

Respectful Workplace Policy

Overview TEPC is committed to a healthy, harassment-free work environment in which all individuals are treated with dignity and respect. The following company-wide policy is intended to prevent harassment of any type, including sexual harassment, and to deal quickly and effectively with any incident that might occur.

Coverage This policy covers every employee of TEPC, full-time, part-time, permanent and temporary, independent contractors or anyone engaged in any employment or consulting capacity to TEPC. It covers individuals while engaged in any activity related to their employment or contract with TEPC, whether on TEPC property or elsewhere. Examples include company social functions, both formal and informal, and client marketing events.

Definition of Harassment Harassment occurs when an individual is subjected to unwelcome verbal or physical conduct. This conduct can be based upon statutorily protected grounds such as race, religious beliefs, colour, place of origin, gender, mental or physical disability, ancestry, marital status, family status or source of income. It can also include any inappropriate and unprofessional behaviour that demonstrates a lack of respect for colleagues in the workplace.

Harassment can take many forms but generally applies to a range of behaviour and speech that is offensive, threatening, degrading, or debilitating to the recipient and may include verbal or physical abuse, threats, derogatory remarks, jokes, innuendo or taunts. Transmitting, downloading, printing or forwarding offensive material through any form of electronic media such as the internet or email is a violation of this policy.

TEPC will not tolerate the display of pornographic, racist or offensive signs or images; practical jokes that result in awkwardness or embarrassment; unwelcome invitations or requests, whether indirect or explicit.

Definition of Sexual Harassment Sexual harassment is discrimination on the grounds of gender. It is a violation of the *Alberta Human Rights, Citizenship and Multicultural Act*. Unwanted sexual advances, unwanted requests for sexual favours and other unwanted verbal or physical conduct of a sexual nature constitutes sexual harassment.

Sexual harassment can include such things as pinching, patting, rubbing or leering, "dirty" jokes, pictures or pornographic materials, comments, suggestions, innuendoes, requests or demands of a sexual nature.

When does Harassment or Sexual Harassment Occur? Behaviour need not be intentional to constitute harassment, and it need not be directed at one individual.

Harassment may involve a single incident or a series of incidents.

Harassment or sexual harassment occurs when:

1. such conduct might reasonably be expected to cause insecurity, discomfort, offence or humiliation to another person or group; or
2. submission to such conduct is made either implicitly or explicitly a condition of employment or used as a basis for any employment decision (including, but not limited to, matters of promotion, salary, job security or benefits); or
3. such conduct has the effect or might reasonably be expected to have the effect of interfering with a person's work performance or creating an intimidating, hostile or offensive work environment.

Any retaliation against an individual for having invoked this policy or for having participated or cooperated in any investigation under this policy will be subject to the same investigative and disciplinary measures as follows.

Responsibility to Report Incidents Every individual that works with TEPC is considered to have a responsibility in ensuring that the working environment at TEPC is free from harassment. This responsibility is to be discharged not only through avoidance of conduct which might constitute harassment but also through any other involvement reasonably necessary to realize the objectives of this policy.

What to do in case of harassment Any individual covered by this policy who has experienced harassment at TEPC should:

1. Tell the harasser his/her behaviour is unwelcome and ask him/her to stop.
2. Keep a record of incidents (date, times, locations, possible witnesses, what happened, your response). You do not have to have a record of events in order to file a complaint, but a record can strengthen your case and help you remember details over time.
3. If after asking the harasser to stop his/her behaviour, the harassment continues, report the problem to one of the following individuals at TEPC:
 - a. Your department Manager or Vice President
 - b. Manager, Human Resources or Vice President, Human Resources, Communications and

Administration
c. President

The individual within TEPC that the problem is reported to shall advise the complainant of:

1. The right to keep the matter at the report stage and engage in a problem-solving approach to the incident(s);
2. The right to lay a formal written complaint; and
3. Any counselling or other support services provided by TEPC.

The TEPC Code of Conduct requires from all of us the utmost professional and respectful behaviour towards our peers. If you feel that a workplace harassment complaint has not been satisfactorily addressed by the individuals noted above, you are encouraged to contact the Ethics Committee noted in the Code of Conduct.

You also have the right to contact the Alberta Human Rights and Citizenship Commission to file a complaint of harassment and, if circumstances warrant it, a charge of assault may be filed with the police.

*Resolution of Matters at
the Report Stage*

Where the individual reporting the incident decides to keep the matter at the report stage, the person who they reported the incident to will engage in a problem-solving approach to the incident. No formal investigation will be undertaken nor will written records be kept. Examples of some problem-solving approaches include assisting the individuals involved to resolve the situation themselves, informal discussions with the alleged harasser or a recommendation to management to have general educational sessions for potential problem areas within TEPC.

*Resolution of Formal
Written Complaints*

1. Where the individual reporting the incident decides to lay a formal written complaint, it shall be promptly investigated by the person whom it was reported to, another designated individual within TEPC, or where appropriate an outside investigator, in a thorough and unbiased manner.
2. This investigation would include, at a minimum, interviewing the individual(s) making the complaint, the alleged harasser(s) and any witnesses to the incident. The alleged harasser(s) should be given enough information about the allegations against them to provide them with a reasonable opportunity to respond. The identity of the individual(s) making the complaint should only be disclosed where that is essential to allow the

alleged harasser(s) sufficient information about the incident complained of to respond.

3. On completion of the investigation, the investigator will inform management, the individual(s) making the complaint and the alleged harasser(s) as to the findings and recommendations.
4. If the investigation reveals evidenced to support the complaint of harassment, the harasser will be disciplined appropriately. Discipline may include the provision of a formal apology to the victim(s); a documented reprimand in the harasser(s) employment file if they are an employee or a formal notification to the individual's employer if they are a contractor or outside vendor; referral to counselling; suspension or dismissal. No documentation will be placed on the complainant's file where the complaint is filed in good faith, whether the complaint is upheld or not.
5. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged harasser(s).
6. Regardless of the outcome of a harassment complaint made in good faith, the individual lodging the complaint, as well as anyone providing information, will be protected from any form of retaliation by either co-workers or their managers. This includes dismissal, demotion, unwanted transfer, denial of opportunities within TEPC or harassment of an individual as a result of her/his having made a complaint or having provided evidence regarding the complaint.

Confidentiality To protect the interests of all individuals involved in any process involving reported incidents or formal written complaints of harassment, confidentiality will be maintained throughout the process to the extent practicable or permitted by law.

Responsibility of Management It is the responsibility of a director, manager, or any person within TEPC supervising one or more employees, independent contractors or outside vendors, to take immediate and appropriate action to report or deal with incidents of harassment of any type 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.

TEPC seeks to provide a safe, healthy and rewarding work environment for its employees. Harassment will not be tolerated within this company. If you feel you are being harassed, please [contact us](#).

Please note: If you intend to make a complaint to the Alberta Human Rights and Citizenship Commission, it must be made within one year after the alleged incident.