

SCHEDULE "A" TO UNFAIR LABOUR PRACTICE COMPLAINT
UNDER SECTION 55 OF THE ACT

Complaint Summary

1. This Complaint concerns the Employer, Imperial Cleaners Limited, intimidating employees to the point that one felt the need to resign to protect themselves and their family from reprisals.
2. The Employer's campaign of intimidation is aggravating the chilling effect its terminations have on employees' willingness to exercise their rights under the Act.

Parties

3. The Complainant, Service Employees International Union, Local 2 (the "Union" or "SEIU") is a trade union under the *Trade Union Act* and is the certified bargaining agent for employees across Canada, including but not limited to, bargaining units of employees in the contracted commercial cleaning industry in Nova Scotia.
4. The Respondent, Imperial Cleaners Limited (the "Employer" or "Imperial") is a contractor providing commercial cleaning services at various client sites, including but not limited to, construction, commercial, and municipal sites.
5. The Affected Person, Worker3, is or was an employees of Imperial and in the proposed bargaining unit in the Union's Application for Certification at the Alderney Gate location.

Background

6. Worker3 was employed by Imperial as a full-time cleaner. She worked at various locations, including regular weekdays at Alderney Gate during the day and Northbrook Police Training Facility in the evenings.
7. Worker3 regularly worked more than forty-eight (48) hours per week but was never paid at an overtime rate.
8. Worker3's mother is employed by Imperial.

9. In November 2025, Worker3 was aware of the Union organizing campaign and was aware that Worker1 and Worker2 were supporters of the Union organizing campaign.
10. On Thursday, November 27, 2025, Imperial manager, [Imperial Mgr], told Worker3 Imperial had terminated Worker1's employment. Worker3 knew Worker1 was a Union supporter.
11. On Thursday, November 27, 2025, when Worker2 arrived for his shift shortly after 4:00 p.m., Worker3 told Worker2 [Imperial Mgr] told her he was not welcome to complete his shift. When Worker2 asked Worker3 why he was being fired, and that he did nothing wrong, Worker3 said she was not sure, but that he could direct any questions to [Imperial Mgr] at her office the following Monday.
12. Imperial asked Worker3 to work the Sunday shift at Alderney Gate that Worker1 would usually work. [Imperial Mgr] informed Worker3 she and another worker would be paid cash (i.e., no deductions) for the shift.
13. Worker3 was responsible for providing orientation of a new employee assigned to the Alderney Gate site. During that orientation, Worker3 told the new employee that Imperial terminated Worker2 and Worker1 because of their involvement in forming a union.
14. Between November 27 and December 1, 2025, Worker4 told Worker3 that Worker4 and her brother, Worker5 told [Imperial Mgr] that Worker2 was responsible for campaigning to organize the union.
15. On Monday, December 1, 2025, Imperial directed Worker3's mother, also an employee of Imperial, to attend a meeting in the Imperial office at 2:30 p.m. During that meeting, [Imperial Mgr] asked the mother questions about the Union. The mother responded with words to the effect of, "I want nothing to do with this." [Imperial Mgr] responded, "That's the confirmation we need."
16. When she was leaving the meeting, Worker3's mother asked for the company gas card used to pay for fuel to travel between sites. [Imperial Mgr] said words to the effect of, "No, none of that any more."
17. Worker3's mother told Worker3 what took place in the meeting.

18. Worker3 was distraught that her mother was being targeted. Worker3 believed Worker1 and Worker2 had been terminated because of their support for the Union, as she told the new worker. In an effort to protect her mother from further reprisals, Worker3 resigned her employment. At about 3:00 p.m. that day, Worker3 texted [Imperial Mgr] words to the effect of, "I'm done. I quit. I can't do anything right. I didn't want to join the Union but I was convinced. I left my pass at the Northbrook Police Centre."
19. When Worker3 received her final pay cheque, she noticed her hourly wage rate for her work at the Northbrook Police Training Facility was decreased from \$24.50 to \$17.00, despite it being a site where work is paid at a living wage, per the client, Halifax Regional Municipality, requirements.

Unfair Labour Practices

20. SEIU says Imperial violated sections 53(1)(a), 53(3)(a),(b),(e), and 58 of the Act by intimidating Worker3 and her mother, and the intimidation was so severe it caused Worker3 to resign her employment.
21. Worker3 knew Worker1 and Worker2 were Union supporters. Worker3 was aware that Worker1 and Worker2 had been terminated without cause, likely because of their support for the Union. Worker3 knew Worker5 told Imperial about the Union organizing campaign and who supported it. Imperial directed Worker3's mother to attend at their office to be subjected to questions about the Union. In an effort to protect her mother, and to avoid further intimidation, Worker3 resigned her employment. Worker3 felt she could not continue in her employment as a result of Imperial's unfair labour practices.
22. Imperial unilaterally, and without notice, reduced Worker3's wage rate and revoked Worker's mother's access to the gas card in retaliation against her for her perceived support for the Union.

Remedy Requested

23. The Union requests the following remedies
- a. A declaration that the Employer violated the Act;

- b. An order that the Employer cease violating the Act;
- c. An order that [REDACTED] be reinstated to her position and made whole for any damages suffered as a result of the Employer's violations of the Act;
- d. An order that the Board's order be posted at a location in the workplace where it is visible to all employees;
- e. Remedial certification;
- f. An order requiring Imperial and any affected client to allow SEIU representatives to enter all of Imperial's worksites in Halifax and access employees; and
- g. Any other remedy the Board deems just and reasonable.