



## WORK SITE VIOLENCE PREVENTION POLICY

### ALBERTA

#### **A. Policy statement**

**Homestead Land Holdings Limited** (“Homestead” or the “Company”) is committed to eliminating and controlling the hazard of actual, attempted or threatened violence at its work sites. **Homestead** recognizes that workplace violence is a health and safety and human resources issue and will take reasonable precautions to prevent work site violence and to protect workers (all employees including managers, contractors, and other individuals who perform work at Homestead’s work sites) at the work site.

#### **B. Purpose of workplace violence policy**

This policy is intended to:

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

- **Homestead** buildings (whether owned or leased) 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. **Work site violence defined**

In this policy, work site “violence”, whether at a work site or work-related, means the threatened, attempted, 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.

Examples of work site violence include, but are not limited to, the following:

1. A physical act or acts, or attempting a physical act or acts, such as punching, hitting, kicking, pushing, damaging property, or throwing objects.
2. An action or statement (or series of actions or statements) reasonably believed to be a threat of physical or psychological harm or a threat to safety or security in the work site. Threats can be made verbally or in writing (*e.g.* notes, emails).
3. Bringing a weapon of any kind to the work site or possessing a weapon of any kind while carrying out business or threatening to bring a weapon to the work site.
4. Driving a vehicle or piece of equipment in an erratic or dangerous manner.
5. Psychologically damaging behaviour.

This is the companion policy to **Homestead’s Work Site Harassment Policy**, which addresses conduct that is not covered by this policy.

#### E. **Zero tolerance**

**Homestead** values the health and safety of its employees and expects that its work site(s) will be free of workplace violence. **Homestead** will not tolerate

incidents of work site violence perpetrated against or by any worker, customer, vendor, contractor, visitor, or any other person involved in company business or on company grounds.

Every person at a company work site is responsible for acting in compliance with this policy.

With respect to acts of work site violence, as defined in this policy, **Homestead** may, where appropriate:

- Remove the perpetrator from the work site by security or the police;
- Discipline any employee, up to and including dismissal for just cause; and
- Report the conduct of any other person to their supervisor, manager, and Human Resources and/or to the police.

**F. Responsibilities and obligations**

It is the responsibility of:

**1. The Company**

- To take reasonable preventative measures to eliminate or control, and to protect workers and others from, the hazard of violence. Such measures include the following:
  - To ensure none of the company's workers are subjected to or participate in violence at the work site;
  - To conduct a work site violence 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 develop procedures to address the work site violence risks identified in the violence assessment;
  - To ensure that all workers are trained in this policy;
  - To investigate any incidents of violence and take corrective action to address the incidents;

- To ensure that a worker reporting an injury or adverse symptom resulting from an incident of violence 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 violence is communicated, maintained, and followed; and
- To ensure that this policy is reviewed as often as is necessary.

## **2. Managers/Supervisors**

- To understand and abide by the requirements of this policy;
- To communicate and review this policy with the employees they supervise or manage;
- To ensure that none of the workers under the supervisor's supervision are subjected to or participate in violence at the work site;
- To verify that all contractors and others who attend Company work sites are aware of this policy;
- To encourage employees to report complaints or incidents of work site violence;
- To respond to all complaints or incidents of work site violence in a professional manner appropriate for the circumstances of the complaint or incident;
- To promptly report all complaints or incidents of work site violence they receive or witness to the appropriate manager or to Human Resources.

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

- To refrain from causing or participating in violence;

- To comply with this policy at all times to protect themselves and others in the work site from work site violence;
- To immediately notify their manager or other designated person of any incident of work site violence, whether or not the notifying worker is the victim.
- In the case of an imminent threat of physical harm to themselves or any person from work site violence, the worker should immediately seek safety and, only when it is safe to do so, the worker should contact the police;
- To participate in training regarding this policy and procedures directed at work site violence risks in the work site; and
- To fully cooperate in any investigation of complaints or incidents of work site violence or breaches of this policy.

