

**TITAN HOSPITALITY LTD.**

**EMPLOYEE HANDBOOK**

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## Acknowledgement and Disclaimer for Employee Handbook

This is to acknowledge that I have read the Employee Handbook (the "Handbook") of Titan Hospitality Ltd. (the "Company").

I acknowledge that a copy of the Handbook can be accessed online through the Company's web page and that I may request a hard copy of the Handbook from the Human Resources Department. The Handbook published online is the most current version and supersedes any other Handbook or policies. I understand that the Handbook is intended to serve as a guide to the Company's policies, procedures and benefits, and that all policies, procedures and benefits described in the Handbook are at all times subject to modification by the Company. I understand that, should I have any questions, I may contact the management team or the Human Resources Department. Included in the Handbook are the following:

- The Company's Philosophy;
- Working Guidelines;
- Benefits;
- Security Policy;
- Health & Hygiene Policy;
- Safety Policy;
- Workplace Violence Policy
- Harassment Policy;
- Ethics & Integrity Policy;
- Electronics Policy; and
- Drug and Alcohol Testing Policy.

I acknowledge that nothing contained in the Handbook creates a binding contract and that, until I have completed six months of continuous employment with the Company, my employment is at-will, which means that it is for no set period of time and may be terminated by me or the Company at any time with or without cause. Nothing shall have the effect of changing the at-will status of my employment during that time other than a written agreement signed by me and an authorized representative of the Company specifically changing that status. The Company hereby acknowledges that if it terminates my employment for reasons other than summary dismissal, as defined in the Employment Act 2001 as amended (the "Act"), the Company is required to give me a minimum period of notice *provided that* I have been continuously employed by the Company for six months or more.

By signing below, I hereby agree to the terms and conditions outlined in the Handbook.

Employee Name \_\_\_\_\_

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Witness Name \_\_\_\_\_

Witness Signature \_\_\_\_\_ Date \_\_\_\_\_

## **EMPLOYEE HANDBOOK WORKING GUIDELINES**

### **Purpose**

This Handbook is designed to acquaint you with the Company and to provide employees with information about working conditions, employee benefits, and company policies affecting your employment. It describes many of your responsibilities as an employee and outlines the programs developed by the Company to benefit you. You should read the Handbook's provisions carefully and direct any questions you have about the Company's policies to the Human Resources Department.

The Company's primary purpose is to operate restaurants and other types of hospitality businesses within the Commonwealth of the Bahamas. At any time and without prior consultation, the Company reserves the right to transfer employees between different business locations which the Company operates. The employee may be required to transfer his/her place of work and perform different duties or types of work within the employee's general grade as required by the Company.

It is important to realize that no policy manual can anticipate every circumstance that will occur or every situation that will develop. As the Company faces new and different situations, the need will arise from time to time to change the policies described in this Handbook, or to modify the way the policies are applied. Some of the Company's policies are affected by law, which is also subject to change. For these reasons, the Company reserves the right to revise, supplement, or rescind any portion of this Handbook as management deems appropriate, using its sole and absolute discretion. The Company will attempt to provide advance notice of any such changes although, in certain circumstances, this will not always be feasible. Therefore, the Company retains the right to make changes to this Handbook without prior notice to employees.

### **Contact Details of Human Resources Department**

Head Office: House of Mosko  
P.O. Box 4804  
Nassau, the Bahamas

Human Resources Department: T: +1 242 322 4871  
E: info@titan.bs

Website:

### **The Company's Philosophy**

The Company's mission is to create a great experience for both guests and employees. Key to meeting this objective is the Company's employees who can help by:

- Remembering that first impressions are lasting impressions.
- Striving for excellence and delivering their best.

- Putting customers first and understanding their needs and surpassing their expectations.
- Being passionate and enthusiastic about what they do.
- Supporting their colleagues and being a team player at all times.
- Using their initiative and being prepared to be flexible.
- Giving that extra 10% and paying attention to detail.
- Working hard and enjoying the experience.

If you enjoy your work, your customers will enjoy the service you give them so smile and have fun!

### **Nature of Employment**

Whilst we hope that our relationship with our employees will be mutually satisfying and beneficial, we recognize that an employee may resign his/her employment at any time and for any reason. You, as an employee, should also understand that the Company has a corresponding right to terminate your employment at any time, with or without cause, provided that a minimum period of notice is provided to those continuously employed by the Company for six months or longer.

Whilst it is certainly not our intent or our practice to terminate employees arbitrarily, it is important that employees understand that they have no guarantee regarding the duration of their employment. Likewise, there is no limitation on the grounds for which employees can be terminated, except as prohibited by law.

### **Equal Employment Opportunity**

The Company supports and is committed to equal employment opportunity for all people. The Company does not discriminate against applicants or employees on the basis of race, ethnic, national origin, marital status, colour, age, religion, political opinion, sex, or disability. By adoption of this policy, the Company assures compliance with all laws, and reaffirms its continued commitment to offering Equal Employment Opportunities *provided, however*, that this section shall not affect any other law or contract term which stipulates a retirement age.

## **WORKING GUIDELINES**

### **Employee Training**

All applicants will be required to take and complete all training courses required by the Company. Training may include, but is not limited to, food handling and health department training and testing.

### **180-Day Trial Period**

1. A new employee must read and sign all appropriate documents relevant to the position prior to being employed by the Company.

2. New employees will serve a 180-day trial period commencing on the first day of work.
3. New employees will be evaluated at least once within the 180-day trial period.
4. A new employee can be dismissed during their trial period or any time thereafter if judged to be incapable of meeting the Company's standards.
5. All employees will be required to provide a police certificate and have a blood test done prior to starting work. The blood test shall not include pre-screening for HIV status.
6. Employees that are promoted must complete a secondary 180-day "introductory period" commencing on the first day of their new position. For the avoidance of doubt, employees who have already completed the initial 180-day trial period would be entitled to the minimum period of notice required under the Act and this provision merely entitles the Company to reassign employees to the same position and pay before the promotion.

### **Change of Personal Information**

Employees will not get paid until they have provided the Company with personal details including bank details, National Insurance details, appropriate Right to Work documentation and their email address. In order for employee records to be kept up-to-date, employees must notify a member of the Human Resources Department if there is a change in their name, personal circumstances, home address, bank details, email address or telephone number as soon as possible. Employees can do this by sending an email to the Human Resources Department.

### **Definition of Status**

All employees of the Company are contract food service employees and may be required to work a variety of duties and at different locations based on business needs.

Full-Time Employees: The Company shall designate full-time employees. Designation is based on factors including performance, availability, and business necessity. Designated full-time employees will work an average of 40 hours or more per week in any twelve month period.

Part-Time Employees: Employees who work an average of less than 40 hours per week are part-time employees.

### **Scheduling**

1. Employees may be required to work a variety of days and hours that can vary from week to week. The majority of employees will have to work during the weekend when business is at its peak. All employees may be required to work on certain special days such as public holidays.

2. Weekly work schedules will be prepared by management. Management reserves the right to schedule employees based on business needs.
3. Requests for specific days off that vary from an employee's normal availability must be submitted in writing at least two weeks in advance. All schedule requests are subject to management approval.
4. If an employee needs a day off after the schedule has been written, the employee will be required to find their own replacement whose skills are comparable to their own. These schedule changes must be reported to and pre-approved by management.

### **Reporting to Work**

Whilst at work, an employee's first responsibility is to the Company and, during work hours, employees must not engage in any private business activity whether or not this is for financial gain.

Good time keeping and attendance are crucial to the standard of service that the Company aims to provide to its guests and employees are responsible for ensuring that they arrive a minimum of fifteen minutes prior to the start of their shift and are ready to start on time.

At each location of the Company, employees will be required to register their fingerprint on the biometric time clock provided.

1. Employees must enter the place of business via the designated staff entrance and clock-in by scanning their fingerprint on the biometric time clock provided.
2. Employees must be at their work area and ready to work at the scheduled start time of their shift. To facilitate this, employees will be required to clock-in at least fifteen minutes before the assigned starting time of their shift.
3. Employees will be considered tardy for work if they fail to clock-in at least fifteen minutes before their scheduled start time. If an employee determines that he/she will be late, the employee must call the manager on duty to report such delay.
4. All employees must clock-in and out on the biometric time clock. No employee is permitted to work if he/she has not clocked-in on the biometric time clock. It is the employee's responsibility to clock-in and out in order to maintain accurate records.

### **Transportation & Parking**

1. All employees are expected to provide their own means of transportation to and from the place of work.
2. Unless otherwise advised, no specific area within any designated parking areas is provided for your vehicle.
3. Employees are not permitted to park in spaces that are reserved.

4. The Company assumes no responsibility for any vehicle or its contents parked in any parking area whether designated or not.

### **Emergency Situations**

In the event of evacuation, a nominated fire warden shall be responsible for clearing all areas and taking a roll call of staff.

Should there be a need to evacuate, employees will be advised by their manager. Employees should make their way calmly, quietly and without running via the nearest fire exit to the appropriate evacuation point.

Employees must not re-enter their areas until authorisation is given by the manager on duty.

### **Suspicious Objects**

If an employee discovers a suspicious package or it is reported to an employee:

- Do NOT touch it.
- Ensure the package does not belong to anyone in the vicinity.
- If it is not claimed, report it immediately to the on-duty manager who will contact the appropriate security personnel.

### **Personal Belongings**

The Company strongly recommends that items of value and large sums of money are not brought to work as the Company cannot take any responsibility for any loss or damage to the same. The Company does not insure employee's property and accepts no liability for loss or damage. Employees are responsible for insuring their own belongings; therefore the Company asks employees to only bring the minimal amount with them to work. The Company may provide a storage area for personal belongings but any items are stored at the owner's risk.

Whilst at work, employees may be asked to seal their wallet/ purse and mobile phone in a clear bag for the duration of their shift. This is to ensure the safety and security of employee's belongings.

