



POWER CORPORATION
OF CANADA

Respectful Workplace Policy and Procedures



Table of Contents

1. Policy statement.....	3
2. Scope of the Policy.....	3
3. Behaviours that are prohibited under the Policy.....	3
3.1 Discrimination.....	3
3.2 Harassment.....	4
3.3 Violence.....	5
4. Privacy and confidentiality.....	6
5. Designated resource.....	6
6. Management rights.....	6
7. Complaints made in bad faith.....	7
8. Retaliation.....	7
9. Procedure if you believe your rights have been violated.....	7
Appendix A – Roles & responsibilities.....	8
Appendix B – Workplace violence – Special circumstances.....	10
Appendix C – Procedure if you believe your rights have been violated.....	11



1. Policy statement

Our commitment to a safe and respectful environment

Power Corporation of Canada (the “Corporation” or “we”) is committed to fostering a discrimination, harassment and violence-free workplace where all people are treated with respect and dignity, in a healthy, safe and productive work environment. We strive to create and maintain a work environment characterized by mutual trust and the absence of intimidation, discrimination, oppression and exploitation. Employees of the Corporation should be able to work and learn in a safe, yet stimulating atmosphere.

The objective of this Respectful Workplace Policy (this “Policy”) is to educate, prevent, identify and correct conduct which may result in workplace-related discrimination, harassment or violence.

No one who conducts business with the Corporation should tolerate any form of discrimination, harassment or violence. Likewise, no one has the right to discriminate, harass or be violent, towards anyone else, at work or in any situation related to employment.

The Corporation will not tolerate discrimination, harassment including sexual or psychological harassment, threats, violence, or any disrespectful or inappropriate behaviour in the workplace. The Corporation will take appropriate and immediate action in response to complaints or knowledge of violations of this Policy.

2. Scope of the Policy

This Policy applies to all current employees of the Corporation and its wholly owned subsidiaries (unless such subsidiary has a similar policy in place), including senior managerial personnel and full-time, part-time, contract, student, trainee, permanent and temporary employees (collectively, the “Corporation Personnel”).

This Policy also applies to situations in which Corporation Personnel experience discrimination, harassment, or violence in the workplace (defined below) by individuals who are not Corporation Personnel, such as contractors, consultants, clients, job applicants, suppliers or visitors.

The “workplace” includes any location in which Corporation Personnel are engaged in work-related activities, including, but not limited to, Corporation premises and surrounding perimeter including parking lots, sidewalks and driveways, off-site meetings, conferences or training sessions, client locations, work-related travel, social situations related to work and communications via telephone, email or social media. The Corporation’s obligations to apply this Policy are described in **Appendix A**.

3. Behaviours that are prohibited under the Policy

Anyone subject to this Policy is prohibited from engaging in the following behaviours:

- 3.1 Discrimination** – The Corporation is committed to providing equal employment, appointments and advancement opportunities based on appropriate qualifications, requirements and performance, and does not tolerate unlawful workplace discrimination.



Discrimination occurs when an individual is, intentionally or unintentionally, treated adversely or put at a disadvantage in his or her employment on the basis of a ground that is protected by human rights legislation. This means that you must not discriminate against anyone on the basis of any of the following grounds:

- Race, color, ancestry, aboriginal origin, ethnic background or origin, civil status, nationality, or citizenship;
- Age (except as provided by law), sex, gender identity or expression, or sexual orientation;
- Religion or religious activity, association, belief(s) or creed;
- Physical or mental disability or handicap;
- Political belief, opinion, activity of affiliation;
- Language or linguistic background;
- Marital status, family status or affiliation, pregnancy, or adoption;
- Lawful source of income or receipt of public assistance;
- Social condition or origin;
- Criminal conviction for an offence which is not connected with the employment or for which a pardon has been granted; or
- Actual or presumed association with other individuals or groups whose identity or membership is determined by any of the above grounds.

3.2 Harassment – The Corporation does not tolerate harassment. Harassment includes psychological and sexual harassment.

- a. **Psychological harassment** – Psychological harassment usually consists of a course of vexatious comments, conduct or behaviour that is known or reasonably ought to be known to be unwelcome. It includes behavior that is likely to undermine the dignity or self-esteem of an individual or create an intimidating, hostile or offensive environment. A single such event can also be considered harassment where it appears to create a lasting harmful effect on an individual.

Workplace psychological harassment can include verbal, visual or physical misconduct but is not limited to the following types of behaviours:

- Demeaning jokes or “kidding around” that is unwanted or offensive;
- Racial or ethnic slurs;
- Derogatory or insulting remarks or gestures;
- Taunting or scapegoating;
- Displaying or distributing pictures, computer screenshots, e-mails, or other material that is offensive or inappropriate;
- Verbal abuse or threats; or
- Threats or promises regarding job security, job opportunity or treatment.



