Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

REPLY RECORD OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.
(Returnable November 2, 2026)

Dated: October 31, 2026

CHAITONS LLP
5000 Yonge Street, 10th Floor
Toronto, ON M2N 7E9

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Lawyers for National Traffic Safety Management Inc.

TO: THE SERVICE LIST

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

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	A	General Ledger Extract
	B	Employee Impact Statement containing all signature pages
	C	Email Correspondence from Julia Kmetyk dated October 30, 2026

SERVICE LIST

(as of October 29, 2026)

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	Lawyers for Labourers' International Union of North America, Local 837
HIS MAJESTY THE KING IN RIGHT OF THE PROVINCE OF ONTARIO AS REPRESENTED BY THE MINISTER OF FINANCE Insolvency Unit 33 King Street West, 6th Floor Oshawa, Ontario L1H 8H5 **Steven Groeneveld** Tel: (905) 431-8380 Email: steven.groeneveld@ontario.ca; insolvency.unit@ontario.ca	**CANADA REVENUE AGENCY** c/o Department of Justice Tax Law Services Division 120 Adelaide Street West, Suite 400 Toronto, Ontario M5H 1T1 Email: AGC-PGC.Toronto-Tax-Fiscal@justice.gc.ca; Tessania.lawrence@justice.gc.ca; **Lawyers for Canada Revenue Agency**
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TAB 1

Docusign Envelope ID: CCA71271-94F1-844B-8378-1587FB533188

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

AFFIDAVIT OF ANTONIO BRUNO
(sworn October 31, 2026)

I, Antonio Bruno, of the City of Hamilton, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am the sole officer and director of National Traffic Safety Management Inc. (the "**Company**") and have held these roles since on or about April 13, 2026. As such, I have knowledge of the matters to which I depose in this affidavit, save and except for such facts or matters which are stated to be based on information and belief, and where so stated, I believe same to be true.

2. In connection with the November 2 Motions, I have sworn two affidavits, an Affidavit sworn October 26, 2026 (the "**October 26 Affidavit**") and an Affidavit sworn October 29, 2026 (the "**October 29 Affidavit**"). Terms not otherwise defined in this Affidavit shall have the meaning ascribed to such terms in my October 26 Affidavit and my October 29 Affidavit.

3. This Affidavit is sworn in reply to the:

   (i) Affidavit of Sam Tinebra sworn October 30, 2026 on behalf of Local 837 (the "**Union Affidavit**") and the Supplemental Affidavit of Sam Tinebra sworn October 30, 2026;

Docusign Envelope ID: CCA71271-94F1-844B-8378-1587FB533188

(j) Affidavit of John Levac sworn October 30, 2026 on behalf of Oxygen (the "**Oxygen Affidavit**") and Oxygen's motion for an order appointing TDB as Receiver over the Company's business and assets; and

(k) First Supplement to the Seventh Report of the Proposal Trustee dated October 31, 2026 (the "**Report**").

REPLY TO THE UNION AFFIDAVIT

4. I do not dispute that the Union is a significant stakeholder of the Company and that the Company is indebted to the Union for pre-filing amounts of approximately $650,000. I was not involved with the Company when this liability to the Union arose and accrued. As stated in my October 29 Affidavit, I became involved with the Company at the Union's request. In the Union Affidavit, Mr. Tinebra states that "neither I, nor anyone I know within Local 837 introduced Bruno to the Company". This is not a denial of the truth of my affidavit evidence that I was introduced to this Company by the people identified at paragraph 9 of my October 29 Affidavit.

5. With respect to post-filing Union obligations, it was disclosed throughout this proceeding that the Company was not in a position to pay post-filing obligations to the Union but that those would be satisfied on closing of the sale of the Company's business and assets to A2. In anticipation of A2's purchase, the Union negotiated and agreed to a payment plan with A2 for payment of the Company's pre-filing and post-filing obligations to the Union. It was only when the Ramudden offer was disclosed on or about October 19, 2026 that the Union withdrew its support from A2.