### **Dress and Professional Appearance**

In order to keep the food preparation environment as clean and as hygienic as possible, it is imperative that the uniform that employees wear is kept clean and free from debris, odours and stains that could otherwise jeopardise their sanitary work environment.

[The Company will provide employees with the following at cost:

- 4 x Polo Shirts / T-Shirts (depending on role and location);
- 2 x Blue/Black Trousers (depending on location);
- 2 x Waistcoats (depending on role and location);

- A Tie (where applicable);
- 2 x aprons (where applicable);
- A Cap (where applicable);
- 1 x pair of suspenders (where applicable); and
- Any Personal Protective Equipment employees may require.

The cost of the above will be deducted from each employee's weekly pay check over a twelve month period. For the avoidance of doubt, only standard sizes will be provided and the cost of any alterations or repairs will be at the employee's cost. Should an employee lose or require additional uniform then the cost of such shall immediately be deducted from that employee's paycheck.

**The uniform that the Company requests employees to provide is as follows:**

- **Plain black, fully enclosed, polished shoes (no sandals, high heels or ballet pumps); and**
- **Plain black socks for trousers or flesh tone tights for skirts.**

**N.B. Team Support and Kitchen Support positions may wear trainers - these however must be black, sturdy, in good repair and look smart.**

### **Uniform Standard**

Employees must follow these simple uniform standards whenever they are in Company uniform:

1. Employees must wear the attire as defined by the place of business.
2. All employees must be in appropriate dress at the time they clock-in and at all times whilst on duty. Employees must report to and from work in full work attire.
3. Work attire must be laundered and presentable.
4. Any name tags must be worn at all times when in uniform. The nametag should be displayed on the left-hand side of the shirt.
5. The Company strives to maintain a good image. All employees, managers and corporate personnel (when they are in their place of employment) must follow the guidelines below:

#### Footwear:

- a) Employees must wear approved safety shoes at all times while on duty. Shoes should follow the style guidelines for the work area.
- b) Employees must wear sturdy shoes that offer some protection to their feet.
- c) Shoes should be plain black, fully enclosed, and polished. Stewards may wear trainers - these however must be black, sturdy, in good repair and look smart.

### Jewellery:

- a) Male employees are permitted to wear one stud earring per ear. No hoops are permitted.
- b) Females are permitted to wear two stud earrings per ear. No hoops are permitted.
- c) The Company reserves the right to maintain a good image and reserves the right to require an employee to remove any visible piercing while working.
- d) Male and female employees are permitted to wear one ring on each hand. No large or offensive jewellery is permitted.

### Tattoos – Front of House Employees:

- a) Small tattoos on arms, wrists or necks that cannot be covered with a shirt are acceptable as long as they are not offensive.
- b) Band-Aids should not be used to cover tattoos.
- c) The Company reserves the right to require the covering of any visible tattoos while working.
- d) Any visible tattoos that cannot be covered and that do not maintain the Company's good image are not acceptable.

### Nail Polish:

- a) Nail Polish is acceptable only in non-food production areas (servers & greeting centre only). The polish needs to be in good taste and maintain the Company's good image.
- b) Nail polish and artificial fingernails are not allowed in food production areas.
- c) Nail polish is not permitted for males.

### Hair:

- a) Hair must be restrained in food production areas and the dish room. Ponytails should be restrained twice, if necessary. All hair must be pulled away from face if it is below the earlobe. Hair must be restrained even if wearing a hat. Front of House male crew members must have their hair cut to a length above the shirt collar. Ponytails are not acceptable. Front of House female crew members must have their hair pulled away from face if it is below the earlobe. Ponytails should be restrained twice, if necessary.
- b) The colouring of hair is acceptable as long as it is not extreme.
- c) The Company reserves the right to limit an individual to working because of an extreme hair colour that does not maintain the Company's good image.

### Facial Hair:

- a) Employees must maintain a high standard of personal hygiene and grooming when reporting to work.
- b) Employees should be clean shaven or any facial hair should be kept neatly trimmed and well-maintained.

Employees must ensure that they are correctly dressed at all times:

- Shirts should always be tucked in.
- Hats should always be worn if provided.
- Aprons should be kept clean and changed if they become dirty throughout the day.
- Any ties and accreditation passes should be worn inside the apron.
- The neck strap of the apron should be worn underneath the collar.

If employees do not comply with these uniform standards, employees may not be allowed to start work or their shift may be terminated and the remainder of the shift will be forfeited.

### **Company Vehicles**

Some employees will be required to use Company vehicles to carry out their duties. If an employee is required to drive as part of their employment then an employee should only use a Company vehicle after completion of an authority to drive form. The employee must be aged 21 or over and hold a full Bahamian Driving Licence to drive a vehicle for work.

### **Injury or Accident While Working**

It is the employee's responsibility to report any accident, injury, incident or near miss to the manager on duty by the end of their shift. The Company has a duty to investigate any accident or dangerous occurrence; therefore, employees must notify their manager immediately should an accident occur and the incident should be recorded in an Employee Accident Report.

### **Break Periods**

Unpaid break periods shall be for a minimum of 30 minutes and generally a maximum of one hour in length unless otherwise approved by the manager. Managers are responsible for approving and assigning all break periods and breaks are to be taken in a pre-assigned areas away from guests. Employees are responsible for keeping the break area clean.

Employees are only permitted to leave the premises during their break if they are off the clock and must inform the shift manager when they are leaving and when they will return.

### **Tobacco Use**

Employees are only permitted to smoke tobacco in designated areas (if any) outside their place of work. This rule also applies to the use of any form of smokeless tobacco.

### **Telephone Use**

1. The use of the Company telephone for personal calls without the on-duty manager's approval is not permitted. However, employees may use the Company telephone in the case of an emergency.
2. Use of personal mobile phones is not permitted while employees are on-duty. If you are on a break, mobile phone use is permitted to the extent that such use does not negatively

impact business operations or the performance of other employees. In the event of exceptional circumstances or an emergency situation, employees are requested to discuss this with the manager on-duty prior to the start of their shift where possible. Violation of this policy will result in disciplinary action up to and including possible dismissal.

3. Management is responsible for setting a positive example to employees with respect to mobile phone use. Management should refrain from using mobile phones when on duty and in view of guests or employees unless there are exceptional circumstances or in an emergency situation.

### **Leaving Work**

1. Employees must exit the place of business via the designated staff exit during business hours.
2. At the end of their shift, employees must clock-out by scanning their fingerprint on the biometric time clock provided.
3. After the close of business, employees must follow the security procedures that are established at each location.

### **Reporting Off Work**

The staffing of each of the Company's locations is critical and time consuming. Each person who is placed on the schedule is needed in order to make the shift for that day run smoothly. When a scheduled member of staff is absent, it causes disruption to the workday for the manager and other employees. If an employee is unable to report for a scheduled shift, the on-duty manager must be notified. Failing to report as outlined may result in disciplinary action. The following applies to all employees:

1. Reporting off work must only be done for necessary and legitimate reasons.
2. If an employee is going to report off work, the employee must speak to the manager on-duty. An employee is not authorized to accept call-offs.
3. If possible, an employee must report their expected absence from work at least four hours before the scheduled start time of their shift or, for opening shifts, the night before.
4. Management may request a doctor's excuse letter on emergency medical call offs. The doctor's excuse letter must include dates of appointment and duration that the employee is unable to work or is restricted from work.
5. Excessive absenteeism or failure to report to work may result in disciplinary action up to and including dismissal.

6. The Company will consider an employee to have voluntarily abandoned their job if they do not report to work and fail to contact their manager for three consecutive days.

### **Service Charge Reporting**

Guidelines and procedures will be published separately.

### **Service Charge**

Service charges or automatic gratuities included on a guest check shall be pooled amongst all employees in a manner that is at management's sole discretion. Such service charges or automatic gratuities shall be subject to statutory National Insurance Board ("NIB") deductions and the like.

All employees have the right to retain any additional gratuities that they personally receive and which are not included on a guest check, subject to a valid gratuity pooling arrangement limited to employees who customarily and regularly receive gratuities. The employee shall solely be responsible for reporting such additional gratuities to the NIB and for settling any contributions due thereon.

### **Daily and Weekly Rest Period**

In every seven-day period, the Company shall allow each employee at least forty-eight hours of rest with not less than twenty-four of such hours being consecutive.

### **Minor Employees**

Certain requirements and restrictions apply to the employment of Young Persons (ages 14 - 17), including the types of duties and the number of hours that they can work. In accordance with the provisions of the Act, anyone under the age of 14 will not be hired.

Young Persons are not permitted to perform "hazardous occupations". Below is a list of the types of work prohibited:

Individuals under the age of 18 are not permitted to:

1. Go on the roof or do any roofing work.
2. Operate any power or electrical equipment; for example, garbage disposal, yogurt machine, mixer, etc.
3. Drive a motor vehicle on behalf of the Company.
4. Prepare, sell or serve alcohol.

In addition, individuals under 16 are not permitted to:

1. Do any work requiring the use of a ladder.
2. Do any cooking or baking.
3. Do any maintenance or repair of machines or equipment.
4. Work in freezers, meat coolers, or work in the preparation of meat for sale.

5. Load or unload goods to or from trucks.
6. Work in warehouses (except in the office and/or completing clerical work).

#### Hours of employment for Young Persons:

Young Persons shall not be employed in any work to be performed during any hours in which any school at which such person is a pupil is ordinarily in session or during such other periods as may prejudice his/her attendance at such school or render him/her unfit to obtain the full benefit of the education provided for him/her.

A Young Person may work outside school hours under the following conditions:

1. on a school day, for not more than three hours;
2. on a school week, for not more than twenty-four hours;
3. on a non-school day, for not more than eight hours; or
4. on a non-school week, for not more than forty hours.

#### **Pay Periods**

1. Payroll follows a one week cycle commencing at 12:01 am on a Monday morning and ending the following Sunday night at 12:00pm.
2. The Company has a five-day processing period between the date payroll ends and the actual date direct deposits are made to the employee's bank account.

