 regulations concerning any chemicals in the workplace and will ensure that SDS sheets are available for any chemicals present. Further, all regulations concerning the appropriate labelling, transportation, and storage of chemicals will be followed.

Psychosocial Hazards

Hazards that may be present in the workplace could consist of more than physical hazards and/or danger to the body; hazards may exist that can adversely affect an employee's mental health. Golf Sudbury has zero-tolerance for any bullying, violence, or harassment in the workplace. Further details can be found in the Workplace Anti-Harassment policy of this manual.

Golf Sudbury will also provide support for any employees under undue stress that is affecting their ability to complete their job duties. In some cases, this may involve a reassessment of priorities; in some cases, an elimination of conflicting job demands, etc.

Employee Responsibilities

Golf Sudbury employees have the responsibility of notifying their health and safety committee, or their supervisor, of any known hazards in the workplace and then working together towards a solution.

HEALTH AND SAFETY COMMITTEE

Golf Sudbury is committed to ensuring the health and safety of all its employees. In pursuit of that, Golf Sudbury will abide by all provincially outlined legislation for the province of Ontario as established

by the Ontario *Occupational Health and Safety Act*. Further, Golf Sudbury recognizes that as an employer, it has the greatest level of responsibility to ensure health and safety on its premises.

POLICY

As Golf Sudbury's workforce exceeds 20 or more employees, a joint health and safety committee is required to ensure the health and safety of all individuals on the premises. The committee shall be composed of at least two members when the number of employees is between 20-50 and at least four members when there are more than 50 employees in the workplace.

At least half of the members on the health and safety committee will not exercise any managerial/leadership duties. The members of the committee shall be chosen by the rest of the employees. Golf Sudbury will also select a managerial representative for the committee.

The management representative and the employee representative chosen by the rest of the employees are the co-chairs of the committee. They will be certified and trained as per the Ontario *Occupational Health and Safety Act*. Their time spent in training will be considered work time and they will be compensated at their regular rate of pay. Golf Sudbury is responsible for the costs incurred by the training program. In the event that one or both of the co-chairs leave Golf Sudbury, they shall be replaced, and their replacement(s) trained as soon as reasonably possible.

The following are the powers of the committee under the *Occupational Health and Safety Act*:

1. Identify situations that may pose danger or a hazard to employees;
2. Provide recommendations to Golf Sudbury on ways to improve safety in the workplace for employees;
3. Make recommendations regarding establishing, maintaining, and monitoring any health and safety measures, procedures, or programs to Golf Sudbury;
4. Request and be provided information from Golf Sudbury about:
 - a. Identifying potential or current hazards involving materials, processes, equipment, and
 - b. Examples of safe work practices and health and safety standards in either similar industries, or businesses that are known to Golf Sudbury.
5. Be provided information by Golf Sudbury about any tests regarding health and safety in the workplace (could be related to machinery, equipment, chemical or physical agent, material, or biological element, etc.);
6. Be present at and be consulted about any testing in the workplace, as necessary.

Co-chair Powers

In the event the committee does not reach a consensus, the co-chair(s) have the power to provide written recommendations to Golf Sudbury. These recommendations shall be responded to within 21 days of their receipt. The response will include when the recommendation will be implemented when Golf Sudbury agrees with the recommendation and reasons why when the recommendation is disagreed with and/or not accepted.

Committee Meetings

The health and safety committee will meet every three months, at minimum. Minutes will be taken at each committee meeting and then retained in the event of an inspection or examination.

Members of the committee are entitled to at least an hour to attend the quarterly meetings as well as paid time in order to complete any work ahead of or following the meeting. Committee members will not be expected to complete this work on their own time and are considered to be working when they are completing health and safety duties.

Inspections

One of the members of the committee will be required to complete monthly health and safety inspections. The committee is required to establish a schedule for the completion of these inspections.

When possible, it should be the certified co-chair who completes the inspection, but the co-chair is not required to complete every inspection. Golf Sudbury will ensure that the member completing the inspection has sufficient time to complete it. These inspections shall be kept on file. In the event that the member requires information and/or assistance in completing the inspection, they shall be provided with it.

If any hazards or dangers are noted during the inspection, the committee member must inform the committee of their findings and the committee must discuss this information as soon as reasonably possible.

In the Event of a Critical Injury or Death

If a critical injury or death occurs, a member will be required to investigate and inspect the place where the accident occurred (including if a machine, device, or thing was involved). Following the inspection, the member is required to present their written findings to Tom Arnott and to the committee.

Golf Sudbury must also provide a written report within 48 hours to the Ministry of Labour, Immigration, Training and Skills Development about the incident.

Posting Committee Members' Names

Golf Sudbury will post the name of the members of the committee, as well as their work departments in an accessible location so that all employees are aware of who is on the committee.

HEALTH AND SAFETY STATEMENT

Golf Sudbury places the health, safety, and well-being of all workers and volunteers as its highest priority. We understand the organization holds the highest responsibility for the safety of the workplace and will take all steps needed to provide a healthy and safe working environment.

Golf Sudbury adheres to the requirements set out in the *Occupational Health and Safety Act*, at a minimum. This includes promoting health, safety, and well-being awareness; providing information, training, and competent supervision to employees about specific work tasks; ensuring employee participation in H&S initiatives; and monitoring safety hazards on an ongoing basis.

However, managers, supervisors, employees, and volunteers are all accountable for working together to always uphold their own health and safety and that of others. Managers and supervisors must train their workers appropriately, make sure working conditions are safe, and monitor that employees are following safe work practices and procedures.

Employees and volunteers must do their part by implementing all safety training and practices of Golf Sudbury; staying vigilant about their environment; and reporting any health or safety concerns to management or the health and safety committee right away. They are also encouraged to participate in health and safety initiatives, at any time.

We must all remain committed to keeping each other safe and healthy in every way possible. At Golf Sudbury, we look forward to working together to do just that.

RIGHT TO REFUSE UNSAFE WORK

Golf Sudbury understands all workers have a right to a safe and healthy working environment. The purpose of this policy is to outline:

- The right to refuse work under the *Occupational Health and Safety Act* (OHSA)
- The workers who have the right to refuse
- The procedure that must be followed in the event of a work refusal

SCOPE

This policy applies to all workers at Golf Sudbury In Ontario, all workers have the right to refuse unsafe work except for workers such as: police officers, firefighters, workers employed in the operation of correctional institutions, and health care workers.

DEFINITIONS

“Worker representative” within this policy means one of the following: a joint health and safety committee member who represents the workers, a safety representative if there is no health and safety committee, or another worker who has been chosen to represent a person who is refusing work

POLICY

Golf Sudbury respects the legal right of employees to refuse work they believe is unsafe and will take the appropriate actions set out by the *Occupational Health and Safety Act* (OHSA).

Employees of Golf Sudbury may refuse any work, workplace condition or equipment they believe might endanger their health and safety, or the health and safety of another person. This right to refuse extends to workers who believe they may be endangered by workplace violence.

When an employee exercises their right to refuse unsafe work, the work refusal process set out by the *Occupational Health and Safety Act* (OHSA) must be followed explicitly. To initiate the work refusal, a worker must only state they feel unsafe and do not wish to proceed with a task or activity.

There will be no negative consequence for employees who exercise their right to refuse in good faith and who adhere to the processes set out by law and in this policy.

