

POLICY MANUAL



SECTION: Human Resources
SUBJECT: Workplace Harassment & Discrimination
APPROVED BY: Director, Human Resources

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Effective Date: June 2016
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Harassment and Discrimination Policy

Horizon Plastics aims to promote teamwork and excellence. To do this, the working environment must be free from discrimination, harassment and other intimidating personal behaviours. All of the company's work locations and offices maintain a professional and harassment free working environment. In all our workplaces employees are required to act with respect towards one another and towards those with whom they do business.

Employees have the right to work in a positive, professional, respectful and harassment free workplace environment. Horizon Plastics is committed to providing a work environment which respects individual rights, personal dignity and integrity, promotes equal opportunity and mutual respect and prohibits all forms of discriminatory practices.

This policy applies to all employees and applicants for employment and all aspects of the employment relationship, including recruitment, hiring, promotion, transfer, training, compensation, employee activities and termination. It also applies to how employees treat customers, vendors, suppliers and all other people related to our business.

The policy is not intended to constrain normal healthy social interaction between employees or to affect the ordinary and proper evaluation of the performance of a person's duties. It is intended to foster a working environment in which employees treat each other with mutual respect.

GENERAL GUIDELINES

Employees have the right to work in a positive, professional, respectful and harassment free workplace environment. Horizon Plastics is committed to providing a work environment which respects individual rights, personal dignity and integrity, promotes equal opportunity and mutual respect and prohibits all forms of discriminatory practices.

Horizon Plastics is committed to maintaining a collegial work environment in which all individuals are treated with respect and dignity and which is free of harassment. In keeping with this commitment, Horizon Plastics will not tolerate harassment, including sexual harassment, as defined in this Policy, of employees by anyone, including any supervisor, co-worker, vendor, client or customer, whether in the workplace, at assignments outside the workplace, at Horizon Plastics sponsored social functions, or elsewhere.

The following definitions are important in relation to this policy:

Workplace Sites, locations and offices of Horizon Plastics as well as any other place employees are required to be in their role as employees of the company (e.g. visiting customers, work related conferences or training sessions, work

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related social functions, in the course of work assignments outside the office, during work, related travel, over the phone, by e-mail, etc.)

Discrimination For the purposes of this policy, Discrimination is behaviour or a pattern of practice by an individual or group that has the effect of disadvantaging an individual or members of a group of individuals because the individual or the group has certain specific characteristics that are fundamentally unrelated to job performance. Unfair or illegal discrimination exists whether the actions are intentional or not.

The Human Rights legislation, though not limited to the following, prohibits discrimination on the grounds of place of origin, creed, and harassment on all prohibited grounds of discrimination, sexual orientation, family status, ancestry, physical disability, mental disability, criminal conviction, marital status, childbirth/pregnancy, sex, age, citizenship/nationality, colour, ethnic/national origin, race, religion, source of income, political beliefs association or activity, physical size or weight.

Harassment Harassment is any pattern of conduct - verbal, written, physical or by innuendo - that might reasonably be expected to cause offence or humiliation to another person and encompasses workplace and sexual harassment (as per the examples outlined below).

Workplace Harassment Engaging in a course of vexatious comment or conduct against a worker in the workplace that is known or ought reasonably to be known to be unwelcome.

Abusive, illegitimate or inappropriate conduct or comment that a reasonable person would find demeaning or causing offence.

Verbal or physical Workplace harassment includes but is not limited to behaviour that:

- might reasonably be expected to cause embarrassment, offence or humiliation (see examples below for clarification);
- Interferes with work performance or creates a hostile work environment.

Examples of behaviour which constitute workplace harassment include:

- violent or threatening physical or verbal outbursts or abuse;
- sarcastic or derogatory comments or actions which demean, belittle or humiliate an individual or group or their ability or intelligence;
- yelling, screaming, swearing or similar behaviour aimed at intimidating, frightening, coercing or offending those at whom it is directed;

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- racial slurs.

Psychological harassment is any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that result in a harmful work environment for the employee. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment.

Sexual Harassment

Any unwelcome behaviour which is sexual in nature (unwanted sexual advances, unwanted requests for sexual favours and other unwanted verbal or physical conduct of a sexual nature). Sexual harassment includes but is not limited to behaviour that:

- might reasonably be expected to cause embarrassment, insecurity, discomfort, offence, humiliation (see examples below for clarification);
- is implicitly or explicitly a condition of employment or advancement;
- is used as a basis for any employment decision;
- interferes with work performance or creates a hostile work environment.

