

## **PAREX RESOURCES INC.**

### **VIOLENCE AND HARASSMENT PREVENTION POLICY**

#### **1. PURPOSE**

The purpose of this policy is to define what constitutes workplace Violence and Harassment and to provide direction for reporting and investigating workplace Violence and Harassment.

#### **2. SCOPE**

This policy applies to all acts or threats of workplace Violence and Harassment involving employees, volunteers, delegates, students, clients, third party service providers, suppliers and visitors to the Company.

#### **3. COMPANY COMMITMENT**

The management of Parex Resources Inc. ("**Parex**" or the "**Company**") is committed to providing a work environment in which all workers are treated with respect and dignity and is committed to:

- a. maintaining a workplace that is free from all forms of Violence and Harassment;
- b. eliminating, or if that is not reasonably practicable, controlling and minimizing the hazard of Violence and Harassment;
- c. dedicating sufficient resources, time and attention to identify and address factors that contribute to workplace Violence and Harassment;
- d. investigating and resolving incidents of workplace Violence and Harassment in a fair, respectful and timely manner;
- e. taking corrective action, as necessary, based on the circumstances, which may include education, discipline or contacting police authorities; and
- f. assisting workers who have been exposed to workplace Violence and Harassment.

All workers have the right to a workplace that is free from Violence and Harassment, and Parex will not tolerate and strictly prohibits Violence or Harassment by anyone in the workplace.

Parex requires all workers to abide by the policies and procedures contained herein to prevent Violence and Harassment at the workplace. The Company will ensure this Policy is implemented and maintained, and that all workers receive relevant information and instructions. Everyone is obligated to uphold this policy and to work together to prevent workplace Violence and Harassment.

#### 4. DEFINITIONS

**Contractor** means a person, partnership or group of persons who, through a contract, an agreement or ownership, directs the activities of one or more employers or self-employed persons involved in work at a work site.

**Domestic Violence** is a pattern of behaviour used by one person to gain power and control over another with whom a person has or has had a personal relationship. This can range from subtle, coercive forms to violent acts that result in physical harm or death. Domestic Violence becomes a workplace hazard when it occurs or spills over into the workplace. It may place the targeted worker at risk and may pose a threat to co-workers.

**Employer** a person who employs or engages one or more workers, including workers from a temporary staffing agency or a person designated to represent an employer.

**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 of a worker, or adversely affect the worker's health and safety, and includes:

- a. engaging in a course of vexatious comment or conduct, bullying or action against a worker in a workplace 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;
- 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.

Reasonable actions by managers and supervisors to help manage, guide, or direct workers or the workplace are not harassment. These actions include, for example: decisions involving work assignments, job assessment evaluation, workplace inspections, and disciplinary action.

**Parex Calgary HSC** means the Joint Work Site Health and Safety Committee established in the Calgary office, Parex Resources Inc., pursuant to Section 16 of the Occupational Health and Safety Act.

**Sexual Violence** as a workplace hazard refers to any sexual act, attempt to obtain a sexual act, or other act directed against a worker's sexuality using coercion, by any person regardless of their relationship to the victim, in a workplace or work-related setting. Sexual Violence exists on a continuum from obscene name-calling to sexual assault and/or homicide. It includes online form of Sexual Violence, such as internet threats and harassment, and sexual exploitation.

**Supervisor** means a person who has charge of a work site or authority over a worker.

**Train** or any similar term or word means to give information and explanation to a worker with respect to a particular subject matter and to require a practical demonstration that the worker has acquired knowledge or skill related to the subject matter.

**Violence** whether at a work site or work related, means the threat, attempt or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual Violence. This may include any threatening statement or behaviour that gives a worker reasonable cause to believe that the worker is at risk of injury.

**Worker**, in this policy, means employees, consultants and contractors, including temporary staff through any third-party agency.