Golf Sudbury will continue to pay the worker who is refusing to work at the regular rate during the work refusal process until a Ministry of Labour Inspector rules that it is safe to resume work. If the worker continues to refuse work beyond the point the work has been deemed safe, Golf Sudbury is no longer required to provide pay and may begin disciplinary action.

WORK REFUSAL PROCESS

Under the law, the following procedure must be followed in the event of a work refusal.

Step 1

- The worker reports the refusal to their manager and then stays in a safe place. The worker may also notify the health and safety committee
- The employer or supervisor investigates the issue with the worker and a safety representative or other chosen worker representative present.
 - If an acceptable resolution to the issue is put in place, the worker can go back to work
 - If no resolution is found, move on to Step 2

Step 2

- If the worker continues to feel unsafe, the worker should continue to refuse and stay in a safe place.
- The worker or employer (or someone representing either of them) should call the Ministry of Labour
- A Ministry of Labour Inspector will investigate the issue in consultation with the worker, safety representative and supervisor or management representative
- Any required/ordered changes to improve safety will be made
- The refusing worker will go back to work

During Step 1, if the supervisor has investigated and found a resolution they believe is safe, but the worker continues to refuse, the supervisor can ask another worker to perform the task while waiting for a resolution under Step 2. However, the supervisor must let the second worker know:

- the task they are being asked to do has been refused by another worker
- why the task was refused, and
- that an investigation with the Ministry of Labour is in process

Golf Sudbury understands the second worker may also refuse the work.

WORKPLACE ANTI-HARASSMENT

Golf Sudbury is committed to ensuring a workplace free of harassment, bullying, and discrimination. In pursuit of this, Golf Sudbury will not tolerate any harassment, bullying, or discrimination within the workplace. Golf Sudbury is further committed to investigating any complaints regarding workplace harassment, bullying, and/or discrimination, using the method of progressive discipline, up to and including the point of termination of employment for the perpetrator(s).

Canada's Criminal Code specifically lays out matters such as violent acts, sexual assault, threats, and behaviours such as stalking. In the event of any of the above, Golf Sudbury will immediately contact the police.

DEFINITIONS

Harassment is defined by the *Ontario Occupational Health and Safety Act* as "engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome." This definition includes sexual harassment, personal harassment, psychological harassment, and bullying.

Workplace harassment does not include reasonable actions taken by an employer or supervisor relating to the management or direction of workers in the workplace.

Sexual Harassment under the Occupational Health and Safety Act is defined as: "Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position 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."

Note that this Anti-Harassment Policy is administered in conjunction with Golf Sudbury's Human Rights Policy and includes freedom from discrimination under any of the grounds established by the *Ontario Human Rights Code*, including race, ancestry, place of origin, color, ethnic origin, citizenship, creed (religion), sex (including pregnancy), sexual orientation, gender identity, gender expression, age (18 and over), marital status (including same-sex partners), family status, disability, and record of offenses.

Common harassing behaviors can include (but are not limited to):

- Rumour spreading;
- Jokes about sex;
- Email chains with jokes about specific individuals;
- Excluding individuals from work-related activities;
- Reviewing work unfairly or trivial fault-finding; and
- Belittling behavior or comments.

Harassment can either occur over a period, or in a specific instance, depending on the specific situation.

POLICY

Golf Sudbury encourages any of its employees who witness or who are victim to harassment, bullying, or discrimination to bring forward the information as soon as possible so that an investigation may immediately commence.

In pursuit of a harassment-free environment, Golf Sudbury is committed to fully preventing and/or addressing any instances of harassment, including sexual harassment, by:

- Providing education and training to ensure that all employees understand their rights and responsibilities regarding harassment;
- Ensuring that supervisors understand how to respond to incidents of harassment, including how to collect information, how to act, how to deal with confidentiality, how to document, and how to keep records;
- Methodically monitoring or adjusting Golf Sudbury's systems for any barriers, including any barriers regarding any protected grounds laid out in *the Ontario Human Rights Code* and Golf Sudbury's Human Rights Policy;
- Reviewing their Anti-Harassment program with the Health and Safety Committee
- Providing a procedure for complaints (outlined below) that is fair, timely, and effective; and
- Ensuring to promote appropriate standards of conduct.

This policy also prohibits any person at Golf Sudbury who is able to grant or deny a benefit to another employee from sexually soliciting or making advances on that person. This could include co-worker to co-worker, or supervisors and managers to employees. Further, any reprisals for the rejection of these advances are not permitted.

Golf Sudbury will also not permit the creation of a poisoned work environment, as created by comments or any forms of conduct that are known to be unwelcome. Golf Sudbury will investigate all complaints to prevent this poisoned environment.

In addition, any employees who experience harassment while in the course of work for Golf Sudbury have the right to file a complaint without any fear of reprisal. Golf Sudbury will ensure that an investigation is conducted into any incidents or complaints of workplace harassment, as appropriate.

Employee and Supervisor Responsibilities

All Golf Sudbury employees have the responsibility to adhere to the contents of this policy and refrain from enacting or condoning any form(s) of harassment. Further, all employees have the responsibility of fully cooperating in any investigations into complaints of harassment.

All Golf Sudbury supervisors or managers have an additional responsibility of acting immediately upon either receiving a complaint of harassment or witnessing it themselves. Supervisors and managers are responsible for the creation and maintenance of a harassment-free workplace and must immediately investigate as soon as any forms of harassment become known in the workplace.

COMPLAINT PROCEDURE

At Golf Sudbury, complaints regarding harassment, bullying, or discrimination may be brought forward to:

- Tom Arnott, General Manager, Golf Sudbury at Cedar Green Golf Club, 100 Carr Avenue, Garson, Ontario or via email at tom@golfsudbury.com.
- An alternate report may be made to Polly Yawney at Cedar Green Golf Club, 100 Carr Avenue, Garson, Ontario or via email at polly@golfsudbury.com.
- Immediately upon receipt of a complaint, an investigation will be started, and additional information and context will be sought. The investigation may include:
 - o A review of the details of the incident;
 - o Separate interview(s) with the parties involved and any witnesses;
 - o Examination of any relevant documents, emails, notes, photographs, or video;
 - o A decision about whether the complaint constitutes workplace harassment; and
 - o The preparation of a report that summarizes the incident, the steps of the investigation, the evidence collected, and any findings
- Golf Sudbury will take appropriate measures to ensure that employees and/or witnesses involved in filing the complaint are protected, as necessary. This may include temporary reassignments or shift changes. Golf Sudbury will ensure that these changes do not penalize any employee who brought forward a complaint, or any witness to the complaint.
- Golf Sudbury will not disclose any information regarding a complaint of harassment (including any identifying personal information of any of the individuals involved), unless the disclosure is necessary. The disclosure may become necessary for the purposes of investigating the complaint, taking disciplinary action, or as required by law.
- The employee who disclosed the complaint, as well as the alleged harasser (provided they are both employees of Golf Sudbury), will be kept up to date on the investigation and will be notified of the results of the investigation and any subsequent actions to be taken.

Any reports resulting from an investigation into complaints of harassment, discrimination, or bullying are not considered to be Occupational Health and Safety reports and will not be shared with the safety committee.

Note: This policy will be in written form and posted in a conspicuous place at Golf Sudbury. It will be reviewed as often as necessary, but at least annually.

