



Employee Handbook

Version 2.0

Effective Date: January 14, 2026

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1. Welcome and Purpose

This handbook provides an overview of employment expectations and workplace policies at U2 Fasteners.

2. Employment Policy

Employment terms, compensation, hours of work, and leave entitlements are governed by the Employment Policy.

3. Hours of Work, Pay, and Leaves

Hours of work, overtime, sick leave, vacation, and statutory leaves comply with applicable legislation.

4. Progressive Discipline

U2 Fasteners may use progressive discipline, including verbal warnings, written warnings, suspension, or termination, depending on circumstances.

5. Confidentiality and Company Property

Employees must protect confidential information and use company property responsibly at all times, both during and after employment.

Confidential Information

Confidential information includes, but is not limited to, customer and supplier information, pricing, product designs, technical data, business plans, internal processes, personal information, and any other non-public information obtained through employment. Employees must not disclose, misuse, or access confidential information except as required to perform their job duties.

Company Property

Company property includes all physical and electronic assets such as equipment, tools, documents, records, keys, access cards, key fobs, passwords, systems, files, software, and data. All company property must be used for legitimate business purposes and must be returned immediately upon request or at the end of employment.

Employees should have no expectation of privacy when using U2 Fasteners' systems, equipment, networks, or devices, subject to applicable law.

Privacy and Personal Information

Employees who handle personal information as part of their role must comply with U2 Fasteners' **Privacy Program & Handbook**, as amended from time to time. This includes obligations relating to the collection, use, safeguarding, retention, and

disclosure of personal information, as well as the prompt reporting of any privacy or confidentiality incidents.

The Privacy Program & Handbook is maintained as a standalone document and forms part of U2 Fasteners' overall policy framework.

Failure to comply with this section or any related confidentiality or privacy requirements may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

All company property must be returned upon request or at the end of employment.

6. Health and Safety

U2 Fasteners is committed to a safe workplace. Employees must follow the Health and Safety Policy and all supporting safety policies.

7. Workplace Conduct and Security

Professional conduct is expected at all times. Policies addressing harassment, violence, unauthorized persons, and video surveillance apply.

8. Employee Acknowledgment

Employees are required to acknowledge receipt and understanding of this handbook and related policies.

POLICY STATEMENT:

U2 Fasteners recognizes that its employees are the most critical corporate resource.

As goals, U2 Fasteners strives to:

- * create / maintain a **positive workplace** with open communications, effective practices, and a strong, caring culture that respects the rights of everyone
- * recruit, train, mentor, monitor, and retain the **best employees** for the business
- * ensure that employees understand their **employment contract** and are **compensated fairly** and in a **timely** fashion
- * provide **benefits and sick leave** as outlined below.

Where any provision of this policy conflicts with the Employment Standards Act (Ontario) or other applicable legislation, the legislation shall prevail.

The "Employment Standards in Ontario" poster <https://files.ontario.ca/mltsd-employment-standards-poster-en-2020-09-08.pdf> is posted in the workplace. Basic standards relating to public holidays, hours of work and overtime, termination notice and pay, vacation time and pay, leaves of absence, and minimum wage are outlined on this poster. The rest of this document builds upon these rules.

1. PAYROLL MANAGEMENT / ORGANIZATION STRUCTURE:

For payroll purposes, management includes: Executive Chair, CEO, VP Corporate, VP Sales and Marketing, Office Manager, and Warehouse Manager. In very general terms:

- The Executive Chair and CEO report to the Board
- The VP's report to the CEO
- Office Staff report to the Office Manager
- Warehouse Staff report to the Warehouse Manager
- Outside Sales and Marketing Staff report to the VP of Sales and Marketing
- Accounting and I.T. staff report to the VP Corporate
- Senior management consists of: Executive Chair, CEO, and the VP's. Any member of senior management may act in place of another in the absence of a senior manager.
- Payroll management is the senior management group plus the Financial Consultant

- Payroll is administered by the Financial Consultant under the direction and oversight of senior management. Payroll policy (and this document) is the responsibility of senior management.

