WORKPLACE HARASSMENT AND VIOLENCE POLICY

Approved by: Paula Breeze, Chief Human Resources Officer October 23, 2025

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1. Purpose

The Workplace Harassment and Violence Policy (the "Policy") has been developed to represent CEDA's values and commitment to build awareness, prevent harassment and violence in the workplace and to deal quickly and effectively with an incident, should it occur.

Adherence to this Policy is a condition of employment and failure to adhere to it may result in disciplinary action up to, and including, termination in accordance with the CEDA Discipline Policy.

2. Scope

This policy is applicable to all CEDA employees and/or contractors.

3. Accountabilities

3.1 Operational and Functional Leaders

- Ensuring the workplace is free of violence and harassment.
- Educating and explaining to all employees and/or contractors the contents of this Policy.
- Instructing all employees and/or contractors in recognizing workplace violence, the appropriate response to workplace harassment and workplace violence, including how to obtain assistance, and procedures for reporting, investigating and documenting incidents of workplace harassment and workplace violence.
- Immediately reporting incidences of actual or perceived workplace harassment and workplace violence.
- Acting immediately or contacting your leader or appropriate authority when any concern for safety has been expressed, including possession of a weapon or threat or act of violence. Appropriate action may be in the form of investigation, intervention, or calming a stressful situation or contacting the authorities.
- Ensuring employees and/or contractors reports of violations or potential violations of this Policy are held in confidence and that retaliation of any kind is not permitted.
- Reporting violations of this Policy immediately to the appropriate Human Resources Representative or member of the Executive, as well as to security, where it exists, if immediate intervention is necessary.
- Being familiar with, understand and comply with this Policy.
- Lead by example, and act respectfully and professionally towards other employees and/or contractors while at work and while participating in any work-related activities.

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3.2 Frontline Leaders

- Actively ensure all applicable CEDA, client and legislative codes, regulations and practices and procedures are followed.
- Actively ensure all employees are not subjected to or do not participate in harassment or violence.
- Actively ensure all employees have received the appropriate training and are deemed competent to complete the job tasks safely.
- Actively ensure all equipment is safe, maintained, inspected and used correctly.
- Actively ensure all required procedures are followed to protect the environment.
- Participate in site tours, observations, tailgate, safety meetings and incident investigations where required.
- Actively ensure appropriate documentation and records are maintained and available for review or inspection.
- Lead by example.

3.3 HSE Representatives

- Actively ensure all applicable CEDA, client and legislative codes, regulations and practices/procedures are followed.
- Work with operational and functional leaders to help ensure all employees are not subjected to or do not participate in harassment or violence.
- Provide HSE support and guidance to operational groups at all times.
- Support the Human Resources group, as directed, in investigations of alleged workplace harassment or violence.
- Lead by example.

3.4 Human Resources

- Promote all applicable client and legislative codes, regulations and practices/procedures are followed.
- Work with operational and functional leaders to help ensure all employees are not subjected to or do not participate in harassment or violence.
- Embody the spirit and model appropriate behaviours, and act with the highest degree of integrity, in accordance with this Policy.
- Lead the investigation of all alleged incidents of workplace harassment and/or violence to ensure timely and appropriate outcomes.
- Provide recommendations and conclusions for each investigation.

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- Support operational and functional leaders to follow through on investigations recommendations and outcomes.
- From time to time, provide training to all employees to aid in the application and understanding of this Policy.

3.5 Employees and/or Contractors

- Understand, be familiar with, and comply with this Policy.
- Communicating to the offending party, as soon as possible, your objections to the behavior if you believe you have been treated in a manner contrary to this Policy and it is appropriate and you feel comfortable doing so. You may get help or assistance from a leader to do this.
- Immediately report concerns to your Supervisor, Human Resources or a Safety Representative about concerns for safety including acts or threats of violence, harassment or other violations of this Policy.
- Immediately reporting to management any criminal conviction you have received for a violent crime.
- Acting respectfully and professionally towards other employees and/or contractors and individuals while at work and while participating in any work-related activities.
- Cooperating with any efforts to investigate and resolve complaints arising under this Policy.
- Limiting discussion of any complaint arising under this Policy to those who need to know about the complaint.
- Handling all situations in confidence and direct that others act respectfully, in confidence and with dignity.
- Adhere to all applicable CEDA, client and legislative codes, regulations and practices/procedures.
- Attend Workplace Harassment and Violence Policy training as offered and/or directed.
- Refrain from causing or participating in harassment or violence.
- Lead by example.