6. In the Union Affidavit, the Union raises concerns with the fact that I remained acting as a director and officer of the Company after the share sale transaction between A2 and certain of the Company's shareholders did not proceed. I note that there was no shareholder resolution replacing

Docusign Envelope ID: CCA71271-94F1-844B-8378-1587FB533188

me as a director or officer. Furthermore, the Union is aware that the Company's former management team abandoned the Company. Had I resigned as the director and officer at that time, the Company would have been left without management and Emkay would have re-possessed the vehicles thereby shutting down the Company's business, which would have forced the Company into bankruptcy and terminated the employment of the Company's employees. The main reason that the Company has remained in business and turned around its operations to the point where there is now interest from other parties is because of all of the work that I have done in the last six months restructuring the Company and substantially improving its profitability and viability.

7. The Union also raises concerns with the fact that the Company did not proceed with a request for interim financing in May 2026, despite filing materials indicating an intention to seek approval of such financing. As has been disclosed previously in the Company's court materials and Court attendances, Oxygen refused to allow the Company to obtain any financing that would prime its security. In the absence of a DIP charge that would rank in priority to Oxygen, the Company could not secure a DIP lender.

8. On October 27, 2026, the Union's counsel reached out to counsel for the Company to inquire about my compensation. I am advised by Harvey Chaiton, a lawyer with Chaitons LLP with carriage of this file, that he spoke with the Union's counsel on October 29, 2026 and advised that he was provided by the Company's CFO with an extract of the general ledger that recorded that I was paid compensation for work performed in the amount of $112,000 since April 2026.

9. I am also advised by Mr. Chaiton that the Union's counsel did not request documentation evidencing these amounts. A copy of the ledger extract evidencing the amounts that I received is attached hereto as **Exhibit "A"**.

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10. I was also particularly disappointed to see that the Union implied that I manufactured a family emergency to avoid providing information. On October 29, 2026, my partner was admitted to the hospital for surgery and is expected to remain there for the next week. I have been spending all of my time in the hospital with her in the last two days.

11. As I advised in my October 29 Affidavit, on October 29, 2026, the Company received an Employee Impact Statement signed by twenty-three of the Company's employees. I subsequently learned that the impact statement provided was signed by fifty-seven of the Company's employees. A copy of the Employee Impact Statement including all signature pages is attached hereto as **Exhibit "B"**.

12. The substantial majority of employees unequivocally object to the Ramudden transaction and support the continuation of the Company under my stewardship.

13. On October 30, 2026, counsel for the Company received an email from Julia Kmetyk, a unionized employee of the Company, who describes a telephone call that she received from a Union representative from Local 837. A copy of Ms. Kmetyk's email is attached hereto as **Exhibit "C"**. It appears from the email that Local 837 is taking active steps to intimidate and silence the Company's employees to prevent them from expressing their support for me and A2.

14. In its supplementary materials, the Union states that it became aware that Vanessa Joncas was involved with the employees' efforts to present their position to the Court and to the Union. The Union claims that Ms. Joncas is management and is excluded from Local 837's bargaining unit. Ms. Joncas is a member of Local 183 and although she works part time as an operation manager responsible for scheduling, she also does flagging.

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15. I also wish to address the Union's statement that approximately 18 of "the signatories were not listed on remittance reports for July, August or September 2026". The Union does not identify who those signatories are. I reviewed the remittance reports and the signatories on the employee impact statement and note that 11 signatories to the letter are not currently union members. One of these employees is part of the management team. The remaining employees are new hires who were hired when the Union did not have members to send to fill the required demand.

REPLY TO OXYGEN

16. On October 27, 2026, Oxygen delivered to the Company notice that it was in breach of the Forbearance Agreement. The Company disputes that it is in breach of the Forbearance Agreement. Each of the alleged events of default are addressed below:

(a) **Failure to continue to carry on business in the normal course at all times in the same manner as its business has previously been carried on, having regard to the NOI Proceedings and any restructuring efforts undertaken by the Company** – no particulars are provided by Oxygen to explain this default. The Company has continued to carry on business in the ordinary course during these proceedings.