2. HOURS OF WORK:

Exclusive of Statutory Holidays, Regular hours of work are:

Monday – Friday
8:30 am to 5:00 pm

(average paid hours per day: excl. 30 minute lunch hour = 8 hours per day = 40 hours per week)

- * daily, two 10 minute coffee breaks are paid by U2
- * regular business hours: employees must be available to come to the workplace during regular work hours
- * “work at the premises” hours: employees may be in the workplace between 7:30 am and 6:00 pm weekdays (see below)
- * for some special tasks / responsibilities, occasional weekend (Saturday, Sunday) work on premises may be required (e.g., receiving a container in the warehouse, I.T. procedures that must be performed off hours, etc.). Senior management permission will be required for these times.

Those who work from home must be available during regular business hours, but will likely work outside of the regular hours of work also. Salaried and contract employees may work from home whatever hours are needed to do the essential tasks assigned to them, on time.

Hours of work will not exceed Employment Standards Act limits except where permitted by law and pre-approved by management, or in exceptional circumstances (emergencies, equipment failure, fire, flood, etc.).

“Work at the premises” shall be between 7:30 am and 6:00 pm daily. Hours outside of these times, must be pre-approved by senior management, and nobody should work alone outside of the “work at the premises hours”. This rule is in place so that in an emergency, another U2 worker will be on premises to deal with the emergency.

Annually, Physical Inventory is counted in November (Thursday and (if required) Friday of American Thanksgiving weekend). All staff are expected to be available for annual physical

inventory unless they are on an approved protected leave or have received prior approval from senior management.

3. OVERTIME:

Where permitted by law and the employee's employment agreement, U2 Fasteners may require overtime work. All overtime must be pre-approved by the employee's supervisor or manager. Overtime for hourly employees begins after 44 hours worked in a week, up to a maximum of 48 hours per week, unless otherwise permitted under the Employment Standards Act. Overtime is paid at one and one-half times the employee's regular rate of pay.

Salaried employees should consult their employment contract or job description for details regarding overtime eligibility, tracking, or compensation.

Overtime hours may be banked for paid time off only where a written overtime agreement is in place, in accordance with the Employment Standards Act. Banked overtime is limited to a maximum of one week and must be taken within the current calendar year unless otherwise required by law. Banked overtime and time off (paid at the employee's normal rate) must be pre-approved by the employee's supervisor / manager, and reported to Payroll prior to the payroll run.

5. LUNCH:

Lunch time should be taken between 11:30am and 1:30pm.

A minimum of ½ hour and up to 1 hour maximum lunch break is required per day.

Taking at least a ½ hour (30 minutes) lunch per day is **mandatory**.

If you don't take a lunch, ½ hour (30 minutes) will be automatically deducted from your timesheet in accordance with ESA requirements.

If you leave work early (before 2:00pm), you can choose not to go to lunch.

Inform the Office and your manager immediately when you come to work, if you decide not to take lunch on a given day.

If you leave work **after** 2:00pm, taking lunch is still mandatory. Those who work from home are encouraged to take breaks similar to those taken at the workplace.

6. TIME SHEETS:

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In lieu of detailed timesheets, each hourly employee is responsible for recording their hours of work on the calendar posted in the workplace for this purpose. (*Exceptions include: salaried-staff (no timesheet required) and staff who work from home – e.g., a Marketing person – who submits a detailed timesheet via email*). Falsification or misrepresentation of hours worked may result in disciplinary action. On the work day closest to the 15th day of each month, and on the last workday of each month, Managers are responsible for verifying that the hours of work are represented fairly and accurately. The Office Manager or designate transcribes this information into a pay-day spreadsheet and sends this information to Payroll at or before the end of work on pay days. Employees are responsible for checking that their remittance stub is paying the correct number of hours, and reporting discrepancies to Payroll.

Hourly employees working from home must have overtime pre-approved by their supervisor / manager before including hours on submitted timesheets.

In future, when the number of employees merits, a punch clock system or non-touch equivalent of some sort will be acquired and used. Once this system is in place, employees will be required to always punch IN and OUT when entering or leaving the workplace, and this policy will be amended at that time.

7. SICK LEAVE:

The Ontario Employment Standards Act, 2000 (<https://ontario.ca/laws/statute/00e41>) has sections that deal with several types of leaves – each with their own rules. The following chart is an attempt to list the types of leaves and some of the rules that apply to each. The Act must be read and applied in all cases.

