



**Grimsby Downtown Business Improvement Area (BIA)**

**Meeting Date: April 16, 2025**

**Meeting Time: 9 a.m.**

**Meeting Place: Teddy's Sports Bar, 30 Main Street West, Grimsby**

**Open Session Agenda**

**Board members:** Mayor Jordan, Councillor Davoli, Mark Wood, Simon Duong, Christine Kempf, Daniel Vandersteen, Chris Mindorff, Ben Burns, Lisa Sproston

**Staff:** Amanda MacDonald – Executive Director of the Grimsby Downtown BIA, Katie Viccica - Deputy Clerk

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**1. Call the Meeting to Order**

**2. Approval of the Agenda**

**3. Declarations of Pecuniary and Non-Pecuniary Interests**

**4. Closed Session**

- a. Town of Grimsby and Grimsby Downtown Business Improvement Area Memorandum of Understanding – 9 – 9:30 a.m.

Pursuant to Section 239(k) of the Municipal Act, a position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality or local board.(Attachment in Closed Session Agenda Package)

- b. Approval of Closed Session Minutes

- i. Grimsby Downtown Business Improvement Area - November 13, 2024  
(Attachment in Closed Session Agenda Package)

**5. Back to Open Session**

**6. Business Arising from Previous Minutes**

**7. Approval of the Minutes**

- a. Grimsby Downtown BIA Meeting Minutes – March 12, 2025 (Attachment)
- b. Road Construction Business Support Task Force – March 31, 2025 (Attachment)

**8. Delegations/Presentations**

- a. Rebecca Shelley – Grimsby and District Chamber of Commerce Update

**9. Road Construction Business Support Task Force Update**

## **10. Financial Update**

- a. Profit and Loss, Balance Sheet, A/R Aging Summary (Attachments)
- b. Audit - Verbal Update

## **11. Governance**

- a. Regional Recycling Update (Attachment)
- b. Human Resources Manual (Attachment)
- c. Elections Policy (Attachment)
- d. Road Construction Business Support Task Force Updated Terms of Reference (Attachment)

## **12. Beautification Update**

- a. Spring and Summer Flowers
- b. Canada Day Flag Program (Attachment)

## **13. Events**

- a. Easter
- b. Farmers Market
- c. Ladies Night
- d. Storywalk
- e. International Plowing Match (Attachment)

## **14. New Business**

- a. Vice Chair Mark Wood  
Re: Letter of Support

## **15. Next Meeting**

The next meeting of the Grimsby Downtown Business Improvement Area Board is scheduled for Wednesday, May 14 at 9 a.m.

## **16. Adjournment**



**Grimsby Downtown Business Improvement Area (BIA)**

**Meeting Date & Time: March 12, 2025; 9 a.m.**

**Teddy's Sports Bar, 30 Main Street West, Grimsby**

**Board members:** Mark Wood, Vice-Chair  
Mayor Jordan  
Councillor Davoli  
Christine Kempf (exited at 10:08 a.m.)  
Daniel Vandersteen  
Lisa Sproston

**Absent:** Simon Duong, Chair  
Chris Mindorff  
Ben Burns

**Staff:** Amanda MacDonald – Executive Director, GDBIA  
Noah Nickel – Committee Coordinator

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**1. Call the Meeting to Order**

The meeting was called to order at 9:03 a.m.

**2. Approval of the Agenda**

**BIA-25-014**

**Moved by:** Christine Kempf  
**Seconded by:** Daniel Vandersteen

Vice-Chair Wood requested an amendment to the agenda to move Item 6. B. Rebecca Shelley - Grimsby and District Chamber of Commerce Update, to the end of the meeting, immediately following Item 16 Next Meeting.

Resolved that the February 12, 2025, BIA meeting agenda be approved as amended.

**CARRIED**

### **3. Declarations of Pecuniary and Non-Pecuniary Interests**

Mayor Jordan declared a non-pecuniary interest with Item 8 – Beautification Update.

### **4. Business Arising from Previous Minutes**

There was no business arising from previous minutes.

### **5. Approval of the Minutes**

**BIA-25-015**

**Moved by:** Mayor Jeff Jordan

**Seconded by:** Christine Kempf

Resolved that the following minutes be received:

- Grimsby Downtown BIA Meeting Minutes – February 12, 2025
- Road Construction Business Support Task Force – February 24, 2025

**CARRIED**

### **6. Delegations/Presentations**

#### **a. Michelle Seaborn – Farmer's Market**

Michelle Seaborn provided an update on plans for the 2025 and 2026 Farmers Markets, with consideration of the upcoming Downtown Reimagined construction. The first market is on June 5, 2025, and the road closure endorsement will be tabled at the April meeting of the GDBIA.

#### **b. Rebecca Shelley – Grimsby and District Chamber of Commerce Update**

This item was moved to immediately follow Item 16 on the agenda.

#### **c. Councillor Howe – International Plowing Match**

Councillor Howe provided an update on the upcoming 2025 International Plowing Match which is to be hosted September 16 – 20, 2025 by the Township of West Lincoln.

## **7. Road Construction Business Support Task Force**

### **a. Branding RFP Creation**

Member Vandersteen provided the following updates on the Task Force:

- A branding package will be created for communications with members and the public regarding the downtown road construction project, separate from that of the Town of Grimsby.
- The primary focus is to ensure the public is aware that businesses in the downtown area are still open throughout the construction period.
- The Task Force is seeking approval from the GDBIA to create and release an RFQ for the development of the branding package.

**BIA-25-016**

**Moved by:** Mark Wood

**Seconded by:** Christine Kempf

Resolved that the Executive Director create an RFQ for the development of a downtown construction project branding package for use by the Road Construction Task Force and GDBIA.

**CARRIED**

## **8. Beautification Update**

Amanda MacDonald, Executive Director, provided an update to the Board that the removal of the winter holiday décor should be near completion. Flowers and flower baskets have been purchased but planters are still frozen, so they are ready to be planted and hung downtown once the temperature increases.

## **9. Marketing**

Amanda provided an update to the Board that samples from the visual brand identity redesign project will be presented for discussion at their next meeting.

## **10. Events**

### **a. International Plowing Match**

Amanda gave the following update on the International Plowing Match:

- Researching potential shuttle services to take International Plowing Match attendees to and from downtown.
- Discussions on stimulating economic activity downtown should be considered at the next Board meeting.

### **b. Easter**

Amanda spoke to the plans the GDBIA have in place for their upcoming Easter event, which is to be similar in scale and attendance to the Halloween and Christmas events in 2024.

### **c. Spring Ladies Night**

Amanda and Member Kempf discussed the upcoming Ladies' Night event, scheduled for May 2025. It will have a "shop local" theme and will be similar to previous Ladies Night events.

### **d. Storywalk**

Amanda shared that another Storywalk event is planned to take place this summer. Discussions with the Grimsby Public Library and the Grimsby Public Art Gallery are ongoing.

### **e. Music on the Forty**

Vice-Chair Wood spoke to the 2025 Music on the Forty event, set for June. While this event is not hosted by the GDBIA, they are partnering to provide marketing and communications support for the event.

### **f. Happening in Grimsby**

Vice-Chair Wood explained that the Happening in Grimsby is set to take place June 12-14, 2025. This is a different date than had been shared previously.

## **11. Regional Recycling Collection Update**

Amanda provided an update on the cessation of commercial recycling pickup in the Niagara Region:

- The provincial government's effort to require businesses in the province to address their own recycling, offloading the responsibility from municipalities, has been delayed until at least May 2025.
- Despite this impending provincial policy change, businesses in Grimsby will not be affected. Grimsby businesses will continue to have their recycling services handled by the Niagara Region, because of an enhanced commercial recycling pickup agreement that was enacted several years ago between the Town of Grimsby and the Niagara Region, as well as three other local area municipalities.
- The GDBIA will continue to support the efforts of local area municipalities and local area BIA's in lobbying the Niagara Region and the Ontario Government to reverse this policy change and allow existing commercial recycling services to continue.

## **12. Chair's Report - VERBAL UPDATE**

There was no Chair's Report.

## **13. Financials**

Member Vandersteen provided a financial update to the Board, including that a year-to-date budget report is upcoming though it has been delayed. A profit and loss update was attached to this agenda for the Board and members of the public to review.

## **14. Old Business**

Member Vandersteen provided an update on the discussions between the Board of the Happening in Grimsby and the GDBIA about possibilities to collaborate. Member Vandersteen delegated to the Happening Board, and in response they voted in favour of developing a Memorandum of Understanding between the two entities. This process will not begin until after the 2025 Happening Festival.

## **15. New Business**

There was no New Business.

## **16. Next Meeting**

Amanda shared the Town of Grimsby has requested that the next Board meeting date be adjusted, to allow Town employees to make a delegation at the next meeting regarding the Memorandum of Understanding being drafted between the two entities.

### **BIA-25-017**

**Moved by:** Mayor Jeff Jordan

**Seconded by:** Daniel Vandersteen

Resolved that the next meeting of the BIA Board of Directors take place on Wednesday, April 16, 2025, at 9 a.m. at Teddy's.

**CARRIED**

## **Rebecca Shelley – Grimsby and District Chamber of Commerce Update**

Member Vandersteen provided the update on behalf of Rebecca Shelley, Executive Director of the Grimsby and District Chamber of Commerce, who was absent from the meeting:

- The Chamber of Commerce held an All-Candidates Forum during the recent provincial election and have plans to hold one for the upcoming federal election as well.
- They held an International Women's Day Celebration and shared multiple upcoming events that the Chamber of Commerce will be hosting throughout the Spring and Summer of 2025.

### **BIA-25-018**

**Moved by:** Daniel Vandersteen

**Seconded by:** Lisa Sproston

Resolved that the Grimsby and District Chamber of Commerce Update be received for information.

**CARRIED**

## **17. Adjournment**

The meeting was adjourned at 10:19 a.m.



**Grimsby Downtown Business Improvement Area (BIA)**

**Downtown Construction Task Force**

**Meeting Date: March 31, 2025**

**Meeting Time: 10 AM**

**Meeting Place: Microsoft Teams**

**Task Force members:** Mark Wood, Daniel Vandersteen, Rebecca Shelley, Marilyn McCrea, Harley Valentine, Andy Daniels, Brandon Wartman, Shannon Downey, Bryan Macaulay, Michael Palomba

**Staff:** Amanda MacDonald – Executive Director of the Grimsby Downtown BIA,  
Gennasys Smart – Events Coordinator of the Grimsby BIA

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**Agenda**

1. Call to Order
2. Approval of the Agenda
3. Approval of Minutes
4. Declaration of Pecuniary and Non-Pecuniary Interest
5. Updates from Task Force
  - a. Town/Executive Director Update
6. Financial Allocation Discussion
  - Review of available reserve funds.
7. Branding Discussion
  - a. Review and Initial Branding Discussion

b. Discussion on potential marketing materials and communication strategies.

8. New Business

- Open floor for additional topics and discussions.

9. Next Meeting

10. Adjournment

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Meeting Minutes	
Call to Order:	10:05 AM
Roll Call:	Rebecca Shelley, Brandon Wartman, Martin Reid, Christina Davidson, Marvin Ingebrigsten, Fay Hassan, Amanda MacDonald, Andy Daniels, Gordon Lampman, Michael Palomba.
Approval of the Agenda:	<ul style="list-style-type: none"><li>• First: Martin Reid</li><li>• Second: Rebecca Shelley</li></ul>
Declaration of Pecuniary and Non-Pecuniary Interest:	Brandon Wartman's team will be doing the construction.
Updates from Task Force	<p>The Town: Downtown Reimagined website has officially launched as of February 28<sup>th</sup>, 2025.</p> <p>The town is currently advancing the preliminary roadway designs and are meeting with their internal team every two to three weeks to review progress and align on next steps. As part of this process, they are assessing the location of existing waterways and evaluating potential impacts on traffic flow. Will soon get the Grimsby BIA involved.</p>

Financial Allocation Discussion	<p>The BIA has allocated \$30,000 for this year. Can be used for messaging, events, pop ups, etc. As established in the February meeting, the task force would like to utilize a portion of this for task force branding.</p>
Branding Discussion	<p><b>RFP:</b> Amanda has developed the initial content for the RFP and is currently in the process of having it proofread by the BIA team. In the meantime, she has proactively secured the website URL and is working on setting up the associated social media accounts to ensure consistent branding across platforms.</p> <p><b>Confirmation of Name:</b> Lets Dig Grimsby, approved by the task force.</p> <p><b>The Relationship between Downtown Reimagined and Lets Dig Grimsby:</b> Amanda inquired about the relationship between Downtown Reimagined and Let's Dig Grimsby, clarifying that Let's Dig Grimsby is intended to be a communications campaign within the larger Downtown Reimagined project. Michael requested clarification on the timeline; Daniel confirmed it is a short-term initiative.</p> <p>Amanda raised concerns about the potential confusion caused by multiple communication channels, which could dilute engagement and reduce page views. She proposed creating a dedicated page for construction updates branded as "Powered by Downtown Reimagined." Daniel emphasized that Let's Dig Grimsby should be positioned as a BIA campaign rather than a separate entity. Rebecca suggested using the hashtag #LetsDigGrimsby as part of the campaign. <b>Conclusion:</b> Though the taskforce may not want an entirely separate project but more a dedicated page that is "powered by Downtown Reimagined," Amanda will move forward</p>

	<p>with the directive she has been given by the board to submit the RFP and will circulate it to the task force for final review.</p> <p><b>Construction Launch Communications Plan:</b> Amanda requested the development of a document to guide communications at the start of the construction period. The document should outline the planned social media campaigns, including posting frequency, key messaging, and the schedule for sharing Town-related activities and updates. Christine confirmed that she is making one for the town and will have it completed in the next 2 months.</p> <p><b>SEMA:</b> Daniel recommended involving SEMA to support joint branding efforts between the Town and the BIA.</p> <p><b>Staying Aligned:</b> The group agreed on the importance of ensuring synergy and clear messaging, given the number of stakeholders involved.</p>
New Business	<p><b>Community Event Presence:</b> Daniel emphasized the importance of having a consistent presence at all major community events, including the International Ploughing Match, Easter Event, Story Walks, The Happening, Music on the Forty, and Go Green through Come Alive Outside. He suggested setting up a booth at each event to provide information and engage the public about the upcoming construction. Regarding Grimsby Glows, which takes place the day after Halloween, Rebecca expressed interest in having the BIA actively involved in the event.</p> <p><b>Construction Worker Parking:</b> Andy raised concerns regarding parking availability for customers with the</p>

	<p>construction workers presence downtown. Brandon noted that Dossantos has designated specific parking spaces for construction staff and will follow up to ensure developers are adhering to the agreed-upon locations. He also requested to be kept informed throughout the process.</p> <p><b>Handling Business Concerns and Inquiries:</b> Fay inquired about the communication protocol for addressing concerns or complaints from businesses related to construction impacts. She asked whether the task force is responsible for fielding these inquiries and sought clarification on the appropriate messaging, including who should serve as the primary point of contact. In response, Daniel clarified that the task force's purpose is to generate ideas and support engagement initiatives, not to handle or filter complaints. He emphasized that any concerns should be directed to the Town. Martin noted that there is a specific project email set up to receive and manage inquiries, making it the most appropriate channel for concerns. Amanda reinforced that the task force should focus on idea generation, event planning, and social media content rather than responding to complaints.</p>
Next Meeting	April 28 <sup>th</sup> , 2025, at 10 AM
Adjournment	Initiated by Daniel

Grimsby Downtown Improvement Area

Profit and Loss

January 1 - April 6, 2025

	TOTAL
EXPENSES	
Advertising	
Misc. Advertising	28.64
Print & Digital Advertising	212.95
<b>Total Advertising</b>	<b>241.59</b>
Bank charges	122.00
Legal and professional fees	475.00
Office expenses	739.80
Other general and administrative expenses	
Meeting Expenses	450.00
Website	233.00
<b>Total Other general and administrative expenses</b>	<b>683.00</b>
Payroll Expenses	165.78
Taxes	1,216.61
Wages	17,003.20
<b>Total Payroll Expenses</b>	<b>18,385.59</b>
<b>Total Expenses</b>	<b>\$20,646.98</b>
OTHER EXPENSES	
DIA Special Events	2,528.97
<b>Total Other Expenses</b>	<b>\$2,528.97</b>
<b>PROFIT</b>	<b>\$ -23,175.95</b>

# Grimsby Downtown Improvement Area

## Balance Sheet

As of April 6, 2025

	TOTAL
<b>Assets</b>	
Current Assets	
Cash and Cash Equivalent	
Chequing	120,403.66
<b>Total Cash and Cash Equivalent</b>	<b>\$120,403.66</b>
Accounts Receivable (A/R)	
Accounts Receivable (A/R)	11,007.36
<b>Total Accounts Receivable (A/R)</b>	<b>\$11,007.36</b>
GIC Contribution	5,000.00
Invested in Capital Assets -DIA	-3,553.43
Year End Surplus/Deficit	-13,720.36
<b>Total Current Assets</b>	<b>\$119,137.23</b>
Non-current Assets	
Property, plant and equipment	
Downtown Beautification	3,052.80
Decoration Planters/Hanging Baskets	4,277.50
Lighting Program	7,000.00
<b>Total Downtown Beautification</b>	<b>14,330.30</b>
Equipment	20,901.55
Accum Amortization	-17,348.00
<b>Total Equipment</b>	<b>3,553.55</b>
<b>Total Property, plant and equipment</b>	<b>\$17,883.85</b>
<b>Total Non Current Assets</b>	<b>\$17,883.85</b>
<b>Total Assets</b>	<b>\$137,021.08</b>
<b>Liabilities and Equity</b>	
Liabilities	
Current Liabilities	
Accounts Payable (A/P)	
Accounts Payable (A/P)	780.00
<b>Total Accounts Payable (A/P)</b>	<b>\$780.00</b>
Credit Card	
BMO Commercial Mastercard	1,914.19
<b>Total Credit Card</b>	<b>\$1,914.19</b>
Downtown Improvement Area Levy 2	-1,088.47
GST/HST Payable	-2,319.32
GST/HST Suspense	-63.67
Payroll Liabilities	-480.85
Federal Taxes	5,301.55
Ontario WSIB	262.53
<b>Total Payroll Liabilities</b>	<b>5,083.23</b>
<b>Total Current Liabilities</b>	<b>\$4,305.96</b>

# Grimsby Downtown Improvement Area

## Balance Sheet

As of April 6, 2025

	TOTAL
Non-current Liabilities	
Downtown Improvement Area Levy 1	-86,293.60
Due To/From General Fund	197,140.02
<b>Total Non-current Liabilities</b>	<b>\$110,846.42</b>
<b>Total Liabilities</b>	<b>\$115,152.38</b>
Equity	
BIA Projects & Stabilization Reserve	-183,495.36
Opening Balance Equity	305,157.16
Transfers to Reserves	11,346.89
Retained Earnings	-87,964.04
Profit for the year	-23,175.95
<b>Total Equity</b>	<b>\$21,868.70</b>
<b>Total Liabilities and Equity</b>	<b>\$137,021.08</b>

# Grimsby Downtown Improvement Area

## A/R Aging Summary

As of April 6, 2025

	CURRENT	1 - 30	31 - 60	61 - 90	91 AND OVER	TOTAL
Toronto Metropolitan University		11,007.36				\$11,007.36
TOTAL	\$0.00	\$11,007.36	\$0.00	\$0.00	\$0.00	\$11,007.36



Downtown Grimsby BIA  
160 Livingston Ave, Grimsby, ON L3M 4G3  
[www.grimsbydowntown.com](http://www.grimsbydowntown.com)

April 17, 2025

Honourable Todd McCarthy, MPP  
Minister of Public and Business Service Delivery and Procurement  
5th Floor, 777 Bay St.  
Toronto, ON M7A 2J3

Re: Advocacy for Recycling Services for Commercial Areas

Dear Minister McCarthy,

As Executive Director of the Downtown Grimsby BIA, representing more than 250 small businesses and property owners, I am writing to echo the growing concerns across Ontario regarding the exclusion of small businesses and other non-eligible sources (e.g., places of worship and community organizations) from eligibility under Ontario's new Blue Box Regulation (O. Reg. 391/21).

