Workplace Psychological and Sexual Harassment and Violence Policy

Policy Statement

Global Mining Guidelines Group (GMG) is committed to providing a work environment in which all workers are treated with respect and dignity. Harassment in any form or violence will not be tolerated from any person at or outside of the work site including customers, clients, other employers, supervisors, workers, contractors and members of the public.

This policy outlines what workplace psychological and sexual harassment and violence are, how all workers have a role to play in its prevention, outlines procedures for dealing with any situations involving harassment or violence in the workplace and provides a process for workers to report incidents or raise concerns about the hazard of harassment and violence.

Guidelines

This policy applies to all employees (both permanent staff and contractors) of Global Mining Guidelines Group (GMG) in all locations, departments and operations, in all jurisdictions. These set of standards can be expanded to include any contractors or volunteers; however, the remedies for any situation may differ from those of an employee.

1. Responsibilities

All workers (i.e., anyone performing work for an employer) are responsible to prevent, report, and stop harassment and violence from occurring in the workplace. All workers have individual responsibility to adhere to this policy in their work and actions. Specifically, the following responsibilities apply to workers, supervisors and managers:

1.1. Worker Responsibilities

- Read and understand the policy;
- Treat everyone in the workplace with dignity and respect at all times in compliance with this policy;
- Participate in workplace hazard assessment and attend workplace training for harassment and violence; and
- Raise any concerns about harassment or violence in the workplace and report any incidents to your supervisor or manager.

1.2. Supervisor and Manager Responsibilities

- All responsibilities listed above, and;
- Ensure the workplace is free from harassment and violence and take immediate action whenever there is reason to believe it is occurring;
- Inform workers about this policy and provide training to prevent, minimize or eliminate workplace harassment and violence;
• Respond appropriately to address all incidents and complaints of workplace harassment and violence in a fair, respectful and timely manner and fully support any investigation according to relevant policy and procedures;
• Respect the privacy of all concerned as much as legally possible; and
• Participate in workplace hazard assessment, identify any risks specific to one’s area of work and attend workplace training for harassment and violence.

2. Harassment in the Workplace

Harassment includes a broad range of behaviours that individuals can be subjected to, or participate in. Workplace harassment is behaviour intended to intimidate, offend, degrade or humiliate a person or group. It is a serious issue and creates an unhealthy work environment resulting in psychological harm to workers.

Harmful behaviour in the workplace is described under the Act respecting labour standards (ALS). To be psychologically harmful, the behaviour is vexatious conduct in the form of repeated behaviour, comments, actions or gestures that:

• Are aggressive or unwelcome
• Undermine the employee’s dignity or psychological or physical well-being
• Detrimentally affect the work environment

Psychological harassment includes both sexual and discriminatory harassment.

A single serious incident of such behaviour may constitute psychological or sexual harassment if it has the same consequences and a lasting harmful effect on the employee.

Harassment is defined by any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker’s health and safety. It includes conduct, comments, bullying or actions because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation; and, a sexual solicitation or advance.

Reasonable action taken by the employer or supervisors relating to the management and direction of workers or a work site is not workplace harassment, including the following:

• Allocation of Resources: To get work done, supervisors may have to make unpopular decisions, such as changing work assignments or reporting relationships. Such decisions may or may not please others, but they do not constitute harassment.
• Performance Feedback: Feedback regarding unsatisfactory work conduct and/or negative performance evaluation is not harassment. Supervisors have a responsibility to give appropriate criticism and to take appropriate corrective action when the work of a worker is not satisfactory. Such criticism should, however, be made in a reasonable manner and should be constructive.

3. Violence in the Workplace
Violence, whether at a work site or work related, is defined as the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm and includes:

- Physical attack or aggression;
- Threatening behaviour;
- Verbal or written threats;
- Domestic violence; and,
- Sexual violence.

4. Harassment and Violence Prevention Procedure

Hazard identification and assessment is a key part of preventing harassment and violence in the workplace. GMG is responsible to ensure that existing and potential hazards for workplace harassment and violence will be identified, appropriate measures will be put in place to eliminate or control the hazard, and specific safe work procedures will be developed to ensure a safe and respectful workplace at all times.