The following conduct DOES NOT constitute psychological harassment:

- The normal and reasonable exercise of supervisory and management rights and responsibilities including, but not limited to, job assignments, working hours, performance reviews, work evaluations and disciplinary action;
- Differences of opinion;
- Minor disagreements between an employee and another person; and
- Isolated incidents of rudeness.

Psychological harassment may also include a poisoned work environment that can be created by the comments or conduct of a person directed at a particular group.

b. **Sexual harassment** – Sexual harassment is a course of vexatious comment or conduct against an individual because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. It may include but is not limited to:

- Sexist jokes and derogatory remarks;
- Sexually suggestive gestures or innuendoes;
- Sexually explicit material;
- Unwelcome physical contact of any nature;
- Comments about a person's body, sex life, relationships or physical appearance;
- Repeated unwanted sexual flirtation, advances or social invitations; or
- Requests for sexual favours or proposition.

3.3 Violence – The Corporation recognizes that any form of violence in the workplace is unacceptable, and is committed to eliminate the risk of violence in the workplace.

Workplace violence is defined as an actual, attempted or threatened conduct that causes or is likely to cause physical injury to a person in the Workplace (as defined in this Policy and in **Appendix B**). It includes any threatening or aggressive statement or behaviour that gives a person reasonable cause to believe that she or he is at risk of physical injury.

Acts of violence may be a single event or may involve a continuing series of incidents. It may include but is not limited to:

- Verbal or written threats;
- Threatening actions such as physical intimidation, throwing objects, property destruction, etc.; or
- Physical attacks.

a. **Reporting Workplace Violence and Summoning Immediate Assistance** – A member of the Corporation's Personnel who is victim of, or witness of, or witness to, an incident of workplace violence or domestic violence that presents an immediate risk of physical harm shall first try to remove him/herself from the situation. The next step would be to report the incident to their supervisor, to the Vice-President, Human Resources



(the “HR VP”) or as otherwise provided in **Appendix C**. In the event immediate assistance is necessary, dial 911 for emergency services.

A member of the Corporation’s Personnel who is the victim of, or witness to, violent acts which do not present an immediate risk of physical harm shall report the incident to their supervisor, to the HR VP or as otherwise provided in **Appendix C**. The victim can also consult a healthcare professional of his/her choice for treatment or referral in case of injury or adverse symptoms resulting from an incident of workplace violence.

- b. **Risk Assessment** – If deemed appropriate, the Corporation may conduct risk assessments to assess the risks of workplace violence that may arise from the nature of the work, the type of work or the conditions of the work. Further information can be found as an **Appendix B** to this Policy.

4. Privacy and confidentiality

The Corporation will handle all complaints swiftly and confidentially to the extent possible in light of the need to take appropriate corrective measures.

During the complaint process, the confidentiality of the information received and the privacy of the individuals involved will be protected to as great a degree as is possible. The confidentiality will be considered in the context of the Corporation’s legal obligation to act on the complaint and the right of the alleged harasser to obtain information.

In most cases, however, confidentiality will be strictly maintained by the Corporation and those involved in the investigation. In addition, any notes or documents written by or received by the person(s) conducting the investigation will be kept confidential to the extent possible and in accordance with existing provincial or federal law.

Managers, employees and all individuals involved in a harassment complaint process are expected to maintain the privacy and confidentiality of all of the other parties involved and to take the necessary measures to protect their personal information.

5. Designated resource

In order to foster open communication, feelings of safety and trust in the Corporation’s commitment to this Policy, employees are asked to contact the HR VP with any question.

6. Management rights

Harassment should not be confused with legitimate management actions.

The Corporation’s management right is defined as the right to direct employees and take decisions that are related to the profitability of the Corporation, in the best interest of the business. It is therefore seen as a range of discretion in managing the organization which is reserved for its management. It includes core rights such as determining the organization’s mission, budget and strategy, and operational rights such as assigning, directing, hiring and dismissing employees.

Examples of legitimate management actions:



- Modifying or changing job assignments;
- Conducting appropriate performance or probation evaluations;
- Overseeing day-to-day management and supervision;
- Managing absenteeism and attendance;
- Imposing disciplinary sanction where warranted; and
- Managing layoffs, terminations and dismissals.

7. Complaints made in bad faith

Any person who makes a false complaint or otherwise abuses this Policy will be subject to a formal investigation, and may be disciplined up to and including termination of employment. Such discipline is not a reprisal or breach of this Policy.

8. Retaliation

Interference with the course of an investigation or retaliation against a complainant or witness is prohibited under this Policy and may itself constitute discrimination or harassment. Any person who is found to have violated this aspect of this Policy may be subject to disciplinary action, up to and including termination of employment.