We urge the Province to reconsider this framework and ensure that commercial areas like ours continue to have access to equitable and cost-effective recycling services. At a minimum, we recommend that Circular Materials and producers be required to allow co-collection of residential and non-eligible recyclables to maintain practical and environmentally responsible recycling standards.

Downtown Grimsby is the heart of our community's economic and cultural life. The shift from including non-residential sources in curbside recycling programs poses several challenges to our businesses and the municipality. Beginning in 2026, requiring separate collection for commercial recyclables will result in duplicative systems, adding unnecessary greenhouse gas emissions, increasing financial pressure on small businesses, and operational confusion—especially in areas where commercial and residential uses intersect.

In addition, the financial burden of creating alternative recycling systems will likely fall on municipalities and, ultimately, taxpayers. Many small businesses, particularly in the wake of the pandemic, will not have the means to secure private haulers or transport their recyclables to regional depots. The likely result will be a reduction in recycling

participation and an increase in landfill waste, contrary to the province's broader environmental goals.

Niagara Region has demonstrated the success and efficiency of co-mingled collection systems, servicing residential and non-residential properties. The inability to add new non-eligible sources during the transition period presents a barrier for communities like ours. Furthermore, the post-2026 requirement to separate these streams introduces significant logistical and cost-related hurdles, particularly when factoring in long lead times on new collection vehicles and escalating contract rates. The Region has indicated that collection costs for non-eligible sources could double or even triple, rendering recycling inaccessible for many small downtown businesses.

Given these realities, we respectfully request that the Province consider expanding producer responsibility to include non-eligible sources currently served by municipal systems. We recommend requiring producers and collection systems to permit the co-collection of eligible and non-eligible materials to maintain operational efficiency and sustainability. We also encourage broader consultation with municipalities, BIAs, and community organizations to collaboratively design a more inclusive, practical, and environmentally responsible recycling framework.

On behalf of the Downtown Grimsby BIA, I thank you for your attention to this critical matter. I would welcome the opportunity to speak with you or your team further and provide any additional information that may assist in finding a meaningful solution.

Sincerely,  
Amanda MacDonald  
Executive Director  
Downtown Grimsby BIA  
289-251-9574  
amanda@grimsbydowntown.com

CC:  
Premier Doug Ford  
Brock Hamley, Ministry of the Environment  
Sam Oosterhoff, MPP, Niagara West  
Jeff Burch, MPP, Niagara Centre  
Wayne Gates, MPP, Niagara Falls  
Jennie Stevens, MPP, St. Catharines  
Jim Bradley, Chair, Niagara Region  
Cheryl Ganann, Mayor, Town of Grimsby  
Rachel Vraithwaite, OBIAA



## **Employee Policy Handbook**

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# 01. INTRODUCTION

This Employee Handbook provides guidance on the policies, procedures, and expectations within our organization. It is intended to support a positive and productive work environment. However, this manual does not supersede or replace any individual employment contracts or legally binding agreements. In cases where discrepancies may arise between this manual and an employment contract, the terms of the employment contract shall prevail. This document should be regarded as a complementary resource to clarify our standards and support employees in understanding our shared workplace principles.

## Company Mission

At the Grimsby Downtown BIA (GDBIA), our mission is to foster a vibrant and thriving downtown community by supporting local businesses, attracting visitors, and enhancing the downtown experience for all. We strive to be a catalyst for economic growth and cultural enrichment, creating a destination where residents and visitors alike can shop, dine, and enjoy unique events that celebrate the heart of Grimsby. Through innovative programs and strong partnerships, we aim to strengthen the connection between our businesses and the community they serve.

## Company Vision

The Grimsby Downtown BIA envisions a future where the downtown core is a dynamic hub of economic activity, cultural vibrancy, and community pride. We are dedicated to creating a destination that seamlessly blends heritage with innovation, offering unique experiences for residents and visitors alike. By supporting local businesses, hosting engaging events, and enhancing public spaces, we aim to inspire a sense of belonging and connection. Through collaborative partnerships, strategic investments, and a commitment to sustainability, we empower our downtown to grow, thrive, and leave a lasting, positive impact on the Grimsby community for generations to come.

## Employee Policy Handbook

This Employee Handbook serves as a comprehensive guide to GDBIA's current practices, procedures, and policies. The policies outlined within this Handbook form the basis of our employment relationship and are considered contractually binding. Additionally, all sections of this Handbook complement relevant federal and provincial legislation.

Employees are responsible for familiarizing themselves with the contents of this Handbook and are encouraged to consult their supervisor for clarification on any policies or for questions not addressed within it. As legislation, business needs, and economic conditions evolve, GDBIA will review, update, and communicate any changes to policies on a regular basis.

## 02. CODE OF CONDUCT

### Code of Ethics

At GDBIA, we are dedicated to fostering a culture of integrity, respect, and excellence in everything we do. This Code of Ethics outlines our core standards and expectations, guiding our employees to act responsibly and uphold our values in all professional activities.

**1. Integrity and Accountability**

We conduct our work with honesty and transparency, honouring our commitments and taking responsibility for our actions. Trust is the foundation of our relationships with clients, colleagues, and partners.

**2. Respect and Inclusivity**

We are committed to creating a respectful, collaborative, and inclusive environment where everyone feels valued. GDBIA does not tolerate discrimination, harassment, or any conduct that undermines the dignity of others.

**3. Legal and Ethical Compliance**

We strive to conduct our work responsibly, respecting applicable laws and company policies. Our commitment to ethical practices strengthens GDBIA's reputation and credibility.

**4. Commitment to Quality and Excellence**

We are dedicated to delivering high standards of work, consistently aiming for quality and continuous improvement. Every employee is expected to take pride in their work, representing GDBIA with excellence.

## **Accessibility for Ontarians with Disabilities (“AODA”) Policy**

### **PURPOSE:**

The purpose of this Policy is to outline GDBIA’s commitment to promoting accessibility, equal participation, and inclusion as inherent rights for persons with disabilities by implementing the requirements of the [Accessibility for Ontarians with Disabilities Act](#), 2005 and its regulations (“AODA”).

### **SCOPE:**

This Policy is applicable to all GDBIA employees, temporary and seasonal staff.

### **DEFINITIONS:**

**Accessibility:** A product, device, service, or environment which is available to as many people as possible. Accessibility is concerned with inclusiveness and barrier-free design (the identification, removal, and prevention of barrier). Accessibility can be viewed as a person’s access to and benefit from a system or entity in a way that upholds the principles of dignity, independence, integration and equality of opportunity.

**Disability:** Any degree of physical disability, infirmity, malformation, or disfigurement resulting from bodily injury, birth defect, or illness. This includes, but is not limited to, diabetes mellitus, epilepsy, brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impairment, and physical reliance on a guide dog or other animal, wheelchair, or other remedial appliance or device. Additionally, disability encompasses any condition of mental impairment or developmental disability, learning disabilities or dysfunctions in understanding or using symbols or spoken language, mental disorders, and any injury or disability for which benefits were claimed or received under the [Workplace Safety and Insurance Act](#), 1997. This comprehensive definition recognizes both visible and invisible disabilities, ensuring equal opportunity and treatment for all individuals.

### **BACKGROUND:**

The AODA is a law concerning accessibility relating to services, facilities, buildings, employment, structures and premises.

### **STATEMENT OF COMMITMENT:**

GDBIA is committed to the principles of integration and equal opportunity. We will attempt to ensure that all individuals are treated in a manner that upholds their dignity and independence. Our organization is committed to addressing the accessibility needs of persons with disabilities in a timely manner by identifying, preventing, and eliminating barriers to accessibility. We will meet our accessibility obligations under the AODA. Furthermore, we strive to cultivate a culture of respect and acceptance for accessibility within our organization.

### ***Employment Policy: General Requirements***

The AODA provides for the development, implementation, and enforcement of accessibility standards to achieve accessibility for persons with disabilities. GDBIA must meet general requirements in the five following key areas:

- Information and Communications
- Employment
- Transportation
- Design of Public Spaces
- Customer Service

### ***Training Requirements***

GDBIA will provide online training on the AODA requirements as they pertain to individuals with disabilities.

### ***Recruitment, Assessment, and Selection***

GDBIA will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available upon request for the interview process and for other candidate selection methods. Where an accommodation is requested, GDBIA will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of GDBIA's Policy and supports for accommodating people with disabilities.

### ***Accessible Formats and Communication Supports for Employees***

GDBIA will ensure that employees are aware of our policies related to employees with disabilities and any change and/or updates to this Policy as they occur.

If an employee with a disability requests it, GDBIA will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed to perform their job, and;
- Information that is generally available to all employees in the workplace.

GDBIA will consult with the employee making the request to determine the best way to provide accessible format or communication support. GDBIA will ensure feedback processes are accessible for employees with disabilities who require alternate formats or communication support upon request.

### ***Performance Management and Career Development and Advancement***

GDBIA will consider the accessibility needs of employees with disabilities when implementing performance management processes, offering career development, or advancement opportunities as required.

### ***Redeployment***

The accessibility needs of employees with disabilities will be considered in the event of redeployment. Individual accommodation plans will be consulted as required.

### **RESPONSIBILITIES:**

The responsibility for the application, interpretation, and monitoring of compliance with this Policy rests with Human Resources/Executive Director. This Policy will be reviewed regularly to ensure that it reflects GDBIA's current practices and legislative requirements.

Information regarding this Policy will be posted on our website to inform the public that the documents are available upon request. Any questions about this Policy or reports of noncompliance should be directed to the Executive Director.

## Confidentiality and Release of Information Policy

### PURPOSE:

The purpose of this Policy is to outline GDBIA's commitment to maintaining the confidentiality of sensitive information and ensuring its appropriate use and release. This Policy aims to safeguard sensitive information, including personal, financial, and organizational data, to uphold the privacy rights of individuals and the security of GDBIA's operations. It establishes standards and procedures for protecting data, ensuring compliance with relevant privacy laws and regulations. All information management practices at GDBIA will adhere to principles of integrity, discretion, and accountability.

### SCOPE:

This Policy applies to all GDBIA employees, temporary and seasonal staff. It encompasses all forms of information, whether stored electronically or in hard copy and extends to interactions with internal and external parties.

### DEFINITIONS:

**Confidential Information:** Any data or material that is not publicly available and is considered sensitive or privileged, including but not limited to personal information, financial records, proprietary business data, and internal communications.

**Personal Information:** Recorded information about an identifiable individual including, but not limited to, information relating to the individual's age, sex, marital or family status, education, employment history, address, telephone number, or financial transactions in which the individual has been involved.

**Release of Information:** The act of disclosing or providing access to confidential information to authorized individuals or entities, in accordance with established procedures and legal requirements.

**Disclosure:** The act of revealing or providing access to confidential or private information by any method, including verbal, written, or electronic means, in accordance with legal, regulatory, and company policies. Disclosure involves sharing information that was previously restricted or protected to authorized individuals or entities.

**Intellectual Property:** Refers to creations of the mind made in the course of employment for which exclusive rights are recognized under law. These creations can include inventions, literary and artistic works, designs, symbols, logos, names, and images used in commerce. Intellectual property is protected by various legal mechanisms, including the [Copyright Act, 1985](#), [Trademarks Act, 1985](#), and/or the [Patent Act, 1985](#). These protections grant the creator or owner exclusive rights to use, produce, and distribute their creations, preventing unauthorized use by others and encouraging innovation and creativity.

### BACKGROUND:

Relevant Legislation that has guidelines on the protection and retention of related documents:

- [Employment Standards Act, 2000 \("ESA"\)](#)
- [Occupational Health and Safety Act, 1990 \("OHSA"\)](#)

- [Workplace Safety and Insurance Act, 1997](#) (“WSIA”)
- [Human Rights Code, 1991](#) (“OHRC”)

While our internal Policy outlines our approach to document protection and retention, it does not supersede relevant legislation or the common law. Instead, it serves as an internal guideline to ensure compliance with legal requirements, with relevant legislation taking precedence.

### ***Confidentiality:***

Employees acknowledge that they will acquire information about matters that are confidential and not generally known to persons outside of GDBIA. Disclosure of such information may be harmful and damaging to GDBIA.

Employees are prohibited from disclosing any such information to third-parties without proper authorization from management or using such information for personal gain or to further an outside enterprise.

Confidential information may include but is not limited to:

- The identity of customers and suppliers as well as prospective customers and suppliers;
- Information concerning pricing and sales policies, techniques and concepts, including cost information in respect to products/services;
- Name and addresses, terms of contracts, buying habits and preferences of customers and suppliers of the company; and/or
- Any other material information gained throughout the course of employment that may not be known to persons outside of the company.

When an employee is in doubt as to whether certain information is confidential, they should ask the appropriate management personnel before making any disclosure(s).

## **ARTIFICIAL INTELLIGENCE**

Employees must handle all data utilized by Artificial Intelligence (“AI”) systems in strict accordance with confidentiality agreements. AI systems must be implemented and operated to ensure the protection of sensitive information from unauthorized access or disclosure. Any incidents of data breaches or misuse of AI systems must be promptly reported to the relevant management team or compliance officer, who will oversee resolution efforts and ensure appropriate compliance measures are taken.

### ***Electronic Communications and Internet Use:***

GDBIA encourages employees to use the internet and e-mail to access information needed to conduct business and, when appropriate, for business-related correspondence. Electronic communications systems, and all messages generated on or handled by them, are the property of GDBIA.

During employment with GDBIA, employees may participate in, or individually invent, intellectual property, inventions, processes, procedures, etc. All such intellectual property created in the course of their employment is owned exclusively by GDBIA. All employees agree to disclose such property to GDBIA immediately upon invention or discovery and to execute such documentation as is required to secure ownership in favour of GDBIA. All intellectual property

is governed and protected by the overarching applicable legal frameworks listed above. As with written mail, employees must ensure that the content of electronic and voice mail messages is accurate and consistent with standards expected of the employee. Employees are strictly prohibited from leaving or sending messages that are profane, illegal, unethical, offensive, discriminatory, harassing or abusive.

When communicating outside of GDBIA, employees should use discretion when leaving confidential telephone messages because other parties could access them.

When using electronic methods of communication, employees should be aware that these are not fully secure mediums in which to send confidential information. Unencrypted messages transmitted through the internet may be accessible to unauthorized individuals. Therefore, employees should evaluate the need for encryption or other protective measures to safeguard sensitive information.

The following terms and conditions apply to all employees who use these systems:

1. GDBIA retains the right to access or monitor any communication or information stored on or passing through the company's systems and employees have no expectation of personal privacy with regards to the information stored on GDBIA's systems.
2. GDBIA's electronic communication systems are intended to be used for business-related activities only. Incidental personal use is permitted as long as it does not consume more than a trivial amount of resources, does not interfere with productivity, and does not preempt business activity. Incidental personal use includes maintaining a list of personal as well as business commitments in a calendar or organizer file or use of e-mail for short personal notes.
3. Downloading and the installing of software through the internet carries the risk of virus infection of our systems. Permission must be received from the IT Department/Provider before proceeding. Virus detection programs should be used when downloading software.
4. Bringing in outside storage devices with content modified on other systems is prohibited; however, if necessary, and with managerial permission, virus detection must be performed prior to use with GDBIA's systems.
5. Employees are prohibited from tampering, moving, reconfiguring or doing anything else that could damage computers, printers and other equipment.
6. Company software is not to be copied. It is a criminal offence to violate copyright and licensing agreements.
7. Employees must not attempt to avoid or defeat any internet firewalls used by GDBIA or other security procedures that may now exist or may be implemented in the future.
8. The use of passwords belonging to other employees is strictly prohibited.
  - Upon termination of employment, the employee is required to return all documents, papers, intellectual property, and any other materials containing confidential information that are expressly owned by GDBIA.

### ***Privacy Policy & Release of Information:***

Personal information may be collected, retained, used and disclosed by GDBIA on an "as needed basis" and in accordance with this Policy. This Policy is designed to be in accordance with applicable legislation including but not exclusive to: ESA, OHSA, WSIA, and OHRC.

#### **Retention of Information**

GDBIA will collect personal information directly from the individual to whom it relates and indirectly through supervisors and others within GDBIA, including but not limited to the following purposes:

- processing and assessing applications for employment or transfers within the Company;
- opening and maintaining an employee file;
- completing investigations;
- evaluating performance;
- screening for communicable diseases including, but not limited to, COVID-19;
- coordinating and administering employee programs, such as health plan benefits with third party benefits providers; and
- coordinating and administering payroll services and human resources.

All information will not be retained longer than necessary.

### ***Disclosure/Release of Information:***

Your personal information will not be traded, sold, or leased by GDBIA to any external third parties without first obtaining your express written consent. Your information will only be used or disclosed for GDBIA's legitimate business purposes or as required for employment-related purposes and to meet legal regulatory requirements.

GDBIA may share information with the following parties including but not limited to the following purposes and circumstances, as permitted by law:

- to organizations that perform credit, license, and criminal record checks;
- to third party service providers such as payroll processing companies, financial institutions, and benefits providers;
- to a professional that the organization has contracted with;
- to a government institution or part of a government institution that has made a request for the information and has identified its lawful authority to collect that information;
- to an investigative body, a government institution, or part of a government institution where we have reasonable grounds to believe that the information relates to a breach of an agreement or a contravention of the laws of Canada, a province or a foreign jurisdiction that has been, is being or is about to be committed;
- to a person who needs the information because of an emergency that threatens the life, health or security of an individual;
- to a person where the disclosure is required by law including, but not limited to in response to a subpoena or warrant or an order made by a court; and
- in connection with a sale of all or substantially all GDBIA's assets, a merger, or other significant corporate reorganization.

**CORRECTION:**

Employees will be provided access to their personal information when requested. Human Resources will process requests for correction of an individual's personal information where the individual believes there is an error or omission. All requests of this nature should be directed to the Executive Director via email or written notice.

**COMPLIANCE:**

Improper use or disclosure of confidential information can result in discipline up to and including dismissal, as well as civil or criminal penalties, both for the individuals involved and for GDBIA. Any person who knowingly, recklessly or negligently releases personal or confidential information without appropriate authority may be subject to disciplinary action up to and including termination of the employment contract.

**RESPONSIBILITIES:**

**Employees: Protect privacy in executing operational duties and ensure personal information is handled with care and confidentiality in all GDBIA activities. Ensure the collection, use and disclosure of personal information is consistent with legal obligations as stipulated by applicable laws, statutes, and the provisions of this Policy. Only collect personal information with proper authority and informed consent and only collect information necessary and proper in the discharge of GDBIA functions. Ensure personal information is accessed only as required to carry out assigned duties. Report a potential privacy breach to a supervisor/manager immediately if unauthorized access, collection, or dissemination of information is suspected. Provide assistance when sought to contain and assess impact and response to a potential breach. Take reasonable steps to ensure that personal information is not used unless it is accurate and up to date.**

***Procedure for Responding to a Privacy Breach:***

This procedure will establish a systematic and effective response process to address privacy breaches promptly, mitigate potential harm, and comply with legal obligations and organizational policies.

