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

1. Mission Statement and Objective

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 Purolator and its employees.

2. Scope

In compliance with the Canada Labour Code, this policy applies to employees of Purolator, any agent performing work on Purolator's behalf and to the members of Purolator'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 Purolator or travelling in the performance of their duties.

An "**employee**" is any individual, including part-time employees, contract employees, students and managers, who is employed by Purolator.

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.

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.

Discrimination is the negative or unfair treatment of an individual or group because of a personal characteristic protected under the law. This policy 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.

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

- Bullying (in person or online)
- Threats, including threats of a sexual nature, that are made directly or indirectly through an intermediary. Threats can be made through any method of communication including in person, over the phone, by email and on online message boards
- Excluding other employees from work or social events with the intent of isolating them in the workplace
- Tampering with or hiding another employee's personal belongings equipment or tools or intentionally impeding their work to demean or humiliate them
- Spreading rumours or gossip about an individual or group
- Making unwanted remarks about a person's body, clothing or appearance
- Making offensive jokes or remarks
- Stalking, inappropriately following a person or intruding on a person's privacy
- Persistently criticizing, undermining, belittling, demeaning or ridiculing a person
- Misusing authority to create hardship for an individual including:
 - Public ridicule or discipline
 - Maliciously changing work guidelines, restricting information or intentionally setting impossible deadlines that will lead to failure
 - Maliciously blocking applications for leave, training or promotion
- 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
 - Unwanted and inappropriate or persistent invitations, gifts, messages, calls, or requests, including of a sexual nature
- Engaging in any of the actions above because of a prohibited ground of discrimination under the *Canadian Human Rights Act*.

Examples of violence prohibited under this Policy can include inappropriate behaviour such as (but not limited to):

- Any form of violence or unwanted physical contact with or without an object, including kicking, punching, scratching, biting, squeezing, pinching, battering, hitting or spitting
- Verbal threats or intimidation
- Verbal abuse, including swearing or shouting offensively at a person
- Sexual violence, including:
 - Any form of sexual assault
 - Any touching of another employee's body in a manner having sexual undertones without their explicit consent. This includes touching any sexualized parts of the body and contact having sexual undertones with other parts of the body such as rubbing their shoulders or touching their hair without their explicit consent.
- Intentionally hitting or shoving another employee, with or without an object

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

- Consensual workplace banter and interactions (unless it includes hurtful remarks about an individual or a group)

- Reasonable management action carried out in a fair way including:
 - Engaging in performance management with a subordinate
 - Managing lateness or absenteeism
 - Enforcing Purolator policies or directives
 - Reprimanding an employee for a violation of Purolator policies or directives
 - Providing coaching to an employee, even if that person does not agree it is necessary
 - Conducting a disciplinary investigation or issuing corrective measures, including disciplinary measures
- Respectful disagreements over how to manage Purolator's personnel or operations, whether with direct report, peers or your manager
- Respectful disagreements over how to apply a provision of Purolator policy or collective agreement

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. Managers will forward any information received about incidents of potential workplace harassment or violence to the designated recipient.
- **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 Purolator.

Employees must also report all occurrences of harassment and violence to their immediate supervisor or to Human Resources, cooperate with Purolator in the handling 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. The designated recipient has delegated the authority to receive and address workplace harassment and violence incidents to all Human Resources Business Partners. The contact details of the delegates can be found at the safety board in each workplace. 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 employee 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.

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. Additionally, the nature of the allegations or information shared or received during the resolution process must remain confidential and not be disclosed 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, including delegates of the designated recipient and management. 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 or if 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.

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 orally or in writing through the following channels:

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
Mailing Address:
ClearView Connects
P.O. Box 11017 Toronto, ON
M1E 1N0

14. Non-Compliance

This Policy is intended to support outcomes that are preventative, restorative and/or corrective in nature including the following measures:

- Facilitated restorative conversation between parties
- Verbal or written apology
- Team-building sessions
- Review of policies and/or procedures
- Awareness campaigns to prevent future occurrences
- Non-disciplinary training (e.g. harassment and violence prevention, human rights)
- Leadership coaching
- Employee coaching on conflict resolution or communication

At the sole discretion of Purolator, disciplinary measures up to and including termination may be considered under a separate process governed by Purolator's Code of Business Conduct & Ethics in response to the following conduct:

- 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*.