

Social Media Policy

OSL Defines Social Media as:

Internet based applications that allow people to create, share, discuss or exchange in virtual communities and networks various information, content, ideas, products and services. They may include pictures and or videos; they may allow for the exchange or sale of products and services in both public and private forums.

Use of Social Networking Sites

OSL recognizes that participating in online discussions, groups, chats – etc. and other social media activity is personal in nature but seeks to regulate such activity during work hours and when it impacts OSL, OSL employees and/or third parties (including clients) who deal with OSL.

Work Related Activity

During an employee's working time or while using any OSL provided equipment or systems at any time, employees are expected to limit the writing, posting or otherwise contributing to: blogs, personal websites or webpages, listservs or mailing lists, social or other networking sites, audio or video-sharing websites or other user-generated electronic media, that will adversely impact or impede an employee's performance of his or her job responsibilities.

Employees are not authorized to speak or issue statements on behalf of OSL Retail Services or its clients. Any additional client-specific and provided social media guidelines or policies should also be followed.

Non-Work Related Activity

Regarding their usage of networking services outside of work, employees should be mindful that information placed on any electronic medium and data sent via other electronic methods (e.g., email and text messages), may become public and may not be possible to delete or to "pull back." OSL Retail Services expects that its employees will act responsibly and exercise good judgment and the highest degree of professionalism and confidentiality when communicating any information that concerns or identifies OSL Retail Services and/or any of its products, services, clients or employees.

Employees should therefore refrain from making disparaging remarks about OSL Retail Services or any of its clients or customers where the identity of the company, client or customer is either disclosed or could be easily deduced.

In addition it is not appropriate to use your association with OSL Retail Services or its Client's on any social media site except for a legitimate required and authorized business purposes related to the performance of your duties as outlined within the Operations Manual. This also includes the use of OSL or its Client's branded logo's, images or any marketing material.

General

Employees making any remarks which could reasonably be construed as bringing OSL Retail Services into disrepute or causing any other detriment to OSL Retail Services may be subject to discipline, up to and including termination for cause.

Employees are required to ensure that they do not disclose any confidential information relating to the company, any of its clients or customers, or any of its employees through their use of social media or networking sites.

Employees should understand that it is their duty to protect OSL Retail Services's reputation, security and confidentiality when the employee engages in online social networking. Blogs and other media may be public and accessible to third parties, including OSL Retail Services's competitors, vendors and clients. Employees are required to ensure that they do not disclose any confidential information relating to the company, any of its clients or customers or any of its employees through their use of social networking sites. It is critical that the employee maintain the confidentiality of non-public OSL Retail Services information, as well as the proprietary nature of OSL Retail Services' intellectual property.

Employees who breach the confidentiality of the company or any client or customer or breach the privacy rights of other individuals, including co-workers, may be subject to discipline, up to and including termination for cause. This applies equally to misconduct carried out online as well as offline.

Employees are reminded that they are personally responsible for material they post on a blog or website. An employee should not rely on administrators of social networking websites to remove derogatory or harmful comments that they themselves have posted or that others have posted on their Facebook wall, for example. In addition, employees wishing to maintain blogs or websites should be aware that they could be held responsible for content (such as comments) posted by third parties.

OSL Retail Services has a duty to protect itself and all its employees from the possible consequences of comments which could affect its business, and it is for this reason that employees are required to be mindful of the possible far reaching consequences of discussing work issues on an open forum.

If an employee discovers online conduct or content that is inappropriate or in violation of OSL Retail Services policies, he or she is encouraged to immediately report it to OSL's Human Resources Manager.



OSL Vacation Policy

Purpose

OSL understands the importance of personal time off for its employees. Employees are encouraged to use their accrued paid vacation time for rest, relaxation, and personal pursuits. As such, the purpose of this policy is to explain the standards, guidelines, and procedures for paid vacation time for all corporate staff members.

Scope

This policy applies to all permanent corporate employees, with the exception of those in Quebec.

Vacation for non-corporate or field employees is outlined on individual employment offers. Contract employees, hourly employees and temporary employees are outside the scope of this policy.

Policy

All employees are expected to use their allotted vacation time in full every year. The following policy statements are intended to clarify paid vacation procedures:

- While employees begin to accrue vacation from the first day of employment, vacation can only be taken after three months of service. Any vacation granted before completion of three months of service is on an exception basis, as granted by the employee's manager and the Manager of Human Resources
- For vacation purposes, the reference year is the calendar year
- Vacation time and pay is earned and accumulated over the course of the year- please see next page for accrual in the first year of employment
- Where an employee is on a leave (i.e. not actively working in the business) protected under the Employment Standards Act, they will continue to accrue paid vacation time while on leave, and their regular annual vacation entitlement shall be kept whole.
- All vacation time must be approved by the employee's manager, in advance, using the Vacation Request Form
- Vacation entitlement must be taken as days off; employees do not have the option to select pay in lieu of vacation time
- Vacation must be scheduled in a fashion that does not conflict with the needs of the business
- Vacations for a calendar year must be taken in that calendar year. Vacation days may be authorized to be rolled over into the following year solely at the Company's discretion under certain circumstances and only until March 31st of the following calendar year. This means all vacation that has been carried forward from the previous year must be used in full by March 31st of the following calendar year. Instances such as these will be addressed on a case-by-case basis and must be approved by the immediate Manager in writing as well as the Manager of Human Resources
- While there is no rule on how you should take your vacation, employees are encouraged to take at least some of their vacation in blocks of time (i.e. one week) in order to allow sufficient time away from the business for rejuvenation
- Employees working a reduced work week will be prorated based on their weekly days
- Employees who exhaust their vacation and personal days in a calendar year and then are absent from work will take those days as unpaid. Employees may not utilize vacation days from the next calendar year
- Upon exit, all vacation accrued but not taken will be paid out



