

| STATEMENT of POLICY and PROCEDURE TOLKO INDUSTRIES LTD. | | | |
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| Manual: | Human Resources | | |
| Section: | Employee-Related Policies | Issued: | April 10, 2014 |
| Subject: | Electronic Monitoring and Surveillance Policy | Effective: | May 1, 2014 |
| Issued To: | Heffley Creek Division | Replaces: | |
| Owner: | Plant Manager | Version: | 1.0 |

1 PURPOSE OF THIS POLICY

The purpose of this policy is to inform all persons attending at Tolko's Heffley Creek Division about Tolko's use of video surveillance cameras on site.

2 SCOPE

This policy governs the use of video cameras used in the Heffley Creek Division and applies to all employees, contractors and visitors.

3 PURPOSE OF VIDEO SURVEILLANCE

Electronic monitoring and security surveillance shall be used only where reasonable and necessary for the following purposes:

- safety of employees, including the review of stored information for non-disciplinary fact-finding following a safety incident;
- protection of assets and property;
- to assist personnel in the efficient operation, maintenance and improvement of its equipment, processes and systems; and
- the possible disclosure of stored information to law enforcement agencies engaged in a criminal investigation or as compelled by law.

The use of video surveillance for these purposes has been determined after careful consideration of whether other alternatives are available which meet these purposes. It is not the intent to use electronic surveillance to monitor the work ethic or behaviour of employees, or to discipline any employee.

4 COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Video surveillance by its nature collects Personal Information as defined in the *Personal Information Protection Act*. Therefore, any video surveillance that Tolko conducts for any purpose must comply with applicable privacy laws. Tolko will not collect, use or disclose any Personal Information collected by way of video surveillance except for the purposes specified above and in the manner described below, unless otherwise authorized or required by law.

Tolko reserves the right to amend this Statement of Policy and Procedure, including with respect to additional cameras that are added to the surveillance network from time to time.

5 VIDEO SURVEILLANCE SYSTEM

Tolko has carefully selected the locations and camera surveillance system functions to collect and use the minimum Personal Information required to meet the purposes identified above. Details about the surveillance system are as follows:

5.01 Locations

Cameras will be located in the following areas:

Plywood

- Near the dryer 3 outfeed by the south end layup line stairs;
- North of the press unloader-ceiling mount;
- Plywood hog trench.

Green End

- On the lathe;
- Step feeder;
- Chipper belt;
- Trays to chipper;
- Diverter;
- Green stacker.

5.02 Monitoring

- **Surveillance will be in effect 24 hours, 7 days a week.**
- camera locations will be marked with signs regarding the use of cameras on the premises to notify individuals that their images may be captured by cameras.
- The surveillance will not be monitored on a continual basis but will only be viewed in the following circumstances:
 - cameras installed for operational or maintenance purposes, and the recordings thereof, will only be viewed for the maintenance and improvement of machine centers and will only be viewed by Authorized Personnel (see definitions); and
 - cameras installed for safety or security surveillance purposes, and the recordings thereof, will only be viewed in response to reported safety or security incidents and will only be viewed by a Manager, HR Manager, Site Privacy Officer, Committee member, or required third parties for example police or WSBC officers.
- Sound will not be recorded by the cameras.

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6 RETENTION, DESTRUCTION AND ACCESS

Where images are recorded, recordings shall be securely stored on the EDR HD-2H14 recorder. Recordings will be deleted automatically after 30 days unless needed for the purposes identified above. Recordings required for the purposes set out above will also be securely stored until such time as they are no longer necessary for such purposes. If Personal Information contained in a video recording is used to make a decision about an individual then the recording will be kept for a period of at least one year after the decision is made.

The Site Privacy Officer will ensure that personal information will be destroyed in such a manner as to ensure that no useable data is retrievable by any means.

Subject to the Personal Information Protection Act, an individual whose personal information has been captured by an electronic monitoring device has the right to access his or her personal information if requested.

Anyone can contact the Site Privacy Officer for more information about Tolko's video surveillance system and with requests for access to their Personal Information collected by Tolko.

7 DEFINITIONS

Authorized Personnel – are restricted to Tolko Heffley Creek Managers, Supervisors and personnel having responsibility for the maintenance and operational improvement of the machinery that is being monitored. Other Tolko personnel may be designated as Authorized Personnel by a Manager when an issue is identified for investigation.

8 RESPONSIBILITIES

| Job Role | Responsibilities |
|-----------------------------|--|
| Site Privacy Officer | <ul style="list-style-type: none">• Ensure the electronic monitoring and surveillance system functions as intended, is minimally intrusive on privacy, and that the components are repaired as necessary to maintain operation.• Suggest changes or additions as circumstances require.• Ensure that reception equipment and surveillance recordings (private data) are secure and only viewed as necessary by Authorized Personnel in accordance with this policy.• Dispose of recorded images in a manner that is secure and maintains privacy.• Maintain a list of cameras, their location, capabilities and purposes.• Serve as the contact person for Tolko for individuals with questions regarding Tolko's video surveillance system or who have requests for access to their Personal Information collected by Tolko. |
| Authorized Personnel | <ul style="list-style-type: none">• Keep confidential any recorded data they have reviewed and only discuss content on a 'need to know' basis with other Authorized Personnel. |
| Manager | <ul style="list-style-type: none">• Consult with the Local Union and Plant Committee about any changes or additions to installed systems.• Designate Authorized Personnel to directly use the electronic monitoring and surveillance system. |