

# Employees and Culture Policy

## Respect, civility and prevention of harassment and violence in the workplace

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### Respect, civility and prevention of harassment and violence in the workplace

#### 1. POSITIONING AND COMMITMENT

Energir recognizes the importance of providing all its employees and business partners (consultants, suppliers, visitors and customers) with a working and sharing environment, as well as a climate based on healthy, respectful and civic-minded relationships and interactions.

The Policy on Civility and the Prevention Harassment and Violence in the Workplace demonstrates Energir's commitment to promoting a work environment that prohibits all forms of harassment, violence, incivility or any conduct that could give rise to such behavior, and to protecting the dignity and physical and psychological integrity of its employees.

To this end, Energir undertakes to disseminate, promote and apply this policy to its employees, with the aim of supporting the mechanisms for handling complaints and reports of this nature brought to the employer's attention. The company undertakes to provide the necessary support to persons presumed to be victims of harassment, violence and incivility, to protect complainants and witnesses against any prejudice or reprisals, and to guarantee the confidentiality of information concerning them. In addition, Energir offers psychological assistance through its psychological support services (employee and family assistance program, self-help network), both for alleged victims and for witnesses and respondents. Lastly, this policy is designed to ensure that the information provided is used only to process the complaint and report brought to the employer's attention and/or to impose disciplinary or administrative measures, where appropriate.

This policy is part of a rapid and effective problem-solving approach aimed at restoring a healthy and harmonious working environment as quickly as possible.

#### 2. SCOPE

This policy applies to all Energir employees and members of management, as well as to anyone having a business relationship with Energir. This includes customers, consultants, administrators and suppliers of goods and services. It covers behaviour that may constitute harassment, violence or incivility in the workplace towards any member of the company's staff or management, in the course of or in connection with their work or the performance of their duties. Any form of inappropriate conduct that may lead to harassment, violence, incivility or a deteriorating work environment will not be tolerated.

The policy applies in the context of work or any other job-related activity, including, but not limited to, travel, conferences, meetings and work-related social activities. It applies both inside and outside the company or establishment (including teleworking locations). In addition, this policy also covers communications transmitted or received by any means, technological or otherwise, in a work context (including social networks, e-mails, text messages, posters and letters)

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#### 3. DEFINITIONS

**Respect:** Respect means recognizing the inherent dignity and worth of every person. Respect is linked to empathy, integrity and concern for the consequences of our actions on others. For example:

- Respect others' living space;
- Respect the confidentiality of information received;
- Giving constructive feedback directly to the person concerned with a respectful attitude; and
- Give others a chance to express themselves.

**Civility:** Civility is a set of implicit or explicit norms that govern behaviors conducive to harmonious and productive relationships. This includes behaviors such as politeness, courtesy and collaboration. It maintains a positive work climate and avoids interpersonal conflict. For example:

- Notify us if you expect to be late for a meeting.
- Clean and tidy equipment and common areas after use; and
- Inform the other person if you need to interrupt the call to receive an urgent message or consult your computer.

**Incivility:** Conversely, incivility is behavior that does not respect some or all of the rules of community life, such as respect for others, politeness or courtesy. For example:

- Deliberately refusing to salute;
- Sigh as a colleague speaks;
- Giving a colleague an inappropriate nickname;
- Fueling rumors;
- Making remarks about physical characteristics, gender, sexual orientation, ethnic origin or religious beliefs; and
- Maliciously using technology, such as social networks or communication platforms, to make inappropriate, offensive or harmful comments." Psychological harassment" / "Sexual harassment" / "Discriminatory harassment"

Harassment takes many forms, and this policy does not attempt to define them all.

In general terms, **psychological harassment** is defined as vexatious behaviour in the form of repeated, hostile or unwanted conduct, verbal comments, actions or gestures that undermine a person's dignity or psychological or physical integrity and result in a harmful work environment. Conduct may constitute workplace harassment, whether intentional or unintentional. Workplace harassment may include reprisals or threats of reprisals.