A privacy breach occurs when personal information is collected, retained, used, disclosed, or disposed of in ways that do not comply with legal obligations or organizational policies. This could occur if information was seized in a cyberattack, stolen (such as through theft of a portable device) or accessed by an employee for improper purposes.

When a privacy breach occurs, the organization will do the following:

1. Identify that a privacy breach has occurred. Any employee who becomes aware of a privacy breach, whether suspected or confirmed, must immediately report it to their supervisor.
2. Initial Assessment: The supervisor will immediately alert relevant staff of the breach, as well as the Executive Director. The supervisor will report the information involved, the number of individuals affected, and the potential risks.
3. Contain the Breach. Once the initial assessment is complete, the nature and scope of the breach should be identified. Determine what personal information is involved in the breach. Corrective action may include:

- a. Ensure that no personal information has been retained by an unauthorized recipient and get their contact information in case follow-up is required.
  - b. Ensure the breach does not allow unauthorized access to any other personal information by taking appropriate action (e.g. changing passwords or identification numbers, or temporarily shutting down a system).
  - c. In a case of unauthorized access by staff, consider suspending their access rights.
  - d. Retrieve hard copies of any personal information that has been disclosed.
- 4. Notify Those Affected by the Breach: The Executive Director will notify those affected as soon as reasonably possible if it is determined that the breach poses a real risk of significant harm to the individual, taking into consideration the sensitivity of the information and whether it is likely to be misused. If law enforcement is involved, ensure the notification will not interfere with any investigations. Notification to affected individuals should include the following:
  - a. Details of the extent of the breach and the specifics of the personal information that was compromised.
  - b. The steps taken and planned to address the breach, both immediate and long-term.
  - c. A suggestion, if financial information or information from government-issued documents is involved, to:
    - i. Contact their bank, credit card company, and appropriate government departments to advise them of the breach.
    - ii. Monitor and verify all bank accounts, credit cards, and other financial transaction statements for any suspicious activity.
    - iii. Obtain a copy of their credit report from a credit reporting bureau.
  - d. Contact information for someone within GDBIA who can provide additional information and assistance, and answer questions.
- 5. Investigate and Respond. Identify and analyze the events that led to the breach. Review GDBIA policies and practices in protecting personal information, privacy breach response procedures, and staff training to determine whether changes are needed. Take corrective action to prevent similar breaches in the future and ensure staff are adequately trained. Maintain thorough records of the breach, response activities, and outcomes.

Breach of this provision will result in employee discipline, up to and including termination.

## Artificial Intelligence Use

### PURPOSE:

The purpose of this Policy is to delineate comprehensive guidelines governing the utilization of Artificial Intelligence ("AI"), with particular emphasis on the handling of sensitive information and company data within AI tools. This Policy addresses the distinctive challenges posed by generative AI and aims to provide employees with a clear framework for its proper application and the safeguarding of corporate information. These guidelines will specify the circumstances under which AI use is authorized, outline the appropriate methods for its deployment, and identify the types of information that must not be entered into generative AI systems or tools.

### SCOPE:

This Policy is applicable to all GDBIA employees, temporary and seasonal staff, who have access to GDBIA's data, including but not limited to electronic, paper-based, and verbal information. It encompasses all forms of data, irrespective of the medium on which it is stored or transmitted. This Policy also governs the use of any third-party or publicly available generative AI tools, as well as other similar applications that emulate human intelligence to generate responses or perform specific tasks.

### DEFINITIONS:

**Artificial Intelligence ("AI"):** Considered a computer technology that learns and sees patterns in data, which can allow it to make sense of language, solve problems, create things and make decisions.

**Generative AI Tools:** Advanced AI applications designed to create new content or data that mimics human-like intelligence. These tools use complex algorithms and machine learning models, such as neural networks, to generate text, images, audio, video, or other types of content. Generative AI tools are capable of performing tasks such as answering questions, drafting documents, designing graphics, and simulating conversations, all based on the data and patterns they have been trained on.

**Hallucinations:** Instances where AI systems generate false answers or information given by generative AI tools. Hallucinations can manifest as fabricated details, incorrect facts, or completely made-up content.

**Stale Information:** Data or knowledge given by a generative AI tool that is outdated or no longer accurate.

### BACKGROUND:

All users of generative AI tools must adhere to applicable laws, regulations, and ethical guidelines concerning intellectual property rights, privacy, data protection, and other relevant areas. We collect, use, and disclose employee personal information solely for purposes reasonably necessary to establish, manage, or terminate employment relationships. Employees are notified of any data collection activities, and the purposes of such collection are clearly explained. GDBIA implements stringent data protection measures to safeguard this information, ensuring it is handled with confidentiality and integrity.

GDBIA currently does not employ AI tools in the hiring process for screening, assessing, or selecting applicants for positions. However, in accordance with the [Employment Standards Act, 2000](#) ("ESA"), any changes to this Policy will be promptly disclosed, with a clear statement included in the relevant job postings.

### ***Artificial Intelligence Use Policy Guidelines:***

#### **Data Protection**

Employees are strictly prohibited from inputting personal or sensitive business information into AI systems. This includes, but is not limited to, customer data, employee records, financial information, and proprietary business data or any other non-public company information. This measure ensures the security and confidentiality of data maintained by GDBIA and is crucial in preserving the integrity of its systems.

#### **Data Security**

This Policy is meant to complement and support other company policies related to data security and confidentiality.

The Data Security Policy includes guidelines for data handling, storage, as well as ensuring data integrity and confidentiality. It also outlines employee responsibilities and compliance requirements with relevant laws and regulations.

Employees should be familiar with and adhere to the guidelines outlined in this Policy and refer to it for more information.

#### **Intellectual Property Rights**

Employees must respect and protect intellectual property rights, both internally and externally. Unauthorized use of copyrighted material or the creation of content that infringes on the intellectual property of others is strictly prohibited. Please see GDBIA's [Confidentiality and Release of Information Policy](#) for further information.

#### **Responsible AI Usage**

Employees are responsible for ensuring that the generated content produced using generative AI aligns with GDBIA's values, ethics, and quality standards. Generated content must not be used if it is misleading, harmful, offensive, or discriminatory. All usage must comply with the [Ontario Human Rights Code](#) ("OHRC"), and the ESA.

#### **Use of Generative AI Tools**

Generative AI tools, while beneficial, do not substitute human judgment and creativity. These tools can provide valuable ideas, guidance, and direction; however, information generated by AI systems should not be accepted at face value or replicated without scrutiny. It is essential to recognize that AI systems are susceptible to "hallucinations," producing inaccurate, misleading, or outdated information. Consequently, all AI-generated responses must be meticulously reviewed and verified by the user to ensure their accuracy and relevance.

Acceptable Uses Include:

- General knowledge questions to enhance your understanding of a topic
- Drafting an email
- Creating formulas for Excel
- Brainstorming ideas
- Formatting help

**Unacceptable Uses Include:**

- Inputting any non-public company into a third-party AI system (financial data, projects, contracts, etc.) or personal information (names, addresses, phone numbers, email addresses, etc.)
- Directly copying and pasting information generated by AI and claiming it as your own work

Every employee is expected to rely on their own abilities and employ critical thinking to perform their duties effectively. In instances of uncertainty regarding acceptable use, employees are encouraged to seek assistance or guidance from their manager.

**Incident Reporting**

Any suspected or confirmed security incidents related to AI usage should be reported promptly to the Human Resources or the Executive Director via email or written notice.

**Compliance**

Employees must comply with this Policy. Failure to adhere to these guidelines may result in disciplinary measures and legal consequences if violated. This Policy may be periodically reviewed and updated to reflect changes in technology, regulations, and organizational needs.

**RESPONSIBILITIES:**

**Managers:** Managers are responsible for overseeing AI usage within their teams, ensuring adherence to Policy guidelines and promoting responsible practices. They provide guidance, monitor compliance, and address any questions related to AI use within their departments.

**Employees:** Employees are responsible for adhering to the guidelines set out in this Policy and other related documents. When utilizing AI tools, employees should be cautious and thorough, and ask for clarification from their managers when needed. They should never be entering sensitive or personal data into these systems. If any data privacy concerns arise, it is the employee's responsibility to report them to their manager.

## Progressive Discipline Policy

### PURPOSE:

This Policy establishes a systematic approach to progressive discipline, designed to identify, address, and correct employee performance and behavioural issues. It aims to foster a respectful and professional work environment while ensuring accountability for individual actions.

Unacceptable conduct includes any violation of Company policies or rules, instances of inappropriate behaviour, or continued substandard work performance. Poor performance may lead to the implementation of a Performance Improvement Plan, which may entail progressively increasing levels of coaching and disciplinary action. Unacceptable performance and behaviour include, but are not limited to, violations of GDBIA's policies and code of conduct, dishonesty, theft, unethical conduct, insubordination, workplace harassment, and workplace violence, all of which will be addressed in compliance with the [Employment Standards Act, 2000](#) ("ESA").

### SCOPE:

This Policy applies to all GDBIA employees.

### DEFINITIONS:

**Progressive Discipline:** Escalating disciplinary consequences that may range from level one (verbal warning) to level four (termination of employment). Discipline is conducted progressively, where appropriate, to allow the employee to take corrective action and improve their performance or behaviour to meet expectations. Progressive Discipline may not be appropriate in all circumstances of employee misconduct.

**Administrative Leave of Absence (Pending Investigation):** The removal of an employee from the workplace is issued when the facts pertaining to a particular incident are being investigated, and, in the supervisor's opinion, the employee should not continue working until the matter is resolved. The investigation may result in the employee being suspended or terminated as assessed on a case-by-case basis.

**Misconduct:** Any behaviour, action, or omission that violates GDBIA's policies, code of conduct or ethical standards and may result in disciplinary action. Misconduct includes but is not limited to insubordination, dishonesty, harassment, discrimination, theft, vandalism, and workplace violence.

### BACKGROUND:

The Policy ensures fairness and equity in the disciplinary process and prohibits any actions that could be construed as discriminatory under the [Ontario Human Rights Code](#) ("HRC"). In cases of termination, the ESA governs minimum entitlements to notice or pay in lieu of notice, ensuring compliance with statutory requirements.

### PROGRESSIVE DISCIPLINE POLICY:

GDBIA is committed to assist employees in resolving conflict and improving performance. During every stage of the progressive discipline, supervisors will work with employees to improve their

performance and provide assistance where appropriate. Depending on the severity of the misconduct or unacceptable performance, management may consider more severe discipline than the standard steps of progressive discipline up to and including termination.

All disciplinary conversations and warnings will include a clear communication of:

- Employee performance expectations; and,
- Supervisor/Company support to be provided to assist the employee in achieving and maintaining performance expectations; and,
- Related timelines (which may include scheduled progress/check-in meetings) for performance expectations to be met by the employee; and,
- Consequences of performance expectations not being met by the employee within the communicated timeline.

### **Verbal Warning**

The purpose of a verbal warning is for the immediate supervisor to address and highlight any existing performance, conduct, attendance issues, or other issues which may be considered for intervention. The supervisor will discuss with the employee the specifics of the problem or the violation of GDBIA's policies or procedures.

The supervisor is responsible for clearly outlining the expectations and the necessary steps the employee must take to improve their performance or resolve the issue. The employee must be informed that this constitutes the first level of the formal discipline process, and that further disciplinary action may be taken if the issue persists.

Issues that may lead to a verbal warning include, but are not limited to, tardiness, unauthorized or chronic absenteeism, use of foul or abusive language, inefficiency, incompetence, negligence, and failure to adhere to the Company's policies and rules. Supervisors are required to document such behaviour in their supervisor logs.

### **Written Warning**

A written warning will provide formal documentation of performance, conduct, or attendance issues, outline potential consequences, and be issued by Human Resources/Executive Director.

The immediate supervisor and Human Resources/Executive Director shall meet with the employee to review any additional incidents or information about the performance, conduct or attendance issues as well as any prior relevant corrective action plans. Supports will be offered to the employee including a mandatory Performance Improvement Plan (PIP). Management will outline the consequences for the employee if they continue to fail to meet performance or conduct expectations, up to and including termination, if corrective action is not taken.

### **Suspension**

In situations where performance, conduct, or safety incidents are particularly severe or detrimental, the most appropriate course of action may be the temporary removal of the employee from the workplace. If immediate action is needed to ensure the safety of the employee or others, the immediate supervisor may place the employee on paid leave pending the results of the investigation.

## **Termination**

The final and most severe step in the progressive discipline process is the recommendation for termination of employment. GDBIA aims to adhere to the progressive nature of this Policy by first issuing warnings and a final written warning before advancing to a recommendation for termination. However, GDBIA reserves the right to combine or skip steps based on the specific circumstances and the seriousness of the offence or combination of offences. Additionally, employees may be terminated from employment without prior disciplinary action with or without cause, depending on the nature of the conduct, provided that GDBIA complies with the ESA. Further, an employee who has been guilty of wilful misconduct, disobedience or wilful neglect of duty that is not trivial and has not been condoned by GDBIA will not be entitled to notice of termination of their employment.

## ***Serious Misconduct***

In most instances of serious misconduct, a suspension or termination of employment with cause will result.

Serious Misconduct includes (but is not limited to):

- Possession of weapons, including firearms and knives, on company property,
- Willful destruction of company property,
- Failing to comply through negligence with company security procedures,
- Violent behaviour, including fighting and making threatening statements, harassment or bullying, as outlined in the Corrective Behaviour Plan.
- Severe Health and Safety Policy violations,
- Job abandonment, including failing to return to work after a scheduled absence (such as vacation or sick leave) and failing to report to work as scheduled, without a reasonable excuse with or without notifying your supervisor,
- Failing to comply with company requests for documents in support of an absence from work, such as medical notes, per GDBIA policies,
- Falsifying work records,
- Theft or misappropriation of company property, documents, and trade secrets, in contradiction of GDBIA policies,
- Violation of our conflict of interest and confidentiality policies, and/or
- Possessing or consuming alcohol or illicit drugs in the workplace (with the exception of medical cannabis being consumed in accordance with a Company approved accommodation program and workplace events)

GDBIA reserves the right to determine the appropriate level of discipline at all times.

## ***Appeals Process***

Employees have the right to present information challenging the grounds for disciplinary action, excluding termination. This process allows employees to provide context regarding extenuating circumstances that may have influenced their performance or conduct issues and seeks to facilitate a fair resolution. Employees may present such information during the relevant meetings or within five business days following each meeting. However, GDBIA retains the sole discretion to review and decide whether to uphold or overturn the disciplinary action in accordance with the ESA.

## **Disciplinary Records**

All records of disciplinary action will remain in the employee's file managed by Human Resources/Executive Director. These files remain the property of GDBIA.

All letters of discipline should be signed by the employee confirming receipt of the letter.

## **RESPONSIBILITIES:**

**Employee:** Employees must maintain behaviour and a level of performance acceptable to the Company's stated policies and guidelines. Employees may appeal a disciplinary consequence to the second-removed supervisor (e.g. the employee's supervisor's manager).

**Managers/Supervisors:** Managers/Supervisors must consult with Human Resources/Executive Director prior to imposing discipline on an employee. Managers/Supervisors must manage and document the performance of all direct report employees. This includes providing the appropriate support to employees to assist them in correcting a performance problem.

Managers/Supervisors must forward all disciplinary letters and/or notices to Human Resources/Executive Director. All disciplinary documentation will remain in the employee's file in Human Resources/Executive Director.

Managers/Supervisors must consult with Human Resources/Executive Director regarding an employee appeal to imposed discipline, and may, as a result of consultation (1) confirm the discipline; (2) vary the disciplinary consequence; (3) retract the discipline; or (4) take any other action deemed necessary in the situation.

**Human Resources/Executive Director:** Human Resources will provide administrative support for this Policy and its associated procedures. This includes maintaining an official record of all performance reviews in each employee's file as well as providing consultative services to management on discipline issues.

They will also answer employee questions regarding this Policy and, as requested, other policy applications to specific cases.

## ***Progressive Discipline Procedure:***

### **Principles**

1. **Timeliness:** Actions should be taken promptly, with minimal delay between identifying an offence and implementing the necessary measures.
2. **Appropriateness and Fairness:** Disciplinary actions must be proportionate to the behaviour, relevant to the offence and the employee's previous record, and free from subjective biases. Measures must also comply with applicable employment legislation, including the HRC, ESA, the [Occupational Health and Safety Act](#), 1990 ("OHSA"), and the [Workplace Safety and Insurance Act](#), 1997.
3. **Consistency:** A consistent approach should be applied uniformly to all employees, regardless of individual manager or supervisor reporting relationships.
4. **Defensibility:** Employees have the right to appeal disciplinary actions. Therefore, a thorough record of all circumstances leading to disciplinary action must be maintained.

5. Consultation: Managers and Supervisors must seek advice and direction from Human Resources/Executive Director before imposing any level of discipline.

### **Discipline Administration**

The Company will adhere to the following line of progressive discipline for performance-related issues unless deemed a severe misconduct by Executive staff. This consists of a multi-step process:

- Verbal Warning
- Written Warning
- Suspension (if warranted)
- Termination

Certain infractions of a more severe nature may occur at an advanced level of progressive discipline. These will be at the discretion of Human Resources/Executive Director.

In all cases where infractions may have occurred, all facts will be carefully reviewed, and the employee will be given full opportunity to explain their conduct before any decision is reached.

All discipline levels followed will be documented, and a copy will be kept in the employee's personnel file. For discipline at steps 2, 3 and 4, a copy will be provided to the employee as well. The warning will:

- Inform the employee that they are not meeting the required standards of job performance;
- Outline what the employee performance expectations are;
- Formally present a performance improvement action plan that must be followed; and
- Formally relate the consequences to the employee if performance and/or behaviour issues are not addressed.
- Provide space for the employee to acknowledge the filed report/plan.

The employee will be provided copies of all progressive discipline documentation, including all PIPs. The Employee will be asked to sign copies of this documentation attesting to the receipt and understanding of the corrective action outlined in these documents.

If the employee indicates at any time that an underlying medical condition is contributing to the behaviour, refer to the Accommodation of Ontarians with Disabilities Policy and contact Human Resources/Executive Director.

## **Dress Code and Personal Hygiene Policy**

### **PURPOSE:**

GDBIA requires all employees to present themselves in a professional manner with regards to attire, personal hygiene, and appearance. These standards are commensurate with our organizational practices of appropriate business conduct, professionalism, and dress code.

### **SCOPE:**

This Policy is applicable to all GDBIA employees, temporary and seasonal staff. GDBIA acknowledges that the [Ontario Human Rights Code](#), 1990 ("HRC") holds precedence over this Policy.

### **COMPANY ATTIRE/DRESS CODE:**

All GDBIA employees are expected to use sound judgment and discretion in selecting their attire during working hours, ensuring it aligns with the professional image of GDBIA. Supervisors are responsible for addressing any instances of inappropriate attire and providing necessary guidance.

This Policy is designed to comply with the *HRC*, ensuring that all employees' rights and accommodations are respected. If this Policy conflicts with an employee's religious beliefs or personal sensitivities, they are encouraged to contact Human Resources/Executive Director to discuss potential accommodations.