(b) **Failure to pay the Lender any amounts required** – no particulars are provided by Oxygen to explain this default. The Company has not missed any payments to Oxygen under the Forbearance Agreement or otherwise. At the time of the Second NOI filing, Oxygen was owed the principal amount of $800,000 plus accrued interest of approximately $35,000 under the term loan. Since then, the Company has reduced the principal amount owing under the term loan to approximately $570,000 and interest has been brought current.

(c) **Oxygen's security ceased to constitute a valid and first ranking charge, other than a result of the NOI Proceedings, or any Order of the Court** – no explanation for this alleged default is provided. Other than the Administration Charge, which was

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consented to by Oxygen, the only amounts owing by the Company that may have priority to Oxygen are the unpaid pension and source deductions. Failure to remit those amounts has been disclosed to Oxygen throughout this proceeding and Oxygen remained supportive of the Company's efforts to restructure and of me acquiring the Company's business until on or about October 19, 2026, when the Ramudden offer was disclosed.

REPLY TO PROPOSAL TRUSTEE

17. In the Report, the Proposal Trustee continuously asserts that it conducted a "competitive sale process". In fairness, there has been no "sale process".

18. As described in my previous affidavits, the Company put together a stalking horse purchase agreement that contemplated a three week sale process to test the market. Ultimately, the Proposal Trustee was not supportive of the stalking horse sale process. Although the Proposal Trustee states that it was opposed to the stalking horse fee, I offered to reduce the fee and to negotiate it further. Ultimately, the Proposal Trustee and its counsel advised that they did not think there was sufficient time to run a sale process.

19. It was only after the Company advised the Court that it received the offer from A2 for the Company's business and intended to return to Court to seek approval of same that Ramudden, the Company's competitor, provided to the Proposal Trustee a formal expression of interest. After receiving this expression of interest, the Proposal Trustee elected to provide all interested parties with an extra 3 days to submit their final offers.

Docusign Envelope ID: CCA71271-94F1-844B-8378-1587FB533188

FINANCING OF THE PROPOSAL

20. I was advised by the Company's counsel today that following receipt of the Union's and Oxygen's responding materials, COR withdrew its Offer of Financing.

21. Yesterday, I began to get concerned with COR's willingness to provide financing and proceeded to reach out to Altitude with the request to seek an alternative lender to fund the Company's proposal to its creditors.

22. Unless I have a credible letter of intent or commitment letter by Monday morning, neither the Company nor A2 will object to the approval of the Ramudden transaction.

23. I swear this affidavit in response to the Proposal Trustee's motion and in support of the Company's motion for approval of the DIP Loan and the granting of the DIP Charge, and for no other or improper purpose.

SWORN REMOTELY by Antonio Bruno of the City of Hamilton, in the Province of Ontario, before me via videoconference at the City of Toronto, in the Province of Ontario, on this 31st day of October, 2026

Signed by:
Maleeha Anwar
13D099BA19D8449...

MALEEHA ANWAR (92961B)

Signed by:
Antonio Bruno
E6054C06B74A4BA...

ANTONIO BRUNO

THIS IS EXHIBIT "A" TO THE

AFFIDAVIT OF ANTONIO BRUNO

SWORN BEFORE ME THIS 31ST

DAY OF OCTOBER, 2026



A Commissioner Etc.

2:13 PM
10/21/26
Accrual Basis

National Traffic Safety Management Inc.
Transactions by Account
As of October 31, 2026

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1					Type	Date	Num	Name	Memo	Class	Clr	Split	Amount	
2														
3			Antonio Bruno											
4			Start Date		General Journal	04/24/2026			**Zero Funds paid to Antonio between April 24th to June 24th**				0.00	
5					General Journal	06/24/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(12,500.00)	
6					General Journal	07/08/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(5,000.00)	
7					General Journal	07/13/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(2,500.00)	
8					General Journal	07/20/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(5,000.00)	
9					General Journal	07/31/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(6,000.00)	
10					General Journal	08/12/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(6,000.00)	
11					General Journal	08/27/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(5,000.00)	
12					General Journal	09/08/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(15,000.00)	
13					General Journal	09/24/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(10,000.00)	
14					General Journal	10/01/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(5,000.00)	
15					General Journal	10/15/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(10,000.00)	
16					General Journal	10/20/2026			PAYMENT TO Antonio Bruno			1004 · 05602 - 1028802 Operating	(10,000.00)	
17					General Journal	10/22/2026			PAYMENT TO Antonio Bruno			1005 · 05602 - 1028802 Operating	(20,000.00)	
18														
19			Total Antonio Bruno										(112,000.00)	
20													(112,000.00)	
21	TOTAL												(112,000.00)	
22														
23														

