

# Violence, Harassment and Discrimination have no place here.

The physical and psychological safety of our employees and the people we interact with is more important than anything else we do.

Unlike other areas of our business where we encourage learning through mistakes and failure, mistakes and failure to adhere to our Code of Conduct and this policy will not be tolerated.

We do want each other to learn. We have frequent team discussions about how we can be more inclusive and give advantages to people who do not have the same privilege as many of us do. We study this document and we learn from each other's lived experiences. However, if your learning experiences need to come at the expense of other people's safety, inclusion, or feelings of self worth, you are not welcome at Planswell.

## Application

All employees, contractors and board members must sign this policy to join our team. No matter where we are, who we are or what role we play, we represent the face of Planswell. We are personally accountable for enforcing the policies in this document, and must make every effort to prevent unethical behaviour and to intervene immediately if we observe a problem or if a problem is reported to us.

Anyone using our service as a user or client must also agree to these terms.

This policy applies to all activities while on Planswell's premises or while at other locations where an employee may be located as a result of their employment, or while they are engaging in Planswell's business, activities or social events. Everyone at Planswell is responsible for complying with this policy and working together to prevent workplace violence, harassment and discrimination. Failure to comply with this policy may lead to disciplinary action, up to and including termination of a contract for service or termination of employment for cause.

## Non-discrimination commitment

We provide equal treatment to everyone at Planswell and do not illegally discriminate on the basis of age, sex, race, colour, sexual orientation, religion, creed, political belief, record of offences, place of origin, ancestry, ethnic origin, citizenship, marital status, family status, gender identity, gender expression, disability, or any other ground protected by law.

## What not to do

The following behaviours will not be tolerated at Planswell:

### Workplace violence

The Occupational Health and Safety Act ("OHSA") defines workplace violence as:

- The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or

- A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker

## Workplace harassment

Harassment is defined as “*engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.*” This is similar to the definition of workplace harassment found under the OHSA.

Under the Code, every person has the right to freedom from harassment in the workplace because of race, sex, sexual orientation, gender identity, gender expression, sexual identification, ancestry, place of origin, color, ethnic origin, citizenship, creed, age, record of offenses, marital status, family status, or disability.

This includes **workplace sexual harassment**, which is defined by the OHSA as:

- Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome

## Examples of workplace harassment include but are not limited to:

- Derogatory or inappropriate comments, teasing, jokes, innuendoes or taunting;
- Display or circulation of any inappropriate, derogatory or offensive materials;
- Creation of an unpleasant, intimidating or intolerable environment through a pattern of offensive, threatening or hostile comments or conduct;
- Bullying or intimidation of any kind;
- Verbal abuse or inappropriate physical contact;
- Refusing to communicate, converse or work with an individual;
- Sexual assault/abuse;
- Suggestive looks, leering, staring or gestures;
- Unwelcome and unsolicited sexual advances;
- Reprisal or threat of reprisal for the rejection of a sexual advance or solicitation;
- Reprisal or threat of reprisal against an individual for having invoked this policy or participated in any investigation under this policy

This policy is not intended to limit or constrain the reasonable exercise of management functions in the workplace. Reasonable action taken by any manager at Planswell relating to the management and direction of employees or the workplace (e.g. counselling on attendance or work performance issues, performance evaluation, conflict management, discipline) is not workplace harassment.

## Your commitment

All Planswell workers must work in compliance with this policy, and be dedicated to preventing workplace violence, harassment and discrimination. All employees are expected to raise concerns, report any incidents or threats and intervene immediately if they observe a problem or if a problem is reported to them.

All workers have the right to report any occurrence of harassment or discrimination, or incident or threat of violence. There will be no negative consequences for complaints of violence, harassment or discrimination made in good faith. Retaliation against an employee reporting a situation in good faith and/or participating in an investigation will not be tolerated and any retaliatory conduct should be reported immediately to any member of our leadership team or board of directors.