For greater clarity, psychological harassment manifested by words, acts or gestures of a sexual nature is also referred to as "**sexual harassment**". This policy also prohibits any form of **discriminatory harassment**, i.e. harassment based on a prohibited ground of discrimination within the meaning of the Charter of Human Rights and Freedoms, i.e. sex, race, color, pregnancy, sexual orientation, civil status, age, religion, political convictions, language, ethnic or national origin, social condition, and handicap or the use of a means to

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palliate a handicap.

Harassment in the workplace can take the form of the following behaviours:

- Innuendo, inappropriate jokes or comments, insults or other gestures that undermine a person's dignity or physical or psychological integrity;
- Engaging in behavior of a sexual nature, including unwelcome physical contact, insistent or inappropriate looks, presentation of sexually explicit images or other material, boasts about sexual prowess or questions or discussions about sexual activities, crude or offensive jokes or comments of a sexual nature, and requests for dates or sexual favors;
- Threats, intimidation, retaliation or degrading, offensive or humiliating comments;
- Isolate a person, spread rumors about them, use derogatory, disparaging or unwanted nicknames, make false allegations of incompetence against them or undermine their credibility; and
- Engage in threatening behaviour, such as swinging a fist, destroying property or throwing objects, or using physical force against someone, such as hitting, shoving or kicking.

A single act of serious conduct may constitute harassment if it causes such harm and has a continuing harmful effect on the individual.

Harassment may exist without the intention of the person accused of the inappropriate behavior.

It is generally recognized that certain behaviours **do not constitute psychological harassment** in the workplace:

- Reasonable exercise of the employer's management rights, such as work organization, task allocation, disciplinary measures, termination of employment and layoffs;
- The normal and routine assessment of work performance, the routine management of absences or staff discipline; and
- The expression of disagreement or a reasonable, albeit divergent, opinion, and interpersonal conflict.

In this policy, the term "**harassment**" used alone refers to psychological harassment, sexual harassment and discriminatory harassment.

#### "Violence in the Workplace:

Workplace violence is defined as an attempted assault, an actual assault, or threatening words or behavior directed at a target that gives the target reasonable cause to believe that he or she is likely to suffer harm (physical or psychological).

Violence in the workplace can manifest itself in the following forms:

- The use of physical force by one person against another that injures or could injure the Energir employee;
- Physical control or containment;
- Dangerous or threatening pushing and shoving;

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- Flagrant or intentional disregard for the safety or well-being of others;
- An attempt to use physical force against a person that could result in physical injury;
- A statement or behavior that a person may reasonably interpret as a threat to use physical force against him or her that could result in physical injury.

A situation that constitutes harassment in the workplace may involve one or more forms of violence.

#### 4. RESPONSIBILITIES

The various responsibilities of Energir's executives, managers and other personnel are determined by the principle that harassment, violence and incivility in the workplace are prohibited and must not be tolerated. Furthermore, any form of inappropriate conduct that could potentially give rise to harassment, violence, incivility or undermine the climate will not be tolerated. However, it is everyone's responsibility to ensure compliance with this policy, and to maintain and promote a respectful workplace, free from harassment, violence and incivility. Specific roles and responsibilities are detailed below:

##### 4.1 Management

- Take all reasonable steps to disseminate, promote and train staff with the aim of maintaining a respectful working environment, free from all forms of harassment, violence, incivility or unhealthy atmosphere;
- Prevent such situations from arising by educating managerial staff.
- When such conduct is brought to its attention, Management will take all the means at its disposal to put a stop to it, if necessary.

##### 4.2 Managers

- Promote civility by encouraging respect, cooperation, politeness, courtesy and good manners;
- Promote a respectful workplace, free from harassment, violence and incivility by setting an example through their attitude and behavior, ensuring that the policy is known by everyone working or performing duties within the company;
- To apply and enforce this policy in order to ensure, as far as possible, that working relationships within the company are respectful and free from any form of incivility, violence or harassment;
- Discuss the importance of maintaining a healthy climate in your team meetings, in order to promote prevention in your team;
- Upon receipt of a complaint or when such a situation is brought to his or her attention, the manager must take the situation seriously and act promptly to conduct a thorough investigation, if necessary, to determine the facts; and
- Protect any member of our staff who is alleged to be a victim of harassment, violence or incivility by supporting the recourse procedure and offering any assistance mechanisms and resources available to staff.

