

ARADIA FITNESS CORPORATE

POLICY MANUAL

Canada & United States

ESTABLISHED 2003 | LATEST UPDATE: MAY 2020

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Privacy 1.0

Aradia Fitness is sensitive to privacy issues on the Internet. We believe it is important you know how we treat the information we receive on the Internet about you.

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You. We use Your Personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

DEFINITIONS

For the purposes of this Privacy Policy: You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable. Company refers to Aradia Fitness. Affiliate: means an entity that controls, is controlled by or is under common control with a party, Control: means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority. Account: means a unique account created for You to access our Service or parts of our Service. Website: refers to Aradia Fitness, accessible from <http://www.aradiafitness.com>. Service: refers to the Website. Country: refers to: Canada, USA. Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. Third-party Social Media Service: refers to any website or any social network website through which a User can log in or create an account to use the Service. Personal Data: is any information that relates to an identified or identifiable individual. Cookies are small files that are placed on Your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses. Device means any device that can access the Service such as a computer, a cellphone, or a digital tablet. Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit)

Privacy 1.1

Collecting and Using Your Personal Data

While using Our Service, we may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally, identifiable information may include, but is not limited to: Email address, First name and last name, Phone number, Address, State, Province, ZIP/Postal code, City, Usage Data some Usage Data is collected automatically when using the Service. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device. Tracking Technologies and Cookies We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. To manage Your Account to manage Your registration as a user of the Service.

Privacy 1.2

The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user:

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items, or services You have purchased or of any other contract with Us through the Service.

To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information. To manage Your requests to attend and manage Your requests to Us.

Privacy 1.3

We may share your personal information in the following situations:

With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.

For Business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.

With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

With Business partners: We may share Your information with Our business partners to offer You certain products, services, or promotions.

With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

Privacy 1.4

Retention of Your Personal Data:

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data:

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer. The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

Privacy 1.5

Disclosure of Your Personal Data for Business Transactions:

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement:

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements:

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to: Comply with a legal obligation Protect and defend the rights or property of the Company, Prevent or investigate possible wrongdoing in connection with the Service, Protect the personal safety of Users of the Service or the public, Protect against legal liability.

Security of Your Personal Data:

The security of Your Personal Data is important to Us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, we cannot guarantee its absolute security. Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

Privacy 1.6

Overview:

Gathering Information

The personal information we collect is used only by us to respond to your inquiry. This increases our level of customer service and allows us to provide the information you requested in an efficient manner.

Links

Aradia Fitness website may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, Aradia Fitness is not responsible for the content or the privacy practices employed by other sites.

Cookies

A cookie is a tiny element of data that a Web site can send to your browser, which may then be stored on your hard drive for future recognition. You may set your browser to notify you when you receive a cookie.

Copyright Policy

The contents of the Aradia Fitness website are protected by applicable copyright laws. No permission is granted to copy, distribute, modify, post, or frame any text, graphics, video, audio, software code or user interface design or logos. Unauthorized use or exploitation of such marks and names is strictly prohibited. Unauthorized downloading, retransmission, storage in any medium, copying, redistribution, reproduction, or republication for any purpose is strictly prohibited.

Internet E-mail

E-mail over the Internet is not a secure medium and privacy cannot be assured. Aradia Fitness cannot assume any responsibility for any harm or damage you may experience or incur by sending personal or confidential information to Aradia Fitness over the Internet by E-mail, or if we send such information at your request.

Disclaimer of Liability

Aradia Fitness is not responsible in any way for any damages (direct, indirect, special, economic, or consequential) in respect of use of this Web site, any of its content or any Web browser.

Aradia Fitness follows the PIPEDA: Personal Information Protection and Electronic Documents Act.

Alcohol Drugs & Medications 2.0

Aradia Fitness is committed to promoting the health, safety and wellness of its employees, contractors, and the public. Aradia Fitness recognizes and accepts the responsibility to provide Workers with a safe, healthy, and productive work environment. Workers have the responsibility to report to work capable of performing their tasks productively and safely (i.e., mentally, and physically fit to perform assigned tasks). Impairment from Drugs, whether legal or illegal, Alcohol and Medications can have serious adverse impact on the workplace.

Aradia Fitness Inc. has established this Policy to balance our respect for individuals with the need to maintain an impairment-free work environment.

These policies apply to all employees, [contractors and subcontractors] (hereinafter collectively referred to as the “Workers”).

Alcohol Drugs & Medications 2.1

Responsibilities of the Worker

- Share responsibility for maintaining a safe and productive Alcohol and Drug free workplace.
- Required to perform their job safely and in strict compliance with all applicable rules, policies, and procedures.
- Read, understand, and fully comply with this Policy. Any questions on policy details, interpretation or implementation are to be referred to Aradia Fitness Corporate offices.
- Report for work Fit for Duty and remain Fit for Duty while on Company business.
- Immediately advise the studio owner of any worker suspected to be not Fit for Duty.
- Take appropriate action to minimize any safety risk and advise his/her studio owner accordingly.

