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<b>Policy Title:</b>	<b>Workplace Harassment and Violence Prevention Policy (Respect in the Workplace Policy)</b>
<b>Policy Number:</b>	<b>PO ACC D6</b>
<b>Date Effective:</b>	<b>July 1, 2022</b>

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## Workplace Harassment and Violence Prevention Policy (Respect in the Workplace Policy)

### Purpose/Mission Statement

Algoma Central Corporation (“Algoma” or the “Company”) is committed to providing and maintaining a work environment based on respect for the dignity and rights of everyone in the organization. It is Algoma’s commitment to provide a healthy, safe work environment that is free from any form of harassment or violence. Such behaviours will not be tolerated, condoned, or ignored.

### Scope

This policy applies to all employees, contractors, and consultants engaged in work-related activities or work-related relationships. This policy applies in any location in which these individuals are engaged in work-related activities.

### Definitions

**Harassment and Violence** Under this policy, harassment and violence includes any action, conduct, or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation, or other physical or psychological injury or illness to an employee, including any prescribed action, conduct, or comment.

Although harassment is often a series of incidents, it can also be a single incident if it meets the above definition.

**Discrimination** Workplace discrimination includes any form of unfavourable treatment, including distinction, exclusion, or preference based on prohibited grounds in the applicable human rights legislation, including the *Canadian Human Rights Act* for federally regulated employees, which nullifies or impairs equality or opportunity in employment or equality in the terms and conditions of employment.

### Prohibited Grounds (*Canadian Human Rights Act*)

Prohibited grounds under the *Canadian Human Rights Act* include race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family

	status, genetic characteristics, disability, and conviction for which a pardon has been granted or in respect of which a record of suspension has been ordered.
Workplace	Any place where an employee is engaged in work for the employee's employer.
Notice of Occurrence	The term used to refer to an internal complaint of harassment or violence.
Occurrence	An occurrence of harassment or violence in the workplace.
Designated Recipient	A work unit in the workplace or person designated by the employer to receive notices of occurrences of workplace harassment or violence. Algoma's Designated Recipient is the Vice-President, Human Resources, for shoreside notices; and the Assistant Vice-President, Marine Operations & Fleet Personnel for shipboard notices, who may in turn appoint a trained member of their respective teams to perform the required duties under their supervision, all with the assistance of Sr. Corporate Counsel if required.
Complainant	The person, principal party, who is the object of an occurrence.
Respondent	The person, responding party, alleged to be responsible for the occurrence.
Witness	A person who witnessed an occurrence or is informed of an occurrence by the principal or responding party.
Applicable Partner	The policy committee or in the absence of one, the workplace committee or health and safety representative.

**Appendix A** provides examples of what does and does not constitute the various forms of harassment and violence described above.

## **Policy Guidelines**

### **4.0 Preventing Harassment and Workplace Violence**

- 4.1 It is our mutual responsibility to ensure that we create and maintain a workplace free from violence and harassment. For further details on specific roles and responsibilities please refer to **Appendix B**.
- 4.2 Algoma will do its part by not tolerating or condoning any discrimination or harassment or any threat or act of violence.

This includes making everyone in the Company aware of what behaviour is and is not appropriate, investigating Notices of Occurrence, and imposing suitable corrective measures.

- 4.3 Algoma has a Workplace Harassment & Violence Prevention Program in place.

As part of this program, risk assessments have been conducted to determine the level of risk associated with the work performed by our employees. If, through the assessment program, particular locations or positions are identified as higher risk, employees associated with these locations or positions will be provided with training specific to the risks identified. Risk assessment documents and forms are located on ShipNet.

While risk assessments have been conducted and controls have been put in place to control the associated risks, employees are always encouraged to voice their concerns and make suggestions on how to further prevent workplace harassment and violence from occurring.

- 4.4 This program also incorporates training and communication to educate employees on workplace harassment and violence, including prevention and reporting. Employees when first hired will be trained on harassment and violence identification and prevention, the content of this policy, and action to take if they believe they are the subject of harassment or violence. Following this initial training, employees will be provided with similar training every three (3) years.

