

PURPOSE

At Veresen Inc., every employee has the right to work in an environment that is free of harassment and violence, and where respectful and professional working relationships between all employees and contractors is the norm. Veresen Inc. recognizes that inappropriate behaviours compromise the integrity of the employment relationship and undermines an employee's self-respect and productivity.

The purpose of this policy is to prevent harassment and violence from becoming part of our workplace by increasing awareness, promoting the Company's fundamental values and beliefs and identifying processes for early intervention and resolution. All employees and contractors are expected to conduct themselves professionally, while considering the behaviours of others, based on the principles of reasonableness, respect and professionalism. These same principles are the basis for interpreting and applying this policy.

SCOPE

This policy applies to ALL employees and contractors of Veresen Inc. and/or its affiliates and any other businesses managed by Veresen Inc. and/or its affiliates.

POLICY STATEMENT

Veresen Inc. has no tolerance towards harassment or violence in the workplace. All reported or suspected occurrences of harassment or workplace violence will be promptly and thoroughly investigated. Allegations will be taken seriously and, if substantiated, addressed through appropriate measures, which may include disciplinary action, up to and including dismissal.

Definitions**(a) Harassment**

For the purpose of this policy, harassment is defined as any form of inappropriate conduct, comment, display, action or gesture by a person:

(i) That either:

- (A)** Is based on race, creed, religion, colour, sex, sexual orientation, marital status, family status, disability, physical size or weight, age, nationality, ancestry or place of origin; or
- (B)** Adversely affects the employee's psychological or physical well-being and that the person knows or ought to reasonably know would cause an employee to be humiliated or intimidated; and/or

(ii) That constitutes a threat to the health or safety of the employee.**(b) Workplace**

For the purpose of this policy, the workplace includes, but is not limited to, the physical work site, washrooms, cafeterias, training sessions, vehicles, business travel, field

locations, conferences, work-related social gatherings or any other place where the employee is required to be in service to the employer.

(c) Workplace Violence

Workplace violence is any attempted, threatened or actual conduct of a person that causes or is likely to cause physical injury.

(d) Complainant

The employee who has made a complaint of harassment or brings an incident of harassment to the attention of the employer.

(e) Respondent

The employee against whom a complaint has been lodged.

(f) Investigation

A fair and impartial fact-finding process to assess whether the allegation is founded, unfounded or made in bad faith.

(g) Bad Faith Complaint

Complaints made frivolously, maliciously, or without factual basis may constitute defamation, may be actionable by the Respondent, and may result in disciplinary action, up to and including dismissal.

Guiding Principles

As employees of Veresen Inc. we are collectively responsible for providing a work environment that is free of workplace violence and harassment and where individuals are treated with dignity and respect. Harassment and workplace violence undermine the integrity of the workplace and an individual's well being and will not be tolerated. Veresen Inc. is committed to:

- Building a work environment that is free of discrimination, harassment and workplace violence by ensuring its employment policies are implemented in a fair and equitable manner and are free of discrimination; and
- Creating an environment which enables all employees to contribute to their full potential, thereby increasing our business effectiveness and competitive advantage and providing employees with a positive, engaging and supporting work environment.

Inappropriate Behaviours

Inappropriate behavior can be any conduct by an individual that adversely affects an employee's psychological or physical well-being. Such behaviours can stem from a series of incidents *or a single incident depending on its severity*. It is comprised of acts that:

- Are demeaning, belittling, or can cause personal humiliation or embarrassment;
- Are threatening, intimidating and generally produce harmful results such as endangering a person's safety or negatively affecting their work performance or employment relationship;
- Create a hostile, threatening, or coercive work environment;
- Are offensive or insulting including comments, jokes, slurs, name calling, gestures, innuendoes, threats or taunting;
- Include displaying or distributing inappropriate posters, pictures, cartoons, graffiti, drawings, or other visual representations;
- Include yelling, use of profanity, making condescending or crude remarks at a person or persons;
- Include ostracizing or spreading gossip and spiteful rumours about a person or persons; or
- Use coercion or intimidation tactics when managing and monitoring a person's work.

It is important that these behaviours are brought to the attention of the individual perpetrating the action and/or the next level manager so that appropriate measures can be taken.

Harassment

Harassment is any conduct that is directed at a person or persons and the individual knew or should have reasonably known, to be unwelcome, inappropriate or offensive. Harassment can stem from a series of incidents or a single incident depending on its severity of the situation.

