



Policy Workplace Harassment, Violence and Discrimination

SUBJECT: Workplace Harassment, Violence and Discrimination Policy
DISTRIBUTION: All team members in Canada, Laurentian Bank Financial Group
APPROVED BY: Human Resources and Corporate Governance Committee
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Contact Information to Report a Complaint:

- Executive Vice President & Chief Human Resources Officer – Sébastien Bélair
 - Contact information is available to employees on the Group's intranet
- Ombudsman – Laurentian Bank of Canada
 - Contact information is available to employees on the Group's intranet
- Whistleblower Complaint – Clearview Connects – For Anonymous Complaints
 - Contact information is available to employees on the Group's intranet

1. POLICY STATEMENT

Laurentian Bank of Canada, together with its subsidiaries “**Laurentian Bank Financial Group**” or the “**Group**”, is committed to providing a respectful, healthy and safe work environment free from all forms of harassment, violence and discrimination, in accordance with the *Canada Labour Code*, the *Canada Occupational Health and Safety Regulations*, the *Canadian Human Rights Act* and applicable provincial human rights and workplace health and safety legislation.

The Group prohibits and will not tolerate harassment, violence or discrimination from any person in the workplace, including team members, service providers, consultants, suppliers, business partners, clients and members of the public, as applicable. All individuals are required to conduct themselves in a professional manner on Group premises or while engaging in work-related activities and to refrain from engaging in harassing, violent or discriminatory behaviour.

All team members have a role in preventing workplace harassment, violence and discrimination and are responsible for working in compliance with this Workplace Harassment, Violence and Discrimination Policy (the “**Policy**”). Team members are encouraged to report occurrences of workplace harassment, violence and discrimination. The Group is committed to reviewing and addressing all such reports, complaints and occurrences, as appropriate, in a fair, timely and respectful manner whether that be through negotiated resolution, mediation, and/or investigation.

2. OBJECTIVES

The Policy is intended to:

- State the Group's commitment to preventing and addressing harassment, violence and discrimination in the workplace;
- Foster individual and collective responsibility for creating a respectful workplace free from harassment, violence and discrimination;
- Encourage individuals to report any incidents of harassment, violence or discrimination;
- Establish the Group's complaint resolution mechanisms relating to workplace harassment, violence and discrimination;
- Assert the Group's commitment to taking appropriate administrative or corrective action against team members who commit or contribute to harassment, violence or discrimination; and
- Remind team members that any occurrence of workplace harassment, violence or discrimination may also be reported anonymously according to the procedures set out in the Group's Whistleblower Policy.

3. APPLICATION

This Policy applies to all team members of the Group in Canada and addresses workplace harassment, violence and discrimination from all sources including other team members, service providers, consultants, suppliers, business partners, clients and any individuals with whom team members may come into contact as part of their work, including the public. It covers any activity that is reasonably linked to work, regardless of where such activity takes place, including on transportation used for work and during social events organized by the Group.

Compliance with this Policy is a condition of employment for all team members and part of the Group's Code of Ethics.

4. DEFINITIONS

"Harassment" is a form of vexatious (meaning upsetting or distressing) comment or conduct against a team member that is hurtful, abusive and/or known or ought reasonably to be known to be unwelcome, or creates a hostile, unhealthy or intimidating work environment. It manifests itself in any undesirable act or speech that offends or humiliates others and undermines their dignity or integrity. Harassment can include, but is not limited to, jokes, comments, threats or other offensive and inappropriate behaviour.

"Sexual harassment" is a particular form of harassment involving comment, conduct, gesture or contact of a sexual nature. It involves any vexatious comment, conduct, gesture or contact of a sexual nature against a team member in a workplace because of sex, sexual orientation, gender identity or gender expression, where it is known or ought reasonably to be known to be unwelcome or likely to cause offence or humiliation to the team member. It could also involve making a sexual solicitation or advance where the person making it is in a position to confer, grant or deny a benefit or advancement to the team member and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. It can be verbal, non-verbal or physical. It is defined as any behavior, remark, act or contact that, in a sexual way:

- is offensive, harmful or humiliating to a team member;
- may reasonably be perceived by a team member as placing a condition of a sexual nature on employment or on any opportunity for training or promotion, or;
- makes the workplace intimidating, hostile or offensive.