All parties subject to this Policy are expected to fully and honestly participate in the investigation process.

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a *bona fide* complaint of discrimination or harassment;
- Appearing as a witness in the course of an investigation of a complaint; or
- Serving as an investigator of a complaint.

9. Procedure if you believe your rights have been violated

If you believe you have been subject to any behaviour which is contrary to this Policy, you may address your concerns by following the procedure described in Appendix C of the Policy.

Adopted by the Compensation Committee on May 11, 2018 and amended by the Compensation Committee on March 18, 2020.



Appendix A – Roles & responsibilities

The Corporation's obligations

In accordance with the applicable laws and regulations, all employees have the right to work in a discrimination, harassment and violence-free workplace. This implies the Corporation has to:

Provide a workplace that is free from harassment

The Corporation must prevent any discrimination, harassment and violent situation through reasonable means and act to put a stop to any such situation as soon as it is informed of it, by applying the appropriate corrective measures.

Manage with a view to preventing harassment

The Corporation must adopt management practices that make it possible to prevent discrimination, harassment and violence. It must put in place a known and effective procedure that will allow it to be informed of any of those situations. This procedure must also make it possible to deal objectively and promptly with such situations when they arise, in order to put a stop to them.

Inform all personnel about the Policy

The Corporation must inform all of its personnel that it is committed to preventing and putting a stop to all discrimination, harassment and violence at work. The Corporation must provide all new employees with a copy of this Policy at the time of hiring, and may redistribute the document by memorandum or by e-mail if necessary thereafter.

Senior Management

The senior management is responsible for:

- Providing all employees with a discrimination, harassment and violence-free workplace;
- Being aware of what is happening in the workplace;
- Treating all incidences of discrimination, harassment and violence seriously;
- Undertaking to act on all complaints and ensuring that they are resolved quickly, confidentially and fairly; and
- Supporting supervisors and employees.

Supervisors

For the purpose of this Policy, a supervisor is someone who has direct management responsibilities or who supervises employees.

Supervisors are responsible for:

- Fostering a safe and discrimination, harassment and violence-free work environment;
- Setting an example of appropriate workplace behaviour;
- Treating all employees, suppliers, and contractors with respect;
- Listening to employees;



- Detecting risk factors and putting a stop to any form of prejudice;
- Communicating the process for investigating and resolving complaints made by employees;
- Dealing with workplace discrimination, harassment or violence immediately upon becoming aware of them, by reporting any discriminatory, harassment or violent behavior to the HR VP, even when there is no formal complaint;
- Taking appropriate action during an investigation, including separating the parties to the complaint, when appropriate; and
- Ensuring complaints are dealt with in a sensitive and confidential manner.

Employees

Employees are responsible for:

- Treating others with respect and consideration in the workplace;
- Complying with this Policy and taking appropriate measures to ensure that prohibited conduct does not occur;
- Speaking out when discrimination, harassment or violence occurs;
- Reporting any situation of discrimination, harassment and violence as provided in this Policy;
- Co-operating with any investigation; and
- Maintaining the confidentiality of anyone involved in a complaint.

Human Resources

The Human Resources Department is responsible for:

- Communicating the Policy to all employees;
- Administrating the Policy;
- Supporting supervisors through the application of the Policy;
- Communicating the process for investigating and resolving complaints;
- Listening to employees and receiving intervention demands or complaints;
- Dealing with discrimination, harassment and violent situations immediately upon becoming aware of them, whether or not a complaint has been made;
- Providing employees with the appropriate resources when facing discrimination, harassment or violence;
- Ensuring training of employees and supervisors on discrimination, harassment and violence and on this Policy;
- Ensuring complaints are dealt with in a sensitive and confidential manner;
- Ensuring that the Policy is applied in a timely, consistent and confidential manner;
- Determining whether or not allegations are substantiated; and
- Determining what corrective action is appropriate where a complaint has been substantiated.



Appendix B – Workplace violence – Special circumstances

Risk assessment

When a risk assessment is necessary, to assess the risks of workplace violence that may arise from the nature of the work, the type of work or the conditions of the work. It will take into account:

- Circumstances that would be common to similar workplaces; and
- Circumstances specific to the Corporation's workplace.

The results of this assessment will be communicated to the HR VP in the form of a written report. To the extent that certain risks are identified, safe work procedures will be developed and implemented.

Measures to minimize the risk of workplace violence

Safe work procedures have been and will be developed to inform and instruct Corporation Personnel about the risks of workplace violence. These risks will be identified in the risk assessment when necessary.

Work refusal

A member of the Corporation's Personnel who has reason to believe he/she may be endangered by workplace violence has the right to refuse the work in accordance with applicable law.