THIS IS EXHIBIT "B" TO THE

AFFIDAVIT OF ANTONIO BRUNO

SWORN BEFORE ME THIS 31ST

DAY OF OCTOBER, 2026



A Commissioner Etc.

EMPLOYEE IMPACT STATEMENT

National Traffic Safety Management Inc.

Re: Proposed Sale to Ramudden Global (Canada) Inc.

Ontario Superior Court of Justice – Commercial List

Court File No. BK-26-03364251-0032

October 28, 2026

Our Commitment to National Traffic and Antonio Bruno

We, the undersigned employees of National Traffic Safety Management Inc., wish to express our strong support for Antonio Bruno and our desire to see National Traffic continue operating independently under his leadership.

When Antonio assumed control of National Traffic in April 2026, the company was facing serious financial and operational challenges. Employee morale, job security, equipment reliability, and the future of the business were all uncertain.

Antonio stepped into a difficult situation and immediately began making meaningful changes. He demonstrated leadership, commitment, determination, and a genuine willingness to invest in the company's future and its employees.

Under his direction, National Traffic has experienced significant improvements in its operations, fleet maintenance, organization, accountability, and overall business development. Equipment that had been sitting idle was repaired and returned to service. Operational efficiencies were introduced, business opportunities expanded, and employees were given renewed confidence in the company's future.

Most importantly, Antonio kept people working.

Rather than allowing National Traffic to close its doors, he took on the responsibility of rebuilding a struggling company. His efforts have helped protect jobs, strengthen operations, and restore pride among employees.

We Believe in the Future of National Traffic

National Traffic is more than a company name to us. It represents our livelihoods, our coworkers, our professional relationships, and the business we have worked hard to build.

We take pride in wearing the National Traffic name, representing the company on Ontario's roads and highways, and providing professional traffic management services to our customers.

Over the past several months, we have witnessed the progress being made under Antonio's leadership. We believe the company is moving in the right direction, and we want the opportunity to continue contributing to that success.

We do not want to abandon the progress that has been made, lose our identity as National Traffic employees, or be forced into an uncertain future under different ownership.

We want to continue working, growing, and building National Traffic into a stronger, more successful organization.

Our Position Regarding the Proposed Ramudden Acquisition

We wish to make our position clear.

We want to continue working for National Traffic Safety Management Inc. under the leadership of Antonio Bruno. We do not support the proposed acquisition by Ramudden Global (Canada) Inc., and we do not wish to become employees of Ramudden.

Our position is not simply about resisting change. It is about protecting the company we believe in, supporting the leadership that has demonstrated its commitment to us, and preserving the working relationships and company culture that have been strengthened over the past several months.

A sale to Ramudden would create considerable uncertainty for employees regarding future employment, job security, working conditions, seniority, company identity, and the relationships we have established.

We do not want to start over with another organization when we believe National Traffic has the leadership, employees, experience, and potential to succeed on its own.

We are proud of National Traffic. We believe in Antonio Bruno's vision for the company, and we want to be part of its continued growth.

The Human Impact — More Than 70 Families

This decision has the potential to directly affect approximately 70 employees and their families.

These are not simply positions on a payroll or numbers in a financial transaction. These are hardworking individuals, parents, spouses, and family members who depend on National Traffic to provide financial stability, security, and a future for their households.

For many of us, our employment supports mortgages, rent, groceries, childcare, education, and the everyday necessities of life. The uncertainty surrounding the proposed sale creates real concern for the people and families whose livelihoods are connected to this company.

