

WORKPLACE DISCRIMINATION, HARASSMENT, AND VIOLENCE PREVENTION POLICY

Stella-Jones Inc. (the “**Company**” or “**Stella-Jones**”) is committed to the prevention of workplace harassment, discrimination and violence and the advancement of worker health and safety. We are dedicated to taking steps to protect our employees from the potential hazards associated with workplace harassment, discrimination and violence. Harassment, discrimination or violent behaviour or threat of violence in the workplace will not be tolerated by anyone at or outside of the workplace. The purpose of this policy is to confirm that the Company strictly prohibits discrimination, harassment and violence in the workplace, in particular by setting out the means it takes to control and eliminate the risk of harassment.

This policy applies to all employees and to all persons doing business with Stella-Jones. It covers workplace harassment, discrimination and violence by employees of the Company (including supervisors and management), customers, vendors, or other third parties with whom the Company has business dealings.

This policy applies in particular in the following places and contexts:

- workplaces, including telecommuting locations, where applicable;
- any other place where employees are likely to be in the course of their work (e.g.: common areas on Company premises, during meetings, training, travel);
- at work-related social events;
- during any communication transmitted or received by technological or other means (e.g. cyberbullying), in a work context.

We are committed to:

- investigating all complaints regarding incidents of workplace harassment, discrimination and violence in a timely and objective manner
- taking necessary action and/or
- providing support for victims

All employees and persons doing business with Stella-Jones are expected to uphold and abide by this policy by refraining from any form of harassment, discrimination or violence. All employees and persons present must also cooperate fully in any investigation of a discrimination, harassment or violence complaint.

Should any situation arise where an employee believes he or she is being the object of discrimination, harassment or violence, the employee should follow the Complaint and Settlement Procedure set out in Section 7 below.

1. Workplace Discrimination

Discrimination means any form of unequal treatment based on a prohibited ground. It may be intentional or unintentional and it may involve direct and obvious actions or occur indirectly or in subtle ways.

The prohibited grounds of **discrimination** include, but not limited to, the following: age, citizenship, color, civil status, ethnic origin, handicap (disability), sex (gender) and pregnancy, sexual orientation, race, religion, as well as any other ground protected by the legislation (laws) applicable in the jurisdiction where you work.

2. Harassment

Harassment/Bullying means a course of comments or actions that are known, or ought to be reasonably known, to be unwelcome. It includes, but not limited to, words, actions, gestures that are embarrassing, humiliating, demeaning, intimidating or hurtful based on a ground of discrimination identified above or prohibited by legislation.

Psychological Harassment is vexatious (upsetting, hurtful) behaviour that manifests itself in the form of conduct, verbal comments, actions or gestures characterized by the following four (4) criteria: (1) they are repetitive. A single incidence of such behaviour may also constitute psychological harassment if it undermines the person's psychological or physical integrity and if it has a lasting harmful effect. (2) they are hostile or unwanted (3) they affect the person's dignity or psychological integrity, and (4) they result in a harmful work environment.

Sexual Harassment is a form of harassment that includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. It includes, but not limited to, situations where (1) submission to the conduct becomes either an explicit or implicit term or

condition of employment; (2) an employee's reaction to the conduct is used as a basis for employment decisions affecting that employee; or (3) the conduct has the purpose or effect of interfering with the employee's work performance or creating an intimidating, hostile or offensive working environment.

No employee or applicant should be subjected to unsolicited and unwelcome sexual overtures. Nor should any employee or applicant be led to believe that an employment opportunity or benefit will in any way depend upon "cooperation" of a sexual nature.

Sexual harassment is not limited to demands for sexual favors. It also may include, but not limited to, such actions as: (1) sexually-oriented verbal "kidding", "teasing", or jokes; (2) repeated offensive sexual flirtations, advances, or propositions; (3) continued or repeated verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual or his or her appearance; (5) the display of sexually suggestive objects or pictures; (6) subtle pressure for sexual activity; and (7) physical contact or blocking movement.

Sexual harassment does not refer to occasional compliments of a socially acceptable nature or consensual personal and social relationships without a discriminatory employment effect. It refers to behavior which is not welcome, and which is personally intimidating, hostile or offensive.