WORKPLACE ANTI-VIOLENCE

This policy and program are intended to:

- a) Ensure that Golf Sudbury maintains a work environment that is free from workplace violence.
- b) Establish measures and procedures to control the risk of workplace violence.
- c) Communicate the procedure for summoning immediate assistance in the event of an incident of workplace violence or where an incident is imminent.
- d) Establish a procedure for reporting incidents of workplace violence.

- e) Establish how reports of workplace violence will be dealt with and investigated by the organization.

DEFINITIONS

“Workplace Violence” as defined by the *Ontario Occupational Health and Safety Act*, means:

1. The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
2. An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
3. A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

“Workplace” refers to any land, premises, location, or thing at, upon, in or near which a worker works including the organization's offices, off-site locations where work is performed, social events related to work or away from work but resulting from work (i.e., a threatening phone call to your home or other personal electronic contact from co-workers or clients).

POLICY

Golf Sudbury is committed to providing a healthy, safe, and supportive work environment for all employees that is free from workplace violence and will not tolerate any such incidents that are perpetuated by or against an employee, client, volunteer, vendor, or visitor.

In pursuit of this commitment, Golf Sudbury will take all reasonable steps to prevent workplace violence and will deal with incidents and complaints made in good faith, in a fair, consistent, and timely manner.

Employee Responsibilities

- Understand what constitutes workplace violence as defined in this policy and adhere to the organization's zero tolerance requirement.
- Immediately report any incident of violence one is subject to or witnesses in accordance with the organization's anti-violence program.
- Participate as required in internal and external investigations concerning incidents of workplace violence.
- Refrain from any retaliatory acts against any individual who has brought forward a complaint of violence.
- Attend and actively participate in training and education sessions regarding workplace violence.

Employer and Management Responsibilities

- Assess the risk of workplace violence and implement procedures, response plans and other controls to help minimize identified risks.

- Educate and train employees on this policy and program, response plans and other controls established to protect employee health and safety.
- Ensure a copy of this policy is available to all employees.
- Review the Workplace Anti-Violence Policy and Program annually or as often as necessary to properly protect employees from the risk of violence. This policy and program will be reviewed after any violent incident to determine if changes are necessary.
- Take appropriate action(s) upon receipt of a complaint of workplace violence or when aware that workplace violence is occurring.
- Impose appropriate disciplinary measures in response to substantiated claims of workplace violence.

All members of management who are aware, or who ought to reasonably be aware that incidents of workplace violence are occurring or are thought to be occurring are obligated to take appropriate action to stop the offending behaviours and actions, even in the absence of a formal complaint.

WORKPLACE ANTI-VIOLENCE PROGRAM

Reporting Incidents of Workplace Violence

- In the event you are directly affected by, or witness to an act of violence or a threat of violence in the workplace, it is imperative that the incident be reported immediately. Reports are to be made to your direct supervisor, his or her designate or other relevant party.
- For the health and safety of everyone, employees are encouraged to request an informal meeting with their supervisor/manager or their designate to discuss issues concerning or related to workplace violence.
- Employees should also notify their supervisor/manager, or their designate, if any restraining order affecting them is in effect or if they are aware of a non-work-related situation that could result in violence in the workplace including concerns regarding the potential for domestic violence to occur in the workplace.

If you are subject to workplace violence, you also have the option to pursue recourse through the Provincial Police or the Federal Criminal Code.

Summoning Immediate Assistance

- If you require immediate assistance following an act of violence, are being threatened, or consider yourself to be in imminent danger, contact the police/emergency services immediately by dialing “911” and follow department/facility emergency response procedures (where relevant).
- If you are unable to phone 911 right away, you should:
 - Yell for help.
 - If in a vehicle, honk the horn repeatedly, turn on hazard lights and lock all vehicle doors.
 - If possible, use the vehicle’s emergency alarm.
 - Immediately move to a safe location.
 - Contact a manager/supervisor.

Right to Refuse Unsafe Work Due to Workplace Violence

If you believe that you are being endangered by workplace violence, you have the right to refuse to perform the work you deem to be unsafe. If you are refusing to work because of workplace violence, you must immediately report the refusal to your supervisor/manager or their designate.

Once reported, an investigation into the refusal will commence. During the investigation, you must remain in a safe place that is as near to your work location as reasonably possible and must remain available to the investigator for the purpose of the investigation.

History of Violent Behaviour

Under the Ontario Occupational Health and Safety Act, the organization may be required to provide information (including personal information) to its employees about a person with “a history of violent behavior” if:

- a) The employee can reasonably be expected to encounter that person in the course of their work; and
- b) There is a potential risk of workplace violence because of exposure to the individual with a history of violent behavior.

Pursuant to this obligation, if the organization is of the view that there is a risk of workplace violence such that an employee is likely to be exposed to physical injury, information that is deemed reasonably necessary to protect employees from physical injury, including personal information and any known triggers of the individual’s potentially violent behaviours will be communicated.

When disclosing personal information, the organization will limit as much as possible the amount of personal information provided and will not release any medical information that is deemed protected.

Furthermore, the organization will not disclose any information to individuals who are unlikely to encounter the person with a history of violence or to those who are not at risk of physical injury from that person.

Domestic Violence

In the event the organization is aware that domestic violence could likely expose an employee to physical injury in the workplace, it will take every precaution reasonable in the circumstances for the protection of the affected employee(s). In such situations the organization will work with the employee to create a personal support plan which will identify safety measures and procedures for the protection of the individual.

Violence Risk Assessment

Golf Sudbury will conduct a risk assessment of the work environment to identify any issues related to potential violence that may impact the organization and its employees and will institute measures to control those risks.

When conducting the risk assessment, Golf Sudbury will take into consideration specific areas that may contribute to the risk of violence including:

- Working in a community-based setting
- Interaction with the public and/or working with unstable or possibly volatile clients.
- The exchange of money
- Working alone or in small numbers
- Working at night
- Working in a high crime area

As part of its assessment the organization may review records and reports (incident reports, health and safety inspection reports, etc.). The results of the assessment will be provided to the Joint Health and Safety Committee where one exists.

Violence Investigation Procedure

The investigation process will be initiated upon receipt of a formal complaint from an employee or at the discretion of the employer where workplace violence is known or is suspected to be occurring.

The organization will endeavor to complete investigations within 90 calendar days or less once the process has been initiated; unless extenuating circumstances warrant a longer investigation (for example where more than five witnesses must be interviewed or in the event a witness, Complainant or Respondent is unavailable due to illness).

Once initiated, the investigation procedure will generally adhere to the following steps/guidelines:

1. The organization will appoint an internal or external investigator(s) to promptly conduct and document an investigation into the incident in which all facts are examined in a manner that is timely, fair, and impartial.
 - a. No person shall be appointed to the role of an investigator where they have been named within a complaint.
 - b. Any allegations against a department head will be investigated by a neutral third-party investigator.
2. The investigator(s) will review this policy, the submitted complaint and supporting documents, and will meet with the Complainant to gather additional details and information regarding the incident(s).
3. Individual(s) named in the complaint (known as Respondents) will be advised via written notification of the complaint that has been filed against them. The notification will inform the Respondent of the alleged offensive action(s)/behaviour(s) made against them.
4. The investigator will then meet with the Respondent to allow the individual to respond to the presented allegations and to gather facts and information.
5. Where warranted, the organization may issue a paid administrative leave to the Respondent, Complainant and any other party deemed necessary until the investigation is completed.
6. Employees on paid administrative leave pending the results of the investigation must remain available to meet with the investigator and to return to work as requested.
7. The investigator may also individually meet with witnesses and any other individual deemed necessary to provide additional evidence or context/information pertinent to the investigation.
8. Once the investigator is satisfied with the amount of factual information collected from all parties, they will make a determination as to whether or not the allegation(s) are

substantiated based on a balance of probabilities and where substantiated, make recommendations on any remedial action to be taken.

