



Workplace Violence and Harassment Policies and Plans

Stanley is committed to providing a healthy, violence and harassment-free work environment. All employees and contractors deserve a workplace in which all individuals respect one another and work together to achieve common goals. Stanley has established a zero-tolerance policy in an effort to eliminate workplace violence and harassment (including sexual harassment and domestic violence) of or by its employees, subcontractors, clients and public.

Workplace harassment means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought to know will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety. This includes conduct, comment, bullying or action based on race, religious beliefs, color, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, sexual orientation, and a sexual solicitation or advance.

Workplace Violence is defined as threats or the presumption of physical harm or mental torment towards any individual. Any violent contact whatsoever will be met with serious repercussions, which may include immediate termination and/or involvement of the local authorities.

In support of this policy, Stanley has established workplace violence and harassment prevention procedures. They include measures to protect workers from the hazard of violence and harassment and a process for employees to summon immediate assistance, report incidents or raise concerns. Stanley will investigate and take appropriate corrective actions to address all incidents and complaints of workplace harassment in a fair, respectful and timely manner. Stanley will ensure this policy and the supporting procedures are implemented, maintained and reviewed with employees at time of hire and corporate review of policy, procedure and form at least every three years.

The circumstances related to an incident of harassment will not be disclosed, or the names of the parties involved (including the complainant, the person alleged to have committed the harassment, and any witnesses) except where necessary to investigate the incident, to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, or as required by law.

No worker can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving harassment. This policy does not discourage a worker from exercising the worker's right under any other law (Canadian and provincial).

Signed:

Paul Gantar, P.Eng.

Stanley Construction Ltd.

President

Date:



PURPOSE

The goal of this procedure is to ensure the prompt, effective, and correct handling of workplace violence and harassment as required to the respective legislation where the work is being done. Stanley is dedicated to ensuring a safe workplace and this procedure is designed to ensure the prompt resolution of these situations.

SCOPE AND APPLICATION

This procedure applies to all Stanley employees, visitors and contractors. This procedure also applies to all worksites, employer/client provided camps and lodgings, employer/client provided transportation, regardless of location or time of day, employees and contractors are expected to maintain a high degree of respect and cooperation to other employees and the public at large.

ROLES AND RESPONSIBILITIES

Employer

Provide fiscal and human resources for the development, implementation, maintenance and monitoring of the prevention of workplace violence and harassment procedures.

- Comply with the applicable provincial legislation to ensure violence and harassment complaints and incidents are investigated with corrective actions implemented when necessary.
- The Project Manager has the authority to develop and oversee the program.
- The Project Manager in conjunction with senior management team will review and approve the policy and procedure in consultation with the Joint Health and Safety Committees (where applicable) and stakeholders annually and implement quality improvements as required.
- Maintain records of all workplace violence and harassment incidents.
- When required or requested, advise and support employees in seeking treatment by a health professional.

Supervisors

- Supervisors will take every reasonable precaution under the circumstances for the health and safety of workers and others working in the organization.
- Supervisors must ensure that none of the workers under the supervisor's supervision are subjected to or participate in harassment or violence at the work site
- Supervisors must intervene if a situation arises from a difference of opinion, work method or any other situation that can lead to violence or harassment in the workplace.

- Depending on the degree of tension, a verbal discussion or documented warning shall be the first resolution step taken, followed by management involvement and/or discipline or dismissal.
- Ensure that workers follow the procedure and that workers have the information needed to apply the reporting procedure.
- Receive the violence or harassment complaint and be open and responsive to the worker's concern and help the worker identify the specific problem, recognizing that it is in the best interest of all workplace parties to resolve the situation internally. This may include stop work at that worksite until the investigation is completed.
- Ensure the procedure is followed up correctly and where required corrective actions are identified, implemented and followed-up.
- Ensure that the worker is not reprimed e.g. no action, comment or process is initiated that may be considered by the employee as a threat, intimidation or coercion.
- Record time and details of the violence or harassment complaint and investigation using the Prevention of Violence and Harassment Form.
- Complete documents clearly and precisely and report the findings to next level manager.
- Actively involve the Senior Manager, Superintendent, Project Manager and when applicable, the HS Rep in all workplace violence and harassment incidents.

Employees

- Intervene and refrain from causing or participating in harassment or violence.
- Follow the prevention of workplace violence and harassment procedure.
- Understand the right to have a representative to assist you.
- Willingly participate in the workplace violence and harassment investigations.

DEFINITIONS

Workplace Harassment is an occupational health and safety hazard defined as:

- unwelcome conduct, comments, gestures or contact which causes offense or humiliation (e.g. name calling, harassing phone calls, spreading rumors);
- deliberate misgendering (i.e. referring to a person using terms or pronouns that do not align with the person's affirmed gender);
- physical or psychological bullying which creates fear or mistrust or which ridicules or devalues the individual (e.g. fist shaking, yelling);
- exclusion or isolation of individuals;
- intimidation (i.e. standing too close or making inappropriate gestures/comments);
- cyber bullying (e.g. posting or sending offensive or intimidating messages through social media or email);



- deliberately setting the individual up to fail (e.g. making unreasonable demands, setting impossible deadlines, interfering with work);
- intentionally withholding information or giving the wrong information;
- taking away work or responsibility without cause;
- displaying or circulating offensive pictures or materials in print or electronic form.

