



Canadian Policies and Procedures

<i>Program applies to:</i>	<input checked="" type="checkbox"/> <i>All employees</i>	<i>Rev. No. 04</i>
	<input type="checkbox"/> <i>Salaried Only</i>	<i>Rev. & Review Date- June 22, 2016</i> <i>Review Date- April 11, 2017</i> <i>Rev. & Review Date- June 18, 2018</i> <i>Rev. & Review Date - June 25, 2019</i> <i>Review Date-November 18, 2020</i>

CpK Interior Products (the “Company”) has zero tolerance for acts of workplace violence and harassment. This program exists to underline the seriousness of this issue and to establish that there is no acceptable level of violence or harassment in the workplace.

This program supports policies CGR-BMS10-031 (the “Policy”) and outlines the commitment of the Company to comply with all relevant federal and provincial legislation and will act as a guide to employees to enable employees to adhere to all legal and social standards regarding the recognition and prevention of workplace violence and harassment.

Employees who have reason to believe they may be endangered by workplace violence and harassment, or as being threatened or harassed are encouraged to seek protection under this program.

Workplace Violence and Harassment Defined

Under this program, and consistent with occupational health and safety legislation:

Workplace Violence means:

- a) The exercise of physical force against someone, in a workplace, that causes or could cause physical injury,
- b) An attempt to exercise physical force against someone , in a workplace, that could cause physical injury, or
- c) A statement or behavior that is reasonable for someone to interpret as a threat to exercise physical force against them, in the workplace, that could cause physical injury.

Workplace Harassment means: engaging in a course of vexatious comment or conduct against someone in the workplace that is known or ought reasonably to be known as unwelcome or workplace sexual harassment.

Workplace Sexual Harassment” means

- (a) engaging in a course of vexatious comment or conduct against a worker in a workplace 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, or



Canadian Policies and Procedures

(b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace: is defined as any land, premises, location, or thing at, upon, in or near which someone works. This includes areas such as offices, shop floors, restrooms, cafeterias, lockers, conference rooms, parking lots, mobile workplaces and Company related functions.

Prohibited Behaviours / Conduct

The Company prohibits anyone from behaving in a violent or threatening manner. Further, the Company prohibits all forms of workplace harassment. Such prohibited conduct includes but is not limited to:

- Making remarks, jokes, or innuendos that demean, ridicule, intimidate, or offend
- Bullying
- Leaving threatening notes at or sending offensive e-mails
- Inappropriate sexual touching, advances, suggestions, or requests
- Verbally threatening to injure an individual
- Shaking a fist at an individual
- Possessing a weapon at work
- Hitting, trying to hit or threatening to hit an individual
- Throwing, trying to throw or threatening to throw an object at an individual
- Kicking an object an individual is standing on, such as a ladder
- Trying to run someone down using a vehicle or equipment

Note: Properly discharged supervisory responsibilities are not considered workplace harassment

WORKPLACE VIOLENCE AND HARASSMENT PREVENTION

Safety in the Workplace

Employees must share the responsibility of making the workplace safe and healthy. Individuals are in the best position to identify and report harassment and potential threats of violence at an early stage to enable management to take appropriate measures to prevent workplace harassment and violence.

As such, all employees are obligated to report on a timely basis to their supervisor any acts of workplace harassment, or violence, or any other behavior that may indicate the potential for a violent act to be committed. Where it is not possible or practical to report such behaviour to your supervisor, an employee shall report any such behavior to Human Resources, a Health and Safety Committee member, or any other member of management, as applicable.

Risk Assessments

The Company will assess the risk of workplace violence and harassment in each of its locations and provide a copy of its report and recommendations to the local Health and Safety Committee. Risk assessments will be reviewed annually or more often, as necessary. This review will include measures & procedure to control the risks identified in the assessment as likely to expose a worker to physical injury.



Canadian Policies and Procedures

Training

The Company will provide information to employees regarding the Policy and this Program through safety talks and any other appropriate means.