9. The investigator will provide an investigation report which must include a summary of the steps taken during the investigation, the complaint and allegations of the Complainant, the response from the Respondent(s), the evidence of any witnesses, any additional evidence gathered, findings of fact, the conclusion of the investigation and any recommendations made.
10. If the investigator deems a breach of the policy has occurred, the organization will take necessary progressive discipline where deemed appropriate to do so.
11. If the results of the investigation do not substantiate that a breach of this policy has occurred, the allegations will be disregarded in any subsequent employment decision affecting the parties involved. This is the case except where there is repetition of the same allegation from the same or different parties, and in that case, further investigation and progressive discipline may occur. However, if after investigating any complaint the organization determines that the complaint is not genuine or that an employee has deliberately provided false information regarding the complaint, disciplinary action may be taken against the Complainant or the individual who gave the false information.
12. If the Complainant disagrees with the outcome of the investigation, they will have the option to pursue recourse through the applicable legislation (example: The *Human Rights Code* or the *Occupational Health and Safety Act*).
13. Golf Sudbury will provide the Complainant and Respondent (where the Respondent is an employee) with a written outcome letter summarizing the investigation findings and any disciplinary action to be taken because of the investigation.
14. All parties involved in the investigation process, including the Complainants, Respondents, and witnesses are responsible for fully cooperating with the investigator(s) throughout the investigation process.

Prohibition Against Retaliation/Reprisal

Golf Sudbury strictly prohibits any form of retaliation against an employee for filing a genuine complaint under this policy or for participating in the investigation process.

Specifically, no employee shall be demoted, dismissed, disciplined, or denied a promotion, advancement, or other opportunity because they have lodged a complaint in good faith or have participated in an investigation.

Disciplinary Action

Any employee who is found to have breached this policy by engaging in violence or a form of reprisal; who breaches confidentiality expectations; fails to cooperate with an investigation; makes a complaint in bad faith or supplies falsified information will be subject to appropriate disciplinary action.

Disciplinary action may range from training, counselling, written warning, suspension, work transfer and termination of employment, depending on individual circumstances. Additionally, the organization may pursue criminal charges where warranted.

Confidentiality

Golf Sudbury will ensure that information and documents regarding a complaint or incident will not be disclosed except to the extent necessary to protect workers, to investigate the complaint or incident, to take progressive discipline or as otherwise required by law.

All parties involved in a workplace violence complaint, including complainants, respondents, witnesses, managers, and support persons are expected to treat the matter and any information they become aware of as confidential. No party shall discuss the matter or associated details with other employees or witnesses. An employee may face disciplinary action if it is determined that they have failed to adhere to these confidentiality expectations.

All investigation notes and full reports will be retained in a separate file and are not to be saved in employee personnel files. Investigation outcome letters and disciplinary action will be saved in applicable employee files only when the complaint has been verified and is found to be in breach of this policy.

Record Keeping

Golf Sudbury will securely retain records of all complaints or incidents of harassment including copies of:

- The complaint or details about the incident
- Records of the investigation including notes
- Witness statements, if taken
- The investigation report, if any
- Results of the investigation that were provided to the Complaint and Respondent
- Any progressive discipline taken to address the complaint or incident of workplace harassment

Reports of Violent Incidents - Workplace Expectations

The Organization Shall:

- Promptly investigate all reported acts and incidents of violence.
- Consult with other parties (i.e., legal counsel, Health and Safety Consultants, Health and Safety Representatives, Employee Assistance Providers, Human Rights, and local Police Services) as deemed necessary to address, resolve and mitigate incidents.
- Take all reasonable measures to identify and eliminate risks and root causes resulting from the incident.
- Comply with WSIB and OHSA violent incident reporting obligations by:
 - Immediately notifying the Ministry of Labour, and the JHSC (where relevant) of any incident resulting in the death or critical injury of an employee and providing the Director of the Ministry of Labour with a written report detailing the circumstances of the incident within 48 hours of its occurrence.
 - Providing written notification to the JHSC within four days of any violent incident which leaves an employee disabled from performing their job duties or which requires medical attention.
 - Providing notification to the WSIB within 24 hours of any violent incident in which an employee sustains a lost-time injury past the day of the incident or an injury that requires health care.

WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEMS (WHMIS)

Golf Sudbury is committed to protecting the health and safety of its employees and will take all measures needed to safeguard its workers from the hazardous products that are found in the workplace. Golf Sudbury will uphold its duties and responsibilities under WHMIS 2015 to correctly identify and label hazardous products and educate and train its employees.

DEFINITIONS

The following definitions were taken from the Canadian Centre for Occupational Health and Safety.

“Globally Harmonized System of Classification and Labelling of Chemicals (GHS)” – an international system that defines and classifies the hazards of chemical products and communicates health and safety information on labels and SDSs in a standardized way.

“Hazardous product” – a product, mixture, material, or substance that meets the criteria to be classified in one or more of the hazard classes of the HPR.

“Safety Data Sheet (SDS)” – a document that contains specified, required information about a hazardous product, including information related to the hazards associated with any use, handling, or storage of the hazardous product in a workplace.

“WHMIS” – WHMIS stands for Workplace Hazardous Materials Information System. WHMIS is Canada’s national hazard communication system for hazardous products in the workplace. It applies to suppliers, importers, and distributors of hazardous products that are sold in or imported into Canada and intended for use, handling, or storage in Canadian workplaces, as well as to the employers and workers who use those products.

POLICY

Golf Sudbury recognizes the importance that identifying hazardous products in the workplace can have on keeping employees safe. As such, Golf Sudbury will implement Ontario's WHMIS regulations as outlined in the *Occupational Health and Safety Act (OHSA)* and the *Workplace Hazardous Materials Information System Regulation (R.R.O. 1990, Regulation 860)*.

Golf Sudbury will comply with the requirements of WHMIS 2015, the most up-to-date version of WHMIS in Canada, which has been updated to integrate the world-wide labelling standards of the GHS.

Employer Responsibilities

Golf Sudbury recognizes it has certain responsibilities under WHMIS 2015 and will comply with its duties by:

- Providing education and training to all employees who may come into contact with a hazardous product about: WHMIS legislation, how to read labels and safety data sheets, and how different types of hazardous products could affect them negatively.
- Making sure the containers of hazardous products found in the workplace are correctly identified and labeled, using the latest standards
- Ensuring up-to-date Safety Data Sheets (SDSs) are available for workers to find and read

Further, Golf Sudbury will ensure:

- It is aware of the hazardous products in the workplace, how they are used and where they are located or stored
- Keep accurate records about the hazardous products located in the workplace
- Develop procedures for:
 - the safe use, handling, storage, and disposal of hazardous products,
 - how to protect workers (such as utilize personal protective equipment or create specific safety plans where necessary), and
 - what to do in an emergency

Employee Responsibilities

Employees of Golf Sudbury also have responsibilities under WHMIS 2015. Specifically, employees must:

- Complete WHMIS training and education if assigned by the employer
- Follow the instructions and safe work procedures as outlined to protect self and others
- Be familiar with the hazardous products they may come into contact with
- Only use products that have a label *and* that they have received training on
- Understand SDS information and know where SDS sheets are located
- Ask for help if needed and report any concerns to the appropriate member of staff immediately

CONDUCT AND DISCIPLINE POLICIES

ABSENTEEISM AND ATTENDANCE

Golf Sudbury is committed to ensuring that all its employees are appropriately compensated for their hours of work. This Attendance and Absenteeism policy outlines our expectations for employees with regard to their time and attendance.