#### **Overtime**

Where an hourly employee is required or permitted to work in excess of eight hours in any day or 40 hours in one pay week, he/she shall be paid in respect of such work at a rate of wages not less than (a) in the case of overtime work performed on any public holiday or fixed day off, twice their regular rate of wages; (b) in any other case, one and one-half times their regular rate of wages *provided that* an employee who is entitled to a share of the service charge shall be paid at his/her regular rate of pay other than in respect of their fixed day off in any week.

Holiday hours or vacation hours are not included in the overtime calculation. All overtime must be pre-approved by the manager before it occurs. Overtime work that was not firstly approved by the manager will, if subsequently approved by the manager, be paid at the rates stated above; otherwise, it will not be paid.

#### **Paychecks**

1. For the convenience of employees, the Company shall exclusively utilize a direct deposit plan. Direct deposit allows employees to have their paycheck deposited into their bank account of their choice automatically on payday. The direct deposit money is available at the employee's bank on the morning of each payday for their use. Check stubs can be printed for the employee's records. Under no circumstances can employees be paid by cheque or cash.
2. Employees must notify their manager if a paycheck is in error for any reason. Any errors will be corrected on the next paycheck.

3. Each employee is responsible for any personal status changes that affect paychecks. Correct personal information will ensure that their files are up-to-date and employees are responsible for reporting any changes in their name, address, telephone number, direct deposit bank account number, etc., to their manager immediately.
4. Upon termination or resignation, final paychecks will be issued during the next regular pay cycle.

## **Payroll Deductions**

The law requires that the Company makes certain deductions from every employee's paycheck. These deductions shall automatically be calculated and deducted from employee's pay and shall include but not be limited to the employee's mandatory NIB contributions.

The Company reserves the right to recover any overpayment of wages, bonuses and/or holiday entitlement from employee's pay or require a repayment from employees in respect of uniform costs, any over payments of wages bonuses and holiday entitlement or any other monies owed, or deemed to be owed by the employee to the Company. Paycheck deductions may also be taken by the Company to pay off a debt owned by an employee to the Company or any of its subsidiaries.

The Company withholds the right to deduct money from an employee's wages if that employee fails to return company property, including but not restricted to uniforms, accreditation and equipment.

## **Compensation Policy for Hourly Paid Employees**

### **1. Wage Grades**

- a) All employees will be compensated based on wage grade guidelines. No employee's compensation will exceed wage grade guidelines under any circumstances.
- b) Employees may be hired at a rate ranging from the bottom of the grade to the midpoint based on their manager's discretion and the employee's experience.
- c) An employee whose rate reaches the top of the grade will remain at that wage level until the grades are adjusted or the employee is moved to another job classification.

### **2. Wage Increases and Evaluation**

After hire, employees will be evaluated at the end of the initial 180-day trial period and annually thereafter. Pay increases may be issued during these evaluations based upon performance.

### **3. Job Classifications**

- a) Hourly restaurant job classifications:
  - Busser;
  - Runner;
  - Bar-back;

- Steward;
- Waiter;
- Line Server;
- Bartender;
- Cashier;
- Hostess;
- Assistant Butcher;
- Line Cook;
- Cook;
- Desert/Pantry;
- Prep Cook; and
- Action Station Server.

## **Resignation**

Employees who voluntarily elect to resign should give at least two weeks' notice. Employees must submit their resignation notice in writing accompanied with their reasons for leaving the Company. Failure to give adequate notice will impact future consideration for rehire.

Management reserves the right to waive the two-week notice period, grant immediate resignation and acknowledge that adequate notice was given. Vacation time may not be used as part of the two-week notice.

The Company may rehire past employees based on previous performance and work history. Rehired employees will be considered new employees with respect to seniority and will have to complete a 180-day trial period.

## **BENEFITS**

### **Meal**

The Company will provide each staff with one meal per working shift.

### **Public Holidays**

Employees will be expected to work on all public holidays declared in the Commonwealth of the Bahamas and full-time employees will be given preference in scheduling during public holiday days.

[If a public holiday falls on a day on which an employee would ordinarily work, the Company shall pay (i) employees who do not work on the public holiday, at least the wage that such employees would ordinarily have received for work on that day; and (ii) employees who do work on the public holiday at least twice their regular rate of wages.]

### **Holiday Entitlement**

1. Salary & Salaried Management:

Full-time employees salaried Management who have been with the Company for a continuous period of one year or more but less than seven years shall be entitled to two weeks paid leave per year (not including public holidays) and all employees who have been with the Company for a continuous period of seven years or more shall be entitled to three weeks paid leave per year (not including public holidays).

2. Full-Time Hourly Paid Employees:

Full-time hourly paid employees who have been with the Company for a continuous period of one year or more but less than seven years shall be entitled to two weeks paid leave per year (not including public holidays) and all employees who have been with the Company for a continuous period of seven years or more shall be entitled to three weeks paid leave per year (not including public holidays).

3. Part-Time Employees:

All part-time employees who have been continuously employed by the Company for six months or more but under one year are entitled to one week paid leave. All part-time employees who have been continuously employed by the Company for one year or more but under seven years are entitled to two weeks paid leave.

### **Sick Leave**

An employee who has been continuously employed by the Company for at least six months shall be entitled to one week of paid sick leave in any year where he/she is prevented by illness from performing his/her duties *provided, however*, that no employee shall be entitled to receive payment in respect of sick leave which is only one day long unless he/she can provide the Company with a medical certificate. An employee shall not be entitled to accumulate their sick leave entitlement from year-to-year.

The Company may, on processing a claim for sick leave by an employee, require such employee to be examined by an independent physician and may refuse such leave if the physician is of the opinion that the employee is fit for work.

### **Maternity Leave**

After completion of at least twelve months of continuous employment with the Company, every female employee of the Company shall, in addition to their annual holiday entitlement, be entitled to maternity leave upon delivering to the Human Resources Department:

- (a) a certificate issued by a medical practitioner setting forth the expected date of her confinement; or
- (b) a certificate issued by a medical practitioner or a midwife setting forth the actual date of her confinement.

Where an employee, by reason of geographical or other circumstances beyond her control, is unable to produce such certificates as are mentioned above, the Company may accept such

other evidence produced by such employee as reasonable proof of her entitlement to maternity leave.

Should the above conditions be met, then the employee shall be entitled to paid maternity benefits once in every three years in accordance with the National Insurance Act.

Except where the employee otherwise desires, maternity leave shall be for a period of not less than twelve weeks and shall be so arranged that the employee is allowed:

- (a) such period, not less than one week, as she desires before the expected date of confinement; and
- (b) a period of not less than eight weeks from the date of confinement.

However, where confinement takes place without an employee having been granted maternity leave or the period of maternity leave before confinement amounts to less than four weeks, the period of leave after confinement shall, if the employee so desires, be extended so that the total period of leave does not amount to less than twelve weeks.

Where an employee has been granted maternity leave and the date of confinement is a later date than the date stated in the certificate issued by a medical practitioner as being the date on which confinement was expected, her maternity leave shall be extended to include the period that elapsed between those dates.

Where an employee has been granted maternity leave and the employee dies during such leave, the guardian of the child shall be entitled, at a minimum, to any unpaid maternity benefits due to the mother from the Company and the National Insurance Board.

### **Personal Leave of Absence**

With the prior approval of management, an employee who has been continuously employed by the Company for at least six months is entitled to a personal leave of absence without pay for a period not exceeding twelve weeks per annum.

#### **1. Requesting Leave for a Serious Health Condition**

An employee may take a personal leave of absence because of a serious health condition. A serious health condition is defined as a condition which requires in-patient care at a hospital residential medical care facility or a condition which requires continuing care by a licensed professional. The Company may require an employee to provide a doctor's certification of the serious health condition.

Except where leave is not foreseeable, all employees requesting leave must fill out and submit a Leave Request Form and take the form to their manager with a copy to the Human Resources Department.

When an employee plans to take leave under this policy, the employee must give the Company 30 days' notice. If it is not possible to give 30 days' notice, the employee must give as much notice as is practical.

If an employee fails to provide 30 days' notice for foreseeable leave with no reasonable excuse for the delay, the leave request may be denied until at least 30 days from the date the Company receives notice.

While on leave, employees are requested to report monthly to the Company regarding the status of their medical condition and their intent to return to work. Whether such leave of absence will be granted with pay or without pay will be at the sole discretion of the Human Resources Department.

## 2. Fitness for Duty Certification

When leave is taken due to an employee's own serious health condition, as defined by this policy, the employee must present a certification form signed by the employee's health care provider that the employee is able to resume work before returning to work.

## 3. Employee Status after Leave

At the end of the leave period, an employee who takes leave under this policy will be able to return to the same job or a job with equivalent status, pay, benefits and other employment terms.

## 4. Failure to return to work after leave of absence

If the employee does not return to work at the end of the twelve weeks, employment may be terminated by the Company. Employees who are inactive from payroll and have not been approved for a personal leave of absence will be terminated after one week.

## **Compassionate Leave**

An employee who has been continuously employed by the Company for at least six months is entitled to a leave of absence without pay for a period not exceeding one week per annum following:

- a) the birth of a child; or
- b) the death or illness of a child, spouse or parent.

The Company reserves the right to be provided with evidence of such birth, death or illness, as the case may be.

## **Jury Duty**

The Company will not pay employees during any time that they are required to perform jury duty.

## **POLICIES**

### **Complaint Procedures**

Complaints will be handled in such a way that they enhance working conditions and provide resolutions to employee problems. The procedures shall be used without fear of reprisal or employment security.

Employees are encouraged to discuss with management any and all problems that they may have in connection with their work. In many instances, management may be unaware of certain problems, and unless employees call them to his/her attention, they may go by unnoticed and uncorrected. If the situation is not resolved, the employee may contact the Human Resources Department. Note: Employees should report any incidents of harassment or discrimination immediately to the Human Resources Department.

Employees may contact the Human Resources Department of the Company for any reason.