Designated Recipients, Internal Investigators and Applicable Partners are also required to be trained on their roles and responsibilities under this policy and receive specific training to ensure they are able to fulfil their roles in a competent manner.

- 4.5 All employees must do their part by ensuring that their behaviour does not violate this policy and by fostering a work environment that is based on respect and is free of harassment, discrimination, and violence. When an alleged violation of this policy occurs, this policy outlines the steps in place to provide resolution.

## 5.0 Resolution Process

The following steps form the resolution process for occurrences of harassment and violence.

### **Step 1 – Inform the Person Their Behaviour is Unwelcome/Unwanted**

- 5.1 If an employee believes they are subject to behaviour that does not comply with this policy or witnesses such behaviour, the first thing to do, if comfortable, is to inform the person, either directly or in writing, that the behaviour is unwelcome and/or unwanted. This is best done as soon as an individual receives any unwelcome comments or conduct. Although this may be difficult to do, telling the person their actions are not well received is often enough to stop the behaviour.

Some of the things you can say that might stop the behaviour include:

“I don’t want you to do that.”

“Please stop doing or saying...”

“It makes me uncomfortable when you ...”

“I don’t find it funny when you ...”

**Step 2 – If Unresolved, File a Notice of Occurrence Report**

- 5.2 If the complaint is not resolved in the above manner, the employee should complete a Notice of Occurrence Report (available in ShipNet Forms and Employee Self-Service) and provide it to the Designated Recipient. If appropriate, the employee should include their immediate supervisor in copy. If the immediate supervisor is the subject of the complaint (Respondent) then the employee should report the incident to their supervisor's manager instead.

If the employee is unable to complete the form, they may verbally provide the information to the Designated Recipient or their supervisor who will then complete the form on their behalf and have them sign it.

In order to proceed with the resolution process, it is mandatory to provide a name or identity of the Complainant involved in the occurrence. If the name or identity is not provided, the occurrence will not be reviewed any further.

It is important to complete and submit the Notice of Occurrence Report as soon as possible so that the problem doesn't escalate or happen again. Once a complaint is received, the resolution process will be initiated.

As an alternate option, a complaint can be filed through Algoma's secure and confidential reporting system, ClearView via the following methods. However, it is the preference that a complaint is submitted as described above so the employee's supervisor is aware of the complaint as soon as it is submitted.

- Online through the website [www.clearviewconnects.com](http://www.clearviewconnects.com)
- By telephone at: 1-866-846-7659
- By mail at:  
ClearView Connects  
P.O. Box 11017  
Toronto ON M1E 1N0

Additionally, if an employee wishes to make a complaint pursuant to subsection 127.1(1) of the *Canada Labour Code*, such a complaint may be made directly to Cathy Smith, Vice-President, Human Resources, for shoreside employees and to Joshua Juel, Assistant Vice-President, Marine Operations & Fleet Personnel, for shipboard employees.

**Step 3 – Initial Meeting**

- 5.3 The Designated Recipient will promptly organize an initial meeting or conversation with the Complainant. In the case of a witness giving notification of an incident, the person who is allegedly the Principal Party of the behaviour will be contacted.

During the initial meeting or conversation, the Designated Recipient will outline the policy, including its confidentiality and anti-reprisal provisions; and will explain the various options available for resolving the complaint informally or formally, including seeking input from the Complainant to identify relevant informal resolution options that would be acceptable to them, as appropriate. Support resources, such as the Employee and Family Assistance Program, will also be discussed.

The Designated Recipient will immediately determine whether any interim protective measures are reasonably required in order to ensure the protection of any employee(s). Interim protective measures may include but are not limited to: relocating any of the relevant parties to a different worksite/vessel, placing one (1) of the parties on paid or unpaid leave, implementing an alternative reporting relationship, etc.

#### **Step 4 – Determining Resolution Process**

- 5.4 The Designated Recipient will determine which process, formal or informal, is appropriate.

The Complainant will be asked to consider whether they wish to pursue an informal or formal resolution process, and this choice will be respected to the extent possible.

In cases where alternate dispute resolution methods, such as facilitation or mediation, are appropriate, all parties will be expected to consider using such methods and make reasonable efforts to resolve the situation through these means.

