

TITLE:	Workplace Discrimination, Harassment, Bullying and Violence Policy
POLICY OWNER:	Chief Human Resources Officer
ID / VERSION NUMBER:	HR-0005 – Version 10
EFFECTIVE DATE:	March 7, 2023

PURPOSE:

The purpose of this Policy to establish Calian’s policies and procedures to ensure that all Calian Personnel work and operate in an environment that is free from discrimination, harassment, bullying and violence, where everyone is treated with dignity and respect.

SCOPE:

This Policy applies to Calian Group Ltd. and its subsidiaries (collectively “**Calian**”), including all Calian employees, contractors, directors, officers, executives, management and any other parties conducting work on Calian’s behalf (collectively “**Calian Personnel**”). At Calian’s discretion, any vendors, suppliers, customers, consultants, partners or any other third parties conducting business with Calian may also be bound by this Policy as a condition of doing business with Calian.

POLICY:

1. Calian believes in the prevention of workplace discrimination, harassment, bullying and violence and promotes a workplace in which all people treat one another with dignity and respect, and work together, in a diverse and inclusive workplace, to achieve common goals. Any and all forms of discrimination, harassment, bullying or violence committed by or against Calian Personnel or any third party is strictly prohibited will not be tolerated.
2. All parties bound by this Policy shall comply with this Policy and all applicable legislation related thereto, and ensure that Calian’s workplace remains free from discrimination, harassment, bullying and violence.
3. Every person has a right to equal treatment with respect to employment without discrimination related to personal characteristics, including colour, race, ethnicity, religion, nationality/citizenship, ancestry, age, marital status, sexual orientation, gender, gender identity and expression, disability, pregnancy, family status, record of offences and/or convictions for which a pardon has been granted, medical conditions, Aboriginal heritage, geography, covered veteran status, protected genetic information and political affiliation. Where there is a legal duty to accommodate, Calian will accommodate Calian Personnel to the point of undue hardship, in accordance with its obligations pursuant to applicable human rights legislation.

4. Any questions regarding the application of this Policy can be directed to Calian's Chief Human Resources Officer (the "CHRO").

Definitions

1. "accommodation" in the context of employment means adapting employment practices, systems or the work environment, or providing support mechanisms to enable personnel to meet the legitimate requirement, factor or qualification in the workplace that has created a barrier based on a particular individual's membership in a group protected by applicable human rights legislation. The duty to accommodate exists up to the point of undue hardship.
2. "discrimination" means improper differential treatment in or connected to the workplace related to any of the personal characteristics protected by applicable human rights legislation.
3. "harassment" includes personal harassment, sexual harassment, workplace harassment and any other form of harassment.
4. "personal harassment" is sometimes referred to as bullying and is a form of Discrimination. It includes any inappropriate conduct, comment, display, action, or gesture by a person that:
 - a) adversely affects another person's emotional, psychological, or physical well-being;
 - b) the perpetrator knows, or should know, would cause another person to be humiliated or intimidated; and
 - c) constitutes a threat to the health and safety of another person.

Typically, personal harassment involves repeat occurrences. A single incident may also constitute Personal harassment if serious or severe and is shown to have a lasting harmful effect on another person.

Personal harassment may include:

- a) imbalance of power and/or creation of fear that may not be gender specific and that creates a hostile work environment;
- b) verbal, physical, or written abuse or threats;
- c) insulting, derogatory or degrading comments, jokes, or gestures;
- d) personal ridicule or malicious gossip;
- e) malicious or unjustifiable interference with another's work;