### **Behaviours that will Result in Disciplinary Action**

Failure to comply with any rules, guidelines, or procedures in this Handbook will result in disciplinary action. The following is a list of behaviours that may not be included in other sections of this Handbook. These behaviours, if they occur, will result in disciplinary action. This list is not exhaustive of the types of behaviour that may result in disciplinary action but, rather, is provided as a guide to employees to identify areas of concern to management. Management retains the right to take any action permitted by law, including dismissal, for any behaviour, whether related to job performance or otherwise, which adversely affects the reputation or business activities of the Company. This may include some behaviours that occur outside the workplace.

1. Criticizing, condemning, or complaining in a manner that affects employee morale.
2. Any form of bullying.
3. Insubordination – refusal to accept a proper job as instructed by a manager or failure to carry out directives of management.
4. Any form of gambling.
5. Violation of the Company’s Safety or Security Policies.
6. Violation of the Company’s Health & Hygiene Policy.
7. Falsification of company records (this includes applications, time clock edits, and work records).
8. Violation of the Company’s Harassment Policy.
9. Violation of the Company’s Workplace Violence Policy.

### **Disciplinary Suspension of Employees**

1. Performance Problems and Attendance Violations:

Employees who are in violation of the Company’s attendance policy or are experiencing ongoing performance problems may be suspended as part of a progressive discipline process for up to three days. Suspension of this type will be unpaid and, with the prior

approval of the Human Resources Department, any employee may also be suspended a full week, which will also be unpaid, for more serious violations of the attendance policy or ongoing problems relating to performance.

2. Safety Violations:

Employees who are in violation of safety rules of major significance may be suspended for a minimum of three days and up to five days. Suspensions will be unpaid and calculated in one day increments.

3. Wilful Misconduct, and Serious Violations of Workplace Conduct Rules:

Employees may also receive an unpaid suspension for infractions of workplace conduct rules, such as rules prohibiting sexual harassment, workplace violence or drug or alcohol use or for violations of Bahamian laws. This provision refers to wilful misconduct, not performance or attendance issues. Suspensions will be unpaid and calculated in one day increments.

For the avoidance of doubt, if the action or inaction of an employee could also be grounds for a summary dismissal then managers shall have full and absolute discretion to summarily dismiss an employee instead of suspending him/her.

### **Security Policy**

Employees are personally responsible for all Company property, including money that they may handle. This remains the property of the Company at all times along with any equipment, uniform or protective clothing that is provided for an employee's use and the Company reserves the right to require employees to reimburse the Company for any loss of the same.

If an employee is handling cash and is provided with a till, the following rules shall apply at all times:

- All transactions must be registered through the till.
- No money is to be put in the till drawer which is not part of the transaction.
- The till drawer must be kept closed between sales. The till drawer is not to be opened other than a genuine transaction or by an authorised person.
- Only authorised persons may take money from the till.
- Company procedures and policies will be followed at all times.

It is recognised, for reasons of security, that employees must be prepared to be searched by an authorised person at any time or on leaving their place of work. This also applies to personal belongings, any locker or accommodation provided by the Company. If an employee is found to be in the possession of goods without authorisation, that employee may be liable to prosecution.

The Company strongly believes in the protection of its people, products and assets and, as such, it reserves the right to search any member of staff whilst at work. Employees may refuse to be searched but this will affect future offers for work.

The Company operates a zero-tolerance policy on theft and dishonesty.

#### Security Procedures for Staff Employed at Baha Mar Resort & Casino

If employees are required to work at Baha Mar Resort & Casino (“Baha Mar”), the Baha Mar security provider will operate security procedures designed to protect the safety of all staff, visitors and guests entering or staying at Baha Mar which includes the following:

- All staff /contractors will be issued with a security pass which must be worn at all times. This is required for entry to Baha Mar.
- Security passes remain the property of Baha Mar and can be withdrawn at any point without declaring a reason. The transfer of passes is strictly forbidden.
- All security passes must be handed in to the Company’s Human Resources Department when no longer required.
- Terms and conditions of accreditation and entry to Baha Mar must be abided by at all times.

If an employee loses their pass, they must inform the Human Resources Department immediately so that it can be cancelled. The employee will be asked to pay for the cost of a replacement copy to be issued.

#### **Health & Hygiene Policy**

Employees will be expected to act with due care to prevent injury to themselves and others, to report accidents, damage to equipment and potential hazards and to follow agreed working practices.

In particular employees must:

- Wash their hands after visiting the lavatory, after smoking, eating or disposing of rubbish.
- Report any accident, injury, safety hazard incident, near miss or illness to their manager.
- Cover cuts with a waterproof, detectable blue plaster.
- Exercise good hygiene practices and be sure not to risk contamination of food.

Personal Protective Equipment and safety equipment is provided, where appropriate, for employee’s safety. Employees will be expected to comply with all operating instructions and not to intentionally or recklessly interfere with or misuse anything provided in the interests of safety.

Employees must exercise care at all times to ensure the safety and protection of the public, members and staff.

#### Health Certification and Food Safety

All food handlers of the Company must undergo mandatory training from the Ministry of Health to reduce/eliminate food borne illnesses. The Basic Food Safety Course focuses on

strategies to avoid or minimize food contamination, thus preventing food-borne illnesses. The importance of proper storage, prevention of cross-contamination and good personal hygiene is emphasized. After completing the course, participants are eligible for a Food Handler's Certificate and will be able to:

- discuss food borne illness as a threat to their business and the food service industry, in general;
- outline general characteristics of potentially hazardous foods;
- discuss the relationship between personal hygiene and food contamination;
- identify ways to prevent and reduce time and temperature abuse of food and cross-contamination in the flow of food through an establishment; and
- describe proper cleaning and sanitizing methods.

Employees hereby agree to notify their manager when they experience any of the following conditions so that the manager can take appropriate steps to prevent the transmission of food borne illnesses:

1. Symptoms and lesions including:
  - Diarrhoea;
  - Fever;
  - Vomiting;
  - Jaundice;
  - Sore throat with fever; and/or
  - Lesion containing pus on the hand, wrist or an exposed body part (such as boils and infected wounds, however small).
2. Medical diagnoses that indicate the following:
  - Typhoid fever (*Salmonella typhi*);
  - Shigellosis (*Shingella* spp.);
  - Shiga toxin-producing *Escherichia coli*;
  - Infection (*Escherichia coli* 0157:H7); and/or
  - Hepatitis A (Hepatitis A virus).
3. The following high-risk conditions:
  - Exposure to or suspicion of causing any confirmed outbreak of Typhoid Fever, Shigellosis, Shinga toxin-producing *Escherichia coli* infection, or Hepatitis A;
  - A household member diagnosed with Typhoid fever, Shigellosis, Illness due to Shiga toxin-producing *Escherichia coli* infection, or Hepatitis A; and/or
  - A household member attending or working in a place experiencing a confirmed outbreak of Typhoid fever, Shigellosis, Shinga toxin-producing *Escherichia coli* infection, or Hepatitis A.

Employees hereby confirm that they are aware and understand their responsibilities as directed by the Ministry of Health and to comply with the same, namely:

- reporting requirements specified above for the symptoms, diagnoses, and high-risk conditions specified;

- work restrictions or exclusions that are imposed upon employees showing or exposed to these symptoms; and
- good hygienic practices.

Failure to comply with the above standards could lead to action by the Company, its guests or the Ministry of Health that may jeopardize employment and may involve legal action against the employee.

## **Safety Policy**

The personal safety of all employees is very important to the Company. The Company strives to create a safe and healthy workplace free of hazards but safety starts with the employee and the Company therefore asks employees to think of safety first before acting or reacting.

Employees are required to comply with all aspects of this policy. Employees are required to participate in safety training and are encouraged to play an active role in safety committee meetings. If injured, employees are required to report injuries, seek treatment, and comply with specific medical recommendations in accordance with Company policy.

The following rules were developed to provide general guidelines for all employees to perform their jobs safely. It is every employee's responsibility to follow these rules and to encourage other employees to follow them as well. Wilful violation of safety rules will result in disciplinary action up to and including termination. The rules are subject to change and will be reviewed periodically.

- a) If employees are unsure how to safely perform any task, ask a manager for direction.
- b) If employees feel that a task is beyond their physical capabilities, ask for help.
- c) Use common sense when performing a job.
- d) Know the location of the nearest First Aid Kit, and notify management if any item needs replenishing.
- e) Practice good housekeeping. All work areas must be neat, clean and organized.
- f) Know the location of the following:
  - Main water shut-off valve;
  - Main gas shut-off valve;
  - Main electrical breakers;
  - Hand-held fire extinguishers; and
  - Fire alarm pull stations.
- g) Do not block fire extinguishers and fire alarm pull stations.
- h) Fire escape routes must be kept clean and clear at all times.
- i) Immediately report any unsafe act or condition to the on-duty manager whether or not an injury has occurred.
- j) Report any injury, whether personal, employee, or guest, to your manager regardless of how minor.
- k) Do not run any equipment unless appropriate safety guards are in place and are operational and you have been trained and certified in the proper operation of the equipment.
- l) Employees must wear appropriate Personal Protective Equipment whenever required. These include, but are not limited to, Company-approved, slip-resistant

- safety shoes, rubber gloves, splash-resistant goggles, hot mitts, cut-resistant gloves, protective aprons, etc.
- m) Employees must wear a seat belt (both driver and passengers) while traveling in a motor vehicle on Company business and abide by all traffic laws.
  - n) Never distract the attention of another worker. Horseplay is a serious violation and will not be tolerated.
  - o) Never run in the workplace.
  - p) Be cautious in congested areas and blind corners.
  - q) Keep the floor clean, dry, unobstructed, and free of any trip and slip hazards. Always use “wet floor caution signs” whenever there is a spill or wet floor slip hazard.
  - r) Follow all security guidelines outlined in this Handbook.
  - s) Help the management team in its enforcement of safety rules. Report weaknesses in safety rules, make suggestions for improvement, and teach fellow employees the safe way to perform a job. Play an active role in the Company’s safety program.
  - t) Keep all chemicals labelled, stored away from food, and covered when not in use.
  - u) Keep all storage areas clean, organized and safe.
  - v) Keep all coolers clean, organized and safe. Do not block cooler aisle ways. Do not store glass containers in coolers.
  - w) All products in coolers must be covered unless they are being cooled on the cooling shelf or a top shelf.
  - x) Keep electrical rooms clear and uncluttered. Electrical panels must be clear 36 inches from the panel to allow easy access for the management team or emergency personnel.
  - y) All garbage bags from restrooms must remain in the container and be taken to the dumpster to be discarded. At no time should the bag be removed from the container and carried by the employee. This policy prevents the employee from being exposed to any hazardous material that may have been discarded in a rest room garbage container.