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#### 4.3 All staff members

- Promote a respectful work environment, free from harassment, violence and incivility by fostering a healthy climate, adopting standards of conduct aimed at the application and respect of this policy, in particular all staff members have a responsibility to conduct themselves in a respectful manner, free from all forms of harassment, violence and incivility, towards anyone;
- Do not tolerate disrespect, incivility, violence or harassment in the workplace;
- Provide full cooperation during an investigation and respect the confidentiality of complaints and the investigation process; and
- Report any harassment, violence, incivility or unwanted behavior in the workplace.

#### 5. RECOMMENDATIONS FOR CONDUCT AT WORK-RELATED SOCIAL EVENTS

Staff members must continue to behave in a professional and respectful manner and comply with this policy at work-related social events, whether or not these take place outside the usual workplace.

Energir therefore recommends that staff members observe the following guidelines in particular:

- Refrain from aggressive, intimidating or violent behavior, such as destroying property, invading participants' personal space or shouting;
- When alcohol is permitted, consume in moderation;
- Do not use cannabis or other drugs;
- Ensure that everyone is able to participate in conversations and activities;
- Do not engage in any behavior of a sexual nature, such as sharing sexually explicit material, making sexual advances or propositions, or engaging in unnecessary or unwanted physical contact;
- Do not make derogatory, degrading, sexual or discriminatory jokes or comments, e.g. mocking an individual characteristic such as race, religion, sex, disability, sexual orientation, gender identity, etc;
- When taking photos or videos during an activity, avoid posting embarrassing or inappropriate photos or videos on social networks or otherwise, or without the consent of the people concerned.

Energir reserves the right to expel a staff member from a social event and/or prohibit that person from participating in a future event if that person does not comply with this policy.

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#### 6. METHODS AND TECHNIQUES FOR IDENTIFYING, CONTROLLING AND ELIMINATING RISKS OF HARASSMENT AND VIOLENCE

Energir is committed to taking reasonable steps to provide a work environment free from all forms of harassment and violence in order to protect the dignity as well as the psychological and physical integrity of individuals. In particular, Energir uses the following methods and techniques to identify, control and eliminate risks of harassment and violence.

##### 6.1 Identifying risks

- In accordance with occupational health and safety obligations, conduct a workplace assessment to identify psychosocial risks, including the risk of harassment and violence in the workplace;
- Hold individual meetings with staff members to discuss their expectations;
- Hold meetings with departing staff to find out why they are leaving;
- Maintain a confidential register of de-identified complaints and/or reports and analyze them to identify risk factors;
- Carry out occasional work climate surveys as needed.

##### 6.2 Risk control

- Pay particular attention to tensions and conflicts between people, including third parties who interact with staff;
- Publicize this policy, review it regularly and update it as required;
- Disseminate this policy in such a way as to make it accessible to all staff, through CASA and through mandatory training for managers and employees.
- Promote collaboration in the workplace and open communication between management and staff, as well as between staff members;
- Provide adequate support and coaching for staff;
- Quickly clarify expectations and misunderstandings, and promptly manage any conflicts that may arise;
- Clearly define the roles and tasks of each person;
- Train and educate all staff, including new hires, on this policy and on respect and civility in the workplace;
- Follow up with people who have reported a problematic situation or made a report or complaint;
- Issue regular reminders to staff and managers regarding this policy and the measures in place;
- Use diversified and appropriate communication strategies to remind employees of behaviors that are not tolerated and/or encouraged in the workplace;
- Ensure that this policy is properly applied and understood, and that it achieves its objectives of preventing harassment and dealing with harassment situations.