Leave Type	Paid/UnPaid	Duration (up to)
Sick	Unpaid* (see U2 rules)	2 – 5 days / year
Pregnancy	Unpaid	17 weeks
Parental	Unpaid	61 weeks
Placement of a Child	Unpaid	16 weeks
Family medical	Unpaid	28 weeks
Organ donor	Unpaid	13 weeks
Family caregiver	Unpaid	8 weeks per individual
Critical illness	Unpaid	37 weeks, renewable
Child Death	Unpaid	104 weeks
Crime-related Child Disappearance	Unpaid	104 weeks

Domestic or Sexual Violence	First 5 days paid, then unpaid	10 days / 15 weeks
Long term	Dependent on circumstances	27 weeks, renewable
Family responsibility	Unpaid	3 days / year
Bereavement	Unpaid* (see U2 rules)	2 days
Emergency (see the Act)	Unpaid, exceptions exist (3 days for some situations)	3+ (depending on circumstances)
Reservist	Unpaid	Varies...
Job seeking	Unpaid	3 days

U2 Fasteners goes beyond minimal sick leave provisions as follows.

1. On completion of 1 year of service, U2 Fasteners will pay up to 5 (8 hour) days in salary for **approved** sick days.
2. **Sick days do not accumulate.** On January 1, of each year, a new entitlement of 5 days is awarded.
3. Employees may be required to provide reasonable evidence of entitlement to paid sick days, consistent with the Employment Standards Act. Medical notes will not be routinely required. (Sick days include an employee's illness or a family member illness.)
4. **Sick days must not be treated as extra holidays.** Approval for taking a paid sick day is different than the approval required for vacation days. The purpose of a paid sick day is to discourage employees from attending the workplace when they are ill – essentially removing the financial penalty of staying at home when ill. This is especially important in the case of infectious diseases! **There is a provision for managers to request additional sick days for employees who are self-isolating, or who are facing serious health care issues and require absences for testing or treatment.**
5. If an employee is **sent home** by their supervisor / manager, U2 will pay the rest of the day and deduct these hours from the 5 day – sick leave allotment.
6. When an employee's **sick day entitlement for the year is exhausted**, employees will be given the option of taking holidays instead of unpaid days.
7. In the event of a **conflict between an employee and their supervisor(s)**, employees may also speak to their supervisor's supervisor and / or the President / CEO of U2 Fasteners to resolve the conflict.

8. U2 will keep **records of paid and unpaid sick days** for each employee. These will be shared with each employee in January of each year, and as requested.

9. When **both sick day and holiday entitlements are exhausted for the year**, a meeting will be held with the employee to identify a best course of action (e.g., modified work, other)

10. In many cases, an ROE (**Record of Employment**) may be issued to allow the employee to apply for EI (Employment Insurance) benefits.

11. U2 management prides itself on being a **compassionate employer** and realizes that each case is different. Management reserves the right to take extraordinary action on a case-by-case basis.

It is also recognized that other forms of unpaid leave (such as those listed above) are covered by Ontario employment standards.

However, U2 Fasteners also has rules / policies related to some of the other types of leaves – as follows.

8. PARENTAL / PREGNANCY / MATERNITY LEAVE

Please refer to <http://ontario.ca/document/your-guide-employment-standards-act-0/pregnancy-and-parental-leave>

Provided an employee commenced work at least 13 weeks before the date the baby is expected to be born, and provided at least 2 weeks written notice has been submitted by the employee, the rules for this include:

- * up to 17 weeks of unpaid pregnancy leave may be taken
- * new parents are entitled to take up to 61 weeks of unpaid parental leave when a child is born or taken into their care (adoption).
- * mothers who do not take pregnancy leave and all other new parents are entitled to take up to 63 weeks of unpaid parental leave
- * The **Employment Insurance Act** provides eligible employees with **maternity and/or parental benefits** that may be payable to them during the period they are taking “Employment Standards Act leave”. At this writing, <http://canada.ca/en/services/benefits/ei/ei-maternity-parental.html> suggests eligible employees could receive up to 55% of earnings to a maximum of \$595 per week through the Employment Insurance programme. EI benefit amounts are determined by Service Canada and may change from time to time.