- Upon exit, all vacation taken but not accrued will be deducted from the final pay

Vacation Entitlement

New Hires:

Depending on the employee's start month, the number of vacation days available during the first calendar year are:

Hourly Employees	4%	Start Date	Number of Vacation Days		
			2 weeks entitlement	3 weeks entitlement	4 weeks entitlement
		January	10 days	15 days	20 days
		February	9 days	14 days	18 days
		March	8.5 days	12.5 days	17 days
		April	7.5 days	11 days	15 days
		May	7 days	10 days	13.5 days
		June	6 days	9 days	12 days
		July	5 days	7.5 days	10 days
		August	4 days	6 days	8.5 days
		September	3 days	5 days	7 days
		October	2.5 days	4 days	5 days
		November	2 days	2.5 days	3.5 days
		December	1 day	1 day	1.5 days

After 5 years of employment: ONE (1) additional week of vacation is granted, regardless of position, up to a maximum of 5 weeks.

In the year in which the 5 year anniversary is reached, additional vacation entitlement is as follows;

Anniversary Date in months;	Additional Days in anniversary year
January, February, March	4
April, May, June	3
July, August, September	2
October, November, December	1

For example, if you reach your 5 year anniversary in June of 2014, you will be entitled to an additional 3 days of vacation in 2014. In 2015, you will begin to accrue vacation at the increased rate.

Unacceptable Conduct Policy

Expectations

It is expected that as Associates with OSL Retail Services, we will follow the policies and processes outlined in our Operations Manual while carrying out our day to day jobs.

The purpose of this document is to clearly outline those behaviors that are in violation of our policies. This is referred to as “Unacceptable Conduct”, as this conduct is in direct conflict with the positive working environment we have created at OSL Retail Services and so will not be accepted.

Consequences of Unacceptable Conduct

Acts of Unacceptable Conduct are what OSL Retail Services categorizes as the most serious violations of our policies. This document provides fair and reasonable warning that any associate who engages in Unacceptable Conduct will be subject to disciplinary action, up to and including **immediate termination of employment with cause**.

Should an associate engage in Unacceptable Conduct as outlined below, their employment can be terminated immediately and the Performance Management Process may not apply.

Performance Management

For behaviors related to performance other than Unacceptable Conduct, the Performance Management Process will be utilized. The Performance Management process assumes that an associate's behavior or performance can improve with an appropriate plan in place.

During the Performance Management Process, the plan will be discussed between the associate and their manager, with specific, measurable goals put in place. Should these goals not be met within the agreed to timeframe, the associate will progress through the different stages of the Performance Management Process, ultimately to termination of employment if the necessary improvement in performance is not achieved.

Unacceptable Conduct

Behaviors

The table below outlines examples of Unacceptable Conduct by category:

Category	Description
Theft/Fraudulent Activity	<ul style="list-style-type: none"> • Falsification/unauthorized edit of payroll, sales or commission records • Falsification of incentive program submissions in any form up to and including for the purpose of personal gain • Use of company funds for "Petty Cash" or personal purposes • Misrepresentation of identity including giving false name, data and/or position • Falsification of performance reports, forms, and sales figures • Theft or misuse of Customer information • Processing a customer activation without the Customer present • Signing a contract on behalf of a Customer • Misuse of OSL/Walmart/Carrier/OEM assets and tools including systems, inventory, POP material, monies, etc. • Sales/Refund and/or credit/gift card fraud • Giving an unauthorized customer discount or benefit • Setting up a customer on a Carrier "Associate only" EPP plan • Unauthorized use of discounting or transactional modification • Unauthorized movement of inventory • Re-sale of subsidized, written off, demo or other handsets unless authorized by OSL Head Office • Processing personal transactions without the Wireless Manager or District Manager present, or the Wireless Manager processing personal transactions without having the District Manager or another Associate ring it in • Unauthorized creation, adjustment or modification of an account for yourself, friends, family members or customers
Unauthorized use of business communication tools	<ul style="list-style-type: none"> • Use of company issued handsets for other purposes besides demonstration, training and business • The access or utilization of any OSL, Carrier or third party system for any use other than official OSL business. This includes forbidding the access of any of these systems off premise of the OSL workplace. • Unauthorized modification or provisioning of own associate handsets, prizes or customer handsets • Use of Internet/Intranet/demo devices for non-business related purposes • Excessive use of associate handset or business phone during a scheduled shift
Unauthorized Systems Modification	<ul style="list-style-type: none"> • Unauthorized sharing of passwords, security codes and log-in ID's • Intentional breach of software licensing agreements • Intentional breach of privacy obligations such as providing unauthorized systems/information access to confidential customer information
Harassment and Substance Abuse	<ul style="list-style-type: none"> • Harassment of customers or associates <ul style="list-style-type: none"> • unwanted gestures, offensive and unwelcome comments or jokes • verbal or physical conduct of a sexual nature against an individual's wishes, such as unwanted touching and or bodily contact • repeated requests/invitations for dates that are turned down, sexual favours or unwanted flirting • Transmission or posting without consent of emails, pictures or written content on a website