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#### 6.3 Risk elimination

- Consult staff members and receive their suggestions for the most appropriate solutions to risks;
- Inform employees of the resources available to support them in the event of difficulties: Employee and Family Assistance Program, Energir support networks, Health and Wellness Office.
- Raise awareness among staff and third parties who interact with staff, such as suppliers and customers, of the importance of respect and civility in the workplace, as well as zero tolerance for any form of harassment or violence, including inappropriate sexual or discriminatory language and behavior;
- Make employees aware of behaviors to avoid that may constitute sexual harassment, as defined in this policy;
- Provide training and information on harassment prevention and on this policy and its amendments;
- Offer training to management staff on how to intervene in situations of conflict, incivility and/or harassment;
- Treat every complaint or report seriously and promptly and, when required, conduct a respectful and thorough investigation within a reasonable timeframe;
- Impose appropriate measures on anyone who contravenes this policy;
- If necessary, call on specialized health and safety, investigative or psychological resources.

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#### 7. TRAINING PROGRAMS

Energir offers the following training to its employees:

- Ethics in action (in the learning portal);
- Prevention of harassment, workplace violence and domestic violence.

Energir also offers training and information following a substantial modification of the present policy or when the situation in a workplace requires it.

In addition to the above training, those designated to handle a complaint or report receive training on handling complaints and reports of psychological harassment, including sexual and discriminatory harassment.

#### 8. INCIVILITY ASSISTANCE AND RETURN MECHANISM

If you feel you have been the victim of incivility, you can first contact the person concerned to inform them of the undesirable behaviour and its harmful effects, and remind them of Energir's code of ethics.

- If the behavior doesn't change, consider whether it would be appropriate to talk to the person a second time. If it persists, or if conditions are not conducive to this second discussion, the person should contact his or her manager (or another intervener).
- The manager must meet with the person behaving inappropriately to validate his or her version of events, emphasize the importance of civility and remind him or her of the code of conduct. Clarify expectations and explain possible consequences if the behavior continues.
- Depending on the situation and the openness of the people involved, the manager can then invite the complaining employee and facilitate dialogue between the two people so that they can come to a direct agreement.
- The manager follows up to ensure that the situation is resolved. If not, the manager must take the necessary steps to stop the behavior before the situation deteriorates.
- Anyone claiming to be a victim of incivility can contact the Business Partners (PARH) of the Employees and Culture sector to discuss the situation and obtain information on the appropriate steps to take.

#### 9. DEALING WITH HARASSMENT AND VIOLENCE IN THE WORKPLACE

##### 9.1 Persons designated to deal with situations of harassment and violence

The persons with the following titles are designated by Energir to receive and handle complaints and reports and to receive any information or documents relating to a possible breach of this policy (hereinafter the "**Designated Person**" or the "**Designated Persons**"):

- Human resources business partner
- Director of Labor Relations Consulting

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- Executive Human Resources Manager

*See Appendix 1 for details*

A confidential and anonymous ethics line is also available if the complainant prefers to report the situation in one of the following ways:

- by phone at 1 844 264-6268 (toll-free number dedicated to Energir);
- online on their secure website  
<https://app.alias-solution.com/contact/fr/energir>;
- by post to the confidential ALIAS mailbox  
CP 47022 SUCC Saint-Jean, Lévis, Québec, G6Z 2L3.

If the complaint or report reveals actions or behaviours that may constitute a violation of this policy, discrimination, violence or misconduct, ALIAS will communicate the information to the Executive Director, Internal Audit, the Executive Director, Human Resources, the Executive Director, Corporate Affairs, Governance, Ethics and Corporate Secretariat, and the Designated Person, as necessary to deal with the complaint or report, including the holding of an investigation and the implementation of other appropriate measures. In certain cases, they may determine that the services of an external investigation firm are required to handle the complaint or report.

Anyone claiming to be a victim of harassment or violence can contact the Business Partners (PARH) of the Employees and Culture sector to discuss the situation and obtain information on the appropriate steps to take.

