

GLOBAL HARASSMENT AND VIOLENCE STANDARD

1. Mission Statement

Boroo is committed to providing safe workplaces for its workforce, free from harassment and violence. Boroo considers harassment and violence to be unacceptable behaviour in the workplace and will not tolerate this behavior under any circumstances. In implementing this Standard, Boroo affirms its commitment to:

- Taking reasonable precautions to prevent workplace harassment and violence;
- Upholding the rights of all people in the workplace to a safe working environment free from workplace harassment and violence;
- Promoting respect amongst all people in the workplace; and
- Encouraging fair and equitable treatment of people in the workplace.

2. Purpose

The purpose of this Standard is to define workplace harassment and violence, establish and detail the responsibilities of all persons in Boroo's workplace(s) to maintain a workplace free from harassment and violence, and ensure that incidents of workplace harassment and violence are investigated in a timely and equitable manner.

The Standard is intended to supplement and not supplant applicable local laws and applies in tandem with any procedure in effect in a country or site.

3. Scope

This Standard applies to all Boroo employees (indefinite term and definite term) during the course of work performed for Boroo.

In this Standard "workplace" means any place where employees are engaged in activities related to Boroo's work including, but not limited to, sites, offices, Boroo vehicles, third-party facilities and offsite locations where employees meet for business or Boroo social functions.

This Standard applies to all interactions between those performing work on behalf of Boroo, including electronic communications and interactions through various platforms, including but not limited to communications over handheld devices, via e-mail, or through social media applications.

In this Standard "third party" means a supplier, contractor, sub-contractor or agent who provides and receives payment for services or goods related to work performed in connection with any aspect of a Boroo operation (including office and sites).

4. What is Harassment?

In this Standard, the term "harassment" means any form of behaviour, when committed by a Boroo employee or a third party, that is not welcome and which offends, humiliates or intimidates a person and includes sexual harassment and workplace violence.

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

- Intimidating or offensive jokes or innuendos;

- Displaying or circulating offensive pictures or materials;
- Offensive or intimidating telephone calls and/or emails;
- Bullying (including physical, social and cyber-bullying);
- Unwelcome or unwanted verbal or non-verbal conduct, including physical or verbal assaults, threats, coercion and intimidation; and
- Knowingly downloading, transmitting, copying, distributing, retrieving, or displaying derogatory, discriminatory, threatening or obscene material generated from or shown on a Boroo system (including but not limited to; desktop computer, laptop, Blackberry/ Smartphone), or using Boroo's email system.

Conduct constituting workplace harassment may be, but does not have to be, based on an individual's race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status, disability, or as otherwise described in Boroo's *Human Rights Policy*.

Although workplace harassment usually refers to a course of repeated conduct, a single serious incident of such behaviour that has a lasting harmful effect on an employee may also constitute harassment.

The following conduct DOES NOT constitute workplace harassment:

- The normal and reasonable exercise of supervisory and management rights and responsibilities including, but not limited to, job assignments, working hours, performance feedback and reviews, work evaluations and disciplinary action;
- Differences of opinion;
- Minor disagreements between an employee and another person; and
- Isolated incidents of rudeness.

5. What is Sexual Harassment?

Sexual harassment is a form of workplace harassment, committed by a Boroo employee or a third party that includes, but is not limited to:

- Unwelcome comments, questions or jokes about a person's gender, sexual conduct or sexual orientation;
- Unwelcome sexual or physical conduct (e.g., touching, kissing, grabbing, massaging, slapping), as well as impeding or blocking movements;
- Unwanted comments, questions or jokes about a person's physical appearance or personal life;
- Suggestive behaviours such as leering and ogling or other sexually aggressive gestures;
- Displaying or distributing sexually explicit or otherwise offensive material through print or electronic media;
- Unwelcome advances, invitations or propositions of a sexual nature or repeated invitations after previous requests have been refused;

- Advances, invitations or propositions of a sexual nature, which might, on reasonable grounds, be perceived as placing a condition on a person's future employment, assignments or opportunity for promotion or training;
- Making or threatening reprisals after a negative response to sexual advances, invitations or propositions of a sexual nature; and
- Unwanted verbal abuse or threats of a sexual nature, graphic verbal comments about an individual's body or sexually degrading words used to describe an individual.