Domestic Violence

Employees shall notify their supervisor, or Human Resources, as they deem appropriate if they are aware, or have reason to believe, that domestic violence may occur in the workplace and that it would likely expose an employee to physical injury.

The Company will take reasonable precautions to protect workers in situations where domestic violence could occur in the workplace and that it would likely expose someone to physical injury.

These situations will be dealt with on a case by case basis in order to develop reasonable precautions while attempting to respect the individual's privacy and sensitivity of the issue.

WHAT TO DO IF WORKPLACE VIOLENCE OR HARASSMENT OCCURS

Summoning Assistance

A. In Emergency or Dangerous Violent Situations

In an emergency or dangerous situation, employees shall summon assistance immediately by contacting their supervisor or dialing security directly. Security will phone the police or other emergency response personnel, if appropriate and required, and escort them to the scene. In locations with no on-site security, emergency personnel should be contacted directly.

*Important: Unless there is no other alternative, employees should **NOT** confront individuals who appear to be an immediate threat. Contact Security or 9-911 immediately.*

B. In Non-Emergency Violent Situations

Employees who observe or become aware of a non-emergency violent situation in the workplace, such as a verbal argument or other workplace harassment, shall immediately notify their supervisor. When that is not possible or practical, employees shall notify someone in Human Resources, the Health and Safety Committee, or another member or management.

The supervisor or other management shall:

1. Ensure all parties are safe and not placed in greater danger;
2. Attempt to diffuse the situation;
3. Call for emergency response personnel, if required; and
4. Report the incident to the appropriate parties



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POLICY #CGR-BMS10-018
WORKPLACE VIOLENCE & HARASSMENT PREVENTION PROGRAM
Effective Date: October 1, 2013

Canadian Policies and Procedures

Right to Refuse

An employee can refuse to work if he or she has reason to believe that he or she may be endangered by workplace violence.

The Investigation

Human Resources will investigate if the incident involves violence and/or the threat of violence and non-prohibited grounds based harassment.

Step 1: SUMMONING IMMEDIATE ASSISTANCE

- **Emergency Situations:** Employees shall summon assistance immediately by contacting their supervisor, dialing security directly or dial 9-911
- **Non-Emergency Situations:** Employee(s) makes complaint to Manager/Supervisor or HR representative. When this is not possible or practical, employees shall notify someone in Human Resources, the Health and Safety Committee, Security, or another member of management. HR takes ownership of all complaints

Step 2: HR representative will initiate and use a Workplace Violence & Harassment Investigation Checklist during the investigation

Step 3: HR Representative provides fact sheet to complainant(s) and requests fact sheet be completed and returned to HR Representative within 24 hours, where practical

Step 4: Upon receipt of complainant(s) fact sheet. HR representative holds meeting with complainant(s) within 24 hours, where practical, for purpose of seeking questions/clarification on fact sheet

When requested by the Complainant, the Company may try to resolve the complaint informally without a full investigation.

If it is determined a formal investigation is necessary, proceed as follows:

Step 5: HR representative meets with the respondent(s) and alleged witness(s), providing a fact sheet, and requests fact sheets be completed and returned within 24 hours, where practical

Step 6: Upon receiving the fact sheets, a HR representative holds meeting with respondent(s) and alleged witness(s) within 24 hours, where practical, for purpose of seeking questions/clarification on fact sheet

Step 7: Within one (1) week from Step 5, where practical: HR representative makes a disposition based on the findings of the investigation and convenes meetings with first the complainant(s) and respondent(s) to inform them in writing of the results of the



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PRODUCTS**

POLICY #CGR-BMS10-018
WORKPLACE VIOLENCE & HARASSMENT PREVENTION PROGRAM
Effective Date: October 1, 2013

Canadian Policies and Procedures

investigation and of any corrective action that has been taken or that will be taken as a result of the investigation

Step 8: The HR representative will maintain all investigation documentation in the Human Resources office

OR

If the incident involved harassment under the prohibited grounds:

- Statements are taken from the complainant, respondent and all relevant witnesses
- Findings from the investigation are used to take appropriate measure and corrective action
- Investigators report back to the complainant and respondent to inform them in writing of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation
- The situation is monitored so that there are no further occurrences and/or reprisals

Despite the foregoing, the Company may try to resolve a complaint informally without a full investigation when so requested by the complainant.