Responsibilities of the Employer

- Observe Worker performance and document any negative changes or problems.
- Confidentially provide guidance to those employees/contractors who seek assistance for a personal problem

Alcohol Drugs & Medications 2.2

Aradia Fitness Standards

To minimize the risk of unsafe performance due to impairment from alcohol, prescription or over the counter medication, or other drugs, whether legal or illegal and substances, all Workers are required to adhere to the following standards.

A. Alcohol

The following are strictly prohibited while at an Aradia Fitness property, operating Aradia Fitness

equipment, during Aradia Fitness working hours, at Aradia Fitness sponsored events, and whenever a Worker is representing Aradia Fitness or conducting Aradia Fitness business:

- Reporting for duty or remaining on duty while being under the influence of Alcohol
- Consuming Alcohol during the workday including meals or other breaks
- Possessing, distributing, offering, or selling Alcoholic beverages

On an exceptional basis for Aradia Fitness-sponsored social events, Alcohol may be served on Aradia Fitness premises or outside of the Aradia Fitness premises with the explicit approval of the Aradia Fitness Studio Owner (eg. Christmas Party). Aradia Fitness Corporate approval will be required for promotional events. Workers who are permitted to consume Alcohol on such occasions are required to exercise moderation and good judgment, and to avoid operating a motor vehicle with a blood Alcohol level above the legal standard.

B. Medications

All Workers are expected to use prescribed and over-the-counter medications responsibly.

The intentional misuse of medications (for example, using the medication other than as prescribed, using someone else's prescribed medication, or combining medication and Alcohol use against

direction) while on Aradia Fitness property, operating a Aradia Fitness vehicle or equipment, during working hours, at Aradia Fitness sponsored events, and whenever a Worker is representing Aradia Fitness or conducting Aradia Fitness business, is prohibited.

Furthermore, Workers are required to investigate through their doctor or pharmacist whether a medication can affect safe operation and take appropriate steps to minimize associated risk and to advise their Manager or Supervisor consequently.

Alcohol Drugs & Medications 2.3

C. Drugs and other Substances

The following are strictly prohibited while on Aradia Fitness property, operating a Aradia Fitness vehicle or equipment, during working hours, at Aradia Fitness sponsored events, and whenever a Worker is representing Aradia Fitness or conducting Aradia Fitness business:

- Reporting for duty or remaining on duty while being under the influence of any Drugs, whether legal or illegal.
- Consuming legal or illegal Drugs during the workday including meals or other breaks.
- Possessing, distributing, offering or selling Drugs, whether legal or illegal.

Prevention and Investigation Procedures

A. Investigation

The Company will investigate any suspected or confirmed violation of this Policy. A Worker may be held out of service with or without pay, depending on the circumstances, while the investigation is being conducted.

The Company reserves the right to investigate any situation where there are reasonable grounds to believe that Alcohol or Illegal Drugs are present on Company Premises or that other misconduct has occurred.

B. Alcohol and Drug Testing

Drug and Alcohol testing will only be required if there are reasonable grounds for testing, or if there has been an accident or Near Miss or Significant Incident affecting persons and/or property damage.

If a prescription drug is required by a physician or medical professional that may have the potential for impairment, drowsiness or reduced alertness, the Worker must immediately report this to their supervisor or manager. The supervisor or manager must take appropriate steps to ensure that the Worker and the workplace are safe.

Alcohol Drugs & Medications 2.4

Reasonable Grounds for Testing

Testing for the presence of Drugs and Alcohols when an Aradia Fitness studio owner suspects a worker is unfit for duty due to impairment can be required of the Worker in the circumstance of reasonable grounds. Reasonable grounds include, but are not limited to, information established by the observation of the Worker's conduct and/or other indicators, such as the physical appearance of the Worker, his or her attendance record, speech, behavior, and/or body odors which suggest the Worker, is under the influence of a substance prohibit by this policy (including withdrawal symptoms).

The Worker will not be permitted to return to work until verified negative test results have been received. If the Worker refuses to comply it will be considered misconduct and a violation of this policy. Any individual failing to cooperate with reasonable suspicion testing may be subject to discipline, up to and including termination of employment.

Post-Accident/Post-Incident Testing

Testing may be conducted following an accident, or following an incident at the workplace where safety precautions were violated and/or careless acts were performed which resulted in, or substantially increased the risk of, injury or harm to any person or damage to property or the physical environment. As soon as possible, following an accident or incident, the Worker shall submit to tests for substances prohibited by this policy, unless there is clear evidence that the accident and/or incident could not have been contributed by the Worker, but by an unsafe condition (i.e., structural or mechanical failure which the Worker could not have foreseen or prevented.)