### 9.2 Informal process

- 9.2.1** Any person who believes he or she has been the victim of harassment or violence must, if circumstances permit, inform the person concerned that such behavior is unwanted and likely to harm his or her psychological or physical integrity, or that it is likely to create a harmful working environment for him or her. She must ask the person concerned to put an end to the behavior.
- 9.2.2** If this intervention fails to resolve the problem, or if the person is unable to raise the matter directly with the person concerned, the person who believes he or she is a victim of harassment must report the situation to a Designated Person, either verbally or in writing. If the issue is directly or indirectly related to the Designated Person, the person who believes he or she is a victim of harassment or violence may report the matter verbally or in writing to any other person in authority at Energir, who will forward the report in accordance with this policy.
- 9.2.3** If circumstances permit, and at any time thereafter, the Designated Person may organize an informal conciliation or mediation meeting with the complainant and respondent, during which discussions are supervised and facilitated by the Designated Person. The aim is to help them find solutions and reach an amicable settlement.
- 9.2.4** The Designated Person will inform the person complaining of harassment, violence or an

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unhealthy climate of the support measures available at Energir or in the community (e.g. Assistance Program, C.L.S.C., Peer Support Network, etc.).

- 9.2.5** When an informal approach is taken, this first step suspends the limitation period for filing a complaint until such time as we can see if the approach is successful. If the complainant subsequently takes a formal step, the limitation period starts again on the same date.

#### 9.3 Filing a complaint

- 9.3.1** If the informal and assistance mechanism described above is not appropriate to the circumstances or has not produced the desired result, a formal complaint may be made in accordance with the following procedures within two (2) years of the last occurrence of the conduct complained of.

- 9.3.2** The complainant must complete a declaration form and a confidentiality form with the Designated Person. This form must include a brief description of the behaviour complained of, specifying in particular the dates, times and circumstances of the behaviour in question, as well as the name of any person involved or witnessing the behaviour, if applicable. The complaint must be dated and signed by the complainant, and submitted to the Designated Person.

- 9.3.3** Upon receipt of the complaint, the Designated Person shall :

- Examine the complaint;
- Consult or meet with the complainant;
- Conduct an admissibility analysis and determine within a reasonable timeframe whether the allegations would prima facie constitute harassment or violence, or whether they need to be clarified;
- If necessary, inform the complainant that his or her complaint is inadmissible if the allegations do not constitute harassment or violence;
- If the complaint is admissible, notify the respondent of the complaint and ask him or her to give his or her version of events;
- Determine whether any preventive measures need to be taken during the subsequent stages to ensure that any harassment, violence and/or a healthy climate cease;

These steps may be carried out by an external resource mandated by Energir when deemed appropriate by the employer. The Designated Person or the person mandated by Energir makes or obtains a written summary of the statements made by the complainant and the respondent.

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#### 9.4 Reporting

- 9.4.1** The Designated Person may receive reports from people who have witnessed situations perceived as harassment, violence or at risk of becoming such.
- 9.4.2** Reports may be communicated to the Designated Person verbally or in writing, by e-mail or other means of communication.
- 9.4.3** Upon receipt of an alert, the Designated Person may then initiate any form of verification or investigation deemed appropriate in the circumstances.
- 9.4.4** A confidential and anonymous hotline is also available to any employee wishing to report a breach of this Policy. All information can be found above in the policy.

#### 9.5 Transmission of a document or information

Any person, including a complainant or respondent, who is in possession of a document or information relating to a possible breach of this Policy may forward it to the Designated Person by e-mail or other means of communication. The Designated Person will acknowledge receipt and, if necessary, inform the person of the action to be taken.

#### 9.6 Survey

- 9.6.1** The Designated Person must proceed with the investigation as quickly as possible, given the circumstances. The complainant must cooperate with the investigation and report all facts accurately and truthfully. If the complaint concerns, in whole or in part, the complainant's manager, he or she will be replaced by the manager at the next higher level.
- 9.6.2** The person conducting the survey can:
  - Meet with the complainant and respondent to get their side of the story;
  - Meet with people identified as witnesses, on the understanding that not all need to be met, at the discretion of the person carrying out the investigation;
  - Obtain written and signed statements from parties and witnesses;
  - Obtain and analyze relevant documents from parties or witnesses;
  - Prepare an investigation report including a summary of the allegations, an analysis of the evidence obtained and, if mandated, a conclusion as to whether the complaint, in whole or in part, is founded or unfounded.
- 9.6.3** All staff members interviewed for investigative purposes have an obligation to cooperate and to convey the facts accurately and truthfully.
- 9.6.4** It is understood that Energir, through its managers, intends to impose, depending on the circumstances surrounding the violation of this policy and the seriousness of the behaviour observed, any administrative and/or disciplinary measures deemed appropriate, up to and including dismissal, in accordance with the disciplinary rules currently in force. Energir may

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also impose, in the course of an investigation, any interim and supervisory measures deemed necessary to protect the rights of the persons concerned.