Among other things, sexual harassment can occur in one or more occurrences, including:

- Persistent or abusive displays of unwelcome sexual interest;
- Inappropriate advances or invitations (direct or indirect), promises, threats, intimidation or any comments that may be interpreted as a request for sexual favours;
- Persistent remarks, jokes, innuendo or taunting about a person's physical appearance or gender;
- Physical contact such as stroking, pinching, or brushing against someone in a deliberate manner that is not desired by the other person;
- The display of pornographic photographs or other sexually derogatory images; or
- Physical aggression with a sexual connotation or imposition of unwelcome sexual intimacy.

It is understood that the above list of examples is non-exhaustive.

"Psychological harassment" is any vexatious comment or conduct manifested as hostile or unwelcome behaviours, words, actions or gestures over a given period of time that infringe on the dignity or psychological integrity of the team member and that result in a harmful workplace. It can take many forms, including:

- Humiliating comments, offensive statements, derogatory remarks, threats;
- Repeated insinuations, repeated attempts at exclusion or isolation; or
- Denigration of the victim to their colleagues or constant discrediting of their work.

“Violence” is any action, conduct, threat or gesture of a person toward a team member at their place of work that could reasonably be expected or interpreted to cause them harm, injury or illness. Violence can be physical, non-verbal, verbal or psychological.

“Discrimination” is an action, an omission or a decision that treats a person or a group adversely for a reason linked to prohibited grounds, such as their race, age, disability, national or ethnic origin, colour, religion, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been granted. It can be direct or indirect. Harassment, sexual harassment, psychological harassment and violence, based on prohibited grounds, are also forms of discrimination. It is understood that the prohibited grounds mentioned above are those of the *Canadian Human Rights Act*, but all other grounds prohibited by applicable provincial human rights legislation are also included in this list and apply in the applicable provincial jurisdictions where the Group operates, such as, but not limited to, place of origin, pregnancy, civil status, political convictions, language, social condition, ancestry, citizenship, creed and record of offences.

5. COMMITMENT

The Group commits to:

- Make all reasonable efforts necessary to ensure a workplace free of harassment, violence and discrimination;
- Make all reasonable efforts necessary to prevent and respond to occurrences of harassment, violence and discrimination;
- Resolve situations of harassment, violence and discrimination, to the extent reasonably possible, and if resolution is not reasonably possible, mandate a competent person to investigate and make findings and recommendations for corrective action (including recommendations to eliminate or minimize the risk of a similar occurrence); and
- Provide team members who are victims of harassment, violence or discrimination with support, including through the Employee and Family Assistance Program (E.F.A.P.).

6. RISK FACTORS

A number of activities or circumstances may increase the risk of workplace harassment or violence. These include (please note this list is not exhaustive):

- Handling cash or administering clients' money;
- Protecting or securing valuables;
- Transporting people and goods;
- Travel and a mobile workplace (such as a vehicle);
- Public or community contact (especially with unstable or volatile people);
- Working alone or with just a few people;
- Working late nights or very early mornings;
- Working in high pressure environments;
- Delivering disappointing news;
- Attending events where an excessive amount of alcohol is being consumed;
- Working with someone or being directly subjected to family or domestic violence; and
- Working in an environment where unwelcome teasing, bullying, harassment or discrimination occurs, is known by team leaders and is not addressed.

7. MEASURES TO CONTROL RISKS

Measures that are in place to control risks of workplace harassment or violence include (please note this list is not exhaustive):