**Work Site** means a location where a worker is, or is likely to be, engaged in any occupation.

**Work Site Parties** means Workers, Employer, Supervisors and Human Resources.

## 5. POLICY STATEMENT

Parex prohibits and will not tolerate any forms of workplace Violence, including:

- a. Physical attacks or aggression (i.e., hitting, shoving, pushing or kicking a worker).
- b. Threatening behaviour (i.e., trying to hit a worker, destroying property).
- c. Verbal or written threats (i.e., verbally threatening to attack a worker).
- d. Domestic Violence.
- e. Sexual Violence.

Parex prohibits and will not tolerate any forms of workplace Harassment, including but not limited to:

- a. Unwelcome conduct, comments, gestures or contact which causes offense or humiliation (e.g., name calling, harassing phone calls, spreading rumours).
- b. Deliberate misgendering (i.e., referring to a person using terms or pronouns that do not align with the person's affirmed gender).
- c. Physical or psychological bullying which creates fear or mistrust or which ridicules or devalues the individual (e.g., fist shaking, yelling).
- d. Exclusion or isolation of individuals.
- e. Intimidation (i.e., standing too close or making inappropriate gestures/comments).
- f. Cyber bullying (e.g., posting or sending offensive or intimidating messages through social media or email).
- g. Deliberately setting the individual up to fail (e.g., making unreasonable demands, setting impossible deadlines, interfering with work).
- h. Intentionally withholding information or giving the wrong information.
- i. Taking away work or responsibility without cause.
- j. Displaying or circulating offensive pictures or materials in print or electronic form.

The above lists are illustrative only, and not exhaustive. No form of Violence or Harassment will be tolerated by Parex.

## **6. RESPONSIBILITIES OF WORK SITE PARTIES**

All Work Site Parties have a role in preventing workplace Violence and Harassment.

### **6.1 Workers**

- a. Have the responsibility to treat each other with respect and shall refrain from causing or participating in the harassment of or Violence against other workers.
- b. Must report any experienced or witnessed incident of Violence and Harassment.
- c. Are responsible for cooperating in the investigation of a Violence or Harassment complaint, and for keeping any details related to such an investigation confidential.
- d. Must comply with this Policy, and all related Parex policies.

### **6.2 Employer and Supervisors**

- a. Must ensure, as much as possible, that no worker is harassed or subject to Violence in the workplace.
- b. Must not engage in Violence or Harassment.
- c. Must cooperate in the investigation of a Violence or Harassment complaint and must keep any details related to such an investigation confidential.
- d. Must comply with this Policy, and all related Parex policies.

### **6.3 Human Resources**

- a. Must ensure that this Policy is provided to and communicated to all existing and new workers.
- b. Is responsible for investigating, or coordinating the investigation of, all complaints, determining appropriate corrective action as a result of the investigation, and informing the parties involved in the investigation of the results.
- c. Must keep all details related to an investigation confidential.

## **7. HAZARD IDENTIFICATION, ASSESSMENT AND CONTROL**

7.1 Parex is committed to identifying, assessing and controlling the hazards of workplace Violence and Harassment. In order to identify the actual or potential risk of workplace Violence and Harassment, Parex has conducted a hazard assessment to identify potential hazards of workplace Violence or Harassment. The risk assessment considered the following factors:

- a. Incidents of Violence and Harassment in similar workplaces (i.e., external publicly available information).

- b. Previous incidents of Violence in the workplace (i.e., past incident reports, survey of workers).
- c. The general physical environment of the workplace.
- d. The Violence risks associated with the type of work being performed (i.e., working alone).
- e. The attributes of the workforce.