	<ul style="list-style-type: none"> • Any form or threat, behavior or action such as harming or endangering the Safety of others; an act of aggression; or destroying or damaging property is considered an act of violence • Verbal or physical threats • Assault of any kind • Consumption of regulated or illegal drugs without medical justification, or alcohol, during a scheduled shift
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Category	Description
Insubordination	<ul style="list-style-type: none"> • Unjustified refusal to perform job related tasks (justification may include conflict with health & safety standards, etc.) • Intentional non-compliance with directives provided by Wireless Manager or District Manager
Loss Prevention Policies	<ul style="list-style-type: none"> • Intentional violation of Loss Prevention policies, as outlined in the Operations Manual. • Failure to report any incident or activity in accordance with the company escalation process for Loss Prevention or Harassment.
OSLRS Representation	<ul style="list-style-type: none"> • While wearing their uniform or while in uniform within the Walmart environment; OSL Associates are not to conduct personal business. This is including: Shopping from Walmart; or selling and/or trading personal property. ((Personal property includes, but is not limited to; handsets, accessories, electronics, etc.)) • OSL Associates will conduct any and all personal business either off shift; or during break times; but will not wear their uniform and name tag when doing so. • Outside of work OSL Associates are not allowed to represent themselves as an agent or representative of OSL or the Client without written authorization from OSL Head Office. • OSL Associates are not allowed to leverage their position as an agent or representative of OSL or the Client for personal gain.
Prizing/Awards	<ul style="list-style-type: none"> • OSL Associates will from time to time be given the opportunity to win various prizing, incentives and swag from it's clients and partners. These rewards are a benefit of employment at OSL and may not be sold or traded to the general public or leveraged for personal gain.

Note: The above list is not exhaustive, and does not imply that other acts do not fall within the parameters of Unacceptable Conduct.



Information Technology Policy

Introduction and Permitted Use

The computer network (including computers, computer files, the e-mail system, voice mail system Internet services and all software) is the property of OSL Retail Services and may only be used for legitimate business purposes. Users (including employees, consultants, contractors, agents, etc. of OSLRS) are provided access to the computer network to assist them in the performance of their jobs. Additionally, certain users may be provided with access to the Internet through the computer network.

All users have a responsibility to use OSL's computer resources and the Internet in a professional, lawful and ethical manner and to comply with this policy. Abuse of the computer network or the Internet, may result in disciplinary action, from loss of computer network privileges up to and including dismissal, and civil and/or criminal liability.

Computer Systems Security

Hardware Security – Hardware (i.e. laptops) should be locked in employees' cabinets or taken with the employee when they are out of the office. When out of the office, laptops and other hardware devices should be locked securely or stored in the trunks of vehicles when not in use. At all times, IT equipment should be treated with care and attention.

Anti-Virus, Anti-Spyware and Personal Firewall Software – Employees should ensure only OSL approved installed software is running on his/her computer. No attempts should be made to tamper with or disable the software.

Personal Usage- Personal use of OSL's computer and communication systems is permitted if such use is clearly insignificant compared to business use and complies with OSL's security policies.

Computer Network Use Limitations

The computer network, including e-mail and Internet access are provided for company purposes. Incidental personal use is permitted as long as it does not interfere in any way with the performance of the user's duties or other obligations to OSL and subject to each of the restrictions set out below:

- Interferes or competes with OSL business.
- Interferes with employee's job or the job of other OSL users.
- Involves any incremental cost to OSL.
- Involves any kind of commercial solicitation.



- Provides information about, or lists of OSL users to others.
- Involves commercial or personal distribution lists.
- Employees may not misrepresent themselves or masquerade as someone else on the network.
- Employees may not monitor network traffic or launch security testing tools with any software or device against any OSL network, server, or devices.
- Employees may not add any networking devices, such as hubs, network switches, routers, modems or wireless access points to any portion of the OSL network.
- Employees must be approved and registered to connect to the OSL network from a remote location.
- Employees must use one of the approved gateways to connect to the OSL networks. Employees should check with the IT department to determine what network services are available.

Prohibited Uses

The computer network may not be used to display, store or send destructive code (e.g., viruses, self-replicating programs, etc.), pornographic or offensive text or images or any other unauthorized materials. Users may not use OSL's Internet connection to play or download games or other entertainment software or use it for on-line trading, gambling or dissemination of trade secrets. Additionally, users may not use the computer network to display, store or send material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory or otherwise inappropriate or unlawful. Any employee who receives such material should notify the IT and/or HR Department immediately.

OSL strives to maintain a workplace free of harassment and is sensitive to the diversity of its employees. Accordingly, OSL prohibits the use of the computer network, the Internet and the e-mail system in ways that are disruptive or offensive to others or harmful to employee morale. For example, the display or transmission of sexually explicit images, messages and cartoons is not permitted. Other prohibited misuses include but are not limited to: ethnic slurs, racial comments or any other comments or images that could reasonably be expected to offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

Illegal Copying

Users may not copy material protected under copyright law or make that material available to others for copying. Users are responsible for complying with copyright law and licenses that may apply to software, files, graphics, documents, messages, and other material to be downloaded or copied. Users may not agree to a license or download any material for which a registration fee is charged without first obtaining the express written permission of OSL. OSL purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, OSL does not have the right to reproduce



such software for use on unauthorized computers. Users of OSL's computer network may only use software on local area networks or on multiple machines according to the applicable software license agreements. OSL prohibits the illegal duplication of software and its related documentation.

To ensure security and to avoid the spread of viruses, users accessing the Internet through a computer attached to OSL's network must do so through an approved Internet firewall or other security device. Bypassing network security by accessing the Internet directly by modem or other means is strictly prohibited. This also applies to users who have been approved for remote access to the OSL network. These users must make their connection through the path and approved Internet firewall specified by the IT department.

Duty to not to Waste or Damage Computer Resources

Accessing the Internet

Computer resources are not unlimited. Network bandwidth and storage capacity have finite limits and all users connected to the network have a responsibility to conserve these resources. As such, users must not perform acts that waste computer resources or unfairly monopolize resources to the exclusion of others. These acts include but are not limited to: sending spam, mass mailings or chain email, spending excessive amounts of time on the Internet or e-mail, playing games, engaging in online chat groups, uploading or downloading large files, or otherwise creating unnecessary strain on network traffic associated with non-business-related uses of the Internet or e-mail.