4. Definitions and Acronyms

BULLYING means offensive, hostile or intimidating conduct that undermines an employee's dignity, self-esteem, confidence and\or ability to perform their job. Bullying is a form of harassment that does not necessarily fall under the prohibited grounds of discrimination under human rights legislation and excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Examples of bullying include: verbal aggression or yelling, patronizing, intimidating and humiliating comments or gestures, spreading malicious rumours, name-calling, insults, silent treatment and ostracizing, unwarranted criticism, or abuse of authority.

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CEDA means CEDA Limited Partnership and its subsidiaries and entities.

CEDA BUSINESS means all work-related activities engaged in by employees and/or contractors while working on CEDA or customer premises or CEDA worksites, participating in company-related social activities, in public while representing CEDA, or operating any vehicles leased or owned by CEDA in conjunction with these activities.

CEDA EVENT means a CEDA sponsored event that may be on CEDA property or on public property.

CLAIMAINT means an individual who claims someone has done something illegal or wrong, typically without proof that this is the case.

DOMESTIC VIOLENCE means any form of abuse inflicted on an employee by a family member or partner, including stalking or violation of a protection order. Situations of domestic violence can present a risk in the workplace.

EMPLOYEE AND/OR CONTRACTOR means any person employed by CEDA on a permanent full or part-time basis as well as independent contractors of CEDA and subcontractors providing services to CEDA or on behalf of CEDA.

GOOD FAITH means an individual, who acts without malice or the desire to falsify, defraud or mislead others, when reporting an unethical, improper, or illegal practice or any other alleged misconduct. An individual shall be deemed to be lacking good faith when the individual does not have personal knowledge or a factual basis for the communication or where the individual knew or reasonably should have known that the communication about the unethical, improper, or illegal practices or any other alleged misconduct was malicious, false, frivolous or misleading.

HARASSMENT as defined by the applicable human rights and occupational health and safety legislation (see Section 6.2), is improper conduct or comment, whether verbal, written or physical in nature that is directed at and offensive to another individual and adversely affects the psychological or physical wellbeing of another individual and that the individual knew or ought reasonably to have known to be unwelcome or offensive, and is based on the prohibited grounds of discrimination identified below.

Harassment may arise from a single incident or from a series of incidents, depending on the severity of the behaviour.

Examples of harassment include: unwelcome remarks, derogatory comments, jokes, images, gestures, innuendo, taunting, or threats related to any one or more of the enumerated grounds of discrimination as defined below.

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HUMAN RESOURCES REPRESENTATIVE means a Business Partner, Manager, Director or Vice President (VP) of Human Resources.

LEADER means any person who has direct accountability for an employees and/or contractors or group of employees and/or contractors and may include but is not limited to service line manager, supervisor, site supervisor, foreman, etc.

RESPONDENT means the named individual alleged to have engaged in harassment.

RETALIATION means an adverse action or threat of an adverse action taken against an employees and/ or contractors in response to a good faith complaint of a known or suspected violation of this Policy.

SEXUAL HARASSMENT means any unwelcome conduct or comment of a sexual nature, which has the effect of creating an intimidating, offensive or hostile work environment, or leads to adverse job consequences, such as job security, promotions or earnings. Sexual harassment may arise from a single incident or from a series of incidents, depending on the severity of the behaviour.

Examples of sexual harassment include: unwelcome sexual advances, requests for sexual favours, suggestive remarks, jokes, innuendo, gestures or invitations, displays of sexual images, unwanted touching or sexual assault.

VIOLENCE means the attempted, threatened or actual conduct of a person that causes or is likely to cause physical injury.