### **PROCEDURE:**

The following items are not permitted in any area during normal working hours unless required for an activity (i.e. Event Programming may require gym shoes and sweatpants):

- Sweatpants;
- Pants that expose the midriff or underwear;
- Gym shorts;
- Bicycle shorts or other athletic shorts;
- Low-cut tops;
- Halter tops;
- Tops that expose the midriff or underwear;
- Any form of clothing that is mesh, sheer, see-through, or otherwise revealing;
- Any form of clothing that is generally offensive, controversial, disruptive, or otherwise distracting; and
- Plastic flip-flops/beach footwear.

### **Hygiene**

GDBIA employees are expected to meet hygiene requirements during regular business hours for the duration of their employment. Employees must:

- Maintain personal cleanliness by bathing regularly;
- Perform oral hygiene (brushing of teeth)
- Use deodorant or antiperspirant to minimize body odours;

- Avoid the use of heavily scented perfumes, colognes, and lotions. These can cause allergic reactions, migraines, and respiratory difficulty; and
- Wash hands after eating and after every use of the restrooms.

### **Personal Grooming**

To ensure acceptable standards of personal grooming are met, and that health and safety standards are maintained:

- Clothing must be clean, pressed, in good condition, and fit appropriately;
- Employees must maintain neat and well-groomed hair (including, if applicable, sideburns, moustaches, and beards); and
- Tattoos that are perceived as offensive, hostile, or that diminish the effectiveness of the employee's professionalism must be covered, and not visible to staff, customers, or visitors.

Management reserves the right to require an employee to return home to change if they arrive at work in attire deemed inappropriate.

### **RESPONSIBILITIES:**

**Employees:** Employees are expected to comply with the Dress Code and Personal Hygiene Policy. Employees found in violation are required to promptly address and correct the issue. Repeated violations or significant infractions may result in disciplinary action. Employees who cannot comply with this Policy due to reasons connected to HRC protected grounds are encouraged to approach Human Resources/Executive Director for assistance.

**Management:** Managers and supervisors are responsible for notifying employees in writing when they violate the Dress Code and Personal Hygiene Policy and ensuring compliance.

**Human Resources/Executive Director:** Human Resources/Executive Director will be available to answer any questions employees may have regarding this Policy and to facilitate any necessary accommodations in line with the HRC.

## Email Policy

### PURPOSE:

This purpose of this Policy is to support and delineate the requirements for the acceptable use of email. Email serves as a crucial communication tool for GDBIA, facilitating efficient and effective correspondence both within and outside the Company. This Policy seeks to ensure that email communication is conducted in a professional, respectful, and secure manner, thereby enhancing organizational communication, safeguarding sensitive information, and fostering a positive work environment.

### SCOPE:

This Policy is applicable to all GDBIA employees, temporary and seasonal staff who may access the electronic mail system through a local connection or by remote access.

### DEFINITIONS:

**Multi-factor authentication (MFA):** A multi-step login process that requires users to enter more information than just a password. Users may be sent a code to their personal email or phone number in order to regain access to their GDBIA account.

**Employee Termination:** Employee termination refers to the conclusion of an employee's employment with GDBIA. This includes all forms of departure, such as voluntary resignations, retirements, layoffs, and involuntary terminations. Termination signifies the end of the employee-employer relationship.

### BACKGROUND:

Related legislation includes:

- [Ontario Human Rights Code, 1990](#) ("OHRC")
- Where this Policy conflicts with the above legislation, the legislation will take precedence.

### *Email Policy Guidelines:*

GDBIA email accounts are strictly for organizational use and to further GDBIA activities; personal or private use by employees is prohibited. All email accounts and any information transmitted through them are the exclusive property of GDBIA. Employees have no ownership rights to these emails, which are considered the sole property of GDBIA. Each employee who is issued an email account shall create a password to gain access to such an account. All employees are responsible for managing their email and must take reasonable steps to ensure that email is not transmitted to unnecessary or unintended recipients.

### Email Access

Managers or authorized leadership staff may access an employee's email in certain circumstances. When an employee's email account is accessed, the employee may be notified by their manager as soon as practicable:

- Management needs to temporarily perform an employee's duties when they are ill or to resolve a business crisis when the employee cannot be reached.

- The organization is required by law to supply records of correspondence on a particular matter.

Requests to access an employee's email account for business purposes without their knowledge must be made by the employee's Director or above to Human Resources/Executive Director ("HR"). The Information & Technology ("IT") department/Provider has the right to access an email account if the account poses a threat to the email system with permission from the Executive Director.

#### **Email Access and Termination Procedures**

Upon an employee's termination from GDBIA, the supervisor will notify the IT department/Provider directly or via the ticketing system. This notification will specify the employee's termination date. If the termination is immediate, HR will also inform the IT Manager directly to commence termination procedures without delay. These procedures include deactivating the employee's company accounts and email access. All employees are required to make reasonable efforts to ensure that their business-related emails have been managed appropriately prior to the account being recorded as inactive (i.e. leaving their employment with GDBIA, extended leaves, etc.).

A former employee will never continue to have access to their GDBIA past their separation date from GDBIA. GDBIA reserves the right to access the emails of a former employee to facilitate a smooth transition of operations and company initiatives.

#### ***Prohibited Email Uses***

Employees are not permitted to transmit any email over GDBIA systems that contain illegal, defamatory, insulting, vulgar, rude, disruptive, offensive, derogatory, harmful, or immoral content. Prohibited transmissions include, but are not limited to sexually explicit or sexually-oriented materials, cartoons or illustrations, jokes, romantic-oriented materials, anything that could be deemed to be sexually harassing, any sexual innuendos or references, propositions of love, whether wanted or unwanted, ethnic or racially oriented references or slurs, or any other materials that could be considered by the recipient to constitute sexual harassment or harassing or disparaging based upon any human rights protected ground, including but not limited to: sex, sexual orientation, race, ethnicity, national origin, or religious or political beliefs or practices.

Employees are prohibited from transmitting any email over GDBIA systems that transmit commercial software or any copyrighted material, harvest or generate spam (i.e. unsolicited commercial electronic messages as defined by the Canadian Anti-Spam Legislation) to any email recipients, forging, misrepresenting, obscuring, suppressing or replacing a user identity on any electronic communication to mislead the recipient about the sender, sending "mass email" type messages without approval.

Violations of these policies may subject the employee to discipline under the Company's employment policies, up to and including termination of employment. ☐

#### **RESPONSIBILITIES:**

**Employees:** Responsible for reading, understanding and complying with this Email Policy. They must send emails under their name, protect their passwords, and use their GDBIA email responsibly and appropriately. They must reasonably guard against unauthorized access to their email account by closing their email accounts when away from their computer. Employees

should manage mailbox size by identifying and deleting emails unrelated to GDBIA, unsolicited emails that are not work-related, expired calendar invites, and transitory messages regularly. If employees have any concerns about compliance they should request clarification from their Supervisor.

**Information & Technology Department/Provider:** Responsible for handling requests to create, modify, enable, disable or delete email accounts. IT will provide instructions for using the features of the email system when employees request assistance. IT are responsible for resetting passwords for email accounts, triggering multi-factor authentication (MFA), and enforcing company-wide password changes when necessary.

**Human Resources/Executive Director:** Responsible for informing IT of new hires to identify when a new GDBIA email must be created and when employees depart. The department authorizes and requests access to email messages and file attachments if there is a legitimate need to do so or when investigating misuse or violation of this Policy. The department is responsible for reviewing this Policy and updating it when necessary.

#### ***Hacked Account Procedure:***

1. **Detection:** When an affected employee identifies that their account is hacked or suspects that their account has been hacked, the user will need to notify the IT team either through an IT ticket, by emailing [AMANDA@GRIMSBYDOWNTOWN.COM](mailto:AMANDA@GRIMSBYDOWNTOWN.COM), or through a Teams Message or Call as soon as they notice.
2. **Investigation:** The IT Department/Provider will promptly investigate the reported hacked account to determine the extent of the breach. They will gather information related to the nature of the compromise, any unusual activities observed by the account, and potential points of entry for the hacker.
3. **Containment:** IT will take immediate steps to contain the breach and prevent further damage or data loss by locking their account, resetting their passwords and triggering multi-factor authentication (MFA). Users will be sent a code to their personal email or phone number in order to be able to regain access to their GDBIA account. The user will be required to reset their password to any third-party accounts that the user had access to (for example, DocuSign).
4. **Notification:** IT will notify the Executive Director of the breach and provide information regarding the incident and its impact.
5. **Severe Cases:** Depending on the severity of the breach, IT may enforce a company-wide password change. In this scenario, all employees must comply with the password change.
6. **Monitoring:** Ongoing monitoring of the email system and network traffic should be conducted by the IT Department/Provider to detect any further signs of unauthorized access or suspicious activity following the incident.
7. **Review:** Once the incident has been resolved, a post-incident review should be conducted. To analyze the effectiveness of the response and identify any areas for improvement. This may include implementing additional security controls or providing additional training to employees on cybersecurity best practices.



## Health and Safety Policy

### PURPOSE:

GDBIA is committed to the goal of providing and maintaining a healthy and safe working environment and acknowledges it has a statutory duty to take all reasonable precautions to protect its employees from injury or occupational disease from accidents or incidents. We believe accidents are preventable and active participation at all levels will help ensure accidents are avoided. Supervisors and workers must refrain from any actions or activities that could jeopardize the health and safety of themselves or others and must work to reduce the risk of injury. GDBIA relies upon all employees for their commitment to and compliance with our health and safety policies and practices. Together, we will make every effort to provide the resources necessary to create a safe, healthy, and supportive work environment.

### SCOPE:

This Policy applies to all GDBIA employees, volunteers, temporary and seasonal staff, as defined by the [Occupational Health and Safety Act, 1990](#) ("OHSA").

### DEFINITIONS:

**Accident:** An event that results in injury, illness, or property damage.

**Incident:** An event that could or does result in an injury, illness, or property damage.

**Hazard:** A source of potential damage, harm, or adverse health effects on something or someone.

**Internal Responsibility System:** A system, within an organization, where everyone has a shared responsibility for health and safety as an essential part of his or her job.

### BACKGROUND:

To develop this Policy, GDBIA has consulted the Joint Health and Safety Representative ("JHSC/R") and the following legislation governing workplace violence and harassment in Ontario:

- [The Occupational Health and Safety Act, 1990](#) ("OHSA")
- [Workplace Safety and Insurance Act, 1997](#) ("WSIA")

Workplace health and safety refers to the policies, procedures, and practices in place to protect employees from hazards and ensure a safe working environment. It is important because it helps prevent accidents, injuries, and illnesses, safeguarding the well-being of employees. Effective health and safety measures also promote productivity, reduce liability, and ensure compliance with legal and regulatory requirements. Prioritizing health and safety in the workplace is essential for maintaining a positive and secure work environment.

### *Health and Safety Policy Guidelines:*

GDBIA strives to provide a hazard-free environment and minimize health and safety risks for everyone by adhering to all legislation and, where appropriate, through the development,

implementation and maintenance of internal health and safety work standards, programs and procedures.

Implementation of standards, programs and/or procedures will include a communication strategy and applicable training programs.

### **Accident Reporting & Investigation**

Accident Reporting ensures that all GDBIA employees are protected by the Workplace Safety and Insurance Board (“WSIB”) in the event of work-related injury or illness. Timely Reporting of injuries by Employees and Supervisors ensures the WSIB is notified within the required timeframe by the Company. GDBIA is committed to investigating all work-related injuries and/or illnesses, incidents/accidents, and/or “near misses” that occur in work locations (onsite and offsite) so as to identify all immediate and basic causes and make the necessary recommendations to prevent the injury/illness/incident/accident/near miss from recurring.

### **Joint Health and Safety Committee**

GDBIA maintains a JHSC/R as per the OHSA. The JHSC/R is a forum for bringing the internal responsibility system into practice. The committee will consist of worker and management representatives with at least one certified management and worker member. They will meet at minimum once a quarter to address health and safety issues and provide recommendations to the employer when necessary. The committee will assist GDBIA to:

- Recognize workplace hazards.
- Evaluate the hazards and risks that may cause incidents, injuries and illness.
- Participate in the development and implementation of programs to protect the employees' safety and health.
- Respond to employee complaints and suggestions concerning safety and health.
- Ensure the maintenance and monitoring of injury and work hazard records.
- Monitor and follow up hazard reports and recommend action.
- Set up and promote programs to improve employee training and education.
- Participate in health and safety inquiries and investigations, as appropriate.
- Consult with professional and technical experts.
- Participate in resolving workplace refusals and work stoppages.
- Make recommendations to management for incident prevention and safety program activities.
- Monitor the effectiveness of safety programs and procedures.

### **Health and Safety Communication**

GDBIA encourages open communication on health and safety issues. Open communication is essential to providing an accident-free and productive work environment. Employees are encouraged to inform their supervisor of any matter they perceive to be an actual or potential workplace hazard. Communication can be written or verbal. Employees who voice or identify a Health and Safety concern will not be subject to reprisal or retaliation.

Health and Safety comments will be reported to the JHSC/R and reviewed by the committee and an investigation will be initiated on each reported or potential hazard.

### **RESPONSIBILITIES:**

Employer:

- Identify, control, and monitor all workplace hazards,
- Provide all employees with appropriate support, adequate training, and resources in their specific work tasks to protect their health and safety,
- Foster a workplace culture of safety with appropriate leadership,
- Ensure employees work in compliance with applicable laws, safe work practices and procedures, and
- Cooperate with the JHSC/R and respond to committee recommendations within twenty-one (21) calendar days.

Employee:

- Report unsafe or potentially hazardous conditions, without fear of reprisal, to their Supervisor/Manager,
- Protect their own health and safety by working in compliance with the law, safe work practices, and procedures established by the company, and
- Use appropriate personal protective equipment as required.

Joint Health and Safety Committee (JHSC/R):

- Obtain health and safety related information from the employer, workers, and WSIB,
- Identify and monitor workplace hazards,
- Conduct monthly workplace inspections,
- Make recommendations to the employer on ways to improve workplace health and safety,
- Investigate work refusals, critical injuries, and fatalities.
- For further information, see the [OHSA](#).

## Pay Equity Policy

### PURPOSE:

The purpose of this Policy is to promote equity in compensation practices within GDBIA. This policy aims to eliminate wage disparities based on gender, race, ethnicity, disability under the [Ontario Human Rights Code](#), 1990 (“HRC”) and the [Employment Standards Act](#), 2000 (“ESA”) by establishing transparent and equitable pay practices, we strive to foster a diverse, inclusive, and supportive work environment where all employees are valued equally for their contributions.

### SCOPE:

This Policy applies to all GDBIA employees.

### DEFINITIONS:

Pay Equity: **The principle of providing equal pay for work of equal value.**

Protected Characteristics: **All protected grounds under the HRC.**

Wage Disparities: **Differences in compensation based on factors such as gender, race, ethnicity, disability, or other protected characteristics, which are not justified by differences in job-related qualifications or responsibilities.**

### BACKGROUND:

Our organization will comply with applicable laws and regulations related to pay equity, including, but not limited to:

- [Ontario’s Pay Equity Act, R.S.O. 1990, c.P7](#);
- The [Ontario Human Rights Code R.S.O. 1990, c. H.19](#); and,
- The [Employment Standards Act R.S.O. 1990, c. H.19](#).

### VALUES:

GDBIA supports the principles of pay equity and providing equal pay to all staff for broadly similar work of equal value based purely on each individual’s qualifications.

### Determining Pay Rates

GDBIA is committed to maintaining pay that is competitive with wages paid by similar employers and pays employees in jobs of comparable value equitably in compliance with applicable legislation. The value of positions will be assessed under the four factors used by the Pay Equity Commission: skills, effort, responsibility, and working conditions. GDBIA recognizes that the Pay Equity Act permits differences in pay due to seniority, merit, piecework, or differences not due to gender or another protected characteristic. If GDBIA deems that there is a difference in pay due to these accepted exceptions, then there will be no need for pay equity adjustments to be applied.

### Transparency & Accountability

GDBIA aims to maintain transparency in our compensation practices by clearly communicating to employees how pay decisions are made and providing avenues for employees to raise questions or concerns about pay equity. Managers will ensure compensation decisions within their departments are fair and equitable.

#### **Non-Retaliation**

There will be no retaliation or reprisal against any employee who raises concerns or questions about pay equity.

#### **RESPONSIBILITIES:**

**Management:** Managers are responsible for ensuring that compensation decisions within their departments are fair and equitable. This includes conducting performance evaluations objectively, considering the factors of skill, effort, responsibilities and working conditions when determining salaries, and advocating for pay equity within their teams.

**Human Resources/Executive Director:** The Human Resources/Executive Director is responsible for implementing and enforcing the pay equity Policy. They must take a proactive role in ensuring consistency of application across GDBIA. This includes conducting regular audits of compensation practices, identifying and addressing any wage disparities. Human Resources will provide advice or guidance to on issues or complaints surrounding this Policy.

## Privacy Policy

### PURPOSE:

The purpose of this Policy is to protect and respect the personal information of GDBIA and its employees. This Policy governs the way we collect, use, store and disclose personal information that is obtained in the course of the development, sales, promotion and distribution of our services or in the course of employment.

### SCOPE:

This Policy applies to all GDBIA employees, who may handle, maintain, or have knowledge of any personal information under the Company's care, custody, or control. All persons who collect, access, use, disclose, maintain and dispose of personal information are in a position of trust and must abide by the procedures and practices set out below while handling personal information.

### DEFINITIONS:

**Personal Information:** Any factual or subjective identifying information about an individual or group of individuals. This can include but is not limited to, name, date of birth, address, health related data, accommodation requests, intellectual property of company and client, income, e-mail address, social insurance number, gender, evaluations, and credit records.

**Business Information:** Confidential information related to a specific business that is not readily available to the public, such as names of executive officers, business registration numbers, proprietary information, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

### BACKGROUND:

GDBIA is committed to protecting the privacy of personal information in accordance with the Employment Privacy Agreement signed by all employees upon hire, setting clear expectations for the handling of employee data. This Policy reinforces those terms to ensure transparency, confidentiality, and responsible data management throughout the employment relationship.

### *Privacy Policy Guidelines:*

#### **Informed Consent**

Consent occurs and is considered obtained when an individual provides express written consent, or through an applicable online action. Before being asked to provide consent, individuals will be provided with the reasons their personal information is being collected, how it will be used and stored, and any disclosure or possible disclosure of the information, as stipulated in your employment agreement. If necessary, GDBIA will obtain individual consent if personal information is to be used for any other purpose.

#### **Disclosure**

Under no circumstances will GDBIA sell, distribute, or otherwise disclose personal information, including personal contact information or employee lists, to third parties, unless required to do so by law.

#### **Retention**

GDBIA may retain personal information for the duration it is needed for conducting its business and ensuring statutory compliance.

### **Security**

GDBIA will take reasonable precautions to protect personal information with appropriate security measures, physical safeguards, and electronic precautions.

### **Challenging Compliance**

Any questions or concerns regarding this Policy can be addressed by contacting the Executive Director. GDBIA will respond to concerns about any aspect of the handling of personal information.

### **Freedom of Information Policy Guidelines:**

GDBIA recognizes the importance of public access to information held by the organization.

### **Disclosure of Information**

GDBIA may disclose requested information to the extent permitted by law and subject to any applicable statutory exemptions.

### **RESPONSIBILITIES:**

**Management:** The management team is responsible for overseeing the implementation of this Privacy Policy and ensuring that all employees receive appropriate training on privacy practices.

**Employees:** All employees are responsible for handling personal information in accordance with this Privacy Policy and the applicable privacy laws. They are required to acknowledge and maintain the confidentiality and security of personal information and to only access it on a need-to-know basis.

