

Appendix "H"

CONIFEX TIMBER INC. RESPECTFUL WORKPLACE POLICY

1. Introduction & Policy Statement

Conifex Timber Inc. ("**Conifex**", "**we**", "**our**" or the "**Company**") is committed to providing a safe, healthy and supportive work environment as well as ensuring we treat our employees, contractors and clients with respect, dignity and equality. Our goal is to be compliant with applicable legislation and take all reasonable steps to ensure a respectful workplace that maintains the safety, dignity and equality for all.

We are entitled to work in an environment that is safe, respectful and free of harmful behaviour such as bullying, harassment, discrimination and violence. Any form of bullying, harassment, discrimination, including cyber bullying, harassment and violence through email, internet and/or any other form of social media, is **prohibited and cannot be condoned or tolerated**. At Conifex, everyone is accountable to conduct themselves in a respectful and professional manner while representing our organization.

Alleged breaches of this policy will be taken seriously and dealt with expeditiously and appropriately. If a breach of this policy is substantiated via the investigation, corrective action will be taken. Corrective action will be taken into consideration and be proportional to the seriousness and/or repetitive nature of an offence(s) under this policy. Corrective action may comprise, but is not limited to one or more of the following; coaching, counselling, education, instruction, training, mediation and/or progressive discipline up to, and including termination.

The following procedures are guidelines only and do not create additional substantive rights for the employees or additional obligations for the Company. These procedures are merely examples of steps and consideration that may be appropriate depending on the facts of each case. The Company retains discretion to modify or bypass any portion of these procedures.

2. Purpose

The purpose of this policy is to:

- create a respectful work place free of bullying, harassment, discrimination or violence;
- outline individual accountability, responsibility to administer and comply with this policy;
- provide employees with the training and tools to manage and resolve conflict;
- implement appropriate procedures to effectively investigate and resolve complaints under this policy;
- protect employee's health & safety under applicable legislation such as the *Workers*

Compensation Act RSBC 2019, c-1 (the "WCA") and applicable human rights legislation;

- take corrective action when violations of this policy occur; and
- educate on what a respectful workplace is, how to identify various forms of bullying, harassment and discrimination and how to prevent these behaviours.

3. Scope of this Policy

This policy is an all-encompassing and comprehensive policy addressing:

- respectful workplace practices & procedures;
- bullying & harassment;
- human rights discrimination;
- sexual harassment;
- criminal harassment; and
- workplace violence.

This policy is applicable to Conifex, including all subsidiaries. The elements of this policy shall apply to all employees of the Conifex, its subsidiaries and other individuals doing business with Conifex, and include:

- promoting cooperative and collaborative behaviour between co-workers;
- using active listening skills and being open to other's points of views and differences of opinion;
- promoting healthy group dynamics and discussions;
- being self-aware that one's actions or behaviours can have a negative impact on other people;
- separating the personality from the issues and focus on the problem not the person;
- respecting that there are individual differences between people and that others may have a different approach to doing things that are not wrong; rather they are just different approaches; and
- having a goal, to resolve conflict in a constructive manner to generate productive solutions to conflict.

4. Examples of Behaviour or Actions that Are Not Considered a Violation of This Policy:

- consensual and good-natured joking and banter;
- healthy, respectful social interactions;
- non-threatening or non-abusive interpersonal conflict that results from normal pressures in a workplace;
- expressing differences of opinion;
- legitimate exercising of management functions, rights or authority including, but not limited to, performance reviews and performance management activities;
- counselling or coaching sessions and offering feedback, guidance or advice about work behavior;
- discipline imposed by the employer for just cause purposes;
- layoff, transfers, promotions or reorganizations;
- changing the work to be performed or the working conditions where required; and
- termination of the employment relationship for valid reasons and/or just cause.

5. Respectful Workplace & Conflict Resolution Procedures

5.1 Informal Conflict Resolution Process:

When possible as a first step, individuals are encouraged to utilize the informal conflict resolution process. Doing so, may preserve an amicable working relationship between the parties as opposed to using the Formal Investigation & Resolution Process outlined below as a first step to resolve conflict. Employees are encouraged to discuss the issue directly with the other individual(s) involved in the conflict or bullying behaviour by:

- clearly and calmly telling the other party(s) acting in a disrespectful fashion what specific behaviour was inappropriate, unwanted and that you don't appreciate their behavior; and
- clearly and calmly telling the other party(s) that you are offended and object to this type of behaviour and to cease the behaviour immediately.

