



Harassment and Violence Prevention Policy

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Impact Electrical & Mechanical Ltd. (the “Company”) is committed to providing its employees and all of its contractors, customers, clients and visitors a work location(s) and work environment that is free from harassment, violence or threats of violence.

The law does not permit, nor will we tolerate, harassing or violent behavior of employees by other employees, or by contractors, customers, clients or other visitors to the workplace. Likewise, we will not tolerate harassing or violent behavior against a contractor, customer, client or visitor by any employee of the Company.

Under this policy, the Company will take all reasonable steps to identify risks and prevent harassment and/or violent acts that affect the personal safety and wellbeing of employees, contractors, customers, clients and members of the public who may access our workplace(s) or when our employees are working off-site. The Company will also take appropriate action to protect all persons from the effects of violent behavior.

Prohibited Harassment

Prohibited Harassment will include whenever a person:

- Engages in a course of vexatious comment or conduct against an employee/contractor/worker in the workplace that is known or ought reasonably to be known to be unwelcome.

Prohibited harassment is any behavior that interferes with an individual’s ability to do his or her job by creating an environment that is intimidating, hostile or offensive to the employee and can include a single event or course of comment or conduct. This will include harassment because of race, sex, sexual orientation, religion, creed, colour, national origin, ancestry, disability or medical condition, age or any other basis protected by federal, provincial or local law or regulation.

Examples of prohibited harassment will include:

- Verbal conduct such as epithets, derogatory jokes or comments or slurs;
- Unwelcome remarks, questions, jokes innuendo or taunting about a person’s body, sex or sexual orientation, including sexist comments or sexual invitations;
- Or unwanted sexual advances, invitations or comments; transmitting or display of derogatory and/or racially/sexually-oriented cartoons, pictures, drawings, posters or photographs;
- Leering, staring or making sexual gestures to anyone, regardless of sex of the person commenting and the recipient(s);
- Questions or comments about an individual’s sex life or sexual history or orientation;
- Display of pornographic or other sexual materials;
- Unwanted physical contact such as touching, patting, pinching or hugging;
- Intimidation, threats or actual physical assault of a sexual nature;

Workplace harassment will not, however, include properly discharged supervisory and management responsibilities including disciplinary action, management of performance and other conduct that does not interfere with a climate of understanding and respect for the dignity and worth of our employees.

Prohibited Violence

Prohibited violent acts will include any act of:

- Physical force by a person against a worker, in the workplace, that causes or could cause physical injury;
- Any attempt to exercise physical force against a worker in the workplace that could cause physical injury; and/or
- Any statement or behavior that it is reasonable for a person to interpret as a threat to exercise physical force against them in the workplace that could cause physical injury to the worker.

Examples of workplace violence will include:

- Any assault or physical attack, which will include fighting, punching, slapping, hitting, pushing, shoving, or kicking or any threat or attempt at such acts;
- The use of a weapon (including a knife or tool) or threatened use of any object as a weapon;
- Any threatening behavior such as shaking fists, throwing objects or physical confrontation or intimidation (such as crowding or cornering an individual);
- Horseplay;
- Stalking;
- Sabotage;
- Verbal or written threats.

Workplace

Prohibited behavior will be considered unacceptable when it occurs in or at the workplace and at or in connection with other work-related events, which will include business trips, social events with co-workers (whether or not the social event is sponsored by the company) and off-site training events.

Targeted Violence and/or Threats of Domestic Violence

The Company will take steps to plan for the unique safety and security requirements of employees who are the targets of violence, including from an abusive spouse or that otherwise arise from a domestic situation. The Company will take every precaution reasonable in the circumstances for the protection of such employee who is likely to be exposed to physical injury in the workplace from an individual who has a history of violence.