Over the past several months, Antonio Bruno has worked to restore stability and confidence in National Traffic. We have seen improvements, renewed opportunities, and a company that is moving forward rather than shutting down.

We respectfully ask the Court to recognize that its decision will affect not only the future ownership of National Traffic, but also the livelihoods, stability, and peace of mind of approximately 70 families.

We are not asking for special treatment. We are asking for the opportunity to continue working for the company we believe in, under the leadership of the person who stepped forward when our jobs were at risk.

Our employees are the foundation of National Traffic. We are the people who work long hours, maintain safety on Ontario's roads, serve our customers, and contribute directly to the company's success.

We believe our voices, our commitment, and our desire to remain with National Traffic deserve meaningful consideration.

Independent Employee Initiative

We wish to make clear that this Employee Impact Statement was initiated, discussed, prepared, and circulated independently by employees of National Traffic Safety Management Inc. Antonio Bruno did not approach, request, direct, encourage, or ask any employee to prepare or sign this statement, nor did we seek his advice or involvement in drafting it. The views expressed are our own, and each employee who signs does so voluntarily and without pressure or expectation from management.

Our Request to the Court

We respectfully request that the Court consider the wishes and interests of National Traffic employees when evaluating the competing proposals.

We ask that Antonio Bruno and his team be given a fair opportunity to complete their restructuring and financing arrangements and present a viable plan that allows National Traffic to continue operating under its existing identity and leadership.

We understand that financial obligations and creditor interests must be considered. However, we believe that preserving jobs, maintaining workforce stability, and allowing the progress already achieved to continue are important considerations in determining the company's future.

We stand behind Antonio Bruno.

We believe in National Traffic.

We want to continue working for National Traffic, not Ramudden.

We want to protect the livelihoods of approximately 70 employees and their families.

We want to be part of the company's future, not its sale to a competitor.

Respectfully submitted,

The Undersigned Employees of National Traffic Safety Management Inc.

Employee signatures attached on the following pages.

EMPLOYEE SIGNATURES

National Traffic Safety Management Inc.

Employee Impact Statement — October 28, 2026

Court File No. BK-26-03364251-0032

By signing below, I confirm that I have read the Employee Impact Statement and voluntarily support the position expressed in it.

No.	Printed Name	Signature	Date
1	Albert J	Johnson	Oct 28th/26
2	Darcy Peppel		Oct 28/26
3	Jessie Olivieri		Oct 28/26
4	Josh Hutcheon		Oct. 28/26
5	Joey Gluckie		Oct 28/26
6	Austin Poitras		—
7	Jordan Chimenti		oct/28/2026
8	Ashley Terryberry		oct 28/26
9	John Cumin		Oct. 28/26
10	Michael Bissonnette		Oct 28/2026
11	Davey Moore		oct 28/26
12	Liam Lindsay		oct 28/26
13			
14			
15			

Signatures are voluntary. Additional pages may be attached as required.

EMPLOYEE SIGNATURES — CONTINUED

National Traffic Safety Management Inc.

Employee Impact Statement — October 28, 2026

Court File No. BK-26-03364251-0032

By signing below, I confirm that I have read the Employee Impact Statement and voluntarily support the position expressed in it.

No.	Printed Name	Signature	Date
16	Tenille Moreira		10/28/26
17	Shamel Rahman		10/28/26
18	Nick Ward		10/29/26
19	RYDAN JOCAMTO		10/29/26
20	DON HABIUK		10/29/26
21	JEFF SMITH		10/29/26
22			
23			
24			
25			
26			
27			
28			
29			
30			

Signatures are voluntary. Additional pages may be attached as required.

EMPLOYEE SIGNATURES

National Traffic Safety Management Inc.

Employee Impact Statement — October 28, 2026

Court File No. BK-26-03364251-0032

By signing below, I confirm that I have read the Employee Impact Statement and voluntarily support the position expressed in it.

