

Respect in the Workplace Policy

Last reviewed: September 2022

Social Capital Partners (“SCP”) is committed to providing a safe and respectful work environment. All workers are entitled to work free from workplace discrimination, harassment and violence. SCP will take the steps that are reasonable in the circumstances to prevent workplace discrimination and harassment and to protect our workers from workplace violence from any source, be it from members, clients, colleagues (supervisor, subordinate or peer), service providers (i.e. delivery or maintenance personnel) or strangers. This policy applies to all activities that occur while on SCP’s premises or while engaging in work-related endeavors, such as SCP business, activities or social events. In the event of a conflict or ambiguity between this policy and the applicable legislative requirements, the applicable legislative requirements shall govern.

SCP recognizes that workplace discrimination, harassment and workplace violence are occupational health and safety hazards and may result in physical or emotional harm to workers. SCP will not tolerate any workplace discrimination, harassment or violence, from any source. Workplace health and safety is built on the internal responsibility system, and thus everyone in the workplace is responsible for upholding and complying with this policy and working together to prevent workplace discrimination, harassment and violence. Failure to comply with this policy may lead to discipline, up to and including termination of employment.

1.0 Definitions

Discrimination means any form of unequal treatment based on a ground protected by, and as recognized by the *Human Rights Code, RSO 1990* (the “Code”), and/or any other applicable human rights legislation.

Workplace Harassment means 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. Workplace harassment includes, but is not limited to, workplace sexual harassment, psychological harassment and harassment based on any prohibited ground under the Code or applicable human rights legislation.

Workplace harassment includes many forms of behaviour, such as:

- insulting, intimidating, demeaning, annoying, embarrassing or otherwise offensive behaviour;
- inappropriate or unwelcome focus or comments on a person’s physical characteristics or appearance;
- bullying and cyberbullying;
- isolation and shunning, gossip, rumours, negative blogging or social media; and
- slamming doors, throwing objects and physical contact.

Reasonable action taken by SCP or a supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

Workplace Sexual Harassment means 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 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 sexual harassment includes, but is not limited to:

- unwelcome sexual advances;
- requests for sexual favours;
- other verbal or physical conduct of a sexual nature including sexual jokes, graphic spoken commentary about a person's body, derogatory or degrading remarks, leering, whistling, unwanted touching, hugging, kissing, tickling, pinching, patting, assault;
- enquiries or comments about an individual's sex life; and
- displaying sexually offensive material in the workplace.

Workplace Violence means the attempted or actual exercise of physical force against a worker in the workplace that causes or is likely to cause physical injury to the worker, or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker. Workplace violence includes domestic violence that occurs in the workplace.

Violence or threatening conduct includes but is not limited to:

- hitting, punching, slapping or other means of assaulting another person;
- challenging another person to a fight;
- engaging in dangerous, threatening or unwelcome horseplay;
- bringing a knife or other weapon of any kind onto or proximate to SCP's premises including parking lots or other exterior proximities; and
- threatening harm through words, gestures, symbols or written materials.

2.0 Responsibilities and Safe Workplace Commitment

SCP is committed to maintaining a professional and respectful work environment, and will ensure this policy is implemented and maintained and that all workers and supervisors have the appropriate information and instruction to protect themselves from discrimination, harassment and violence in the workplace.

All workers are responsible for working in compliance with this policy to support an atmosphere of trust, mutual respect and safety. All workers are strongly encouraged to report any incidents of workplace discrimination, harassment or violence. There will be no negative consequences for complaints of discrimination, harassment or violence made in good faith.

Supervisors and managers are responsible for following this policy. They are also responsible for ensuring that measures and procedures developed to implement this policy are followed by workers and that workers have the information they need to protect themselves.

Management will comply with reporting, investigation and documenting procedures and investigate and address all concerns, complaints or incidents of workplace discrimination, harassment or violence in a fair and timely manner while maintaining the confidentiality of incident and complaint information to the greatest extent possible.

Workers who engage in workplace discrimination, harassment or violence, as defined above, may be subject to disciplinary action, up to and including termination of employment. Workers may also be prohibited from entering our premises and may be subject to criminal prosecution in accordance with applicable law.

3.0 Procedures

Minimizing the Risk of Workplace Violence

SCP will take all reasonable and practical steps to prevent violence in the workplace, including conducting a risk assessment in order to identify possible sources of violence and implementing a violence prevention program in order to eliminate or minimize the risk of violence.

Summoning Immediate Assistance in the Event of a Violent Incident

If an incident of workplace violence occurs, workers should remove themselves from the situation (if possible). The first priority is to make the workplace and those within the workplace safe, and then to notify relevant internal and external authorities, including calling the police (911) if necessary.

Reporting and Investigation

SCP will investigate all incidents and complaints of workplace discrimination, harassment or violence in an objective and timely manner, take any necessary action to respond to those incidents, and provide reasonable support for complainants.

In response to an incident or complaint of workplace discrimination, harassment or violence:

1. Where possible, and if the worker is comfortable doing so, a worker who has experienced discrimination or harassment may make it known to the individual engaged in the discrimination or harassment, in clear terms, that her or his behavior is unwelcome and will not be tolerated.
2. The worker alleging workplace discrimination, harassment or violence should make a complaint to their reporting manager, or alternatively to SCP's Managing Director.
3. Workers can report incidents or complaints of workplace discrimination, harassment or violence verbally or in writing. The worker reporting the incident or the person receiving the complaint should record the following information:

- a. Name(s) of the worker who has allegedly experienced workplace violence or harassment and contact information.
 - b. Name(s), position(s) and contact information (if known) of the persons involved in the incident.
 - c. Names of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information (if known).
 - d. Details of what happened including date(s), frequency and location(s) of the alleged incident(s).
 - e. Any supporting documents the worker may have in his/her possession that are relevant to the complaint.
4. All complaints received must be escalated to **Jon Shell**, or to another member of SCP's management where necessary and appropriate. Upon receipt of the complaint, SCP will determine the method of investigation and action required to resolve the issue. Those concerned will be provided with information related to the investigation to the extent necessary while protecting the confidentiality of the complaint and parties concerned to the greatest extent possible.
 5. The formality and scope of the investigation will be determined by the specific circumstances of each complaint. SCP will determine the neutral individual or organization appropriate to conduct the investigation and may select an external third party to do so where appropriate.

The worker who has allegedly experienced workplace violence or harassment and the individual(s) allegedly engaging in the workplace violence or harassment, if she or he is a worker of SCP, will be informed 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.

4.0 Confidentiality

The investigation of each complaint will be handled in as confidential a manner as possible. While the investigation is on-going, the parties to a complaint and any investigation participants are not to discuss the complaint, incident or the investigation with other workers or participants unless necessary to obtain advice about their rights, or if they are legally required to do so.

Information obtained about an incident or complaint of workplace harassment, including identifying information about any persons involved, will not be disclosed unless the disclosure is necessary for the purposes of conducting a full and fair investigation or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

All records of the investigation will be kept confidential.

5.0 Retaliation Prohibited

Any retaliation against an individual who has complained about or who has participated in an investigation of alleged harassment or other improper conduct is strictly prohibited. Any worker

who feels that she or he is being retaliated against in violation of this policy, should contact SCP's Managing Director, or another member of SCP's management if necessary and appropriate, and the worker's concerns will be promptly and thoroughly reviewed.

6.0 Questions

Any questions regarding compliance with this policy should be directed to a worker's direct manager or a member of SCP's management.

End of Policy