POLICY

Golf Sudbury employees have the responsibility of attending work at their scheduled time or providing as much notice as possible in the event they are unable to arrive for the start of their shift. Employees are to inform their supervisor by phone and email a minimum of 3 hours prior to their shift if they will

not be present. If employees need to leave their shift early, they must provide as much notice as possible to their supervisor.

Prolonged Absences

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

Job Abandonment

Should an employee miss three (3) consecutive days of work, without reasonable justification and without proper notification to the employer, the employee may be subject to disciplinary action. Upon missing three (3) days of work, conditions as above, the employer will send the employee a registered letter stating the expectation that the employee contact the employer immediately with acceptable justification for their absence; documentation may be required. A deadline to contact the employer, and provide acceptable justification and/or documentation, will be provided (typically 3 business days). Should the employee not contact the employer, and provide acceptable justification and/or documentation, the employee will be terminated, for cause, on the grounds of job abandonment.

Should the employee provide reasonable justification and/or documentation within the prescribed time period, the employer may still discipline the employee accordingly for failure to communicate their absence via the call-in procedure outlined in the Golf Sudbury's *Absenteeism and Attendance* policy.

Absenteeism

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

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

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

Disciplinary Steps

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

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

Each of these steps will be documented and copies will be provided to the employee to read and understand during the disciplinary meeting. For further guidelines on the progressive discipline process, Golf Sudbury will refer to the Progressive Discipline Policy.

CODE OF CONDUCT

Golf Sudbury believes in honesty, integrity, and respect and requires all employees working on behalf of the organization to uphold these values. The purpose of this policy is to outline the organization's expectations when it comes to the behavior and conduct of its employees.

POLICY

Golf Sudbury is committed to doing business in a respectful and ethical manner. Employees of Golf Sudbury are expected to behave in a professional and courteous manner toward the organization, fellow employees, our clients, and the public at all times.

This means employees will adhere to the following guidelines for working with integrity:

- Report for work on time and put their best effort forward each day
- Assist clients and fellow colleagues to the best of their ability
- Take responsibility for their choices and actions
- Treat others with dignity and respect
- Represent the organization and its clients or affiliates in a positive manner
- Keep confidential information private
- Use company resources and property as intended
- Ask for clarification and guidance when unsure about an action or decision

Golf Sudbury will not tolerate:

- Discrimination, harassment, bullying or violence of any kind
- Illegal or criminal behaviour including but not limited to stealing, damaging property, or possessing illegal substances or items
- Any type of lewd behaviour or unethical conduct

- Showing up for work under the influence of any substance that impairs judgement or hinders safety, whether that substance is legal or not
- Insubordination
- Competing with the organization or using company information or intellectual property for personal gain
- Intentionally behaving in any untrustworthy manner such as misrepresenting the company or its products, services, or prices to clients or to the public whether in person or via social media channels

Golf Sudbury will provide education and training to ensure employees understand their obligations and responsibilities when it comes to respectful behavior.

Employees who do not comply with the expectations set out in this code of conduct will be dealt with through progressive discipline, which may include termination of employment.

CONFIDENTIAL COMPANY AND CLIENT INFORMATION

The Confidentiality Policy defines and describes the management of confidential information for all employees of Golf Sudbury. We believe that company and proprietary information and all information relating to Golf Sudbury employees and clients are confidential, and every safeguard should be taken to ensure information is kept confidential. This policy further outlines our commitments to our employees and clients how we will handle this information.

Protecting the privacy and confidentiality of personal information is an important aspect of the way Golf Sudbury conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to Golf Sudbury's daily operations.

SCOPE

Our company relies upon employees and business partners to properly develop, maintain, and operate our systems, networks, and processes which keep our sensitive information safe and properly used. This means that every person and organization handling our information has the responsibility to keep information safe, no matter where the information is located. This includes computing systems, networks, paper copies, business processes, and verbal transmission of information.

POLICY

Company Confidential information

Golf Sudbury requires all employees to handle all personal and business information regarding confidential materials, intellectual and proprietary property, pending business transactions and sales, partnerships, supplier pricing, IT information, access and processes as well as personal, personnel and client information gained through the course of their regular job duties in a confidential and appropriate manner.

Employees agree that if confidential information is not effectively protected, the operations and reputation of Golf Sudbury may be threatened and may suffer irreparably.

All employees shall keep confidential and shall not, during the continuance of their employment or any time after the termination thereof, without the express written consent of Golf Sudbury, disclose to any person or organization any information of Golf Sudbury or its partners to which an employee may have acquired during employment or partnership.

Failure to adhere to this policy may result in disciplinary action up to and including termination of employment.

Client Information

In accordance with the Privacy Act and PIPEDA (Personal Information Protection and Electronic Documents Act), Golf Sudbury requires all employees to handle sensitive personal client information in a confidential and appropriate manner. It is understood that employees of Golf Sudbury will become aware of confidential information regarding our clients through the course of their employment. Employees agree that if confidential information is not effectively protected, the operations of Golf Sudbury may be threatened, and the well-being and privacy of our clients may suffer irreparably. The rules by which information is handled are determined by the regulations, business requirements, and company commitments relating to that type of information. Only the information required to achieve the desired business outcome will be collected and will remain confidential.

Every employee, vendor, contractor, supplier or vendor, agent or representative of our company must be aware of the significance of the information being handled and ensure that proper controls are applied to prevent copying, disclosure, or other misuse of the information.

Employees are required to keep all confidential information, both about the Company and our clients, confidential both during and after their term of employment. Employees shall not divulge, disclose, provide or disseminate confidential or private Information to any third party not employed by Golf Sudbury at any time, unless Golf Sudbury gives written authorization.

Return of Company Property

You agree that all confidential and proprietary information of Golf Sudbury, which includes, but not limited to files, confidential information, spreadsheets, proprietary information, client information and other documents or papers (and all copies thereof) relating to the Company, including such items stored in computer memories, computer disks or by any other means, made or compiled by or on your behalf during your employment, or made available to you relating to the Company or any affiliate of the Company, shall remain the property of the Company, and shall be delivered, along with any copies thereof, to the Company promptly upon the termination of your employment with the Company for any reason whatsoever or at any other time upon request and you confirm that you shall not keep any reproductions thereof.

Consequences

Failure to adhere to this policy may result in disciplinary action up to and including termination of employment.

DRUGS AND ALCOHOL IN THE WORKPLACE

Golf Sudbury recognizes impairment as a serious health and safety issue in the workplace as it can reduce the abilities and judgment of employees. We also recognize that substance abuse and dependency are medical issues that certain employees may struggle with. Golf Sudbury is therefore committed to:

1. Creating a safe and healthy workplace by prohibiting the unsafe use of drugs and alcohol in the workplace; and
2. Providing support to any employees with dependency issues.