The behaviour may be by men towards women, by women towards men, between men or between women. Examples of types of behaviour which constitutes sexual harassment include:

- sexist comments or jokes causing embarrassment or offence, told or carried out after the joker has been advised that they are embarrassing or offensive, or that are by their nature clearly embarrassing or offensive;
- leering;
- displaying of offensive material of a sexual nature;
- sexually degrading words used to describe a person;
- drawing attention to a person's sex and having the effect of undermining the person's role in a professional and business environment;
- derogatory or degrading remarks directed towards members of one sex or one sexual orientation;
- sexually suggestive or obscene comments or gestures;
- unwelcome sexual flirtations, advances or propositions;
- unwelcome inquiries or comments about a person's sex life;
- persistent unwanted contact or attention after the end of a consensual relationship;
- requests for sexual favours;
- unwanted touching;
- verbal abuse or threats;

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- any other inappropriate conduct based on one of the prohibited grounds of discrimination;
- sexual assault.

RESPONSIBILITIES OF ALL HORIZON PLASTICS EMPLOYEES

All employees of Horizon Plastics are responsible for doing their part in ensuring a respectful work environment for their fellow employees that is free from discrimination, sexual harassment and workplace harassment. All employees are responsible for behaving in a manner which is respectful to all people.

If any employee believes an incident of any form of harassment has occurred he or she should make his or her disapproval and/or discomfort known to the offending party immediately. This includes harassment by fellow employees and non-employees at the workplace.

An employee who believes he or she has been harassed should promptly contact his or her immediate supervisor in confidence to request informal advice or to file a complaint. Should this be unworkable, because the supervisor is implicated in the harassment, the employee should contact Human Resources. Complaints should be documented and filed in writing.

Employees should keep a written record of the situation including such information as: details of the objectionable behaviour, persons involved, dates, places, witnesses (if any), what happened, the offending party's response. Where an employee believes a fellow employee has experienced or is experiencing harassment, this should be reported to the employee's supervisor or, if appropriate, to Human Resources.

Employees have the right to file a complaint with the respective provincial Human Rights Commission or applicable Ministry of Labour.

RESPONSIBILITIES OF THE EMPLOYER

It is the responsibility of Horizon Plastics to:

- Be a role model for respectful behaviour;
- Discourage harassment and ensure all employees are provided with the information contained in this policy;
- Work to ensure that the workplace is free from harassment by addressing any behaviour that reasonably could be deemed to be harassment (by Horizon Plastics employees and non-employees at the workplace).
- Immediately investigating any complaints;
- Inform employees of company policy and procedures in dealing with harassment;
- Treat each complaint in a serious and confidential fashion;

Confidential and Proprietary Information of Horizon Plastics International

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- Maintain appropriate confidential records of each reported incident;
- Provide advice and support to persons subjected to harassment by a person who is not an employee of the Company;
- Impose the appropriate disciplinary measures when a complaint of harassment is found to have been substantiated;
- Appoint advisors and provide the training and necessary resources for them to fulfill this responsibility;
- Commit to periodic review of the policy and adjust as needed/required.

Due to their recognized positions of authority, Horizon Plastics supervisors/managers/officers are responsible for ensuring their behaviour meets the highest standards of compliance with the letter and spirit of this policy.

Failure on the part of any responsible individual to take prompt and appropriate action in response to a written harassment complaint is a serious offence. It is the responsibility of any person within any operation of Horizon Plastics supervising one or more employees to take appropriate action to report or deal with incidents of harassment whether brought to their attention or personally observed. Under no circumstances should a legitimate complaint be dismissed or downplayed, nor should the complainant be told to deal with it personally.

Reporting

If any employee believes that he/she is being harassed, the employee should clearly and promptly notify the offender that the behavior is unwelcome. If for any reason an employee does not wish to confront the offender directly or if such confrontation does not successfully end the harassment, the employee should immediately notify Human Resources. The employee also has the option of reporting the harassment to his/her supervisor or manager. In such a case, the supervisor or manager must immediately report the complaint to Human Resources.

Although Horizon Plastics has chosen not to impose a limited time frame for reporting harassment complaints, prompt reporting is strongly encouraged. It allows for rapid response and resolution of objectionable behavior or conditions, both for the complaining employee and any other affected employees.

No Retaliation

Horizon Plastics will not retaliate against any employee who makes a good faith report of harassment, nor will Horizon Plastics permit any employee to do so. Any form of retaliation against anyone who has reported harassment is strictly forbidden.

The Investigation

Horizon Plastic's policy is to take all complaints of harassment seriously, and all such complaints will be promptly and thoroughly investigated.

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Confidentiality

To the fullest extent practical and appropriate under the circumstances, Horizon Plastics will treat complaints and the terms of their resolution as personal and confidential.

Corrective Action

If an investigation confirms that harassment has occurred, Horizon Plastics will take corrective action, including discipline up to and including immediate termination of employment of the offending employee.

Review

If either party directly involved in a harassment investigation is dissatisfied with the outcome or the resolution, that individual should submit a written request to the Director of Human Resources to have the decision reconsidered.

Horizon Plastics recognizes that this policy may not address every set of circumstances which may arise in the workplace related to harassment. It does, however, provide reasonable guidelines which will probably cover most situations. If unanticipated situations arise, contact Human Resources immediately.