Informal process: In some cases, a formal investigation may not be necessary. For example, an informal process may be sufficient when simply having someone speak to the Respondent on behalf of the Complainant or holding a facilitation meeting prompts the Respondent to realize the behaviour in question is not welcome and to commit not to engage in similar behaviour in the future and/or to other corrective and/or restorative measures. When the Respondent does not challenge the allegations made by the Complainant and is willing to cease the behaviour and a resolution acceptable to both parties is reached (an apology, training, etc.), it may not be necessary to conduct a formal investigation. Possible informal resolution outcomes may include but are not limited to:

- facilitation or mediation;
- training;
- a verbal or written apology;
- reorganization of the reporting structure or working relationship;
- regular follow-ups with the Complainant in order to ensure that the behaviour has ceased; or
- a combination of the above or any other resolution outcome agreeable to all.

Formal process: An informal resolution process may not always be appropriate. For example, this may happen when the Respondent does not agree with the factual allegations made against them or disputes that the behaviour was inappropriate under the circumstances, or the principles of procedural fairness otherwise require a formal investigation. A formal investigation may also be required in light of the seriousness of the allegations.

After the investigation is completed, the Complainant and the Respondent will be advised of the results and of any corrective action that has been taken or will be taken as a result of the investigation.

If, after an investigation, a complaint is found to be substantiated, the employer will implement corrective and/or restorative measures in order to ensure a workplace free from harassment, violence, and discrimination, and in an effort to prevent a

reoccurrence of the incident(s). These measures may be disciplinary, non-disciplinary, or both, depending on the circumstances. They may include, but are not limited to:

- an oral or written apology;
- coaching or training;
- restructuring of reporting relationships or duties;
- disciplinary action up to and including termination; or
- any other appropriate measures or a combination of the above.

**Step 5 – Implementing the informal resolution process, if applicable**

5.5 When appropriate, parties are offered mediation/facilitation services. These services will only be pursued with the consent of both parties. The Designated Recipient will explore the various possible resolution outcomes with the parties (together or separately, as appropriate), including input from the parties identifying any other relevant resolution options that would be acceptable to both parties.

Mediation/facilitation is voluntary and confidential. It is intended to assist the parties to arrive at a mutually acceptable resolution to the complaint. The mediator/facilitator will be a neutral person, agreed upon by both parties. If both parties agree, the Designated Recipient can act as mediator/facilitator.

If the process is successful in resolving the complaint, the Designated Recipient ensures that any agreed upon corrective and/or restorative measures are implemented.

Discrimination, harassment, and workplace violence are serious matters. Therefore, even if the Complainant decides not to make a formal complaint, an investigation into the matter may still occur and steps may be taken to prevent further harassment. For example, an investigation may need to continue if the allegations are serious or if there have been previous complaints or incidents involving the respondent.

**Step 6 – Implementing the formal resolution process, if applicable**

5.6 A formal investigation will proceed any time the Complainant requests a formal investigation into the occurrence, when the Designated Recipient determines a formal investigation is necessary, or when an informal investigation was unsuccessful in resolving the matter.

The Designated Recipient will send a written notice to the Complainant and Respondent to advise them that a formal investigation will be conducted.

The Designated Recipient, in consultation with the Applicable Partner will determine who will investigate the occurrence. Depending on the nature and severity of the complaint, an Algoma representative may conduct the investigation or a 3<sup>rd</sup> party Investigator selected by the Designated Recipient and members of the Applicable Partner will be appointed. If there is no agreement within sixty (60) days after the day on which the notice is provided, a person from among those whom the Canadian Centre for Occupational Health and Safety identifies as having the knowledge, training and experience will be selected.

It is expected that all employees involved in the investigation process cooperate fully and maintain confidentiality at all times even after the matter is concluded.