7.2 Where a risk of potential Violence or Harassment has been identified, controls are determined to eliminate or minimize the risk of Violence or Harassment in the workplace. The controls are reviewed by Parex's Joint Work Site Health and Safety Committee, "**Parex Calgary HSC**". These controls include the following physical elements in the workplace and Parex will leverage, where possible, any existing procedures and/or programs that our building provides such as:

- a. The building security has advised that adequate lighting is provided in parking lots, stairwells, building entrances/exits, etc., including 24/7 lighting in all areas that will take effect in the event of building emergencies.
- b. The building security has advised that several cameras are always functional in key areas throughout the building, e.g., building entrances/exits, parkades, stairwells and bicycle parking cage. Building security personnel conduct frequent foot patrols throughout all areas of the building, including stairwells and parkades. Emergency call stations are located throughout the building, including several locations on each level of the parkade, fitness centre and bicycle parking cage.
- c. Controls of Access Cards to building/floors – Access Card controls are set for employees with 24/7 access, but Visitor Card controls are set with limited access, usually for regular office hours. The Access Card records are audited internally on a quarterly basis to validate any new records of activation or deactivation during the period. The exterior of the building is locked at 6:00 p.m. and anyone entering the building after hours requires an Access Card to gain entry, including access to elevator banks to enter office floors. Parex Access Cards do not have a company name printed on them to ensure no one can gain access to our floors in the event of a lost card.

In addition, the following safe work procedure is provided by the building:

- A Safe Walk Program is offered through the building, so that you can ask for a security escort to your car in the building parkade, bicycle parking cage, nearby parking lot or to the nearest train station by calling the Building Security at 403-592-2870 24 hours a day, with at least 10 minutes notice.

These procedures will be provided to workers as part of their workplace Violence and Harassment prevention training, and can be found at [S:/Common/Corporate Policies and Procedures/Policies & Procedures/Current Corporate Policies & Procedures](#).

If Parex identifies a risk of Violence, or in the event of Violence within a Parex workplace, Parex will ensure that workers will be informed of the nature and extent of the risk at the necessary times. This includes information related to the risk of Violence from persons who have a history of violent behaviour and whom workers are likely to encounter in the course of their work, and information related to any work site or worker position that has been, or may reasonably be, expected to be exposed to Violence. When providing

workers with this information, Parex will disclose only the minimum amount of personal information necessary.

This information will be provided to the applicable workers via Email communication and can be found at [S:/Common/Corporate Policies and Procedures/Policies & Procedures/Current Corporate Policies & Procedures.](#)

## **8. TRAINING AND EDUCATION**

Parex is committed to ensuring that all workers will be trained in:

- a. the recognition of Violence and Harassment;
- b. the policies, procedures and workplace arrangements that the employer has developed and implemented to eliminate or control the hazards of Violence and Harassment;
- c. the appropriate response to Violence and Harassment, including procedures for obtaining assistance; and
- d. the procedures for reporting, investigating and documenting incidents of Violence and Harassment.

This training will be provided to workers during onboarding and resources will be available for all employees to review at [S:/Common/Corporate Policies and Procedures/Policies & Procedures/Current Corporate Policies & Procedures.](#)

Ongoing training will be provided to workers as new work processes or conditions arise, or when new hazards are identified.

## **9. REPORTING, INVESTIGATING AND DOCUMENTING INCIDENTS**

9.1 All incidents and alleged incidents of workplace Violence or Harassment, regardless of magnitude or who it may involve, will be treated seriously and must be reported immediately. If necessary, workers can summons immediate assistance by dialing 9-1-1.

- a. All incidents of workplace Violence or Harassment will be reviewed by a senior member of Human Resources in a prompt, confidential and impartial manner. This review may include a consultation with a third-party company.
- b. If after the initial review of an incident or alleged incident, it is determined that an investigation is necessary, Human Resources or the Company shall appoint a third-party company to conduct a full investigation on behalf of Parex.

9.2 Workers are encouraged to use the following steps to report incidents of alleged Violence or Harassment, whether experienced or witnessed:

- a. Incidents should be reported as soon as possible after experiencing or witnessing an incident using Parex's Violence and Harassment Incident Report Form (attached as "**Appendix A**"),

alternatively this form can be found at [S:/Common/Corporate Policies and Procedures/Policies & Procedures/Current Corporate Policies & Procedures.](#)

- b. Workers can report incidents of workplace Violence or Harassment as follows:
  - i. to Human Resources or to their immediate supervisor;
  - ii. If the first avenue of communication is unfeasible, the worker should go to the Chief Executive Officer (“CEO”). Based on the CEO’s discretion, outside legal counsel should be contacted, and they shall obtain a third-party investigator;
  - iii. if there is a complaint against the CEO, then the worker should go to the Governance Committee Chair of the Board of Directors or to the Corporate Services Vice President.