More information about this type of leave (e.g., payment of benefits during pregnancy / parental leave) can be found at the link above.

9. BEREAVEMENT LEAVE

U2 Fasteners will grant **2 days of paid bereavement leave when someone in their immediate family passes**. Immediate family includes: parents, grand parents, siblings, spouse, children and grand children. This paid bereavement leave exceeds ESA minimum requirements. Unpaid leave will apply for all other types of bereavement leave.

10. LEAVE OF ABSENCE (ALL TYPES, INCLUDING APPOINTMENTS):

If an employee is not able to work or is ill, she/he is required to report their absence to management **immediately**. If an employee needs to leave the workplace (U2 fasteners) for any reason, the employee must always let their supervisor know the reason for the leave and the expected date and time of return to work.

Prior notice is required for non-emergency appointments.

A medical note may be requested for any absence of over 2 days – provided health care professionals are offering this service. It is noted that the employer can only ask: the (expected) duration of the absence, the date the employee was seen by a health care professional, and whether the patient was examined in person by the health care professional issuing the note. U2 does not pay for the hours of absence when an employee is attending appointments during a normal work day.

If an employee says they are sick, and are seen in public (exclusive of visits to hospital, doctor, pharmacy, and clinics), the employee will be given an opportunity to explain why they are not at home, but disciplinary action, up to and including termination, may result when the employee did not qualify for a sick leave day.

U2 fasteners will try to keep a person's position for them in case of a lengthy illness.

11. VACATION:

Vacation pay (4% for the first 5 years of employment, 6% in year 6, etc. as legislated) will be paid for select hourly part time or full time employees. Vacation pay is also used for all hourly employees until they have passed probation.



For those who do not receive vacation pay, paid Vacation Days are calculated as a regular working day of 8 hours.

Full time employees:

After Hire (first year of employment), vacation days are pro-rated based on days worked (up to 6 days). *Note: Employees hired before Jan 1, 2021 are grandfathered under the former holiday provisions. (0, 10, 11, 12, 13, 15, ...)*

After passing probation	up to 6 paid vacation days (pro-rated from date probation ends)
After 1 Year	10 paid vacation days
After 2 Years	10 paid vacation days
After 3 Years	10 paid vacation days
After 4 Years	10 paid vacation days
After 5 Years.....	15 paid vacation days (3 weeks)
After 6 Years	16 paid vacation days
After 7 Years	17 paid vacation days
After 8 Years	18 paid vacation days
After 9 Years	19 paid vacation days
After 10 Years	20 paid vacation days (4 weeks)
After 11 Years	21 paid vacation days
After 12 Years	22 paid vacation days
After 13 Years	23 paid vacation days
After 14 Years	24 paid vacation days
After 15 Years+	25 paid vacation days (5 weeks)

(review this in 2030)

Annual vacation days: Holiday requests will normally be processed on a first-come, first-serve basis. Therefore, best practice is to submit requests as soon as possible.

Vacation requests for warehouse staff must be approved by the warehouse manager or designate. Vacation requests for office staff must be approved by the Office manager or designate. All parties must ensure that all departments are staffed during normal working hours (physically or virtually) each working day.

With regards to holidays, the following applies to all staff:



- * staff must be available for **inventory days** in November
- * staff should **save up to 3 days vacation for the closure between Christmas and New Years** or risk having no pay for these days
- * holidays must be **pre-approved** so that management can ensure all areas are staffed to carry out business
- * vacation days can **only be carried over into the new year by special permission** from payroll management.
- * Unused vacation time may be forfeited unless approved for carryover; however, accrued vacation pay will be paid in accordance with the Employment Standards Act.

With the exception of emergencies, no more than two short notice vacation days will be permitted. This must also be approved by management.

We encourage all staff NOT to schedule their appointments on Friday afternoons or on Monday mornings in an attempt to create additional long weekends.

12. PAYROLL:

Employees at U2 fasteners receive their payroll payments **semi-monthly with direct deposit**. Please provide your bank information (voided cheque) to arrange for direct deposit payments. Payroll will be direct deposited into your bank account no later than 3 working days after payroll has been processed. Please always ensure that your time cards and times are entered correctly. If there are any questions or problems, please contact payroll management (defined above).

