

Policy and Practices Harassment in the Workplace

OBJECTIVE

The objective of this policy is to maintain a work environment founded on trust and respect and to affirm the commitment of the management and personnel of Canam Group Inc. and its subsidiaries (“Canam Group”) to prevent and address any form of harassment.

SCOPE

This policy applies to all Canam Group employees inside or outside the workplace engaging in work-related activities during or outside regular working hours.

BASIC PRINCIPLES

Harassment at work is prohibited and will not be tolerated by Canam Group. This policy, however, does not limit the authority of supervisors to exercise their management rights, particularly their right to evaluate performance, manage employee relations, take administrative and/or disciplinary action, organize work or assign tasks. Any complaint concerning harassment will be handled swiftly and impartially. Failure to comply with this policy will result in administrative and/or disciplinary action and could even lead to dismissal. A complaint made in bad faith will be treated as a violation of this policy.

DEFINITION

Harassment means any vexatious behaviour, in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute harassment.

RESPONSIBILITY OF PERSONS IN AUTHORITY

It is the responsibility of all persons in authority, should they become aware of a situation involving harassment, to take reasonable action to put an end to the harassment.

RESPONSIBILITY OF EMPLOYEES

All employees have the responsibility to behave in a manner that is respectful and free of harassment. Employees who witness any form of harassment whatsoever must report such behaviour.

COMPLAINT PROCEDURE

Before filing a complaint, a person who believes he or she has been harassed must first try to find a solution to the harassment by discussing the problem with the offender and/or the immediate supervisor and/or the facility's HR representative. The Employee Assistance Program (EAP) is another means available in the workplace to resolve a situation involving harassment. A person who believes he or she has been harassed may file a complaint with the facility's HR representative. The complaint must be filed in writing within 90 days of the last incidence of such behaviour. The complaint will be handled in accordance with the complaint procedure attached to this policy.

CORRECTIVE ACTION

The facility's HR representative will determine what corrective action is appropriate, taking into account the seriousness of the unwanted behaviour and other relevant factors. This administrative and/or disciplinary action may entail one or more of the following measures:

- temporary measures before and after the investigation (e.g.: suspension, reassignment);
- formal apology;
- verbal or written warning;
- participation in a training session on appropriate behaviour in the workplace;
- counselling sessions with expert resources (e.g.: psychologist, psychotherapist);
- suspension;
- reassignment;
- demotion;
- dismissal.

PROTECTION OF THE PERSONS INVOLVED IN THE PROCEDURE

Every person has the right of access to the policy without fear of reprisals, unless there is a deliberate attempt to mislead by making a false statement to the effect that a person committed harassment. Any person can testify without fear of reprisals, unless such testimony is given with the intent to mislead by making a false statement.

RECOURSE

The use of this internal policy does not limit access to other recourses.

CONFIDENTIALITY

Harassment records are strictly confidential and are treated in such a way as to respect their confidentiality.

REVISION OF THE POLICY

This policy may be revised as required.

Policy and Practices Complaint Procedure

1. FILING OF THE COMPLAINT

A person who believes he or she has been subjected to harassment may file a complaint with the facility's HR representative. The complaint must be filed in writing within 90 days of the last incidence of such behaviour. It must state the nature of the alleged acts, the name of the person accused of harassment, the date and, if applicable, the names of the witnesses. The complaint must be signed by the person filing it. Upon receipt of the complaint, the facility's HR representative must:

- study the complaint;
- meet with the complainant;
- decide whether the allegations constitute harassment;
- inform the complainant that the complaint was dismissed if the allegations do not satisfy the definition of harassment;
- inform the person accused of harassment of the complaint, detailing the allegations if the allegations satisfy the definition of harassment.

2. MEDIATION

If the circumstances warrant it, the facility's HR representative may recommend mediation to the persons concerned. If the parties refuse mediation or if the mediation fails, an investigation will be launched.

3. INVESTIGATION

The investigation will be led by the facility's HR representative, who must:

- Inform the parties of their right to be accompanied and their responsibility not to comment on the facts of the complaint.
- Meet with the parties, obtain the names of the witnesses and also meet with the witnesses.
- When circumstances warrant it, obtain statements from the parties and the witnesses. All statements should preferably be written and signed, except for those obtained from the witnesses who may, for one reason or another (if they reside far away, for example), be questioned via the telephone or e-mail.
- Inform the persons concerned that the statements obtained are subject to the applicable Protection of Personal Information legislation.
- Prepare a report of the investigation containing a summary of the allegations and the evidence obtained, an analysis of the evidence and a conclusion stating whether all or part of the complaint is founded, unfounded or vexatious.

4. DECISION

The decision will be rendered by the HR representative and approved by the Vice President, Human Resources, of the facility in question. The parties must be promptly informed that the complaint was dismissed or that it was upheld and, if upheld, what administrative and/or disciplinary action will be taken.