## Social Media – Personal Use Policy

### PURPOSE:

The purpose of this Policy is to ensure that all staff members and stakeholders of GDBIA are fully aware of their obligations to uphold and enhance the Company's reputation. GDBIA is committed to maintaining a positive public image and has implemented this Policy to educate, inform, and advise employees who manage personal social media accounts (including but not limited to Facebook, Twitter/X, Instagram, LinkedIn, personal blogs, and YouTube) on their compliance with the guidelines established herein on their personal social media use.

### SCOPE:

This Policy applies to all GDBIA employees.

### BACKGROUND:

The widespread use of social media has created new opportunities and challenges for organizations in managing their public image. Given that employees' online activities can reflect on their employers, inappropriate or harmful social media conduct can have significant repercussions. Consequently, this Policy aims to ensure that all employees and stakeholders understand their responsibilities in maintaining a positive online presence. By adhering to this Policy, employees help protect GDBIA's reputation and avoid any actions that may adversely affect the Company.

### DEFINITIONS:

**Personal Use:** The use of social media platforms for personal purposes, unrelated to work-related activities or responsibilities.

**Professionalism:** Conducting oneself in a manner that reflects positively on the individual and the Company, demonstrating respect, integrity, and accountability in all interactions, including those on social media.

**Social Media:** Online platforms and websites that allow users to create and share content, interact with others, and participate in social networking activities. Includes but is not limited to, Facebook, Twitter/X, Instagram, LinkedIn, personal blogs, and YouTube.

### *Social Media - Personal Use Policy Guidelines:*

Company employees who maintain personal social media pages or accounts must comply with the following guidelines as they relate to their association with GDBIA. Employees should be aware that there is no expectation of privacy with regard to comments or statements posted online. Inflammatory comments or unprofessional or disparaging remarks made about the Company, its employees or clients may result in disciplinary action up to and including termination. Employees should follow the guidelines below when making posts or comments on any social media site whether public or private.

Employees must adhere to the following guidelines regardless of whether they explicitly mention the Company by name. Any post, even if it does not reference GDBIA directly, may be traced back to the Company and potentially harm its reputation. If a connection can be

established between GDBIA and a negative or inflammatory post, the employee responsible may face disciplinary action, up to and including termination of employment.

This Policy is not intended to interfere with the private lives of our employees or infringe on their rights. This Policy is designed to ensure that the image and branding of GDBIA are maintained, as well as the health and safety of employees.

### **Prohibited Disclosures**

Employees shall conduct themselves professionally both on and off duty. Where an employee publicly associates with the Company, all materials associated with their page may reflect on the Company.

Please be advised that inappropriate comments, photographs, videos, links, and so on should be avoided. Posts, comments, statements, and/or reactions involving the following will not be tolerated and will subject the individual to discipline:

- Proprietary and confidential Company information;
- Discriminatory statements or comments of a harassing or bullying nature regarding co-workers, management, or clients;
- Any behaviour that may damage the Company's reputation or brand image; and
- Defamatory statements regarding the Company, its employees, or clients;
- Any confidential information, news releases, or other communications as a representative of the Company without prior authorization to act as a designated Company representative.

### **Social Media During Working Hours**

Employees are prohibited from using social media during regular working hours, and employees must limit their use to official breaks as set forth in the [Employment Standards Act, 2000](#) ("ESA"). As Internet access at GDBIA is monitored, please be advised that excessive use of social media for personal reasons could be seen as misappropriation of Company time and resources and may be subject to disciplinary action up to and including termination of employment.

### **GDBIA Devices**

Employees are prohibited from using any personal social media account in any manner on any GDBIA device, except if it is absolutely necessary in the unlikely event of an emergency. Employees should have no expectation of privacy when using any GDBIA device.

### **Social Media Use and Intellectual Property**

Company policies governing the use of copyrighted materials, corporate logos, and other forms of branding and identity apply to electronic communications. Employees are prohibited from using GDBIA protected materials (copyright material, branding, or logos) without prior express written permission. GDBIA strictly prohibits the use of Company-owned computer resources for illegal downloading or uploading of copyrighted materials without express written permission and authorization from the copyright holder. Use of personal social media must not conflict with any existing policies of GDBIA whatsoever. This includes all policies contained within the Company's Code of Conduct.

**RESPONSIBILITIES:**

**Employees:** Employees are responsible for understanding and adhering to the guidelines outlined in this Social Media – Personal Use Policy. It is the responsibility of each employee to ensure that their personal use of social media platforms complies with company policies and does not compromise the Company's reputation or confidentiality. Employees should exercise discretion and professionalism when posting content on personal social media accounts, considering the potential impacts on colleagues, clients, and the Company. Employees must not use any GDBIA device to access personal social media.

**Management:** Upon request by an employee, Managers and Supervisors may provide guidance and support to employees regarding the appropriate use of social media for personal purposes. They should address any concerns or violations of this Policy promptly and take appropriate disciplinary action if necessary.

## Substance Abuse Policy

### PURPOSE:

The purpose of this Policy is to establish guidelines, procedures, and expectations addressing substance abuse within GDBIA. Employees under the influence of drugs or alcohol on the job can pose serious health and safety risks to themselves, their fellow employees and others. This Policy aims to promote a safe, healthy, and productive work environment while providing support and assistance to employees struggling with substance abuse issues. This Policy will provide a framework for education, assistance, rehabilitation and reintegration of employees who struggle with substance abuse.

### SCOPE:

This Policy applies to all employees. It encompasses a broad range of substances, including but not limited to alcohol, marijuana, illegal drugs, prescription drugs, and over-the-counter medications.

### DEFINITIONS:

**Drugs:** Includes narcotics and illegal drugs, legal prescriptions, over-the-counter medications and drugs that cause or have the potential to cause impairments and render an employee not fit for duty.

**Substance Abuse:** The misuse or excessive consumption of alcohol or other drugs or substances, including marijuana, illegal substances or prescribed and over-the-counter medications that may impair performance and safety at work or conduct.

**Unfit for Duty:** Reporting to work affected by the use of, or after-effects of, alcohol or other drugs or substances, including marijuana, illegal substances or prescribed and over-the-counter medications which may impair performance or affect safety at work, or becoming unfit for work over the course of the workday as a result of substances abuse.

### BACKGROUND:

Under the [Human Rights Code](#), 1990 ("HRC"), addiction may be a disability that is a ground from which a person is protected from discrimination and would be accommodated. The HRC requires employers to accommodate the needs of a worker with a disability, up to the point of undue hardship. The [Occupational Health and Safety Act](#) ("OHSA") includes provisions related to ensuring a safe and healthy work environment, which can encompass issues related to substance abuse and impairment.

### RESPONSIBILITIES:

**Management:** Supervisors and Managers must understand the objectives and procedures of the Substance Abuse Policy and related policies. They must monitor job performance and take corrective action in accordance with established practices for dealing with performance or safety concerns. Provide accommodation to employees as appropriate, who may, for example, need temporary alternate placement while seeking substance abuse treatment and participating in aftercare.

**Employees:** Employees must arrive fit for duty and meet satisfactory work performance and attendance standards. They shall perform the duties of their job in a safe manner without risk to their co-workers, the public, or the environment. Employees have a duty to report their use of prescription or over-the-counter medication that may affect their ability to safely perform the duties of their job to their supervisor, before starting their shift.

Employees have the right to refuse work in situations where they believe that a co-worker is putting themselves or others at risk because of substance abuse to the point that health or safety is compromised as per the requirements of the Health and Safety Act.

### ***Substance Abuse Policy Guidelines:***

GDBIA recognizes the serious impact of substance abuse on individuals, workplace safety, productivity, and overall organizational well-being. GDBIA is committed to minimizing the potential harmful effects of substance abuse.

### **Expectations**

The following expectations apply to employees and management alike while conducting work on behalf of the Company, whether on or off GDBIA's premises:

- Employees are expected to arrive to work fit for duty and able to perform their duties safely and to standard,
- Employees must remain fit for duty for the duration of their shift,
- Use, possession, distribution, or sale of drugs or alcohol during work hours, including during paid and unpaid breaks, is strictly prohibited,
- Employees must work safely in accordance with [Section 28](#) of the OHSA,
- Employees are prohibited from reporting to work while under the influence of recreational cannabis and any other non-prescribed cognitive altering substances,
- Use and possession of medically prescribed drugs is permitted during working hours, subject to the terms and conditions of the Company's policies and all applicable legislation,
- Employees on prescribed medication that might create a potential risk of harm, limitation, or restriction which may require modification of duties or temporary reassignment should communicate this to management as soon as possible,
- Employees are expected to abide by all governing legislation pertaining to the possession and use of cannabis,
- Refrain from misusing or being impaired by prescription or non-prescription drugs while they are on duty,
- Notify their supervisor if they suspect that a co-worker is unfit for duty,
- Any employee reporting for work and found to be under the influence of alcohol, illegal drugs or other controlled substances will be asked to leave the premises.

### ***Possession at Work***

To help promote a safe and healthy workplace, GDBIA reserves the right to prohibit certain items and substances from being brought on to or present on Company premises and/or on Company worksites, subject to compliance with the HRC.

Possession of alcohol, drugs, and drug paraphernalia (defined as material or equipment used or intended for use in injecting, ingesting, inhaling, or otherwise introducing a drug, illegal or controlled, into the human body) on Company property and/or Company worksites is

prohibited. This includes attending events as a Company representative. The Company property encompasses all company owned or leased property used by employees, including without limitation parking lots, vehicles, lockers, desks, and closets.

### **Medical Cannabis**

Cannabis is known to be an impairing drug and that when used in the workplace, or coming to work intoxicated will render the employee unfit for duty, and in violation of this Policy. Where an employee has a prescription for medical cannabis, GDBIA may require a copy of their medical documentation and the Company's Accommodation Policy will govern the Company's responsibilities.

### **Duty to Notify**

Employees may be required to notify management if they are using any other legally prescribed or non-prescription drugs that may cause on-duty impairment for the treatment of a medical condition, only if it may cause a risk to themselves or others. Off-duty medical or recreational use of such drugs does not violate this Policy, as long as the employee is fit for duty at all times when they are on duty.

### **Substance Dependency**

GDBIA understands that certain individuals may develop a chemical dependency to certain substances, which may be defined as a disease or disability. GDBIA recognizes that alcohol and drug dependencies are treatable conditions and promotes early diagnosis as early intervention greatly improves the probability of long-term recovery. Any employee who suspects that they might have an emerging drug or alcohol problem is expected and is encouraged to seek appropriate treatment promptly.

The Company will work with any employee who requests accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable, up to the point of undue hardship. Employees are encouraged to communicate any need for accommodation to their supervisor, and to work with them in addressing the concern.

### **Voluntary Identification**

Employees are encouraged to communicate that they have a dependency or have had a dependency so that their rights are protected, and they can be accommodated appropriately. Employees will not be disciplined for requesting help or due to current or past involvement in a rehabilitation effort. Employees with questions on this Policy or issues related to drug and alcohol use in the workplace should raise their concerns with the Executive Director, without fear of reprisal.

All medical information, including disclosure of dependency, will be kept confidential by GDBIA, unless otherwise authorized by law.

### **Employee Right to Accommodations**

GDBIA recognizes that addiction is deemed a disability under the HRC. Accordingly, in administering the disciplinary and other provisions of the Policy, addictions and other substance abuse related to disabilities, such as use of medical cannabis or prescription drugs for chronic pain and debilitating conditions, will be treated as non-culpable violations and employees will be offered reasonable accommodations based on their individual circumstances and capabilities to the point of undue hardship.

### **Disciplinary Investigations**

GDBIA may open a disciplinary investigation to check whether an employee is engaged in substance abuse or otherwise in violation of their fitness for duty obligations under this Policy in response to:

- Complaints or concerns by co-worker, supervisor, etc.,
- Declining performance
- Erratic behaviour
- Involvement in safety incidents including near misses,
- Arrests for impaired driving, drug offences and similar violations, and
- Other indications that the employee has substance abuse issues or is otherwise not fit for duty.

Investigations will be carried out in accordance with GDBIA's Disciplinary Investigation Procedures.

### **Consequences of Violations**

Violations of this Policy are grounds for discipline up to and including termination of employment for just cause, in accordance with GDBIA's Progressive Discipline Policy.

GDBIA reserves the right to place employees with substance abuse issues on administrative leave and enter into Last Chance Agreements offering them the opportunity to return to work if they successfully meet the terms of their reinstatement.

## Workplace Violence, Harassment, and Sexual Harassment Policy

### PURPOSE:

The purpose of this Policy is to outline GDBIA's violence and harassment program, including how incidents of violence and harassment will be handled and investigated. GDBIA is committed to building and preserving a safe, productive, and healthy working environment for its employees, taking all reasonable precautions to protect all GDBIA workers from violence and harassment. This commitment applies to all areas of business and working conditions.

The Company prohibits harassment and discrimination of any kind. The Company also prohibits any type of retaliation against anyone for opposing a discriminatory practice, filing a harassment or discrimination charge or complaint, providing information in a Company investigation of alleged harassment or discrimination, or participating or being a witness in a harassment discrimination lawsuit, hearing, or proceeding.

### SCOPE:

This Policy applies to all GDBIA employees.

### DEFINITIONS:

**Complainant:** A person who has made a complaint about another individual who they believe committed an act of violence or harassment against them.

**Respondent:** A person whom another individual has accused of committing an act of violence or harassment.

**Workplace Harassment:** Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome. It can be a single or repeated incident or action. Workplace harassment can include unwelcome and/or repeated words or actions that are known or should be known to be offensive, embarrassing, humiliating or demeaning to a worker or group of workers. It can also include behaviour that intimidates, isolates or even discriminates against a worker or group of workers in the workplace that are unwelcome.

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

**Workplace Violence:** The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

### BACKGROUND:

To develop this policy, GDBIA has consulted the Joint Health and Safety Committee (JHSC/R) and the following legislation governing workplace violence and harassment in Ontario:

- The [Occupational Health and Safety Act \("OHS"\)](#)
- The [Human Rights Code](#)

Pursuant to the OHS, Ontario employers have responsibilities concerning workplace violence and harassment. Employers must set up and maintain programs to implement workplace violence and workplace harassment policies in consultation with the Joint Health and Safety Committee ("JHSC/R") or health and safety representative, as applicable.

### ***Workplace Violence, Harassment, and Sexual Harassment Policy Guidelines:***

GDBIA will provide all employees with information regarding the Company's violence and harassment prevention practices and procedures. Employees are responsible for adhering to this Policy and should report every incident of violence or harassment immediately to management.

This includes any incidents that have been witnessed, experienced by, or reported to an employee. For the purposes of this Policy, workplace harassment or violence can occur:

- At the workplace,
- At employment-related social functions,
- In the course of work assignments outside the workplace,
- During work-related travel,
- Over the telephone, if the conversation is work-related, or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship.

Violence or harassment in the workplace may be perpetrated by anyone an employee encounters, including clients, co-workers, contractors, volunteers, employers, or supervisors. It may also involve individuals with no formal connection to the workplace, such as strangers or domestic/intimate partners who introduce violence or harassment into the work environment. It is important to note that workplace harassment does not encompass reasonable actions taken by an employer or supervisor in the management and direction of employees or the workplace.

### **Education**

New employees will receive both general and site-specific orientation to the workplace violence and harassment prevention program. Any training developed, established and provided will be done in consultation with, and in consideration of, the recommendations of the JHSC/R.

### **Risk Assessment**

Management (with worker involvement) assesses workplace violence hazards in all jobs, and in the workplace as a whole.

### ***Reporting Incidents of Workplace Violence or Harassment***

An employee who believes they have been subjected to violence or harassment is strongly advised to submit a formal complaint to their Supervisor or Human Resources personnel. This complaint should be accompanied by either a completed "Workplace Harassment Complaint Form" or "Workplace Violence Incident Report," as appropriate (refer to Appendix).

Alternatively, an employee who believes they have been subjected to harassment may choose to address the matter directly with the alleged harasser. This can be done verbally or in writing, clearly detailing the unwelcome behaviour and demanding that it cease immediately. When reporting verbally, the reporting contact, along with the worker complaining of harassment, will fill out the aforementioned complaint form. In cases where the alleged harasser is the employee's supervisor, the employee is strongly encouraged to escalate the complaint directly to a member of the GDBIA Management Team or Human Resources.

#### **Immediate Assistance Procedures**

When an incident of violence has occurred or is likely to occur, and immediate assistance is required, place an immediate call to emergency services by dialling 9-1-1.

#### **Investigation Procedures:**

Once a complaint has been received, GDBIA may complete an investigation. The Organization will conduct any investigation that is appropriate in the circumstances, in a timely manner.

An investigation will generally include:

- Informing the respondent of the complaint;
- Interviewing the complainant and any persons involved in the incident;
- Identifying and interviewing any witnesses; and,
- Obtaining statements from all parties involved.

The above information will be documented and used to determine whether an incident of violence or harassment occurred. If necessary, GDBIA may engage an investigator from outside of the Organization.

A copy of the complaint or a summary of the complainant's allegations will be provided to the respondent, who will be invited to reply in writing to the complainant's allegations. The respondent's reply or a summary of the reply will be made known to the complainant. GDBIA will take all measures to prevent any disclosure of the incident and the identities of the parties involved, unless the disclosure is necessary for the investigation, for taking corrective action or required by law.

#### **Results of Investigation**

Upon completion of an investigation, GDBIA will inform the complainant and respondent (if he/she/they are a worker of GDBIA) in writing of the results of the investigation and any corrective action as a result of the investigation.

#### **Recordkeeping**

GDBIA will ensure that appropriate records of complaints and investigations relating to incidents of violence and workplace harassment are kept, including:

- A copy of the complaint or details about the incident;
- Any records related to the investigation, including notes;
- A copy of the investigation report (if applicable);
- A summary of the investigation results, including the reports provided to the complainant and respondent; and,
- A copy of any corrective action taken to address the complaint or incident.

All records of the investigation will be kept confidential. The investigation documents, including the report should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action or otherwise as required by law.

### **Confidentiality**

Information about complaints shall be kept confidential to the extent possible. GDBIA will not disclose the name of a complainant or a respondent or the circumstances related to the complaint to any person except where disclosure is necessary to investigate the complaint or take corrective action with respect to the complaint or required by law. The Company will only disclose the minimum amount of personal information or details necessary for these purposes. All records of harassment, and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law. The Company will do everything reasonably possible to protect the privacy of any individuals involved and to ensure that complainants and respondents are treated fairly and respectfully.

While the investigation is on-going, the worker who has allegedly experienced harassment, the alleged harasser(s) and any witnesses must not to discuss the incident or complaint or the investigation with each other or other workers or witnesses or anyone else, except their legal counsel, GDBIA's Human Resources personnel, the investigator, or legal counsel, or as required by law. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

### **Control Measures**

Where GDBIA determines that violence or harassment has occurred, control measures will be implemented to eliminate or control the risk of violence or harassment to a worker as a result of the investigation. These control measures will be determined on a case-by-case basis, depending on the situation investigated. Any control measure enacted will be communicated to the complainant and respondent (if he/she/they are a worker of GDBIA), as well as any other employees the measure affects.

### **Disciplinary Measures**

Any disciplinary action will be determined by GDBIA's Senior Management Team and will be proportional to the seriousness of the behaviour or action involved in the incident. If the Company determines that an employee has been involved in an incident of violence or harassment towards another employee, immediate disciplinary action will be taken, up to and including immediate dismissal.

