
 <i>"We are committed to the safety, health and well-being of our people and communities"</i>	<b>Policy</b>	
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	<b>Owner:</b> Director of Health and Safety	
<b>Title :</b>	<b>Workplace Harassment and Violence Prevention</b>	
<b>Signature :</b>  John Ferguson President & CEO		

### 1. Mission Statement and Objective

Purolator Inc ("Purolator") and its employees are committed to providing a safe and healthy workplace. We believe that harassment and violence, including sexual harassment and violence, has no place in our working environment. The objective of this policy is to help prevent such behaviour and resolve it when it is brought to our attention. This is a responsibility shared by everyone working at Purolator, and is both the right thing to do and consistent with the legal obligations of the Company and its employees.

### 2. Scope

This policy applies to all employees of Purolator, any agent performing work on Purolator's behalf and to the members of the Company's Board of Directors.

Under this Policy, a "workplace" means any place where an employee is engaged in work for Purolator. This includes Purolator facilities and vehicles, as well as any location where the employee is attending a business-related function at the direction of the Company or travelling in the performance of their duties.

### 3. What is Workplace Harassment and Violence?

For purposes of this policy, "harassment and violence" means 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.

This policy also prohibits harassment and violence based on any prohibited ground of discrimination under the *Canadian Human Rights Act*, namely race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

Harassment and violence can take the form of a series of occurrences that, taken together, amount to harassment and violence, or of a single, particularly serious occurrence.

Whether something constitutes harassment and violence under this Policy will be determined by the facts of each case. Examples of harassment and violence prohibited under this Policy can include inappropriate behaviour such as (but not limited to):

- Bullying (in person or online)

- Making threats, including threats of a sexual nature (directly in person, or indirectly through an intermediary or any method of communication including email and online message boards)
- Excluding other employees from work or social events with the intent of isolating them in the workplace
- Sexual harassment, such as:
  - Making jokes, comments or propositions with sexual overtones
  - Displaying sexually-charged images or pictures in the workplace, regardless of whether they are visible to other employees or not
  - Offering work-related incentives to an employee in exchange for sexual favours
- Gossiping about an employee's sexual history
- Sexual violence. For clarity, this includes any form of sexual assault as well as any touching of another employee's body in a manner having sexual overtones without their explicit consent. This includes touching any sexualized parts of the body and contact having sexual overtones with other parts of the body such as rubbing their shoulders or touching their hair without their explicit consent.
- Tampering with another employee's equipment or tools or intentionally impeding their work to demean or humiliate them
- Intentionally hitting or shoving another employee, with or without an object

The following additional examples do not constitute harassment and violence prohibited under this policy, provided it is done in a safe and respectful manner:

- Presenting your point of view, whether about work or issues outside of Purolator, even if not everyone in the conversation agrees with you
- Engaging in performance management with a subordinate
- Managing lateness or absenteeism
- Disagreements over how to manage the Company's personnel or operations, whether with subordinates, peers or your manager
- Disagreements over how to apply a provision of a Company policy or collective agreement
- Enforcing Company policies or directives
- Reprimanding an employee for a violation of Company policies or directives
- Providing coaching to a subordinate, even if that person does not agree it is necessary
- Conducting a disciplinary investigation or issuing corrective measures, including disciplinary measures

#### 4. Roles and Responsibilities

Under this Policy,

- As an **employer**, Purolator is responsible for implementing this policy and complying with applicable health & safety legislation on matters related to harassment and violence.
- **Employees** contribute to maintaining a safe and healthy workplace by taking responsibility for their own safety, complying with the behavioural expectations set out in this Policy, and ensuring they complete all training required by the Company.

Employees must also report all occurrences of harassment and violence to their immediate supervisor or Human Resources, cooperate with Purolator in the assessment or investigation of any alleged occurrence of harassment and violence, and comply with applicable health & safety legislation.

Any employee involved in the assessment or investigation of an alleged occurrence of

harassment and violence as a principal party, responding party or witness is required to keep confidential the names of other person involved and any information related to the case.

- The **designated recipient** is a person or department within Purolator that is responsible for the application of this Policy.

At Purolator, the designated recipient is the Chief Human Resources Officer. Responsibilities of the designated recipient can be performed by delegates acting on behalf of the designated recipient.

- The **policy health & safety committee, work place health & safety committee** or **health & safety representative** (depending on the location) is responsible for working jointly with Purolator under health and safety legislation regarding the prevention and resolution of harassment and violence, including establishing prevention and protection measures, training, identifying certain investigators suitable for looking into reports involving Purolator employees, and implementing investigators' recommendations when applicable.

## **5. Summary of the Resolution Process**

An alleged occurrence under this Policy can involve multiple parties. This includes:

- A "principal party", or person alleging to have been subject to harassment and violence;
- A "responding party", or person alleged to have engaged in harassment and violence; and
- A witness, or person having either observed an alleged occurrence of harassment and violence or otherwise having information relevant to its resolution.

An employee experiencing or witnessing an alleged occurrence of harassment and violence in the workplace should, after removing themselves from any situation involving immediate danger to their health and safety, report the issue to their immediate supervisor or a member of the Human Resources department. Such a notice of occurrence can be initially provided either in writing or verbally, but the employee may be asked to provide additional documentation or information in writing in support of their report.

