

Maksteel – Electronic Monitoring of Employees Policy (Canada-Wide)

Company: Maksteel Holdings ULC

Effective Date: April 13, 2026

Last Updated: April 13, 2026

1. Purpose

The purpose of this policy is to provide transparency regarding Maksteel's electronic monitoring practices in compliance with applicable employment standards and privacy legislation across Canada, including provincial legislation and, where applicable, federal privacy principles.

This policy is intended to satisfy the mandatory requirements of the Ontario Employment Standards Act (ESA) and to align with privacy obligations in other Canadian jurisdictions.

2. Scope

This policy applies to all Maksteel employees in Canada, including full-time, part-time, temporary, contract, and remote employees, regardless of location, role, or work arrangement.

The application and interpretation of this policy may vary by province due to local legislative requirements, as outlined in Section 8 (Provincial Considerations).

3. Electronic Monitoring Practices

Maksteel may engage in electronic monitoring of employees, which may include, but is not limited to:

- Monitoring and logging activity on Maksteel-owned or Maksteel-managed computers, servers, and networks
- Monitoring access to Maksteel systems (e.g., login records, VPN access, authentication logs)
- Monitoring usage of Maksteel email systems, collaboration tools, and business applications
- Network and cybersecurity monitoring, including firewall, intrusion detection, and audit logs
- Video surveillance (CCTV) in common or secure work areas, where permitted by law

- Monitoring electronic access control systems (e.g., badge systems)

Monitoring is conducted only where reasonably necessary for legitimate business purposes and in accordance with applicable laws.

4. Circumstances Under Which Monitoring Occurs

Electronic monitoring may occur when employees:

- Use Maksteel-owned or Maksteel-managed equipment
- Access Maksteel systems, networks, or applications
- Enter or exit Maksteel facilities or secured areas
- Perform work-related duties using Maksteel resources

Monitoring is not intended to be continuous, intrusive, or excessive, and Maksteel seeks to respect employees' reasonable expectations of privacy.

5. Purpose of Electronic Monitoring

Information collected through electronic monitoring may be used for legitimate business purposes, including:

- Protecting Maksteel systems, data, and assets
- Ensuring cybersecurity and operational integrity
- Supporting system performance and troubleshooting
- Ensuring compliance with company policies and legal obligations
- Workplace health, safety, and security
- Investigating incidents, complaints, or potential misconduct

6. Use, Access, and Retention of Information

Information obtained through electronic monitoring:

- Is accessed only by authorized personnel

- Is safeguarded using appropriate security measures
- Is retained only for as long as necessary for its intended purpose or as required by law

Maksteel does not use electronic monitoring information for purposes inconsistent with this policy or applicable legislation.

7. Transparency and Employee Notification

Maksteel is committed to transparency regarding electronic monitoring practices. Employees will be informed of this policy and any material updates in accordance with applicable legal requirements.

Nothing in this policy creates a contractual right or alters the terms and conditions of employment.

8. Provincial Considerations

This policy applies nationally; however, legal frameworks differ by province:

Ontario:

Maksteel maintains this policy in compliance with the Ontario Employment Standards Act (ESA), which requires employers with 25 or more employees to disclose whether and how employees are electronically monitored.

Quebec:

In Quebec, electronic monitoring is governed by provincial privacy legislation, which requires that monitoring be necessary, proportional, and minimally intrusive, and that employees be informed of monitoring practices.

Alberta:

In Alberta, electronic monitoring is subject to the Personal Information Protection Act (PIPA), which requires that personal information be collected only for reasonable purposes and that employees receive appropriate notice and protections.

9. Policy Review and Updates

This policy will be reviewed periodically and updated as required. The effective date and revision date will be reflected in this document. Employees will be notified of any material changes.

10. Questions

Employees with questions regarding this policy or Maksteel's electronic monitoring practices may contact Human Resources or IT Management.