Files obtained from sources outside OSL including disks brought from home, files downloaded from the Internet, newsgroups, bulletin boards or other online service, files attached to email and files provided by customers or suppliers may contain dangerous computer viruses that may damage the computer network. As a result, users must not download files from the Internet, accept e-mail attachments from outsiders, or use disks from non-Company sources without first scanning the material with the OSL-approved virus checking software. For users approved for remote access to the OSL network, a remote connection may only be made after the OSL-approved virus program has been installed. If you suspect that a virus has been introduced into OSL's network, notify the IT department immediately.

Employees of OSL are prohibited from downloading and/or installing software (notwithstanding appropriate licenses) without the prior approval of the IT department. Employees should contact the IT department for further information.

No Expectation of Privacy





Users are provided computers, e-mail and Internet access to assist them in the performance of their jobs. Users should have no expectation of privacy in anything they create, store, send or receive using OSL's computer network and resources. The computer network is the property of OSL and, as set out above, is to be used for company purposes. Users consent to allow IT personnel access to and review of all materials created, stored, sent or received by them through any OSL network or Internet connection.

OSL has the right to monitor, inspect and log any and all aspects of its computer network including but not limited to: monitoring Internet sites visited by users, monitoring chat and newsgroups, monitoring file downloads, e-mail and all communications sent and received by users. Since OSL is sensitive to the legitimate privacy rights of employees, every effort will be made to ensure that any such monitoring is done in an ethical and respectful manner.

Ownership of Data

Subject to local legislation, all data and information created, stored, acquired or transmitted on company computing systems is exclusively owned by OSL (or the client, in certain circumstances). You may not remove OSL or client data from OSL offices on any medium or removable storage devices, without express approval from your manager. All such data must be returned to OSL, or irretrievably deleted, upon completion of the approved activity.

Client Data

If an employee receives confidential data from a client, he/she must comply with their instructions for protecting their data. Any questions concerning protection of the information should be discussed with his/her direct supervisor. As a matter of course, all data received from our clients must be treated with the same level of confidentiality as our own. Care must be taken to handle sensitive client data appropriately. Confidential client material should be labeled and stored securely. Documents that are sent via electronic transmission (email or faxed) should always be sent with a statement of Confidentiality. Letters and packages must be labeled and handled appropriately with proof of delivery where necessary. Additionally, appropriate steps must be taken when disposing of client confidential materials (i.e., secure shred or proper disposal of technology assets via the helpdesk).

Blocking Sites with Inappropriate Content

OSL has the right to utilize software that makes it possible to identify and block access to Internet sites containing sexually explicit or other material deemed inappropriate in the workplace. If an internet site is not blocked then this DOES NOT mean that its content is necessarily appropriate. Employees are still required to use their judgment and to obey the requirements of this policy.

Protection and Security





Users must only use those computer network resources which OSL has authorized for their individual use. The computer network system is protected against unauthorized use by employee identification codes and passwords. These codes are personal and must not be disclosed to or used by anyone else. Screensaver protection should be used whenever the computer is on and left without control. Any concerns should be directed to the IT department. Using a false identity is strictly prohibited.

Cautions

Users should be aware that the nature of e-mail and the public character of OSL's business make e-mail less private than may be anticipated. E-mail may be forwarded, modified and widely distributed without a users' knowledge or consent. Even after e-mail is deleted it may be retained on back-up systems. Users should carefully consider these factors before using e-mail to send messages or documents that are sensitive or confidential in nature and should refrain from doing so if there is any doubt as to the security of the transmission. Where it is necessary to retain a record of an e-mail for long-term use, it should be transferred to a more lasting format.



Anti-Harassment and Violence Policy

Purpose OSL Retail Services Inc. is committed to building and preserving a safe working environment for its employees. In pursuit of this goal, OSL Retail Services Inc. does not condone and will not tolerate acts of harassment and/or violence against or by any OSL Retail Services Inc. employee. As such, this policy prohibits physical or verbal threats – with or without the use of weapons – intimidation, or violence in the workplace to minimize risk of injury or harm resulting from violence to OSL Retail Services Inc. employees.

It is also a violation of OSL Retail Services Inc.'s Anti-Harassment and Violence Policy for anyone to knowingly make a false complaint of harassment or violence, or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

**Workplace Anti-Harassment/
Anti-Violence
Policy**

Our workplace harassment policy is not meant to stop free speech or to interfere with everyday social relations.

However, what one person finds offensive, others may not. Generally, harassment is considered to have taken place if the person knows, or should know, that the behavior is unwelcome. Usually, harassment can be distinguished from normal, mutually acceptable socializing.

Harassment is offensive, insulting, intimidating, and hurtful. It creates an uncomfortable work environment and has no place in employee relationships.

Definitions

i. **Personal harassment** is any unsolicited, unwelcome, disrespectful or offensive behaviour that has an underlying sexual, bigoted, ethnic or racial connotation and can be typified as:

- an implied or expressed threat of reprisal for refusal to comply with a sexually oriented request;
- a demand for sexual favours in return for (continued) employment or more favourable employment treatment;
- unwelcome remarks, jokes, innuendos, propositions, or taunting about a person's body, attire, sex or sexual orientation and/or based on religion;
- suggestive or offensive remarks.
- bragging about sexual prowess
- offensive jokes or comments of a sexual nature about an employee
- unwelcome language related to gender
- displaying of pornographic or sexist pictures or materials;
- leering (suggestive persistent staring);
- physical contact such as touching, patting, or pinching, with an underlying sexual connotation;
- sexual assault; for the most part, victims of sexual harassment are female. However, conduct directed by female employees towards males and between persons of the same sex can also be held to constitute sexual harassment.

ii. **Racial Harassment Ethnic Harassment**

Racial or ethnic harassment is defined as any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their colour, place of birth, citizenship or ancestry.