Workplace Violence is an occupational health and safety hazard defined as:

- physical attack or aggression (e.g. hitting, shoving, pushing or kicking a worker; throwing an object at a worker; kicking an object the worker is standing on, such as a ladder);
- threatening behavior (e.g. shaking a fist in a worker's face, wielding a weapon at work, trying to hit a worker, trying to run down a worker using a vehicle or equipment such as a forklift, destroying property or throwing objects);
- a statement or behavior that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker;
- verbal or written threats (e.g. verbally threatening to attack a worker, leaving threatening notes or sending threatening emails to express an intent to inflict harm on a worker);
- domestic violence; (A spouse or former spouse, current or former intimate partner or a family member may harm, or attempt or threaten to physically harm, that worker at work. In this example, domestic violence is considered workplace violence.)
- sexual suggestive actions, comments or violence.

CONTROL PLAN FOR WORKPLACE VIOLENCE

Everyone in the workplace must be committed to, and involved in creating, a workplace violence prevention program: management, supervisors, workers, and the Joint Health and Safety Committee (when applicable).

Employees are encouraged to participate in workplace violence assessments, personal surveys and to identify areas of perceived risk or concern associated with work assignments, to their supervisor or manager.

Domestic violence in the workplace:

- a) When there is a risk of domestic violence entering the workplace and employees are encouraged to recognize the signs.
- b) If there are concerns that any individual is at risk in your workplace it is your responsibility to inform your supervisor or manager. The company is then responsible to take appropriate actions to mitigate the threat.



Company employees are required to comply with all safety precautions that are made available to them.

Prevention measures may include; Communication devices to facilitate emergency calls - A workplace may include a land-line telephone, portable cell phone or other mobile device. Employees must be familiar with the communications system available and ensure that they know the number to call for emergency assistance. If an employee perceives an imminent threat of violence, they are required to contact 911 immediately.

Door locks – where an employee is working after hours alone in a Stanley work location, all exits should be locked and access restricted.

Sexual Violence in the workplace:

Sexual violence as a workplace hazard refers to any sexual act, attempt to obtain a sexual act, or other act directed against a worker's sexuality using coercion, by any person regardless of their relationship to the victim, in a workplace or work-related setting.

Sexual violence exists on a continuum from obscene name-calling to sexual assault and/or homicide. It includes online forms of sexual violence such as internet threats and harassment and sexual exploitation.

CONTROL PLAN FOR WORKPLACE HARASSMENT

Everyone in the workplace must be committed to, and involved in creating, a workplace harassment prevention program: management, supervisors, workers, and the Joint Health and Safety Committee (when applicable).

Employees will be trained in the definitions of workplace harassment, how to recognize the signs of danger, what to do about it and how to report the incident.

If a person is being harassed or is a witness to harassment at the workplace, they must report it to a supervisor immediately and an investigation will be initiated.

REPORTING PROCEDURES

When incident of violence or harassment occurs, the person subjected to an act of violence should immediately report the incident, so a formal investigation can be initiated.

Steps Prior to Formal Reporting:

- The victim should make his or her feelings known verbally to the alleged offender, directly or with the assistance of a third party clearly asking the offender to stop their actions.
- If the victim feels that their safety would be in danger to approach the alleged offender in the above manner, they should do this through their supervisor, management or safety advisor.



- It is very important that the alleged offender immediately be made aware that their conduct is offensive to the victim.

CONFIDENTIALITY

Stanley will respect the privacy of all concerned as much as possible and will not disclose the circumstances related to an incident of harassment or the names of the parties involved (including the complainant, the person alleged to have committed the harassment, and any witnesses) except where necessary to investigate the incident, to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, or as required by law.

It is the responsibility of any individual who becomes aware of an incident of violence not to disclose details of the incident to any third party without prior consultation with the victim.

All incidents of violence will be investigated in an objective and timely manner.

CONDUCTING AN INVESTIGATION

Incidents involving emergency and/or criminal activity will be referred to the local authorities for investigation.

Incidents that do not involve an emergency situation and/or criminal activity will be handled by the responsible Supervisor.

As the investigation could result in disciplinary action, the investigator must proceed in a manner that demonstrates objectivity, fairness, thoroughness and respect for confidentiality. The events of any reported incident must be supported by appropriate and accurate documentation, and all details are maintained in strict confidence.

When interviewing the involved parties and witnesses, it is important to speak calmly, speak clearly and non-judgmentally. Approach the interview in a sensitive, supportive manner. The goal of the interviews is to develop a true and accurate account of the incident. Use the incident statement

- a) Obtain the date(s)/time(s) of the violent incident.
- b) Find answers to the questions: who, what, when and where. Find out what specifically happened in this and other incidents
- c) Determine the background of the situation, including the relationship between the parties before the incident
- d) Obtain the names of anyone else who:
 - Saw or heard the incident
 - The person has talked with about the incident



- The person believes has also had encounters with alleged offender
- Find out what the person did in response to the violent encounter
- Find out whether the person has documented the incident, or any other violent encounters that the person has had with the alleged offender

e) Reassure the person that the Company is actively responding to the incident and that any retaliation from either party will not be tolerated.

f) When speaking with the alleged victim, communicate that the company must approach the alleged offender to discuss the incident objectively

g) When speaking with the alleged offender, keep in mind that the person is innocent until the investigation is complete and the allegations are proven true.

TRAINING AND RECORDS

The Supervisor must communicate this policy and procedure to employees upon orientation.

Managers and supervisors will communicate the any revisions to this procedure to their workers at staff meetings.

Records of these communications will be kept on file under the direction of the Project Manager and/or Senior Manager.