Policy Violations

Aradia Fitness may discipline or terminate the employment of a Worker who fails to comply with the drug and alcohol policy, including failure to report for a test, delaying testing, or refusing to submit to a test. The appropriate consequences depend on the facts of the case, including the nature of the violation, the existence of prior violations, the response to prior corrective assistance programs, and the seriousness of the violation and applicable laws.

Alcohol Drugs & Medications 2.5

Definitions

Alcohol

The intoxicating agent in beverage Alcohol, ethyl Alcohol, or other low molecular weight Alcohols including methyl and isopropyl. It includes but is not limited to beer, wine, and distilled spirits.

Alcohol and Drug Test

A test administered using technologies such as oral fluids, urine testing and hair samples analyzed by qualified personnel; in the case of urine laboratory test, samples are analyzed by an approved laboratory.

Company Business

Refers to all business activities undertaken by Workers while performing duties, whether conducted on or off Company premises.

Company Premises

Includes but is not necessarily restricted to all land, facilities, mobile equipment, and vehicles owned, leased, or otherwise directly controlled by the Company.

Drug

Any substance which may, depending on the context, include alcohol, legal drugs, Illegal Drugs or medications, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts. For the purposes of this Policy, drugs of concern are those that inhibit a worker's ability to perform his or her job safely

Worker

Any person engaged in work at the workplace and includes contractors and subcontractors.

Fit for Duty

Means that a worker can safely perform assigned duties without any limitations resulting from, but not limited to the use or after-effects of Illegal Drugs, Alcohol, and/or medications.

Medication

Refers to a Drug obtained legally, either over the counter or through a doctor's prescription.

Reasonable Grounds

Includes objective information established by observations of a Worker's conduct or other indicators such as physical appearance, attendance record, circumstances surrounding accidents or near misses in the workplace, presence of Alcohol, Drugs and Drug paraphernalia in the vicinity of the Worker or an area where the Worker works.

Harassment 3.0

Aradia Fitness is committed to fostering a harassment-free workplace where all employees are treated with respect and dignity.

Harassment at Aradia Fitness studios is not tolerated. Workers who are found to have harassed another individual may be subject to disciplinary action. This includes any employee/contractor who: interferes with the resolution of a harassment complaint; retaliates against an individual for filing a harassment complaint; or files an unfounded harassment complaint intended to cause harm.

This policy applies to all current employees of Aradia Fitness/or partnering affiliates including full and part-time, casual, contract, permanent and temporary employees. This policy also applies to job applicants.

This policy applies to all behavior that is in some way connected to work, including during off-site meetings, training and on business trips.

Definitions

Harassment:

- offending or humiliating someone physically or verbally.
- threatening or intimidating someone; or
- making unwelcome jokes or comments about someone's race, national or ethnic origin, color, religion, age, sex, sexual orientation, marital status, family status, disability, or pardoned conviction.

Sexual harassment

- offensive or humiliating behavior that is related to a person's sex.
- behavior of a sexual nature that creates an intimidating, unwelcome, hostile or offensive work environment
- behavior of a sexual nature that could reasonably be thought to put sexual conditions on a person's job or employment opportunities.

Harassment 3.1

Responsibilities and Expectations

Aradia Fitness studio owner is responsible for:

- providing all employees/contractors with a harassment-free workplace.
- ensuring that this policy is applied in a timely, consistent, and confidential manner.
- determining whether allegations of harassment are substantiated.
- determining what corrective action is appropriate where a harassment complaint has been substantiated.
- the administration of this policy
- reviewing this policy annually, and reporting to corporate if changes are required

Aradia Fitness studio owners are also responsible for:

- fostering a harassment-free work environment and setting an example about appropriate workplace behavior.
- communicating the process for investigating and resolving harassment complaints made by employees/contractors
- dealing with harassment situations immediately upon becoming aware of them, whether a harassment complaint has been made.
- taking appropriate action during a harassment investigation, including separating the parties to the harassment complaint, and involving corporate
- ensuring harassment situations are dealt with in a sensitive and confidential manner.

Harassment 3.2

Responsibilities and Expectations

Employees/contractors are responsible for:

- treating others with respect in the workplace.
- reporting harassment to Aradia Fitness studio owner
- cooperating with a harassment investigation and respecting the confidentiality related to the investigation process.

Employees/contractors can expect:

- to be treated with respect in the workplace.
- that reported harassment will be dealt with in a timely, confidential and effective manner.
- to have their rights to a fair process and to confidentiality respected during a harassment investigation
- to be protected against retaliation for reporting harassment or cooperating with a harassment investigation.

Harassment 3.3

Procedures for Addressing a Harassment Complaint

Filing a Complaint

An employee/contractor may file a harassment complaint by contacting the Aradia Fitness studio owner or Aradia Fitness Corporate. The complaint must be in writing. The employee should be prepared to provide details such as what happened, when it happened, where it happened, how often and who else was present.

Complaints should be made as soon as possible but no later than within one year of the last incident of perceived harassment, unless there are circumstances that prevented the employee from doing so.