Sexual harassment can be physical, verbal or written. Males and females can be subjected to sexual harassment from a person of the same or opposite gender.

Sexual harassment may in certain circumstances constitute a criminal offence.

6. What is Workplace Violence?

In this Standard, the term "workplace violence" includes, but is not limited to, the following behaviour committed by a Boroo employee or a third party:

- The exercise of physical force in a workplace that causes or could cause physical injury to an employee;
- An attempt to exercise physical force in a workplace that could cause physical injury to an employee; and
- A statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, and that could cause physical injury to the employee.

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

- Hitting, kicking, punching, pushing, shoving, slapping, pinching, grabbing, or biting;
- Threatening to assault an individual; and
- Bringing a weapon of any kind to a Boroo workplace or possession of a weapon of any kind while carrying out Boroo business except where authorized by Boroo for the sole purpose of conducting Boroo business, or threatening to bring a weapon to a Boroo workplace.

7. Responsibility of Managers/Supervisors

The responsibilities of managers and supervisors with respect to this Standard include:

- Ensuring they comply with this Standard at all times;
- Monitoring the workplace to ensure as far as practicable that no employee is subjected to workplace harassment or violence;
- Immediately reporting all complaints of workplace harassment or violence they receive or witness to a designated local management contact. In the case of serious or imminent threat of physical harm to any person from workplace violence, contacting the police;
- Working with duly-appointed departments to investigate and resolve a complaint or suspicion of workplace harassment or violence; and
- Taking disciplinary action as appropriate for breaches of this Standard.

8. Responsibility of Employees

The responsibilities of employees with respect to this Standard include:

- Ensuring that they comply with this Standard at all times and acting responsibly to help establish a work environment that is free from harassment and violence;
- Following any procedure in their country or site pertaining to harassment and violence. In the absence of such a procedure, employees must inform a designated local management. This obligation extends to employees who experience the prohibited conduct as well as those who become aware of the prohibited conduct regardless of whether they are personally involved and regardless of whether the prohibited conduct involves other employees or other third parties. In the case of a serious or imminent threat of physical harm to themselves or any person from workplace violence, employees should contact the police;

9. Responsibility of Boroo

The responsibilities of Boroo with respect to this Standard include:

- Taking reasonable precautions to protect employees and prevent workplace harassment and violence;
- Posting this Standard on Boroo's Intranet and/or a conspicuous place in the workplace;
- Ensuring that the process for reporting and investigating incidents of workplace harassment and violence is followed in accordance with the *"Human Rights Reporting and Escalation Procedure"* and, *"Human Rights Investigation Procedure"*;
- Identifying and implementing disciplinary action, as appropriate, for breaches of this Standard; and
- Ensuring that this Standard is reviewed at least annually.

Anyone who is involved in an investigation into an incident of workplace harassment or violence is expected to keep this information confidential, except where such disclosure is authorized by Boroo or is necessary to properly respond to the allegation.

10. Prohibition of Reprisal

This Standard prohibits reprisals against employees who report an incident of workplace harassment or violence in good faith, or who assist in an investigation in response to an allegation of workplace harassment or violence. If an employee believes that he or she has suffered a reprisal in violation of this Standard, the employee should immediately advise his or her Human Resources representative or a designated local management. Incidents of reprisal will also be treated as a serious violation of this Standard, and employees who engage in reprisals or threats of reprisals will be subject to disciplinary action, up to and including, termination of employment.

If Boroo determines, following an investigation, that the report of workplace harassment or violence was made maliciously or in bad faith or that an employee intentionally provided false information during the investigation, the employee maybe disciplined up to and including termination of employment.