



RESPECTFUL WORKPLACE POLICY

Executive Sponsor:	Senior Vice-President Corporate Services	Current Policy Effective Date:	July 27, 2018
EPCOR Contact:	Director HR Operations and Talent Acquisition	Review Frequency:	3 years
Approval Level:	Board of Directors	Next Review Date:	July 1, 2021

1. Purpose

EPCOR's Employees participate in a high performance, dynamic work environment where people are respected and accountable. EPCOR is committed to protecting the personal worth and dignity of all Employees and creating a respectful, supportive and inclusive work environment that supports diversity and equal opportunity and is free of disrespectful behaviour, discrimination, workplace bullying, harassment and physical or psychological workplace violence. EPCOR recognizes and values people for their individual skills, knowledge, abilities, experiences and contributions.

EPCOR will take action to prevent and/or address incidents of disrespectful behaviour, discrimination, workplace bullying, harassment and physical or psychological workplace violence wherever EPCOR business is being conducted.

2. Application

The Respectful Workplace Policy (the Policy) applies to all employees, officers and directors including permanent, regular, temporary and casual employees ("Employees") of EPCOR Utilities Inc. and its subsidiaries ("EPCOR"). EPCOR's contractors are also expected to comply with the relevant sections of the Policy. It applies to all EPCOR Employee interactions and events with EPCOR's customers, suppliers and business contacts and covers interactions in the workplace, through social media, and at company events or work-related gatherings.

It is also an expectation that, when representing EPCOR in the community during and outside of work hours, Employees are to conduct themselves in accordance with the behavioural expectations outlined in this policy. This is especially critical when there is an association with the EPCOR brand; for example wearing apparel with the EPCOR logo or driving an EPCOR vehicle.

3. Roles and Responsibilities

All EPCOR Employees (Management and Non-Management) are accountable for:

- A. Ensuring their actions and words contribute to a respectful work environment and are consistent with both the content and the intent of this Policy and the accompanying procedures.

- B. Abstaining from participating in, encouraging or supporting any abusive, violent, bullying, harassing, discriminatory or disrespectful behaviour.
- C. Attempting to address any contravention of this policy directly with the person or persons involved.
- D. Reporting respectful workplace issues to their Manager or to Human Resources if:
 - i. they feel unable to address the person/s or situation directly;
 - ii. the issue has not been resolved to the satisfaction of those involved after attempting to address the issue directly;
 - iii. they have witnessed abusive, violent, workplace bullying, harassing or discriminatory behaviour that negatively impacts individuals and/or the work environment and where those directly involved might be unable to resolve or report.
- E. Participating co-operatively in any investigation and providing honest accurate statements / information if requested.
- F. Complying with the notification and reporting requirements of this Policy.
- G. Being a role model of appropriate and respectful behaviour for all Employees, customers, suppliers and business contacts.
- H. Taking immediate and appropriate action to deal with any disrespectful, harassing, bullying, violent, or discriminatory behaviour.
- I. Consulting with Human Resources for advice or assistance to ensure consistent and proper handling of situations involving allegations of harassment, workplace bullying, violence, discrimination or disrespectful behaviour.

Human Resources is accountable for:

- A. Responding to enquiries and providing advice or assistance to Employees who have concerns regarding harassment, workplace bullying, violence, harassment, discrimination or disrespectful behaviour.
- B. Providing advice or assistance to EPCOR Employees, Supervisors/Managers, or EPCOR's customers, suppliers and business contacts to ensure that, as an organization, we are dealing with allegations of harassment, workplace bullying, violence, harassment, discrimination or disrespectful behaviour in an appropriate and consistent manner.
- C. Ensuring that the Policy is distributed or posted in accessible places and easily retrievable.
- D. Ensuring all EPCOR Employees are trained so that they understand the Respectful Workplace Policy, the procedures, how to recognize violations of the Respectful Workplace Policy, and the Procedures and Accountabilities when reporting an incident.
- E. Ensuring that there is a mechanism in place to coordinate expertise through various EPCOR departments depending upon the Respectful Workplace situation (Security, Legal/Ethics, IS, HSE and HR). Depending upon the specifics of the situation, the Director, HR Operations and Talent Acquisition may need to deputize others in the corporation to act as Assisting Investigators depending on the subject matter requirements. HR will ensure that those seconded to the case will receive a memo setting out the scope of what they need to do, confidentiality requirements etc.