The Aradia Fitness studio owner will tell the person that the harassment complaint has been made against, in writing, that a harassment complaint has been filed. The letter will also provide details of the allegations that have been made against him or her.

The Aradia Fitness studio owner is also responsible to communicate the complaint to Aradia Corporate. Every effort will be made to resolve harassment complaints within 15 working days.

The Aradia Fitness studio owner will advise both parties of the reasons why, if this is not possible. If either party to a harassment complaint believes that the complaint is not being handled in accordance with this policy, he or she should contact Aradia Fitness Corporate

Harassment 3.4

Procedures for Addressing a Harassment Complaint

Mediation

Wherever appropriate and possible, the parties to the harassment complaint will be offered mediation prior to proceeding with a harassment investigation. Mediation is voluntary and confidential. It is intended to assist the parties to arrive at a mutually acceptable resolution to the harassment complaint.

The mediator will be a neutral person, agreed upon by both parties. The mediator will not be involved in investigating the complaint. Each party to the complaint has the right to be accompanied and assisted during mediation sessions by a person of their choosing.

Investigation

If mediation is inappropriate or does not resolve the issue, a harassment investigation will be conducted. All investigations will be handled by an individual who has the necessary training and experience. In some cases, Aradia Corporate may be engaged for this purpose.

The investigator will interview the person who made the complaint, the person the complaint was made against and any witnesses that have been identified. All people who are interviewed will have the right to review their statement, as recorded by the investigator, to ensure its accuracy.

All documentation will be submitted to Aradia Fitness Corporate. Both parties to the complaint will be given a copy.

Harassment 3.5

Procedures for Addressing a Harassment Complaint

Substantiated Complaint

If a harassment complaint is substantiated, the Aradia Fitness studio owner and Aradia Corporate will decide what action is appropriate. If there is a dispute between the studio owner and corporate to the appropriate action, Aradia Corporate will determine the correct action to be taken.

Remedies for the employee who was harassed may include: an oral or written apology; compensation for lost wages; compensation for any lost employment benefits such as sick leave; and compensation for hurt feelings.

Corrective action for the employee found to have engaged in harassment may include: a reprimand; a suspension; a transfer; a demotion; and/or dismissal. Both parties to the complaint will be advised, in writing, of the decision.

Privacy and Confidentiality

All parties to a harassment complaint are expected to respect the privacy and confidentiality of all other parties involved and to limit the discussion of a harassment complaint to those that need to know. Aradia Fitness and all individuals involved in the harassment complaint process.

Review

Aradia Fitness Corporate will review this policy and procedures on an annual basis, or as required, and will make necessary adjustments to ensure that it meets the needs of all employees.

Violence 4.0

Aradia Fitness has zero tolerance for workplace violence or harassment of any kind and will be proactive in the prevention of workplace violence and harassment.

Aradia Fitness is committed to:

- Investigating reported incidents of violence and harassment in an objective and timely manner
- Taking necessary action
- Providing appropriate support for victims

The purpose of this policy is to ensure that employees/contractors at Aradia Fitness have a work environment that is free of violence or harassment of any kind, whether it arises from another employee or any other person visiting the workplace or interacting with staff.

This policy will ensure that:

- Individuals are aware of, and understand that, acts of violence or harassment are considered a serious offense for which necessary action will be imposed
- Those subjected to acts of violence or harassment are encouraged to access any assistance they may require pursuing a complaint
- Individuals are advised of available recourse if they are subjected to, or become aware of, situations involving violence or harassment.

Violence 4.1

Definitions

Workplace harassment

- Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known, or ought reasonably to be known, to be unwelcome.
- Includes unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating, or demeaning to a worker or group of workers.
- Includes behavior that intimidates, isolates, or discriminates against the targeted individual.

Workplace violence

- The exercise or attempt of physical force by a person against a worker in a workplace that causes or could cause physical injury to the worker
- A threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker

Types of workplace violence will be defined as:

Criminal Intent

Involves a person with no relationship to the workplace, who commits a violent act (e.g. theft, hostage taking/kidnapping, physical assault), such as a Customer/Client with willful intent to cause harm to the employee

Employee Related

Involves an employee/contractor who engages in repeated and persistent negative acts towards one or more employees/contractors resulting in the creation of a toxic or unhealthy work environment

Personal Relationship

Involves violence that occurs at the workplace (e.g. family member that commits a violent act against a worker within the workplace)

If any employee engages in workplace violence or harassment, an investigation will take place immediately. The employee involved will face discipline which may include up to and including immediate termination.