- 5.7 Once the investigation is complete, the Investigator will prepare a detailed report of the findings. A summary of the findings will be provided to the Complainant, the Respondent, and members of the Applicable Partner. The report will only deal with the facts and will not directly identify those involved.
- 5.8 Prior to the conclusion of the investigation, the Company may initiate preventative actions in an effort to control any risk or potential future risk associated with the incident.
- 5.9 If a finding of harassment or workplace violence is made, Algoma will take appropriate corrective measures, which could include disciplinary action up to and including termination. The Company may take into consideration the findings in the Investigator's report when determining if disciplinary measures are warranted and what those measures should be. However, disciplinary measures will also depend on a variety of other factors to be considered during the Company's administrative review. Specific disciplinary measures will not be shared with other parties involved in the occurrence or the Applicable Partner.
- 5.10 If the Report contains general recommendations and improvements to prevent future occurrences, the Company will review those recommendations with the Applicable Partner to determine which of those recommendations the Company will implement. Under normal circumstances, those recommendations will be implemented within a year of receiving the Notice of Occurrence.

## 6.0 Representation

- 6.1 At any time during the investigation, an employee may be accompanied by a support person of their choice which, in the case of a unionized employee, will be their union representative whenever possible. The support person is there to provide moral support, not to speak on behalf of the Complainant or Respondent. The support person cannot be another Complainant or Respondent, or someone who is or may be a witness during the investigation.

## 7.0 Emergency procedures

- 7.1 If a harassment and violence occurrence poses an immediate danger to the health and safety of an employee, or if there is a threat of such an occurrence, please call 911 for emergency services (police, fire and ambulance) and notify your supervisor/manager immediately.

For additional support, Employees can also contact the Employee and Family Assistance Program (EFAP) at 1-844-880-9137 or go to their website at <https://www.workhealthlife.com>.

Below is a summary of the emergency procedures for various types of situations.

## **7.2 Violence in the Workplace**

If you witness or experience violence at work:

- remove yourself from the situation if you can
- inform your manager or seek help from a co-worker immediately
- if your manager is the perpetrator, notify another manager in the line of authority
- if your physical security or well-being is threatened, press your panic button (if available) and if possible call 911

If you are dealing with a potentially violent person:

- stay calm
- try to calm the other person or defuse the situation (if you can)
- avoid saying or doing anything that could aggravate the situation
- avoid eye contact or sudden movements that can be perceived as threatening
- respect the person's personal space
- continue the conversation with the person only if the person calms down
- tell the person that you understand the reason for their anger
- if the behaviour persists, end the conversation
- politely notify the person that you will leave the work area or ask them to do so
- notify your manager or seek help from a co-worker immediately (use the panic button if necessary and available)
- if the person refuses to leave the premises and the situation escalates, call 911

## **7.3 Active Shooter**

If you witness an incident involving an active shooter outside the building:

- stay out of sight (away from windows) and warn colleagues, clients, and visitors
- leave the area at risk
- when safe to do so, call 911 and other building occupants
- if you cannot evacuate the building safely, lock outside doors and close the blinds and curtains
- wait for instructions from first responders

If you witness an incident involving an active shooter inside the building:

- stay calm
- if you can do so safely, leave the area immediately
- warn others, as many as possible, without attracting the attention of the assailant
- if you can do so safely, call 911 and other building occupants
- lock the doors or barricade yourself in a room using furniture



- block the windows, close the office blinds and curtains
- if the workspace has no door, hide under a desk/table or where you cannot be seen
- if you are in a washroom, remain there, if safe to do so
- silence your cellphone, turn off radios and computers
- if you cannot escape, remain silent and hide until first responders arrive
- wait for instructions from first responders

#### 7.4 Bomb Threat

If you are made aware of a bomb threat by telephone:

- listen to the caller calmly and do not interrupt them
- try to get as much information as possible, such as:
  - when the bomb is supposed to explode
  - where the bomb is located
  - description of the device
  - reason for the call or motivation for the threat
  - telephone number on the display screen (if possible)
- remember any details you can about the caller, such as:
  - approximate age
  - gender
  - accent
  - level of nervousness
  - any background noise
- call 911 and inform your manager
- follow instructions. Managers and/or law enforcement will assess the situation and provide guidance regarding shelter-in-place or evacuation.
- if no guidance is provided and you feel you are in immediate danger, calmly evacuate the area. Distance and protective cover are the best ways to reduce injury from a bomb
- remain available to provide information to first responders

If you are made aware of a bomb threat by email:

- save the email (or letter)
- send it immediately to your Department Manager (staff) or Captain (crew)
- follow instructions. Managers and/or law enforcement will assess the situation and provide guidance regarding shelter-in-place or evacuation.
- if no guidance is provided and you feel you are in immediate danger, calmly evacuate the area. Distance and protective cover are the best ways to reduce injury from a bomb

If a bomb alert is activated (for example, over intercom):

Shipboard employees should refer to the Vessel Security Plans for details and action steps. Ship specific procedures, functions and roles are in accordance with marine security regulations.