- Financial Clinics no longer have access to cash and this has been communicated to the public;
- Public access is restricted and security pass cards and/or keys are required in the Group's offices;
- Client calls can be monitored and any threatening calls may be reviewed and reported to the appropriate authorities as necessary;
- Building security is available on-site in certain of the Group's offices and may be summoned quickly in the event of workplace violence;
- Team leaders and Human Resources Business Partners are available to provide team members and team leaders, respectively, with guidance, support, and resources on how to professionally and sensitively deliver disappointing news to a variety of audiences;
- The Group has implemented a Guideline on Workplace Drug and Alcohol Consumption and ensures measures are in place to moderate the level of alcohol consumption at special work-related events;
- The name and photograph of anyone who poses a safety risk to a team member may be used to prevent the person from gaining access to the premises;
- Team members are required to confirm their commitment to adhere to the Code of Ethics and this Policy as a condition of their employment at the time of hire and then annually thereafter;
- Workplace risk assessments and reports of workplace harassment, violence and discrimination will be conducted and reviewed, respectively, by Human Resources in consultation with workplace health and safety partners to ensure preventative measures are considered and put in place as necessary; and
- All unwelcome teasing, bullying, harassment, violence and discrimination is to be addressed promptly and directly by team leaders and, if necessary, resolved, conciliated or investigated in accordance with the Code of Ethics and this Policy.

8. PROHIBITED CONDUCT

No team member shall harass, harm or discriminate against another person in the workplace or adopt any of the behaviours that are known to contribute to harassment, violence or discrimination.

Prohibited conduct includes, but is not limited to:

- Actions directed toward another person with the intention of harming their physical or psychological integrity;
- Threatening gestures toward another person, including writings or words;
- Displays of brutality or intimidation;
- Displays of extreme anger or aggression;
- Actions toward the property of the Group or another person with intent to cause damage; and
- Adverse treatment toward another person that is unfavorable and based on prohibited grounds.

Any form of harassment, violence or discrimination is likely to result in the imposition of administrative and/or corrective measures by the Group, and depending on the severity of the conduct, this may include termination of employment for cause.

9. RESPONSIBILITIES

Team leaders: All team leaders are required to take appropriate measures when they experience, witness or otherwise become aware of any occurrence of harassment, violence or discrimination, regardless of where it occurs. When team leaders are unable to intervene in such a situation, they must immediately notify their team leader and/or the next level of management (as appropriate) as well as their Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer.

Team members: All team members must behave in a manner that is free of any form of harassment, violence or discrimination against their colleagues, their superiors, Group clients, consultants, suppliers, business partners and the general public. They must also contribute to maintaining a workplace free of all forms of harassment, violence or discrimination. All team members are encouraged to take appropriate measures when they experience, witness or become aware of any occurrence of harassment, violence or discrimination to ensure the application and respect of this Policy. When a team member believes they are a victim of any occurrence of harassment, violence or discrimination, the complainant is encouraged to follow the complaint process outlined in Section 10. When team members witness or become aware of any occurrence of harassment, violence or discrimination, they are encouraged to first notify their team leader, the next level of management, their Human Resources Business Partner, the Executive Vice President & Chief Human Resources Officer, the Ombudsman or the Third-Party Service Provider as soon as possible. For more information on how team members may notify the Executive Vice President & Chief Human Resources Officer, the Ombudsman, and/or the Third-Party Service Provider, please see the Appendix. Team members must act in good faith when using the complaint process outlined in Section 10 of this Policy.

Human Resources Business Partners and Executive Vice President & Chief Human Resources Officer: Human Resources Business Partners and the Executive Vice President & Chief Human Resources Officer take reasonable steps to ensure that team members are provided with a workplace free of all forms of harassment, violence and discrimination. Human Resources Business Partners and the Executive Vice President & Chief Human Resources Officer are responsible for ensuring the diligent processing of complaints according to the resolution mechanism set out in Section 10 of this Policy. All complaints will be handled with diligence and confidentiality, to the extent possible, and without prejudice to the complainant, subject to paragraph 10.6 of this Policy. Human Resources Business Partners and the Executive Vice President & Chief Human Resources Officer will take any provisional or corrective actions provided for in clauses 10.4 and 10.5 of this Policy, respectively, which must be appropriate in the circumstances, to ensure compliance with this Policy.

Workplace Health and Safety Partners: Workplace health and safety partners (i.e., workplace health and safety policy committee, workplace health and safety committees, and/or health and safety representatives, as applicable) will be involved in workplace risk assessments as well as reviews and updates of the Policy.