- Examples of conduct which may be racial or ethnic harassment includes:
- unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin,
- colour, place of birth, citizenship or ancestry.
- displaying racist or derogatory pictures or other offensive material.
- insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment.
- refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.

iii **OSL Retail Services Inc. strictly prohibits violence in the workplace.**

We are committed to providing a safe and healthy work environment free from violence, threats of violence, harassment, intimidation and disruptive behaviour for all our employees. OSL Retail Services Inc. firmly believes that by working together with our employees, the risk of workplace violence can be minimized.

"workplace violence" means :

- 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 causes or could cause physical injury to the worker
- a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that causes or could cause physical injury to the worker
- In the event that an employee is either directly affected by or witness to any violence in the workplace, it is imperative for the safety of all OSL Retail Services Inc. employees that the incident be reported promptly.
- report any violence or potentially violent situations immediately to management, or the Human Resources department.
- all reports shall be kept confidential.
- all reports shall be investigated, and dealt with appropriately.
- any OSL Retail Services Inc. employee who threatens, harasses or abuses another employee, or any other individual at or from the workplace shall be subject to disciplinary action, up to and including termination of employment, and the pursuit of legal action.
- Violent action, threats and harassment are serious criminal offences, and shall be dealt with appropriately.

iv. **Managing and/or coaching** that includes counseling, performance appraisal, work assignment, and the implementation of disciplinary actions, is not a form of personal harassment, and the policy does not restrict a manager/supervisor's responsibilities in these areas.

**Application of this policy**

This policy applies to all those working for the organization including front line employees, contract service providers, managers, officers or directors. The organization will not tolerate personal harassment whether engaged in by fellow employees, managers, officers, directors, or contract service providers of the organization.

OSL Retail Services Inc. will not tolerate any form of harassment or discrimination against job candidates and employees on any grounds mentioned above, whether during the hiring process or during employment. This commitment applies to such areas as training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

All OSL Retail Services Inc. employees are personally accountable and responsible for enforcing this policy and must make every effort to prevent discrimination or harassing

Procedure for Reporting Discrimination or Harassment**Informal Procedure**

If you believe you have been personally harassed you may:

- confront the harasser personally or in writing pointing out the unwelcome behaviour and requesting that it stop; or
- discuss the situation with the harasser's supervisor, your supervisor or any other supervisor other than your own.
- Any employee who feels discriminated against or harassed can and should, in all confidence and without fear of reprisal, personally report the facts directly to your supervisor or manager.

Formal Procedure

If you believe you have been personally harassed you may make a written complaint. The written complaint must be delivered to OSL Retail Services Inc. Your complaint should include:

- the approximate date and time of each incident you wish to report
- the name of the person or persons involved in each incident
- the name of any person or persons who witnessed each incident
- a full description of what occurred in each incident

Procedure for Reporting Discrimination or Harassment

Once a written complaint has been received OSL Retail Services Inc. will complete a thorough investigation. Harassment should not be ignored. Silence can, and often is, interpreted as acceptance.

The investigation will include:

- informing the harasser/s of the complaint
- interview the complainant, any person involved in the incident and any identified witnesses
- interview any other person who may have knowledge of the incidents related to the complaint or any other similar incidents
- A copy of the complaint, detailing the complainant's allegations, is then provided to



the respondent(s).

- The respondent is invited to reply in writing to the complainant's allegations and the reply will be made known to the complainant before the case proceeds further.
 - The Company will do its best to protect from unnecessary disclosure the details of the incident being investigated and the identities of the complaining party and that of the alleged respondent.
 - During the investigation, the complainant and the respondent will be interviewed along with any possible witnesses. Statements from all parties involved will be taken and a decision will be made.
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 - If necessary, the Company may employ outside assistance or request the use of our legal counsel.
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 - Employees will not be demoted, dismissed, disciplined or denied a promotion, advancement or employment opportunities because they rejected sexual advances of another employee or because they lodged a harassment complaint when they honestly believed they were being harassed.
- Where it is determined that harassment has occurred, a written report of the remedial action will be given to the employees concerned.

If the complainant decides not to lay a formal complaint, Senior Management may decide that a formal complaint is required (based on the investigation of the incident) and will file such

document(s) with the person(s) against whom the complaint is laid (the respondent(s)) and the Directors of the Company.

If it is determined that personal harassment has occurred, appropriate disciplinary measures will be taken as soon as possible.

Disciplinary Measures

If it is determined by the company that any employee has been involved in personal harassing of another employee, immediate disciplinary action will be taken. Such disciplinary action may involve counseling, a formal warning and could result in immediate dismissal without further notice.

This Anti-Harassment and Violence Policy must never be used to bring fraudulent or malicious complaints against employees. It is important to realize that unfounded/frivolous allegations of personal harassment may cause both the accused person and the company significant damage. If it is determined by the company that any employee has knowingly made false statements regarding an allegation of personal harassment, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal without further notice.

Special Circumstances

Should an employee have a legal court order (e.g. restraining order, or "no-contact" order) against another individual, the employee is encouraged to notify his or her supervisor, and to supply a copy of that order to the Human Resources Department. This will likely be required in instances where the employee strongly feels that the aggressor may attempt to contact that employee at OSL Retail Services Inc., in direct violation of the court order. Such



information shall be kept confidential.

If any visitor to the OSL Retail Services Inc. workplace is seen with a weapon (or is known to possess one), makes a verbal threat or assault against an employee or another individual, employee witnesses are required to immediately contact the police, emergency response services, their immediate supervisor, and the Human Resources Department.

All records of harassment and violence reports, and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law. In cases where criminal proceedings are forthcoming, OSL Retail Services Inc. will assist police agencies, attorneys, insurance companies, and courts to the fullest extent.

