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.

SUPPLEMENTARY RESPONDING MOTION RECORD OF LABOURERS' INTERNATIONAL UNION OF NORTH AMERICA, LOCAL 837
(Motion returnable November 2, 2026)

October 30, 2026

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Tab A

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.

SUPPLEMENTARY AFFIDAVIT OF SAMMY TINEBRA

I, Sammy ("Sam") Tinebra, of the City of Hamilton, in the Province of Ontario, MAKE OATH AND SAY:

1. I am the Secretary Treasurer and Business Representative for the Labourers' International Union of North America, Local 837 ("**Local 837**" or the "**Union**") and as such I have knowledge of the matters described herein.

2. I make this affidavit in support of the Proposal Trustee's motion to approve the proposed transaction by Ramudden Global (Canada) Inc. ("**Ramudden**") and in support of any other such relief as the Union's counsel may advise.

National Traffic Management Inc.'s Unfair Labour Practice

3. After finalizing my first affidavit today I was forwarded an email from Vanessa Joncas to Company's counsel and the proposal trustee. A copy of the email is attached as **Exhibit "1".** From my review of the email, yesterday the Company's counsel and the Proposal Trustee were

forwarded a copy of the Employee Impact Statement by Vanessa Joncas. Ms. Joncas is a member of management and is excluded from Local 837's bargaining unit.

4. Based on the email, it appears that management was involved in the preparation and circulation of the Employee Impact Statement. The Union intends to file an unfair labour practice complaint for breaches of *inter alia* ss. 70, 72, and 76 of the *Labour Relations Act, 1995*, SO 1995, c 1, Sch A (the "**Act**"). Sections 70, 72 and 76 prohibit, *inter alia*, an employer from interfering with the administration or representation of employees by a trade union and intimidating or coercing union members from exercising their rights under the Act, including membership in a trade union.

5. In addition to violating the Act, the involvement of management in the preparation and circulation of the Employee Impact Statement, renders the statement inherently unreliable.

Local 183 and Local 506's Outstanding Remittances

6. I am advised by our counsel and do verily believe that LiUNA Local 183's pre-filing remittance entitlements total $71,173.38 and that LiUNA Local 506's pre-filing remittance entitlements total $15,261.47

7. I make this affidavit in support of the Union's position on the motion and for no improper purpose.

SWORN BEFORE ME at the City of Toronto, in the Province of Ontario on October 30, 2026 in accordance with O/Reg/431/20, Administering Oath or Declaration Remotely.

Sam Tinebra (Oct 30, 2026 16:01:20 EDT)

Commissioner for Taking Affidavits
(or as may be)
DANIELLE STAMPLEY LSO #69487C

SAMMY TINEBRA

This is Exhibit "1" referred to in the Supplementary Affidavit of Sam Tinebra sworn by Sam Tinebra of the City of Hamilton, in the Province of Ontario, before me at the City of Toronto, in the Province of Ontario, on October 30, 2026 in accordance with O. Reg. 431/20, *Administering Oath or Declaration Remotely*.



DANIELLE STAMPLEY LSO#69487C

From:	Vanessa@ntsminc.com
To:	harvey@chaitons.com
Cc:	btannenbaum@tdbadvisory.ca; Jeff.Larry@paliareroland.com; jberger@tdbadvisory.ca; nthurairatnam@tdbadvisory.ca; maya@chaitons.com; manwar@chaitons.com
Subject:	[EXTERNAL] Collective Employee Impact Statement
Date:	October 29, 2026 7:20:28 PM
Attachments:	Signed - Collective Employee Impact Statement NTSM.pdf

---

Hi Harvey,

On behalf of the employees of National Traffic Safety Management Inc., please find attached our Collective Employee Impact Statement, which includes 57 signatures from staff members.

Could you please confirm receipt of the attachment and verify that all 12 pages have been received? Please note that pages 8-12 contain signatures collected electronically through DocuSign.

Thank you for your time and consideration. We sincerely appreciate your attention to this matter and your willingness to review our employees' statement.

Kind regards,

Vanessa Joncas
Operations Manager
National Traffic Safety Management Inc.
vanessa@ntsminc.com
https://ntsminc.com/
M: 647-642-4203
O: 1-844-399-1010

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any use, disclosure, dissemination, distribution or copying of any portion of this message or any attachment is strictly prohibited.

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			
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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

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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

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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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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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Respectfully submitted,

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

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

Court File No. BK-26-03364251-0032

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SUPERIOR COURT OF JUSTICE
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PROCEEDING COMMENCED AT
TORONTO

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(Motion returnable November 2, 2026)

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Lawyers for the Labourers' International Union of North America, Local 837