### **Domestic Violence**

If GDBIA becomes aware that domestic violence is likely to expose an employee to physical injury in the workplace, the Company will take every precaution reasonable in the circumstances for the protection of the worker.

### **Recommendations to Victims**

The Company will provide appropriate assistance to any employee who is a victim of violence or harassment. GDBIA recommends that a worker who has been harmed as a result of an incident of violence at the workplace consult their health care provider for treatment or referral for post-incident counselling, if appropriate.

### **The Right to Refuse Unsafe Work**

Pursuant to the OHSA, employees have the right to refuse work if they have a reason to believe that workplace violence is likely to endanger them. Upon refusing to work, the employee must report the circumstance of the refusal to their supervisor. An investigation by GDBIA may follow.

#### **Fraudulent or Malicious Complaints**

It is a violation of this Policy for anyone to knowingly make a false complaint, or to provide false information about a complaint. Unfounded or frivolous allegations may cause both the respondent and the Company significant damage. Any employee who knowingly makes a false allegation related to violence or harassment will be subject to disciplinary action, up to and including termination of employment.

#### **Retribution, Retaliation or Reprisal**

In no circumstances will any person who, in good faith, reports an incident of threats, intimidation, or violence or assists in its investigation be subject to any form of retribution, retaliation or reprisal.

Any person who makes or participates in such retribution or retaliation, directly or indirectly, will be subject to disciplinary action. A person who believes they are subjected to retribution or retaliation should immediately notify the Director of Human Resources or the Executive Director.

#### **Policy Review**

Pursuant to the OHSA, this Policy shall be prominently displayed in a conspicuous location within the workplace. Additionally, this Policy will undergo review on an annual basis or more frequently, as needed, to ensure it accurately reflects the GDBIA prevention program.

#### **RESPONSIBILITIES:**

**Employer:** Ensure that measures and procedures in the violence and harassment prevention program are carried out. Hold management accountable for responding to and resolving complaints of violence.

- Take reasonable steps to ensure compliance by all who have a relationship with the Organization, such as contractors, volunteers, etc.
- Post a copy of this Policy in the workplace.
- In consultation with the JHSC/R, conduct regular risk assessments.
- In consultation with the JHSC/R, establish control measures.
- In consultation with the JHSC/R, establish and deliver training and education.
- Integrate safe behaviour into day-to-day operations.
- Develop a reporting process for incidents of workplace violence and harassment.
- Investigate all reports or threats of violence/harassment in a prompt, objective and sensitive way.
- Report incidents of workplace violence to the JHSC/R within four days if an employee is disabled from performing their own work or receives medical attention as a result of an incident.
- Take corrective action.
- Provide response measures.
- Facilitate medical attention and support for those involved directly or indirectly.

- Ensure any deaths or critical injuries are reported to a Ministry of Labour (MOL) inspector, the police (as required), JHSC/R or H&S representative and trade union, as well as investigated with the JHSC/R. Send the report explaining the circumstances to all parties in writing within 48 hours of the occurrence. Include information and particulars prescribed by the OHSA and regulations.
- Ensure a report goes to WSIB of all accidents where a worker loses time from work, requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.

#### Managers/Supervisors:

- Enforce Policy and procedures and monitor worker compliance.
- Identify and alert staff to violent persons and hazardous situations.
- Investigate all workplace violence using the organization's accident investigation procedure and form, and contact the police as required.
- Facilitate medical attention for employee(s) as required.
- Debrief those involved in the incident either directly or indirectly.
- Contact Human Resources/Executive Director to ensure the employee receives further counselling about her/his legal rights.
- Track and analyze incidents for trending and prevention initiatives.
- Immediately report a death or critical injury to an MOL inspector, the police (as required), JHSC/R, H&S representative and trade union, and investigate with JHSC/R. Report the circumstance to all parties in writing within 48 hours. Include information and particulars prescribed by the regulations.
- Issue a report to the employer and WSIB on all lost-time accidents where a worker requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days. Copies of accident information where there is no critical injury must be provided to the JHSC/R and the trade union within four days of the occurrence, as prescribed by the OHSA.
- Ensure the workplace violence and harassment prevention program is reviewed at least once a year.

#### Employees:

- Participate in education and training programs so you can respond suitably to any incident of workplace violence or harassment.
- Understand and comply with the violence and harassment prevention policies and related procedures.
- Report all incidents or injuries of violence/harassment or threats of violence/harassment to your supervisor immediately. Complete the Workplace Violence Incident Report.
- Inform the JHSC/R or the worker member of the JHSC/R about your concerns regarding the potential for violence/harassment in the workplace.
- Contribute to risk assessments.
- Seek support when confronted with violence/harassment or threats of violence.

- Get medical attention if needed.
- At least once a year, participate in a review of the workplace violence and harassment prevention program.

Joint Health and Safety Committee (JHSC/R):

- Ensure you are consulted about the development, establishment and implementation of violence prevention measures and procedures (the violence and harassment prevention program).
- Make recommendations to the employer for developing, establishing and providing training in violence prevention measures and procedures.
- At least once a year, take part in a review of the workplace violence and harassment prevention program.
- The worker-designate should investigate all critical violence-related injuries.
- Immediately review reports of critical injury or death. Outline in writing the circumstances and particulars within 48 hours of the occurrence.
- Within four days, review written notices of lesser injuries where any person is disabled from performing his or her usual work or requires medical attention.

## 03. Employment Policies and Guidelines

### Work Schedule/Hours of Work Policy

#### PURPOSE:

The purpose of this Policy is to establish guidelines for work schedules and hours of work to ensure consistency, fairness, and compliance with the [Employment Standards Act, 2000](#) (“ESA”) and organizational requirements.

#### SCOPE:

This Policy applies to all GDBIA employees.

#### DEFINITIONS:

**Hours Free From Work:** Periods of time during which an employee is not scheduled or required to perform job duties and is entitled to rest, relaxation and personal activities. These hours include breaks, eating periods, and time off between workdays. Hours free from work are important for promoting employee well-being and work-life balance.

**Hours of Work:** Specific time during which an employee is scheduled or required to perform job duties as part of their employment. These hours include regular work hours, overtime hours, and other periods designated by the employer as part of the employee’s work schedule.

#### BACKGROUND:

The ESA sets out minimum requirements for hours of work, breaks, overtime and other related matters, with exemptions for certain employees.

#### *Work Schedule / Hours of Work Policy Guidelines:*

The work schedule and hours of work expectations are as follows:

1. Full-time work at GDBIA consists of forty (40) hours per week (excludes eating periods).
2. Evening and weekend work may be required.
3. Where evening and weekend work occurs, off-setting time in lieu will be reviewed and confirmed with the Supervisor, provided that a lieu-time agreement with the employee is in place.

Exceptions to working hours require the manager’s approval. Hours worked in excess of forty (40) hours per week must be approved in advance by a manager. Regular working hours, in excess of hours of the daily and statutory limits, may be permitted subject to a written agreement between the Company and an employee. Casual working hours will vary. Hours worked will not exceed eight (8) hours per day or forty (40) hours per week.

#### Overtime

Overtime work is time worked in excess of forty-four (44) hours per week. Overtime work must be authorized in advance by the respective supervisor.

**Non-Management Category:** Overtime worked is paid at the rate of one and one-half (1 ½) times the employee's base hourly rate, or its equivalent, for all time worked in excess of forty-four (44) hours per week. Hours worked up to forty-four hours per week will be paid at the employee's base hourly rate.

**Management Category:** Pursuant to the ESA, certain employees in a Managerial or Supervisory role are exempt from the overtime provisions of the ESA. Notwithstanding this exemption, the Organization recognizes that it could reasonably be expected that in the course of performing one's duties extra hours may be worked from time to time. These are not eligible for overtime pay, but the incumbent may request Lieu time in connection with excess hours worked.

### **Eating Period**

Employees scheduled to work a shift which exceeds five (5) hours are required to take a thirty (30) minute unpaid eating period and work breaks in accordance with the ESA. Eating periods shall commence at a time that is no longer than five (5) hours after the shift starting time. Eating periods are not considered hours of work and are not counted towards hours worked or overtime.

### **Falsification of Work Hours**

Falsification of work hours or unauthorized adjustments to time records are prohibited and may result in disciplinary action.

### **Enforcement**

This Policy will be enforced consistently and fairly for all employees, with decisions regarding work schedules and hours of work based on operational needs, employee preferences, and compliance with applicable employment laws and organizational policies.

## **RESPONSIBILITIES:**

### **Employees:**

- Adhere to their assigned work schedule and promptly report any scheduling conflicts or concerns to their supervisor or department head.
- Communicate openly and proactively with their supervisor or department head regarding scheduling preferences, availability, and any challenges related to work hours or schedule changes.

### **Management/Supervisors:**

- Manage employee schedules, including assigning work hours, approving time off requests, and addressing scheduling conflicts.
- Communicate any changes to employee schedules or work hours in a timely manner and provide employees with necessary guidance and support
- Ensure that employee schedules comply with applicable employment laws, organizational policies, and operational requirements.

## Remote Work Policy

### PURPOSE:

The purpose of this Policy is to establish guidelines for employees engaging in remote work arrangements outside of GDBIA offices. This Policy delineates responsibilities and obligations of employees to ensure that remote work is conducted in a manner that upholds organizational standards, maintains productivity, and complies with all relevant legal and contractual requirements. By setting forth these guidelines, GDBIA aims to provide a clear framework for remote work that safeguards the interests of the Company while supporting employee flexibility.

### SCOPE:

This Policy is applicable to all GDBIA employees, temporary and seasonal staff, authorized by GDBIA to work remotely on a hybrid or fully remote basis.

### DEFINITIONS:

**Remote Work:** A work arrangement that allows employees to perform their job duties from a location outside the Company's primary office.

**Hybrid Work:** A work arrangement that allows employees to work both remotely and in the office on a regular schedule.

**Regular Working Hours:** Specific hours during which remote workers are expected to be available for meetings, collaboration, and communication with colleagues will be communicated to employees on case to case basis.

### BACKGROUND:

Remote work arrangements have become increasingly prevalent, necessitating clear and consistent guidelines to ensure that such arrangements align with legal standards and organizational objectives. This Policy is designed to provide a structured framework for remote work that complies with the [Employment Standards Act, 2000](#) ("ESA"). Remote work does not alter or override the contractual obligations and expectations established between GDBIA and its employees.

### *Remote Work Policy Guidelines:*

GDBIA is committed to supporting remote work arrangements where appropriate, in accordance with applicable laws and organizational objectives. This Policy is established to ensure that remote work opportunities are provided in a manner that upholds the Company's objectives and operations while promoting work-life balance for employees.

To this end, GDBIA will provide clear and enforceable guidelines regarding the acceptable use of computer devices, remote working opportunities, expectations, and workplace safety remote work expectations. Employees authorized to work remotely must adhere to these guidelines to ensure the protection of company assets, maintain productivity, and to comply with workplace safety standards and contractual obligations. The Company will periodically review all remote work arrangements to confirm they continue to meet organizational needs. Any violation of

these guidelines may result in disciplinary action, up to and including termination of employment.

Please be advised that GDBIA retains the authority and discretion to suspend and/or make modifications to remote work arrangements and require employees to transition back to the conventional office setting if deemed necessary and appropriate, respecting any accommodations that may be in place and complying with the ESA.

### ***Eligibility Requirements***

This remote work Policy applies to GDBIA employees who meet the eligibility criteria outlined herein and may be subject to modification at the Company's discretion, subject to compliance with the ESA. Employees are required to adhere to this Policy whenever they are authorized to work remotely, whether by direct approval or as stipulated in their employment contract.

Not all positions within GDBIA are suitable for remote work. Employees, in consultation with their managers, must evaluate the nature, duties, and responsibilities of their roles, as well as their personal circumstances, to determine whether a remote working arrangement is appropriate under the eligibility criteria set forth in this Policy. Remote work eligibility is contingent upon managerial assessment and approval, confirming that the employee's duties can be effectively performed in a remote setting.

Any remote work arrangement must receive formal approval from the employee's supervisor or manager. To request approval for remote work, eligible employees must engage in direct consultation with their supervisor or manager to reach a mutually acceptable arrangement.

To be eligible for a remote work arrangement, the employee must:

- Have reliable Internet access.
- Job duties which are suitable for remote work.
- Be capable and competent to perform job duties, operate with minimal supervision, and possess strong time-management and organization skills.

### **Work Expectations and Schedule for Remote Employees**

Employees and their supervisors/managers are afforded the discretion to design remote work arrangements that are specifically tailored to meet both the employee's individual circumstances and the Company's operational needs, provided that the following requirements are strictly adhered to:

- Employees must be able to perform the same duties, assignments and other tasks when working remotely as they do when working at GDBIA's physical office space.;
- Employees must be available to collaborate with other employees during regular working hours; and,
- GDBIA will determine employee-specific aspects of this policy with input from the employee, such as: the number of remote days, the employee's work schedule and the method of communication.
- The employee should be available by the agreed upon method within a reasonable time period during the agreed upon work schedule.

## **RESPONSIBILITIES:**

Employer:

### **Equipment and Supplies**

GDBIA may provide remote employees with specific equipment and supplies to create a safe and efficient workspace to complete their work. The equipment provided by GDBIA must be returned to the company upon the completion of the employee's contract. Any equipment provided such as laptops, headsets, cell phones, paper, and printers that are essential to the employee's job duties are to be used for business purposes only. Any misuse of company equipment may result in disciplinary action, up to and including termination of employment.

### **Workplace Safety**

The Company will work with employees to identify potential hazards associated with home-based work assignments and attempt to mitigate these risks. In the event of a work-related illness or injury occurring in a remote workplace, the employee is required to follow standard incident reporting procedures to report any unsafe or hazardous conditions in their at home work environment.

### **Technical Support**

GDBIA provides information technology (IT) support for employees during company business hours Monday to Fridays 9am – 5pm EST. Remote employees experiencing technical difficulties should submit a ticket to GDBIA's IT Department/Provider.

### **Compensation**

No changes will be made to an employee's base compensation if they work remotely, regardless of their location. Remote employees will be eligible for merit raises and promotions based on company policy and performance reviews.

Employee:

### **Workspace Safety**

Remote employees are expected to ensure a safe and healthy workplace in the home office environment. To ensure employee health and safety, it is essential that GDBIA remote employees conduct checks of their home office to ensure they are working in safe environment.

### **Security and Confidentiality**

Remote employees are expected to take proper measures to ensure the protection of company data, proprietary information, and assets. Employees must keep all private accounts password protected and keep all confidential information secured. Employees must not discuss or share any sensitive company information with individuals who are not in direct relation with the information and those not employed with GDBIA. Please refer to the Confidentiality Policy for further information on this matter.

### **Travel Requirements**

Remote employees will be required to attend meetings, events and programs in person as required by their supervisor.

**Consequences of Failing to Adhere to Remote Work Policies**

Failure to meet work requirements or comply with company policies and procedures while working remotely may result in the termination of the remote work agreement, the implementation of a performance improvement plan, discipline up to and including termination of employment, or any other disciplinary action the Company deems appropriate, subject to compliance with the ESA.

Employees who violate any of the rules in this Remote Work Policy or fail to meet productivity standards may be subject to disciplinary actions by supervisors, managers and the Executive Director.

## 04. Benefits

### Bereavement Leave Policy

#### PURPOSE:

The purpose of this Policy is to provide support and flexibility to employees who experience the loss of a loved one by granting bereavement leave to attend to funeral arrangements, grieve, and take care of personal matters during a difficult time. This Policy outlines the procedures and entitlements related to bereavement leave.

#### SCOPE:

This Policy is applicable to all GDBIA employees, temporary and seasonal staff who have been with GDBIA for at least two weeks, in accordance with the [Ontario Employment Standards Act, 2000](#) ("ESA").

#### DEFINITIONS:

**Bereavement Leave:** Time off granted to employees without pay following the death of an immediate family member to attend funeral arrangements, grieve, and take care of personal matters.

#### BACKGROUND:

The ESA sets out minimum entitlement for employees in Ontario, including provisions related to bereavement leave. GDBIA will comply with the requirements of the ESA, including providing eligible employees their right to bereavement leave without fear of reprisal.

#### *Bereavement Leave Policy Guidelines:*

GDBIA understands that employees require time off work to attend funeral services, grieve in private, and deal with family issues in the event of a death of an immediate family member. It is our intention to ensure that our employees are provided adequate time to properly take care of their family obligations, while maintaining their employment with GDBIA.

#### **Bereavement Leave Entitlement**

GDBIA employees who have been with the Company for at least two weeks will receive five (5) paid bereavement days per calendar year, which are to be used for grieving the death of a family member and attending a funeral or similar arrangements.

Bereavement leave can be taken at the time of the family member's death, or sometime later to attend a funeral or memorial service. It could also be taken to attend to estate matters. This leave provision integrates any and all bereavement leave entitlement prescribed in the ESA.

GDBIA reserves the right to inquire as to the name of the deceased and their relationship with the employee and may request documentation to accompany the leave (for example, a copy of the obituary or the name of the funeral home responsible for handling the arrangements).

Immediate family members will be pursuant to the ESA and consists of:

- The employee's spouse (includes both married and common-law couples).
- A parent, step-parent, or foster parent of the employee or the employee's spouse.
- A child, step-child, or foster child of the employee or the employee's spouse.
- A grandparent, step-grandparent, grandchild, or step-grandchild of the employee or of the employee's spouse.
- The spouse of a child of the employee.
- The employee's sibling or the sibling of the employee's spouse.
- A relative of the employee who is dependent on the employee for care or assistance.

In addition to immediate family members as defined by the ESA, this Policy shall also cover the loss of a child in utero or stillbirth and aunts/uncles.

Requests for bereavement leave where an employee does not qualify for leave under this Policy will be handled on a case-by-case basis and is subject to the discretion and judgment of GDBIA.

GDBIA will provide support and flexibility to employees returning to work following bereavement leave, including consideration of requests for additional time off, accommodations, flexible work arrangements, or support services as needed.

#### **Pet Bereavement Leave**

GDBIA employees who have been with the Company for at least two weeks will receive one (1) day of paid bereavement leave when they experience the loss of a family pet. This leave is provided to allow time for mourning and to handle any immediate needs related to the pet's passing.

#### **Confidentiality**

Information regarding the death of an employee's family member or loved one and the employee's bereavement leave is considered confidential and will be handled with sensitivity and respect for privacy.

#### **RESPONSIBILITIES:**

##### **Employees:**

- Responsible for promptly notifying their supervisor or manager of the need for bereavement need.
- Provide the name of the deceased, their relationship with the employee, and documentation to accompany the leave, if requested.
- Communicate with their supervisor or manager regarding their expected return to work date.
- Employees are expected to respect the privacy and confidentiality of their colleagues experiencing a loss and the sensitive nature of bereavement leave.

##### **Supervisor/Manager:**

- Provide compassionate support to employees who request bereavement leave and ensure appropriate arrangements are made to cover the employee's absence.
- Consider the employee's emotional needs during this difficult time and be flexible in accommodating requests.
- Handle information regarding an employee's bereavement leave with sensitivity and maintain confidentiality.

***Bereavement Leave Procedure:***

1. Employees who experience the loss of an immediate family member are responsible for promptly notifying their supervisor or manager of their need for bereavement leave. Employees should provide the name of the deceased and their relationship with the employee to their supervisor or manager.
2. Documentation or evidence considered reasonable in the circumstances for the bereavement leave request, such as a copy of the obituary or the name of the funeral home responsible for handling the arrangements, may be requested by GDBIA.
3. Eligible employees will be provided five (5) paid bereavement days per calendar year. Requests for a leave longer than two (2) days or requested bereavement leave where an employee does not qualify under this Policy will be handled on a case-by-case basis.
4. The Executive Director will process the leave.
5. The HR team will reach out to the employee on bereavement leave on the final day of their leave before the employee is due to return. They will check in that the employee is prepared to return and consider any requests for additional time off at this time.