- f) work sabotage;
 - g) refusing to work or cooperate with others; or
 - h) interference with, or vandalism of personal property.
5. “sexual harassment” refers to any sexually oriented conduct or behaviour, verbal, physical or by innuendo, that is objectionable, unwelcome or offensive and creates a negative working environment. Further, unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature constitute sexual harassment when:
- a) submission to the conduct is made either an explicit or implicit condition of employment;
 - b) submission to or rejection of the conduct is used as the basis for an employment decision affecting the harassed member of Calian Personnel; or
 - c) the harassment substantially interferes with the member’s work performance or creates an intimidating, hostile or offensive work environment.
6. “undue hardship” refers to the undue hardship that may be created for Calian upon providing a certain level of accommodation to Calian Personnel. Each accommodation situation must be assessed on its own set of circumstances to determine if Calian has reached the point of undue hardship. Factors that constitute or may contribute to undue hardship include, without limitation, insupportable costs, substantial disruptions of operations, and health and safety considerations.
7. “violence” includes any of the following:
- a) the exercise of physical force by a person against another person in a workplace that causes or could cause physical injury to such person;
 - b) an attempt to exercise physical force against a person in a workplace that could cause physical injury to such person; or
 - c) a statement or behaviour that it is reasonable for a person to interpret as a threat to exercise physical force against such person in a workplace that could cause physical injury to the person.
8. “workplace” means any land, premises or physical or virtual location where Calian Personnel is engaged in Calian’s business activities as part of their roles and responsibilities.
9. “workplace harassment” means engaging in a course of vexatious comment or conduct against another person in a workplace that is known or ought reasonably to be known to be unwelcome, including, without limitation, personal harassment and sexual harassment. Workplace harassment includes such unwelcome conduct related to any of the personal

characteristics described in Section 3 of this Policy and that detracts from another individual's ability to participate in a healthy and respectful work environment. Workplace harassment can exist even where there is no intention to harass or offend another. Workplace harassment does not include implementing appropriate dress codes, and day-to-day management decisions and supervisory actions such as workplace inspections, evaluations, appraisals, instruction, work and equipment assignment, and implementing disciplinary action (provided that the purpose of such management and supervisory decisions is not to discriminate against another person on the basis of a prohibited ground).

Calian Personnel Responsibilities

10. Calian Personnel shall:

- a) Take all reasonable steps to maintain a safe work environment;
- b) participate in and complete Calian-provided training and/or education related workplace discrimination, harassment, bullying or violence, as may be mandated by Calian from time to time;
- c) avoid engaging in discrimination, harassment, bullying or violent, threatening, intimidating or disruptive behaviours;
- d) when it does not pose a threat to one's safety, directly inform anyone engaging in workplace discrimination, harassment, bullying or violence that such conduct is inappropriate and must stop;
- e) promptly record any incident where they are subjected to, witnesses, or have knowledge of workplace discrimination, harassment, bullying or violence, or has reason to believe that workplace violence may occur, including dates, times, witnesses, and any other material details;
- f) promptly report any incident to Calian Management where they are subjected to, witnesses, or have knowledge of workplace discrimination, harassment, bullying or violence, or has reason to believe that workplace violence may occur;
- g) cooperate with all investigations under this Policy;
- h) maintain confidentiality over information provided and obtained in any investigations in accordance with this Policy; and
- i) otherwise comply with the terms of this Policy.

Management Responsibilities

11. All Calian Personnel in a management-level position (collectively "**Calian Management**") shall:

- a) become familiar with and uphold the terms of this Policy;
- b) communicate this Policy and its procedures to all Calian Personnel under their supervision;
- c) aide the Human Resources Department, as it may require, with the periodic assessment/reassessment of the risks of workplace violence;
- d) take actions as may be required to minimize or eliminate the risk of workplace discrimination, harassment, bullying or violence;
- e) when a victim of domestic violence has informed Calian that domestic violence or a threat for domestic violence exists, Calian shall take all measures necessary to ensure that the victim is protected while at work;
- f) encourage Calian Personnel under their supervision to participate in Calian Personnel learning activities on topics pertaining to diversity, inclusion, equity and belonging; and
- g) along with Calian's Human Resources Department, investigate reported incidents of workplace discrimination, harassment, bullying or violence and ensure appropriate corrective action is taken in a timely manner;

Human Resources Department Responsibilities

12. Calian's Human Resources Department shall:

- a) assist Calian Management with developing appropriate procedures to implement this Policy;
- b) initiate the annual review of this Policy;
- c) initiate the periodic assessment/reassessment of the risks of workplace violence that may arise from the nature of the workplace, the type of work or the conditions of work to ensure that this Policy continues to protect Calian Personnel from workplace violence and advise Calian's joint occupational health and safety committee of the results of the assessment/reassessment and provide a copy of same if the assessment is in writing; and
- d) investigate reported incidents of workplace discrimination, harassment, bullying or violence and ensure appropriate corrective action is taken in a timely manner;

Calian Personnel Requests for Accommodation

13. Calian Personnel requiring accommodations shall:

- a) advise his or her Calian manager/supervisor (“**Manager**”) of the need for accommodation in a timely manner and provide all relevant information necessary to assist Calian in assessing the request, including applicable medical reports that clearly set out the restrictions, functional abilities and accommodation needs of the individual and any other relevant information from other external professionals or officials;
 - b) cooperate with Calian in the search for and implementation of the accommodation; and
 - c) accept reasonable offers of accommodation from Calian.
14. The failure of Calian Personnel to cooperate with Calian as described above may result in his or her request for accommodation being denied.