10. COMPLAINT RESOLUTION MECHANISM

- 10.1** Team members who believe that they are being harassed, abused or discriminated against are encouraged, if able, to notify the person concerned that they disapprove of their conduct, while asking that person to stop it immediately.
- a) If the occurrence of harassment, violence or discrimination continues despite the complainant expressing disapproval or, if the complainant is unable to confront the person concerned, the complainant is encouraged to immediately inform their team leader of the issue. If a team member believes they cannot get help from their team leader, they are encouraged to contact the next level of management, their Human Resources Business Partner or the Executive Vice President & Chief Human Resources Officer directly. In every case, the team leader who receives the complaint must inform their Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer immediately. If uncomfortable with contacting these individuals, a complainant may contact the Ombudsman or anonymously contact the Third-Party Service Provider. While complaints may be made verbally or in writing, complainants will be encouraged to complete a detailed written complaint including the name of the complainant and the responding party, if known; the date of the occurrence; and a detailed description of the occurrence.

- b) If the occurrence of harassment, violence or discrimination involves a Vice-President or a higher position in the Group's hierarchy, the complainant may report this issue to their Human Resources Business Partner, the Executive Vice President & Chief Human Resources Officer, the Ombudsman or the Third-Party Service Provider if the team member believes that his or her team leader or the next level of management is unable to take charge of the complaint. The complainant will then be encouraged to complete a detailed written complaint as outlined above.
- 10.2** Once a complaint is received, the applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer, must review the complaint and make every reasonable effort to resolve the issue. If the issue remains unresolved, the parties may attempt to resolve the issue by mediation if they agree to mediation and on a person to facilitate it. If the issue is not resolved after mediation or a mediation is not conducted for whatever reason, the applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer will ensure that an investigation is conducted. To this end, the applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer are responsible for mandating a competent and objective person to conduct an investigation in order to make findings and recommendations regarding any corrective measures to be taken (including recommendations to eliminate or minimize the risk of a similar occurrence). This investigation mandate may be entrusted to an internal or external investigator. This investigation will be completed in a timely manner and the parties will be treated fairly and with respect for their rights.
- 10.3** The complainant will be asked to provide the investigator with detailed and specific information as to the nature of the harassment, violence or discrimination, including the names of witnesses, if any. Respecting the rights of all, the parties undertake to keep confidential, to the extent possible, the information obtained and exchanged within the framework of the complaint resolution mechanism. Information obtained about an occurrence or complaint of workplace harassment, violence or discrimination, 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 occurrence or complaint, or is otherwise required by law.
- 10.4** The applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer, in concert with the team leaders and team members involved, ensures that interim measures are taken, to the extent possible, to support the complainant and to stop the occurrence of harassment, violence or discrimination upon the filing of a complaint. Among these measures, the temporary and administrative suspension of one or more team members during the investigation may be considered, if this measure is considered necessary to stop the occurrence of harassment, violence or discrimination. Human Resources Business Partners and the Executive Vice President & Chief Human Resources Officer, in concert with team leaders involved, will also consider what other support measures could be made available to the complainant, including but not limited to assistance available through the Group's confidential and free Employee and Family Assistance Program available 24/7 (to access, team members are encouraged to call 1-844-880-9142).
- 10.5** Following an investigation, the investigator provides a report to the Executive Vice President & Chief Human Resources Officer containing the facts gathered for analysis and findings as to the facts collected, as well as recommendations for corrective measures to be taken, if any (including recommendations to eliminate or minimize the risk of a similar occurrence). Then, if the complaint is justified, the applicable Human Resources Business Partner and Executive Vice President & Chief Human Resources Officer determine the corrective measures to be imposed as well as the appropriate administrative measures, if any. In each case, the applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer will communicate the results of the investigation to the team member who filed the complaint, the team member alleged to have breached this Policy if that team member is an employee of the Group, and any applicable workplace health and safety partner as may be required by law.
- 10.6** Any team member who files a complaint that is deemed by the applicable Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer to be frivolous, abusive, or in bad faith in order to cause harm or discredit someone is subject to corrective action, up to and including termination of employment for cause.