If the issue cannot be resolved at this stage and the behaviour continues, inform your supervisor or other management representative outlined in parts 5.2 and 5.3 below for assistance to resolve the issue. If the issue is still not resolved at this level, then pursue the issue through the Formal Investigation & Resolution Process outlined below.

5.2 Supervisor Assistance to Resolve Conflict:

Your supervisor can assist with resolving conflict if an issue is not resolved via the informal process in part 5.1 above. If the issue can be rectified with the supervisor's assistance, it will be deemed to be resolved. If uncomfortable approaching a supervisor with such issues, and/or the supervisor is involved in the conflict, refer to parts 5.3 or 5.4 below.

5.3 Other Management Representatives Available for Assistance to Resolve Conflict:

If conflict cannot be resolved via parts 5.1 and/or 5.2 above, or if the supervisor is part of the conflict, then approach the Human Resources Department for assistance.

If you suspect misconduct, irregularity, or other questionable matters regarding accounting, internal accounting controls or auditing matters, immediately contact your supervisor, or counsel or the Audit Committee.

5.4 Formal Investigation & Resolution Process:

Formal complaints of under this policy will be investigated and dealt with promptly based on the following steps:

Step 1 - Completing the Respectful Workplace Complaint Form: Complainants may complete, sign and date a Respectful Workplace Complaint Form (Appendix B) and forward it to the office of the human resources representative (the "**HR Representative**"). Complainants may withdraw their formal complaint by written notice to the HR Representative (Appendix C). The Company has the right and obligation to pursue investigations even where there is no complainant or the complainant withdraws their complaint. When a written statement is provided by the complainant to the Human Resources Department, a copy of the written allegations will be provided to the respondent to provide them with an opportunity to respond to the allegations as part of the investigation.

Step 2 - Preliminary Review: The HR Representative will review all reported incidents.

Step 3 - Investigation: Investigations will be conducted by the appropriate HR Representative maintaining the highest standard of confidentiality. When using external resources, the HR Manager and/or Operations Managers will be consulted before securing the services of a professional investigator. On occasion, an investigation may reveal other unrelated issues occurring in the workplace. In those situations, the HR Representative will communicate and consult the matter to the appropriate manager for further action.

Step 4 - Decision: If a complaint is substantiated, the HR Representative will work with the accountable manager to identify appropriate corrective action or discipline and communicate the decision to the complainant(s) and respondent(s).

Step 5 - Corrective Action: Where appropriate, the HR Representative will notify the complainant's supervisor of the situation and outline the corrective action that will be undertaken including an action date. The responsibility for monitoring all activities associated with the remedy and the associated case management remains with the HR Representative.

Step 6 - Follow-up and Closure: The HR Representative will monitor the outcome of all substantiated cases, and all false or malicious accusations, to ensure that parties comply with the corrective measures and that the problems are resolved.

Note: The process noted above may differ at Conifex locations where incidents of violence must follow specific investigating procedures and reporting to external bodies to meet provincial regulations.

All complaints related to behaviour of supervisors or managers should be reported to the local HR Representative. Concerns related to behaviour by the local HR Representative should be reported to the Regional Human Resources Manager.

In cases where criminal activity is alleged, Conifex may inform the appropriate authorities and cooperate fully. Conifex may be required to suspend an internal investigation until such time as the external investigation has been completed.

5.5 Appeal Process & Mediation

Parties unsatisfied with the outcome may provide in writing grounds, additional details, or information to the HR Representative for consideration within 7 days of the decision. It is expected that employees will utilize the provisions of this policy to address their concerns.

5.6 Other Options or Alternative Complaint Procedures

This process does not prevent, nor discourage, any employee from filing a complaint or seeking expert assistance from:

- any applicable provincial Human Rights Commission or tribunal;
- any applicable provincial Workers' Compensation or Occupational Health & Safety;
- the police;
- any applicable legal system (civil or criminal);
- pursuing other statutory or contractual options; or
- any applicable union grievance procedure.