There are two forms of harassment that violate human rights legislation, including: a. Sexual harassment; and, b. Discrimination based on protected grounds. Disrespectful behaviours and harassment are not mutually exclusive in practice; the behaviours listed in the section above under "Inappropriate Behaviours" are considered harassment if based on sexual or protected grounds and adversely impact the employment relationship, an employee's work performance or their ability to advance through developmental opportunities.

(a) **Sexual Harassment**

Unwelcome sexual attention, advances or propositions, including sexually explicit or implicit comments about a person's body, attire or personal life;

- An implied or expressed promise of reward for complying with a sexually oriented request, or threat of reprisal or actual reprisal for refusing to comply with such a request;

- Displays and distribution of sexually suggestive photographs or materials in the workplace, especially those that cause insecurity, discomfort or humiliation or are considered to be offensive;
- Unwanted physical contact such as touching, patting, kissing or unnecessary closeness; or
- Sexual jokes or obscene remarks or gestures that cause awkwardness or embarrassment.

The defining characteristic of sexual harassment is that the conduct associated with it is *unwelcome or unwanted*.

(b) Discrimination based on Protected Grounds

This refers to harassment based on the following protected grounds identified under human rights legislation:

- Race
- Place of origin
- Colour
- Mental or physical disability
- Family or marital status
- Age
- Sexual orientation
- Ancestry
- Religious beliefs
- Gender
- Source of Income

What is not Considered Disrespectful Behaviour or Harassment

Harassment is a serious offense and must be distinguished from other forms of workplace behaviours that are entirely appropriate even though an individual or a group of individuals may find them annoying, stressful or cause them anxiety, frustration or unhappiness. The following are not considered to be harassment or bullying:

- The imposition of disciplinary measures in accordance with the Company's policies and procedures;
- The appropriate use of managerial authority in directing day-to-day activities that serve legitimate work-related purposes;
- Workplace stress and organizational changes.

Workplace Violence

Workplace violence is the threatened, attempted, or actual conduct of a person that causes or may cause physical injury or a fatality in the workplace. Examples of violence can include, but are not limited to:

- Physical attacks such as hitting, shoving, pushing or kicking;
- Verbal, written, or implied threats that express an intent to inflict harm;
- Threatening behaviours such as shaking fists, destroying property or throwing objects;
- Acts of domestic violence that evolve into the workplace; or
- Any other act that would arouse fear in a reasonable person in the same circumstances.

Any person who makes a threat, exhibits threatening behaviours, or engages in a violent act on Company property may be removed as quickly as possible taking into consideration the safety and legal aspects of the situation. Any person who is engaging in workplace violence may be suspended from entering company property pending the outcome of an incident investigation. People committing these acts outside of the workplace, but the results of which impact the workplace, are also violating this policy and will be dealt with accordingly. Threats, acts of violence and physical assault will be investigated. Possession and/or use of unauthorized personal firearms in the workplace is not tolerated.

Roles and Responsibilities

Maintaining a respectful, professional and harassment-free workplace is everyone's responsibility.

All Employee's

All employees are responsible for:

- Familiarizing themselves with the policy;
- Creating and supporting a harassment-free workplace through adherence to the policy; and
- Bringing any incident of harassment or potential harassment observed or that they are aware of to their immediate supervisor, and/or Human Resources.

All Manager's

All managers are responsible for:

- Familiarizing themselves with the policy;
- Ensuring a harassment-free workplace and adherence to the policy; and
- Stopping any harassment of which they are aware;
- Taking appropriate preventative or corrective action promptly and appropriately;
- Ensuring all employees' rights are respected;
- Supporting employees in the conflict resolution process; and
- Reporting incident(s) of harassment, witnessed and reported by others to Human Resources.

It is misconduct, subject to disciplinary action, for managers who are aware of workplace harassment not to take corrective action.

Employer/Human Resources

The Employer/Human Resources are responsible for:

- Ensuring employees are not exposed to harassment arising out of their employment;
- Implementing this policy and its related processes and procedures;
- Fostering a workplace free of harassment;
- Holding managers accountable for carrying out their responsibilities related to ensuring a harassment-free workplace and adherence to this policy;
- Communicating this policy to all employees;
- Determining if the complaint is founded, unfounded or made in bad faith; and
- Making decisions for follow-up action to complete the complaint process, which may include discipline, up to and including dismissal.

At any time during the process of handling a complaint where behavior of a criminal nature has occurred, or is thought to have occurred, the manager or employee subjected to this behavior must be informed that he/she has the opportunity to advance the complaint to the police for investigation. In cases where the employee has been afforded the opportunity to advance a criminal complaint but chooses not to do so, that choice should be respected except in circumstances in where there is an overriding concern on the employer's behalf.

