

## GPS Tracking Policy



### Purpose

C&C Wind Energy Services is dedicated to the protection of its assets, both physical and intellectual. The Use of Global Positioning System (GPS) tracking on company owned or leased property allows the achievement of this important aspect of company security and personnel safety.

### Scope

This policy applies to all employees of C&C Wind Energy Services in the US and Canada who are responsible for the operation, or otherwise utilize, company owned (or leased) vehicles, trailers, or other equipment. Additionally, management who is responsible for the monitoring of each piece of equipment shall adhere to this document.

### Policy

#### GPS Monitoring

- Monitoring of employees will be limited in reason of legitimate business purposes
- GPS units are capable of collecting and storing data pertaining to the following
  - Vehicle Speed
  - Location
  - Vehicle Status
  - Operating Habits (Regarding speeding, acceleration, and braking, idling, etc.)
- Employees will be notified when there is a GPS unit installed in any vehicle or other piece of equipment
- Monitoring by management is intermittent, although ongoing, and all employees should expect that C&C Wind Energy Services is aware of their geographical location during times that the employees are operating a company vehicle or piece of equipment.

### Responsibilities

#### Employees

- The removal of a GPS unit, or otherwise rendering one inoperative, from any vehicle or piece of equipment, by any employee unauthorized to do such, is strictly prohibited.
- If an employee is observed to be, or has been, engaging in the dereliction of duties, or other unapproved activities with company vehicles or equipment, each employee is subject to disciplinary progression, up to and including termination.

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- If employees have questions concerning the placement, use, monitoring, or other, they are directed to contact their immediate supervisor for clarification.
- For each employee who is assigned a vehicle, they must also receive a GPS unit to place in the vehicle. If one is not received, employee is responsible for notifying management so appropriate arrangements can be made.

### Management

- If GPS Data is observed to be contrary to an employee's authorized route or activities, management reserves the right to investigate with regards to a potential violation of company policy
- C&C Wind Energy Services will maintain all information obtained through the use of GPS devices as confidential, unless required to disclose such information as part of an official investigation.
- C&C Wind Energy Services will not contravene the privacy rights of employees as outlined in federal data protection acts (and/or Personal Information Protection and Electronic Documents Act (PIPEDA))