The grievance procedures, as per applicable collective bargaining agreements, are not intended to circumvent the complaint process. However, circumstances may arise whereby the grievance procedure may be invoked at the respective union's discretion.

5.7 False or Malicious Accusation

If a case is determined to be based on a malicious or false accusation, the complainant(s) may be subject to disciplinary action, up to, and including termination of employment.

5.8 Confidentiality

All reasonable steps will be taken to maintain confidentiality. Conifex will not disclose the identity of the complainant or alleged respondent, or the circumstances of the complaint, except whereby disclosure is necessary for the purposes of investigating or taking corrective action in relation to the complaint, or where such disclosure is required by law. Anyone involved in the complaint process including complainants, respondents and witnesses, will not disclose any information to anyone except as required for the conduct of Formal Investigation & Resolution Process and the designate(s) conducting the investigation. Breach of the confidentiality under this policy may lead to corrective action including progressive discipline up to and including termination.

5.9 Document Control: Investigation Report

Investigation reports will not be distributed other than to the accountable manager without the express permission of the Human Resources Manager. In the event that a copy is provided (paper or electronic) to anyone, parties involved must commit, in writing, to take all reasonable steps to prevent inadvertent disclosure.

A bottom line or summary report may be provided to:

- the complainant;
- the respondent;
- the complainant's representative in the local union, if authorized by complainant(s);
- the respondent's representative in the local union, if authorized by respondent(s); and
- other parties as required by law.

5.10 Retaliation Prohibited

Conifex views retaliation as an attempt to undermine both the spirit and the expressed purpose of this policy, and is in violation of the policy. If an employee engages in retaliatory behaviour, Conifex may impose disciplinary action, up to and including termination of employment.

Examples of retaliation might include, but are not limited to:

- discharge or suspension because of a good faith complaint as per the rights under this policy;
- unwarranted poor performance evaluations;
- change in duties or service opportunities because of reporting breaches under this policy;
- other negative employment decisions directly related to retaliation for participating in the process;

- breaches of confidentiality;
- gossiping about, laughing at, ignoring, or failing to take seriously reports/complaints under this policy; and
- continued or escalated prohibited behaviours under this policy.

6. Bullying & Harassment Definitions

6.1 Bullying

For the purposes of this policy, bullying and harassment are defined as any inappropriate or conduct or comment that a person knew or reasonably ought to have known would cause a worker to be humiliated, intimidated, but excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Bullying and harassment exclude any reasonable action taken by the employer or supervisor relating to the management and direction of workers or the place of employment.

An example of conduct not considered bullying and harassment is the exercising of management rights, by for example, making decisions related to job duties, workloads, deadlines, transfers, reorganizations, work instructions or feedback, work evaluation, performance management, and/or disciplinary actions.

6.2 Differentiation between Bullying & Harassment

There are some similarities between bullying and harassment, but they are differentiated by the fact that bullying is generally intentional behaviour where harassment is not always intentional and can take place unintentionally. Intent does not determine whether the behaviour is bullying and harassment. A person cannot excuse their behaviour by saying they did not intend it to be humiliating or intimidating. This policy differentiates between the two behaviours and covers several different types of harassment including workplace harassment, sexual harassment and criminal harassment. Any acts of bullying, harassment, discrimination and violence are all serious forms of misconduct that **will not be tolerated**. All complaints under this policy will be taken seriously and where it is determined that a breach of this policy has occurred, such breaches will be immediately and appropriately dealt with under the terms of this policy.