3. Workplace Harassment

Workplace Harassment includes, but not limited to, any form of vexatious and repeated conduct or behaviour towards an individual that belittles, torments, undermines, frustrates and affects an employee's dignity or integrity, and that results in a harmful work environment. Workplace harassment does not need to be based on a prohibited ground of discrimination. Workplace harassment will usually not include a single incident of misconduct unless it is severe and has a lasting impact on the person.

The seven keys to preventing psychological or sexual harassment are as follows:

- Respect for people at work
- Open communication between employees and management
- Equitable distribution of workloads
- Promotion of collaboration
- Clearly established expectations and quickly cleared up misunderstandings
- A match between the job requirements and the skills of the people
- Clearly defined tasks, roles and responsibilities

4. Workplace Violence

Violence, whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence.

Violence in the workplace could put workers at risk of physical or psychological harm. Workplace violence can include:

- Physical attack or aggression (e.g. hitting, shoving, pushing or kicking a worker, throwing an object at a worker, kicking an object a worker is standing on such as a ladder)
- Threatening behavior (e.g. shaking a fist in a worker's face, wielding a weapon at work, trying to hit a worker, trying to run down a worker using a vehicle or equipment such as a forklift, destroying property or throwing objects)
- Verbal or written threats (e.g. verbally threatening to attack a worker, leaving threatening notes or sending threatening emails to express intent to inflict harm on a worker)
- Domestic violence
- Sexual violence

Domestic violence is a pattern of behavior used by one person to gain power and control over another with whom the person has or has had a personal relationship, including dating, marriage, adult interdependent partnerships, custody, blood relationships and adoption. Behaviors can range from subtle, intimidating behaviors to violent acts that result in physical harm or death. Domestic violence can include physical violence, sexual abuse, financial control, emotional and psychological intimidation, verbal abuse, stalking and using electronic devices to harass and control.

Domestic violence becomes a workplace hazard, not a limited personal issue, when it occurs at, or spills over into, the workplace. It may put the targeted employee at risk and may pose a threat to co-workers.

Sexual violence as a workplace hazard refers to any sexual act, attempt to obtain a sexual act or other act directed against a worker's sexuality using coercion, by any person regardless of their relationship to the victim, in the workplace or work-related setting. Sexual violence exists on a continuum from obscene name-calling to rape and/or homicide and includes on-line forms of sexual violence (e.g. Internet threats and harassment) and sexual exploitation.

5. Prevention of Harassment and Violence

In accordance with its legal obligations, the Company has implemented measures aimed at identifying, controlling and eliminating the risks of any form of harassment and violence, in particular by:

- a) distributing this policy to all employees via the intranet;
- b) maintaining continuous vigilance with regard to risks and risk factors likely to generate situations of harassment, and periodically reviewing the policy as needed to make any required adjustments;
- c) ensuring that the policy is understood and respected by all employees;
- d) promoting respect between individuals;
- e) making employees aware of their roles and responsibilities in preventing harassment and violence;
- f) implementing a training and awareness program for staff;
- g) implementing a training and awareness program for people designated to receive and handle harassment complaints and reports;
- h) holding meetings with people who leave their jobs voluntarily to find out the reasons for their departure;
- i) adopting a diligent process for handling complaints and reports.

6. Responsibilities

Supervisors and members of management of the Company are responsible for taking measures to ensure the maintenance of a work environment free from harassment and violence, in particular by applying this policy. Accordingly, any member of management or supervisor who is informed of or becomes aware of acts prohibited by this policy must intervene with the persons involved and report the incident.

All employees must comply with this policy by helping to maintain a workplace free from all forms of harassment or violence. This obligation applies not only in the normal course of work, but also at all work-related social events, where employees are expected to conduct themselves in a civil and harassment-free manner.

The Company is committed to adopting the actions required to ensure a harassment-free working environment. If harassing behavior is reported, efforts will be made to put an end to it.

To this end, the Company undertakes to:

- Respond promptly to and handle all complaints and reports;

- Protect the dignity and confidentiality of the individuals involved, including the complainant, the person subject of the complaint and witnesses;
- Ensure fair, equitable and humane treatment for all participants, providing them with the necessary support;
- Maintain confidentiality around intervention procedures and information associated with complaints or reports;
- Propose, with the consent of the parties and depending on the circumstances, a mediation session aimed at resolving the conflict in a neutral and impartial setting;
- if necessary, conduct an investigation without delay and in an objective, neutral and impartial manner or, if internal resources are not available or if they do not have the skills required to do so, to entrust responsibility to an external party in order to preserve the impartiality of the intervention and ensure its quality. The persons concerned will be informed of the outcome of this procedure. If the investigation does not establish that unacceptable behavior has occurred, all material evidence will be retained for two (2) years and destroyed thereafter;
- Apply all reasonable measures to remedy the situation, including appropriate disciplinary action if necessary;
- Regularly review and update harassment prevention measures to ensure their effectiveness and avoid the recurrence of such incidents.