Examples of violence include, but are not limited to: threatening behaviour such as shaking fists, destroying property or throwing objects, verbal or written threats that express an intent to inflict harm; physical attacks; or any other act that would cause fear in a reasonable person in the circumstances.

WEAPON means any instrument that can inflict designed, made, and adapted or any object otherwise used, for the purpose of inflicting serious bodily injury or death.

WORKPLACE means any location where CEDA conducts business; or any facility/location used to support CEDA sponsored events and/or work or social gatherings.

5. Policy

All employees and/or contractors and clients are entitled to enjoy a workplace free of harassment and violence. Workplace harassment and violence is unacceptable and will not be tolerated under any circumstances.

This Policy prohibits all harassment, bullying or violent behaviour, including behaviour based on the enumerated grounds as defined by the Canadian Human Rights Commission or such grounds as may be amended from time to time:

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- Race
- Religion
- Colour
- Ancestry
- Age
- Sex or gender
- Marital status
- Family status
- Source of income
- Place of origin
- Physical disability
- Mental disability
- Sexual orientation
- Gender identity/expression
- Record of offences

Any acts or threats of violence or harassment by or against any employees and/or contractors or any other persons or property are prohibited on any CEDA property or client job site or while conducting CEDA business or attending or participating in a CEDA event.

Employees and/or contractors on a client job site are required to follow both the client's policy and this Policy. If client's policy and this Policy are in conflict, employees and/or contractors are required to follow whichever policy has the higher standard.

5.1 Breach of Policy

CEDA will respond quickly to complaints about harassment, bullying or violence in the workplace. Violations of this Policy will not be tolerated and appropriate discipline, up to and including dismissal will be implemented when a violation occurs.

Retaliation by the respondent or the complainant against any employees and/or contractors filing a complaint or participating in an investigation is prohibited and will not be tolerated. Retaliation of any kind or nature shall be considered a disciplinary breach and penalized at least as severely as the alleged initial harassment.

Breach of confidentiality in the investigation of a report or any matter discussed in an investigation may lead to disciplinary action and repeated breaches or the nature of the breach may include penalty of termination.

5.2 Practice

Violence is not limited to physical assault. It is any act in which a person is abused, threatened, intimidated or assaulted in his or her employment. While exact definitions may vary in legislation, generally speaking workplace violence includes:

- Threatening behaviour – such as shaking fists, destroying property or throwing objects.
- Verbal or written threats – any expression of an intent to inflict harm.
- Harassment – any behaviour that demeans, embarrasses, humiliates, annoys, alarms or verbally abuses a person and that is known or would be expected to be unwelcome. This includes words, gestures, intimidation, bullying, or other inappropriate activities.
- Verbal abuse – swearing, insults or condescending language.
- Physical attacks – hitting, shoving, pushing or kicking.

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- Rumours, swearing, verbal abuse, pranks, arguments, property damage, vandalism, sabotage, pushing, theft, physical assaults, psychological trauma, anger-related incidents, rape, arson and murder are all examples of workplace violence.

The possession or use of weapons in the workplace is strictly prohibited, whether concealed or openly carried. The use or threat of weapons in the workplace will not be tolerated under any circumstance.

Harassment can exist even where there is no intention to harass or offend another. Every person must take care to ensure his or her conduct is not offensive to another.

Workplace violence is not limited to incidents that occur within a traditional workplace. Work-related violence can occur at off-site business-related functions (conferences, trade shows) and at social events related to work. It does not extend to harassment that arises out of circumstances unrelated to the worker's employment. For example, if it occurs during a social gathering that is not sponsored by the employer. In some circumstances, domestic violence can also impact the work environment; as such employers may become involved in domestic issues if there is knowledge or impacts to the work environment.

This policy does not apply to day-to-day management or supervisory decisions involving work assignments, job assessment and evaluation, workplace inspections, and disciplinary action. These actions are not harassment, even if they sometimes involve unpleasant consequences. Managerial actions must be carried out in a manner that is reasonable and not abusive.