Bonuses are paid at the discretion of management. Discretionary bonuses are not included in vacation pay calculations unless otherwise required by law. Bonuses received by cheque will be taxed on next payroll payment.

Every year in early December, employee performance will be evaluated.

Please note that U2 does NOT make payroll advances, nor loans to employees.

All payroll information shall be kept confidential.

13. CRIMINAL RECORD CHECK

Due to security, customer, and certification requirements (including C-TPAT), U2 Fasteners requires each new employee to provide a current police record check by the date of hire. On your anniversary month (that would be your month of hire) of **every 10 years** you are required

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to bring in an updated Criminal Record Check. You will be reimbursed for the fee charged by the Police Department. If an employee does not continue to have a clean and current criminal record check (due to the need for U2 to be certified under PIP and C/TPAT), this shall be grounds for termination.

14. SAFETY EQUIPMENT / PPE

All safety equipment and personal protective equipment (PPE) is purchased by U2 fasteners.

15. SAFETY SHOES / BOOTS

Warehouse staff will receive reimbursement for boots / safety shoes by presenting the receipt for purchase of a maximum of CDN \$200.00 every 2nd year. These reimbursed safety boots are to be worn at all times during working hours in the warehouse of U2 fasteners.

16. SMOKING / DRINKING/ DRUGS

Smoking in the building and during working hours is prohibited.

Smoking is allowed **only OUTSIDE** in a designated area (**near the gate house**) on coffee breaks or lunch breaks.

Consumption of any alcohol beverages on U2 fasteners' property is strictly prohibited at all times.

Employees shall read, sign, and abide by the **U2 Drugs Policy**, which includes recreational cannabis.

17. BENEFITS

After successful completion of the (approx.) 90 days probation performance review, select, full-time U2 employees will be entitled to participate in the Benefits Plan administered by ManuLife.

If you are eligible, your Offer of Employment letter will have information about what benefits are available to you, and what this will cost you. While the employer pays the majority of the costs for these benefits, your pay will have a benefits deduction based on which benefits are provided.

**18. EMPLOYEE ACKNOWLEDGMENT AND RECEIPT**

I acknowledge that I have received, read, and understand the U2 Fasteners Employment Policy (Version 1.1, January 5, 2026). I understand that this document outlines U2 Fasteners' policies, expectations, and standards of conduct, and that it is my responsibility to comply with these policies as a condition of my employment.

I understand that this policy is not a contract of employment, and that nothing in this document alters the terms of my employment or limits U2 Fasteners' rights to manage, discipline, or terminate employment in accordance with applicable law.

I further understand that U2 Fasteners reserves the right to amend, revise, or replace this policy at any time, with or without notice, subject to applicable legislation.

Where any provision of this policy conflicts with the Employment Standards Act (Ontario) or other applicable legislation, the legislation shall prevail.

I also read and understand the following U2 policies:

Health and Safety Policy *Initials* _____

Drug and Alcohol Policy *Initials* _____

Workplace Harassment *Initials* _____

Workplace Violence *Initials* _____

Video Surveillance Policy *Initials* _____

FIRE DRILL AND EVACUATION POLICY *Initials* _____

Unauthorized Person Policy *Initials* _____

Failure to comply with the rules in this document and rules in related policy documents may result in disciplinary action, up to and including termination of employment.

By signing below, I confirm my understanding and acknowledgment of the above.

Employee Name (Print): Employee Signature: Date: _____	For U2 Fasteners: Name / Title: Signature: Date: _____
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HEALTH AND SAFETY POLICY

POLICY STATEMENT

U2 Fasteners is committed to providing a safe and healthy workplace for all employees. Protecting the health and safety of workers is a core business objective and an integral part of all workplace activities.

U2 Fasteners will take every reasonable precaution to protect workers from injury and occupational illness, in accordance with the Ontario Occupational Health and Safety Act (OHSA) and applicable regulations.

EMPLOYER RESPONSIBILITIES

U2 Fasteners, as the employer, is ultimately responsible for workplace health and safety. The company will:

- Comply with the Occupational Health and Safety Act and all applicable regulations;
- Provide and maintain safe equipment, materials, and protective devices;
- Ensure workers receive appropriate information, instruction, training, and supervision;
- Identify hazards and take reasonable steps to eliminate or control risks;
- Support and maintain required health and safety programs and policies.