After a notice of occurrence is received by Purolator, the resolution process available to the principal party can include the opportunity to resolve the matter through a negotiated settlement or conciliation, as well as the option to request an investigation.

A principal or responding party may choose to be represented in the resolution process.

## **6. Emergency Procedures**

If an occurrence of harassment and violence poses an immediate danger to the health and safety of an employee, or if there is a threat of such an occurrence, the employee must first remove themselves from the situation and, when safe, contact any local Purolator security staff or call 911 for emergency services (police, fire and ambulance).

When this can be accomplished without immediate danger to their health and safety, the employee should inform their immediate supervisor of the emergency. Employees can also contact the Employee and Family Assistance Program (EFAP) at 1 (844) 880-9137.

## **7. Confidentiality and Privacy**

Purolator is committed to safeguarding the confidentiality of the resolution process of a notice of occurrence under this Policy. To that end, any employee of Purolator engaged in the resolution process of a notice of occurrence, including any agent acting on Purolator's behalf, must not disclose the identity of an employee involved in the notice of occurrence as a principal party,

responding party or witness to anyone who does not require that information as part of their duties under this Policy.

If a principal party requests that the occurrence be resolved through an investigation, a report will be provided to the designated recipient, principal party, responding party and work place committee or health and safety representative (depending on location). That report shall not disclose the identity of any employee involved in the resolution process as a principal party, responding party or witness.

## **8. Training**

Purolator provides workplace harassment and violence prevention training as a mandatory course for all employees. This training is required to be completed successfully at least once every three years. This training notably covers the terms of this policy, including the definition of harassment and violence in the workplace, the roles and responsibilities of the individuals or teams involved in its application, a description of the resolution process applicable to alleged occurrences of harassment and violence, emergency procedures available to Purolator employees, and any other topics required under applicable law.

## **9. Risk Factors**

Several factors can contribute to workplace harassment and violence in the workplace. General risk factors, both internal and external to the workplace, can include client characteristics, work environment and job factors.

Purolator has identified a number of unique risk factors due to the nature of the work performed by its employees, such as delivering to and picking up from customers, operating a motor vehicle on public roadways, working in isolation, and customers entering Purolator retail locations. Such risk factors in our various work sites must be considered in work place assessments to develop appropriate preventative measures.

## **10. Review and Update**

This Policy must be jointly reviewed by Purolator and the Policy Health & Safety Committee at least once every 3 years and following any change to an element of the Policy.

Purolator and the workplace committee or the health and safety representative (depending on location) must jointly review and, if necessary, update a work place assessment if an occurrence of harassment and violence is not resolved through negotiated resolution, the principal party opts to end the resolution process and the responding party is not an employee of Purolator.

## **11. Protection against Reprisal**

Employees can report alleged occurrences of harassment and violence in good faith without fear of reprisal or retaliation. Any employee believing that they have been subject to any form of reprisal or retaliation as a consequence of having reported an alleged occurrence of harassment and violence in good faith or having participated in the resolution process for such an occurrence should report the matter to their immediate supervisor, a member of the Human Resources department, or to the designated recipient.

## **12. Support Measures**

Support for employees of Purolator is available through TELUS Health (formerly LifeWorks), Purolator's Employee and Family Assistance Program. Immediate and confidential services are accessible 24/7 by calling 1 844 880-9137 or visiting [purolator.lifeworks.com](http://purolator.lifeworks.com).

A TELUS Health professional consultant can help Purolator employees and their families:

- Stay safe and deal with feelings of worry, grief, and loss;
- Identify local and national resources that can help;
- Cope with disruptions; and
- Help find expert resources to help handle legal, financial, and insurance issues.

For urgent needs, employees should visit the TELUS Health's crisis response webpage. This page includes practical advice for coping with traumatic events, as well as a phone number to call for professional support and/or a referral to community resources.

Employees are encouraged to access the many resources available to them if and when needed, or to reach out to their immediate supervisor or a member of the Human Resources department.

### **13. Internal Complaint Resolution Process**

Alleged occurrences of harassment and violence in breach of this policy can be reported via:

1. Making the complaint to the employee's immediate supervisor, or
2. Making the complaint to a member of the local Human Resources Department, or
3. ClearView Connects Confidential Reporting:  
Hotline: 1-866-981-5597  
Website: [www.clearviewconnects.com](http://www.clearviewconnects.com)  
Mailing Address:  
ClearView Connects  
P.O. Box 11017 Toronto, ON  
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### **14. Non-Compliance**

Under this Policy, the following shall be subject to corrective action, including discipline up to and including termination:

- Failure to abide by behaviour standards and other requirements of this Policy;
- Engaging in any form of reprisal or retaliation against an employee for having reported an alleged occurrence of harassment and violence in good faith or having participated in the resolution process for such an occurrence; and
- Knowingly making false or vexatious reports of an occurrence of harassment and violence against another employee.

### **15. Other Recourse**

Recourses available to employees beyond this Policy can include those in their collective agreement (if applicable), the *Canada Labour Code*, the *Work Place Harassment and Violence Prevention Regulations* and the *Canadian Human Rights Act*.