



**ADVANTAGE ENERGY LTD.
("Advantage")**

WORKPLACE HARASSMENT POLICY

The purpose of this document is to outline Advantage's Workplace Harassment Policy.

Advantage is committed to ensuring all workers, including employees, contractors and service providers, of their right to work in an environment free from harassment, and to be treated with dignity and respect. This policy underscores the seriousness of harassment in the workplace and urges all workers to work toward its elimination either as a participant or an observer.

Advantage is committed to eliminating the hazard of harassment, or if the hazard cannot be eliminated, it will be controlled. There is no acceptable level of harassment at Advantage.

This policy applies at all Advantage buildings and work sites. This policy covers harassment that happens away from the workplace when there is a negative impact on working relationships. Harassment of Advantage workers by anyone including any manager, supervisor, co-worker, vendor, client or customer will not be tolerated.

What is Workplace Harassment?

Workplace harassment is 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 affect the worker's health and safety, and includes:

- (i) conduct, comments, bullying or actions 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.

The behaviour need not be intentional in order to be considered harassment.

Workplace harassment does not include any reasonable conduct of Advantage or a supervisor related to the normal management of workers or a work site.

Examples of Harassment

While the following is not an exhaustive list, harassment may include:

- verbal abuse or threats;
- unwelcome remarks, jokes, innuendoes or taunting about a person's body, attire, age, marital status, ethnic, national origin, religion, mental characteristics, sexual orientation etc.;
- displaying pornographic, sexually explicit, racist, sexist, or other offensive or derogatory notes/ pictures, cards, cartoons;

- transmitting or downloading offensive material through any form of electronic media such as the internet, e-mail or fax machines;
- practical jokes which cause awkwardness or embarrassment;
- unwelcome invitations or requests, whether indirect or explicit, or intimidating;
- leering or other gestures;
- unnecessary physical contact such as offensive or unnecessary touching, physical assault or impeding or blocking movement; or
- abuse of authority.

Retaliation against anyone who has reported harassment is not permitted.

Responsibilities

Advantage Responsibilities

Advantage is responsible for ensuring, as far as reasonably practicable, that its workers are not subject to or participate in harassment at the work site, and for ensuring that this policy and the supporting procedures are implemented and maintained. Advantage is also responsible for ensuring that workers are trained in:

- the recognition of harassment;
- the policies, procedures, and workplace arrangements that Advantage has developed and implemented to eliminate or control the hazard of harassment;
- the appropriate response to harassment, including procedures for obtaining assistance; and
- the procedures for reporting, investigating and documenting incidents of harassment.

Supervisor and Management Responsibilities

Supervisors and management are responsible for ensuring, as far as reasonably practicable, that workers under their supervision are not subject to or participate in harassment at the work site, and for complying with this policy.

Worker Responsibilities

Workers should attempt to stop any unwelcome behaviour that is brought to their attention and to maintain an awareness of what behaviour is appropriate and acquaint themselves with this policy and its procedures. Workers must refrain from causing or participating in harassment at the work site, and are responsible for cooperating in the investigation of a workplace harassment complaint. Workers must comply with this policy.

Any questions concerning the intent, application or implementation of this policy and its procedures should be directed to your direct supervisor or the Chief Financial Officer.

Complaint Procedures

Advantage is committed to taking appropriate action when complaints of harassment occur. This policy offers a flexible response to address employee complaints through both formal and

informal complaint procedures. Advantage maintains the right to determine the formal investigation process and to designate who shall complete an impartial investigation.

First Step: Informal Procedure

Individuals are encouraged, if appropriate, to advise others when their behaviour is unwelcome, asking them to stop verbally or in writing.

Second Step: Formal Investigation

1. Procedure for Receiving a Complaint

If the informal procedure is not appropriate or does not cause the alleged conduct to cease, workers may make a formal complaint. All workers are encouraged to report incidents of workplace harassment as soon as possible after experiencing or witnessing an incident. A complainant can file a written, signed complaint that is sent to their immediate supervisor or the Chief Financial Officer. Keep a record of incidents (date, times, locations, possible witnesses, what happened, your response).

2. Investigating and Documenting Incidents

Once a complaint is received, Advantage will assess the risk to the complainant and will take actions necessary to alleviate such risk. Advantage will also review the complaint and determine whether the conduct falls within this policy, and if so, the Chief Financial Officer (or designate) will assign personnel (either internal or external to Advantage) to conduct an impartial investigation. Advantage is committed to investigating all incidents and complaints of workplace harassment in a fair, respectful and timely manner.

The Chief Financial Officer (or designate) will discuss the investigation process with the complainant and the respondent separately, including: the expected timetable, the overall investigation process, the roles and responsibilities of anyone involved in the investigation, the confidential nature of the investigation, and any interim measures to limit the potential for harassment.

During the investigation, the investigator will interview the complainant, the respondent and any other individuals whom the investigator believes to have direct knowledge of, or relevant information about, the conduct alleged in the complaint. The respondent will be provided the opportunity to respond to the allegations. The investigator may collect and review any relevant documents related to the complaint.

3. Investigation Report

Following the conclusion of the investigation, the investigator shall prepare an investigation report, outlining the circumstances of the incident and the corrective action. Advantage will retain the investigation report for at least two years after the incident. The investigation report will be maintained in a confidential file separate from the employee personnel file. Whenever a complaint is substantiated, the personnel file of the respondent will be documented accordingly.

The Chief Financial Officer (or designate) will separately inform the complainant and the respondent of the results of the investigation, and any corrective action to be taken to address the incident.

4. Corrective Action

Advantage will take corrective action to address all substantiated incidents of workplace harassment. The corrective actions taken will be proportionate to the seriousness of the offence. Possible corrective actions include, workplace education, conflict resolution, individual one on

one counselling, negotiated resolution between the parties, or discipline up to and including dismissal.

5. Confidentiality

Confidentiality cannot be guaranteed; however, the intent of the policy and the process is to respect the privacy of all those involved as much as possible. The names of the parties involved in a complaint of workplace harassment (including the complainant, the respondent and any witnesses), and the circumstances related to the complaint will not be disclosed to anyone, except as necessary to investigate the incident or to take corrective action, to inform the parties involved in the incident of the results of the investigation and corrective action taken, or as required by law.

6. Timeliness

It is the intention of this policy that the investigation of the complaint will begin promptly and proceed without undue delay. All workers are responsible for bringing their concerns forward in a timely manner to ensure a complete investigation can be accomplished.

No Retaliation and Other Rights

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving harassment. This policy is not intended to discourage a worker from exercising rights pursuant to any other law, including the *Alberta Human Rights Act*.

Worker Support

Any worker that has reported an injury or adverse symptom resulting from an incident of harassment is advised to consult a health care professional of the worker's choice for treatment or referral.