DEFINITIONS

Medical Marijuana: Cannabis that is used for a medical purpose. The *Ontario Human Rights Code* “protects people who use cannabis for a medical purpose related to a disability from discriminatory treatment in employment”.

Substance Abuse: The *Code* also prohibits discrimination against people who have or are perceived to have an addiction to drugs or alcohol [including cannabis] based on the ground of disability.

POLICY

To protect our organization, employees, clients, and the public at large, Golf Sudbury prohibits the use of any substances that lead to impairment such as drugs or alcohol, whether legal or illegal, while in the workplace or representing Golf Sudbury, unless they have been authorized in writing for use by management for medical reasons or in special circumstances such as a company event.

Employees may not be impaired while working, whether on-site, off-site or while working from home. Employees who are unfit to report to work for any reason should notify their supervisor using their regular process. Safety is our number one priority at Golf Sudbury.

Employees who fail to comply with this policy may face disciplinary action, including termination, or the involvement of the authorities, where necessary.

Safety Concerns with Machinery or Equipment

Driving or operating machinery, including work vehicles, while under the influence is also strictly prohibited.

Should an employee who operates machinery or equipment, including company vehicles, report to work and inform their supervisor/manager of their current state of impairment, their supervisor or manager is required to take immediate action, which may include sending the employee home in a taxicab or other commercial vehicle, and pursuing disciplinary action at a later date when the employee is no longer impaired.

Solicitation or Possession of Illegal Substances

Solicitation, or possession of illegal substances within the workplace is strictly prohibited at all times. There are no exceptions to this rule.

Work Events

Certain work situations (work parties, events, etc.) may allow for consumption of legal substances. These exceptions to company policy will be communicated by management and employees will be expected to use appropriate judgement and reasonable consumption levels while in these situations.

Duty to Accommodate

Golf Sudbury is committed to providing disability-related accommodation up to the point of undue hardship to employees who come forward with an addiction issue, or to employees who require cannabis for a medical purpose related to a disability under *Ontario's Human Rights Code*.

Employees with substance abuse or dependency concerns are encouraged to share these challenges with their manager/supervisor or HR team member so proper and appropriate accommodations can be organized. They may do so without fear of negative consequences. All employee medical information will be treated as confidential.

Medical Use of Cannabis

As per the *Ontario Human Rights Code*: "An employee can consume edible cannabis for a medical purpose related to a disability in an enclosed workplace, as long as it does not interfere with workplace health and safety or performing essential job duties."

In accordance with smoking and human rights laws:

- Employees may not smoke or vape cannabis for a medical purpose related to a disability in places where laws or rules prohibit smoking or vaping cannabis and tobacco for public health reasons. For example: "Ontario prohibits smoking or vaping cannabis for a recreational or medical purpose in an enclosed workplace".
- Where there is medical need to smoke or vape cannabis, Golf Sudbury will allow an employee who smokes cannabis for a medical purpose to smoke outside in places where smoking is permitted by law.

Employee Responsibilities

Employees are responsible for:

- Following the procedures outlined in this policy
- Informing their supervisor/manager in the event they are under medical care and require the use of a prescription drug which may impair their abilities
 - Employees are not to share their diagnosis or prognosis with the supervisor/manager; the information regarding their medication is precautionary only
- Employees must also inform their supervisor/manager in the event they arrive at work impaired
- If an employee should observe the suspected impairment of another employee, they have a responsibility for informing their supervisor/manager to ensure the health and safety of all others attending the workplace
- Using their judgement in the case of work events, either taking place off-site or at Golf Sudbury's premises

Supervisor/Manager Responsibilities

First and foremost, where a manager or supervisor "observes or otherwise obtains knowledge of a worker's impairment that could give rise to a hazard in the workplace the supervisor is required to communicate this to any worker that may be in danger and to take every precaution reasonable in the circumstances for the protection of the worker(s)." (Ontario Ministry of Labour)

Supervisors/Managers are also responsible for:

- Informing employees about and enforcing the company's drug and alcohol policy
- Ensuring employees under their direct supervision are fit for work
- Alerting the authorities should an employee attempt to drive while under the influence of a legal or illegal substance
- Providing job accommodation to employees who require it
- Providing clear instructions to employees for special events such as company parties to ensure employees clearly understand what they are and are not allowed to do

Suspicion of Impairment

Golf Sudbury will provide training to supervisors and workers on the impact of impairment and on how to recognize and respond to possible signs of impairment.

This includes the use of the Suspicion of Impairment checklist and then follow-up actions with the employee who is suspected of being impaired.

Follow-up actions may include:

- Ensuring that the employee is returned to their home

Additional actions may include drug and alcohol testing, administrative leaves or suspensions, and agreements for counseling as appropriate under human rights and employment legislation. Each situation will be assessed individually.

DRUGS AND ALCOHOL REASONABLE SUSPICION CHECKLIST

Name of Observed Employee	Date	Time (am/pm)
Location		

When there is reasonable suspicion that an employee at work is unfit for duty, the supervisor or manager observing the behavior as well as another supervisor/manager as witness, if possible, must complete the checklist below. Where "Other" is checked, please describe.

Observation Checklist								
Walking	Yes	No		Yes	No		Yes	No
Holding on			Stumbling			Unable to walk		
Unsteady			Staggering			Swaying		
Falling			Other					
Standing	Yes	No		Yes	No		Yes	No
Swaying			Feet wide apart			Unable to stand		
Rigid			Staggering			Sagging at knees		
Other								
Speech	Yes	No		Yes	No		Yes	No
Whispering			Slurred			Shouting		
Incoherent			Slobbering			Silent		
Rambling			Mute			Slow		
Other								
Demeanor	Yes	No		Yes	No		Yes	No

Cooperative			Calm			Talkative		
Sarcastic			Sleepy			Polite		
Crying			Sleeping on job			Argumentative		
Other								
Actions	Yes	No		Yes	No		Yes	No
Hostile			Fighting			Profanity		
Drowsy			Threatening			Hyperactive		

Eyes	Yes	No		Yes	No		Yes	No
Bloodshot			Watery			Droopy		
Dilated			Glassy			Closed		
Other								
Face	Yes	No		Yes	No		Yes	No
Flushed			Pale			Sweaty		
Other								
Appearance/Clothing	Yes	No		Yes	No		Yes	No
Neat			Unruly			Messy		
Dirty			Stains on clothing			Having odor		
Partially dressed			Bodily excrement stains					
Other								
Breath	Yes	No		Yes	No		Yes	No
No alcoholic odor			Faint alcoholic odor			Alcoholic odor		
No cannabis or drug order			Smell of cannabis			Smell of another known drug		

Other								
Movements	Yes	No		Yes	No		Yes	No
Fumbling			Jerky			Nervous		
Other								

☐ Presence of alcohol and/or drugs in the associate's possession or vicinity

☐ On-the-job misconduct by employee

☐ Employee admission concerning alcohol use and/or drug use or possession

If there are witnesses to the employee's conduct list:

Other observations: (if accident, provide details)
Employee's explanation of reasons for their conduct:

Once the above portion of form has been completed by you and a witness, you are now ready to take a position with the employee. Be certain to follow company procedures as outlined in Golf Sudbury's Drug and Alcohol Policy.

