

## **ELECTRONIC MONITORING POLICY**

### 1. PURPOSE

The Solar Group Inc. ("Solar" or the "Company") understands the importance of technological innovation and that any adoption or use of technology must be done in keeping with our Company values of cooperation and respect.

The purpose of this Electronic Monitoring Policy (the "Policy") is to ensure that our employees are aware of when and why the Company may engage in workplace electronic monitoring.

# 2. SCOPE

This Policy applies to all employees of the Company.

## 3. **DEFINITIONS**

In this Policy, "electronic monitoring" means the Company's collection of information about an employee's activities through employer-owned equipment (including but not limited to Company trucks, ATVs and various elevating equipment), electronic devices and systems such as computers, computer networks, telephones, cell phones, and GPS units. It may also include the monitoring of email and internet use.

# 4. POLICY

The Company conducts electronic monitoring of employees, primarily for insurance and safety-based purposes. The following describes how, and in what circumstances, the Company may electronically monitor employees, as well as the purposes for which the Company may use the information obtained through electronic monitoring.

- 1. For the purposes of **network and cyber security**, on a continuous basis, the Company monitors the use of workstations and all incoming and outgoing network traffic, to detect abnormalities, report unusual activity, detect threats and prevent potential unauthorized use. When personal devices, such a tablets or cellphones, download and use the Company's applications, tracking is limited to the performance and operation of Company applications and work partitions.
- 2. For the purposes of web-traffic filtering, on a continuous basis, the Company tracks user website browsing and activity on any Company issued computer or tablet.

 For the purposes of data retention and auditing, on a continuous basis, the Company maintains a record of all user data that flows through email and Company applications and servers, and monitors actions on files uploaded to the Company's file-sharing platforms.

The Company reserves the right to monitor any electronic activity on the Company's servers or transmitted through the Company's networks. In most instances, such electronic monitoring is carried out passively by automated software, and employee anonymity and privacy is maintained. In rare cases, where a threat or unusual activity is detected, an individual may need to review specific activity related to a specific device or user.

The Company monitors the access and use of its IT and communication systems as reasonably required to protect its business interests and to meet its legal obligations. This is conducted for purposes including:

- 1. Protecting the integrity of the Company's IT and communications systems. This includes protection against computer viruses, damage to software or hardware, loss of Company documents or information, and protecting against excessive telephone or computer usage.
- 2. Protecting against unauthorized access or disclosure of the Company's confidential information, proprietary information, or employee or third party personal information in the Company's control.
- 3. In limited circumstances, conducting workplace investigations into alleged discrimination, harassment or violent behavior from or toward our employees.
- 4. Monitoring the use of email, text messaging and telephone systems to ensure that use is in accordance with Company policies.
- 5. Finding lost messages or data, or to retrieve data lost due to computer failure.
- 6. Following up on pending matters left by former employees.
- 7. In limited circumstances, assisting in investigations of alleged wrongdoing or violations of employer policies.
- 8. Complying with any other legal obligation.

In limited circumstances, the Company may, in its discretion, use information obtained through electronic monitoring to determine if there has been a violation of its policies. Where appropriate, such information may lead to discipline, including termination.

#### 5. INTERPRETATION

This Policy seeks to meet the requirements put in place by recent legislative changes. Nothing in this Policy shall be interpreted to create any greater right or benefit than what is available under existing legislation, or to restrict any of the Company's legal rights.

# 6. POLICY ADMINISTRATION

The Company will maintain and revise this Electronic Monitoring Policy as required to ensure it reflects current monitoring practices. The Company expressly reserves the right to change, modify or delete portions of this Policy without notice.

Neal Dance, President, is responsible for the administration of this Policy.

Employees will receive a copy of this Policy within 30 days of:

- The Policy's implementation;
- Any changes made to this Policy; or
- The employee's hire date, for any new employees.

If employees have questions about this Policy or about electronic monitoring, they may contact Neal Dance at 416.822.7203 or neal.dance@solarwindowcleaning.com.

Policy Prepared: September 2022
Policy Last Reviewed: March 2023
Policy Last Revised: March 2023

01/03/2023

Neal Dance President

The Solar Group Inc