Tactics	Examples
Verbal Abuse	<ul style="list-style-type: none"> • Verbal aggression or insults calling someone derogatory names. • Repeated and on-going shouting yelling and/or directing profanity at another person. • Name calling or making jokes that are obviously offensive. • Insulting or putting down an employee, their personal life, their family or traits. • Spreading malicious gossip, rumours or sarcasm. • Ridicule and deliberate unfriendliness. • Threats to safety & physical wellbeing.
Behaviours/Actions	<ul style="list-style-type: none"> • Public or private behaviours from the bully towards the target such

	as: <ul style="list-style-type: none"> ○ vandalizing personal property; ○ threatening or intimidating gestures towards others; ○ humiliating others; ○ being hostile to others; ○ engaging in offensive or harmful initiation practices; and ○ being unappropriately cruel.
Abuse of Authority	<ul style="list-style-type: none"> ● Undeserved poor evaluations. ● Denial of advancement for non-legitimate reasons. ● Discounting or denying of employee successes. ● Stealing credit for the work of another employee. ● Tarnishing another person's reputation. ● Placing unreasonable job demands on others. ● Purposely applying inconsistency enforcement of rules with certain individuals.
Interference with Work Performance	<ul style="list-style-type: none"> ● Deliberately sabotaging or impeding the performance of work. ● Undermining another person's credibility. ● Purposely setting people up to fail. ● Incorrectly blaming others for errors that are not theirs.
Destruction of Workplace Relationships	<ul style="list-style-type: none"> ● Destroying workplace relationships between the target and: <ul style="list-style-type: none"> ○ co-workers; ○ bosses; ○ customers; and ○ suppliers. ● Ostracising, socially isolating, excluding, boycotting or disregarding an employee. ● Speaking negatively, maliciously gossiping or being judgmental towards an employee. ● Mobbing – The instigator of the bullying convinces others to join their campaign against an individual. A mob consists of ordinary workers who, after deeming an individual worker a threat, collectively attack the perceived enemy.

6.3 Sexual Harassment

Sexual harassment is specifically prohibited under this policy, and for the purposes of this policy is defined as, “unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature inappropriate in the work environment”.

Examples of sexual harassment might include, but are not limited to:

- demeaning, obscene and/or derogatory comments about a person's gender or sexual orientation;
- unnecessary physical contact including:
 - touching;
 - pinching;

- patting;
 - punching;
 - unnecessarily brushing up against someone;
 - blocking the movements of another person; and
 - physical assault
- staring or leering;
 - unwelcome sexual comments, innuendos, jokes or taunting about one's attire, body or marital status;
 - unwelcome inquiries or comments about a person's sex life or spreading rumours thereabout;
 - sexual horse-play or pranks of a sexual nature;
 - sexually explicit displays or distribution of pictures, materials, emails or objects in the workplace;
 - offering or implying a reward or threat about employment status or other terms or conditions of employment in exchange for sexual favours;
 - unwelcomed affectionate, flirtatious advances, sexual propositions, or obscene gestures;
 - obscene letters, phone calls, emails, or unwelcomed words or comments with sexual meaning;
 - unwelcomed repeated social contact;
 - non-consensual sexual contact; and
 - persistent, unwelcomed contact or attention at the end of a consensual relationship.

6.4 Consensual & Romantic Relationships

Consensual romantic or sexual relationships between co-workers can sometimes be problematic, for example a relationship between supervisors and a subordinate as the relationship can be vulnerable to exploitation. There is a power imbalance that can influence these relationships which may bring into question the voluntary and consensual aspect of the relationship. In such circumstances, these relationships need to be brought to the attention of Conifex to look at options to remove the direct reporting relationship to prevent any exploitation that may occur.

6.5 Workplace Discrimination

Discrimination takes place if, “an individual, or a group of individuals, have been singled out and treated adversely or differently than others due to group characteristics such as race, colour, ancestry, place of origin, religion, family status, marital status, physical disability, mental

disability, sex, sexual orientation, age, political beliefs, or criminal or summary conviction offence unrelated to employment.” Employees of Conifex will not participate in discriminatory activities based on these prohibited grounds as outlined by the Human Rights Legislation.

6.6 Criminal Harassment

Criminal harassment may involve the violation of Section 264 of the *Criminal Code* RSC 1985, c C-46 (the "**Criminal Code**"). Examples of criminal harassment might include, but are not limited to:

- repeatedly following from place to place the other person or anyone known to them;
- repeatedly communicating with, either directly or indirectly, the other person or anyone known to them;
- besetting or watching the dwelling-house, or place where the other person, or anyone known to them, resides, works, carries on business or happens to be; and
- engaging in threatening conduct directed at the other person or any member of their family.