## **Workplace Violence Policy**

The Company provides a safe workplace for all employees. All employees should review and understand all provisions of this Workplace Violence Policy to ensure a safe workplace and to reduce the risk of violence.

### **Prohibited Conduct**

The Company does not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities. This list of behaviours, while not inclusive, provides examples of conduct that is prohibited.

1. Causing physical injury to another person.
2. Making threatening remarks.
3. Aggressive or hostile behaviour that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.
4. Intentionally damaging the Company’s property or the property of a guest of the Company or the property of another employee.

5. Possession of a weapon while on Company property or while on Company business.
6. Committing acts motivated by, or related to, sexual harassment or domestic violence.

### **Reporting Procedures**

Any potentially dangerous situations must be reported immediately to a manager or the Human Resources Department. Reports can be made anonymously and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed only on a need-to-know basis. All parties involved in a situation will be counselled and the results of investigations will be discussed with them. The Company will actively intervene at any indication of a possibly hostile or violent situation.

### **Individual Situations**

While the Company does not expect employees to be skilled at identifying potentially dangerous persons, employees are expected to exercise good judgment and to inform the Human Resources Department if any employee exhibits behaviour that could be a sign of a potentially dangerous situation. Such behaviours include:

1. Discussing weapons or bringing them to the workplace.
2. Displaying overt signs of extreme stress, resentment, hostility, or anger.
3. Making threatening remarks.
4. Sudden or significant deterioration of performance.
5. Displaying irrational or inappropriate behaviour.

### **Dangerous Situations**

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. If a manager can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, employees should cooperate and follow the instructions given.

### **Enforcement**

Threats, threatening conduct, or any other acts of aggression or violence in the workplace including lying or suppressing information with regards to any form of violence will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action up to and including dismissal and further legal action. Non-employees engaged in violent acts at an employee's place of work will be reported to the proper authorities and fully prosecuted.

### **Harassment Policy**

The Company intends to open and operate a friendly work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere without harassment, bullying or victimisation because of their race, colour, nationality, ethnic origin, religion, belief, gender, sexual orientation, marital status,

disability, age, or membership or non-membership of a trade union. The goal of this harassment policy is to prevent harassment from occurring and to provide procedures for implementing this policy. The Company will not tolerate harassment of its employees by anyone under its supervision.

To ensure such an environment, the Company will not tolerate verbal or physical conduct by an employee or non-employee who harasses, disrupts, or interferes with another's work performance or which creates an intimidating, offensive or hostile work environment. Harassment can involve a single incident or may be persistent.

Unlawful harassment is a form of employee misconduct that undermines the integrity of the employment relationship and will not be tolerated. This behaviour is unacceptable in the workplace itself and in work-related settings as well. Harassment is harmful to employees, employers and customers alike. It can range from extremes such as violent outbursts to less obvious actions such as excluding someone from social activities. It is every employee's responsibility to stand against these behaviours in the workplace and any staff member who violates this policy will be subject to disciplinary action up to and including dismissal.

### **Awareness of the Company's Harassment Policy**

The Harassment Policy will be disseminated to all employees. All managers are responsible for knowing of its existence and substance and are responsible for its implementation. The Harassment Policy applies to all individuals in the workplace.

### **Definition of Harassment**

Harassment includes, but is not limited to, slurs, jokes, or other verbal, graphic or physical conduct relating to an individual's race, colour, religion, age, gender, national origin, disability or other immutable characteristic protected law. Ethnic harassment includes the use of derogatory words or phrases characterizing a given racial or ethnic group. Sexual harassment includes, but is not limited to:

- a) unwelcome sexual advances, requests for sexual favours in exchange for favourable treatment or continued employment or any employment benefit, and all other verbal or physical conduct of a sexual or offensive nature, especially where:
  - i. submission to such conduct is made either explicitly or implicitly a term or condition of employment;
  - ii. submission to or rejection of conduct is used as the basis for decisions affecting an individual's employment;
  - iii. such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
- b) offensive comments, jokes, innuendoes, epithets, derogatory or obscene comments, slurs, or sexual invitations, obscene comments or gestures or verbal abuse, graphic or suggestive language about an individual's dress or body, and all other sexual oriented or offensive statements.

- c) visual conduct such as derogatory or sexual oriented posters, photographs, cartoons, drawings or gestures or other displays in the workplace of a sexually suggestive or offensive nature.
- d) any and all other words or conduct which have the effect of unreasonably interfering with an individual's performance or creating a hostile or offensive work environment including offensive comments or visual depictions as described above among co-workers on social networking sites.

## **Complaint Procedure**

- a) The Harassment Policy encourages individuals who believe they are being harassed to firmly and promptly notify the offender that his/her behaviour is unwelcome.
- b) All complaints of unlawful harassment, as defined in this Handbook, will be investigated promptly and in an impartial and confidential manner by or under the direction of the Company. The person designated to perform harassment investigations will be a qualified member of the Human Resources Department of the Company, hereinafter the "investigator". Special privacy safeguards will be applied in handling all complaints. No person named in a complaint of unlawful harassment shall be involved in conducting or supervising the investigation. Depending upon the circumstances and the nature of a particular complaint of unlawful harassment, the follow-up investigation may be conducted by a designated manager who would be acting under the direction of the investigator.
- c) Procedures:
  - i. Any administrator, manager, or employee who believes that the actions or words of an administrator, manager, employees, or non-employee constitute unlawful harassment has a responsibility to report such an incidence to their manager or to the investigator within three days of the occurrence of the allegation, so the charges can be investigated in a timely fashion. Formal complaints must be in writing.
  - ii. Employees who want to make the investigator aware of a potential unlawful harassment situation but not file a formal complaint should be aware that these allegations may be investigated.
  - iii. It shall be the responsibility of the investigator to promptly and thoroughly investigate any and all unlawful harassment complaints received or referred by other employees.
  - iv. In the case of unlawful harassment complaints lodged by employees with a manager, the manager may, at the complainant's request, attempt to resolve the problem informally. If an informal resolution satisfactory to the complainant is reached, no further investigation or action by the Company is required.
  - v. All other complaints not formally resolved to the complainant's satisfaction will be referred to the investigator who will initiate an investigation that may include, but not be limited to, the following:

- interview of the complainant;
  - interview of the accused; and/or
  - interview of any other person with personal knowledge of the allegation of the complaint
- d) Both the complainant and the person accused of unlawful harassment will be given every opportunity to express themselves during the investigation. They may, if so mutually desired, approach the Human Resources Department during the investigation or after they receive notice of the findings. No attorneys are to be present unless specifically requested.
- e) All employees should be aware that the privacy of the complainant and the person accused of unlawful harassment will be kept as confidential as possible, consistent with the Company's legal obligations and the necessity to investigate allegations and to take disciplinary action. Investigative files will be kept separate from the regular personnel files. In all cases, the charging party and the person accused will be advised of the findings and conclusions.

### **Disposition of Complaint**

- a) The results of any investigation shall be reported in writing and such report shall include a conclusion, a summary of facts upon which such conclusion is based, and a determination as to remediation, if appropriate.
- b) If the investigator concludes that unlawful harassment has occurred, he/she shall determine the appropriate remediation and/or discipline up to and including dismissal.
- c) If the report concludes that no unlawful harassment has occurred, the parties shall be so notified. Under no circumstances shall any record of a complaint which is found to be without basis be released to any person other than the complainant and the accused without the consent of the accused except by Order of the Court.
- d) If the investigation is inconclusive, the same shall be so stated in the report.
- e) Neither the complainant nor the person accused will receive a copy of the final report; however, the findings will be reviewed at the request of either party.
- f) Either party may, if so desired, have his/her comments filed along with the final report.
- g) If the report concludes that unlawful harassment has occurred, then a disposition of the matter will be included with the investigator's final report.
- h) Retaliation taken against individuals who bring unlawful harassment charges or against individuals who assist in investigating such charges is strictly prohibited.

- i) Unlawful harassment charges that are or have been in litigation are beyond the scope of the investigator.
- j) If the report concludes that the accused is not guilty of unlawful harassment and the complaint was fraudulently made or lodged in bad faith, then the complainant may be subject to disciplinary action up to and including dismissal, subject always to any limitations of law. In addition, if the investigator concludes that the accused retaliated against the complainant in any way because of the complaint, then it may determine the appropriate discipline, up to and including dismissal of the accused, subject to any limitations of law.

### **Ethics & Integrity Policy**

The Company may be faced with ethical and legal questions in its business dealings. This is a guide to general questions and concerns that may arise. Since it is difficult, if not impossible to include every situation that may occur, it is imperative that employees consult their manager if they have questions regarding their latitude for decisions in this area.

### **Communication**

If an employee is aware of an unlawful or unethical situation, the employee is responsible for reporting it to their manager as soon as possible. The employee may also report it to higher levels of management. Reports of unlawful or unethical practices will be investigated promptly. The Company will not tolerate any threats or acts of retribution toward any employee for reporting these incidents.