Violence 4.2

Responsibilities

Aradia Fitness studio owner is responsible for:

- All reasonable preventative measures to protect employees and others at Aradia Fitness from workplace violence and harassment
- Establish procedures, policies, and work environment arrangements to eliminate the risk to employees/contractors from violence.
- Proper maintenance and testing of all security systems including, but not limited to, surveillance cameras, lighting, panic button, intercom, etc.
- Review the policy annually and report and revisions required to Aradia Fitness Corporate
- Reporting procedures are established with respect to workplace violence and harassment. Aradia Fitness studio owner is expected to report any incidents to Aradia Fitness Corporate within 48hrs of incident
- Process is in place for responding to, and investigating incidents of workplace violence and harassment
- This policy and procedure are posted and communicated to all staff.
- This policy is properly enforced and communicated to the employees/contractors
- Encourage employees/contractors to report complaints or incidents of
- workplace violence and harassment
- All reports/complaints/incidents of workplace violence and/or harassment will be addressed in an appropriate and timely manner
- All complaints or incidents of workplace violence and/or harassment will be reported promptly to the Aradia Fitness studio owner, and Aradia Fitness Corporate and investigated immediately.

Employees are responsible for:

- Always comply with this policy and all related procedures for their own protection and the protection of others within the workplace
- Immediately report any violent or potentially violent incident to the Aradia Fitness Studio owner
- In the event of an extreme or imminent threat of physical harm to themselves, the worker should contact Emergency Services
- Fully cooperate in any investigation of complaints or incidents of workplace violence or harassment as indicated within this policy.

Violence 4.3

Zero Tolerance

Aradia Fitness will not tolerate any incidents of workplace violence or harassment perpetrated against or by any employee, customer, vendor, contractor, visitor, or any other person within Aradia Fitness.

- With respect to workplace violence and harassment as defined by this policy, any contravention may result in the following:
- Removal from the property
- Discipline or dismissal
- Police involvement.
- All physical assaults involving an employee or occurring at Aradia Fitness will be reported to the police.
- Threats of physical violence will be reported to the authorities, as appropriate

Response to a Violent or Harassment event or complaint

Any employee who observes workplace violence or harassment, or is a victim thereof, shall immediately go to a safe location and report it to the Aradia Fitness studio owner or Aradia Fitness Corporate. At the discretion of management, the police may need to be contacted. If the Aradia Fitness studio manager/Aradia corporate is not available, staff shall contact the police if they feel it is necessary.

All complaints and incidents are to be recorded in writing by the reporting person to the Aradia Fitness studio owner. The Aradia Fitness studio owners is responsible for contacting corporate and providing the written statement of the incident.

Aradia Fitness studio manager and Aradia Fitness Corporate will promptly carry out an investigation. All reports will be investigated, and information will be kept confidential, to the extent possible. The results of the investigation will be communicated to the complainant and the accused as soon as possible, but no later than 2 weeks from the time the complaint was made.

Violence 4.4

Response to a Violent or Harassment event or complaint

Aradia Fitness studio owners will be following the process:

- A documented interview with the complainant and/or victim.
- A documented interview with the alleged perpetrator(s)
- A documented interview with any witnesses with relevant information to provide
- Any other step the investigator(s) deems relevant to the investigation of the complaint or incident.
- At the conclusion of the investigation of a complaint or incident, the Aradia Fitness studio owner will provide a written report of the findings and provide any recommendations to prevent a recurrence, to Aradia Fitness Corporate
- Following the investigation, the appropriate corrective action will be determined by the Aradia Fitness Corporate and the Aradia Fitness studio owner of the employee(s) involved.
- However, if it is determined that a false accusation has been made in bad faith, appropriate measures will be taken.
- External Reporting may be required in some situations. The police may also need to be contacted (if they have not been contacted already) if the conclusion of the investigation involves crimes that fall under the Criminal Code.

Signs of a Potentially Violent Person

Identifying a potentially Violent person Signs that a person is potentially violent may include, but are not limited to:

- Their face is turning red or white.
- Their expression is angry, sneering, or glaring.
- They are pacing, making nervous, repetitive, or violent movements, shaking, clenching jaw or fists, approaching too near, or perspiring heavily.
- They are using a loud voice and/or abusive language.
- Their breathing is shallow or rapid.
- If you notice these signs, TAKE ACTION. Get help immediately!

Violence 4.5

Communicating with a potentially Violent person:

- DO NOT confront the person by glaring or staring
- Remain calm and use a calm manner
- Speak slowly and clearly in a sure tone
- DO NOT attempt complicated explanations during a tense situation
- Ask the person to talk and pay close attention
- DO NOT advise the person to relax or be calm
- Use silence to placate the person
- DO NOT defy, criticize, insult, interrupt or patronize
- DO NOT crowd the person. Allow them about 2 to 4 feet of space
- DO NOT fight with the person. Leave the situation and if necessary, get help from the police

Problem solving with a potentially Violent person:

- Try to see the situation from the person's point of view to figure out how to fix the problem
- DO NOT take the situation lightly
- Direct the person's attention to the issue
- Ask the person how to fix the problem
- Be positive about criticism. If you agree with it, admit this. If you disagree, try to discuss the situation
- DO NOT lie or make unreasonable commitments
- Make minor requests, such as taking the discussion to a quiet area
- Divide the problem into smaller chunks and deal with them one at a time
- Be clear about the consequences of violence and provide other options.
- If the person is an employee, do not discuss discipline until the situation is more stable
- DO NOT immediately turn down the person's request
- DO NOT try to negotiate with someone who is making threats. End the conversation calmly and if necessary, get assistance