Section 423 of the Criminal Code also prohibits, among other things, the use of violence or threats of violence and intimidation for the purpose of compelling another person to abstain from doing anything or to do anything that such person has a lawful right to do or abstain from doing.

The Criminal Code also defines a range of illegal activities which can occur in the workplace. Many forms of physical abuse are considered crimes. These include various forms of assault (Section 265), forcible confinement (Section 279), murder or attempted murder (Sections 229 and 232), or criminal negligence (Section 219).

7. Workplace Violence & Reporting

7.1 Internal & External Sources of Violence

This policy addresses both internal employee-to-employee violence and violence directed towards employees from outside of Conifex such as by the public. Threats of, or actual workplace violence will not be condoned or tolerated. All employees and subcontractors are required to notify Conifex of any violence incidents or acts that could lead to violence. The Incident Investigation Report is to be utilized to record and report hazards such as violence, an unsafe condition, an unsafe act or action being done.

The immediate supervisor or management will investigate all reports and at the completion of the investigation provide to the employee a written report with conclusions and recommendations. On completion of the investigation into the workplace violence, management will:

- keep a record of the report from the complainant;

- provide the workplace committee or the health and safety representative with the report of the competent person, providing information whose disclosure is not prohibited by law and that would not reveal the identity of persons involved without their consent; and
- adapt or implement controls to prevent a recurrence of the work place violence.

Examples of workplace violence might include, but are not limited to:

- exercising physical force by one person against another that causes or could cause physical injury;
- an attempt to exercise physical force against a worker that causes, or could cause physical injury;
- a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against a worker that causes or could cause physical injury; and
- threatening behavior, such as:
 - shaking one's fists towards another person;
 - throwing or destroying objects;
 - expressing, verbally or in writing, an intent to inflict harm;
 - any behaviour that demeans, embarrasses, humiliates, annoys, alarms or verbally abuses a person; and
 - swearing, insults, and condescending language.

7.2 Violence Investigating

The Human Resources Department will immediately investigate the violent act. As part of the investigation, the incident will be discussed with the aggressor. An investigation report will be filled out by the supervisor which will enter into the corresponding system. The situation may then be mediated and/or dealt with through the disciplinary policy according to the situation.

7.3 Reducing the Risk of Violence

An assessment of the potential for workplace violence has been carried out in the attempt to reduce the risk of violence. The results of the task assessment have resulted in changes or additions to the safety management system. The risk assessment must include the consideration of:

- previous experience in that workplace;
- occupational experience in similar workplaces, and
- the location and circumstances in which work will take place.

If a risk of injury to workers from violence is identified by an assessment, Conifex must establish procedures, policies and work environment arrangements to eliminate or minimize the risk to workers from violence.

Management will inform workers who may be exposed to the risk of violence from persons who have a history of violent behaviour and whom workers are likely to encounter during their work. Workers with a history of violence will be closely monitored and /or given work, which is less likely to be stressful.

8. Communication

As per Conifex's Safety Management System, and corporate communication strategy, all applicable policies and procedures are reviewed with all new employees prior to engaging in any work activities (during orientation) and annually every twelve months thereafter with existing and/or returning employees (refresher training). This is undertaken by utilizing Conifex's Learning Management System.

9. Definitions

Complainant: The person who is reporting an alleged breach of the Respectful Workplace Policy.

Bad Faith: For the purposes of this policy means making a complaint or allegation that is not true

Good Faith: For the purposes of this policy "good faith" means making a claim with good intentions that a violation has occurred under this policy

Respondent: The person alleged to have breached the provisions of the Respectful Workplace Policy and which may include staff, clients or a member of the public. If the Respondent is a client or member of the public, it is recognized that the Respondent's participation in any process pursuant to the policy and manual will be voluntary and cannot be mandated.

[Intentionally left blank.]

Acknowledgment – Respectful Workplace Policy

I acknowledge that I have read and understand the Respectful Workplace Policy and agree to participate and abide by the requirements of a respectful workplace that maintains the safety, dignity and equality for all.

