**Zero Tolerance Policy**

This policy aims to maintain and foster a work environment in which all employees are treated with decency and respect. We have adopted a zero-tolerance policy toward discrimination and all forms of unlawful harassment, including but not limited to sexual harassment. This zero-tolerance policy means that no form of unlawful discriminatory or harassing conduct towards any employee, client, contractor, or another person in our workplace will be tolerated. The company is committed to enforcing its policy at all levels and any employee who engages in prohibited discrimination or harassment will be subject to discipline, up to and including immediate discharge from employment for a first offense.

It is intended to cover actions by or towards Directors, employees, contractors, and volunteers and to include actions in any situation involving the work relationship both onsite and offsite (e.g., meetings offsite, office parties):

Harassment is defined as any unwanted physical or verbal conduct that offends or humiliates the recipient, that interferes with their ability to work and learn or leads to adverse job-related consequences, and that any reasonable person ought to have known would be unwelcome. It does not include the legitimate exercise of supervisory authority regarding performance reviews, work evaluations, or valid disciplinary measures. It may include direct or implied threats of firing, loss of promotion or loss of pay raise, or may create an intimidating, hostile, or offensive work setting. Examples of harassment include, but are not limited to, racial or sexual slurs, name calling, racist or sexist jokes, negative stereotyping, physical assault, bullying, threats, demeaning pictures, posters and graffiti.

Harassment includes the following categories of behavior, whether the behavior occurs once or many times:

a) Discriminatory behaviour

Discrimination refers to treating people differently, negatively, or adversely because of one or more of the following prohibited grounds of discrimination: race, color, ancestry, place of origin, political belief, religion, age, sex, sexual orientation, marital status, family status, physical or mental disability, or pardoned criminal conviction.

b) Personal harassment

Personal harassment includes objectionable conduct, comment, or display made on either a one-time or continuous basis that demeans, belittles, or causes personal humiliation or embarrassment on the part of the recipient. It may or may not be linked to discriminatory behavior.

c) Sexual harassment

Sexual harassment refers to any conduct, comment, gesture, or contact of a sexual nature, whether on a one-time basis or a series of incidents, that might reasonably be expected to cause offence or humiliation or that might reasonably be perceived as placing a condition of a sexual nature on employment, an opportunity for training or promotion, receipt of services, or a contract. Examples of behavior that can constitute sexual harassment include, but are not limited to:

unwanted touching, patting or leering

sexual assault

inquiries or comments about a person’s sex life

telephone calls with sexual overtones

gender-based insults or jokes causing embarrassment or humiliation

repeated unwanted social or sexual invitations

inappropriate or unwelcome focus/comments on a person’s physical attributes or appearance

d) Bullying

Bullying consists of behavior to attack and diminish another by subjecting the recipient to unjustified criticism and trivial fault-finding, humiliating the recipient (especially in front of others), and/or ignoring, overruling, isolating and excluding the recipient. If from a superior, bullying may include setting up the recipient for failure by setting unrealistic goals or deadlines, or denying necessary information and resources; either overloading the recipient with work or taking all work away (sometimes replacing proper work with demeaning jobs); or increasing responsibility while removing authority.

e) Abuse of authority

Abuse of authority refers to an individual improperly using the power and authority inherent in a position to endanger a person’s job, undermine the performance of that job, threaten the person’s economic livelihood, or in any way interfere with or influence a person’s career. It is the exercise of authority in a manner that serves no legitimate work purpose and ought reasonably to be known to be inappropriate. Examples of abuse of authority include, but are not limited to, such acts or misuse of power as intimidation, threats, blackmail, or coercion.

f) Poisoned work environment

A poisoned work environment is characterized by an activity or behavior, not necessarily directed at anyone in particular, that creates a hostile or offensive workplace. Examples of a poisoned work environment include but are not limited to: graffiti, sexual, racial or religious insults or jokes, abusive treatment of an employee, and the display of pornographic or other offensive material.

Mandatory Procedures in Cases of Harassment:

• Any employee who believes that she or he has been subjected to unlawful harassment of any kind has the responsibility to report the harassment immediately to her or his supervisor. If the employee is uncomfortable reporting the harassment to her or his immediate supervisor (whether because the supervisor has committed the harassment, or for any other reason whatsoever), the employee must report the harassment to the next higher level of management above the immediate supervisor or, if the employee prefers, to the [ Human Resources Director, Chief Financial Officer, or President ] of the company.

• The company is committed to taking all reasonable steps to prevent harassment and will make every reasonable effort promptly and completely to address and correct any harassment that may occur. However, the company cannot take prompt and effective remedial action unless each employee assumes the responsibility of reporting any incident of harassment immediately to an appropriate supervisory employee.

• Every report of harassment will be investigated promptly and impartially, with every effort to maintain employee confidentiality. The complainant and the accused will be informed of the results of the investigation. If the company finds that its policy has been violated, it will take appropriate corrective and remedial action, up to and including discharge.

Reporting Without Fear of Retaliation:

• No employee will be retaliated against for reporting harassment. This no-retaliation policy applies whether a good faith complaint of harassment is well founded or ultimately determined to be unfounded.

• No manager or supervisor is authorized, or permitted, to retaliate or to take any adverse employment action whatsoever against anyone for reporting unlawful harassment, or for opposing any other discriminatory practice in the workplace.

• Any employee who feels he or she has been retaliated against in violation of this no-retaliation policy is responsible for reporting the retaliation to management, in the same manner as any other form of harassment or discrimination should be reported.