



HARASSMENT PREVENTION POLICY

A. Policy statement

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

B. Purpose of harassment policy

This policy is intended to:

1. Create and foster a work environment free from workplace harassment;
2. Provide a definition of workplace harassment;
3. Establish and detail the responsibilities of all workers in the company to maintain a workplace free of harassment;
4. Ensure that incidents of workplace harassment are reported to management/Human Resources and/or law enforcement, as appropriate;
5. Ensure that complaints of workplace 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** workplaces including, but not limited to, all visitors, tenants, contractors, vendors, and delivery persons. The policy addresses workplace harassment from all sources such as customers, clients, employers, supervisors, workers, and members of the public. A “workplace” means any land, premises, location, or thing at, upon, in or near which a worker works. For the purposes of this policy, **Homestead** workplace includes all places where **Homestead** business occurs and includes all:

- **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, “workplace harassment” means,

- a) engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or
- b) workplace sexual harassment;

“workplace sexual harassment” means,

- a) engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- 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;

Examples of workplace harassment includes. but are not limited to:

- Making comments that are offensive, embarrassing, humiliating, or demeaning;
- 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 typically arises from a series of incidents or a pattern of behaviour. However, a single serious incident may constitute harassment.



A reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

Harassment may relate to a form of discrimination prohibited by the Ontario Human Rights Code. 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 Code*.

This is the companion policy to **Homestead's Workplace 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 every precaution reasonable in the circumstances for the protection of a work from workplace harassment;
- To consult with the committee or a health and safety representative, as applicable to develop and maintain a written program to implement this policy;
- To ensure that all workers are trained in this policy;
- To post this policy in a conspicuous place in the workplace;
- To ensure that this policy is communicated to contractors and other persons who attend company workplaces;
- To conduct investigations into incidents of complaints of workplace harassment that are appropriate in the circumstances;
- To investigate and deal with all complaints or incidents of workplace harassment in a fair and timely manner;
- To ensure the process for reporting and responding to incidents of workplace harassment is communicated, maintained and followed.

2. **Managers/supervisors**

- To understand and abide by the requirements of this policy;

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- To communicate and review this policy with the workers they supervise or manage;
- To verify that all contractors and others who attend company workplaces are aware of this policy;
- To encourage employees (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 workplace harassment;
- To respond to all complaints or incidents of workplace harassment in a professional manner appropriate for the circumstances of the complaint or incident;
- To communicate to Human Resources all incidents of workplace harassment and all incidents of harassment.

3. Workers (including managers)

- To comply with this policy at all times by treating all others in the workplace with respect and dignity;
- 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 workplace harassment to his/her manager, where approaching the person engaged in the offending conduct proves ineffective or is impractical/unreasonable;
- To participate in training regarding this policy and procedures directed at workplace harassment in the workplace; and
- To fully cooperate in any investigation of complaints or incidents of workplace harassment or breaches of this policy.

F. Complaint and investigation procedure

- Where the employee has attempted to discuss his/her concerns about harassment with the person who engaged in the offending conduct and such discussion proves ineffective to resolve the employee's concerns OR where, in the



circumstances, it is impractical/unreasonable for the employee to do so, the employee 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 employee's supervisor or manager, the employee should report the incident directly to a Human Resource representative. If the employee does not feel comfortable reporting the incident to their manager or Human Resources, the employee should report the incident to Jim Minnes, Senior Vice President – Human Resources.
- 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 will conduct an investigation into an incident / complaint that is appropriate in the circumstances. Homestead will endeavor to complete the investigation in a timely manner.
- At all times, the investigator will strive to maintain the confidentiality of the investigation. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law.
- All persons who participate in an investigation must keep the information completely confidential. Complainants, victims, alleged perpetrators, and witnesses (if any) are all required to maintain the confidentiality of the investigation. All investigation participants are prohibited from sharing



information amongst one another. The failure to maintain confidentiality is a serious breach of this policy which may result in discipline up to and including dismissal from employment for just cause.

- 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 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.
- 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. Additional resources for a worker to seek help to address workplace harassment is available. An employee make see guidance from the following: Health and Safety Administrators, Joint Health and Safety Committee Members, Health and Safety Representatives, or Homestead's employee assistance program;

H. No reprisal

This policy prohibits reprisals against employees who have reported complaints or incidents in good faith, participated in an investigation or provided information regarding a complaint or incident of workplace harassment. A worker is not to be penalized for reporting an incident or participating in a workplace harassment investigation. Employees who engage in reprisals or threats of reprisals may be disciplined up to and including dismissal from employment for just cause.

Reprisal includes:

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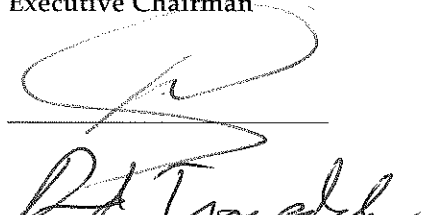
- Any act of retaliation that occurs because a person has complained of or provided information about an incident of workplace harassment;
- Intentionally pressuring a person to ignore or not report an incident of workplace harassment; and
- Intentionally pressuring a person to lie or provide less than full cooperation with an investigation of a complaint or incident of workplace harassment.


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 a reprisal or breach of this policy.

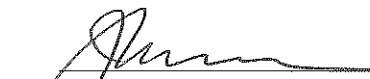
I. Policy review:

This policy will be reviewed as often as is necessary, but at least once annually.


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