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SCOPE: This policy applies to all Dexterra Group employees, divisions, subsidiaries and joint ventures. This policy shall also apply to consultants, temporary and agency workers, relevant third parties, contractors and visitors

1.0 POLICY

- At Dexterra Group, we value inclusivity, diversity and the promotion of employee health and safety. We are committed to ensure a safe and respectful work environment that is free from discrimination and harassment. Dexterra Group prohibits all forms of workplace discrimination and harassment, including psychological harassment and bullying that are unlawful under Human Rights and Occupational Health and Safety legislations based on prohibited grounds of discrimination listed in this policy and/or any legislative requirements in which we do business. The prohibited grounds of discrimination include but are not limited to race, national or ethnic origin, colour, religion or creed, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, physical size or weight, disability, sex, (includes pregnancy and childbirth), sexual solicitation or harassment, sexual orientation, gender identity or expression, marital status, family status, disability (mental and physical disability), association, or conviction for an offence for which a pardon has been granted or a record suspended.
- Dexterra Group will not tolerate behaviour from anyone that intimidates, threatens, harasses, abuses, injures or otherwise victimizes our employees, and we will ensure, so far as is reasonably practicable, steps are taken to protect our employees from potential hazards associated with workplace violence and harassment.
- Dexterra Group shall take all allegations of discrimination and harassment seriously, respond promptly and confidentially and take appropriate remedial or disciplinary action to prevent further discrimination and harassment, up to and including termination. All employees are protected against reprisal, threats of reprisal or retaliation for exercising their rights under this policy
- The policy applies to behaviour in all work-related settings whether inside or outside of Dexterra Group’s facilities or assigned locations, and all work-related activities such as business travel and

socializing for business or corporate sponsored events. Non-employees include job applicants, customers, independent contractors, suppliers, vendors and any other persons who interact with Dexterra Group's employees in joint ventures and other business relationships. It covers all aspects of the service and employment environments, from recruitment and hiring through to termination

- The policy is not meant to inhibit properly discharged managerial responsibilities including appropriate corrective action, performance reviews and counselling.

2.0 DEFINITIONS

Discrimination is unfair treatment of an individual or group on the basis of membership in a group protected by this policy and on the grounds listed in Section 1.0 above. Such differential and unequal treatment denies the individual or group opportunities, benefits or advantages that are available to other people. Discrimination does not have to be intentional for it to be against the law. It is the impact that matters.

Workplace harassment is a form of discrimination. It is defined as "a course of vexatious comment or conduct against a worker in a workplace that is known or ought to be reasonably known to be unwelcome." These words and actions may include acts of intimidation or threats that demean, belittle, or cause personal humiliation or embarrassment. Workplace harassment also includes what is often called "psychological harassment" or "personal harassment." Psychological harassment is defined as any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects a worker's dignity or psychological or physical integrity and that results in a harmful work environment for the worker. Harassment is normally a series of incidents but can be one egregious incident which has a lasting impact on the individual. All inappropriate behaviour is not harassment but still needs to be addressed.

When harassment is grounds-based, it is a violation of the Human Rights Code. If not, it is a violation of the Occupational Health and Safety legislation.

Examples of workplace harassment include, but are not limited to:

- Unwelcome remarks, jokes, innuendos, threats, written or graphic material or taunting about a person's age, disability, sex, sexual orientation, racial or ethnic background, place of birth, religion, gender expression, gender identity, marital status, family status, citizenship or ancestry, pardoned conviction or any other grounds of discrimination;
- Threatening or intimidating someone; unwelcome physical contact; or,
- Refusal to work with or share facilities with other employees because any of the grounds prohibited by this policy.
- Psychological harassment. Bullying.

Note: Supervisor or Manager conduct that is consistent with the responsibilities and accountabilities of their role, including performance management, training, work assignment and discipline, does not constitute Personal Harassment.

Sexual harassment is a form of discrimination. Harassment because of sex is usually dealt with separately in human rights law because there are characteristics and provisions that are specific to sex as a prohibited ground. Sexual harassment is offensive, humiliating and unwelcome behaviour of a sexual nature that is related to a person's sex or gender when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or;
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual;
- Such conduct is so severe and/ or pervasive it has the purpose or effect of unreasonably interfering with the person's employment, work performance or engagement in the workplace.
- It is one-sided and includes an attempt to coerce an unwilling person into a sexual relationship, and so creates a work environment that a reasonable person would find intimidating, hostile or offensive.

- Sexual harassment includes sexual misconduct, sexual violence, sexual assault, stalking, and gender-based bullying. Sex is interpreted as gender difference and so, the prohibited grounds of sex, gender identity and gender expression apply.

