

THE BPA FINANCIAL GROUP

ELECTRONIC ACCESS POLICY

FOR ALL BPA EMPLOYEES



JULY 19, 2010



BPA FINANCIAL GROUP ELECTRONIC ACCESS POLICY

POLICY AND PURPOSE

Benefit Plan Administrators Limited and Benefit Plan Administrators (Atlantic) Limited (collectively referred to as “BPA”) are a Third Party Administrators specializing in the administration of Trusteed multi-employer benefit plans. In the course of operating business, BPA provides some if not all employees with electronic access consisting of an e-mail system, a network connection, and Internet/Intranet access. This policy governs all use of BPA’s network, Internet/Intranet access, and e-mail systems, at all Company locations and offices.

INTERNET ACCEPTABLE USAGE

BPA recognizes the business need for some, if not all of its employees to have access to the Internet while on the job using Company computers. As such, BPA has made the business decision to make the Internet available to employees for Company business purposes. Brief and occasional personal use of the Company e-mail system or the Internet is acceptable as long as it is not excessive or inappropriate, occurs during personal time (lunch or other breaks), and does not result in expense to the Company. Use is defined as “excessive” if it interferes with normal job performance or productivity, an employee’s responsiveness, the activities of coworkers, or if it consumes significant Company resources.

BPA specifically prohibits its employees from accessing the following types of sites using Company computers:

1. Gambling sites
2. Auction sites
3. Hate sites
4. Pornographic sites
5. Streaming media sites (includes entertainment sites)
6. Any site engaging in or encouraging illegal activity

BPA reserves the right to use monitoring software to make sure the Company’s Electronic Access Policy is being adhered to by its employees. The Company may record and/or monitor one or more employees’ computer and Internet activity for any reason and without any specific notice.

E-MAIL SYSTEM ACCEPTABLE USAGE

BPA’s e-mail system is designed to improve service to our customers, enhance internal communications, and reduce paperwork. Employees shall ensure all communication through Company e-mail is conducted in a professional manner and adheres to the Company’s Behavioural Policies: BPA Conduct and Code of Ethics Policy, BPA Conflict of Interest Policy, BPA Privacy Policy, BPA Workplace Violence Policy and BPA Workplace Harassment Policy. Every attempt should be made to ensure confidential information is sent via encrypted e-mail attachments using Company approved encryption software. Employees are

prohibited from using BPA's e-mail system to engage in any commercial activity outside the scope of their employment with the Company.

PRIVACY

All information created, sent, or received via BPA's e-mail system, network, Internet or Intranet, including all e-mail messages and electronic files, is the property of BPA. Employees should have no expectation of privacy regarding this information. BPA reserves the right to access, read, review, monitor, and copy all messages and files on its computer system at any time and without notice.

COMPLIANCE

Electronic access systems are Company resources and are provided as business communications tools to support Company business. Use of BPA's network and e-mail system, and access to the Internet using Company computers is a privilege, not a right. All employees shall exercise good judgment when using these systems to ensure privileges are continued. Managers shall be responsible for the identification of both appropriate and inappropriate use. BPA reserves the right to suspend access at any time, without notice, for possible policy violation, security breach or other concerns.

Misuse and/or abuse of electronic access including but not limited to, personal use during working hours, visiting restricted sites, violating privacy policies, conducting unapproved commercial activity or sending abusive or threatening e-mail messages will result in disciplinary action up to and including termination.

Any employee aware of a policy violation should immediately report the violation to their Manager.

By signing and dating this document:

1. You agree that you have had the opportunity to review BPA's Electronic Access Policy and ask any questions regarding this document.
2. You agree to adhere to the Company's Electronic Access Policy.
3. You agree that you will be subject to disciplinary measures, including possible termination, if you violate the BPA Electronic Access Policy.

In this Policy "BPA" and "Company" mean any of the following BPA Financial Group companies: Benefit Plan Administrators Limited, Benefit Plan Administrators (Atlantic) Limited and BPA Consulting Group Limited.

ACKNOWLEDGEMENT OF RECEIPT AND UNDERSTANDING

I acknowledge receiving a copy of the BPA Electronic Access Policy either in writing or on the Company Intranet.

I acknowledge that the Company requires me to comply with the BPA Electronic Access Policy, and any amendments as may be made from time to time.

I confirm that I have read the BPA Electronic Access Policy.

I understand that in extreme cases, failure to comply with the BPA Electronic Access Policy can result in disciplinary action up to and including dismissal with cause.

I understand that employees are expected to disclose any potential violations of the BPA Electronic Access Policy to their Manager immediately.

I understand that if I have any questions with respect to the BPA Electronic Access Policy, I can ask my Manager for clarification at any time.

Employee's Signature _____ Date _____

Print Name _____

Manager's Signature _____ Date _____

Print Name _____

All employees are required to sign and return this document.