Notification of workers at risk

If a supervisor or the HR VP is aware that a member of the Corporation's Personnel can be expected to encounter a person with a history of violent behavior, and the risk of workplace violence by that person is likely to expose the member of the Corporation's Personnel to physical injury, or if an actual incident of workplace violence has occurred, or if an incident of workplace violence is reasonably expected to occur, the Corporation will take the following steps to ensure the safety of all Corporation Personnel:

- The HR VP will inform the General Counsel of the situation. If they deem it appropriate or necessary, both may inform the Chief Executive Officer (the "CEO") of the situation.
- The HR VP will advise the individuals who are at risk. The HR VP will also coordinate a review of current procedures to minimize risk.
- Information about the source of workplace violence will be provided to the Corporation Personnel who are at risk and their supervisors.
- Appropriate steps will be taken to protect Corporation Personnel.

In doing so, the Corporation will limit its disclosure of personal information to what is necessary to protect Corporation Personnel from physical injury.



Appendix C – Procedure if you believe your rights have been violated

If you believe you have been subject to or have witnessed any behaviour which is contrary to this Policy, you may address your concerns in the following way:

Direct action: speak up

If you believe you are being harassed, threatened or discriminated against, or have witnessed such behaviour, you can start by speaking up right away to the person that engages in this behaviour. You can speak to him/her directly, or write a letter. In that case, be sure to write the date and make a copy. In addition, it is recommended that you inform the HR VP of your initiative.

Informal procedure

If the behaviour occurs again, or if you are unable to deal directly with the person harassing, threatening or discriminating against you or someone else, you can speak to your supervisor, another manager or the HR VP to report the situation. If that person is involved in the complaint, please see the Corporation's General Counsel personally.

This procedure does not involve an investigation or an official decision. You can speak with the person of your choice to report and talk about the situation in total confidence. However, please remember that under this Policy, all supervisors are required to report any concerns relayed to them to Human Resources.

During this process, the person will ask you for details of what happened, may present you with any other options you may have, and he/she will ask how you want to proceed. This person will also record your concerns and report if and how the situation was resolved.

Mediation

If the informal procedure is unsuccessful, the HR VP may offer to the parties to the complaint mediation prior to proceeding with a formal complaint. Mediation can be initiated to help the parties solve the situation. It is a voluntary and confidential process. Mediation is a process by which a neutral third party (mediator) helps the people involved in the complaint to reach a solution that is acceptable to both parties.

Formal complaint

If the informal route for resolving a situation does not succeed or if it is not appropriate, the Corporation supports its employees by establishing the following procedures for lodging a formal complaint. We will treat all aspects of the procedures confidentially to the extent reasonably possible.

All employees have the responsibility to co-operate in the investigation. Both you and the alleged offender have the right to be accompanied by someone with whom you feel comfortable during the whole process.

You can report the situation to your supervisor, another manager, the HR VP, the Corporation's General Counsel or through EthicsPoint at powercorporation.ethicspoint.com or by telephone at 1-844-335-2685. EthicsPoint is a reporting hotline and web portal operated by a third-party provider and is available 24 hours a day, 365 days a year.

When making a complaint, be prepared to provide the following information:



- The name and position of the alleged offender;
- Details of what happened;
- Dates, times, and how often the incidents occurred;
- Where they happened; and,
- The names of any potential witnesses.

The HR VP and the General Counsel will review the provided facts and determine what falls within the scope of the Policy. If the Policy appears to have been breached, an investigation will be initiated and you may be asked to draft a full written statement. Note that if you report your complaint anonymously via EthicsPoint, you should be aware that an anonymous complaint may hinder the Corporation's ability to investigate the matter in a timely and effective manner.

If appropriate in the circumstances, the HR VP and the General Counsel will appoint an investigator. The investigator will describe the steps involved in the process, and he/she will meet with you, the alleged offender and any other potential witnesses, as appropriate.

At the end of the process, if required, the investigator will prepare a report for Human Resources setting out the allegations, the information obtained in the course of the investigation and the investigator's findings.

On the basis of this report, the HR VP, the General Counsel and the CEO will make a final decision to determine whether or not the Policy has been breached and he/she will set the appropriate measures to be taken as the case may be.

If required by applicable laws, the HR VP and the General Counsel may inform you, the alleged offender and the supervisors who are involved, in writing, with the outcome of the investigation including any appropriate disciplinary and/or other action that will be taken as the case may be.

In the event the complaint is well-founded, the measures may include but are not limited to: disciplinary letter in the offender's file, an apology issued to the complainant and/or the victim (if the complaint was made by someone else than the victim), training or coaching, transfer, and suspension with or without compensation. It could also lead to termination of employment or any other disciplinary action deemed appropriate under the circumstances.

The Corporation is also committed to taking any appropriate actions that may help the victim get through the direct and indirect impacts of the discrimination, harassment or violent situation on his/her health and quality of life.