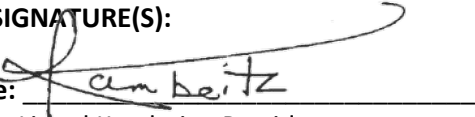


VIOLENCE PREVENTION POLICY

ABOVE FOOD™

(the “Company”)

POLICY AREA: Workers	EFFECTIVE DATE: July 1, 2024
POLICY NAME/TITLE: Violence Prevention (“Policy”)	APPROVED BY: Board of Directors APPROVED DATE: July 1, 2024
	REVIEW DATE: As necessary but at least once every 3 years or following any change of an element of this Policy.
Name / SIGNATURE(S): Signature:  Print: Lionel Kambeitz, President	DATE REVISION WAS APPROVED: None.

1. PURPOSE

Violence in the workplace is unacceptable and prohibited. This Policy outlines the provision of a safe, healthy and violence-free environment. The Company is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence. The Company is also committed to preventing and responding to all reports of workplace violence and to effectively address and resolve any such incidents that may arise.

2. ADMINISTRATION

In consultation with the Company’s workers, the Company has identified the risks of violence and developed procedures to eliminate and minimize the risks to workers.

Administering the Policy and ensuring it is reviewed and updated is part of management’s regular duties. The review and updates will be done in collaboration with the Human Resources Department and the Company’s workers. This Policy will be reviewed and, when necessary, updated at least once every 3 years or following any change to an element of the Policy. Management will ensure that workers are informed of revisions to this Policy and retrained on the revised elements of the Policy.

3. APPLICATION OF POLICY

This Policy applies to all of the Company's workers. This Policy applies both on and outside of Company property. Everyone must uphold this Policy and work together to prevent workplace violence.

4. PROCEDURES AND POLICIES

Reporting and handling of incidents of workplace violence shall occur as follows:

- (a) **In an emergency situation** – if an occurrence of violence poses an immediate danger, or if there is a threat of such an occurrence, please call 9-1-1 for emergency services (police, fire and ambulance). The incident should then immediately be reported to the worker's manager or supervisor.
- (b) **In a non-emergency situation** – workplace violence should be reported first to an immediate supervisor or manager. If the immediate supervisor or manager is the perpetrator of the violence, the incident should be reported to another manager in the line of authority or a member of the Human Resources Department.

Workplace violence is more than physical assault and includes attempted, threatened or actual conduct of a person that causes or is likely to cause injury, and includes any threatening statement or behavior that gives a worker reasonable cause to believe the worker is at risk of injury. Workplace violence also includes domestic or sexual assault. Examples of violence can include but is not limited to the following acts or attempted or threatened acts:

- verbal threats or intimidation
- verbal abuse, including swearing or shouting offensively at a person
- contact of a sexual nature
- kicking, punching, scratching, biting, squeezing, pinching, battering, hitting or wounding a person in any way
- attack with any type of weapon
- spitting at a person

Dealing with Potentially Violent Individuals:

If you witness or experience violence at work:

- if possible, remove yourself from the situation
- inform your manager or supervisor or seek help from a co-worker immediately
- if your manager or supervisor is the perpetrator, notify another manager in the line of authority or a member of the Human Resources Department
- if your physical security or well-being is threatened, and if possible, call 9-1-1

If you are dealing with a violent person:

- stay calm
- try to calm the other person or diffuse the situation (if you can)
- avoid saying or doing anything that could aggravate the situation
- avoid eye contact or sudden movements that can be perceived as threatening
- respect the person's personal space

- continue the conversation with the person only if the person calms down
- if the behavior persists, end the conversation
- politely notify the person that you will leave the work area or ask them to do so
- notify your manager or supervisor or seek help from a co-worker immediately
- if the person refuses to leave the premises and the situation escalates call 9-1-1

Opening and Closing Procedures or Working Late

Before you leave for work:

- Before you leave for work, visualize where you will park when you arrive
- Ensure that you have enough gas to get to and from work
- Visualize a backup plan if your arrival at work does not go as planned

When arriving at work:

- When arriving at work, if driving alone, ensure everything needed is on the front seat
- Drive into the parking lot with vehicle doors locked and windows rolled up
- Scan the area for suspicious persons when entering the parking lot
- If possible, park in an open, well-lit spot near an exit that is visible from within the workplace
- Gather personal belongings and have the building key in hand
- Scan the area for suspicious persons before getting out of the car
- Exit the vehicle when ready and safe and proceed directly and quickly to your workplace
- Do not reach back into the vehicle or linger beside it after exiting
- Lock the vehicle and walk quickly and directly to the workplace
- Use the main entrance and avoid back doors or secluded entrances

Returning to vehicle:

- Gather all belongings and prepare to leave the workplace
- If it is late at night have the keys for your vehicle in hand when exiting the workplace
- Scan the area for other people prior to leaving the workplace
- Use the main entrance to exit and avoid rear doors or secluded exits
- If closing, lock the doors to the workplace
- Walk directly and quickly to your vehicle and if possible, leave with other workers
- Walk with your head erect, look alert and scan your route
- Alert other workers in the workplace of your departure and if possible, exit while other workers watch you walk to your vehicle
- Once in your vehicle, lock all doors and keep windows up

Public Transit:

- Avoid isolated or poorly lit bus stops
- Plan your arrival at the bus stop to get you there just before your bus arrives
- If you are alone, or its late at night, sit near the driver
- If someone bothers you, tell the driver immediately
- If you see a suspicious or menacing individual at your stop, get off at the next stop
- When stepping off the bus, check to see if you are being followed. If you are, walk directly and quickly – without running or looking back – to a service station or store. Call 9-1-1.
- If possible, plan to have someone meet you at your home bus stop

In addition to observing the above procedures, workers responsible for opening and closing the workplace must observe the following rules:

- Enter and exit the workplace through the main entrance
- When opening the workplace, do not enter the workplace if you suspect or know that there has been a break-in
- Lock the workplace when leaving

If you are confronted:

- If attacked, scream – as loud and long as possible – and run to the nearest well-lit area
- If someone grabs your purse, deposit bag or other personal property, do not resist and do not chase the robber

Making Deposits

Workers responsible for making deposits must observe the following rules:

- Deposits are only made during the day
- The time the deposits are made should vary
- Do not take deposits or valuables home
- If someone grabs the deposit, do not resist and do not chase the robber

Daily Tasks to Prevent Violent Incidents

- The building entrances are to remain well lit. Report any lighting issues to your manager or supervisor.
- Video surveillance cameras are visible to visitors of the workplace at all times. Report any issues with video surveillance visibility to your manager or supervisor.
- Managers, supervisors and workers must ensure back doors or entries, other than the front door, are locked and can only be accessed by workers with a key or security card.
- Report violent incidents in accordance with this Policy as soon as they occur.
- All emergency phone numbers must be displayed prominently at reception.
- Identify escape routes and know how to exit in an emergency.
- Check outside lights each night to ensure they are on and working properly.
- Carry your cell phone.
- If there is a person or group of people who are suspicious, contact your manager or supervisor.
- Do not empty the garbage at night.

Active shooter

If you witness an incident involving an active shooter outside the building:

- stay out of sight (away from windows) and warn colleagues, clients and visitors
- leave the area at risk
- when safe to do so, call 9-1-1 and other building occupants if possible
- if you cannot evacuate the building safely, lock outside doors and close the blinds and curtains
- wait for instructions from first responders

If you witness an incident involving an active shooter inside the building:

- stay calm
- if you can do so safely, leave the area immediately

- warn others, as many as possible, without attracting the attention of the assailant
- if you can do so safely, call 9-1-1 and notify the other building occupants
- lock the doors or barricade yourself in a room using furniture
- block the windows, close the office blinds and curtains
- if the workspace has no door, hide under your desk or where you cannot be seen
- if you are in a washroom, remain there, if safe to do so
- silence your cellphone, turn off radios and computers
- if you cannot escape, remain silent and hide until first responders arrive
- wait for instructions from first responders

Bomb threat

If you are made aware of a bomb threat by telephone:

- listen to the caller calmly and do not interrupt them
- try to get as much information as possible, such as:
 - when the bomb is supposed to explode
 - where the bomb is located
 - description of the device
 - reason for the call or motivation for the threat
 - telephone number on the display screen (if possible)
- remember any details you can about the caller, such as:
 - approximate age
 - gender
 - accent
 - level of nervousness
 - any background noise
- call 9-1-1 and inform your manager or supervisor
- remain available to provide information to first responders

If you are made aware of a bomb threat by e-mail:

- save the email (or letter)
- call 9-1-1 and inform your manager or supervisor

If a bomb alert is activated (for example, over intercom):

- visually inspect your immediate work area including:
 - wastepaper baskets
 - storage areas
 - dislodged suspended ceiling panels
 - furniture that has been moved
 - closets
- inform your manager or supervisor of the results of your search
- if you find a suspicious package, do not touch it and call 9-1-1
- evacuate the building

5. RESPONSIBILITIES OF WORKERS

All workers must refrain from acts of violence. All workers are responsible, within their level of authority, to ensure a healthy, safe and violence-free work environment. Workers must follow

the procedures established to reduce the risk of violence, raise any concerns about workplace violence and must immediately report all violent incidents or threats as described in this Policy.

Where appropriate and safe, a worker should:

- inform a person committing violence that their actions are inappropriate and unwelcomed;
- report all occurrences of violence to their manager or supervisor and complete the incident report form attached hereto as Schedule "A";
- make every reasonable effort to resolve an occurrence of violence through negotiated resolution if they were a party to an occurrence;
- cooperate with the investigation process related to an occurrence; and
- respect the confidentiality of the information shared.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this Policy and the supporting procedures for addressing situations involving workplace violence. This Policy does not discourage a worker from exercising the worker's right under any other law.

6. INVESTIGATING VIOLENT INCIDENTS

Workplace violence is proactively addressed through effective incident reporting and investigating procedures and data analysis. Under this Policy, all violent incidents will be investigated by the Human Resources Department.

The Human Resources Department will make recommendations for corrective actions to prevent similar incidents from recurring. The Company will document deficiencies and the appropriate changes will be made. Workers in affected worksites will be informed of the results of the investigation and of any changes in the Policy and prevention plan that result. If changes require worker retraining, the training will be provided by the Company.

The Company pledges to respect the privacy of all concerned as much as possible. The Company will not disclose the circumstances related to an incident of violence, or the names of the complainant, the person alleged to have committed the violence, and any witnesses, except where necessary to:

- investigate the incident or to take corrective action,
- inform the parties involved in the incident of the results of the investigation and any corrective actions taken,
- inform workers of a specific or general threat of violence or potential violence, or
- comply with other legal requirements.

7. COMMITMENT TO TRAINING

The Company will ensure that all workers are aware of violence hazards and are properly trained to protect themselves and that all managers and supervisors have sufficient knowledge of such procedures. The Company will provide training to all employees, which includes:

- the means to recognize potentially violent situations

- procedures and controls that have been developed to minimize or eliminate the risks
- the appropriate responses of workers to incidents of violence
- procedures to obtain emergency assistance
- the procedures for documenting, reporting and investigating violent incidents

Where permitted by law, the Company will disclose information about persons with known histories of violence to workers at the Company's workplace. The Company will disclose only the minimum amount of personal information required that is necessary to inform workers of a specific or general threat of violence potential violence.

8. SEEKING MEDICAL AID AND INJURY AND POST-TRAUMATIC STRESS

Medical aid and counselling is available to any worker who is a victim of violence. An offer of medical aid and counselling will be made by the Company. The offer will be documented and every effort will be made to ensure the worker understands this offer at that time. Workers have a right to refuse medical aid and/or counselling at any time.

If a worker seeks medical aid or counselling, injury reports must be filed with the appropriate Workers' Compensation Board (WCB). Appropriate WCB forms must be completed and submitted.

9. NO LOSS OF PAY OR BENEFITS

Managers and supervisors will ensure victims of violent incidents do not lose pay or other benefits for visiting a physician or other health care specialist for treatment or counselling during work hours.

Schedule "A"
Violence Incident Report Form
(attached)