7. Complaint and Settlement Procedure

Any employee who feels that he or she has been the subject of workplace harassment, discrimination or violence (or who has reason to believe that someone else has been the subject of workplace harassment, discrimination or violence) should follow the following procedure:

1. If comfortable doing so, tell the person firmly that their behaviour (comments or contact) are not wanted and to stop immediately. Very often, a person is unaware that the behaviour is inappropriate and will modify his or her actions when told about it. If you are uncomfortable raising the issue directly with the person, go immediately the next bullet point.
2. If the behaviour continues, or if you are uncomfortable discussing the issue directly with the person, report it to your supervisor (unless your supervisor is involved) or to the Human Resources department or any member of senior management .

3. Alternatively, a complaint using the Company's third-party whistleblower reporting system as follows:
 - Online through the secure website at <http://www.clearviewconnects.com>.
 - Over the phone through the Stella-Jones Inc. dedicated toll-free number 1-844-851-6848
 - By mail through the confidential post office box at: P.O. Box 11017, Toronto, Ontario M1E 1N0

Steps in an investigation:

1. A Human Resources representative or an impartial person will meet with the complainant. The complainant will be expected to provide the information that the Company requests, including a detailed account of the incidents complained of, witnesses (if any), dates, and other information considered relevant by the Company.
2. Human Resources or an impartial person will conduct a prompt and thorough investigation into all circumstances of the complaint, which includes:
 - Interviewing the complainant (see above)
 - Interviewing the respondent (i.e. alleged perpetrator)
 - Interviewing witnesses

All employees, whether complainant, witness or alleged perpetrator - are required to be truthful, accurate, and cooperative during Company investigations, failing which disciplinary measures, including termination of employment, may be taken.

Information obtained in the investigation process, including any investigation report, will be kept confidential and will only be communicated on a “need to know” basis.

3. Human Resources or an impartial person will determine, based on the evidence gathered during the investigation, whether harassment, discrimination or violence has occurred.
4. Human Resources or an impartial person and senior management will determine the effective resolution to the harassment, discrimination or violence claim and will communicate such resolution to the complainant and respondent.

Anyone who is found to have engaged in prohibited harassment, discrimination or violence will be subject to appropriate sanctions, which may be administrative or disciplinary in nature, and may lead to termination of employment and in certain cases, immediate termination. Letters of discipline will be maintained in the employee file; if behavior continues, further disciplinary actions, up to and including termination will be considered.

No one should be presumed to be in violation of the policy because an investigation is being conducted. However, during the investigation, Stella-Jones may take any temporary steps it considers appropriate to safeguard either of or both the complainant and the respondent from any further work-related issues. Such temporary step may include, depending on the circumstances, a temporary reassignment, a suspension pending investigation or any other type of measure.

Anyone filing a complaint in bad faith or with the intention of harming another person may be subject to disciplinary action, including immediate dismissal.

In summary:

Do:

- Respect the people you work with
- Be aware of what you e-mail and display at work
- Know your rights with regards to harassment, discrimination or violence
- Tell a person if they are behaving in a manner that you find discriminatory or harassing
- Report harassment, discrimination or violence if it occurs to you or in your presence

Don't:

- Make discriminatory comments while in the workplace
- Make unwanted physical contact with co-workers apart from handshakes
- Ignore harassment, discrimination or violence if it occurs to you or you see it occurring to others
- Make false claims of harassment, discrimination or violence

8. No Reprisal or Retaliation

It is the policy of the Company that no one may be retaliated against for making a complaint of harassment, discrimination or violence based upon an honest perception of the events or for cooperating in the investigation of a complaint. The Company may impose disciplinary measures on persons who take such reprisals.

9. Approval and Review

This policy is reviewed by the Board of Directors of the Company on an annual basis to ensure compliance with applicable State and provincial legislations and revised as appropriate.

This policy was approved by the Board of Directors of the Company on December 11, 2025.