9.3 When reporting incidents, workers should provide as much detail as possible including:

- a. The names of parties involved;
- b. Any witnesses to the incident(s);
- c. The location, date and time of the incident(s);
- d. Details about the incident(s) (behaviour and /or words used); and
- e. Any additional details that would help with the investigation.

9.4 Once an Incident Report Form is received, Human Resources or assigned personnel will meet with each party separately to explain the investigating process, including:

- a. the expected timetable;
- b. overall process;
- c. roles and responsibilities of anyone involved in the investigation;
- d. confidentiality of the investigation; and
- e. interim measures to limit the potential for Violence and Harassment.

9.5 The investigation will be focused on fact-finding, and the investigator (external to Parex) will:

- a. collect facts on who, what, when, where and how the incident occurred;
- b. record all pertinent information;
- c. recommend corrective action; and
- d. consider changes in controls, procedures and policies.

- 9.6 At the completion of an investigation, the investigator shall provide Human Resources with a written report outlining the circumstances of the incident and any recommendations, including those for corrective action.
- 9.7 Following the conclusion of the investigation, Human Resources and the Company will inform the complainant and the alleged offender of the results of the investigation, and any corrective action to be taken to address the incident.
- 9.8 Where Violence or Harassment has been substantiated, the Company shall also attempt to implement controls intended to prevent a recurrence of the workplace Violence or Harassment.

All investigation reports will be retained for two years after the incident and kept readily available for review by an Alberta Occupational Health and Safety Officer.

## **10. CORRECTIVE ACTION AND DISCIPLINE**

Workers who are found in breach of this Policy will be subject to reasonable corrective action to prevent future incidents. Depending on the circumstances, appropriate corrective action may include, but is not limited to:

- a. an apology;
- b. counselling;
- c. training;
- d. referral to an assistance program (i.e., Anger Management); or
- e. disciplinary action (i.e., termination of employment).

## **11. WORKER SUPPORT**

Workers that have experienced workplace Violence or Harassment should consult a health professional of the worker's choice for treatment or referral and should consider accessing services and resources through Parex's Employee and Family Assistance Program ("**EFAP**"). To access Parex's EFAP, employees should contact **LifeWorks** at 1-833-300-9511 (user ID: groupsource) to receive confidential and immediate support.

Workers are entitled to wages and benefits while attending treatment programs for workplace Violence or Harassment, if the treatment sessions occur during regular work hours.

## **12. CONFIDENTIALITY**

Parex will not disclose the circumstances related to an incident of Violence or Harassment or the name(s) of the complainant, the person(s) alleged to have committed the Violence or Harassment, and any witness(es), except:



- a. where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident;
- b. as required by law; or
- c. with respect to incidents of Violence only, where necessary to inform workers of a specific or general threat of Violence or potential Violence.

Parex will disclose only the minimum amount of personal information that is required with respect to point (c) above.

### **13. RETALIATION AND OTHER COMPLAINTS**

Parex strictly prohibits any form of discipline, reprisal, intimidation or retaliation against a person who: (i) reports any incident of workplace Violence or Harassment to the Company in good faith; (ii) files any workplace Violence or Harassment complaint in good faith; or (iii) cooperates in related workplace Violence and Harassment investigations.

This Policy is not intended to discourage or prevent a worker from exercising the worker's rights, remedies or action pursuant to any other law, including the *Alberta Human Rights Act*. Workers shall always retain the right to exercise any other legal avenues available.

### **14. POLICY EVALUATION AND MONITORING**

Parex will review and revise, if necessary, this Policy on the earliest of the following:

- a. when an incident of Violence or Harassment occurs;
- b. if the joint work site health and safety committee recommends a review of the plan; or
- c. every three years.

