



SECTION: Health and Safety

POLICY: HS 06

DATE: December 2025

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June 2025; Formerly the Workplace Harassment and Violence Policy
December 2022; December 2017; October 2015; June 2013

WORKPLACE ANTI-HARASSMENT POLICY

PREAMBLE

Contact Brant is committed to ensuring a workplace free of harassment, bullying, and discrimination. In pursuit of this, Contact Brant will not tolerate any harassment, bullying, or discrimination within the workplace. Contact Brant is further committed to investigating any complaints regarding workplace harassment, bullying, and/or discrimination, using the method of corrective action, up to and including the point of termination of employment for the perpetrator(s).

Canada's Criminal Code specifically lays out matters such as violent acts, sexual assault, threats, and behaviours such as stalking. In the event of any of the above, Contact Brant will immediately contact the police. Contact Brant will abide by legislation including the Ontario Human Rights Code, and the Occupational Health and Safety Act.

Note that this Anti-Harassment Policy is administered in conjunction with Contact Brant's Human Rights Commitment Policy and includes freedom from discrimination under any of the grounds established by the Ontario Human Rights Code, including race, colour, national or ethnic origin, ancestry, religion, age, sex, sexual orientation, gender identity and expression, marital status, family status, disability, genetic characteristics, and/or conviction of an offence.

This anti-harassment policy is applicable to all employees at Contact Brant and covers occurrences of workplace harassment from all sources including clients, the employer, supervisors, employees, and members of the public.

Definitions:

Harassment is defined by the Ontario Occupational Health and Safety Act as "engaging in the course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome." This includes sexual harassment, personal harassment, psychological harassment, and bullying.

Workplace harassment does not include reasonable actions taken by an employer or supervisor relating to the management or direction of workers in the workplace.

Sexual harassment under the Ontario Occupational Health and Safety Act is defined as "engaging in a course of vexatious comment or conduct against a worker in a workplace setting, including virtually through the use of information and communications technology, 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 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.”

Harassment can either occur over a period or in a specific instance, depending on the specific situation. Common harassing behaviours can include, but are not limited to:

- Rumour spreading
- Jokes about sex
- Email chains with jokes about specific individuals
- Excluding individuals from work-related activities
- Reviewing work unfairly or trivial fault-finding
- Belittling behaviour or comments.

POLICY

In pursuit of a harassment-free environment, Contact Brant is committed to fully preventing and/or addressing any instances of harassment, including sexual harassment.

All employees are prohibited from sexually soliciting or making advances on another employee; this could include co-worker to co-worker or supervisor/manager to employee. Any reprisals for the rejection of these advances are not permitted.

Contact Brant will take all reasonable measures to not permit the creation of a poisoned work environment, as created by comments or any forms of conduct that are known to be unwelcome.

Contact Brant encourages employees who witness or who are victims of harassment, bullying, or discrimination to bring forward the information as soon as possible so that an investigation may immediately commence.

Any employee who experiences harassment while in the course of work for Contact Brant has the right to file a complaint without any fear of reprisal.

Contact Brant will ensure that an investigation is conducted into any incidents or complaints of workplace harassment, as appropriate.

PROCEDURES

1. In pursuit of a harassment-free environment, Contact Brant is committed to fully preventing and/or addressing any instances of harassment, including sexual harassment, by:
 - Providing education and training to ensure that all employees understand their rights and responsibilities regarding harassment.
 - Ensuring that supervisors understand how to respond to incidents of harassment, including how to collect information, how to act, how to deal with confidentiality, how to document, and how to keep records.
 - Methodically monitoring or adjusting Contact Brant’s systems for any barriers, including any barriers regarding any protected grounds laid out in the Ontario Human Rights Code and Contact Brant’s Human Rights Policy.
 - Reviewing their Anti-Harassment program with the Health and Safety Committee.

- Providing a procedure for complaints (outlined below) that is fair, timely, and effective.
 - Ensuring to promote appropriate standards of conduct.
2. Employee and Supervisor Responsibilities: All employees have the responsibility to adhere to the contents of this policy and refrain from enacting or condoning any form(s) of harassment.
 - 2.1. All employees have the responsibility of fully cooperating in any investigations into complaints of harassment.
 - 2.2. All managers have an additional responsibility of acting immediately upon either receiving a complaint of harassment or witnessing it themselves. Managers are responsible for the creation and maintenance of a harassment-free workplace and must immediately investigate as soon as any forms of harassment become known in the workplace.
 3. Complaint Process: All complaints regarding harassment, bullying, or discrimination may be brought forward to:
 - 3.1. The employee's Manager, another Manager, or the CEO.
 - 3.2. If the CEO is the alleged harasser, a report can be made to another Manager or directly to the Chair of the Board of Directors, or another member of the Board of Directors.
 - 3.3. Immediately upon receipt of a complaint, an investigation will be started, and additional information and context will be sought. The investigation may include:
 - A review of the details of the incident;
 - Separate interview(s) with the parties involved and any witnesses;
 - Examination of any relevant documents, emails, notes, photographs, or video;
 - A decision about whether the complaint constitutes workplace harassment,
 - The preparation of a report which summarizes the incident, the steps of the investigation, the evidence collected, and any findings.
 - 3.4. Contact Brant will take appropriate measures to ensure that employees and/or witnesses involved in filing the complaint are protected, as necessary. This may include temporary reassignments or shift changes. Contact Brant will ensure that these changes do not penalize any employee who brought forward a complaint or any witness to the complaint.
 - 3.5. Contact Brant will not disclose any information regarding a complaint of harassment (including any identifying personal information of any of the individuals involved), unless the disclosure may become necessary for the purposes of investigating the complaint, taking disciplinary action, or as required by law.
 - 3.6. The employee who disclosed the complaint, as well as the alleged harasser (provided they are both employees of Contact Brant), will be kept up to date on the investigation and will be notified of the results of the investigation and any

subsequent actions to be taken.

- 3.7. Any reports resulting from an investigation into complaints of harassment, discrimination, or bullying are not considered to be Occupational Health and Safety reports and will not be shared with the health and safety committee.
4. Confidentiality: Contact Brant will not disclose any information regarding a complaint of harassment (including any identifying personal information of any of the individuals involved), unless the disclosure is necessary for the purposes of investigating the complaint, taking disciplinary action, or as required by law.
 - 4.1. All parties involved in a workplace harassment complaint, including complainants, respondents, witnesses, managers, and support persons, are expected to treat the matter and any information they become aware of as confidential.
 - 4.2. No party shall discuss the matter or associated details with other employees or witnesses. An employee may face disciplinary action if it is determined that they have failed to adhere to these confidentiality expectations.
 - 4.3. All investigation notes and full reports will be retained in a separate file and are not to be saved in employee personnel files. Investigation outcome letters and disciplinary action will be saved in applicable employee files only when the complaint has been verified and is found to be in breach of this policy.
5. This policy will be posted in a conspicuous place beside the Health and Safety board. It will be reviewed as often as necessary, but at least annually.