### **Workplace**

The Company works hard to earn and maintain high standards and respect for its reputation. Employees are a very important part of this. The Company expects employees to deal honestly and fairly with all guests, other employees, suppliers, and the community. Any actions on or off the job that adversely affect an employee's performance, the performance of other employees, or the legitimate business interests of the Company will be addressed by the Human Resources Department. If it is determined that the employee has engaged in unlawful or unethical behaviour, disciplinary action will be taken up to and including dismissal.

### **Privacy**

An employee's personnel file contains personal as well as business-related information. Access to these files is restricted to those people who "need to know". Personal information will not be released without the employee's approval except to verify employment or when responding to a legitimate investigative or legal requirements. An employee may review their personnel file at any time upon giving a reasonable notice. Since the Company is required by law to maintain certain employment records, no documents may be removed from the file.

### **Fraud, Theft or Embezzlement**

The Company will not tolerate dishonest practices. This includes, but is not limited to, hours worked, expense reports, deception of numbers, unlawful taking of property belonging to the Company, its employees, guests or suppliers. Disciplinary action will be taken against any offender up to and including dismissal. Any evidence will be turned over to the proper authorities for prosecution under the law and full restitution will be required.

### **Prosecutions and Criminal Convictions**

If an applicant is prosecuted for any offence, other than a minor traffic offence, then that employee must disclose this to a member of the Human Resources Department before commencing employment. Only traffic offences which do not result in an endorsement of an employee's driving licence are considered to be minor.

The Company may need to conduct criminal record or security checks before employment is confirmed. The employee will be informed at the application stage if any such checks are required and employment will only be confirmed once the vetting procedures have been completed and are satisfactory.

If any current employee is charged with a crime (other than a minor traffic offense), then that employee must report being charged with such crime to the Human Resources Department within 72 hours of the employee becoming aware of such charge. Failure to report being charged with such a crime may result in appropriate disciplinary action, including termination of employment. All employees are required to notify the Human Resources Department within 24 hours of the outcome of a criminal case. Failure to report a conviction may result in appropriate disciplinary action, including termination of employment. The Human Resources Department shall review the nature of the crime, the facts and circumstances that can be determined through the investigation process, and make a determination on what, if any, action should be taken regarding the employee's employment status until resolution of the charge. During this process, the Human Resources Department will keep the employee's manager informed of the status of the investigation and will seek input from the manager in making a determination about the employee's employment status.

### **Suppliers/Contractors**

The Company is committed to being aggressive in pursuing the best products and services for each dollar spent. This must be the guiding factor in dealing with suppliers and contractors. Personal relationships or the potential for personal gain must be set aside to make objective decisions. The Company expects employees to be fair and impartial in their dealings with outside concerns.

### **Use of Company Name**

Employees may not represent themselves as an agent or employee of the Company for personal or financial gain unless the same benefits are available to all the employees.

### **Memberships**

Although the Company encourages memberships in community organizations, the Company asks that employees evaluate the organization and their position therein. Before accepting a position in a profit or non-profit organization, employees should consider any potential conflict of interest or the possibility of creating embarrassment or division of loyalty.

### **Confidential Information**

Many employees will come in contact with proprietary and confidential information. It is incumbent upon each employee to maintain strict confidence with such information entrusted to them. Competitors or other groups may attempt to learn about matters which could be used to the detriment of the Company and all employees. Releasing confidential information to unauthorized individuals will result in immediate termination.

### **Media Policy**

Employees are not authorised to contact the media or respond to any media calls without the knowledge and approval of the Company's marketing team. This applies to all media across TV, radio, online and print and includes personal contacts, trade magazines, national and local press.

### **Electronics Policy**

#### **Purpose**

To remain competitive, better serve our customers, and give our talented workforce the best tools to do their jobs, the Company continues to adopt and make use of new means of communication and information exchange. This means that many of the Company's employees will have access to one or more forms of electronic media and services, including but not limited to, computers, e-mail, telephones, cell phones and/or smart phones, tablet devices, voice mail, fax machines, external electronic bulletin boards, wire services, and on-line services including social media (e.g., Facebook, Twitter, Instagram). Unless specifically noted otherwise, the foregoing categories will be referred to collectively as "electronic media and services".

The Company encourages the use of electronic media and services because they can make communications more efficient and effective and because they are a valuable source of information about vendors, customers, technology, and new products and services. However, all employees and everyone connected with the Company should remember that electronic media and services provided by the Company are Company property and their purposes is to facilitate and support Company business.

This policy cannot lay down rules to cover every possible situation. Instead, it is designed to express the Company's philosophy and set forth general principles that employees should apply when using electronic media and services, irrespective of whether it is work-related or personal in nature.

### **Compliance with Related Policies and Agreements**

All other policies contained in this Handbook that might apply to the use of electronic media and services remain in full force and effect. Employees should always adhere to these policies when using electronic media and services. In particular, the following policies should be kept in mind: Workplace Violence, Unlawful Harassment, and Ethics & Integrity. Employees who violate the Company's policies will be subject to discipline, up to and including termination of employment.

## **General Guidelines**

The Company fully respects the legal rights of its employees, including their right to engage in protected, concerted activities, and any part of this policy that may reasonably be construed to interfere with or restrict an employee's legal rights in this regard will not be enforced. In general, what employees do on their own time is their affair. However, activities in or outside of work that affect an employee's job performance, the work performance of others, or the Company's business interests are a proper focus of this policy.

Ultimately, each employee is solely responsible for what he or she posts online. Before creating online content, employees are advised to consider some of the risks and rewards that are involved. Keep in mind that any conduct that adversely affects an employee's job performance, the performance of fellow employees or otherwise adversely affects, customers, suppliers, or people who work on behalf of the Company's legitimate business interests may result in disciplinary action up to and including termination.

### Know and follow the rules

Employees should carefully read this policy and ensure that their postings are consistent with the terms and conditions set forth in this Handbook. Inappropriate postings that may include discriminatory remarks, harassment and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

### Be Respectful

Employees should always be fair and courteous to fellow employees, customers, suppliers or people who work on behalf of the Company. Also, employees should keep in mind that they are more likely to resolve work-related complaints by speaking directly with their co-workers or by utilizing the Company's internal reporting policies and procedures than by posting complaints to a social media outlet. Nevertheless, if an employee decides to post complaints or criticism, he/she should avoid using statements photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, employees or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by law or company policy.

### Be honest and accurate

Employees should make sure that they are always honest and accurate when posting information or news and, if they make a mistake, correct it quickly. Employees should be open about any previous posts that they have altered. Employees should always remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Employees should never post any information or rumours that they know to be false about the Company's fellow employees, customers, suppliers, people working on behalf of the Company, or competitors. Post only appropriate and respectful content.

When using any form of electronic media and services, including social media, all employees must adhere to the following guidelines:

- Maintain the confidentiality of the Company's trade secrets, recipes and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Do not create a link from your blog, website or other social networking site to a website or social media site operated and maintained by the Company without identifying yourself as an employee of the Company.
- Express only your personal opinions. Never represent yourself as a spokesperson for the Company. If the Company is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of the Company, fellow co-workers, employees, customers, suppliers, or people working on behalf of the Company. If you do publish a blog or post online related to the work you do or subjects associated with the Company, make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as "The views, opinions, and judgments expressed in this message are solely those of the author. The message contents have not been reviewed or approved by Titan Hospitality Ltd."

### Using social media at work

Employees must refrain from using social media while on work time or on equipment provided by the Company, unless it is work-related as authorized by the employee's manager or consistent with the terms and conditions set forth herein. Employees are prohibited from using the Company's email addresses to register on social networks, blogs, or other online tools utilized for personal used.

### **Logos and Trademarks**

Employees are prohibited from using the Company's logos, trademarks or other intellectual property in any manner (e.g., posting images to social media sites) for commercial purposes or any purpose not consistent with their legal rights.

### **Personal Use**

Electronic media and services are provided by the Company primarily for employees' business use.

### **Access to Employee Communications**

The Company routinely accesses and/or monitors employee email communications to ensure the appropriateness of such communications. Moreover, individual use patterns – for example, telephone numbers dialled, sites accessed, call length, and time at which calls are made – may be monitored for the following purposes:

1. Cost analysis;
2. Resource allocation;
3. Optimum technical management of information resources; and/or
4. Detecting patterns of use that indicate employees are violating the Company's policies or engaging in illegal activity.

The Company reserves the right, at its sole discretion, to review any employee's electronic files and messages to the extent necessary to ensure electronic media and services are being used in compliance with the law, this policy, and other Company policies.

Employees should not assume electronic communications are private. In fact, employees have no reasonable expectation of privacy in any communications sent or received using electronic media and services that have been provided by the Company, whether at work or during non-work hours. By way of example and not limitation, this includes all phone calls, text messages, emails, and online searches or postings made by an employee using company-provided computers, cell phones or smart phones, tablet devices, or via Internet or data paid for or provided by the Company.

Please keep in mind that courts can subpoena electronic data, history and communications in the process of an investigation or lawsuit. This means that all data, history, and communication (emails sent, websites visited) stored on individual computers or shared network servers could be obtained and potentially made public. It is important to note that information that was previously deleted can remain on an employee's computer or Company network servers and can be accessed and recreated. It is each user's responsibility to use discretion when using Company equipment and when communicating electronically and to understand that using this resource does not ensure confidentiality.

### **Security/Appropriate Use**

Employees must respect the confidentiality of other individuals' electronic communications. Except in cases in which explicit authorization has been granted by management, employees are prohibited from engaging in, or attempting to engage in:

1. monitoring or intercepting the files or electronic communications of other employees or third parties;
2. hacking or obtaining access to systems or accounts they are not authorized to use;
3. using other people's log-ins or passwords; and/or

4. breaching, testing, or monitoring computer or network security measures.

Employees are prohibited from sending emails or other electronic communications that attempt to hide the identity of the sender or represent the sender as someone else.

Employees should not use electronic media and services in a manner that is likely to cause network congestion or significantly hamper the ability of other people to access and use the system.

Please use discretion when sending electronic messages to "groups". Limit addresses to those whom the information pertains.