The review shall focus on whether this Policy is current and if there are any gaps or deficiencies that need to be addressed.

### **15. REFERENCES**

- a. Alberta, *Occupational Health and Safety Act*
- b. Alberta, *Occupational Health and Safety Code*
- c. Alberta, *Occupational Health and Safety Regulation*

**16. OTHER RELATED POLICIES**

- a. Parex’s Occupational Health and Safety Policy
- b. Parex’s Code of Conduct

**17. QUESTIONS**

This Policy is readily available to all workers at *S:/Common/Corporate Policies and Procedures/Policies & Procedures/Current Corporate Policies & Procedures.*

Should a worker have any questions or require more detailed information concerning this Policy, they are to contact Human Resources.

**18. DOCUMENT HISTORY**

Version	Date	Reason for Policy Revision / Update	Scheduled Policy Review Date is every 3 years (unless otherwise required as per Section 9 of this Policy)
0	INSERT DATE	Initial policy rollout	INSERT DATE 3 YEARS FROM APPROVAL DATE

Process	Name	Title	Signature
Edited	Linda Michalski	Senior Human Resources Advisor	
Reviewed and Accepted by Health & Safety Committee Worker Representatives	Christa Welsh	Senior Geologist	
	Ximena España	Legal Counsel	
Recommended	Josh Share	VP Corporate Services	
Approved	Dave Taylor	President & CEO	

**APPENDIX A**

**INCIDENT REPORT FORM**

This form is to be completed by an employee/individual who has allegedly been harassed or bullied in the workplace. When completed, it should be submitted in agreement with section 9.2 b of the policy.

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**1. Complainant Information**

Name: \_\_\_\_\_ Department: \_\_\_\_\_

Position \_\_\_\_\_ Title: \_\_\_\_\_

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**2. Respondent Information**

*If your complaint has more than one Respondent, please complete a separate complaint form for each.*