Ending an abusive Telephone call:

- Interrupt in a courteous but firm tone.
- Make it clear that abusive behavior is not acceptable, and that you will end the conversation if they do not stop.
- Halt the call in a courteous but firm tone if the abusive person calls again.
- Put the caller on hold.
- Ask if they would like to speak to your supervisor, sometimes another person maybe able to de-escalate the issue

Violence 4.6

In the Event of a Robbery

- Stay calm.
- Do not argue
- Listen.
- Do not follow or attempt to capture the thief if this places you and others in great danger
- Do not surprise the thief or move unexpectedly
- Try to be observant and remember details:
 - What is he/she wearing;
 - What does he or she look like?
 - How tall are they; What colour hair does he or she have;
 - Does he or she have any unusual characteristics such as tattoos or piercings
 - If he or she had a weapon, describe it
- After he or she leaves, try to avoid touching anything the thief has touched. Make a note of the items that were touched.
- After a Robbery If you can do so safely, record the license plate and the make and model of the vehicle the thief used, NEVER try to chase the thief
- Notify police immediately by calling 911 and provide them with as much information as possible including the route the thief took when leaving (remember not to try to follow the thief), record all information observed about the thief
- Lock all doors and do not let anyone enter after an incident and ask all witnesses to remain until police arrive contact the Aradia Fitness studio owner, and do not discuss the robbery with media or bystanders, cooperate fully with the police investigation.

Review

Aradia Fitness Corporate will review this policy and procedures on an annual basis, or as required, and will make necessary adjustments to ensure that it meets the needs of all employees.

Social Media 5.0

Over the last decade, the role of social media in business day-to-day operations has continued to grow in importance. Aradia Fitness recognizes that social media plays a large role in the day-to-day operations of Aradia Fitness studios & affiliated studios.

All persons involved in the Aradia Fitness business (owners & workers) need to be aware that all posts made to social media platforms ultimately reflect the Aradia Fitness Brand. The following policies applies to any official Aradia Fitness Franchise or License page, Powered by Aradia License page, as well as any personal page that makes reference to Aradia:

- Social media posts published by any franchisees or licensees are always to be professional. This means no foul language, no inappropriate pictures, trolling, fighting, etc. To be clear: No Aradia franchisee, licensee or instructor is to engage or encourage on-line 'fighting' or 'trolling' with any competing business or customer at any time
- Content pertaining to sensitive company information should not be shared on any social media platform, to include private messages. Divulging information related to internal operations, is unprofessional. If there are issues that you would like addressed, please proceed through the proper channels, and encourage others to as well
- Respect the privacy of your co-workers
- Remember that everything that you post is permanent
- Be Mindful that you are representing the company. The mission and values at Aradia Fitness are clear and should align with the social media conduct by instructors. Your personal posts can affect all companies you are employed by, especially if you are socially connected to other coworkers or clients

Social Media 5.1

- Be kind, have fun and connect. Keep in mind that there are humans, with their own personal experiences, on the receiving end of your words
- Honor Our Differences: Live the values. Aradia Fitness will not tolerate discrimination (including age, sex, race, color, creed, religion, ethnicity, sexual orientation, gender identity, national origin, citizenship, disability, or marital status or any other legally recognized protected basis under federal, state, or local laws, regulations or ordinances)
- As an Aradia Fitness studio owner, instructor, or other type of worker, you are representing not only your studio... but also every Aradia Fitness studio in North America
- Before making a social media post, ask yourself questions like:
 - Does this post add value?
 - Does this post represent the Aradia Fitness brand in a positive manner?
 - Will anyone be offended by this post?
 - Do I have permission or rights to post a photo or video of someone else?
- Proper copyright and reference laws should be observed when posting online. Any photographers, musicians, etc. should be properly credited when applicable
- Social media pages for business are to be used to business purposes, promotion of classes and communication to students or staff only
- Accountability and transparency are important to Aradia Fitness and as a company we will address any conduct that we feel does not align with our values
- Use disclaimers when posting an opinion on your personal page. If you do not want your employer(s) to be aware of your personal opinions on your personal page, ensure that it is private

Social Media 5.2

If Aradia Fitness at any time that the conduct on social media is unprofessional, they will invoke the necessary channels to address the situation in a timely manner as they see acceptable. Access to social media is a privilege.

It is the responsibility of studio owners to monitor & take action on any violations within their studio. Any franchisees or licensees found to be in violation of this policy will be subject to the following disciplinary actions:

- *First Offense:* The franchisee will be sent a formal notification detailing the violation
- *Subsequent Offense:* The franchisee will be fined \$500 by either Aradia Fitness Canada or Aradia Fitness USA (depending on the jurisdiction the studio is in)
- *Repeat Offenses:* If a franchisee or licensee continues to violate social media policies, misrepresent or damage the Aradia Fitness brand, she/he can face legal action, inflated fines and/or revocation of their Aradia Fitness operational rights. Actions against repeat offenders will be determined on a case-by-case basis.