## Public Holidays Policy

### PURPOSE:

The purpose of this policy is to establish clear guidelines for the recognition and observance of public holidays at GDBIA. This policy ensures that employees are informed of their entitlements and responsibilities regarding public holidays, in compliance with the [Employee Standards Act, 2000](#) ("ESA") and company standards. The policy aims to balance the company's operational needs with employees' rights to observe designated public holidays, promoting a respectful and equitable work environment.

### SCOPE:

This Policy is applicable to all GDBIA employees, temporary and seasonal staff.

### DEFINITIONS:

**Public Holiday:** A day designated by Ontario provincial authorities as a statutory holiday, observed with office closures and provisions for employee entitlements.

**The "Last and First Rule":** The terms "last regularly scheduled day of work before the public holiday" and "first regularly scheduled day of work after the public holiday" do not necessarily refer to the immediate days surrounding the holiday. To qualify for public holiday pay, an employee must work their entire last regularly scheduled shift before the holiday and their entire first regularly scheduled shift after the holiday or provide reasonable justification for any absences on these days.

### BACKGROUND:

This policy is governed by the public holiday provisions of the ESA.

#### ***Public Holidays Policy Guidelines:***

GDBIA recognizes public holidays designated by Ontario provincial authorities. Employees who qualify for public holiday pay will receive the following ten (10) public holidays off work with pay:

- New Year's Day.
- Family Day.
- Good Friday.
- Easter Monday.
- Victoria Day.
- Canada Day.
- Labour Day.
- Thanksgiving Day.
- Christmas Day; and
- December 26.

When a Holiday falls on a Saturday or Sunday and where an alternative day is not set out in law, GDBIA will designate the preceding Friday or following Monday as the Holiday.

### ***Eligibility***

To qualify for public holiday pay, an employee must follow the “last and first rule,” as defined above. If an employee has agreed to work on the public holiday and fails to report and work their scheduled shift, they will not be eligible for public holiday pay unless reasonable cause is provided.

An employee is deemed to have reasonable cause when circumstances beyond their control prevent them from attending work. It is the employee's responsibility to demonstrate that such reasonable cause existed for their absence.

### ***Holiday Pay Calculation***

Public holiday pay is calculated by adding the employee's regular wages and any vacation pay earned in the four work weeks prior to the week of the holiday, then dividing the total by 20. This ensures compliance with the ESA's guidelines for public holiday entitlements.

Regular wages do not include overtime pay, vacation pay, public holiday pay, premium pay, domestic or sexual violence leave pay, termination pay, severance pay, or termination of assignment pay. This calculation remains applicable even if the employee was not employed for the full four weeks preceding the public holiday.

### ***Working on a Public Holiday***

Due to operational requirements, there may be instances where it is advantageous for an employee to work on a public holiday. However, no employee at GDBIA will be required to work on a public holiday without their express consent. The employee must provide their agreement, either electronically or in writing, to work on the holiday, and will be compensated accordingly:

- Public holiday pay plus premium pay for all hours worked on the public holiday and not receive another day off (called a "substitute" holiday), OR
- Be paid their regular wages for all hours worked on the public holiday and receive another substitute holiday for which they must be paid public holiday pay.

### ***Holiday Pay Upon Termination***

Upon termination, GDBIA will provide employees with their earned public holiday pay.

### **RESPONSIBILITIES:**

**Management:** Schedule and manage employee attendance on public holidays. Communicate any changes or special arrangements regarding public holiday observance to their respective team in a timely manner.

**Human Resources/Executive Director:** Administer and communicate the organization's Public Holidays Policy to employees. Ensure compliance with applicable legislation, including the ESA, regarding public holiday entitlements.

## Sick Leave Policy

### PURPOSE:

This Sick Leave Policy is established to provide employees with time off to address their health needs, ensuring their well-being and maintaining workplace safety. The Policy outlines the conditions under which sick leave may be taken, in compliance with the [Employment Standards Act, 2000](#) (“ESA”). This Policy concerns rights and obligations regarding sick leave, including the entitlement to unpaid sick leave as mandated by the ESA, and the procedures for requesting and documenting such leave.

### SCOPE:

This Policy applies to all full-time and part-time employees.

### DEFINITIONS:

Sick leave: **An absence from work due to personal illness or injury.**

### BACKGROUND:

This Sick Leave Policy is designed to support employees by providing time off for illness or medical conditions, ensuring they can recover without affecting their employment. This Policy is intended to adhere to the ESA, and the [Ontario Human Rights Code](#) (“HRC”). It reflects our commitment to supporting employee health and well-being while maintaining compliance with legal standards.

### *Sick Leave Policy Guidelines:*

GDBIA employees who have been with the Company for at least two weeks will receive three (3) unpaid sick days per calendar year regardless of full-time or part-time status, in accordance with the ESA. This leave is unpaid, and any days not used will not carry over to the following year. There is no pro-rating of the three-day entitlement; an employee who begins work partway through a calendar year is still entitled to three (3) days of leave for the rest of that year. If an employee takes a portion of a day as a day under sick leave, GDBIA will consider the employee to have taken one full day of that leave, in accordance with the ESA.

Employees who have been employed for a minimum of two consecutive weeks may take sick leave under the following circumstances:

- An employee suffers a personal illness or injury; or
- An employee must attend to a personal medical emergency.
- An employee has a scheduled medical appointment or treatment.
- Eligibility for and use of sick leave shall have no effect on the employee’s entitlement to any other protected leave under the ESA.

It does not matter whether the illness, injury or medical emergency was caused by the employee or by external factors beyond their control.

### ***Call-In Procedure***

- Employees must notify their supervisor of their intention to use sick leave.
- Notification of the intention to take sick leave must be provided as soon as is reasonably possible, but not less than 30 minutes before the start of the employee's scheduled shift.
- If it is not feasible for the employee to notify the employer before starting the leave, the employee must inform the employer as soon as possible after starting it. The notice does not have to be in writing, oral notice is sufficient.
- In cases of foreseeable absences, such as scheduled medical appointments, advance notice should be provided to the extent possible.

### **Documentation**

GDBIA may require that an employee who takes sick leave provide evidence that is reasonable under the circumstances substantiating their entitlement to the leave, in accordance with the ESA. Unless prohibited by the ESA, including a medical note or a Functional Abilities Form may be required.

GDBIA may only ask for the following information:

- The duration or expected duration of the absence;
- The date the employee was seen by a health care professional;
- Whether or not the patient was examined in person by the health care professional issuing the note.

GDBIA will not ask for information about the diagnosis or treatment of the employee's medical condition.

Abuse of the sick leave benefit may result in disciplinary action up to and including termination of employment.

### **Confidentiality**

Information regarding an employee's illness or medical condition will be treated with confidentiality and will only be disclosed to individuals with a legitimate need to know, in accordance with applicable laws and regulations.

### **Distinction from Other Leave Categories**

The use of sick leave is separate from other types of leave, including but not limited to bereavement leave, parental leave, pregnancy leave, domestic or sexual violence leave, and may be taken separately even for the same event.

### **RESPONSIBILITIES:**

Employees:

- Make every effort to work safely by abiding by health and safety policies and procedures and by practicing accident prevention.

- Notify their immediate Supervisor as soon as possible in the event that they will be late or absent from work.
- Seek assistance or guidance from their Supervisor or Human Resources/Executive Director related to any kind of absence as appropriate.

#### Management:

- Inform and support employee awareness of sick leave provisions and responsibilities as outlined in this policy and other policies related
- Communicate regularly with employees who are on sick leave, monitoring their progress and requesting medical evidence from the employee as appropriate unless prohibited by the ESA.
- Ensure that employee absences are accurately reported on a bi-weekly basis and submitted to Finance/the Executive Director for processing.
- Forward all medical documentation and communication documents to Human Resources/Executive Director to be kept in the employee's confidential file.
- Notify Human Resources/Executive Director of absences greater than three (3) days.

#### Human Resources/Executive Director

- Provide policy clarification and guidance on sick leave and related policies and programs to employees and departments, as required.
- Maintain employee records related to sick leave documentation in a confidential manner.
- Support compliance with provincial legislation such as the ESA and HRC as amended from time to time and as applicable.

#### ***Sick Leave Procedure:***

1. Employees absent through illness or injury will notify or send notification to their respective Supervisor promptly when they have taken ill or are injured, and will keep their Supervisor regularly informed of their recovery progress for the duration of their absence.
2. If requested, employees will provide a medical note or complete a Functional Abilities Form (FAF).
3. Managers are responsible for day-to-day management and monitoring of sick leave credits and attendance.
4. Employees are required to cooperate with return-to-work programs.

## Vacation Policy

### PURPOSE:

The purpose of this Vacation Policy is to outline the guidelines and procedures regarding vacation entitlement, scheduling, and administration for all applicable employees of GDBIA.

### SCOPE:

This Policy applies to all full and part-time employees. In the event of any conflict between the provisions of this Vacation Policy and applicable legislation, the requirements of the law will prevail.

### *Vacation Policy Guidelines:*

GDBIA's vacation year runs from January 1st to December 31st. Employees are required to take their full vacation entitlement within the vacation year. Vacation entitlement above the minimum requirements under the Employment Standards Act (ESA) may be carried over up to sixty days with written approval from management.

Regular full-time employees can submit an unpaid vacation request if they have not accumulated enough paid vacation days. These requests will be considered by the GDBIA Management Team on a case-by-case basis.

Regular part-time and fixed-term contract employees will receive payment of vacation pay on all regular and overtime earnings with each regular pay. Vacation pay entitlements will be outlined in the Employment Agreement for all regular part-time and fixed term contract employees. Upon termination of employment, employees will be entitled to receive payment for any accrued vacation pay in accordance with the ESA.

### RESPONSIBILITIES:

#### Employees:

- Responsible for familiarizing themselves with this Policy and adhering to its provisions.
- Employees must communicate their vacation plans to their Supervisor in advance and obtain approval for their chosen vacation time.
- Employees are required to utilize their full vacation entitlement by the end of the vacation year and are responsible for scheduling their vacation time accordingly.
- Employees must accurately record their vacation time usage.

#### Management:

- Responsible for ensuring that employees are aware of their vacation entitlement and the procedures for requesting and scheduling vacation time.
- Supervisors must review and approve employees' vacation requests in a timely manner, taking into consideration operational needs and staffing requirements.
- Supervisors should encourage employees to take regular vacation time to promote work-life balance and employee well-being.

- Supervisors are responsible for maintaining accurate records of employees' vacation time usage and ensuring that any discrepancies or issues are promptly addressed.

Finance/Executive Director/Bookkeeper:

- Ensure that employees receive their entitled vacation pay in accordance with company Policy and applicable legislation.

***Vacation Scheduling Procedure:***

1. An employee will submit, in writing, their intention to take vacation time. The vacation request should include the dates of the requested vacation, the total number of vacation days requested, and any relevant notes or special considerations. Unless otherwise authorized, employees must submit their vacation requests with as much advance notice as possible, but at a minimum of two (2) weeks before the intended vacation dates.
2. Supervisors will review vacation requests in a timely manner, taking into consideration operational needs, staffing requirements, and any previously approved vacation requests from other employees. Supervisors may consult with other relevant departments or team members to assess the impact of the requested vacation on ongoing projects or departmental activities.
3. Supervisors will communicate the approval or denial of the vacation request to the employee in writing.
4. In the event that a vacation request cannot be accommodated due to operational reasons or staffing constraints, Supervisors will work with the employee to identify alternative dates or solutions whenever possible.
5. Supervisors will notify the Executive Director of the paid or unpaid vacation time to be taken.
6. For all regular full-time employees, the Executive Director will carry out vacation pay when the vacation is taken and deposit it into the employee's bank account through the normal company pay process.



## Grimsby Downtown BIA Rules for the Use of Municipal Resources During an Election Period Elections Policy 001

### **1. Purpose & Background**

The *Municipal Elections Act, 1996*, as amended, ("the Act") requires municipalities and local boards to establish rules and procedures for the use of municipal and board resources during the election campaign period. The Act also states that the GDBIA, as a local board, cannot make a contribution (including money, goods, and services) to any candidate or registered third-party advertiser during an election.

Any use of GDBIA resources by or on behalf of candidates, registered third-party advertisers, their representatives, or staff for election campaign purposes would be considered a contribution by the GDBIA. Since campaign contributions can take the form of money, goods, or services, any use of GDBIA resources for election campaign purposes is not permitted.

This policy does not prevent a Member of the Board from seeking election; however, any Board Member running for public office must take a formal leave of absence from the GDBIA Board for the duration of the election campaign period. The leave of absence must be submitted in writing to the Board Chair and Executive Director and formally acknowledged at the next scheduled BIA Board meeting. During the absence, the member shall not attend meetings, vote, or represent the GDBIA in any capacity. As noted in EP002, any individual elected to public office while serving on the GDBIA Board or a committee must immediately resign from their GDBIA position upon assuming their public role. If not elected to public office, the Board Member may resume their position for the remainder of the current four-year term, provided their seat has not been filled through the regular BIA election process, which coincides with the term of municipal council under Section 204(10) of the Municipal Act, 2001.

As a local board, the GDBIA is required to establish its own rules and procedures for the use of board resources during the election campaign period. Candidates, registered third-party advertisers, and political parties must adhere to these policies when using resources, assets, facilities, or attending events.

The GDBIA Board and its working groups and subcommittees are subject to this policy.

The Town Clerk has the authority to interpret and make amendments to this policy as required for implementation. The Clerk's decisions on these matters shall be final.

Further details on election regulations are found in the *Municipal Elections Act, 1996* and from the Town of Grimsby's "Use of Corporate Resources During An Election Campaign" Policy.

### **Definitions**

Campaign material' includes materials in any media (print, displays, vehicle stickers, electronic, radio, television, websites, and social media) used to promote, support, or oppose a candidate or a question on the ballot.

'Campaigning' refers to any activity promoting or opposing a candidate, registered third-party advertiser, or ballot question during an election period.

'Election period' means the official campaign period of an election as defined by the *Municipal Act, 1996*

'Employee' means any individual working for or receiving compensation from the GDBIA, including part-time, seasonal, or contract workers.

### **2. Administration**

GDBIA resources, including its office, promotional platforms, assets, website and events, may not be used for campaigning.

### **4. Access to GDBIA Property During an Election Period**

- GDBIA-managed facilities, spaces, and sponsored events may not be used for any campaigning.
- Campaign material may not be displayed on or adjacent to GDBIA-managed property.
- Campaigning and campaign material are not permitted in or near voting locations on Voting Day or public property.

### **5. Use of GDBIA Technology and Digital Resources**

- GDBIA resources, such as office equipment, email accounts, and social media platforms, may not be used for campaigning.
- The GDBIA's website and social media accounts shall not include campaign material.
- The GDBIA's logo and branding may not be used in campaign materials.

### **6. Attending GDBIA Events During an Election Period**

- Candidates and political parties may attend GDBIA events as private citizens but may not campaign while attending.

- Elected Officials may participate in official capacities but must not use GBDIA events for campaigning.

## **7. GDBIA Employees**

Employees and volunteers must not engage in campaign activities during work/volunteer hours, campaign in their capacity as an employee/volunteer, or use GBDIA resources.

## **8. GDBIA Board Members and Committees**

- GDBIA Board and Committee resources may not be used for campaigning.
- Board members may engage in campaigning as private citizens, provided they do so separately from their official roles.

## **9. Enforcement & Amendments**

The GDBIA Board has the authority to interpret and enforce this policy. The Town Clerk may update it as needed to ensure compliance with municipal, provincial, or federal election laws.

## **10. Statutory Provisions / Other Relevant Policies**

This policy operates along with and as a supplement to existing legislation and Town policies governing the use of municipal resources during an election campaign period:

- the Municipal Elections Act, 1996, as amended
- the Finance Election Act, 1990, as amended
- the Canada Elections Act, 2000, as amended
- the Town of Grimsby Procedural By-law
- the Town of Grimsby Use of Corporate Resources During an Election Campaign Policy
- EP002 - Political Endorsements & Participation in the Electoral Process

This policy is intended to be read in conjunction with its counterpart (EP002 - Political Endorsements & Participation in the Electoral Process), which addresses complementary elements of election-related conduct.

<b>Revision #</b>	<b>Description of Date Changes Created</b>	<b>Date Revised</b>	<b>Reviewed By:</b>	<b>Approved By:</b>
<b>001</b>	Creation of Document	N/A	Executive Team	Pending
<b>002</b>	Approval of Board	N/A	Board of Management	Pending



## Grimsby Downtown BIA Political Endorsements & Participation in the Electoral Process Elections Policy 002

### **1. Purpose**

The Grimsby Downtown Improvement Area (GDBIA) is committed to fostering a democratic and informed community while maintaining a strictly non-partisan stance. The GDBIA Board of Directors recognizes the importance of public awareness and education on matters relevant to the downtown business district and its members. As a non-partisan organization, the GDBIA will conduct its activities with integrity, transparency, and fairness while ensuring it does not endorse or support any political party or candidate.

As a local board under the Municipal Act, 2001, the GDBIA is required to remain non-partisan and impartial in matters related to political campaigns, endorsements, and election participation. This policy aligns with the legislative framework governing BIAs in Ontario. The GDBIA Board of Directors, staff, and committees will adhere to the following principles to avoid perceived or actual conflicts of interest. The Board Chair is responsible for ensuring that the Executive Director and staff follow this policy in all GDBIA activities. This policy applies to all elections except for the BIA election process itself, which is governed separately under municipal and provincial regulations.

### **2. Political Participation**

#### **Holding Elected Office**

- A Board Member, officer, or committee member may not simultaneously hold a publicly elected office at the municipal, regional, provincial, or federal level while serving on the GDBIA Board or any GDBIA Committee, except for City Councillors appointed to the Board as per municipal regulations.
- Any individual elected to public office while serving on the GDBIA Board or a committee must immediately resign from their GDBIA position upon assuming their public role.

### **3. Political Endorsements: Restrictions on Endorsements**

- i. The GDBIA Board, Committees, staff, or representatives may not publicly endorse, promote, or support any political party or candidate for elected office.
- ii. The GDBIA's name, resources, or branding shall not be used in any way to support, promote, or fundraise for any political candidate, campaign, or party.
- iii. As a publicly funded organization, the GDBIA is prohibited from using any financial resources, staff time, or assets for political purposes, including supporting, opposing, or promoting candidates or political parties. See EP Policy 0001 for use of GDBIA during election periods.

### **4. Participation in Political Campaigns: High-Profile Campaign Roles**

- i. Any Board Member, officer, or committee member who assumes a high-profile public role in an election campaign must take a leave of absence from the Board or committee before engaging in any campaign activities.
- ii. A high-profile role includes, but is not limited to, serving as a campaign manager, official spokesperson, or key fundraiser for a candidate or party.
- iii. The leave of absence remains in effect until the campaign period concludes.

### **5. Separation from GDBIA Operations During a Campaign**

- i. Any individual involved in a campaign must not engage with GDBIA staff or activities in a way that could imply GDBIA's support for a candidate or party.
- ii. Communication between campaign-affiliated individuals and GDBIA staff should be strictly limited to operational matters, such as all-candidates forums.
- iii. The candidate or campaign participant will be encouraged to inform the public of their leave of absence from the GDBIA.