Examples of sexual harassment include but are not limited to:

- Unwelcome sexual advances. Deliberate non-consensual sexual touching: of a person's body.
- Unwelcome conduct of a sexual nature that affects the work environment including when it takes place after work and in a non-work environment
- Verbal conduct, such as epithets, derogatory comments, slurs, jokes, unwanted sexual invitations, written or verbal references to sexual conduct. advances, invitations or comments
- Visual and nonverbal conduct, such as derogatory posters, cartoons or drawings, or gestures.
- Threats and demands to submit to sexual advances or requests in order to keep one's job or avoid some other loss, and offers of employment benefits in exchange for sexual favors
- Comments or conjecture about a person's sexual orientation or gender identity

Note: Sexual harassment does not preclude normal, mutually acceptable social relationships that develop in the workplace. Furthermore, compliments given to individuals and other exchanges that are socially acceptable, professional and free from sexual innuendo or gender bias typically are not considered sexual harassment.

3.0 RESPONSIBILITIES

All employees are responsible for preventing and reporting acts of discrimination and harassment in the workplace.

3.1 Management

- Ensure that this policy is applied in a timely, consistent and confidential manner;
- Determine whether or not allegations of discrimination and/ or harassment are substantiated;
- Determining what corrective action is appropriate where a harassment complaint has been substantiated;
- Consult with Joint Health & Safety Committees (JHSCs), or the health and safety representative respecting the development and implementation of policy and procedures.
- Ensure an employee reporting an injury or adverse symptom resulting from an incident of harassment, is advised to consult a health professional of the employee's choice for treatment or referral.
- Ensure there is no interruption to pay or benefits where the employee has been referred for treatment by a physician.
- Review workforce data analyses- patterns of exclusion and inclusion- types and frequency of complaints to identify possible systemic discrimination issues for follow up.
- Make necessary adjustments to ensure that this policy meets the needs of the Dexterra Group.
- Foster a harassment free work environment and setting an example about appropriate work behavior.
- Conduct themselves in an appropriate manner, not condone or participate in any harassment, and be alert to instances of harassment.
- Communicate the process for investigating and resolving harassment complaints made by employees
- Be vigilant. Dealing with discrimination and harassment situations immediately upon becoming aware of them whether or not a harassment complaint has been made
- Take appropriate action during a harassment investigation including separating the parties to the complaint when appropriate; and
- Ensure harassment situations are dealt with in a sensitive and confidential manner.

3.2 Employees

Employees are expected to:

- Treat all people fairly and with dignity
- Speak up against discrimination and harassment
- Report harassment. Advise your manager or supervisor if you witness or experience harassment
- Cooperate with a harassment investigation and respect the confidentiality related to the investigation process

Employees can expect:

- To be treated with respect in the workplace;
- That reported harassment will be dealt with in a timely, confidential and effective manner;
- To have their rights to a fair process and to confidentiality respected during a harassment investigation;
- To be protected against retaliation for reporting harassment or cooperating with a harassment investigation

4.0 PROCEDURE / LINKS

4.1 Complaint Procedure

Any person who believes he or she is being treated in a manner not consistent with this policy should immediately make their objection clearly known to the offender and ask the offender to stop. Assistance with this issue is available from the person's immediate supervisor or, if unable to report to the immediate supervisor, from Human Resources.

- a) Any person who believes they are being treated contrary to this policy should keep a written record of the nature of the alleged violation, date(s), time(s), factual and objective description of behaviour(s), actions taken, and names of witnesses or of those who intervened, if any. In all cases, a complaint should be initiated within a reasonable timeframe before incidents can accumulate or escalate in severity.
- b) If the behaviour continues, or if the person is not willing or able to confront the person directly, the person* should make a complaint, as soon as possible, to any of the following:
 1. Their own immediate supervisor or
 2. Human Resources.

*A contractor or relevant third party making a complaint will do so to the Dexterra Group management person to whom they are accountable for the project. Similarly, a person covered under the scope of this policy making a complaint against a relevant third party outside of the scope of this policy may raise it at this juncture.

An employee is not required to follow the formal chain of command when filing or expressing any issue of concern regarding alleged discrimination or harassment. If an employee experiences any form of job-related harassment, whether or not, it is based on any of the prohibited grounds or believe that they have been treated in an unlawful or discriminatory manner, they should report the incident immediately to their manager. All complaints will be kept confidential to the maximum extent possible. An initial report may be verbal or written, whether pursuant to this policy or HR-POL013.

Although reports of sexual or discriminatory harassment maybe made verbally, employees are strongly encouraged to make such reports in writing. Written reports of harassment assist the investigation process. The written complaint should set out the following:

- The nature of the complaint – harassment, failure to accommodate etc.;
- Names of the respondent(s), including persons who may have been in a position to act and failed to do so. Managers have a particular responsibility and liability for ensuring that the

- workplace is free of discrimination and harassment;
- The incident(s) and actions that are the basis of the complaint, including dates;
- The resolution being sought; and
- Witnesses

Complaints should be made as soon as possible but no later than within three months of the last incident of perceived harassment, unless there are circumstances that prevented the employee from doing so.