- 10.7** When a complaint is filed with a Human Resources Business Partner and the Executive Vice President & Chief Human Resources Officer, the Ombudsman, or the Third-Party Service Provider, the Human Resources and Corporate Governance Committee of the Board is informed, except where a Committee member is the subject of a complaint or has a conflict of interest. If the Committee member is not aware that they are the subject of a complaint or have a conflict of interest and the case is brought to the attention of the Chair of the Committee, the Chair of the Committee will treat the case confidentially and exclude the member in question from any participation in the case. If the Committee member is aware that they are the subject of a complaint or have a conflict of interest, such Committee member shall recuse themselves from participation in the case.
- 10.8** A team member may seek assistance or file an application, complaint or claim in any applicable forum or with any provincial or federal regulatory authority (i.e., court, commission, tribunal, Board, legal support centre, Ministry of Labour) dealing with employment standards, occupational health and safety, or human rights and nothing in this Policy shall prevent or discourage them from seeking such recourse. A team member also retains the right to exercise any other legal recourse that may be available.

11. NO RETALIATION

Retaliation against a team member who has reported any form of harassment, violence or discrimination; made a complaint; attempted to use this Policy; or took part in any investigation within the scope of this Policy in good faith is strictly prohibited and any team member in breach of this rule will be subject to corrective action up to and including termination of employment for cause.

12. EMERGENCY RESPONSE & NOTIFICATION PROCEDURE

In the event of workplace violence, team members shall remain calm, protect themselves, exercise good judgment and do the following to summon assistance, depending upon the circumstances and the severity of the workplace violence, injury, continuing threat and/or concerns of team members who experienced the workplace violence:

- a) Notify your team leader or Human Resources Business Partner immediately who will determine whether the occurrence of workplace violence requires the immediate assistance of emergency services personnel or whether it is more appropriate that it be addressed through the Complaint Resolution Process outlined in the Policy.
- b) If the assistance of emergency services personnel is required immediately, contact 911 and advise of the situation.
- c) If applicable, contact your building security team and advise of the situation.
- d) If necessary and safe to do so, contact a nearby First Aid Attendant and request assistance.
- e) If not already done, contact your Human Resources Business Partner and advise of the situation.
- f) If possible and safe to do so, the team leader shall arrange for someone to meet building security, police, paramedics and/or other emergency services personnel in advance of their arrival at the workplace.
- g) Follow the directions of police, building security, paramedics, your team leader, Human Resources and if applicable, the First Aid Attendant.

13. ADDITIONAL INFORMATION

13.1 INTERPRETATION AND APPLICATION OF THE POLICY

If you have questions about the interpretation or application of this Policy, please contact your team leader, Human Resources Business Partner, or the Human Resources Expertise Centre (HREC). The HREC is also available to assist team members identify the name and contact information of the Human Resources Business Partner assigned to their sector.

13.2 REVIEW OF THE POLICY AND WORKPLACE ASSESSMENT

Human Resources in consultation with workplace health and safety partners will: (a) review the Policy at least once every year and, if necessary, update the Policy following any change to an element of the Policy; and (b) review and, if necessary, update the workplace assessment (identifying risk factors and developing and implementing preventative measures) at least every three years and following notification of a complaint if the party alleged to have breached the Policy is not an employee of the Group or a complainant ends the resolution process.

14. COMMUNICATION & TRAINING

This Policy will be available to team members on the intranet. Team members will receive training on the Policy at the beginning of employment and then at least once every three years thereafter.

15. CONTACT INFORMATION TO REPORT A COMPLAINT

Executive Vice President & Chief Human Resources Officer

Sébastien Bélair

- Contact information is available to employees on the Group's intranet

Ombudsman

Laurentian Bank

Ombudsman's Office

- Contact information is available to employees on the Group's intranet

Third-Party Service Provider - Clearview Connects

In addition to contacting your team leader, another member of senior management, your Human Resources Business Partner, the Executive Vice President & Chief Human Resources Officer, or the Ombudsman, the Group has established a process for anonymous complaints through an independent, Third-Party Service Provider, Clearview Strategic Partners.

Clearview provides multiple channels through which anyone can voice their concerns anonymously. Persons calling from Canada or the United States may use toll free phone numbers as well as make submissions through an online form.

While the Group takes all concerns seriously and investigates all credible complaints, everyone should be mindful that not providing sufficient details and information can limit the ability of the Group to thoroughly investigate a complaint.

- Contact information is available to employees on the Group's intranet