#### **G. Domestic violence**

If Homestead becomes aware that a worker is or is likely to be exposed to domestic violence at a work site, Homestead shall take every precaution reasonable in the circumstances for the protection the worker and any other persons at the work site likely to be affected. Homestead encourages workers to report such violence so that **Homestead** can take reasonable preventive steps.

#### **H. Emergency response in the event of work site violence**

Workers should remove themselves, as quickly as possible, from any situation where violence has occurred or is imminently likely to occur. The worker should summon immediate assistance by contacting their immediate supervisor.

In cases of imminent physical violence, or where the circumstances warrant police involvement, the worker should contact the police by telephoning 911.

Victims who are injured because of workplace violence should seek immediate medical assistance and must notify their supervisor and the Human Resources department as soon as possible.

#### **I. Reporting and investigating work site violence**

1. Reporting work site violence:

- All incidents of work site violence or discriminatory action (defined below) must be immediately reported to management or the Human Resources department.
- All complaints and incidents are to be recorded in writing by the reporting person/employee, the manager receiving the report and the Human Resources department. The incident report should include:
  - the name(s) of the perpetrator(s) (if known);
  - 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 police have not previously been summoned, management or the Human Resources department will report all physical assaults to police. All other incidents or threats of work site violence will be reported to the police as appropriate;
- If an incident of work site violence involves a person who is not an employee of **Homestead**, management or the Human Resources department will report the incident to that person's employer, the police, if appropriate, and/or such other person as is determined appropriate in the circumstances.

## 2. Investigation:

- All complaints or incidents of work site violence or discriminatory action will be promptly investigated by an investigator and corrective action will be taken to address the incident(s). An 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 violence or the name of the complainant, the person alleged to have committed the violence, 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 be conducted as soon as is practicable in the circumstances.
- The investigation will include:
  - A documented interview with the complainant and/or victim;
  - 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 fully and fairly investigate the complaint or incident.
- At the conclusion of the 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 violence and the alleged perpetrator of the violence will be informed in writing of the investigation results and the corrective action to be taken to address the incident, if any.
- After reviewing the investigator's report, management and/or the Human Resources department may evaluate existing policies and procedures, examine the work site and company grounds, and assess the effectiveness of employee training in order to implement any further measures to eliminate or control the hazard of violence that has been identified as a result of the investigation.
- Where the investigator finds that the alleged perpetrator of the violence in fact perpetrated the violence and the perpetrator is also an employee of **Homestead**, the Human Resources department may take

disciplinary action up to and including termination of employment for just cause. The severity of any disciplinary action will be proportional to the seriousness of the conduct at issue such that more significant discipline will follow more serious conduct or repeated violations of this policy.

3. Notification of a specific or general threat:

- Once Homestead has knowledge of an incident of violence, Homestead may disclose the circumstances related to an incident of violence, and any other pertinent information (*e.g.* the identity of the perpetrator), where necessary to inform workers of a specific or general threat of violence or potential violence.
- Homestead will disclose only the minimum amount of personal information that is necessary to inform workers of a specific or general threat of violence or potential violence.

**J. No discriminatory action**

Work site violence and this policy are serious matters. This policy prohibits discriminatory action against employees who have made good faith complaints, participated in an investigation, or otherwise provided information regarding a complaint or incident of work site violence. 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 a worker's rights pursuant to any other law.

**K. Policy review**

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

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

**L. Document Retention**

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



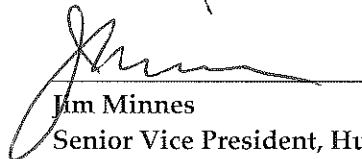
A. B. Smith  
Executive Chairman



David Trousdale & Martin Woock  
Chief Operating Officer(s)



Francine Moore  
President



Jim Minnes  
Senior Vice President, Human Resources

July 26, 2023

Date