(Check one)

☐ Employee has agreed to testing

☐ Employee has not agreed to testing

Supervisor/Manager Signature	Date
------------------------------	------

Witness Signature	Date
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PERFORMANCE ASSESSMENT

Golf Sudbury maintains a policy of assessing the performance of its staff on an annualized cyclical basis. The purpose of the performance assessment is to:

- discuss job responsibilities and evaluate success in meeting job requirements; ·
- discuss strengths and opportunities for development; and
- set standards and performance measures for the coming year.

The program includes the following elements:

- manage employees' professional and personal aspirations, their personal development and align them with the business needs of Golf Sudbury;
- monitoring the performance of the employee during the review period (year);
- performance reviews at the end of the annual cycle.

Performance Objectives and Personal Development Plan

- At the beginning of each performance assessment year, each staff member should discuss their performance objectives with their manager.
- The results of these discussions should be documented and added to the employee's file.
- The purpose of the personal objectives and personal development plan is to align the personal career aspirations and skills development of the employee with the needs of Golf Sudbury.
- Our performance reviews are conducted on an annual cycle or as often as the management team deems necessary.

Managers/leaders should provide concrete examples of the employee's performance to support the assessment scores.

The employee's performance will be evaluated throughout the period of employment. If necessary, Golf Sudbury will administer and enforce disciplinary measures in accordance with the Progressive Discipline Policy, in the hope that the employee can be coached to make the necessary improvements.

PROGRESSIVE DISCIPLINE

Golf Sudbury is committed to ensuring that the issuance of informal and formal discipline for employees is facilitated in a respectful manner and via an established process. Golf Sudbury has created this progressive discipline policy to outline the steps that would be taken in the case the conduct or behaviour of an employee is worthy of or in need of correction.

This process is designed to alert employees to conduct or behaviours that have been deemed unacceptable and require correction. It is the goal of Golf Sudbury that those responsible to facilitate the steps outlined in this policy do so with the aim of encouraging the employee to conduct

themselves appropriately and satisfactorily. And our employees, in turn, will then take advantage of the opportunity. The Progressive Discipline Policy outlines the framework for addressing inappropriate behaviours within the workplace and ensuring a fair and consistent approach is in place to address situations quickly.

SCOPE

The terms of this policy apply to all employees of Golf Sudbury. Those employees who are both subject to the terms of the policy as well as responsible for administering and facilitating the policy are expected to adhere to this policy's application as outlined (i.e. human resources, managers and supervisors).

POLICY

This policy outlines a fair and consistent approach to discipline within the workplace in the event that Golf Sudbury sees conflicting behaviours in the desired workplace atmosphere. Golf Sudbury is committed to addressing these situations promptly and appropriately following these guidelines. The policy applies to all employees of Golf Sudbury and employees will be made aware of this policy at the time of hire.

Progressive Discipline Process

This process was designed to provide a step by step guideline to attempt to correct the conduct and behaviours of employees who do the following, but not limited to:

- Violate company policy;
- Violate health and safety rules and procedures, including workplace violence or harassment;
- Act in manner that is not acceptable or ought to have reasonably been known to be unacceptable;
- Serious performance concerns; or
- Serious infractions that may result in the employee receiving more severe discipline or be terminated with cause.

Progressive Discipline Steps

1. Counselling – Non-punitive^{*1}
2. First Written Warning
3. Second Written Warning
4. Final Written Warning and Possible Suspension without Pay
5. Termination with Cause

Severity of Act and Corresponding Discipline

Not all improper conduct and behaviour is of the same severity. The discipline must suit the circumstance.

Certain actions, in isolation, will not warrant formal discipline. However, the culmination of similar actions may in fact result in discipline as per the terms of this policy. For example, an employee who is late one or two times over the course a few months may not warrant discipline. If the same employee was warned regarding their tardiness and was late a few more times over the next month, the employee may be subject to discipline.

On the other hand, a specific action may be considered relatively more severe than other improper actions worthy of discipline. In these cases, the employer reserves the right to issue a more severe discipline, as per the steps in this policy, or may terminate the employee (see Auto Termination section). For example, an employee is involved in an argument with another employee and punches the employee. The employer is obligated to respond accordingly which means providing an appropriate level of discipline. The employee may be disciplined at Steps 2, 3 or 4 of the process for this single incident, even though no formal discipline existed prior.

Supervisors and managers should consult with human resources before determining and issuing discipline to ensure the discipline provided suits the circumstances. Moreover, it is important to ensure consistency and equity in the issuance of discipline from one employee to another.

Documentation

In all 5 steps of the progressive discipline process, a letter will be drafted by the employer, or representative, outlining the action that was the cause for the discipline, the disciplinary step taken, expectations the employee must meet to improve and the next step in the discipline process should further discipline be required. In stage 1, the letter should clearly indicate the disciplinary measure is non-punitive.

This letter will be dated and signed by the employer. A copy will be provided to the employee receiving the discipline and a copy will be placed in the employees' personnel file. The letter will be removed from the employee's file 18 months after the date of issuance, provided the employee is free from further discipline in those 18 months. Upon each discipline, the 18-month time period begins anew for existing, active discipline on file.

Investigations

Wherever it deemed necessary, the employer will investigate incidents of misconduct or improper behaviour which may result in discipline. During the investigation the employer will make the choice to either keep the employee under investigation in the workplace as well as any other employees that may be victim to or associated with the incident. The employer reserves the right to temporarily move, transfer, or modify the workplace and/or duties of the employee under investigation if said modifications are required for health and safety reasons, the safety of any employee, or to ensure fairness in the investigation. In a case where the employee must be removed entirely from the workplace, the employer may suspend the employee with pay pending the outcome of the investigation. A suspension with pay and/or a modification to the employees' workplace or duties are non-punitive actions and in no way imply guilt.

Suspension Without Pay

In the case of a serious offense or when an employee reaches stage 4 in this process, 'Final Written Warning,' the employer reserves the right to suspend the employee without pay. All suspensions will be provided to the employee in writing, inclusive in the final written warning. Suspensions will last a duration of one (1) business day but no longer than (3) days. Upon return to work from suspension, the employee will meet with the employer to outline the required steps to improve and again be made aware of the consequences if further discipline is required. The employer reserves the right to repeat this stage if it is determined that moving to the next step, termination with cause, is not warranted.

Termination with Cause

In the case of an employee who has progressed through all the steps as outlined in this policy, the employer may terminate the employee with cause. The employer should outline the reasons for the termination and provide a summary of dates and prior disciplines which culminated into a termination. The employer reserves the right to terminate without cause.

Auto Termination

At any point in the employment relationship, should the employee commit a serious act or violation, the employer may immediately proceed to termination with cause. The steps of this progressive process may not need to be followed. The employer reserves the right to terminate without cause. Examples of when immediate termination with cause may be just are as follows, but not limited to:

- Gross misconduct or insubordination;
- Sexual harassment;
- Discrimination, workplace violence or harassment;
- Theft;
- Misappropriation of funds;
- Falsification of records;
- Illegal, violent, or unsafe actions;
- Purposely slander, libel, or defame the organization, including by using social media.