5.2.1 Harassment and Violence Prevention

Risk Assessment

Management is responsible to conduct a hazard assessment to assess and evaluate the possibility of workplace violence, taking into account the:

- Nature of the work activities.
- Working conditions.
- Design of the work activities and surrounding environment.
- Frequency of situations that present a risk of workplace violence.
- Severity of the adverse consequences to the employee exposed to a risk of workplace violence.

A response strategy must be developed based on the level of risk identified in the hazard/risk assessment.

Reference CEDA Hazard Identification & Risk Assessment Practice.

Reporting

Employees who feel they are being harassed may prefer to have an informal discussion with their leader first. They may be unsure about filing a formal complaint, fear reprisals or just want to seek advice about the situation.

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If, you believe, you have been subjected to harassment or violence:

- If you feel comfortable in doing so, tell the responsible individual his/her behavior is unwelcome and ask him/her to stop. In cases of workplace harassment or workplace violence, ensure your personal safety is protected before taking any action.
- Keep a record of incidents (date, times, locations, possible witness, what happened, your response etc.). You do not have to have a record of events in order to file a complaint, but a record will help you remember details over time.

File a complaint promptly. If, after asking the responsible employees and/or contractors to stop his/her conduct/behavior (when appropriate), the conduct/behavior continues or if you feel the initial behavior is severe, report the situation to one of the following:

- Frontline leader
- Human Resources Representative
- Member of the Executive

Support

CEDA will ensure support is offered to any person who has been involved in an incident of workplace violence or harassment through the Employee and Family Assistance Program (EFAP) and will encourage affected individuals to consult a health professional of their choice for treatment or referral.

Any person who is seeking medical treatment or counselling after being involved in an incident of workplace violence as defined by this Policy and applicable regulatory bodies will not experience a reduction in pay or benefits to attend these appointments.

Investigation of Reports

CEDA will ensure that an appropriate investigation, according to the circumstances, is conducted when Human Resources, a manager or supervisor becomes aware of an incident of workplace harassment or receives a complaint of workplace harassment.

CEDA will set out any interim measures that may be taken after the complaint is received and during the investigation.

The VP of Human Resources or designate will determine who will conduct the investigation into the incident or complaint of workplace harassment. If the allegations of workplace harassment involve, senior leadership, president and above, CEDA will refer the investigation to an external investigator to conduct an impartial investigation.

The investigation must be completed in a timely manner and generally within **90 days or less** unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

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Each alleged complaint will be investigated. The person conducting the investigation whether internal or external to the workplace will, at minimum, complete the following, as warranted by the VP of Human Resources:

- The investigator will ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation.
- The investigator will thoroughly interview the worker who allegedly experienced the workplace harassment and the alleged harasser(s), if the alleged harasser is a worker of the employer. If the alleged harasser is not a worker, the investigator should make reasonable efforts to interview the alleged harasser.
- The alleged harasser(s) will be given the opportunity to respond to the specific allegations raised by the worker. In some circumstances, the worker who allegedly experienced the workplace harassment should be given a reasonable opportunity to reply.
- The investigator will interview any relevant witnesses employed by the employer who may be identified by either the worker who allegedly experienced the workplace harassment, the alleged harasser(s) or as necessary to conduct a thorough investigation. The investigator will make reasonable efforts to interview any relevant witnesses who are not employed by the employer if there are any identified.
- The investigator will collect and review any relevant documents.
- The investigator will take appropriate notes and statements during interviews with the worker who allegedly experienced workplace harassment, the alleged harasser and any witnesses.
- In most circumstances the investigator will prepare a written report summarizing the steps taken during the investigation, the complaint, and the allegations of the worker who allegedly experienced the workplace harassment, the response from the alleged harasser, the evidence of any witnesses, and the evidence gathered. The report must set out findings of fact and come to a conclusion, on the balance of probabilities, about whether workplace harassment was found or not.

Investigation of Results

Upon conclusion of the investigation, the VP of Human Resources or delegate, will meet with the alleged offender's manager to discuss the investigation findings and conclusions. Together, Human Resources and the employee's manager will determine appropriate next steps including disciplinary outcomes. Investigation findings and outcome will be kept confidential. Any information which is disclosed will only be disclosed to those with a legitimate "need to know" basis. Complainants will be informed that action has been taken when applicable, but will not be provided with the details.