No.	Printed Name	Signature	Date
1	KAROL HAJDU		OCT 28 2026
2	Vanessa Joncas		10/28/2026
3	DON [illegible]		OCT 28/26
4	William Marr		OCT 28/2026
5	Kyle Cormier		OCT 28/26
6	Jeff Lemba		Oct 28/26
7	DARYL WELLS		OCT 28/26
8	Jamaal Martin		Oct 28 26
9	Don Losier		Oct 28/26
10	Zac Miller		Oct 28/26
11	Ian Landry		OCT 28/26
12	Cyrlain Mugo		Oct 28th 2026
13	Steven Bilko		Oct 28th 2026
14	James Pentelicke	James Pentelicke	Oct 28th 2026
15	Thomas Daly		Oct/28/2026

Signatures are voluntary. Additional pages may be attached as required.

EMPLOYEE SIGNATURES — CONTINUED

National Traffic Safety Management Inc.

Employee Impact Statement — October 28, 2026

Court File No. BK-26-03364251-0032

By signing below, I confirm that I have read the Employee Impact Statement and voluntarily support the position expressed in it.

No.	Printed Name	Signature	Date
16	JAMES JARVIS		10/28/2026
17	RYLEY VALADE		10/28/2026.
18	Cameron Young		10/28/2026
19	Julia Kmetyk		10/28/2026.
20	Jay Stafford		10/28/26
21	Gisa Mukama	Gisa	10/28/2026
22	Kelsean Cormier		10/28/2026
23	Patti Mingle		10/29/2026
24			
25			
26			
27			
28			
29			
30			

Signatures are voluntary. Additional pages may be attached as required.

Docusign Envelope ID: 9E19DAF8-853A-8D7D-83A8-454418A7BCF5

Our Request to the Court

We respectfully request that the Court consider the wishes and interests of National Traffic employees when evaluating the competing proposals.

We ask that Antonio Bruno and his team be given a fair opportunity to complete their restructuring and financing arrangements and present a viable plan that allows National Traffic to continue operating under its existing identity and leadership.

We understand that financial obligations and creditor interests must be considered. However, we believe that preserving jobs, maintaining workforce stability, and allowing the progress already achieved to continue are important considerations in determining the company's future.

We stand behind Antonio Bruno.

We believe in National Traffic.

We want to continue working for National Traffic, not Ramudden.

We want to protect the livelihoods of approximately 70 employees and their families.

We want to be part of the company's future, not its sale to a competitor.

Respectfully submitted,

The Undersigned Employees of National Traffic Safety Management Inc.

Employee signatures attached on the following pages.

Oct 29, 2026	Signed by: 0B16705ABC9848B...	Bryan Persaud
Oct 28, 2026	Signed by: 7351442D14014F3...	Jasmine Anif
Oct 29, 2026	Signed by: E6BFE1E3671144E...	Jason Gray
Oct 28, 2026	Signed by: EC0AE02E9B574D6...	Matthew Clarke

Docusign Envelope ID: EDEC9578-8147-8B97-81DB-21FAD05D15B0

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Oct 28, 2026	Signed by: E2988BB74AE2452...	Livia Isaro
Oct 28, 2026	DocuSigned by: Michael Lyons D53998444072451...	Michael Lyons
Oct 29, 2026	Signed by: CF63F7EBC06940C...	Rhomair Gayle
Oct 28, 2026	Signed by: C5E5D44164BA410...	Shangeeve Ilangovan

Docusign Envelope ID: F2847F7A-5948-89C3-838B-FCC222BB3F2D

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Oct 28, 2026	Signed by: 4DE16589CC814C5...	Michael Watson
Oct 28, 2026	DocuSigned by: C63D5D3B77B24CD...	Rebecca Wilson
Oct 28, 2026	Signed by: 2B485520808F47A...	Richard Bennett
Oct 28, 2026	Signed by: Yves Tuyishimire 82965A6F29684E8...	Yves Tuyishimire

Docusign Envelope ID: 70681CEC-522C-8A2F-835A-8036006D5F22

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The Undersigned Employees of National Traffic Safety Management Inc.