- F. Comply with the notification and reporting requirements of the Policy.
- G. Ensure that corrective actions are a critical component of every investigation and that timely and effective measures are undertaken to continually reduce risk and workplace hazards.
- H. Conducting investigations in accordance with this Policy and the associated Procedures.
- I. Ensure that once a serious respectful workplace violation situation is known, measures to re-establish psychological and physical safety occurs immediately for all involved.
- J. Advising the involved Employees that if they have experienced disrespectful behaviour, discrimination, workplace bullying, harassment or workplace violence that they can consult with a personal or company sponsored health professional or physician.

4. Policy Requirements

EPCOR Assessment of People

EPCOR will assess all Employees by their qualifications, demonstrated skills and achievements.

Prevention

EPCOR is committed to preventing violations of this policy through communication and employee training on the requirements of the policy and by ensuring a fair, thorough and timely process for resolution of complaints or other circumstances where a potential violation of the policy is observed.

Good Faith Complaints

Every EPCOR Employee has the right to report, in good faith, concerns or incidents of disrespectful behaviour, discrimination, workplace bullying, harassment and workplace violence without fear of retaliation.

No Retaliation

Retaliation against anyone who reports an incident in good faith will not be tolerated and will be subject to appropriate disciplinary action, up to and including termination of employment.

Bad Faith Complaints

Any EPCOR Employee who makes a complaint that is found to be made in bad faith will be subject to appropriate disciplinary action, up to and including termination of employment or termination of employment contract.

Employee Support

EPCOR will provide necessary support to any employee affected by an incident of harassment or violence.

5. Compliance

Non-compliance with the terms of this policy may be subject to corrective action up to and including termination of employment.

6. Definitions

Discrimination

Discrimination is defined as treating an individual or a group differently than others on the basis of one or more of the legislated protected grounds and in such a way as to have a negative impact on that individual or group. Discrimination can be either intentional or unintentional. EPCOR's protected grounds of discrimination include:

- ancestry, race, colour or nationality/place of origin
- disability (physical or mental)
- religious beliefs or religion
- sexual orientation
- marital status
- source of income
- military or veteran status
- gender, gender identity and gender expression
- age
- family status or pregnancy
- any other prohibited ground of discrimination defined by the legislative jurisdictions in which EPCOR operates

Discrimination based on any of the above legislated protected grounds is considered reasonable and justifiable only if it is based on bona fide occupational requirements.

Sexual Harassment

For the purposes of this policy and in addition to how it may be defined under applicable legislation, sexual harassment means:

- any comment, conduct, gesture or contact of a sexual nature that is unwelcome and that is likely to cause offence, embarrassment or humiliation to an individual;
- a comment, conduct, gesture or contact of sexual nature that might, on reasonable grounds, be perceived as placing a condition of a sexual nature on employment, working conditions or opportunity for training or promotion.

Specific examples of sexual harassment can be found in the *Examples, Procedures, and Accountabilities* addendum to this policy.

Disrespectful Behaviour, Workplace Bullying, and Harassment

EPCOR does not tolerate disrespectful behaviour, workplace bullying, and harassment in the workplace.

For the purposes of this Policy and in addition to how they may be defined under applicable legislation, disrespectful behaviour, workplace bullying, and harassment means any unwelcome comments or conduct that is hurtful, malicious or humiliating and which creates an offensive, hostile, poisoned or intimidating work environment which adversely affects an Employee's ability to work or otherwise adversely affects an Employee's employment opportunities.

Disrespectful behaviour, workplace bullying, and harassment does not include reasonable performance management or the legitimate exercise of supervisory authority.

Specific examples of disrespectful behaviour, workplace bullying and harassment can be found in the *Examples, Procedures, and Accountabilities* addendum.

Workplace Violence

For the purposes of this Policy and in addition to how it may be defined under applicable legislation, workplace violence means threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury at a work site or is work related, including domestic or sexual violence. Workplace violence can take many forms, it can be physical or verbal, and it can occur between two or more employees, between employees and customers, suppliers, contractors or the general public. It can also occur between an employee and a spouse, relative, or acquaintance who seeks him or her out in the workplace.

Behaviours that are threatening to personal safety, including bringing to or using weapons at the workplace, or are violent, be they domestic or workplace related, require immediate action to prevent escalation and to ensure the safety of others.