Employee Name (Print)

Employee Signature

Date

Return to Human Resources

APPENDIX A
HR Investigation Questionnaire

This form is provided as a tool for conducting the investigation
It is not required that this form be used

HR Investigation Questionnaire		
EMPLOYEE (NAME & NUMBER):	DIVISION:	DATE OF HIRE:
POSITION:	SHIFT:	SUPERVISOR:
DAY OF ROTATION WHEN INCIDENT TOOK PLACE:	INCIDENT DATE/TIME:	REPORTED TO:
RECORDER:	DATE:	PRESENT:
WHAT HAPPENED: (DETAILED AS POSSIBLE)?		
WHO WAS INVOLVED (ANY WITNESS)?		
WHERE DID IT HAPPEN?		
WHEN DID IT HAPPEN?		
WHAT WERE THE FACTORS INVOLVED?		
POLICY VIOLATIONS (WHAT POLICIES AND/OR PROCEDURES WERE VIOLATED)?		
OTHER COMMENTS		
RECOMMENDATION OF OUTCOME AND NEXT STEPS?		

APPENDIX B
Respectful Workplace Complaint Form

This form is provided as a tool for conducting the investigation
It is not required that this form be used

Respectful Workplace Complaint Form	
Section A: General Information (Please Print Clearly)	
NAME:	CONTACT NUMBERS
JOB TITLE:	WORK: _____
DEPARTMENT:	HOME: _____
REPORTING TO:	OTHER: _____
DIVISION:	EMAIL: _____
	Special Contact Instructions: _____

Section B: Complaint Details	
TYPE OF OCCURRENCE(S) <input type="checkbox"/> VERBAL <input type="checkbox"/> NON-VERBAL <input type="checkbox"/> PHYSICAL	
WHERE DID THE OCCURRENCE(S) TAKE PLACE?	DATE AND APPROXIMATE TIME
WHAT ARE THE DETAILS OF THE OCCURENCE(S)? 	
WERE THERE ANY PHYCIAL INJURIES? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, PLEASE EXPLAIN 	
WAS FIRST AID REQUIRED? <input type="checkbox"/> YES <input type="checkbox"/> NO DID YOU CONSULT A HEALTH CARE PROVIDER <input type="checkbox"/> YES <input type="checkbox"/> NO IF SO, WHO PROVIDED MEDICAL CARE? 	
WERE THE POLICE CALLED? <input type="checkbox"/> YES <input type="checkbox"/> NO 	
NAMES OF INDIVIDUAL (S) ENGAGING IN THE UNACCEPTABLE BEHAVIOUR? 	

Respectful Workplace Complaint Form

Section B: Complaint Details, continued

DID ANYONE WITNESS THIS OCCURRENCE? ☐ YES ☐ NO
 IF SO, PLEASE PROVIDE DETAILS INCLUDING NAMES AND CONTACT NUMBERS

DID YOU TELL ANYONE ABOUT YOUR EXPERIENCE? ☐ YES ☐ NO
 IF SO, PLEASE PROVIDE DETAILS

DID YOU TAKE ANY STEPS TO ADDRESS OR RESOLVE THIS SITUATION?
☐ YES ☐ NO
 IF SO, PLEASE PROVIDE DETAILS

WHAT WOULD YOU LIKE TO SEE HAPPEN? WHAT WOULD HELP YOU?

PLEASE PROVIDE ANY DETAILS CONCERNING PRECEDING RELATED EVENTS E.G.,
 A PREVIOUS OCCURRENCE INVOLVING YOURSELF OR OTHERS, CONTRIBUTING
 FACTORS ETC.

ADDITIONAL INFORMATION AND/OR COMMENTS. (ATTACH SEPARATE SHEET (S) IF
 NECESSARY)

SIGNATURE OF THE PERSON MAKING
 THE REPORT:

DATE:

PRINTED NAME:

APPENDIX C
Withdrawal of Complaint Form

I hereby withdraw my formal Respectful Workplace complaint dated _____.

Signature: _____

Employee Printed Name: _____

Date: _____

Time: _____

APPENDIX D

Process Flowchart