In this regards, the Company must have current knowledge and understanding of the safety, security and privacy needs of persons who may be experiencing such abuse or concern. The circumstances may include the spouse, partner, relative or acquaintance of a worker being threatened with violence and the possibility of an individual arriving in the workplace. While some disclosure of personal information could be necessary, it will be limited to what is reasonably necessary to protect the worker from physical injury. Any employee who has received a protection order preventing contact from or restraining access by another individual to the employee should immediately inform the Company of the “restraining” order, its content and terms and the identity of the individual being restrained.

If an employee, foreman, supervisor or manager becomes aware of a potential threat, reasonable precautions should be taken to safeguard all workers.

Reporting Conduct and/or Contravention of this Policy

If an employee feels that he or she is a victim of harassment or violence in the workplace or in the performance of their duties, or an employee observes harassment or violent behavior of another employee, contractor, client, customer or visitor, they should immediately report the incident to any foreman, supervisor or manager, regardless of whether the matter has been discussed directly with the individual(s) involved.

All employees are personally responsible for notifying local management of any actual or potential threats, verbal or physical, that they have witnessed, received or have been told that another person has witnessed or received. This includes threats by employees as well as threats by customers, contractors, clients or members of the public. All reports received must be documented. If local management is not available or if the employee would prefer not to report directly to management, employees should contact the Safety Manager and/or Human Resources or any other member of management.

When violent incident occurs, action must be taken to minimize its impact. Employees should respond to incidents of violence and must summon immediate security and health care assistance. Such assistance should include, but not be limited to, depending on the incident, involvement of foreman, supervisors or managers, contacting workplace and/or site security, emergency services, police and/or health services, directly or through 911. In the event of potential or actual injury, medical assistance must be contacted **immediately**. An inspector with the Ministry of Labour should be contacted and a written report provided as required by the *Occupational Health and Safety Act* in the event of a critical injury.

Employees who report and/or witness an incident should provide the following information:

- Date(s), time(s), and location(s) of the incident(s);
- Description of the incident(s);
- Name(s) of anyone present during each incident;
- Name(s) of anyone with whom the individual may have discussed the event.

Any Supervisor/Foreman who is aware of possible violence/harassment is required to immediately notify the Site/Office Manager, Human resources and/or Health and Safety Manager and document the incident/report. Supervisors/Foremen and Managers who observe or become aware of a breach of this Policy or receive complaints about behavior that violates this Policy or observe behavior that violates this Policy must report it immediately to the Office Manager/Human Resources and/or Health and Safety Manager.

Investigation

A thorough investigation of each complaint shall be conducted promptly and appropriate action taken. In the course of the investigation, each of the parties involved may be interviewed, as well as other individuals who may be able to provide relevant information and witness information. All information gathered during the investigation will be documented accurately and completely and will be kept confidential to the extent possible. While the Company will make every effort to be sensitive to privacy issues, including the identity and statements parties and witnesses involved, in the course of an investigation relevant information may have to be disclosed to other participants on a need-to-know basis and to facilitate a complete investigation.

A report which summarizes the incident and investigation and results will be completed, although it may not be disclosed. Any recommendations to address the matter in respect of the workplace policies and practices in the future will be completed and shared with the Joint Health and Safety Committee.

The Office Manager/Human Resources and/or Safety Manager will determine the parties authorized to investigate and resolve the complaint and shall monitor the investigation process.

Enforcement

Behavior that violates this Policy will be tolerated and could result in disciplinary action up to and including termination of employment.

Reprisals

Retaliation or reprisal or any kind, by any employee, foreman, supervisor or manager against any employee or individual who has filed or pursued a complaint under this Policy or has provided information or participated in an investigation regarding a complaint, is prohibited. Such prohibited acts of reprisal will result in disciplinary action up to and including termination of employment. Alleged retaliation or reprisals are subject to the same complaint procedures and penalties as complaints of harassment.

Malicious Reports

Where it is determined that a person has made a complaint in bad faith or with the intent to harm another person/employee and/or has misrepresented what is going on in the workplace, then formal disciplinary action may be taken against the person. Conduct based on mistakes or misunderstandings shall not constitute malicious conduct.