If investigation confirms a violent incident has occurred, CEDA will file appropriate documents with regulatory bodies as required.

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Corrective Action and Discipline

If the investigation confirms the allegation occurred, appropriate disciplinary action shall be taken. This may include discipline up to and including termination.

If the investigation is not able to confirm the allegation, but believes the allegation was made in good faith, no disciplinary action shall be taken against the complainant or the alleged harasser(s). No record of the allegation shall be kept in the alleged harasser(s) personnel file.

If the investigation confirms, the alleger falsely, knowingly or maliciously accused the alleged harasser(s), the alleger will be subject to discipline up to, and including, termination.

Reference CEDA Disciplinary Policy.

CEDA takes investigations seriously and is committed to this process however, this harassment policy and practice is not intended to discourage an employee from exercising rights pursuant to any other law. Employees also have the right to file a complaint with their applicable provincial Human Rights Commission or to request the assistance of a provincial occupational health officer to resolve complaints.

5.3 Confidentiality

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is on-going, the worker who has allegedly experienced harassment, the alleged harasser(s) and any witnesses should not to discuss the incident or complaint or the investigation with each other, other workers or witnesses unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All records of the investigation will be kept confidential

5.4 Training

CEDA leaders are required to complete CEDA's Respect in the Workplace training, an internal classroom-based training course. This course provides an awareness of respectful behaviors and enable the learner to have the necessary skills to identify and eliminate disrespectful behaviours in the workplace.

Copies of course completion will be retained in CEDA's Learning Management System.

For further information on CEDA's Incident Investigation Training, contact Learning and Development at training@cedagroup.com.

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6. Supporting Documents

6.1

Document Name	Document Identification	Revision
CEDA's Discipline Policy		
Stopping Unsafe Work Practice		
Hazard Identification & Risk Assessment Practice		
HSE Meetings & Communications Practice (Joint Health & Safety Committee Representatives)		
Employee & Family Assistance Program (EFAP)		

6.2 Applicable federal, provincial, and state occupation health and safety legislation are references for this Policy.

6.2.1 Provincial Occupational Health and Safety legislated definitions of Harassment:

Alberta:
"harassment" means 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, and includes
(i) conduct, comment, bullying or action 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
(ii) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site;

Saskatchewan:
"harassment" means any inappropriate conduct, comment, display, action or gesture by a person that:
(a) is made on any prohibited grounds defined in The Saskatchewan Human Rights Code, 2018, or physical weight or size;
(b) adversely affects the worker's psychological or physical well-being and that the perpetrator knows, or should know, would cause the worker to be humiliated or intimidated; and
(c) constitutes a threat to the health or safety of the worker;

British Columbia:
"bullying and harassment":
(a) includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but

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(b) excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Ontario:
"workplace harassment" means,
(a) engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or
(b) 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
(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;

6.3 Applicable provincial human rights legislation are references for this Policy
Alberta: https://www.albertahumanrights.ab.ca
Saskatchewan: https://saskatchewanhumanrights.ca
British Columbia: https://bchumanrights.ca/
Ontario: http://www.ohrc.on.ca

7. Interpretation and Updating

The Policy will be reviewed annually to ensure compliance with provincial legislative requirements; following an incident of violence or harassment that indicates a review is required; and when there is a change to work or work site that could affect the potential for violence or harassment.

A Human Resources Representative is accountable for responding to any requests for clarification and for regular review and updating of this policy.

8. Revision Record

Revision Date	Section Affected	Changes Made
August 18, 2015	All	Policy placed into updated format. Risk Assessment section added Employees changed to "employees and/or contractors"
April 30, 2018	All	Policy into updated format and house within Intelex Document Control

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August 1, 2019	All	Update definitions and add provincial language
October 15, 2020	6.2	Provincial definitions incorporated
August 9, 2022	None	Policy reviewed; no revisions made
October 18, 2022	6.2	SK definition updated
July 17, 2024	5.2	Add OHS language
April 1, 2025	5.2	Add weapon statement
October 23, 2025	7	Added policy review and updating

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