Confidentiality

OSL Retail Services Inc. will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. OSL Retail Services Inc. will protect this privacy so long as doing so remains consistent with the enforcement of this policy and adherence to the law.

Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation or disciplinary action. Any disciplinary action will be determined by the Company and will be proportional to the seriousness of the behaviour concerned. OSL Retail Services

Inc. will also provide appropriate assistance to any employee who is victim of discrimination or harassment.

Employee/Supervisory Roles in Maintaining a Positive Work Environment

As an employee of OSL Retail Services Inc., you have the following responsibilities to our workplace. We trust that all of our employees will help us eliminate harassment from our workplace.

Co-worker's Role

If you are a co-worker who has witnessed harassment in the workplace:

- Inform the harassed person that you have witnessed what you believe to be harassment and that you find it unacceptable. Support is often welcome. If that person does not feel that they have been harassed, then normally the incident should be considered closed.
- Inform the harasser(s) that you have witnessed the act(s) and find it unacceptable. (See Frequently Asked Questions below)
- Encourage the harassed person to report the incident to their Manager.

Manager's and Management's Role

Legally, management is responsible for creating and maintaining a harassment-free workplace.

Managers must be sensitive to the climate in the workplace and address potential problems



before those problems become serious.

If a manager becomes aware of harassment in the workplace and chooses to ignore it, that Manager and the Company risk being named co-respondent in a complaint and may be found liable in legal proceedings brought about by the complainant and/ or local human rights' authorities.

When an employee has asked their manager to deal with a harassment incident, the manager should:

Support the employee without prejudging the situation.

Work with the employee and document the offensive action(s) and have the employee sign a complaint.

Contact their superior and/or senior management and provide details of the incident on behalf of the employee.

Continued..



**Frequently
Asked
Questions**

What happens to the people who complain of harassment in the workplace just to retaliate against someone they don't like or get along with?

This is a very unusual situation and more likely to occur when employees are not informed about the definition(s) of workplace harassment. An explanation of the complaint procedure would discourage this type of complaint. Frivolous complaints could result in disciplinary procedures.

What protection is there for me if I am falsely accused of sexual harassment? My career and reputation could be ruined.

The procedure for investigation is clearly laid out and investigations are to be done confidentially and impartially. If there is no merit to a complaint, this will be documented by report. It is important to understand the philosophy of the sexual harassment policy. OSL Retail Services Inc. is required by statute to keep the work environment free of sexual harassment. All reasonable complaints must be investigated. Retaliation against any employee as a result of a complaint will not be tolerated. If you feel you are being treated unfairly after the initial complaint, you may complain of retaliation through the same procedure. Confidentiality is emphasized in every case to ensure protection of your reputation.

How can the investigation be kept confidential if everyone knows what is going on?

Confidentiality is identified as a major concern in all interviews carried out as part of an investigation of any harassment complaint. The employee grapevine is a part of every company and certainly beyond our ability to control. It is the responsibility of the investigator to discuss the complaint only with those who might have knowledge of the situation. Please recognize if a complaint has no merit, there can be damage done to an individual who has been accused. We encourage those with information to support the complaint process and then to leave the conclusions to the investigators.

If someone tells a dirty or ethnic joke, is that harassment?

Yes, inappropriate humor is a form of unacceptable behaviour that would be considered harassment. Humour is cherished in our society and no one likes to be accused of not having a sense of humour. If someone objects about the sexual nature of jokes, they have a right to complain. They should use discretion and keep humour appropriate to a work environment. A person has to be offended for a joke to be harassment. Use common sense.

Is a picture of a nude woman/man in my locker or desk considered sexual harassment?

Yes, such pictures have no place in a work situation, employees, clients or visitors may see it and be offended or humiliated by it, as they not only may be offensive but also reflect poorly on the company image.

Will the person who harassed me go to jail?

If you have been sexually assaulted, a criminal action has occurred and the individual could face criminal charges. Sexual harassment is not considered under criminal law, but rather as a discriminatory employment practice. As an employer, our Company is required to obey



applicable provincial and/or federal statutes protecting against discrimination in employment.

How serious is sexual harassment at OSL Retail Services Inc.? Why is this kind of emphasis being put on the subject?

Harassment, of any kind, may occur in any company and we will not tolerate this behaviour. This comprehensive policy is meant to ensure every employee knows what to do if incidents occur. We believe the problem is best dealt with by education for both management and employees.

If I'm accused of sexual harassment, may I hire a lawyer?

You may wish to consult with a lawyer. If you cooperate during the investigation, you should be able to expect fair treatment by the OSL Retail Services Inc. Employees who ignore or abuse the investigative process will be subject to disciplinary procedures.

Could I be sexually harassed by someone of the same sex?

Yes. Sexual harassment can include a homosexual or lesbian approach.

What about an employee who wears revealing or provocative clothing? Aren't they asking for it?

This concern is misplaced. No employee should be subjected to harassment under any circumstances. Sexual harassment often is an expression of power - not sexuality, and a person who is dressing in any particular fashion is not necessarily a target. Individuals who do not report sexual harassment have sometimes expressed the feeling that their clothing, on some occasion, may have given a harasser the wrong impression.

So far my supervisor has only harassed me once. I told him/her to stop and he/she hasn't done it again yet. Is this harassment?

If the supervisor has stopped the practice you are objecting to, you should consider the incident over. If it starts in the future, you may wish to pursue a complaint.

If someone else is being harassed, do I have to get involved as a witness? It's their problem, not mine.

You cannot be compelled to become involved. However, we trust all employees will help us eliminate harassment of any kind from our workplace. A positive respectful work place benefits everyone and we must all be proactive.

How do you decide if it's sexual harassment if there were no witnesses and it's just one person's word against another?

Many sexual harassers repeat their actions with other employees. Investigations can include former employees who have experienced this behaviour. Witnesses are not always required to establish what has occurred.



