



## WORK SITE HARASSMENT PREVENTION POLICY

### ALBERTA

#### A. Policy statement

**Homestead Land Holdings Limited** (“Homestead” or “company”) is committed to providing a safe and healthy work site in which all individuals are treated with respect and dignity. To that end, Homestead is committed to eliminating and controlling the hazard of harassment. Harassment will not be tolerated from any person in the work site. **Homestead** expects all its workers (all employees including managers, contractors, and other individuals who perform work at Homestead’s work sites) to be dedicated to preventing and eliminating work site harassment.

#### B. Purpose of harassment policy

This policy is intended to:

1. Create and foster a work environment free from work site harassment;
2. Provide a definition of work site harassment;
3. Establish and detail the responsibilities of all workers in the company to maintain a work site free of harassment;
4. Ensure that incidents of work site harassment are reported to management/Human Resources and/or law enforcement, as appropriate;
5. Ensure that complaints of work site harassment are handled in a timely and equitable manner.

#### C. Scope and application of policy

This policy applies to all **Homestead** workers regardless of position or classification. This policy also applies to all persons who attend **Homestead** work sites including, but not limited to, all visitors, tenants, contractors, vendors, and delivery persons.

For the purposes of this policy, **Homestead’s** work site includes all places where **Homestead** business occurs and includes all:

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- **Homestead** buildings and surrounding perimeter including parking lots, sidewalks, and driveways (“company grounds”);
- **Homestead** vehicles;
- Off-site locations where business occurs;
- **Homestead** sponsored functions and recreational or social events, whether taking place on Company Grounds or elsewhere; and
- Travel for business.

## D. Workplace harassment defined

In this policy, 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, humiliation to a worker, or adversely affects the worker’s health and safety, and includes:

- conduct, comment, bullying or action 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, or sexual orientation;
- a sexual solicitation or advance;
- but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site.

Examples of work site harassment includes, but are not limited to:

- Jokes or innuendos that are offensive, demeaning, insulting, or intimidating
- Displaying or sharing pictures or material that is offensive
- Unwelcome phone calls or emails
- Inappropriate sexual touching, advances, suggestions, or requests

Harassment may relate to a form of discrimination prohibited by the *Human Rights Act*. Where such harassment is suspected, **Homestead’s Human Rights**



**Policy** also applies. For purposes of this Policy, harassment need not be based on one of the grounds protected by the *Human Rights Act*.

This is the companion policy to **Homestead's Work Site Violence Prevention Policy** which addresses conduct that is not covered by this policy.

**E. Responsibilities and obligations**

It is the responsibility of:

**1. The Company**

- To take reasonable preventative measures to protect workers and others in work sites from workplace harassment;
- To ensure that none of the company's workers are subjected to or participate in harassment at the work site;
- To conduct a work site harassment assessment;
- To consult the joint work site health and safety committee (or health and safety representative, as applicable) in the development, implementation and review of this policy;
- To ensure that all workers are trained in this policy;
- To investigate any incidents of harassment and take corrective action to address the incidents;
- To ensure that a worker reporting an injury or adverse symptom resulting from an incident of harassment is advised to consult a health professional of the worker's choice for treatment or referral;
- To post this policy in a conspicuous place in the work site;
- To ensure that this policy is communicated to contractors and other persons who attend company work sites;
- To ensure the process for reporting and responding to incidents of work site harassment is communicated, maintained, and followed;
- To ensure that this policy is reviewed as necessary.

## 2. **Managers/Supervisors**

- To understand and abide by the requirements of this policy;
- To communicate and review this policy with the workers they supervise or manage;
- To ensure that no workers under their supervisor's supervision are subjected to or participate in harassment at the work site;
- To verify that all contractors and others who attend company work sites are aware of this policy;
- To encourage workers (i) to resolve concerns informally, by advising the person who engaged in the offending conduct that it is unwelcome and requesting that it cease immediately, and (ii) where this is impractical/unreasonable in the circumstances or has been ineffective, to report complaints or incidents of work site harassment;
- To respond to all complaints or incidents of work site harassment in a professional manner appropriate for the circumstances of the complaint or incident;
- To communicate to Human Resources all incidents of work site harassment.