## Training & education

Planswell will provide information, resources and mandatory training to all new and existing employees and people managers. Training will cover this policy and the supporting program. All workers will be provided with information and instruction on the contents of Planswell's policy and program with respect to workplace violence, harassment and discrimination.

## If something happens

If a violent incident occurs, the affected employee must remove themselves from the situation (if possible). The first priority is to ensure the workplace is safe, and then to notify relevant internal and external authorities, including calling the police (911) if necessary.

If you feel that you have been harassed or discriminated against, or if you witness any prohibited behaviour at work, here are the steps to take:

1. **Speak up:** If you feel comfortable doing so, tell the person engaging in the unwelcome conduct to stop.
2. **Report it:** Tell your manager or any member of the leadership team or board of directors what happened immediately, either verbally or in writing. If you do not feel comfortable reporting a breach of the Code through the traditional route, or feel like your report was not handled appropriately, please use an anonymous email account and submit a report to conduct [at] planswell [dot] com and your report will be reviewed by the leadership team.
  - a) When reporting, you may be asked to provide the following information:
    - i) Name of the person who has allegedly experienced workplace violence, harassment or discrimination, and their contact information
    - ii) Name(s), position(s), and contact information (if known) of the persons involved in the incident

- iii) Names of the witness(es), if any, or other person(s) with relevant information to provide about the incident and their contact information (if known)
- iv) Details of what happened including date(s), frequency and location(s) of the alleged incident(s)
- v) Any supporting documents or pieces of evidence that are relevant to the complaint

If you're a manager or supervisor who sees or hears about an incident, you must report it to our leadership team or board of directors right away.

When a complaint is received, the company will conduct a full and fair investigation. We will determine what remedy, if any, is appropriate, and keep all affected individuals informed about what's happening. At no time are you to take matters into your own hands, either by spreading rumors or seeking retribution.

## How we will investigate

If the allegations constitute a violation of this policy, they will be investigated. Planswell will, in its discretion, assign the investigation to an appropriate internal or external person to investigate.

Planswell pledges to investigate and deal with all incidents and complaints of workplace violence, harassment, and discrimination in accordance with the following process.

## The process

The formality and scope of the investigation will be determined by the specific circumstances of each complaint. At minimum, the following will take place:

1. The investigator will interview the complainant, and if the respondent is an employee, the respondent. The investigator will also interview any relevant witnesses identified by Planswell, the complainant, or the respondent.
2. The investigator must collect and review any relevant documents, and must take appropriate notes and statements during all interviews.
3. The respondent must be given the opportunity to respond to specific allegations raised by the complainant. In appropriate circumstances, the complainant should be given a reasonable opportunity to reply.
4. The investigator must prepare a written report that includes the following:
  - A summary of the allegations of the complainant
  - The steps taken during the investigation
  - The response from the respondent
  - Details about the evidence gathered and reviewed
  - Conclusion about whether workplace violence, harassment or discrimination was founded or not

During an investigation, the complainant and/or the respondent may be temporarily reassigned, or reporting relationships may be modified as an interim measure. In some cases, if deemed necessary, the respondent may be placed on a personal leave with or without pay for the duration of the investigation.



## The results

Once the investigation is completed, the complainant and the respondent will be informed via a written summary of the results of the investigation and any corrective action taken, or that will be taken, by Planswell to address workplace violence, harassment and discrimination.

Should the investigation conclude that the respondent has engaged in workplace violence, harassment and/or discrimination, Planswell will determine what corrective action, if any, are appropriate based on the severity and frequency of the misconduct. Disciplinary measures may include, but are not limited to, a verbal or written reprimand, suspension with or without pay, or immediate termination of employment, which may include termination for cause.

## Confidentiality

Information about investigations shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace violence, harassment and/or discrimination, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is ongoing, the complainant, the respondent and any witnesses should not discuss the incident, complaint or the investigation with each other or other workers or witnesses, unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

## No Reprisals

Planswell will not tolerate reprisals against an employee who, in good faith, raises a complaint of workplace violence, harassment or discrimination within the meaning of this policy. These protections also apply to anyone who cooperates in the investigation of a complaint.