Calian’s Responsibilities with Respect to Accommodation

- 15. Upon receipt, Calian shall assess requests for accommodation from Calian Personnel in order to determine if the accommodation applies pursuant to applicable human rights legislation;
- 16. Calian shall determine what information it requires from the Calian Personnel member making a request for accommodation in order to appropriately assess and/or ascertain the nature of the accommodation required and will request such information from the member;
- 17. Where there is a legal duty to accommodate, Calian shall provide appropriate accommodation(s) to Calian Personnel up to the point of undue hardship;
- 18. Calian will maintain any information provided by Calian Personnel requesting accommodations in as confidential a manner as possible and only will release such information to those who need to know in order to assist in identifying accommodations and/or in implementing accommodations for the particular individual.
- 19. In the event an accommodation cannot be provided, either because no accommodation is possible or because the accommodation would cause undue hardship to Calian, Calian will advise the particular individual accordingly.

Procedure for Summoning Immediate Assistance When Needed

- 20. Examples of incidents where immediate assistance may be required include, without limitation, the potential for or existence of immediate danger to an individual(s), the involvement of weapons, physical injury related to violent behaviour; and obvious signs of abusive or threatening behaviour.
- 21. If an incident arises at the workplace that requires immediate assistance as described above, any party bound by this Policy shall immediately call 9-1-1 and promptly inform

their Manager, who shall then ensure appropriate corrective action is taken in a timely manner, including reporting such incident to Calian's Senior Management Team.

Procedure for Reporting Incidents of Workplace Discrimination, Harassment, Bullying or Violence

22. The reporting procedures described herein apply to all Calian Personnel regardless of whom the offender is. If the offender is not part of Calian Personnel, Calian's Human Resources Business Partner ("HRBP") shall work jointly with all appropriate external bodies to resolve the matter.
23. All Calian Personnel who feel they have been subjected to, or have witnessed, workplace discrimination, harassment, bullying or violence must immediately report the incident to their Manager, unless that individual is the offender, in which case the incident should be reported directly to Calian's HRBP or CHRO.
24. Any person subjected to workplace violence should, where appropriate, go to a safe location at the workplace and report the incident to their Manager so that the incident can be investigated and addressed. If their Manager is the offender, the victim should report the incident(s) directly to Calian's HRBP or the CHRO.

Procedure for Investigating a Complaint

25. Under exigent or emergency circumstances involving workplace violence, Calian Management shall:
 - a) ensure their own safety and the safety of Calian Personnel under their supervision;
 - b) ensure appropriate medical treatment is provided or sent for;
 - c) report the incident to the appropriate law enforcement authorities as soon as possible (i.e., police or Ministry of Labour, as applicable);
 - d) contact the HRBP or Calian's Human Resources Department as soon as possible to assess who should be involved in the investigation; and
 - e) once the incident is under control, record all relevant details of the incident and the investigation.
26. In a situation of a complaint of discrimination, harassment, bullying or non-emergency workplace violence, Calian Management shall gather all relevant information about the complaint from the reporting party, including, but not limited to:
 - a) date of the incident(s);
 - b) names of parties involved; and

- c) description of the incident.
27. The above information must be provided to Calian's HRBP or CHRO in written format by the applicable Manager and together they shall determine the appropriate next steps.
28. The HRBP or the CHRO will lead the investigation of an aforementioned incident and will conclude such investigation with a written report that will be provided to both the complainant and the alleged offender. The report must include the following:
- a) date of receipt of the complaint;
 - b) date of the incident(s);
 - c) identification of the complainant;
 - d) identification of the accused or witnesses, and the actions complained of, including all relevant background facts and circumstances;
 - e) a statement detailing the scope of the investigation that has been undertaken and the results thereof; and
 - f) where possible, a statement of corrective measures and/or sanctions.
29. In all cases involving charges of workplace discrimination, harassment, bullying or violence, all parties involved will be given the utmost protection of privacy and confidentiality, as reasonably possible under the circumstances. The identity of the parties involved, or the circumstances of the complaint will not be disclosed, except where disclosure is necessary for the purposes of investigating and reporting on such investigation or where such disclosure is required by law. Additionally, any individual reporting workplace discrimination, harassment, bullying or violence hereunder in good faith shall not be subject to any form of reprisal.