SUPERVISOR RESPONSIBILITIES

Supervisors are responsible for protecting the health and safety of workers under their supervision and will:

- Ensure work is performed in compliance with OHSA and company policies;
- Ensure equipment and protective devices are used and maintained properly;
- Address hazards and unsafe conditions promptly;
- Ensure workers are adequately trained to perform their duties safely.

WORKER RESPONSIBILITIES

All workers are responsible for protecting their own health and safety and that of others. Workers must:

- Work in compliance with OHSA and company policies;
- Use or wear required personal protective equipment;



- Report hazards, unsafe conditions, or incidents to their supervisor;
- Refrain from unsafe acts or behaviour that may endanger themselves or others.

RIGHTS OF WORKERS

Workers have the right to:

- Know about workplace hazards;
- Participate in workplace health and safety initiatives;
- Refuse unsafe work, in accordance with the Occupational Health and Safety Act.

PROGRAMS AND SUPPORTING POLICIES

This policy is supported by workplace programs and procedures, including:

- Workplace Violence Policy
- Workplace Harassment Policy
- Drug and Alcohol Policy
- Emergency Procedures
- WHMIS Training and Hazard Communication
- Personal Protective Equipment Requirements

ENFORCEMENT

Failure to comply with this policy or related procedures may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

REVIEW

This policy will be reviewed at least annually and updated as required to ensure ongoing compliance.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026



WORKPLACE VIOLENCE POLICY

POLICY STATEMENT

U2 Fasteners is committed to the prevention of workplace violence and to promoting a safe and healthy work environment. U2 Fasteners will take all reasonable steps to protect workers from workplace violence from any source.

DEFINITION OF WORKPLACE VIOLENCE

Workplace violence means:

- The exercise of physical force by a person against a worker in a workplace that causes or could cause physical injury;
- An attempt to exercise physical force against a worker in a workplace that could cause physical injury; or
- A statement or behaviour that a worker could reasonably interpret as a threat to exercise physical force against the worker in a workplace that could cause physical injury.

APPLICATION

Violent behaviour in the workplace is unacceptable. This policy applies to all employees and to all persons on company property, including family members, visitors, customers, contractors, delivery personnel, and volunteers.

WORKPLACE VIOLENCE PROGRAM

U2 Fasteners maintains a Workplace Violence Prevention Program that supports this policy. The program includes:

- Procedures to identify and assess risks of workplace violence;
- Procedures for employees to report incidents or concerns;
- Measures to summon immediate assistance when required;
- Investigation and response processes for incidents and complaints.

INFORMATION AND TRAINING

U2 Fasteners will provide employees and supervisors with information and instruction on the contents of this policy and the Workplace Violence Prevention Program.

SUPERVISOR RESPONSIBILITIES



Supervisors are responsible for ensuring that this policy and related procedures are followed and that employees are informed of workplace violence risks.

EMPLOYEE RESPONSIBILITIES

All employees must comply with this policy and are encouraged to report any incidents or concerns regarding workplace violence. Reports made in good faith will not result in retaliation.

ENFORCEMENT

Violations of this policy may result in disciplinary action, up to and including termination of employment.

INVESTIGATION

All incidents and complaints of workplace violence will be investigated promptly, fairly, and confidentially, to the extent possible.

COMMITMENT

U2 Fasteners is committed to maintaining this policy and its supporting program to protect employees from workplace violence.

Approved by:

Swen Ruhmann, CEO

Date: January 14, 2026

Last Reviewed / Revised: January 2026



WORKPLACE HARASSMENT POLICY

POLICY STATEMENT

U2 Fasteners is committed to providing a work environment in which all employees are treated with dignity and respect. Workplace harassment will not be tolerated, and all employees have the right to work free from harassment, intimidation, or offensive conduct.

This policy is an addendum to the U2 Fasteners Health and Safety Policy and Employment Policy and is intended to meet the requirements of the Ontario Occupational Health and Safety Act.

DEFINITION OF WORKPLACE HARASSMENT

Workplace harassment means 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 includes workplace sexual harassment.

