

WORKPLACE HARASSMENT & VIOLENCE POLICY:

The purpose of this document is to outline ADVANTAGE ENERGY LTD.'s Workplace Harassment and Violence policy.

ADVANTAGE ENERGY LTD. is committed to ensuring employees and contractors of their right to work in an environment free from harassment, discrimination or violence, and to be treated with dignity and respect. This policy underscores the seriousness of harassment or violence in the workplace and urges all employees to work toward its elimination either as a participant or an observer. There is no acceptable level of harassment or violence at ADVANTAGE ENERGY LTD.

This policy applies at all ADVANTAGE ENERGY LTD. buildings and work sites. This policy covers harassment and violence that happens away from the workplace including but not limited to camps and other remote sites when there is a negative impact on working relationships. Harassment or violence of ADVANTAGE ENERGY LTD. employees and contractors by anyone including any manager, supervisor, co-worker, vendor, client or customer will not be tolerated.

What is Workplace Harassment?

Workplace harassment is any comment, conduct or gesture (whether verbal, physical or visual) based on a person's protected status that ought reasonably to be known to be unwelcome, that denies individual dignity or respect and is likely to offend or humiliate any employee, employment candidate or member of the general public, which might reasonably be perceived as placing a condition on any opportunity for employment, training or promotion; or, which creates an intimidating or offensive working environment.

It is important to note that feedback on performance expectations is **not** workplace harassment.

Harassment includes unwelcome behaviour based on prohibited grounds of discrimination such as: race, place of origin, ethnic origin, colour, religious beliefs, age, gender, marital or family status, source of income, physical or mental disabilities, sexual orientation or any other prohibited ground covered by human rights legislation.

The behaviour need not be intentional to be considered harassment.

What is Workplace Violence?

Violence in the workplace could put the worker at risk of physical or psychological harm. Violence can include a physical attack or aggression, threatening behaviours, verbal and/or written threats, domestic violence, and sexual violence.

Violence and harassment are workplace hazards and must be addressed during a hazard assessment.

Complaint Procedures

ADVANTAGE ENERGY LTD. is committed to taking appropriate action when complaints of harassment or violence occur. This policy offers a flexible response to address employee complaints through both formal and informal complaint procedures. ADVANTAGE ENERGY LTD. maintains the right to determine the formal investigation process and to designate who shall complete an impartial investigation.

First Step: Informal Procedure

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

Second Step: Formal Investigation

- Should the complaint not be resolved at this point, or ADVANTAGE ENERGY LTD. determines that a formal investigation is necessary, the investigation process will be as follows:

1. Procedure for Receiving a Complaint

If, after the informal procedure, the behaviour does not stop, the complainant can file a written, signed complaint that is sent to the Manager, Human Resources & Administration, or their immediate supervisor. Keep a record of incidents (date, times, locations, possible witnesses, what happened, your response). The risk to the individual will be assessed and any actions necessary to alleviate those risks will be taken. The complainant will be interviewed and the next steps and possible resolutions to the complaint will be discussed at that time. The complainant will be advised not to discuss the matter with anyone outside the investigation.

2. Procedure for Interviewing the Respondent

The Manager, Human Resources & Administration (or designate), and the immediate supervisor (or designate) will meet with the respondent to give them a copy of the complaint. The respondent should be advised of their right to provide an explanation and to be given proper consideration of those explanations. They will be advised not to discuss the matter with anyone outside the investigation (those who need to know). The allegation(s) will be discussed, along with avenues for addressing any potential retaliation arising out of the complaint. There will be a request that no contact of any kind with the complainant be made until the investigation is complete. The next steps and possible resolutions will be discussed.

3. Procedure for Interviewing Witnesses

Only those who have direct knowledge of the circumstances or the context of the complaint will be interviewed. These parties will be advised of the need for confidentiality.

4. Investigation Report

The investigator(s) will document the interviews and complete a preliminary investigation report including the following:

- an overview of the complaint;
- the response to the complaint;
- general summary of the witnesses(s) statements with no names attached;
- findings;
- recommendations for resolution;
- report of preliminary findings is reviewed with the complainant and the respondent;
- further investigation or final report is completed and sent to the Manager, Human Resources & Administration, or the immediate supervisor for decision/remedy where appropriate;
- case closed if no further monitoring or action is required.

5. Possible Actions to be Taken

The actions taken will be proportionate to the seriousness of the offence. Possible actions include, workplace education, conflict resolution, individual one on one counselling, negotiated resolution between the parties, or discipline up to and including dismissal.

To ensure that the harassment has been resolved, a monitoring mechanism will be established with agreed upon timelines.

6. General

The Investigators' report including interviews, evidence and the outcome will be maintained by the Manager and Human Resources & Administration and kept on file. All documents related to the complaint 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.

7. 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 name of the complainant, the respondent, and the circumstances related to the complaint will only be disclosed as necessary to those involved in the investigation or disciplinary measures related to the complaint, or as required by law.

8. Timeliness

The investigation of the complaint will begin promptly and proceed without undue delay. All Employees and contractors are responsible for bringing their concerns forward in a timely manner to ensure a complete investigation can be accomplished.

The time frame for accepting complaints will follow the Alberta Human Rights guidelines.

9. Responsibilities

- **Management Responsibilities:**

Management is responsible for developing and informing employees and contractors on the company policies and procedures for handling complaints of harassment and violence, conducting investigations and liaising with legal counsel as required, informing the complainant and respondent of the outcome of the investigation, and taking appropriate action when harassment or violence has been identified.

- **Employees and contractors:**

Employees and contractors 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 the Workplace Harassment and Violence policy and procedures.

Any questions concerning the intent, application or implementation of this policy and procedure should be directed to the Manager and to Human Resources & Administration.

Please refer to our Health and Safety Management System Manual.