OSL Scanner Acceptable Use Policy

Purpose

To communicate appropriate and responsible use of printers and scanning in the wireless centre.

Scope

This OSL Scanner Acceptable Use Policy applies to all retail wireless centre associates as well as any contract associates who may be using company wireless centre equipment.

Scanning Services

Each OSL wireless centre will be outfitted with one printer that has scanning ability. The printer may be accessed by all staff assigned to the wireless centre. Instruction will be given on how to operate scanning services and a manual on operation of the printer may be found in the wireless centre. Assistance can be provided by the District Manager if required.

Appropriate Use

Associates may use printers in wireless centres to complete the following scanning duties:

- Scan customer contracts into the OSL wireless centre POS system – RQ4
- Scan customer receipts into the OSL Retail Services wireless centre POS system – RQ4
- Scan count sheets and other similar reports requested by OSL Management
- Employee forms as requested by Management

No other use of the scanner is allowed.

Non-Compliance

Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

WAL-MART

PCI COMPLIANCE - CASHIER

STANDARDS OBSERVATION CHECKLIST (S.O.C.)

OBJECTIVE: TO PROTECT THE CONFIDENTIALITY OF OUR ASSOCIATES, OUR BUSINESS AND OUR CUSTOMERS' PERSONAL & CONFIDENTIAL INFORMATION

CHECK <input checked="" type="checkbox"/>	STEPS	INFORMATION
<u>BEFORE YOU START</u>		
___ WHAT IS PCI COMPLIANCE?		The commonly used acronym for Payment Card Industry Compliance.
___ WHAT IS THE OBJECTIVE OF PCI?		To identify every process that uses payment card information and ensure that all means of protection are in place.
___ WHAT ARE THE CONSEQUENCES OF NON-COMPLIANCE?		Wal-Mart could face fines of up to \$500,000 (per incident resulting in loss or theft of customer information) as well as costs incurred in relation to the fraudulent activities. The company may also be disallowed and/or restricted from accepting the specific credit card going forward.
<u>ACCEPTING CREDIT CARDS</u>		
___ APPROVE CREDIT CARD		Credit Card purchases require the credit number be approved.
___ VERIFY CUSTOMER'S SIGNATURE		<ul style="list-style-type: none"> If the register prompts "Compare Signatures," verify the Customer's signature and expiration date to ensure the card is current. <p><i>Note:</i> If the credit card is not signed, politely ask the Customer to sign the card and then ask for a valid, current, government-issued form of ID.</p> <ul style="list-style-type: none"> Compare the Customer signature on the credit card to the signature on the ID.
___ ASK CUSTOMER TO SIGN COPY OF THE CREDIT CARD		<ul style="list-style-type: none"> Ask customer to sign the store (imprinted) copy of the credit card Only the last digit of the account number is displays. The other account numbers display as asterisks (*****6).
___ GIVE THE CUSTOMER THEIR CARD AND RECEIPT		
___ PLACE SIGNED CREDIT SLIP IN THE REGISTER DRAWER		Place signed STORE copy of the credit slip in the register drawer
<u>AUTHORIZATION STATUS CODES</u>		
___ PICK UP CARD		<p><i>(If card is expired or not valid)</i></p> <ul style="list-style-type: none"> We have been instructed by the credit card company to retain this card. Politely inform the Customer that we have been instructed to pick up the card. Give the Customer the phone number on the back of the card. The Customer now has the option of paying for the merchandise with cash, check, or another credit card. Either a CSM or an Accounting Office Associate takes the card to the Accounting Office. The Accounting Office Associate sends the card to the appropriate company. For more information regarding picking up cards, see Accounting

WAL-MART

PCI COMPLIANCE - CASHIER

STANDARDS OBSERVATION CHECKLIST (S.O.C.)

OBJECTIVE: TO PROTECT THE CONFIDENTIALITY OF OUR ASSOCIATES, OUR BUSINESS AND OUR CUSTOMERS' PERSONAL & CONFIDENTIAL INFORMATION

CHECK <input checked="" type="checkbox"/> STEPS	INFORMATION
<p>____ GIVING REFUNDS ON CREDIT CARD PURCHASES</p>	<ul style="list-style-type: none"> • If the Customer has a receipt and the item was purchase by credit card, any refund must be issued by credit to the credit card that was originally used to purchase the item. • If the Customer has a receipt, but does not have the original credit card of purchase, scan the transaction code (TC) number on the receipt. The register automatically applies the credit to the credit card of original purchase. • If the register cannot apply the credit to the credit card number when the TC number is scanned, and the original credit card of purchase is not available, any refund should be processed with a Shopping Card/Gift Card.

Uniform Policy

Purpose

Associate adherence to the company's uniform requirements and dress code standards contribute to OSL Retail Services' ongoing commitment to professionalism, and the provision of an identifiable, consistent image of the services we provide. The purpose of this policy is to inform associates about uniform and dress code requirements, including appropriate wear and uniform request procedures.

This policy applies to retail field associates working in the Walmart Wireless environment on behalf of OSL.

Definitions

- **Basic Uniform:** Associate uniforms consist of the designated shirt provided by OSL at the start of employment and the accompanying name tag, black pants and black shoes.

Definition:

- **Black shoes:** athletic shoes are allowed providing they are ALL Black, in good condition, clean and have no outstanding logos or decoration.
- **Black Pants:** dress pants or black khakis are allowed; they must be clean, pressed and belted where possible.
- **Name Tag:** this will be provided by Walmart during your orientation.

Promotional Uniform: Associate promotional uniforms consist of designated shirt provided by OSL for seasonal or sales blitz periods and the directed pants and shoes required. Turtlenecks, undershirts, long sleeve t-shirts, etc. must be worn underneath the OSL uniform shirt.