Workplace sexual harassment includes:

- Engaging in a course of vexatious comment or conduct against a worker because of sex, sexual orientation, gender identity or gender expression, that is known or ought reasonably to be known to be unwelcome; or
- Making a sexual solicitation or advance where the person making the solicitation is in a position to confer, grant, or deny a benefit or advancement and knows or ought reasonably to know the solicitation is unwelcome.

REASONABLE ACTIONS

Reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace, including performance management, discipline, or work assignments, does not constitute workplace harassment.

APPLICATION

This policy applies to all employees and to all persons on company premises or conducting business on behalf of U2 Fasteners, including visitors, customers, contractors, subcontractors, and suppliers.

ROLES AND RESPONSIBILITIES



Supervisors and managers are responsible for:

- Upholding and enforcing this policy;
- Responding promptly to incidents or complaints;
- Ensuring employees are aware of this policy.

Employees are responsible for:

- Conducting themselves in a respectful manner;
- Reporting incidents of harassment they experience or witness.

REPORTING HARASSMENT

Employees who believe they have been subjected to workplace harassment are encouraged to report the incident as soon as possible to:

- Their supervisor or manager;
- A member of senior management.

Reports may be made verbally or in writing. There will be no retaliation against any employee who reports harassment or participates in an investigation in good faith.

INVESTIGATION

All incidents and complaints of workplace harassment will be investigated in a timely, fair, and confidential manner, to the extent possible. Appropriate corrective action will be taken where harassment is substantiated.

CONFIDENTIALITY

Information obtained during an investigation will be shared only as necessary to investigate the complaint or take corrective action, or as required by law.

ENFORCEMENT

Violations of this policy may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

REVIEW

This policy will be reviewed periodically and updated as required.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026



DRUG AND ALCOHOL POLICY

POLICY STATEMENT

U2 Fasteners is committed to maintaining a safe, healthy, and productive workplace. The use, possession, distribution, or impairment from drugs or alcohol that could affect safety, performance, or judgment is prohibited.

This policy forms part of the U2 Fasteners Health and Safety Policy and Employment Policy and is a condition of employment.

SCOPE

This policy applies to all employees, contractors, visitors, and any individual performing work on behalf of U2 Fasteners, including while operating equipment or driving on company business.

DEFINITIONS

Impairment means reduced physical or mental ability affecting alertness, coordination, reaction time, or judgment.

Drugs include illegal drugs, cannabis, controlled substances, and prescription or over-the-counter medications that may cause impairment.

Alcohol includes beer, wine, spirits, and any substance containing ethyl alcohol.

PROHIBITED CONDUCT

Employees must not:

- Attend work or remain at work while impaired
- Use, possess, distribute, sell, or offer drugs or alcohol on company premises
- Operate vehicles, machinery, or equipment while impaired
- Drive on company business while impaired

CANNABIS AND MEDICATIONS

Legal cannabis and prescribed medications do not change workplace safety expectations. Employees must not perform work while impaired.

Accommodation related to prescribed medication or dependency will be considered in accordance with human rights legislation.

REPORTING AND SUPPORT

Employees are encouraged to seek assistance before safety or performance is affected. Concerns related to impairment must be reported immediately.

**ENFORCEMENT**

Violations may result in disciplinary action, up to and including termination, in accordance with applicable law.

NO REPRISALS

There will be no retaliation for reports or requests for assistance made in good faith.

REVIEW

This policy will be reviewed periodically.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 2026



VIDEO SURVEILLANCE (CAMERAS) POLICY

POLICY STATEMENT

U2 Fasteners uses video surveillance systems on company property to promote safety, protect company assets, and deter theft, vandalism, and unauthorized activity.

Video surveillance is used in accordance with applicable privacy legislation.

SCOPE

This policy applies to all employees, contractors, visitors, and any individual present on U2 Fasteners property.

PURPOSE OF SURVEILLANCE

Cameras may be used to:

- Enhance workplace safety;
- Protect company property and assets;
- Investigate incidents or policy violations;
- Support loss prevention and security.

USE AND LIMITATIONS

- Cameras are installed only in common areas, building exteriors, and operational areas.
- Cameras will not be installed in areas where individuals have a reasonable expectation of privacy (e.g., washrooms, change rooms).
- Surveillance is not used for continuous performance monitoring.