The hazard assessment process will specifically address all forms of workplace harassment and violence, such as physical assault/aggression, threat of violence, domestic violence and sexual violence as well a psychological harassment. In addition, the assessment will include information related to the risk of violence presented by members of the general public which could be encountered by Workers.

5. Incident Reporting Procedure

Individuals who have been the subject of discrimination, harassment or violence, should respond in the following manner:

- The individual affected ("the Complainant") is encouraged to make their objections known to the harasser or aggressor directly, when it is possible and safe to do so. Communicate the objection verbally, or in writing, and state clearly what unacceptable behaviour or action occurred and request that it stop immediately.

- The Complainant should create a written record of the incident, including all pertinent information:
  - Date and time
  - Nature of the discrimination, harassment or violence
  - Name of person(s) involved
  - Name of person(s) witnessing, if any
  - Full description of the incident, frequency
  - Supporting documents if available

- The Complainant should inform and discuss the situation with their Manager as soon as possible. Should the complainant not be able/comfortable to report to their manager or the manager be implicated in the complaint, the complainant can report direct to a member of senior leadership not implicated in the complaint. Either/or both the Complainant and/or
the Manager must report the incident to Senior Management to review and determine further action and response. In the case where the Complainant is a Manager or Senior Management, the report must be made to the Executive Council to review.

- Once information has been received, an investigation will begin in a timely, sensitive and confidential manner. Senior Management will determine if the situation requires outside Human Resources assistance.

- The Complainant, together with Senior Management, will report to the police when the situation requires it.

- Note that the reporting contact in Senior Management should never be under the direct control of the alleged harasser or aggressor or be the alleged harasser or aggressor themselves.

6. **Investigation and Disciplinary Procedures**

Any incident or complaint that involves workplace harassment or violence is a hazard to the health and safety of workers and all individuals in the workplace. GMG has a zero-tolerance policy for psychological and sexual harassment and violence, and expects all staff, contractors and members of GMG to adhere to its code of conduct, including treating others with respect. GMG commits to:

- Convene an investigation panel to review all incidents of harassment and violence;
- Based on the review, convene a disciplinary panel to address the incident, and to determine the corrective action to be taken and how to prevent it from happening again;
- Prepare a report which outlines the circumstances of the harassment or violence;
- Retain documents and records for at least two years in a confidential manner; and
- Cooperate with regulatory bodies on requests for information and documentation.

Where appropriate, GMG may elect to retain external investigation resources in particularly sensitive or difficult situations. Investigations will have a target timeline for completion of 90 days.

7. **Privacy and Confidentiality**

All records of harassment and violence and subsequent investigations are considered confidential and are strictly prohibited from being disclosed to anyone except to the extent required by law.

In cases where criminal proceedings are forthcoming, the organization will assist police agencies, lawyers, insurance companies, and courts to the fullest extent and will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. The organization will protect this privacy so long as doing so remains consistent with the enforcement of this policy and adherence to the law.
8. No Reprisal

No individual shall be penalized, reprimanded, or in any way criticized when acting in a good faith while following this policy and procedure for addressing situations involving harassment or violence in the workplace.

9. Worker Support

GMG will offer support to workers who are affected by an incident of harassment or violence in the workplace. Affected workers should be advised to consult a health professional (of the worker’s choice) for treatment or referral. There will be no deductions from the worker’s wages and benefits if the treatment sessions occur during regular work hours.

10. Fraudulent or Malicious False Claims

Unfounded, frivolous, or fraudulent allegations of harassment and violence may cause both the accused person and the company significant damage and will not be tolerated. Any individual who files a complaint of harassment or violence and, after a thorough investigation has been conducted, is found to have made a false claim, will be subject to the appropriate discipline, up to and including termination of employment.

11. Training and Communication

GMG’s Harassment and Violence Prevention Policy is available to all Workers. GMG will provide all Workers with initial and ongoing training about workplace harassment and violence including the following:

- The hazard of workplace harassment and violence;
- How to recognize the signs of danger;
- What to do about it; and
- How to report it.

12. Prevention Plan Administration and Review

Global Mining Guidelines Group Harassment and Violence Prevention Policy will be reviewed at least every three years by Management. The review will focus on whether the policy or procedures are current and if there are any deficiencies or gaps that need to be addressed.