Any employee obtaining electronic access to other companies' or individuals' materials must respect all copyrights and cannot copy, retrieve, modify, or forward copyrighted materials except as permitted by the copyright owner.

#### Password protection and reporting lost equipment

To ensure the integrity of the Company's communication systems and to prevent the improper access thereto, all employees who use Company-provided computers, cell phones or smart phones, tablets, or similar devices, shall, at all times, ensure that each such device is secured with a password protected locking feature. Thus, for example, if a Company-provided smartphone is misplaced or stolen, any unauthorized person in possession of the phone will not be able to access the Company's communication systems or gain access to proprietary or confidential information without knowing the password and/or PIN to unlock the phone.

In the event that a the Company-provided computer, cell phone or smart phone, tablet or similar device is misplaced, lost or stolen, the employee to whom the device was provided must immediately report the incident to his or her manager, as well as to the Human Resources Department. Failure to do so in a timely manner may result in disciplinary action, up to and including termination of employment.

#### **Participation in On-Line Forums**

Employees should remember that any messages or information sent on Company-provided facilities to one or more individuals via an electronic network - for example, Internet mailing lists, bulletin boards, and on-line services - are statements identifiable and attributable to the Company.

The Company recognizes that participation in some forums might be important to the performance of an employee's job. For instance, an employee might find the answer to a technical problem by consulting members of a newsgroup devoted to the technical area.

Employees should include the following disclaimer in all of their postings to public forums:

"The views, opinions, and judgments expressed in this message are solely those of the author. The message contents have not been reviewed or approved by Titan Hospitality Ltd."

Employees should note that even with the disclaimer, a connection with the Company exists and a statement could be imputed legally to the Company. Therefore, employees should not rely on disclaimers as a way of insulating the Company from the comments and opinions they contribute to forums. Instead, employees must limit their discussion to matters of fact and avoid expressing opinions while using the Company's systems or a Company-provided account. Communications must not otherwise violate this or other policies of the Company.

## **Policy Violations**

Employees violating the Company's' electronic media or services policy are subject to discipline, up to and including termination. Employees using the electronic media or services for defamatory, illegal or fraudulent purposes and employees who break into unauthorized areas of the Company's computer system also are subject to civil liability and criminal prosecution.

## **Drug and Alcohol Testing Policy**

The objective of this policy is to inform employees of the Company's position on the use and abuse of drugs, alcohol and/or other controlled substances, and to advise them of the actions which will be imposed for violations of this policy.

These drug and alcohol testing rules are intended to protect the safety of employees and the general public by ensuring that employees do not use drugs or misuse alcohol. This policy is not, does not represent, and should not be taken as a contract of employment. Violation of this policy may result in disciplinary action up to and including termination.

Any questions regarding this policy or the drug and alcohol testing program and procedures may be directed to the Human Resources Department.

## **Employees Subject to Testing**

This policy applies to all applicants and employees of the Company.

## **Definitions Used in this Policy**

Accident - for the purpose of this policy an accident is defined as an incident involving an employee in which there is either a fatality or an injury to any person as a result of the accident, requiring treatment away from the workplace or scene of the accident, or damage to a Company vehicle whereby it is disabled and is required to be towed from the scene of the accident.

Alcohol - means any alcoholic beverage (beer, wine, liquor, etc.) or over-the-counter or prescription medication containing alcohol, the consumption of which may affect the behaviour, performance and actions of the employee to the extent that he/she may pose a threat to the safety of himself/herself or others, and/or manifests itself with a blood alcohol level ("BAL") of 0.02 or greater.

Controlled substances or illegal drugs - means any controlled substance or drug, the sale, possession or consumption of which is illegal. The term includes prescription drugs not legally

obtained and prescription drugs not being used in the manner, combination or quantity prescribed. It also includes any drug or substance listed as a controlled substance. Drugs include amphetamines, marijuana, opiates, cocaine, and phencyclidine (“PCP”).

Medical Review Officer (“MRO”) - means a licensed doctor of medicine or osteopathy with knowledge of drug abuse disorders that is employed or used by the Company to review drug test results and maintain drug testing files for applicants and employees subject to testing. The MRO shall be familiar with the characteristics of drug tests (sensitivity, specificity, and predictive value), the laboratories running the tests and the medical conditions and work exposures of the employees. The role of the MRO will be to review and interpret any positive test results.

Negative Test Result- in drug testing means a result reviewed by an MRO and determined to have no evidence of prohibited drug use. In Alcohol testing, means a confirmation BAL test result of less than 0.02.

Positive Test Result- in drug testing means a drug test result reviewed by a MRO and verified to have evidence of prohibited drug use. In Alcohol testing means a confirmation BAL test result of 0.02 or greater.

Under the Influence- means, for the purpose of this policy, the employee is affected by a drug or Alcohol, or the combination of a drug and Alcohol, in any detectable manner. A determination of whether an employee is under the influence of drugs or alcohol will be based on specific contemporaneous, articulable observations concerning the appearance, behaviour, speech or body odours of the employee.

### **Alcohol Prohibitions: Prohibited Conduct**

The Company has the right to expect that an employee’s conduct or performance is not impaired by drugs or Alcohol at work. Even mild Alcohol intoxication is likely to result in a lower standard of performance and a potential increase to health and safety risks in the workplace, as judgment and concentration are impaired.

The consumption of Alcohol on duty or reporting for duty Under the Influence of Alcohol is considered a serious issue. In the event that an employee is travelling on any transport supplied or provided by the Company, the Company reserves the right to remove any employee from such transport in the event that he/she is Under the Influence of Alcohol or non-prescription drugs or are abusive to any members of staff or to the provider of transport. Once removed from such transport, it is the employee’s responsibility to make alternative arrangements.

All employees are strictly prohibited from:

1. Reporting or remaining on duty when the employee’s BAL indicates a 0.02 or greater Alcohol concentration.
2. Under no circumstances are employees permitted to consume Alcohol while on duty, in uniform, on Company time or Company premises. Any employee found doing so will be escorted off site and may have the remainder of their shifts cancelled.
3. Employees may not refuse to submit to any Alcohol test required under this policy.

4. Employees are prohibited from engaging in the unlawful or unauthorized possession, manufacture, distribution or sale of Alcohol on Company premises, in Company vehicles or while engaged in Company activities.

### **Drug Prohibitions: Prohibited Conduct**

The use, manufacture, possession or sale of illegal drugs or the deliberate misuse of prescribed drugs and substances such as solvents whilst on Company premises, in Company vehicles or while engaged in Company activities is strictly prohibited. Any employee in breach of these rules will be disengaged and will be escorted off site immediately.

For the avoidance of doubt, all employees are prohibited from reporting for duty or remaining on duty when the employee uses any drugs, on or off the job, except when the use is pursuant to a doctor's orders and the doctor has advised the employee that the substance does not adversely affect the employee's ability to safely perform his/her duties. The employee must also alert Company officials to the use of prescription medications that may impair performance and/or pose a safety hazard.

Prescription medications that cause an employee to be Under the Influence (as defined above) and which are not taken according to specific instructions of the employee's prescribing physician will result in a violation of this policy.

If an employee has a Positive Test Result for drugs and is not dismissed then performing Company duties is prohibited until the employee successfully completes any drug treatment program and such program recommends that the employee returns to work.

### **Drug and Alcohol Testing Procedures**

As required by this policy, employees may be subject to drug and/or Alcohol testing in the following situations:

- Pre-Employment Testing;
- Reasonable Suspicion Testing;
- Post-Accident Testing;
- Return-to-Duty Testing; and
- Follow-Up Testing.

#### 1) Pre-Employment Testing

- a) Each applicant to whom the Company has extended a conditional offer of employment must submit, if requested, to controlled substance testing after the offer of employment but before performing job duties. The employment offer will be conditional upon passing the drug test. Any applicant refusing to be tested will not be hired. All applicants must submit to hair collection for drug screening within 48 hours from the time of notification in order to be considered for employment.

- b) Current employees being transferred or promoted to another job grade may be tested for drugs.
- c) Any applicant returning a Positive Test Result for drugs will not be hired.

2) Reasonable Suspicion Testing: Drugs and Alcohol

- a) Where there is reasonable suspicion that an employee is using drugs or is Under the Influence of Alcohol, the Company will require the employee to be tested for the use of controlled substances and/or Alcohol.
- b) Managers must require an employee to submit to drug and Alcohol testing where there is reasonable suspicion to believe that the Company's drug and Alcohol policy has been violated.
- c) Determination to test will be based on specific contemporaneous, articulable observations concerning an employee's appearance, behaviour, speech or body odours.
- d) The employee must submit to reasonable suspicion drug and Alcohol testing when requested to do so by the Company.
- e) Alcohol testing is authorized only if the observations are made during, just before or just after the employee's workday. The employee, likewise, can only be tested for Alcohol during, just before, or just after the performance of job duties.
- f) The manager or other designated Company official will bring the employee to the collection site for a breath and/or urine sample. The employee will not be allowed to drive himself
- g) If the results of a reasonable suspicion Alcohol and/or drug test result in a Negative Test Result then the employee will be compensated for all time lost from work which can be directly attributed to the request to take the test.

3) Post-Accident Testing/Drugs and Alcohol

- a) Post-Accident tests for Alcohol should be administered as soon as possible after the incident and no later than four hours following an Accident.
- b) Employee's Responsibility:
  - I. All employees will be drug and Alcohol tested as soon as practicable following an Accident (as previously defined) involving the employee when the Accident results in either: (a) fatality, (b) bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident, (c) one or more motor vehicles incurring disabling damage as a result of the

accident, requiring the vehicle to be transported away for the scene by a tow truck or other vehicle.

- II. An employee who is subject to Post-Accident Testing must remain readily available for a drug and Alcohol test or the Company may consider the employee to have refused to submit to testing.
- III. The employee subject to Post-Accident Testing must refrain from consuming Alcohol for eight hours following the accident or until he/she submits to an Alcohol test, whichever comes first.

