

HOMESTEAD

WORKPLACE VIOLENCE PREVENTION POLICY

A. Policy statement

Homestead Land Holdings Limited (“Homestead” or the “company”) is committed to providing a safe and healthy workplace free from actual, attempted, or threatened physical or psychological violence. **Homestead** recognizes that workplace violence is a health and safety and human resources issue and will take every precaution reasonable in the circumstances for the protection of a worker (all employees including managers, contractors, and other individuals who perform work at Homestead’s workplaces) from, and the prevention of, workplace violence.

B. Purpose of workplace violence policy

This policy is intended to:

1. Create and foster a work environment free from workplace violence;
2. Provide a definition of workplace violence;
3. Establish and detail the responsibilities of all persons in the company to maintain a workplace free of actual, attempted or threatened violence;
4. Ensure that incidents of workplace violence are reported to management/Human Resources and/or law enforcement, as appropriate;
5. Ensure that complaints of workplace 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** workplaces including, but not limited to, all visitors, tenants, contractors, vendors, and delivery persons.

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 (whether owned or leased) and surrounding perimeter including parking lots, sidewalks, and driveways (“company grounds”);
- **Homestead** vehicles;

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- 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 violence defined

In this policy, “workplace violence” means: (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; (c) a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Examples of workplace 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 harm or a threat to safety or security in the workplace. Threats can be made verbally or in writing (*e.g.* notes, emails).
3. Bringing a weapon of any kind to the workplace or possessing a weapon of any kind while carrying out business or threatening to bring a weapon to the workplace.
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 Workplace Harassment Policy** which addresses conduct that is not covered by this policy.

F. Zero tolerance

Homestead values the health and safety of its employees and expects that its workplace(s) will be free of workplace violence. **Homestead** will not tolerate incidents of workplace violence perpetrated against or by any worker, customer, vendor, contractor, visitor, or any other person at a workplace or involved in company business or on company grounds.

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

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

- Remove the perpetrator from the workplace by security or the police;
- Discipline any employee, up to and including dismissal for just cause
- Report the conduct of any other person to their supervisor, manager, 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 protect employees and others in workplaces from, and the prevention of workplace violence;
- To ensure that a workplace violence assessment is conducted;
- To develop procedures to address the workplace violence risks identified in the violence assessment;
- To ensure that all employees 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 establish a process for reporting and responding to incidents of workplace violence;
- 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 violence is communicated, maintained, and followed;

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- To reassess the risks of workplace violence as often as is necessary to ensure that this policy continues to protect workers from workplace violence; and
- To ensure that this policy is reviewed at least annually.

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 verify that all contractors and others who attend company workplaces are aware of this policy;
- To encourage employees to report complaints or incidents of workplace violence;
- To respond to all complaints or incidents of workplace violence in a professional manner appropriate for the circumstances of the complaint or incident;
- To promptly report all complaints or incidents of workplace violence they receive or witness to the appropriate manager or to Human Resources.

3. Workers (including managers)

- To comply with this policy at all times to protect themselves and others in the workplace from workplace violence;
- To immediately notify their manager or other designated person of any incident of workplace violence, whether the notifying worker is the victim.
- In the case of an imminent threat of physical harm to themselves or any person from workplace violence, the worker should immediately seek safety and, only when it is safe to do so, the workers should contact the police and then Human Resources.
- To participate in training regarding this policy and procedures directed at workplace violence risks in the workplace; and
- To fully cooperate in any investigation of complaints or incidents of workplace violence or breaches of this policy.

G. Domestic violence

If Homestead becomes aware that domestic violence that would likely expose a worker to physical injury may occur in the workplace, Homestead shall take every precaution reasonable in the circumstances for the protection of the worker.

H. Emergency Response in the event of work site violence

Workers should remove themselves, as quickly as possible, from any situations 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 workplace violence

1. Reporting workplace violence:

- All incidents of workplace violence or reprisal must be immediately reported to management or the Human Resources department.
- All complaints and incidents are to be recorded in writing by the reporting worker, 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) (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 of threats of workplace violence will be reported to police as appropriate.

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- If an incident of workplace 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 workplace violence or reprisal will be promptly investigated by an investigator. The investigator may be an employee within the company or a third party;
 - The investigator will conduct the investigation in a fair and timely manner. The investigation will be conducted as soon as is practical in the circumstances.
 - The investigation will include:
 - a) A documented interview with the complainant and/or victim;
 - b) A documented interview with the alleged perpetrator(s);
 - c) A documented interview with any witnesses
 - d) A review of any relevant documents (*e.g.* emails, text messages, security camera footage); and
 - e) 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 of the findings of fact and the investigator's conclusions.
 - The work 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 that must be taken or will be taken because of the investigation, if any.
 - Where the investigator finds that the alleged perpetrator is in fact the perpetrator and the perpetrator is also an employee of **Homestead**, the Human Resources department may take any necessary 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

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significant discipline will follow more serious conduct or repeated violations of this policy.

3. Confidentiality:

At all times, the investigator will strive to maintain confidentiality. However, information obtained about an incident or complaint of workplace violence, 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. As such, complete confidentiality is not possible in all circumstances and cannot be guaranteed.

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.

J No reprisal

Workplace violence and this policy are serious matters. This policy prohibits reprisals against employees who have reported complaints or incidents in good faith, participated in an investigation or otherwise provided a complaint or incident of workplace violence. Employees who engage in reprisals or threats of reprisals may be disciplined up to and including dismissal from employment for just cause.

Reprisal includes:

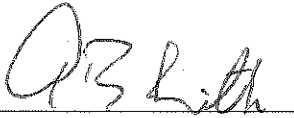
- Any act of retaliation that occurs because a person has complained of or provided information about an incident of workplace violence;
- Intentionally pressuring a person to ignore or not report an incident of workplace violence; and
- Intentionally pressuring a person to lie or provide less than full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

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.

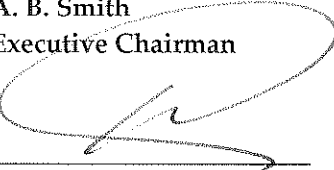
K. Policy review

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

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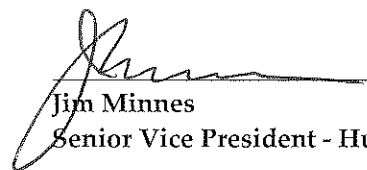
A. B. Smith
Executive Chairman



David Trousdale & Martin Woock
Chief Operating Officer(s)



Francine Moore
President



Jim Minnes
Senior Vice President - Human Resources

July 26, 2023

Date