We are holding all persons at Aradia Fitness to these standards. If you see a violation of these policies, contact your supervisor or corporate immediately,

Hazardous Materials 6.0

Aradia Fitness has limited hazardous products onsite within studio spaces. Due to the variability between sites we require that Aradia Fitness studio owners be aware of all the products that they have within their facilities. The Aradia Fitness studio owners are responsible ensuring that WHMIS or OSHA training is provided for their staff if required due to the cleaning products they are using, and that SDS sheets are available for the staff.

CANADA: WHIMS for Employers

WHMIS in Canada is a combination of federal, provincial, and territorial legislation. The federal components are the Hazardous Products Act and the Controlled Products Regulations. When people talk about employers having a requirement to educate their workers on WHMIS, they are talking about educating them on the information from the federal act and regulations.

This ensures that the WHMIS symbols, classifications of hazards, and labelling for WHMIS are the same for Alberta WHMIS as they would be for any other province or territory making the WHMIS course materials standard across Canada when it comes to the information workers need to know from the WHMIS legislation. This national consistency is an important part of the Canadian WHMIS program.

In Alberta and the other provinces and territories, there is also local legislation and regulation for the implementation and enforcement of WHMIS. In Alberta this is covered in the Occupational Health and Safety Act and the Occupational Health and Safety Code, Part 29.

Hazardous Materials 6.1

CANADA: WHMIS for Employers

As an employer, do I need to educate and train my employees on WHMIS?

The simple answer to this question is Yes, it is a requirement for employers to educate their workers on WHMIS, where controlled products are present in the workplace. This includes education on what WHMIS is, the classifications of hazards, labelling and how to read a Safety Data Sheet (SDS) and is often referred to as "Generic WHMIS" because it would be the same training materials for any workplace regardless of the products used in the workplace and regardless of the types of hazards from these products. The employer has a second part to this responsibility and that is to provide more product specific or site specific training on the products and hazards that are applicable to the work that employee is performing and the products they would handle or be in contact with. The Alberta WHMIS requirements specifically address the need for employers to provide Generic WHMIS Education and worksite specific WHMIS training.

How frequently do I need to train my workers on WHMIS in Alberta?

This is the question that can have a different answer from province to province and territory. It is the regulatory authority in each province or territory that sets the answer to this question. In Alberta employers who have controlled products in the workplace or workers exposed to controlled products must have a WHMIS program in place – the WHMIS law does not specify how frequently employers must provide education to their employees – instead, the law provides a standard for the effectiveness of the training and requires that the standard be achieved on an ongoing basis. To decide if this standard has been achieved an employer may use a WHMIS testing process and or use job observations to assess or measure the effectiveness of their WHMIS education and training programs.

Hazardous Materials 6.2

CANADA: WHMIS for Employers

Do I need to have a WHMIS Certificate for my employees?

Alberta WHMIS laws do not currently require employers to issue a certificate to their employees. A WHMIS Certificate or WHMIS Card can be issued by the person or organization which provides WHMIS education, training, and testing. While Alberta WHMIS laws do not require that a WHMIS certificate is issued. It is becoming common that workers from one organization are off site on other organizations work sites. In this case where you have workers on my job site, I can require you to show some form of proof that your employees have had “Generic WHMIS education and training”. Having a WHMIS Card or Certificate is a common way that contract workers or workers who work off site can provide documentation for their training.

WHMIS certificates typically include the person’s name, company employed by, a testing or training date and a test score if applicable. Most importantly is information on who issued the WHMIS certificate as a way for to assess the components of, credibility of the training, or verify the course completion details.

When you have questions about local WHMIS requirements you can contact the jurisdiction that regulates WHMIS for Alberta. More information is available at this link on the Alberta Human Services site:

<http://work.alberta.ca/occupational-health-safety.html>

Hazardous Materials 6.3

UNITED STATES: OSHA for Employers

Under the OSHA law, employers have a responsibility to provide a safe workplace. This is a short summary of key employer responsibilities:

- Provide a workplace free from serious recognized hazards and comply with standards, rules and regulations issued under the OSH Act.
- Examine workplace conditions to make sure they conform to applicable OSHA standards.
- Make sure employees have and use safe tools and equipment and properly maintain this equipment.
- Use color codes, posters, labels or signs to warn employees of potential hazards.
- Establish or update operating procedures and communicate them so that employees follow safety and health requirements.
- Employers must provide safety training in a language and vocabulary workers can understand.
- Employers with hazardous chemicals in the workplace must develop and implement a written hazard communication program and train employees on the hazards they are exposed to and proper precautions (and a copy of safety data sheets must be readily available). See the OSHA page on Hazard Communication. Provide medical examinations and training when required by OSHA standards.
- Post, at a prominent location within the workplace, the OSHA poster (or the state-plan equivalent) informing employees of their rights and responsibilities.
- Report to the nearest OSHA office all work-related fatalities within 8 hours, and all work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours. Call our toll-free number: 1-800-321-OSHA (6742); TTY 1-877-889-5627. [Employers under federal OSHA's jurisdiction were required to begin reporting by Jan. 1, 2015. Establishments in a state with a state-run OSHA program should contact their state plan for the implementation date].
- Keep records of work-related injuries and illnesses. (Note: Employers with 10 or fewer employees and employers in certain low-hazard industries are exempt from this requirement.

Hazardous Materials 6.4

UNITED STATES: OSHA for Employers

Continued summary of key employer responsibilities:

- Provide employees, former employees and their representatives access to the Log of Work-Related Injuries and Illnesses (OSHA Form 300). On February 1, and for three months, covered employers must post the summary of the OSHA log of injuries and illnesses (OSHA Form 300A).
- Provide access to employee medical records and exposure records to employees or their authorized representatives. Provide to the OSHA compliance officer the names of authorized employee representatives who may be asked to accompany the compliance officer during an inspection.
- Not discriminate against employees who exercise their rights under the Act. See our "Whistleblower Protection" webpage.
- Post OSHA citations at or near the work area involved. Each citation must remain posted until the violation has been corrected, or for three working days, whichever is longer. Post abatement verification documents or tags.
- Correct cited violations by the deadline set in the OSHA citation and submit required abatement verification documentation.
- OSHA encourages all employers to adopt a safety and health program. Safety and health programs, known by a variety of names, are universal interventions that can substantially reduce the number and severity of workplace injuries and alleviate the associated financial burdens on U.S. workplaces. Many states have requirements or voluntary guidelines for workplace safety and health programs. Also, numerous employers in the United States already manage safety using safety and health programs, and we believe that all employers can and should do the same. Most successful safety and health programs are based on a common set of key elements. These include management leadership, worker participation, and a systematic approach to finding and fixing hazards. OSHA's Safe and Sound page contains more information.

For more detailed information or to contact someone from OSHA, please visit:

<https://osha.gov>

Music Licensing 7.0

All Aradia Fitness studio owners must obtain music licensing rights for each of their physical studio locations. The use of music in the studio for classes must be covered under a “right to use” license from each of the organizations in that studio’s country. For music used for online classes or social media posts, a separate license may be required for online usage.

Obtaining and maintain music licensing rights is imperative as a business owner. Aradia Fitness studio owners must send a copy of their annual renewal to the head of their country’s corporate office. Failure to do so will result first in a fine and can result in further legal action or loss of business rights.

Why must you obtain music licensing rights?

The use of music is controlled by the rights holders of the music. This includes everyone from the singer & songwriter, to the musicians and producers. When you use a song that you have purchased on iTunes or stream from Spotify, you obtain only the rights to use the song for personal use.

When music is used for fitness classes, background music in a bar or grocery store (or any other purpose that is essential to the environment of a business) the music is longer being utilized for personal use. This then becomes “public use” or falls under the scope of “broadcasting”. Such use applies both to physical “in person” use of the music as well as use online.

Keep in mind – the license rights typically apply to specific physical locations only. If you have multiple studios, you may have to obtain a license for each location. If you have a showcase or special event off-site, you will most likely need to obtain a special licensing agreement just for the use of music at that event.

Music Licensing 7.1

Why must I obtain music licensing rights from multiple organizations?

A single song is brought to existence by the cooperative efforts of many individuals – the singer, the songwriter, the various individual musicians, the producer, and more.

Each individual involved in making music is represented by a copyright watchdog of their choosing (aka the music licensing company). The role of music licensing companies is to ensure their clients receive the royalty fees that are owed to them by the sale & use of their intellectual property.

Because of this, a single song can involve individuals represented by different music licensing organizations. Simply obtain a music license from one organization may not fully protect you from copyright infringement for use of the song.

How much do music licensing rights cost?

Pricing varies between the different organizations and covers the use of music for one (1) year. Some organizations have a blanket rate based on the type of business. Other organizations base their right off of the business size or number of members.

Rates can range anywhere from \$100 - \$500 per year, per organization. Some music licensing companies offer payment plans by request or they may require the full amount due at the time of renewal each year.

There are four organizations in Canada

1. CONNECT Music Licensing
(connectmusic.ca)
2. Socan Music (socan.ca)
3. ReSound (resound.ca)
4. CSI (cmrra.ca | sodrac.ca)

There are three organizations in the US

1. BMI (<https://bmi.com>)
2. ASCAP (<https://ascap.com>)
3. SESAC (<https://sesac.com>)

Corporate Contact Information

Please direct any questions, concerns or comments to your direct line of supervision.

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