Name: \_\_\_\_\_ Department: \_\_\_\_\_

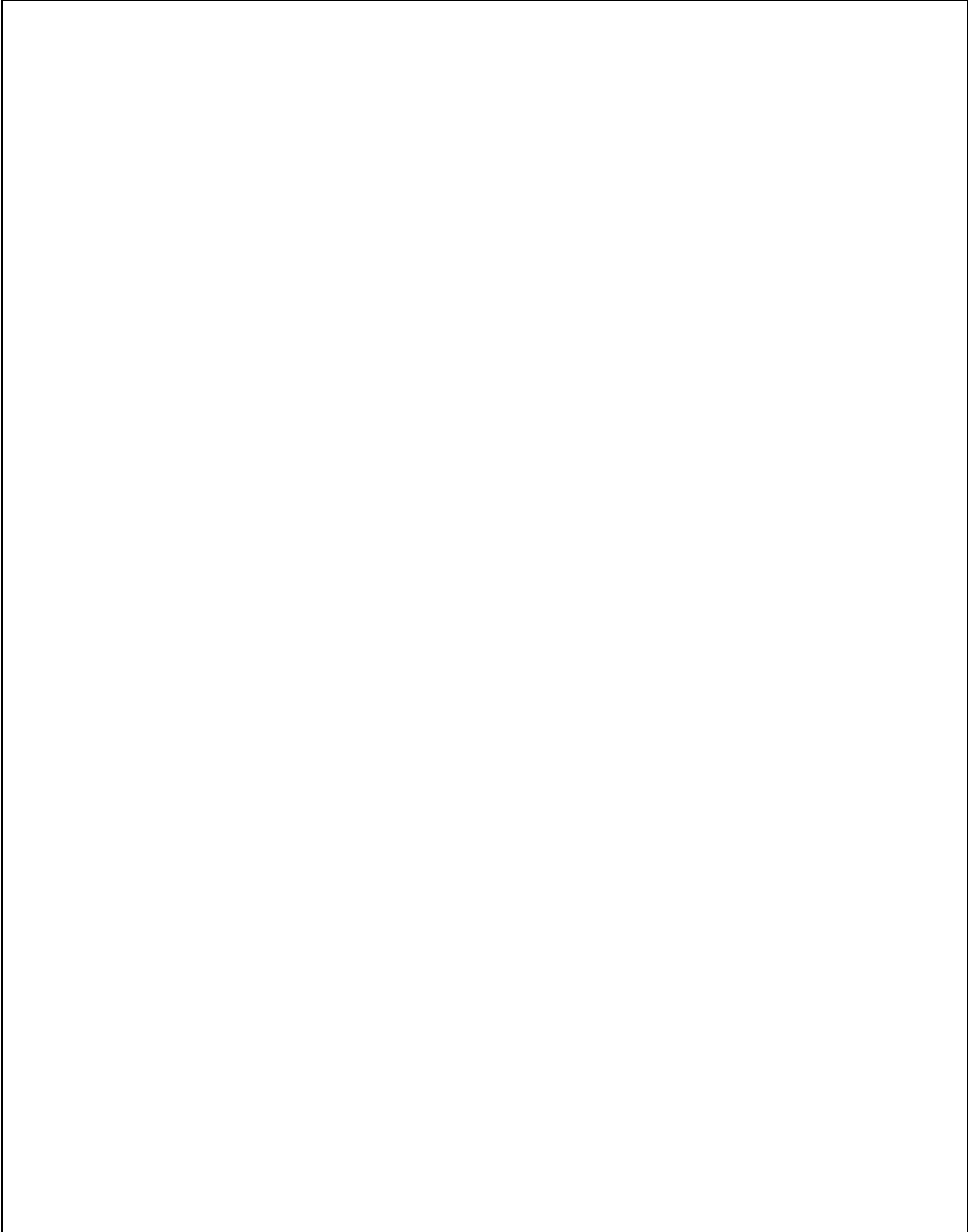
Position \_\_\_\_\_ Title: \_\_\_\_\_

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**3. Description of Alleged Harassment/Bullying**

Please describe, in as much detail as possible, the incident(s) of alleged harassment. Please include:

- who was involved;
- what was specifically said or done (words, tone, actions, etc.);
- when it happened (dates and times);
- where it happened;
- any witnesses to the incident(s) described (names and contact information, if possible);
- how the incident(s) impacted you; and
- if the incident(s) was reported to management (please provide details - who, when, what action was taken, etc.).



#### 4. Relevant Time Period

When did the alleged harassment or bullying begin?

\_\_\_\_\_

When did the most recent incident of alleged harassment or bullying occur?

\_\_\_\_\_

<b>Summary</b>	<b>Yes</b>	<b>No</b>	<b>Unsure</b>
Involves a single incident of alleged harassment/bullying			
Involves physical contact and/or assault			
Involves verbal abuse and/or threats			
Involves reprisal and/or retaliation			
Involves abuse of authority (use of authority serving no legitimate work purpose)			
Involves sexual harassment (harassment which is gender-based/of a sexual nature)			
Involves discriminatory harassment (based on prohibited ground of discrimination)			

## 5. Signature

I certify the information provided in this complaint to be accurate, true and complete to the best of my knowledge. I understand that I will not be subject to any adverse treatment as a result of making this complaint, provided that it has not been made for an improper purpose.

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<b>Name (Please Print)</b>	<b>Signature</b>	<b>Date</b>
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## 6. Interim Measures

	<b>Yes</b>	<b>No</b>
Do you believe that the Employer needs to take any interim measures pending resolution of your complaint (e.g. separation of Parties, workspace relocation)?		

If yes, please describe the requested measure and the reason why you think it is necessary.

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## 7. Other Processes

	<b>Yes</b>	<b>No</b>
Have you initiated any other process to deal with these allegations of harassment (e.g. grievance, Human Rights complaint, legal action, etc.)?		

If yes, please provide details of the process, including the status.