Supplementary Clothing: The following items are not allowed without prior authorization from OSL Head Office: sunglasses, hats, non-OSL sweaters/jackets, lanyards, neck scarves, etc.

Uniform Policy

All associates are required to wear the basic uniform during their shifts unless they are issued and instructed to wear a promotional uniform. The appropriate uniform must be worn during work hours, and may be worn during the commute to and from the work site. Uniform requirements, including supplementary clothing to be worn with the uniform shirt, may change at any time at the discretion of OSL.

Uniforms Allocation

OSL will provide Wireless Managers and full time Sales Associates with four (4) basic uniform shirts and part time Sales Associates with two (2) basic uniform shirts at the beginning of their employment, at no charge to the associate. Associates will be required to provide OSL with their appropriate shirt size. If an



associate finds that the size of shirt they indicated does not in fact fit them then they will not have to cover the costs of a replacement shirt in the correct size provided the original shirt is returned.

Associates will supplement the uniform shirt with black slacks and black casual or formal dress shoes, provided by the associate at their own expense. These items are also considered part of the uniform. The basic uniform shirt and supplementary clothing will be worn throughout the majority of the year.

Promotional Uniforms

During sales blitz periods and seasonal promotion times, associates may also be assigned additional or alternative pieces of uniform to reflect the spirit of the promotional period. These uniform items will be provided by OSL at no cost to the associate. Associates must wear these additional uniform items in lieu of their basic uniform as required for the duration of the promotional period.

Modifications and Accessories

In order to maintain the integrity of the brand being represented, associates are not allowed to make any type of modifications to their uniforms. This includes any removals or additions of any kind to the uniform itself. The adornment of pins, ribbons, and other such accessories on the uniform will not be allowed, unless they are at the direction of OSL.

Any supplementary items of clothing that the associate wears while working outside (hats, sunglasses, etc.), for medical reasons (e.g. eyeglasses, medical alert bracelets), and for modesty or religious purposes (long sleeved undershirts, headscarves etc.) must have minimal or no visible logos. Efforts should be made by the associate to coordinate these items with their assigned uniform pieces.

Appearance and Grooming

Associates must present a professional appearance at all times. Uniforms must be kept clean and neat for work shifts. Associates should take proper steps to follow uniform wash and dry instructions in order to minimize worn out, shrunken, and frayed appearances.

Proper grooming methods should be regularly utilized. Associate hair and facial hair should have a clean, neat appearance. Proper personal hygiene must be maintained at all times. Every effort should be made to keep facial/body piercings; tattoos – etc. minimal and covered up appropriately.

Tips to a Clean and Professional Appearance

- Clean shaven or well groomed
- Always wear a clean uniform
- Keep hands and fingernails clean and conditioned
- No eating at the Wireless Centre/sales floor
- Always wash hands
- Cover cuts and scrapes with a bandage
- Maintain personal hygiene (shower, use deodorant, brush teeth, comb your hair etc. before the start of each shift)



End of Employment

When an associate contract is terminated, all uniforms must be returned back to OSL Retail Services no more than one week after the associate's last shift. Items that have not been returned by this deadline may result in deductions from the associate's final salary equivalent to the basic uniform cost.

Uniform Replacement

Associates will receive a new set of basic uniforms from OSL Retail Services on a yearly basis. Associates may also receive a new set of uniforms if any changes are made and OSL Retail Services deems it appropriate for all associates to receive a new uniform. In these circumstances, the new sets of uniform will be provided to associates at no cost. Associates also have the option of requesting replacement uniforms as detailed below.

Request Process

All associate requests for new uniform items must go through a formal request procedure. Associates are required to fill out the Uniform Replacement Request Form, indicating reasons for the request and the appropriate shirt size, and submit the form to their manager/direct supervisor or to the project manager.

Associates requesting replacement uniforms will not be required to cover the costs if:

- The associate uniform was accidentally damaged while conducting work at the work site;
- The associate uniform has become frayed due to regular wear and tear (at the discretion of the manager/direct supervisor); or if
- The associate becomes pregnant, and requests a bigger size to accommodate maternity wear.

Associates will have to pay for requests for new uniform pieces if:

- The associate uniform was damaged while the associate was off duty or off the work site;
- The associate requires a bigger or smaller size for reasons other than pregnancy; or if
- The uniform item becomes lost or stolen.

Replacement request reasons that fall outside of these parameters will be handled on a case by case basis at the discretion of the associate's manager/direct supervisor and the project manager as required.

Current associate costs for a replacement uniform shirt are \$35 and are subject to change. Payment for a replacement uniform shirt will be taken out of an associate's wages from the payroll period following approval of the replacement request.

See the Uniform Replacement Request Form for more details.



Non-Compliance

Violations of this policy will be treated like other allegations of wrongdoing at OSL Retail Services. Allegations of misconduct will be adjudicated according to established procedures. Sanctions for violation of this policy may include, but are not limited to, one or more of the following:

- Disciplinary action according to applicable OSL Retail Services policies;
- Termination of employment; and/or
- Legal action according to applicable laws and contractual agreements.



By signing below, I acknowledge that I have read each policy and understand how this policy affects me and understand the guidelines and requirements of each:

- OSL Social Media Policy
- OSL Vacation Policy
- OSL Unacceptable Conduct Policy
- OSL IT Policy
- OSL Retail Anti-Harassment and Violence Policy
- OSL Scanner Acceptable Use Policy
- OSL Walmart PCI Compliance Standards Observation Checklist
- OSL Uniform Policy

I agree to adhere to this policy and will ensure that employees working under my direction (if applicable) adhere to this policy. I understand that if I violate the rules of this policy, I may face legal, punitive, or corrective action, up to and including termination of employment and/or criminal prosecution.

Employee Signature