Information obtained during an investigation about an incident or complaint of workplace harassment or violence, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

Resolution of the Complaint

If the complaint is proven valid, corrective action will be taken against the offending employee. Appropriate discipline will depend on the facts of the situation and may include, but is not limited to, verbal or written warnings, reassignment of duties, suspension or termination. In certain circumstances, the Company may request that the employee attend counseling or seek help from a third party either voluntarily or as a condition of continued employment.

If it is determined that the complaint has no validity, and was, in fact, lodged with malicious intent, the complainant may be subject to discipline under the misconduct ruled outlined in the CpK Standards of Conduct.

Complaint resolutions deemed unsatisfactory may be appealed to the Plant Human Resources Manager.

The Policy and this Program in no way precludes the complainant's right to seek action under applicable federal or provincial legislation. However, both the Company and the Union urge employees to use the internal mechanisms as outlined above before seeking alternative recourse.



DELEGATION OF RESPONSIBILITIES

All Employees

- Report on a timely basis to the appropriate individuals any act of workplace violence or harassment, or other behavior that may indicate the potential for a violent act to be committed

Human Resources/Plant Health and Safety

- In consultation with the Joint Health and Safety Committee, develop workplace violence and harassment prevention programs and compliance plans to be followed by all CpK Operations in implementing this Policy
- Maintain an incident reporting system to record acts of workplace violence & harassment & appropriately communicate all official statistics & reports on incidents of workplace violence.
- Provide direction and guidance in matters relating to the maintenance of a violent and harassment-free workplace
- Receive, review & maintain site risk assessment & review re-assessments as required.
- Conduct investigations into acts of workplace violence.
- Regularly review reported incidents to improve prevention strategies.
- Maintain mandatory safety talks and corresponding records on workplace violence and workplace harassment prevention
- Review incident reports regarding acts of workplace violence and harassment and appropriately communicate all official statistics and reports on incidents of workplace violence and harassment.

Local Joint Health and Safety Committee

- Ensure workplace violence and harassment prevention policies and programs are posted
- Be a resource to employees, union and management in all matters relating to the maintenance of a violence and harassment-free workplace
- Receive, review and maintain site risk assessment and review re-assessments as required
- Provide to the Ministry of Labour all notices required under the Act where an incident results in a person being killed, critically injured or requiring medical attention.

Security Services

- Conduct risk assessments and provide information to the local Joint Health and Safety Committee
- Review risk assessments annually or more often as required to give effect to the program
- Counsel operating management on the development of measures to safeguard the employees and assets of CpK Interior Products
- Assist in investigations into threats or acts of workplace violence and harassment and maintain liaison with public law enforcement agencies



POLICY #CGR-BMS10-018
WORKPLACE VIOLENCE & HARASSMENT PREVENTION PROGRAM
Effective Date: October 1, 2013

Canadian Policies and Procedures

FCA Legal Department

- Assist in the development of procedures and programs to ensure compliance with government regulations pertaining to workplace violence and harassment prevention.
- Counsel operating management on legal issues relating to workplace violence and harassment prevention program.

SCOPE:

This policy applies to all components of CpK Interior Products Inc.

Sponsored by:
Plant Health and Safety Committees

Related Policy Statements:

- **CGR-BMS10-011** Health & Safety Policy
- **CGR-BMS10-017** Harassment Policy
- **CGR-BMS1-002** Code of Conduct
- **CGR-BMS10-004** Employee Discipline Policy

Version	Release Date	Description of Changes
01	10/13	Initial Release
02	06/16	Revision
03	06/18	Revision
04	06/19	Revision