ACCESS TO RECORDINGS

- Access to video recordings is restricted to authorized management.
- Recordings will be used only for legitimate business or legal purposes.
- Video data will be retained only as long as necessary.

EMPLOYEE NOTICE

Appropriate signage will be posted to notify individuals that video surveillance is in use.



ENFORCEMENT

Misuse of surveillance equipment or recordings may result in disciplinary action.

REVIEW

This policy will be reviewed periodically and updated as required.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026



UNAUTHORIZED PERSONS POLICY

POLICY STATEMENT

U2 Fasteners is committed to maintaining a safe, secure, and controlled workplace. To protect employees, visitors, company property, and confidential information, access to U2 Fasteners premises is restricted to authorized individuals only.

This policy supports the U2 Fasteners Health and Safety Policy, Workplace Violence Policy, and Employment Policy.

DEFINITION OF UNAUTHORIZED PERSON

An unauthorized person is any individual who is not:

- An employee of U2 Fasteners;
- A contractor, supplier, or service provider authorized to be on-site;
- A visitor who has received permission and is being supervised by an authorized employee.

This includes former employees, family members, friends, customers, delivery personnel outside permitted areas, or any individual refusing to comply with site access requirements.

ACCESS CONTROL

- All visitors must report to the designated entry point and receive authorization before entering the premises.
- Visitors must remain in authorized areas and be accompanied by a U2 Fasteners employee at all times, unless otherwise approved.
- Employees are responsible for the conduct and supervision of visitors they host.

PROHIBITED CONDUCT

Unauthorized persons must not:

- Enter or remain on U2 Fasteners property without permission;
- Access restricted or operational areas;
- Interfere with employees, operations, or equipment;
- Refuse to leave when instructed to do so by management or security.

EMPLOYEE RESPONSIBILITIES

U2FASTENERS™ – #500, 100 Main St. Thunder Bay, Ontario, CANADA P7B 6R9
t: 807-345-3119 f: 807-623-6224 info@u2fasteners.com www.u2fasteners.com



Employees must:

- Challenge unknown or unauthorized individuals in a safe and respectful manner, where appropriate;
- Report unauthorized persons immediately to a supervisor or manager;
- Not allow tailgating or unauthorized access to secure areas;
- Follow all site access and security procedures.

RESPONSE AND ENFORCEMENT

Management may require any unauthorized person to leave the premises immediately. Where necessary, law enforcement or emergency services may be contacted.

Employees who knowingly allow unauthorized access or fail to follow this policy may be subject to disciplinary action, up to and including termination of employment, in accordance with applicable law.

REVIEW

This policy will be reviewed periodically and updated as required.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026



FIRE DRILL AND EMERGENCY EVACUATION POLICY

POLICY STATEMENT

U2 Fasteners is committed to protecting the health and safety of employees, visitors, and contractors by ensuring effective response procedures in the event of a fire or other emergency requiring evacuation.

This policy supports the U2 Fasteners Health and Safety Policy and complies with applicable fire and safety legislation.

SCOPE

This policy applies to all employees, contractors, and visitors at all U2 Fasteners premises.

RESPONSIBILITIES

Employer:

- Establish and maintain emergency evacuation procedures;
- Ensure fire safety equipment is maintained;
- Conduct fire drills as required or deemed appropriate.

Supervisors:

- Ensure employees are familiar with evacuation routes and assembly points;
- Assist with orderly evacuation during emergencies.

Employees:

- Familiarize themselves with evacuation routes and alarm signals;
- Participate in fire drills;
- Immediately evacuate when an alarm sounds, unless directed otherwise by emergency personnel.

EVACUATION PROCEDURES

- Upon activation of the fire alarm, all persons must immediately stop work and evacuate the building using the nearest safe exit.
- Employees must proceed to the designated assembly point and remain there until cleared to return.
- Supervisors will account for employees where practicable.



FIRE DRILLS

Fire drills may be conducted periodically to ensure preparedness. Employees are required to participate fully in all drills.

ENFORCEMENT

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

REVIEW

This policy will be reviewed periodically and updated as required.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026