## 3. **Workers (including managers)**

- To comply with this policy at all times by treating all others in the work site with respect and dignity;
- To refrain from causing or participating in harassment;
- Where it is reasonable to do so, to attempt to resolve any concerns informally by respectfully and discretely advising the person engaged in the offending conduct that it is unwelcome and requesting that it cease immediately;
- To report any incident of work site harassment to his/her manager, where approaching the person engaged in the offending conduct proves ineffective or is impractical/unreasonable;

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- To participate in training regarding this policy and procedures directed at work site harassment in the work site; and
- To fully cooperate in any investigation of complaints or incidents of work site harassment or breaches of this policy.

## F. Complaint and Investigation Procedure

- Where the worker has attempted to discuss his/her concerns about harassment with the person who engaged in the offending conduct and such discussion proves ineffective in resolving the worker's concerns OR where, in the circumstances, it is impractical/unreasonable for the worker to do so, the worker should make a written report of the incident of harassment to his/her manager;
- The incident report should include:
  - the name of the individual(s) engaging in the offending conduct;
  - the date(s), time(s) and location(s) of the incident(s);
  - a description of the incident(s) (*i.e.* what happened);
  - a list of any potentially relevant documents (*e.g.* text messages, emails, voice recordings); and
  - a list of potential witnesses.
- If the alleged harasser is the workers supervisor or manager, the worker should report the incident directly to a Human Resource representative. If the worker does not feel comfortable reporting the incident to their manager or Human Resources, the worker should report to the incident to Jim Minnes, Senior Vice President – Human Resources.
- Homestead will promptly and fairly investigate any incidents of harassment and take corrective action to address the incidents. Homestead will appoint an investigator to conduct the investigation. The investigator may be a member of the management team, the



Human Resources department, or a third party appointed by Homestead.

- The investigator may disclose the circumstances related to an incident of harassment or the name of the complainant, the person alleged to have committed the harassment, and any witnesses only where such disclosure is 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. Complete confidentiality cannot be guaranteed.
- The investigation will include:
  - A documented interview with the complainant;
  - A documented interview with the alleged perpetrator(s);
  - A documented interview with any witnesses to the incident(s);
  - A review of any relevant documents (*e.g.* emails, text messages, security camera footage); and
  - Any other step the investigator deems necessary to investigate the complaint or incident fully and fairly.
- At the conclusion of an investigation into an incident or complaint, the investigator will prepare a written report which will include the findings of fact and the investigator's conclusions.
- The worker who allegedly experienced the harassment and alleged harasser will be informed in writing of the investigation results and the corrective action to be taken to address the incident, if any.
- Where the investigation reveals a breach of this or another policy, the offender(s) may be disciplined up to and including dismissal from employment for just cause.

**G. No discriminatory action**

Work site harassment and this policy are serious matters. This policy prohibits discriminatory action against employees who have made good faith complaints,

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participated in an investigation, or otherwise provided information regarding a complaint or incident of work site harassment. Employees who engage in discriminatory action or threats of discriminatory action may be disciplined up to and including dismissal from employment for just cause.

Discriminatory action includes:

- any action or threat of action by a person that does or would adversely affect a worker with respect to any terms or conditions of employment or opportunity for promotion;
- termination, layoff, suspension, demotion or transfer of a worker, discontinuation or elimination of a job, change of a job location, reduction in wages, change in hours of work, reprimand, coercion, intimidation or the imposition of any discipline or other penalty.

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

This policy is not intended to discourage a worker from exercising rights pursuant to any other law, including the *Human Rights Act*.

## H. Policy review


This Policy will be reviewed on the earliest of the following:


- a. when an incident of harassment occurs;
- b. the joint work site health and safety committee (or the health and safety representative, as applicable) recommends a review of the plan;
- c. every three (3) years.


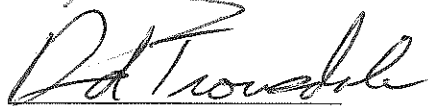
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## I. Document Retention

Copies of the incident report, the investigation report and all documents reviewed or created in the process of the investigation will be retained for at least (3) years from the date the investigation is completed.

  
A. B. Smith  
Executive Chairman

  
Francine Moore  
President

  
  
David Trousdale & Martin Woock  
Chief Operating Officer(s)

  
Jim Minnes  
Senior Vice President, Human Resources

July 26, 2023  
Date