



Limen Violence and Harassment Policy

PURPOSE:

Limen is committed to reinforcing the value of respecting others in the workplace and will endeavor to provide a workplace free from all forms of violence or harassment in accordance with applicable human rights legislation. Both workplace Violence and Harassment are serious offences, which will provide grounds for disciplinary action up to, and including dismissal. All workplace violence or harassment complaints will be dealt with in a fair, confidential and expeditious manner.

POLICY OBJECTIVES:

- Promote good management practices directed at creating a welcoming work environment.
- The prevention of any conduct in the workplace that promotes violence or harassment violates the fundamental rights, personal dignity or integrity of any person subjected to such conduct.

APPLICATION:

This policy applies to all employees and sub-contractors of Limen Covering all forms of violence or harassment that may occur at work or away from the workplace, provided the acts are committed within the context of the employment or sub-contracting relationship.

DEFINITIONS:

Workplace violence is defined as the exercise of physical force by a person against a worker that causes or could cause physical injury to the worker. Workplace violence also includes:

- Any attempt to exercise physical force against a worker in a workplace that could cause physical injury to the worker *or*
- Any statement or behavior that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Examples of Workplace Violence Include:

- Verbally threatening to attack a worker;
- leaving threatening notes or sending threatening e-mails to a workplace;
- shaking a fist in a worker's face;
- wielding a weapon at work;
- throwing an object at a worker;
- sexual violence against a worker;



- kicking an object the worker is standing on such a ladder or
- Attempting to run down a worker using a vehicle such as a forklift.

Harassment is defined as one or a course of comments or conduct causing worry or annoyance which is based on any of the following personal characteristics: race, creed, colour, religion, sex, sexual orientation, age, disability, ethnic origin, place of origin, citizenship, spoken language, marital status, family status or pregnancy, that is known or ought to be reasonably known to be unwelcome.

Harassment has the effect of creating a degrading, intimidating or hostile work environment for the person experiencing it. There may be circumstances where a single incident is serious enough to amount to harassment.

Sexual Harassment is any unwelcome conduct of a sexual nature that detrimentally affects the work environment or leads to adverse job related consequences for the victim of the harassment.

Personal Harassment is not based on any of the prohibitive grounds under the human rights legislation. It is a form of behavior that for a variety of reasons demeans, embarrasses or places a person in a state of anxiety or fear.

A Complaint is a formal allegation of harassment, submitted in writing.

ROLES AND RESPONSIBILITIES:

- **Employer:** Responsible for allocating the necessary resources, ensuring that the procedure is implemented at head office, on all sites, and reviewing the procedure annually.
- **Health and Safety Manager:** receives the complaint and is responsible for monitoring compliance with the procedure, reporting findings to Limen management, and reviewing the procedure at least annually.
- **Office Manager:** receives the complaint if it relates to the Manager of Health, Safety & Environment.
- **Management:** must be aware of the signs and symptoms of harassment and act promptly to resolve related problems.
- **Complainant Alleging Workplace Violence or Harassment:** must inform the aggressor of the unwelcome conduct and request that it stop. The Violence and Harassment reporting form must be filled in, with the assistance of the investigator. Witnesses and details of the events should be documented. The complainant must establish that the alleged harassing behavior did occur.



- **Person Accused of Workplace Violence or Harassment:** must record conversations, dates of occurrences, details, witnesses and must provide evidence that either the alleged incidents did not occur or did not constitute harassment.
- **Workplace Violence or Harassment Advisors:** inform employees, managers and sub-contractors of their rights and responsibilities under these guidelines. In addition, the Advisor may assist a person with the filing of a complaint.
- **Investigator:** from either within or from outside the company, and who is competent, carries out the formal investigation.
- **Mediator:** helps to resolve conflict and arrive at a mutually acceptable solution.

TRAINING

All employees and sub-contractors will be trained as to this procedure. This procedure is to be posted on the company's Health and Safety Bulletin.

NO REPRISAL

Workplace Violence and Harassment and this policy are serious matters. This policy prohibits reprisals against employees who have made good faith complaints or provided information regarding a complaint or incident of workplace violence and/or harassment. Employees who engage in reprisals or threats of reprisals may be disciplined up to and including dismissal from employment.

Reprisal includes:

- Any act of retaliation that occurs because a person has complained of or provided information about an incident of workplace violence.
- Intentionally pressuring a person to ignore or not report an incident of workplace violence.

An employee who makes a false complaint or otherwise abuses this policy may be disciplined up to and including dismissal from employment. Such discipline is not a reprisal or breach of this policy.

Antonio Lima
President

April 04, 2019

Date