- 9.6.5** In certain cases, the Designated Person may choose to use the services of an external investigation firm to conduct the investigation, which would be subject to the same obligations as an internal investigator. If a member of senior management is involved, the file and investigation report will be forwarded to the President, the Vice-President Employees and Culture and the Chairman of the Governance, Ethics and Environment Committee.
- 9.6.6** If a member of the Employees & Culture sector wishes to lodge a complaint and is not comfortable sharing this information with a colleague in his or her sector, and/or if the person in question is also a member of this sector, he or she may lodge the complaint directly with the Legal Affairs department, the Internal Audit department and the Corporate Secretariat department, as well as via the confidential ethics line. In such circumstances, the investigation process may be entrusted to a firm specializing in the field.
- 9.6.7** The measures indicated above and the investigation procedure conducted under the terms of this policy are intended to be flexible in order to respond to the specific circumstances of each situation. Energir reserves the right to use a different procedure or measures if deemed appropriate in a given situation.

## 10. PROTECTIVE MEASURES

Any person who files a complaint in good faith, transmits a document or information or participates in an investigation is protected against any form of reprisal. Any retaliatory action is prohibited, is in itself a violation of this policy and may be subject to disciplinary or administrative action.

On the other hand, a complaint deemed frivolous, i.e. lodged in bad faith, will be considered a violation of this policy. Depending on the seriousness of the charges, the person concerned may be subject to administrative or disciplinary measures.

## 11. CONFIDENTIALITY AND RETENTION

All information and documents relating to a complaint, as well as the identity of the persons involved, will be treated as confidential, unless disclosure of such information is required by law or for the proper handling of a complaint, the conduct of an investigation or the imposition of disciplinary or administrative measures. In such cases, the parties concerned will be informed.

Energir does not use or disclose the contents of any complaint, report, information or document received, except to the extent necessary to comply with the law or the terms of this policy. This information is kept in a secure location, either in a locked space or in a secure, non-accessible computer file.

When an investigation is in progress, the complainant, respondent and witnesses must not discuss the complaint, report or investigation with each other or with other staff members or witnesses. Any person must sign an undertaking of confidentiality prohibiting disclosure of the details of a complaint, report or investigation.

All documents made or obtained in the course of dealing with a situation of harassment are kept for a period of three (3) years or according to the ethical obligations of the designated person, after which they are destroyed.

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#### **12. OTHER POLICIES**

This policy shall, at all times, be read and interpreted in conjunction with all policies in effect within Energir.

*Energir reserves the right to make changes to this policy in order to respond as adequately as possible to its changing needs.*

*If you require further information about this policy, please contact one of our Designated Persons.*

#### **13. REVIEW**

This policy is subject to review at least every two years.

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#### APPENDIX

##### 1. List of persons designated to deal with situations of harassment and violence

The following persons are designated by Energir to receive and handle complaints and reports and to receive any information or documents relating to a possible breach of this policy (hereinafter the "**Designated Person**" or "**Designated Persons**"):

- Cynthia Caron, Human Resources Business Partner
- Chloé Jalbert, Human Resources Business Partner
- Isabelle Maris, Human Resources Business Partner
- Catherine Morel, Human Resources Business Partner
- Julie Primeau, Human Resources Business Partner
- Cindy Roy, Human Resources Business Partner
- Éline Martel, Director of Labour Relations Consulting
- Véronique Desjardins, Executive Director, Human Resources

The list of Designated Persons may be amended from time to time by the Vice President, Employees and Culture, without requiring the approval of Energir's Board of Directors.