### **6. Public Communication of Leave of Absence: Transparency & Public Notification**

- i. The GDBIA Board may issue a public statement informing members, stakeholders, and the media of any Board Member's leave of absence due to campaign participation.
- ii. The GDBIA Board will ensure fair and equal treatment of all candidates, including hosting unbiased election events, debates, or forums to provide information to business members and the public.
- iii. If the GDBIA organizes an election forum or debate, all registered candidates must be invited and provided with equal opportunities to present their platforms.

**7. Business Member Participation vs. Board Participation:** Clarification on Business Owners' Political Involvement

- i. Individual BIA members (business owners, property owners) are free to engage in political activities in their personal capacity.
- ii. However, business owners must not imply or represent their views as those of the GDBIA.
- iii. No business within the BIA district may suggest or advertise that the GDBIA endorses a political candidate or party.

**8. Enforcement & Amendments:** Policy Compliance & Review

- i. The GDBIA Board of Directors is responsible for enforcing this policy and ensuring compliance.
- ii. Any violations of this policy may result in disciplinary action, including removal from the Board or committee.
- iii. The Board may revise this policy as needed to align with legislative changes and best practices for non-partisan organizations.

**9. Statutory Provisions / Other Relevant Policies**

This policy operates along with and as a supplement to existing legislation and Town policies governing the use of municipal resources during an election campaign period:

- the Municipal Elections Act, 1996, as amended
- the Finance Election Act, 1990, as amended
- the Canada Elections Act, 2000, as amended
- the Town of Grimsby Procedural By-law
- the Town of Grimsby Use of Corporate Resources During an Election Campaign Policy
- EP001 - Rules for the Use of Municipal Resources During an Election Period

This policy is intended to be read in conjunction with its counterpart (EP001 - Rules for the Use of Municipal Resources During an Election Period), which addresses complementary elements of election-related conduct.

Revision #	Description of Date Changes Created	Date Revised	Reviewed By:	Approved By:
001	Creation of Document	N/A	Executive Team	Pending
002	Approval of Board	N/A	Board of Management	Pending

## **Road Construction Business Support Task Force (RCBSTF)**

### **1. Purpose:**

The Road Construction Business Support Task Force (RCBSTF) is to be established to develop and implement strategies that minimize the negative impact of road construction on downtown businesses. The task force will collaborate with local stakeholders to allocate reserve funds, create initiatives, and provide direct business support through marketing, events, community engagement, and advocacy.

### **2. Objectives:**

- **Financial Allocation:** Recommend effective use of reserve funds to support businesses directly impacted by road construction.
- **Business Impact Assessment:** Monitor and assess the economic impact of construction on businesses to adjust strategies accordingly.
- **Marketing and Events:** Develop marketing strategies and host events to drive foot traffic and foster community engagement.
- **Business Advocacy:** Gather and compile business concerns related to road construction and provide updates to the BIA, which will communicate with the Town of Grimsby to advocate for municipal support and ensure clear construction progress updates.
- **Community Engagement:** Encourage local residents to support downtown businesses through targeted campaigns and initiatives.
- **Digital Strategy:** Enhance the online presence of downtown businesses through training, marketing campaigns, and social media initiatives.

### **3. Scope of Work**

- **In Scope:**
  - Developing business support initiatives and campaigns.
  - Recommending financial relief measures.
  - Organizing marketing and community engagement events.
  - Providing regular communication updates to affected businesses.
  - Advocating for municipal support and resources.
- **Out of Scope:**
  - Direct management of road construction projects.
  - Changes to construction timelines or budgets.

### **4. Composition:**

- **Number of Members:** Up to 15 members, minimum 8 voting members
- **Membership:**
  - Minimum of two BIA board members
  - One representative from the Chamber of Commerce
  - One Town of Grimsby staff member ( non-voting member)
  - Up to two additional community or business representatives with expertise in marketing, events, business development, or digital marketing.
- **Quorum:** simple majority must be achieved (50% of voting members)

- If a quorum is not achieved within fifteen (15) minutes after the time appointed for the commencement of the meeting, the recording secretary shall record the names of the Members present and the meeting shall not be called to order. All items on the agenda shall be included on the agenda for the next Regular Meeting or until any Special Meeting is called.
- **Term Length:** Members will serve for the duration of the road construction project or as determined by the BIA Board.
- **Appointment Process:** Members will be appointed by the BIA Board based on their expertise and interest in contributing to the task force.
- **Replacement:** In the event a member resigns or is unable to fulfill their duties, the BIA Board will appoint a replacement.
  - If a member misses three consecutive meetings without reasonable justification, the Chair and Vice Chair will review their participation and may recommend a replacement to the BIA.
- **Absences:** Members who are unable to attend a meeting must notify the Chair or Secretary at least 24 hours in advance, where possible. A reasonable justification should be provided for absences.

## 5. Roles and Responsibilities:

- Chair: The task force will select a chair to facilitate meetings and ensure progress is tracked and reported.
- Task Force Members: Each member will be responsible for specific areas of focus (events, marketing, financial planning, advocacy, digital strategy).
- BIA Executive Director (Amanda): This person provides administrative support, acts as the primary point of contact, and reports progress to the BIA Board.
- Staff Advisors: Town staff may attend meetings to provide project updates and recommendations.

## 6. Decision-Making Authority:

The task force will not have the authority to spend money independently. Its primary role is to generate ideas and recommend initiatives to the BIA Board for consideration. There is a dedicated budget line allocated for the task force to support ideas brought forward. If the board approves an idea, the task force will be responsible for managing its execution within the approved budget and providing monthly updates to the board.

## 7. Reporting Structure

The task force will provide monthly progress reports to the BIA Board, summarizing activities, initiatives, and outcomes. Additional reports may be requested as needed.

## 8. Timeline:

The task force will remain active throughout the road construction project, with the option to disband upon completion of its objectives or as determined by the BIA Board.

**9. Meetings:**

- Frequency: Monthly meetings or as needed to maintain momentum.
- Format: Meetings will be held virtually, depending on member availability.



**From: BIA Staff**

**To:** Board of Management, Grimsby District Improvement Area

**Date:** April 16, 2025

**Subject:** *Proposal for Canada Flag Project*



**Downtown Port Hope Flag Project**

### **Proposal Overview**

We propose the procurement and installation of a minimum of 30 Canadian flags to be proudly displayed on businesses throughout the downtown. In partnership with the Beamsville Business Improvement Area (BIA), this collaborative initiative is designed to enhance the visual identity of both downtown cores while fostering a shared sense of community between Grimsby and Beamsville. Displaying the Canadian flag not only cultivates national pride but also reinforces the importance of supporting Canadian-made products and local businesses.

To ensure maximum impact, the flag installations will be timed to coincide with the red and white floral displays already secured for downtown planters, creating a cohesive and vibrant streetscape. In addition to its symbolic value, this show of unity is expected to increase foot traffic, encouraging residents and visitors alike to explore, shop, and support our local businesses. Local business sponsorship will be a key component of the project, helping to offset costs while reflecting a collective investment in the vitality and identity of our downtowns.

### **Timeline:**

- **Sponsorships Secured:** Sponsorship outreach and confirmation will be completed by late April (see below for Canadian Tire details), ensuring sufficient funding and community involvement for both the flag and planter components of the project.
- **Planter Installation:** The planters have already been installed. Red and white floral baskets installation timeline will be weather dependent. The hope is to implement them in downtown Grimsby and Beamsville by early May.
- **Flag Installation & Takedown:** Canadian flags will be installed between the May long weekend and July 1, and will remain in place until after Remembrance Day. When taken down for Winter, Pole will be taken down, but bracket will remain on building. The flags will be reinstalled each May. An annual cost of \$700-750 will be required for install and \$200 to replace ripped flags.
- **Display Duration:** Flags and coordinated planters will remain in place throughout the spring, summer, and fall, reinforcing national pride during key celebrations such as Canada Day and Labour Day.

### Budget Overview:

Please note that the following budget totals reflect the full cost of the initiative and do not account for anticipated sponsorship contributions or the partnership with the Beamsville BIA. The Beamsville BIA will be inviting their member businesses to contribute by covering the portion of the flag kit cost (bracket, pole, and flag) not supported by sponsorship, while the BIA itself will fund the remaining installation expenses. In contrast, we are proposing that our BIA fully cover both the cost of the remaining flag kits and all associated installation fees to ensure success of program and buy-in for the first year.

Pre-Sponsorship Price			
Cost Item	Quantity	Cost Per Item Excluding Tax	Total (Quantity x Cost Per Item) Excluding Tax
Flags and Bracket Kit	30	\$99.00	\$2,938.00
Installation	30	\$85.00	\$2,550.00
<b>2025 Total Cost:</b> <i>(Before Removal)</i>			<b>\$5533.00</b>
Flag Takedown (Post Remembrance Day)	30	\$24.00	\$720.00
<b>2025 Total Cost:</b> <i>(After Removal)</i>			<b>\$6253.00</b>
Post- Sponsorship Price			
Cost Item	Quantity	Cost Per Item	Total

		Excluding Tax	(Quantity x Cost Per Item) Excluding Tax
Flags and Bracket Kit	30	72	\$2,160
Installation	30	85	\$2,550
<b>2025 Total Cost:</b> <i>(Before Removal)</i>			<b>\$4,710</b>
Flag Takedown (Post Remembrance Day)	30	24	\$720
<b>2025 Total Cost:</b> <i>(After Removal)</i>			<b>\$5,430</b>

The total projected cost for Grimsby's portion of the initiative is \$5,430 (excluding HST) for 30 flags. This includes the purchase of 30 kits (which stay affixed to the building – poles come down with flags each for \$72 each, totalling \$2,160. Installation services are quoted at \$85 per unit for 30 flags, amounting to \$2,550.00. Additionally, end-of-season flag removal has been quoted at \$24 per flag, for a total of \$720.00. The combined cost of these items brings the full project total to \$5,430.

Canadian Tire has generously offered to sponsor the project by reducing the cost of each flag kit from \$99 to \$72, significantly lowering the overall expense. In recognition of their support, Grimsby Canadian Tire (a Downtown BIA member) would be acknowledged across our communications channels, including social media, newsletters, a feature article on our website, and in the official press release. Additionally, representatives from Canadian Tire will be invited to participate in a small ceremony to mark the launch of the initiative. Due to tariffs and logistical considerations, purchasing through Canadian Tire will result in a June launch date, aligning with the expected arrival of the flags.

It is important to note that the vendor has assured us that the installation cost will not be impacted by additional flags contributed by the Beamsville BIA. Additionally, Beamsville will cover the cost of their own flags.

#### **Proposed Operational & Marketing Plan:**

Item	Qty.	Estimated Cost
Press Release	1	\$0
Social Media Coverage	Ongoing	\$0
Facebook Event for Installation Day	1	\$0
Facebook Event Boost	1	\$50
Meta Ad/Boosted Post	1	\$50

#### **Next Steps (if approved):**

If the project receives approval from the board, the following steps will be undertaken to ensure timely and successful implementation:

- **Secure Permissions:** Finalize MOU agreements with downtown property owners to grant permission for the installation of brackets and flags on their buildings.
- **Purchase Materials:** Place the order for flags, brackets, and any associated hardware required for installation.
- **Confirm Sponsorships:** Follow up with Canadian Tire and begin outreach to other potential sponsors as needed. Distribute sponsorship packages and confirm support.
- **Finalize Installation Schedule:** Work with installation company to confirm dates, with the goal of completing installation over the May 2-4 weekend.
- **Coordinate with Beamsville BIA:** Confirm flag quantities and finalize cost-sharing logistics for installation.
- **Prepare Marketing Materials:** Develop and schedule communications to share the initiative with the public, including press releases, social media posts, and recognition for sponsors.
- **Plan for Removal:** Schedule flag removal after Remembrance Day and ensure this step is reflected in the contract with the installer.
- **Monitor and Maintain:** Establish a plan for mid-season checks to ensure flags remain secure and in good condition.
- **Document and Report:** Capture photos and metrics for future reporting and to demonstrate impact for sponsors and stakeholders.

### **Recommendation**

We recommend that the Board approve the Downtown Canadian Flag Beautification Project and authorize a financial contribution toward our portion of the initiative.



**From: BIA Staff**

**To:** Board of Management, Grimsby District Improvement Area

**Date:** April 16, 2025

**Subject:** *Proposal for Shuttle Bus Service for the International Plowing Match*

### **Proposal Overview**

We propose securing a shuttle bus service in collaboration with the Beamsville BIA for the International Plowing Match taking place at the West Niagara Agricultural Centre & Fairgrounds from September 16–20. The shuttle will provide convenient transportation for both Grimsby and Beamsville residents, with centrally located pick-up and drop-off points in each downtown. By positioning the stops in the hearts of our communities, this initiative is expected to boost foot traffic and support local businesses during the event. Additionally, this joint effort will promote collaboration between our neighbouring communities and help strengthen municipal connections through shared participation in a major local event.

### **Background:**

The proposed shuttle service aims to transport visitors between Downtown Grimsby, Downtown Beamsville, and the International Plowing Match (IPM) site on a continuous loop throughout the event (scheduled for September 16–20).

This initiative presents a valuable opportunity to increase foot traffic, visibility for local businesses, and overall community participation. By making it easier for residents and visitors to access both downtown areas and the IPM site, the shuttle service is expected to create meaningful economic and social benefits for both communities.

Additionally, the Downtown Bench Beamsville BIA has expressed interest in partnering on this initiative and contributing to the cost, with specific financial details still to be determined. This collaboration reflects a shared commitment to regional cooperation and mutual support, while further enhancing the success of this event.

### **Proposed Route:**

The shuttle will operate on a continuous loop connecting Downtown Grimsby, Downtown Beamsville, and the IPM site. The loop will begin in Downtown Grimsby, serving as the first pick-up and drop-off location, before continuing to Downtown Beamsville as the second stop. From there, the shuttle will travel to the IPM site, allowing passengers to attend the event. After visiting the IPM, the shuttle will return to Downtown Grimsby to begin the loop again. This route is

designed to provide convenient access for residents and visitors from both communities, while also maximizing exposure and potential foot traffic for businesses in each downtown core.

### **Logistics:**

The shuttle will operate on a continuous loop, starting at 8:30 AM and running until 5:30 PM, with pick-ups scheduled approximately every 30 to 45 minutes from each stop. This frequency ensures a reliable and accessible service for event-goers throughout the day.

### **Estimated Travel Time Between Stops:**

Below is a breakdown of travel times and distances:

- **Grimsby to Beamsville:** Approximately 12 minutes (9.7 km), via Queen Elizabeth Way and Ontario Street/Regional Road 18.
- **Beamsville to IPM Site:** Approximately 12 minutes (11.8 km), via Thirty Road and Mud Street East/Regional Road 73.
- **IPM Site to Grimsby:** Approximately 7 minutes (5.9 km), via Mountain Rd/ Regional Rd 12.

### **Proposed Shuttle Stop Locations**

- **Downtown Grimsby:** Suggested locations include the parking lot behind Giant Tiger or the parking lot behind Mrs. Greenway's. Both locations offer central, accessible pick-up points near popular businesses and adequate space for shuttle access.
- **Downtown Beamsville:** The parking lot behind Conversations Café is currently being considered (to be confirmed). This location provides a central downtown access point, with proximity to local shops and amenities.

While estimated travel times between stops are approximately 12 minutes from Grimsby to Beamsville, 12 minutes from Beamsville to the the IPM site, and 7 minutes from the IPM site back to Grimsby, these figures are based on ideal driving conditions. Actual travel times may vary due to factors such as escarpment terrain, local traffic patterns, event-related congestion, and road conditions. Additionally, the shuttle service provider may determine that alternate routes are more efficient during peak times or in response to unforeseen delays. These considerations will be factored into the final schedule to ensure the service remains reliable and responsive to changing conditions.

### **Signage Coordination and Setup:**

Signage to indicate shuttle stops and general public awareness will be coordinated by the internal BIA staff. Our team will work directly with the Town of Grimsby and relevant municipal partners to ensure timely setup, visibility, and compliance with any necessary permits or regulations.

### **On-Site Oversight and Communication During Event Days**

Day-to-day operations of the shuttle service, including route monitoring, handling delays, or rerouting, will be managed by the transportation vendor. They are responsible for ensuring the schedule remains on track and will coordinate directly with our internal BIA team to communicate

any service interruptions or adjustments. The BIA team will then notify the public through the appropriate channels (e.g., social media).

### Contingency

### Plan

All potential transportation vendors have confirmed that a backup shuttle will be on standby in the event of a mechanical issue or service disruption. This ensures continuity of service and minimizes the risk of prolonged delays for passengers.

### Vendor Pricing Comparison:

Please see below:

Vendor	Pricing Per Day	Total Pricing (All days included)	Notes
Vendor 1	\$1,860	\$9,300	This quote reflects the pricing for 1 bus. They suggest having 3 buses operating at a time.
Vendor 2	\$1,125	\$5,625	24 passenger shuttle for \$1,125.00 +HST/Per day  Or a 44 Passenger Activity for \$1,225.00+HST /Per day.
Vendor 3	They are away, still waiting to hear back	They are away, still waiting to hear back	They are away, still waiting to hear back

Following the pricing table above, the key details from each vendor are summarized below for consideration:

Vendor 1 proposes operating three buses to maintain a 20-minute loop frequency between Downtown Grimsby, Downtown Beamsville, and the IPM site. At \$1,860 + HST per bus, per day, the total five-day cost is \$27,900 + HST. This option provides the highest frequency and capacity, ideal for managing larger crowds.

Vendor 2 offers two lower-cost alternatives. The 24-passenger shuttle is priced at \$1,125 + HST per day, totaling \$5,625 + HST for five days. The 44-passenger bus is \$1,225 + HST per day, totaling \$6,125 + HST. These options offer reduced frequency but may be sufficient depending on expected ridership.

Vendor 3-

The following organizations have provided us with quotes:

- Niagara Region Transit
- Ayr Coach
- Student Transportation of Canada

#### **Proposed Operational & Marketing Plan:**

<b>Item</b>	<b>Qty.</b>	<b>Estimated Cost</b>
A-Frame Signage at all Shuttle Stops	3	\$907
Printed Pamphlets	2500-5000	\$635-\$957
Branded Shuttle Decals	3 Buses, 2 decals each	\$500
Route and schedule posted on our website, shared via social media, and included in any IPM visitor newsletter.	--	\$0
Optional: branded handouts, tote bags, or coupons available on board to promote shopping downtown.	--	--

In addition to the shuttle service itself, several supporting materials and promotional items are proposed to enhance visibility, ensure clarity for riders, and encourage foot traffic to Downtown Grimsby. This includes A-frame signage at each shuttle stop (estimated at \$907 for three), printed pamphlets (ranging from \$635 to \$957 depending on quantity), and branded shuttle decals for each bus (\$500 total). The route and schedule will be posted on the BIA website, shared through social media, and included in any IPM visitor newsletter at no additional cost. As an added opportunity, the BIA may consider optional branded materials such as handouts, tote bags, or coupons to further promote local shopping during the event.

#### **Recommendation**

We recommend that the Board approve the IPM Shuttle Bus Service initiative, pending confirmation of the Beamsville BIA's financial contribution toward the overall cost. Once the partnership is confirmed, the BIA staff should proceed with securing a vendor based on the best combination of cost, availability, capacity, and reliability, ensuring the service aligns with both event needs and budget considerations.