Protection Against Retaliation

Retaliation is any adverse action or credible threat of adverse action taken by any manager or employee in response to another's participation in an investigation or report about harassment. Acts of retaliation include conduct that intimidates, coerces, penalizes or otherwise discriminates against those making or otherwise involved in a claim. Retaliation is strictly prohibited against anyone who has reported harassment or participated in the complaint process. Any signs of retaliation should be reported immediately to Human Resources. If it is deemed that retaliation did take place, the appropriate disciplinary action will result, up to and including dismissal.

Confidentiality

Allegations of workplace violence or harassment will be treated in a timely and sensitive manner, respecting the privacy rights of all parties involved. The employer will not disclose the name of a Complainant or Respondent or the circumstances related to the complaint to any person except where disclosure is necessary for the purposes of restorative or investigative processes, or as required by law. Information is shared on a "need to know" basis and must not be shared further. Failure to preserve the confidentiality of information acquired during the process may result in disciplinary action, up to and including dismissal.

Complaint Procedures

Any employee who feels that s/he has been or is being harassed OR who believes that s/he has witnessed harassment, should immediately report the situation to their manager or Human Resources. The report may initially be provided verbally, however, after further discussions, there may be a requirement for a more formal follow up written report outlining the detailed facts of the alleged harassment.

Complaint Withdrawal

A complainant may withdraw a complaint at any time. The employer may still be required to address the concerns raised in situations where:

- There exists a real or perceived threat to the health or safety of other employees;
- There is evidence that the complainant may have been threatened or may fear retaliation;
- Failure to resolve the matter might endanger an employee;
- The complaint alleges serious abuse of power; or
- Failure to follow through on a complaint would seriously damage the reputation of the company.

Resolution

Depending on the nature of the claim and the degree of severity, a number of options are available to bring resolution to the issue of disrespectful behavior or harassment.

(a) Direct Approach

Often, the best outcome results when the employee who believes they have been the subject of disrespectful behavior or harassment is active in resolving the issue themselves if they are comfortable in doing so. It is recommended that such employees first explain to the individual whose conduct is of concern why the behavior is unwelcome and ask him or her to stop. In many cases, the individual is unaware that their behavior is disrespectful or harassing and will change the behavior once they are made aware of its impact.

This approach is intended to empower employees to resolve the matter themselves without further escalation. Advice or coaching on how to handle an informal, direct resolution on your own can be sought by Human Resources.

(b) Intervention

If a Claimant is unable or unwilling to approach the Respondent directly, they may ask their manager or Human Resources for assistance in addressing the behavior by speaking with the Respondent on their behalf or being present to offer support when they meet with them.

Any intervention may also lead to:

- Mediation;
- Education or Training;
- Personal coaching through internal or external resources;
- A verbal or written warning.

In cases where it is appropriate for a 3rd party investigation, the recommendations as a result of the investigation could include:

- A transfer;
- A demotion;
- A suspension without pay; or
- Termination of employment.

A couple of months after the implementation of the resolution(s), Human Resources will conduct a follow up meeting with the Claimant and their manager (if appropriate), to ensure that the issues have been resolved.

Related Policies: Code of Business Conduct and Ethics Policy

APPENDIX**Formal Harassment Complaint**

1. Complainant Information:

PLEASE PRINT

Name: _____ Date: _____

Current Role: _____

Office Location: _____ Work Phone Number: _____

Immediate Manager: _____

2. Grounds for Complaint: On what grounds do you believe the harassment occurred (reference examples within policy or provide an alternate situation which you believe are grounds for harassment).
3. Respondent: Person you allege committed the harassment.
4. Details of the Complaint: Please be as detailed as possible when describing the inappropriate behaviours. Include items such as location, date, time circumstances surrounding the incident, any witnesses, what you have done in response to the behavior, etc. Attach additional pages if required.
5. Witness(s) of Alleged Harassment: Please provide name(s) and phone numbers of others who witnessed the alleged harassment.
6. Relevant Documents: Please attach copies of any documents you consider relevant.
7. Signature: By signing this complaint, you are agreeing to have a copy provided to the Director, Human Resources and the details of the alleged harassment to the Respondent. Your complaint will be maintained in confidence, however, relevant information will be shared to the extent necessary to determine the appropriate resolution of this matter.

Signature of Complainant_____
Date