The person receiving the complaint will contact Human Resources directly to seek guidance on how to initiate an informal investigation with the Complainant, with a view to resolving the complaint at an early stage by following HR-POL013 Complaint Resolution Policy.

The Complainant shall first follow the less formal HR-POL013 Complaint Resolution Policy to attempt resolution of their complaint.

If no formal resolution is reached through HR-POL013, then the Complainant may request a formal investigation. The request must be in writing and should set out the nature of the complaint, the names of the respondent(s) and any witnesses, details of the incident(s), including dates, the resolution being sought, and any other relevant documents or information.

This policy is not intended to prevent an employee from exercising rights pursuant to any other law including Human Rights legislation, which includes the right to request a formal investigation.

4.2 Formal Investigation

No complaint will be regarded as substantiated until it has been properly investigated.

Dexterra Group reserves the right to assign the appropriate person(s) to investigate or hire an external third-party investigator. The Complainant, the Respondent(s) person alleged to have violated this policy, as well as any witnesses will be interviewed in the course of the investigation to the extent possible. Written notes of these interviews will be made and retained. The Complainant and Respondent(s) may also provide the investigator with relevant documents and evidence to review. While the investigation process is confidential, sufficient detail may need to be disclosed to appropriate parties in order to properly investigate the complaint and provide parties with a reasonable opportunity to respond.

The primary goal of the investigation is to understand each person's position/perspective in an endeavour to develop an agreement between the Complainant and the Respondent(s) about future working relationships. If this is not possible, the investigator will prepare a report summarizing the investigation, including evidence gathered, findings of fact, and conclusions.

At the conclusion of the investigation, Dexterra Group will take appropriate action within a reasonable time frame. Dexterra Group shall ensure that the Complainant and the Respondent(s), if an employee of Dexterra Group, are informed in writing of the results of the investigation within a timely manner, as well as any corrective action that has been taken or that will be taken as a result of the investigation, subject to confidentiality requirements. In appropriate circumstances, employees may be referred to employee assistance programs. Disciplinary sanctions will be imposed for violations of this policy, as appropriate, up to and including termination of employment or termination of the contractual relationship.

4.3 Appeal procedure

If the complainant or the person alleged to have violated this policy is not satisfied with the outcome of the investigation, she/he (the appellant) may pursue any of the following courses of

action:

- a) Request, in writing, to the Employee Relations and Labour Relations Director (ER/LR), that the decision be reconsidered, such request to include the reasons for the request and outcome sought. The ER/LR Director will cause a review to be conducted and will respond in writing to the appellant; or
- b) File complaint/action in accordance with provisions under appropriate legislation.

4.4 Confidentiality and Record Keeping

Confidentiality will be maintained to the extent possible, recognizing that disclosure of information is required in the investigation process. Information disclosed to the Respondent must contain sufficient detail to allow an informed reply by the Respondent but does not usually or necessarily include the disclosure of documents/reports submitted by the Complainant.

Dexterra Group will retain records of the investigation including copies of the complaint, interview notes, and investigation report (if any). Records will be kept confidential and retained for at least one year and in accordance with applicable privacy legislation.

Unauthorized disclosure of information and documents is prohibited and may be subject to disciplinary action up to and including termination of employment.

4.5 Reprisals

There shall be no reprisals taken against a person making a complaint in good faith. Knowingly making a false complaint, however, is itself a violation of this policy and will have consequences as outlined in the investigation section above.

4.6 False Accusation

Dexterra Group recognizes that false accusations of discrimination, bullying or harassment have serious effects on innocent individuals. If an investigation reveals that a complainant deliberately or maliciously filed a false complaint, the complaint will be deemed to be harassment and dealt with under this Policy. A false accusation is different than the inability to substantiate discrimination, bullying or harassment by the complainant. If, for whatever reason, the complaint cannot be substantiated and was not maliciously invented, the complainant is not subject to reprisal. Complaints made frivolously or in bad faith and without factual basis may constitute defamation and may be actionable by the respondent. Such complaints may result in disciplinary action of the complainant, up to and including dismissal for cause.

5.0 POLICY REVIEW

This policy will be reviewed as required by Joint Health and Safety Committee or at least annually.

6.0 ACKNOWLEDGMENT

I acknowledge, understand, and have read the Harassment Free Workplace Policy, HR-POL003	
Employee Signature	

Dexterra Group reserves the right to amend, modify, suspend or terminate any of its programs (including benefits) and policies covering employees and former employees, including retirees, at any time, including after employees'



**HARASSMENT FREE WORKPLACE POLICY
HR-POL003**

retirements, without notice by action of its Senior Leadership Team or other committee expressly authorized by the Senior Leadership Team to take such action. The programs, benefits and policies to which an employee or former employee, including retiree, is entitled are determined solely by the provisions of the applicable program, benefit or policy as amended from time to time.