All other employees should follow the steps outlined below:

- visually inspect your immediate work area including:
  - wastepaper baskets
  - storage areas
  - dislodged suspended ceiling panels
  - furniture that has been moved
  - closets
- inform your manager of the results of your search
- if you find a suspicious package, do not touch it and inform your Department Manager (staff) or Captain (crew)
- follow instructions as provided. Managers and/or law enforcement will assess the situation and provide guidance regarding shelter-in-place or evacuation
- if no guidance is provided and you feel you are in immediate danger, calmly evacuate the area. Distance and protective cover are the best ways to reduce injury from a bomb

### 8.0 Confidentiality

- 8.1 Algoma recognizes the sensitive nature of these complaints and all complaints will be kept confidential to the extent possible. Only information that is necessary to investigate and respond to the complaint will be released.
- 8.2 Out of respect for the relevant individuals, it is essential that the Complainant, Respondent, Witnesses, and anyone else involved in the formal investigation of a complaint maintain confidentiality throughout the investigation and afterwards.
- 8.3 While the Applicable Partner will be involved in selecting an Investigator and reviewing the report findings for general recommendations, the Applicable Partner will not be privy to the identities of those involved in an occurrence unless a member is a union representative of an employee involved. In such cases, although that individual may be aware of the identities, they will not disclose that to other Applicable Partner members.

### 9.0 Retaliation

- 9.1 The Company will not tolerate retaliations, taunts, or threats against anyone who complains about harassment, discrimination, or violence, or who takes part in an investigation. Any person who exhibits such behaviours in relation to a complaint may be disciplined up to and including termination.
- 9.2 If an individual makes a complaint in good faith and without malice, regardless of the outcome of the investigation, the individual will not be subject to any form of discipline. Algoma may, however, discipline or terminate anyone who brings a false and malicious complaint.

### 10.0 Care and Support

- 10.01 All employees who are exposed to workplace harassment, violence, or discrimination, or who are injured or negatively impacted as a result of workplace harassment, violence, or discrimination, are encouraged to consult a health care professional for treatment or referral.

10.02 Employees have access to confidential resources through the Employee & Family Assistance Program (EFAP). The EFAP is a 24-hour crisis and referral centre that can provide counselling and advisory services. It is completely confidential and free of charge. No one is obligated to seek help from the EFAP; however, the support that the program offers can help employees improve their personal situation.

For more information, please contact EFAP at 1-844-880-9137 or go to their website at <https://www.workhealthlife.com>.

10.03 Support and resources related to family violence are available at Ending Violence Canada - Support Services (<https://endingviolencecanada.org/shelters-transition-houses-and-support-services/>).

#### 11.0 Resolution Process Timelines

The timelines below will be adhered to whenever possible. If it is not possible to adhere to the timelines noted below, the person(s) responsible will advise the parties that an extension is required, what the revised timelines are, and the reasons for the delay.

11.01 Notices of Occurrence will be responded to within seven (7) days of receiving the notice.

11.02 The resolution process (formal or informal) will begin within forty-five (45) days after the day on which the Notice of Occurrence is received. If there is an immediate threat to a person's life or physical safety, interim measures may be put in place immediately.

11.03 The resolution process will be completed within one (1) year after the day on which a Notice of Occurrence is received.