Specific examples of workplace violence can be found in the *Examples, Procedures, and Accountabilities* addendum.

Reference

Respectful Workplace Addendum: *Examples, Procedures and Accountabilities* (copy attached).

Respectful Workplace Addendum: Examples, Procedures and Accountabilities for Canada

Examples

Contact and Intake for Respectful Workplace Advice or Complaints:

- your manager
- your Human Resource Consultant
(refer to EPCOR's intranet for contact information)
- Director, HR Operations (780) 412- 6977
- Integrity HotLine: eprite1epcor.com or 1-888-EPRITE1 (1-888-377-4831)

Discrimination

Discrimination at EPCOR is defined as treating an individual or a group differently than others based on any of the protected grounds listed in the Respectful Workplace Policy.

An example of discrimination would be if an EPCOR manager chose one job applicant over another equally qualified candidate because of religious beliefs or affiliations.

Sexual Harassment

Sexual harassment may include, but is not limited to, such actions as:

- inappropriate teasing,
- jokes of a sexual nature,
- direct or indirect sexual comments or suggestions,
- sexually suggestive pictures,
- leering, or
- Physical contact such as patting, pinching, hugging or brushing up against another's body.

Disrespectful Behaviour, Workplace Bullying, and Harassment

Examples of disrespectful behaviour, workplace bullying, and harassment include, but are not limited to:

- written or verbal comments, conduct, actions, or gestures or other behaviours or jokes which are humiliating, persecuting, mobbing, ridiculing, belittling, offensive, hurtful or disparaging;

- yelling or shouting;
- deliberately excluding an Employee from relevant work activities or decision making;
- decision-making which is influenced by factors which have no work-related reason or rationale;
- attempting to discredit an Employee by spreading false information about him/her;
- actions that affect an Employee's dignity, wellbeing, or integrity;
- covert and overt tactics of diminishing an Employee's self-worth and self-confidence which can psychologically cause trauma over time;
- insults, abusive language, intimidation, threats, coercion;
- social isolation and disempowerment.

Workplace Violence

Workplace violence can cause physical and psychological distress. Examples of workplace violence that violate the Respectful Workplace Policy may include, but are not limited to:

Threats:

- any act, gesture or statement that gives an Employee reasonable cause to believe that there is risk of injury or harm to themselves, another person or EPCOR property;
- any statement, either verbal or written, that is reasonably interpreted by a person to be menacing or taunting in nature;
- communication including body language or behaviours that indicate that the offender intends to do harm to an individual or group;
- includes threatening behaviours such as, shaking fists, throwing things, destroying property, or wielding weapons (or articles that could be used as, or perceived to be, weapons).

Physical Violence:

- the use of force including hitting, shoving, pushing or kicking;
- inciting others to do harm;
- any intentional act that causes, or may cause, physical harm by or against an Employee.

Procedures

Concerns of EPCOR Employees regarding alleged discrimination, workplace bullying, violence, disrespectful behaviour or harassment may be raised through a variety of avenues depending on the situation and the preference of the individual raising the concern. These avenues include, but are not limited to the following:

1. Inquiry

- a) Any EPCOR Employee may make a confidential inquiry regarding the Respectful Workplace Policy or an alleged violation of the Policy. This inquiry may be raised with any EPCOR Manager or a representative from Human Resources.

- b) If the EPCOR Manager or the representative from Human Resources consulted is unable to provide the necessary information, the EPCOR Employee's inquiry/concern is to be forwarded promptly to the Director, **HR** Operations and Talent Acquisition.
- c) The EPCOR Employee, customer, supplier or business contact can also call the Integrity HotLine at 1-888-EPRITE1 (1-888-377-4831) or eprite1@epcor.com.

2. Advice and Assistance

- a) An EPCOR Employee, who wants to discuss a potential violation of the Respectful Workplace Policy and/or look at attempting to resolve it him/herself, can meet confidentially with his/her Manager or a representative from Human Resources to consider various approaches or courses of action.
- b) Contractors and suppliers for EPCOR will receive the Respectful Workplace Policy through the Supply Chain department as part of their business partnership information.