Responsibilities

Employees

Employees must:

- Ensure they understand and fulfill work expectations;
- Ask management for help in the event they do not understand what is expected of their performance in the workplace;
- Consistently act in a respectful manner towards colleagues, superiors, and clients;
- Adhere to Golf Sudbury's policies and procedures; and
- Follow all health and safety measures put in place within the workplace.

Managers

Managers must:

- Ensure employees are aware of all workplace expectations for conduct and performance;
- Manage employees effectively, providing ongoing and constructive feedback on work performance and workplace conduct;
- Ensure employees are aware of and then consistently enforce workplace policies and procedures;
- Follow and enforce the Progressive Discipline Policy with respect to employee performance and workplace concerns; and
- Maintain appropriate documentation for disciplinary actions.

Appeals

Where an employee feels they have been unfairly disciplined under the progressive discipline framework, they may appeal the decision within 30 days of the disciplinary meeting. Employees must provide solid evidence of the unfair disciplinary measures enacted or provide proof that the concern being disciplined for did not occur as described. Management will review all appeals within a timely manner and provide the employee with a written response to the appeal, including the outcome of the appeal.

SOCIAL MEDIA

Golf Sudbury strives to maintain a positive image on our social media platforms. We are committed to preventing any harm to the organization, its employees, clients, or other involved parties that can arise if social media channels are misused, misrepresented, or abused in a way. The purpose of this policy is to outline the expectations we have of our employees when it comes to social media use that is associated with our organization.

DEFINITIONS

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

POLICY

Golf Sudbury is very thoughtful about its branding. The organization and its employees must work together to ensure Golf Sudbury is represented in a positive manner on social media. As such, only designated representatives are permitted to speak on behalf of Golf Sudbury on social media.

Employees who link themselves to Golf Sudbury on social media by commenting on or about or liking or sharing information regarding Golf Sudbury, must use professionalism and respect.

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

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

Non-Compliance

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

USE OF TECHNOLOGY

Employees are expected to use company computers, email, technology and access the internet for employment purposes only. Employment purposes refers to duties required as outlined in the employment agreement, job description or as directed by the organization. Limited, occasional or incidental use of the organization's network for personal activities are acceptable, provided the privilege is not abused.

Employees may use company computers, technology and access the internet for appropriate personal use on designated breaks, lunch and off-work times. Any activity that reflects negatively on the organization, poses a danger to the equipment, organization, or others or conflicts with other company policies will not be permitted.

Restricted comments and/or behaviours may lead to discipline, up to and including termination, and could lead to criminal or civil action against an employee.

Employees are responsible for the use and security of the company computer, including email accounts, and/or technology assigned to them. Employees should use appropriate passwords and protections and ensure their computer is secured when unattended.

Restricted Use – Company Computers, Email and Internet

- Any personal use during work time, including personal emails, unless otherwise authorized to do so.
- Internet sites which are deemed to be inappropriate will not be permitted to be accessed and will be subject to discipline. Examples, pornographic websites, blocked websites, potentially harmful websites, etc.
- Company email must only be used for employment purposes. Emails will only be sent or received to and from people as required for employment purposes.
- Company email is subject to the organizations' policies: *Workplace Violence, Harassment and Discrimination, Appropriate Workplace Conduct and Confidentiality*.
- If an inappropriate email or link is received, it must be deleted immediately, and the email must be reported if sent internally. If the email is forwarded you will be subject to appropriate discipline.
- Downloading files, music, videos, pictures, etc. not required for employment purposes.
- Conducting unapproved business for any alternate sources of employment, compensated or otherwise, or for any home-based business at any time.
- Shall not install or run security programs or utilities unless specifically instructed to do so.
- Employees must comply with copyright and licensing restrictions on any information which has been downloaded or is protected by the organization.
- Employees are prohibited from using protected materials (copyright material, branding and/or logo(s) without prior express written permission.
- Allowing others who are not authorized users to access and utilize company equipment or software.

Please note: The employer reserves the right to monitor employee company emails and computer use, which includes internet use.

WORKING FROM HOME

Some employees of Golf Sudbury participate in remote work or working from home arrangements. The intention of this policy is to outline parameters of working at home to ensure safety and success for both the employee and the organization.

DEFINITIONS

“Remote work” means working from a home or from another location rather than being required to go to the physical workplace or the employer.

“Intellectual property” includes intangible creations of the human intellect such as copyrights, patents, trademarks, and trade secrets. For the purposes of this policy, it also refers to any content, project or idea created for the employer by an employee.

POLICY

Golf Sudbury understands the unique challenges and benefits faced by the organization and our employees when employees are working from home. Golf Sudbury has safeguards in place to ensure the safety and well-being of our employees and the protection of company and client information.

Employees may only work from home with prior approval of their supervisor or manager.

Formal and/or Hybrid Working from Home Arrangements

Golf Sudbury may provide the employee the option to either work from home full-time or work in a hybrid model, both from home and work. The opportunity provided by the employer is temporary and will be reviewed on a regular basis. In no way does a full-time working from home or hybrid schedule form a basis, expectation, or condition under the employee's employment agreement. The employer reserves the right to amend your schedule, place of work and/or require you to return to work full time at any time and reason at the sole discretion of the employer.

Employer Responsibilities

- Provide relevant health and safety information and plans to ensure the employee's safety while working from home including but not limited to ergonomic safety, fire safety, and working alone, and ensure employees are following these expectations
- Set clear expectations surrounding duties, expectations, and deadlines as well as the importance of taking scheduled breaks
- Provide the necessary information and equipment the employee requires to complete their duties and maintain client and company information safely and confidentiality

Employee Responsibilities

Employees are expected to:

- Be working during the times set out in their employment contract, taking breaks as outlined
- Maintain contact with the office and keep managers informed about the status of projects and any issues that arise
- Behave in a professional, respectful, and courteous manner at all times when representing the organization, whether by phone, email, or any other internet platform or communication channel
- Follow the health and safety guidelines provided from the employer for setting up a safe working environment at home including but not limited to office ergonomics, fire and electrical safety, and violence and harassment
- Immediately report any health and safety accident or incident to the employer, just as they would at the office so that it can be followed up on and investigated as required
- Ensure all computers, devices and operating systems are set up according to the specifications of Golf Sudbury
- Ensure all confidential or proprietary information is secured using appropriate online security features such as closed internet connections, firewalls or encryption, or in locked filing cabinets. Employees must report any security breaches to their supervisor immediately

- Ensure all physical property loaned by the company is maintained in good working order and notify management immediately in the event any equipment is broken, damaged, lost or stolen

All property of Golf Sudbury, including physical property and intellectual property, remains the property of the organization and must be returned to Golf Sudbury at the end of the working from home arrangement or the end of the employment relationship, whichever occurs first.

Any employee who fails to comply with the responsibilities outlined in this policy may have their working from home privileges revoked, or be subject to disciplinary action, including termination of employment.

ACKNOWLEDGMENT

My signature below indicates that I have received a copy of Golf Sudbury's Policy Manual.

I acknowledge that I have read and understood the policies and procedures outlined within this manual.

I also understand that Golf Sudbury may revise, supplement, or rescind policies, procedures or benefits described in the manual, with or without notice.

I further understand that this manual does not supersede any employment legislation and in the case of a conflict between a policy and the legislation, the legislation shall prevail.

I understand that I must contact my manager/supervisor if I have any questions or do not understand the contents of any of these policies as I am required to follow their guidelines.

Signed,

Print Name: _____

Signature: _____

Date: _____