#### **References**

Canadian Human Rights Act  
Canada Labour Code  
Work Place Harassment and Violence Prevention Regulations, SOR/2020-130

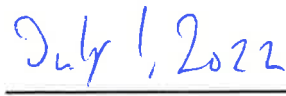
#### **Appendices**

Appendix A – Explanation of Various Forms of Harassment  
Appendix B – Roles and Responsibilities

#### **Approval**

Gregg Ruhl, President & CEO

  
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Signature

  
\_\_\_\_\_  
Date

**Approval Dates**

This policy originated on: July 16, 2013  
This version takes effect from: July 1, 2022  
This policy will be reviewed again by: January 1, 2024

**Policy Owner**

The following individuals can be approached if you have any questions or concerns in relation to this policy:

- Vice-President, Human Resources
- Assistant Vice-President, Marine Operations & Fleet Personnel
- Sr. Corporate Counsel

## **Appendix A**

### **Examples of Harassment, Violence, and Discrimination**

For greater clarity, examples of the types of behaviour that may constitute harassment, violence, or discrimination, and those that do not, are listed below. These are only examples and do not in any way limit or narrow the definitions of harassment, violence, and discrimination.

#### **Harassment**

Harassment can include, but is not limited to any of the following acts or attempted acts:

- spreading rumours or gossip about an individual or group
- cyber bullying (threatening, spreading rumours or talking negatively about an individual online)
- threats made over the phone, by email, or through other medium to an employee, including from an (ex)partner or family member
- making offensive jokes or remarks
- playing unwanted practical jokes
- socially excluding or isolating someone
- stalking or inappropriately following a person
- tampering with someone's work equipment or personal belongings
- vandalizing or hiding personal belongings or work equipment
- impeding a person's work in any deliberate way
- persistently criticizing, undermining, belittling, demeaning or ridiculing a person
- intruding on a person's privacy
- public ridicule or discipline
- unwelcomed physical contact
- sexual innuendo or insinuation
- unwanted and inappropriate invitations or requests, including of a sexual nature
- displaying offensive posters, cartoons, images or other visuals
- making aggressive, threatening or rude gestures
- misusing authority, including:
  - constantly changing work guidelines
    - restricting information
    - setting impossible deadlines that lead to failure, and/or
    - blocking applications for leave, training or promoting in an arbitrary manner
- engaging in any of the actions, conduct and comments outlined above against a person because of that person's:
  - race
  - national or ethnic origin
  - colour
  - religion
  - age
  - sex
  - sexual orientation
  - gender identity or expression
  - marital status
  - family status
  - genetic characteristics

- disability, or
- any of the other prohibited grounds that the Canadian Human Rights Act lists

**Harassment is not**

Harassment is not any of the following:

- consensual workplace banter and interactions (unless it includes hurtful remarks about others, especially if they pertain to any of the prohibited grounds listed above)
- reasonable management action carried out in a fair way, such as day-to-day actions by a supervisor or manager related to:
  - performance
  - absenteeism
  - assignments
  - discipline, and
  - even dismissal (unless it is abusive or discriminatory)
- although a workplace disagreement does not necessarily constitute harassment, if a conflict is poorly handled or left unresolved, it can lead to harassment

**Violence**

Violence can include but is not limited to the following acts or attempted acts:

- verbal threats or intimidation
- verbal abuse, including swearing or shouting offensively at a person
- contact of a sexual nature
- kicking, punching, scratching, biting, squeezing, pinching, battering, hitting or wounding a person in any way
- attack with any type of weapon
- spitting at a person

## Appendix B – Roles and Responsibilities

### Role of the Company

The role of the Company in relation to harassment and violence prevention includes:

- committing to preventing harassment and violence in the workplace
- jointly reviewing and, when necessary, updating this policy with the Applicable Partner at least once every three (3) years or following any change to an element of this policy
- jointly conducting an initial workplace assessment with the Applicable Partner
- jointly monitoring and, when necessary, updating the workplace assessment with the Applicable Partner when there is:
  - a change to the risk factors identified, or
  - a change in the effectiveness of the preventive measures that have been developed and implemented
- jointly developing, renewing and updating, when necessary, the emergency procedures with the Applicable Partner
- deploying the workplace emergency procedures whenever an incident, including an incident of family violence or domestic violence, poses an immediate danger to the health and safety of an employee or there is a threat of such an incident
- making available to all employees information related to support services
- jointly developing or identifying harassment and violence prevention training with the Applicable Partner
- delivering harassment and violence training to all employees and the Designated Recipient
- jointly reviewing and, when necessary, updating the training with the Applicable Partner at least once every three (3) years and following any change to an element of the training
- ensuring that the Designated Recipient correctly follows the resolution process outlined in the Work Place Harassment and Violence Prevention Regulations (the Regulations)
- for investigations into an occurrence of harassment and violence, providing a copy of the investigator's report to the principal party, responding party, and workplace committee
- jointly determining with the workplace committee which recommendations from the investigator's report should be implemented
- implementing the jointly determined recommendations from the investigator's report
- ensuring the resolution process is completed within one (1) year after the day on which a notice of an occurrence is received
- reporting to the Labour Program employee deaths resulting from occurrences of harassment and violence, within 24 hours of becoming aware of the death
- providing the Labour Program by March 1st of every year an annual report summarizing the data on all occurrences of harassment and violence in the previous calendar year
- complying with all other aspects of the Regulations and the Code as it relates to harassment and violence

### Role of Designated Recipient

The role of the Designated Recipient in relation to harassment and violence prevention includes:

- responding to all notices of an occurrence within seven (7) days of receiving the notice
- Beginning the resolution process (informal or formal) within forty-five (45) days after the day on which the notice of occurrence is received

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- reviewing every notice of an occurrence with the Complainant against the definition of harassment and violence outlined in subsection 122(1) of the Code
- making every reasonable effort to resolve an occurrence for which a notice has been provided
- allowing the Complainant and Respondent the option of participating in conciliation if they both agree to participate and on who will facilitate the conciliation
- providing notice of an investigation to the Complainant and Respondent
- in the case of an investigation, selecting a person to act as an investigator from the list of investigators developed jointly by the Company and the Applicable Partner
- ensuring selected investigators have the necessary knowledge, training and experience required by the Regulations
- ensuring investigators provide a written statement indicating they are not in a conflict of interest with respect to the occurrence
- providing investigators all the information that is relevant to their investigation
- providing regular status updates to the Complainant and Respondent on the status of the resolution process

### **Role of People Managers & Supervisors**

The role of the people managers and supervisors in relation to harassment and violence prevention at the Company includes:

- assist in creating a workplace by preventing and acting upon any offensive, violent, and/or harassing behaviour.
- immediately report to the Designated Recipient if they have received a Notice of Occurrence from an employee either verbally or in written form
- immediately respond to emergency situations in accordance with Company policies and procedures
- assist with the investigation as necessary
- assist with the implementation of recommended resolutions
- assist in the training and education of employees on this policy

### **Role of the Applicable Partner**

The role of the Applicable Partner in relation to harassment and violence prevention at the Company includes:

- jointly reviewing and, when necessary, updating this policy with the Company at least once every three (3) years or following any change to an element of this policy
- jointly conducting the workplace assessment with the Company and making recommendations to the Company regarding changes that should be made.
- jointly monitoring and updating the workplace assessment when a change to the risk factors is identified, a change to the effectiveness of the preventive measures that have been developed and implemented or at minimum every 3 years
- jointly developing the emergency procedures as well as reviewing and, when necessary, updating the emergency procedures with Company
- jointly identifying with the Company appropriate harassment and violence training
- jointly reviewing and, when necessary, updating the training with the Company at least once every three (3) years and following any change to an element of the training



- jointly developing a list of investigators with the Company
- where appropriate, checking in with the Company, if necessary, ensuring continuous compliance with the Regulations and the Code

**Role of employees**

The role of all employees in relation to harassment and violence prevention at the Company include:

- refraining from committing harassment and violence
- where appropriate and safe, informing a person committing harassment and violence that their actions are inappropriate and unwelcomed
- reporting all occurrences of harassment and violence to their supervisor or the Designated Recipient when they experience or witness it
- where appropriate, making every reasonable effort to resolve an occurrence of harassment and violence through negotiated resolution if they were a party to an occurrence
- cooperating with an investigator and the investigation process related to an occurrence
- refraining from retaliatory behaviour against the parties involved in an occurrence and any other individuals who are involved in the resolution process for an occurrence
- respecting the confidentiality of the information shared throughout the resolution process of an occurrence