3. Informal Complaint Resolution/Intervention

- a) At any time, an Employee or a Manager can request that an intervention or an attempt at an informal resolution be made. The intervention or informal resolution can be attempted by Human Resources or, the Manager. Interventions will attempt to confidentially achieve a mutually acceptable resolution to the situation.

4. Formal Complaint

In situations where there are formal allegations of harassment, discrimination, violence, workplace bullying or disrespectful behaviour, an investigation is conducted by a designate from Human Resources or, depending on the circumstances, in accordance with the requirements of EPCOR's Ethics Policy. Based upon the specifics of the situation, the Director, HR Operations and Talent Acquisition will appoint an HR representative to commence the investigation or will transfer the investigation to the EPCOR Ethics Officer as required.

a) Investigation:

- i. In general, at some point in the investigation, the individual/s against whom the complaint has been made, that individual/s' immediate Manager and the Manager once-Removed are notified. However, depending upon the circumstances, notification may not occur if deemed inappropriate. If any involved Employee is represented by an EPCOR union, that union is also notified of the investigation.
- ii. If the investigation involves individuals at an S4 level or higher, the case will be handled by the EPCOR Ethics Officer.
- iii. The investigation is conducted in as timely and confidential a manner as possible.

- iv. The individual alleging the harassment, workplace bullying, physical or psychological violence, disrespect or discrimination (the Complainant) is interviewed and information pertaining to the complaint is collected.
- v. Witnesses and other relevant individuals are interviewed next and copies of relevant documents are collected.
- vi. The person against whom the allegations have been made (the Respondent) is interviewed for his/her response to the allegations.
- vii. Any bargaining unit Employee being interviewed in connection with the investigation is permitted to have a union representative attend the interview if they so choose and if the union representative is available.

b) Determination:

- i. The information collected is compiled and analyzed and a determination made as to whether or not the allegations of a breach of this Policy have been substantiated.
- ii. A list of recommendations is developed from the determination.
- iii. The determination and the list of recommendations are presented to the direct Manager and the Manager once-Removed from the involved business unit(s).
- iv. Based upon the specifics of the situation, the Director, HR Operations and Talent Acquisition appoints an HR representative to meet separately with the Complainant and with the Respondent to review the findings and the general recommendations.
- v. If it is an Ethics Officer investigation (S4 or higher) the Ethics Office provides a report and recommendations to the Ethics Committee. The Ethics Committee makes a determination as to whether there was a breach and, if so, the outcome of the breach (discipline, termination). The SVP from the impacted area and other managers may have input into that determination but the Ethics Committee makes the final decision.

c) Outcome:

- i. If the investigation concludes that there has been a breach of this Policy, appropriate discipline for the Respondent, up to and including dismissal, is determined and administered by business unit management working in consultation with Human Resources. A record of the discipline referencing the nature of the complaint is placed in the respondent's file. The union is advised of the discipline in cases involving bargaining unit Employees.
- ii. Investigation files and a record of all violations and discipline remain in the Human Resources files in accordance with privacy requirements, the EPCOR Retention Policy, and collective agreements, if applicable.
- iii. If the investigation does not substantiate the allegations, the complaint is dismissed and no record of the complaint is placed in the Respondent's file. No record of the complaint is placed in the Complainant's file unless it is determined in the investigation that the complaint was made in bad faith.

d) Appeal:

Either the Complainant or the Respondent may appeal the findings of an investigation based on one or more of the following reasons:

- i. The investigation process was flawed.
- ii. Relevant information provided to the investigator during the investigation was not considered.

The appeal must be filed in writing and forwarded to the Senior Vice President responsible for Human Resources within ten working days of receiving the findings. The Senior Vice President responsible for Human Resources reviews the appeal to determine if there are sufficient grounds to proceed and informs both the Complainant and the Respondent whether the appeal is proceeding.

If the appeal proceeds, the Senior Vice President responsible for Human Resources provides the Complainant and the Respondent with a written response to the appeal within ten working days of receiving the written request for an appeal. If the original findings are overturned, the Senior Vice President responsible for Human Resources provides a new determination and recommendations.

- iii. EPCOR's Respectful Workplace Policy is not intended to discourage or prevent the complainant from exercising any other legal rights pursuant to any other law. EPCOR respects the right for employees to file a complaint with their provincial Human Rights Commission (if applicable to the situation) and respects that in some provinces employees can request the assistance of an Occupational Health and Safety Officer (if applicable to the situation).