4) Return-to-Duty Testing: In case of a positive Drug or Alcohol Test:

- a) Under this policy, if an employee is given the opportunity to return to work after having engaged in prohibited conduct regarding Alcohol misuse and/or illegal drug use, he/she shall be required to undergo a return-to-duty Alcohol test indicating a BAL of less than 0.02 or a controlled substance test with a Negative Test Result before the employee returns to duty.
- b) In the event that a return-to-duty test is required, the employee must also have been evaluated by a MRO and have participated in and satisfactorily completed any assistance or rehabilitation program prescribed.

5) Follow-Up Testing

Following a determination that an employee is in need of assistance in resolving problems associated with Alcohol misuse and/or use of controlled substances, the employee shall be subject to a minimum of six random follow-up controlled substance and/or Alcohol tests in over a 12 month period.

6) Confirmation Reanalysis of Test Results

a) Positive Drug Tests

- I. All positive urine drug test results will be confirmed by a laboratory. All confirmed Positive Test Results for controlled substances or illegal drugs will be reviewed by a MRO to determine whether there is any legitimate explanation for the Positive Test Result. This will include a review of the employee's medical history or a review of any other relevant bio-medical factors and all medical records made available by the tested employee.
- II. Employees testing positive will be given the opportunity to discuss with the MRO any legitimate explanation for the Positive Test Result. If the MRO determines that there is a legitimate medical explanation for the confirmed Positive Test Result, the MRO will report the test result to the Company as a Negative Test Result. If the MRO determines that there are no legitimate explanations for the confirmed Positive Test Result, the results will be verified by the MRO.

- III. The MRO may verify a test as positive without having communicated directly with the employee when:
- the employee expressly declines the opportunity to discuss the test; or
  - the designated Company representative has successfully contacted the employee and instructed the employee to contact the MRO and more than five days have passed since the employee was contacted by the Company's representative.
- IV. Upon request by the employee or applicant (within 72 hours of being notified of results), any employee or applicant testing positive for controlled substances will be given a reliable confirmatory urinalysis retest of the sample by a medical laboratory. All costs for the re-test shall be paid for by the employee unless the re-test provides a Negative Test Result. Confirmed Positive Test Results shall be reported to the MRO. If re-analysis fails to detect the presence of the previously confirmed drug, the MRO must cancel the tests and report the cancellation to the Company and employee.

b) Positive Alcohol Tests

If the result of the screening test is a BAL 0.02 or greater, a confirmation test will be performed if requested by the employee or applicant. The confirmation test will be conducted within 30 minutes from the end of the screening test. The confirmation test result is the final result upon which any discipline or other action under the Company's policy shall be based.

7) Inability to Provide Adequate Amount of Specimen/Sample

- a) Drugs: The employee must provide at least 45 millilitres of urine for a drug test.
- If the employee is unable to provide such a quantity of urine then the employee will be instructed to drink a set amount of fluid and, after a period of up to three hours, attempt to provide a complete specimen. For a pre-employment drug test, if an applicant is still unable to provide an adequate specimen then this will constitute a refusal to test and the applicant will be considered ineligible for employment with the Company. For all other types of drug testing, if the employee is still unable to provide an adequate specimen, the MRO will refer the employee for a medical evaluation. If the MRO determines that there is no legitimate medical explanation for the employee's failure to provide an adequate amount of urine, this will constitute a refusal to test and be handled in the same manner as a Positive Test Result.
- b) Alcohol: each employee must blow forcefully into the mouthpiece of the Evidential Breath Testing ("EBT") device for at least six seconds or until the EBT device indicates that an adequate amount of breath has been obtained.

If an applicant fails to provide or is unable to provide an adequate breath sample, then this will constitute a refusal to test, rendering the applicant ineligible for employment with the Company.

If the employee fails to provide or claims that he/she is unable to provide a sufficient amount of breath sample to permit a valid breath test because of a medical condition, the Company will require the employee to be evaluated by a physician. If the physician determines that the employee's alleged medical condition could not preclude the giving of an adequate breath sample, then this will be considered a refusal to test.

#### 8) Specimen Adulteration: MRO/Company Guidelines

In the event the MRO receives a laboratory report indicating the possibility of specimen adulteration, the MRO shall follow procedures outlined below to review and interpret the laboratory report.

- a) Specific Gravity < 1.003 and Creatinine <0.2 G/L: the MRO will report the laboratory findings, including negative and cancelled tests, to the Human Resources Department. The Company may require the donor's next urine specimen to be collected under direct observation procedures. A dilute (specific gravity <1.003 and creatinine <0.2 G/L) may require the individual to submit to another urine specimen collection and test.
- b) Specimen not suitable: in specimen not suitable reports, the MRO should first discuss the test result with the appropriate laboratory forensic toxicologist to obtain more facts or documentation. The MRO should then contact the employee/applicant and inform him/her that the urine specimen was not suitable for testing and will inquire whether medication (e.g. non-steroidal anti-inflammatory agents) or another medical explanation may account for the specimen's unsuitability. If no acceptable explanation for the unsuitability is provided, the MRO will inform the employee/applicant that another urine specimen will be collected under direct observation procedures. The MRO will also report the result to the Company and inform the Company that another urine specimen collection under direct observation is required. If there is an acceptable explanation for the unsuitability of the specimen, the MRO will report the specimen as cancelled.
- c) Specimen adulterated: the MRO will report the result as "specimen adulterated" to the Human Resources Department and inform the Human Resources Department that the laboratory finding constitutes a refusal to submit to testing. Under this policy, the employee will be removed from performing any job function.

#### **Refusal to submit to an Alcohol or Drug Test**

Refusal to submit to an Alcohol or drug test will result in immediate dismissal. Refusal to submit to an Alcohol or controlled substance (drug) test means that an employee:

1. Fails to provide adequate breath for testing without a valid medical explanation.
2. Fails to provide adequate urine for controlled substance testing without a valid medical explanation.
3. Engages in uncooperative conduct that clearly obstructs the testing process.
4. Refuses to sign the drug or Alcohol testing form(s).
5. Misuses Alcohol between initial and confirmatory test.
6. Arrives late or does not arrive at all at the collection site without an acceptable and verifiable excuse.
7. Provides an adulterated specimen (as verified by the testing lab or collection site or MRO) to be tested (includes soap and other substances).

### **Cost of Testing**

1. The cost of the initial urine drug and breath Alcohol testing, unless otherwise specified in this Handbook, shall be borne by the Company.
2. Costs of any Return-to-Duty and/or Follow-Up Testing performed will be paid for by the employee.

### **Compliance as a Condition of Employment**

All employees are hereby advised that full compliance with the Company's Drug and Alcohol Testing Policy shall be a pre-condition of employment and a condition of continued employment with the Company. Any employee who violates this policy shall be subject to discipline up to and including immediate dismissal, even for the first offense. This policy supersedes any written policies issued or included in manuals, hand-outs or individual policies prior to the date that this version of the Handbook was published. This policy is effective immediately upon receipt of the Handbook by the employee. This policy is subject to changes, revisions etc. without prior notice depending on policy requirements.

### **Environmental Policy**

The Company is committed to conducting itself in a responsible manner to protect people and the environment. To this end, the Company, with the full support of its board of directors, aims to conduct all of its operations in a responsible manner in order to reduce recognised hazards and to respect the environment.

The concepts of "environmental best practice" and "duty of care" will be implemented to establish high standards of operation in all the Company's activities for which adherence will be mandatory.

The Company has established the following environmental goals:

- To ensure that all its activities comply with or exceed regulatory controls or codes of practice where they are available. In the absence of specific regulations, all activities are carried out in an environmentally responsible manner to prevent any pollution.

- To conserve natural resources by the use of energy management, recycling and other appropriate means, and to deal with suppliers and contractors who actively share these goals.
- To operate each of its facilities in a responsible manner with due regard to the local community in which it resides and having taken due account of any particular environmental aspects identified at that location.
- To continue to develop and improve its operational standards as a result of both its own efforts and using appropriate, available technological developments.
- To make all employees aware of its environmental policy whilst providing suitable training to improve environmental awareness and to allocate clear responsibilities.
- To operate and continually improve systems and procedures for both operations and their monitoring to ensure adherence to the policy.

### **Environmental Essentials**

Employees can save energy by:

- Keeping pre-heating times for ovens, hobs, grills, fryers etc. to the minimum described below:
  - Large Oven: 10 - 15 minutes
  - Deep Fat Fryer: 5 - 10 minutes
  - Char Grill: 10 minute
  - Griddle: 10 minutes
- Turning off vacuum cleaners when not in use.
- Always using the most suitable sized equipment and using saucepan lids where possible.
- Avoiding using cooking equipment as a substitute for space heating.
- Avoiding using dishwashers on part load.
- Making sure that rates of extraction are controlled.
- Not wasting hot water.
- Making sure that all equipment is turned off when not in use.
- Making sure that lights are turned off when not needed and doors and windows are kept closed.

Employees can save water by:

- Minimising water wastage, including hot water.
- Reporting dripping taps to their manager.
- Using a bowl or sink plug when washing equipment or food rather than running the tap.
- By not overfilling buckets and mop buckets.

Employees can help prevent pollution by:

- Only disposing of wastewater into the designated sinks and drains.
- By only using the correct dilution of chemicals to water as directed according to the manufacturer.

- Cleaning up small spillages immediately and disposing of them in the correct receptacle – if in doubt, ask the manager.
- Reporting any spillages of oil or chemicals immediately to their manager.
- By being fully trained in spill response and knowing the spill response plan.
- Knowing where the spill response kit is located in the unit.

Employees can help reduce waste by:

- By being proactive with new ideas for reducing waste.
- By being aware of all recycling occurring within the unit.
- Making sure all waste is segregated.
- Always using the correct skip or bin for recycling.
- Measuring food waste.

**EMPLOYEES CAN MAKE A DIFFERENCE IF THEY THINK GREEN**