

VIDEO SURVEILLANCE POLICY

Issued: November 26, 2013

Revised: N/A

Approved by the President & CEO

Policy statement

A video surveillance system is used by BCR Properties Ltd (BCRP) at selected sites on BCRP property for the purpose of managing train operations, increasing the safety and security of tenants, staff and members of the public, and to protect public safety, our corporate assets and property and to detect and deter criminal activity and vandalism.

The use of BCRP's video surveillance system is governed under the BC *Freedom of Information and Protection of Privacy Act* (FOIPPA) and the BC *Personal Information Protection Act* (PIPA), as applicable. BCRP recognizes that video surveillance technology has the potential for infringing upon an individual's right to privacy and although video surveillance technology may be required for legitimate operational, safety and security purposes; its use must be in accordance with applicable privacy laws.

This policy does not require or guarantee that a camera will be continuously monitored in real time, nor monitored and recorded at all times.

Purpose

BCRP will make limited use of a video surveillance system in the Roberts Bank Yard. The video surveillance system will be primarily used as follows:

- To assist in the efficient and safe movement of trains and yard switching in Roberts Bank Yard.
- To assist in the coordination and the safe handling of trains and switching movements in the Roberts Bank Yard.
- To assist in coordination of rail traffic and in the investigation of incidents and accidents that may occur.
- To provide security for the Engineering Services (ES) equipment and supplies.
- To spot unauthorized personnel trespassing in the Roberts Bank Yard.

The video surveillance system will not be used in any area where people have an expectation of privacy such as locker rooms and restrooms. The video surveillance system is not intended to be used as a method of tracking the work habits or productivity of individual employees working in the Yard.

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Management of Video Surveillance System

BCRP managers are responsible for the management of the video surveillance system.

Video Surveillance Monitoring

The video surveillance system is capable of being monitored from the office of Supervisor of Yard Operations at the Roberts Bank Yard Office and remotely by BCRP managers. The Supervisor of Yard Operations may view the video surveillance cameras continuously in real time, monitoring and assisting train movements in Roberts Bank Yard. BCRP managers may view historical footage when investigating specific incidents and accidents.

Video Surveillance Recording

All video surveillance cameras are capable of being recorded continuously by a digital video recording system. Recorded video is used exclusively by BCRP managers to assist in the coordination of rail traffic, to monitor yard inventory movements and to review incidents and investigate accidents in Roberts Bank Yard and not for any other purpose.

BCRP managers are responsible for the management of the video surveillance system and have exclusive control of the release of video recordings produced by the system.

Recorded video is not made directly available to other companies' management or employees or the general public. In the event that an incident or accident occurs employees should report it to a BCRP Manager. If the event occurred in an area where video surveillance coverage is available, the BCRP Manager will review the recorded video and make a determination if any video relevant to the incident is available. This video will be used by the BCRP Manager to investigate and resolve railway incidents and accidents. Only video clips determined by the BCRP Manager to be directly related to an incident or accident will be made available to the management of the railway or company whose employee or equipment is involved, upon written request.

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Requests to provide video recordings of non-railway incident/accident related activities to any outside party will not be accommodated unless required by a law enforcement agency or ordered by the courts.

Recorded video is generally stored for a period of approximately 60 days before it is automatically deleted. Any video associated with a specific accident or incident will be converted into a permanent video clip and stored for the duration of the investigation. Video clips which could become evidence in criminal proceedings will be kept indefinitely, unless otherwise directed by BCRP corporate officers.

Limitations of Video Surveillance Systems

Personnel should be aware that BCRP supervisors are not monitoring the cameras at all times and personnel should not have an expectation that they are under continuous surveillance while they are in range of a camera.

Personnel should also be aware that the video surveillance system has cameras that only cover specific locations in the Yard and even when the camera coverage exists; it may not provide the level of detail necessary to help with accident and incident investigation.