

ANTI-HARASSMENT POLICY

"Harassment" is a serious, severe or pervasive conduct, that is unwanted or offensive that has the purpose or effect of violating a person's dignity or creating an intimidating, humiliating, hostile or offensive environment.

Unlawful discrimination and harassment (based on race, color, sex, pregnancy, age, national origin, religion, language, social origin, disability, genetic information, sexual orientation, veteran status, gender identity, trade union membership or other categories protected by applicable law) will not be tolerated. Discrimination also includes treating someone less favorably because they have submitted or refused to submit to such behavior in the past.

The following are examples of potential harassment:

- Continued suggestions for dating, romance, or social activity after it has been made clear that the suggestions are unwelcome
- Mocking, mimicking or belittling a person's disability or age
- Offensive or intimidating comments or gestures, or insensitive jokes or pranks that undermine the dignity of the person
- Outing or threatening to out someone as gay or lesbian
- Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic, social, linguistic or religious group, or gender.
- Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet)
- Shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity
- Stalking or persecuting a person with unwanted attentions, gifts, or messages
- Unwanted and inappropriate physical contact or horseplay, including touching, pinching, pushing, grabbing, unnecessary brushing against someone, invading personal space and physical or sexual assault
- Unwelcome sexual advances or suggestive behavior, and suggestions that sexual favors may further a career or that a refusal may hinder it

Persons may be harassed even if they are not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for them.

ANTI-BULLYING POLICY

"Bullying" is offensive, intimidating, malicious or insulting behavior involving the misuse of authority and power that makes a person feel vulnerable, upset, humiliated, undermined or threatened. "Power" does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal and non-verbal conduct.

The following are examples of potential bullying:

- Abuse of authority or power by those in positions of seniority
- Acts of physical or psychological violence
- Creation of arbitrary standards for one person, imposing unrealistic demands, micromanaging work, or using supervision to intimidate a person
- Deliberately excluding someone from meetings or communications without good reason, or encouraging others to do so
- Inappropriate, exaggerated or untrue derogatory remarks about someone's performance, particularly in front of others
- Physical or psychological threats against someone
- Sabotage of work
- Shouting at, being sarcastic towards, ridiculing or demeaning others
- Stealing credit for another's work

Legitimate, reasonable, and constructive criticism of a worker's performance or behavior, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

REPORTING A BREACH OF THIS POLICY

Everyone has a responsibility to help protect the organization's interests, reputation and to prevent unethical or unlawful actions from occurring. We realize that it is difficult to raise a sensitive issue, especially if it involves a co-worker or a situation in your workplace.

However, if you have any information about activities or behavior that conflict with or could be perceived to conflict with this policy or a law or regulation, you have a responsibility to notify your employer.

You should report the potential violation to either:

- The Human Resources Department
- The Legal Department
- An employee hotline

The organization maintains the greatest degree of confidentiality consistent with its legal obligations to follow up on complaints, including investigation, remedial action, and if required, reporting to appropriate enforcement agencies.

The organization prohibits acts of retaliation or victimization of individuals who seek to enforce their legal rights or the provisions of the policy. The organization may or may not take any action against you if you report violations in good faith. If a violation is found, the organization will take appropriate remedial action, which may include disciplinary action consistent with the applicable collective bargaining agreement or organizational policies and procedures.

Disciplinary actions are proportional, so they may vary from a verbal warning to dismissal or referral for criminal prosecution, depending on the state and/or country involved. Disciplinary actions are customarily private. If you suspect that you or someone else has been retaliated against or victimized for raising an issue under this policy, please contact the Human Resources or Legal Department or the employee hotline.

RESPONSIBILITY FOR THIS POLICY

The organization's executive officers have overall responsibility for the effective operation of this policy but have delegated day-to-day responsibility for overseeing its implementation Human Resources and management. All management personnel have a duty and specific responsibility to operate within the boundaries of this policy, take effective steps so that all employees understand the standards of behavior expected of them, and to take action when behavior falls below its requirements. Managers will be provided training in order that they may do so.

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