Discipline Procedures

30. Where workplace discrimination, harassment, bullying or violence has been substantiated pursuant to this Policy, corrective action, up to and including immediate termination of employment of the offenders, (if warranted) will be taken based on the severity of the incident, taking into consideration the persistence of the offender, severity of the behaviour, cooperation and willingness to change. These same principles apply to all Calian Personnel who interfere with the investigation or resolution of a complaint under this Policy or who retaliate against Calian Personnel who file complaints in good faith or who otherwise participate in investigations under this Policy. Any Calian Personnel who subject any other person to workplace discrimination, harassment, bullying or violence or allow or create conditions that support workplace discrimination, harassment, bullying or violence may also face disciplinary action up to and including termination of employment.

31. Where workplace discrimination, harassment, bullying or violence has not been substantiated, no action will be taken against the complainant as long as the complaint was made in good faith. It is unacceptable for anyone to hold the event against either the complainant in the case of a complaint made in good faith or the accused in the case of an unfounded complaint. Similarly, no action will be taken against individuals who make requests for accommodation in good faith. Due to the serious nature of these matters, any party bound by this Policy who deliberately makes false statements of fact during an investigation, or fails to fully cooperate with an investigation, is subject to disciplinary action, up to and including termination of employment.

Compliance with Applicable Legislation

32. This Policy is drafted with a primary focus on workplace discrimination, harassment, bullying and violence in Canada. Notwithstanding the foregoing, all parties bound by this Policy shall comply with all applicable laws and regulations, which may vary depending on the jurisdiction in which a Calian subsidiary operates and/or Calian Personnel is located. Any inquiries or concerns regarding compliance with applicable legislation or the appropriate legislation to be applied in a given situation can be addressed to Calian's Chief Human Resources Officer or Calian's General Counsel.

Referring Complaints Externally

33. Notwithstanding the foregoing, nothing in this Policy shall prevent or discourage Calian Personnel from referring a workplace discrimination, harassment, bullying or violence complaint to applicable occupational health and safety organizations, human rights commissions and/or tribunals or any other applicable external authorities. All Calian Personnel retain the right to exercise any other legal avenues available to him or her.

Policy Compliance, Reporting and Enforcement

34. This Policy and its enforcement will be taken seriously, including the investigation of any breaches or alleged breaches. All parties subject to this Policy are expected to provide full cooperation into any investigation under this Policy.
35. Violations or suspected violations of this Policy should be immediately reported to a supervisor/manager or any level of management within Calian that the reporting party feels comfortable with. Any party who receives a submission from any person regarding a reportable activity shall immediately report such submission to the CHRO along with Calian's Chief Financial Officer (the "CFO") or Chief Executive Officer (the "CEO"), regardless of the materiality of the suspected violation. If the reportable activity concerns the activities of the CHRO, then the submission should be passed on directly to the CFO or the CEO. If the reportable activity concerns the activities of the CFO or the CEO, then the submission should be passed on directly to the Chair of Calian's Audit Committee or Chair of Calian Group Ltd.'s Board of Directors (the "**Board of Directors**").
36. Sanctions for breach of this Policy may be imposed by Calian, including termination of employment.

37. Any report of a violation of this Policy made in good faith shall not be subject to any form of reprisal, provided the reporting party is not involved or implicated in the violation. If the reporting party is involved or implicated in the violation, the party's act of self-reporting the violation will be considered when determining an appropriate sanction.

Policy Approval

38. This Policy shall be approved annually by the Board of Directors.

Policy Assessment

39. Calian may periodically review and assess this Policy and changes or modifications may be implemented from time to time without notice as Calian deems necessary.