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Oct 29, 2026	Signed by: E0E2CDA3BAB04C3...	Aloysius Young
Oct 29, 2026	DocuSigned by: Jacobi Laidley 0EDA48B0ECA84E2...	Jacobi Laidley
Oct 29, 2026	Signed by: B25AFF313C254FF...	Tony Nwaiwu

Docusign Envelope ID: C3629B7B-4DA3-89AE-8086-10C4B8FD973E

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The Undersigned Employees of National Traffic Safety Management Inc.

Employee signatures attached on the following pages.

Oct 28, 2026

Signed by:
Carina Alves
8EBB09F8F565460...

Carina Alves

THIS IS EXHIBIT "C" TO THE

AFFIDAVIT OF ANTONIO BRUNO

SWORN BEFORE ME THIS 31ST

DAY OF OCTOBER, 2026



A Commissioner Etc.

From: Julia Kmetyk <jkmetyk@ntsminc.com>
Date: October 30, 2026 at 11:59:01 AM EDT
To: "Harvey G. Chaiton" <Harvey@chaitons.com>
Subject: Concerns Regarding Employee Advocacy and Union Telephone Conversation

CAUTION: [External]

Concerns Regarding Employee Advocacy and This Morning's Telephone Conversation

I received a deeply concerning telephone call this morning from Trevor Popovich from Liuna 837 Union, regarding the employee impact letter that has been circulating and signed by employees of National Traffic.

Trevor questioned whether I knew about the letter and raised allegations that

employees had been pressured into signing it. As the questioning continued, I acknowledged that I had written the letter and stated unequivocally that I stand behind its contents. I made it clear that I had not instructed or forced anyone to sign it. There were 57 employees that signed voluntarily.

The conversation became extremely heated. Trevor stated that the letter was causing problems. I responded that its purpose was to draw attention to the serious concerns affecting our employees and their livelihoods. When he suggested that the letter should disappear, I refused to make it disappear and explained that it was already included in the court documents and available for review. I felt bullied and harassed by Trevor, who represents Liuna 837, asking me to make the letter disappear and raising his voice to me.

I am deeply committed to this company and the approximately 70 people I work alongside—people I consider family. Their jobs, financial security, and futures deserve to be taken seriously.

During the conversation, Trevor alleged that Antonio Bruno was lying to me and was aligned with Ramudden. I strongly disputed those statements and referred him to the information available online. I also raised concerns about the money at issue, which I understand to be money belonging to employees, and questioned whose interests were being represented.

I asked why, if the union was concerned about our well-being, representatives had not visited our work sites to address employees directly, answer questions, and help ease their fears. I emphasized that the union's responsibility is to represent its members and questioned what I perceived as support for Ramudden while employees were expressing support for Antonio and National Traffic.

Trevor also stated that the union's lawyer wanted to speak with me about the letter. I reiterated that the letter was before the court and could be reviewed through that process.

I experienced the tone and direction of this conversation as intimidating, threatening and as an attempt to pressure me into withdrawing my support. I acknowledge that I responded emotionally and forcefully. However, my position remains firm: employees deserve to express their concerns freely, and those concerns should be addressed respectfully.

My colleagues have asked me to help protect our company and keep our team together. That is what I am trying to do. I also raised a direct concern about my own employment: if speaking out costs me my job, who will stand behind me?

Our livelihoods are not abstract issues. They support real people and real families. I stand behind the letter and my commitment to our employees, and I expect our concerns to be met with answers, transparency, and respect.

Julia Kmetyk

National Traffic Safety Management

NTSM

905-933-7670

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at TORONTO

AFFIDAVIT OF ANTONIO BRUNO
(SWORN OCTOBER 31, 2026)

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Tel: (416) 218-1128
Email: manwar@chaitons.com

Lawyers for National Traffic Safety Management Inc.

IN THE MATTER OF THE NOTICE OF INTENTION TO MAKE A PROPOSAL OF NATIONAL TRAFFIC SAFETY MANAGEMENT INC.

Court File No. BK-26-03364251-0032

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

Proceedings commenced at TORONTO

REPLY RECORD
(Returnable November 2, 2026)

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Toronto, ON M2N 7E9

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Lawyers for National Traffic Safety Management Inc.