



## **Disrespectful Behaviour, Harassment and Violence in the Workplace**

Canadian Bank Note Company, Limited (CBN) has enacted a written policy prohibiting harassment and violence in the workplace as required by legislation in Ontario known as Bill 168 that amended the Occupational Health and Safety Act.

The policy also prohibits disrespectful behaviour which has no place in our work environment. Everyone is encouraged to read the policy in full but here are a few of the most important things to know:

**Q: What is disrespectful behaviour?**

**A:** Any single statement or act that is degrading, insulting, offensive or deliberately annoying or that is discriminatory under any of the prohibited grounds defined in the *Ontario Human Rights Code* or the human rights law of the jurisdiction in which the behaviour takes place.

*Examples of disrespectful behaviour include but are not limited to:*

- *Comments or "jokes" that are racist or that degrade on the basis of gender, place of birth, nationality, religion, sexual orientation or any other discriminatory basis;*
- *The display or circulation of offensive material, including discriminatory or sexually provocative words or images;*
- *Comments or "jokes" that are intended to degrade or embarrass an individual based on that person's physical attributes or personality; and*
- *Inappropriate physical contact.*

**Q: What is workplace harassment?**

**A:** Repeatedly engaging in disrespectful behaviour.

**Q: What is workplace violence?**

**A:** It is an intentional use of physical force that causes or may cause physical injury to a worker and includes any attempt or threat to do so.

**Q: What can happen to me if I breach this policy?**

**A:**

- You will be subject to discipline which may include dismissal.

- In the case of workplace violence the company may be legally required under the Occupational Health & Safety Act to notify your co-workers that you present a risk of violence.
- You put yourself at risk of criminal prosecution.

**Q: What should I do if I or someone I know is subjected to disrespectful behaviour, workplace violence or workplace harassment?**

**A:** You should tell your manager, the Executive Director of Human Resources or the Vice-President of Corporate Affairs as soon as possible.

**Q: What should I do if it is an emergency?**

**A:**

- Go to a place of safety;
- Contact CBN Security at extension 1111;
- If there is no answer call 911
- If you have reported the emergency to the 911 operator try again to reach CBN Security or go to the Security Operations Centre if it is safe to do so.

In each case give your name and location to the person who answers your call.

**Q: Where can I find a copy of the full policy?**

**A:**

- It is prominently posted on bulletin boards throughout CBN facilities;
- It is posted electronically on Inside CBN
- It can be obtained in hard copy by asking anyone in HR, Health and Safety, or Legal
- You can request a copy from your supervisor.

**Q: If my supervisor is constantly reminding me to get back to work or that I am late for work am I being subjected to workplace harassment?**

**A:** No. Corrective instruction from management is not harassment even though you may find it annoying.

**Q: What should I do if I have other questions about the policy?**

**A:** Ask your manager, employees of the Human Resources Department, Health and Safety Department or Legal Department. You can also send an email to the Executive Director of Human Resources at [hrquestions@cbnco.com](mailto:hrquestions@cbnco.com)



## Disrespectful Behaviour, Harassment and Violence in the Workplace Policy

**Anyone who believes that an incident of Workplace Violence is likely to occur or has occurred is urged to advise their manager immediately or call the Security Operations Center at +1 613 722 3421 extension 1111.**

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## POLICY STATEMENT

Canadian Bank Note Company, Limited (the "Company") will not tolerate disrespectful behaviour, harassment or violence within the workplace or in other places its employees are required to work.

Employees and all others who enter our facilities are required to comply with this policy as a condition of continued employment or access to those facilities. Disrespectful behaviour, harassment and violence can have lasting negative impact on the individuals directly affected, on the productivity and morale of the workforce generally and the reputation of the Company.

Every employee who breaches this policy is subject to discipline which may include dismissal. Every other person who breaches this policy on Company premises is subject to immediate removal and denial of future access or other appropriate sanction as determined by senior management.

Every person who experiences or observes behaviour of the type prohibited under this policy while on Company premises or while engaged in Company business is urged to report that behaviour to their manager, to the Executive Director of Human Resources or to the Vice President, Corporate Affairs.

## DEFINITIONS

In this Policy and the Procedures that follow, the following terms when capitalized have the meanings noted.

<b>Abuse of Authority</b>	Abuse of authority means an individual's improper use of power and authority inherent in the position held, to endanger an employee's job, undermine the performance of that job, threaten the economic livelihood of the employee, or in any way interfere with or influence the career of such an employee. It includes such acts or misuses of power as intimidation, threats, blackmail, coercion, isolation or deprivation of information that the employee requires to properly fulfill his or her employment responsibilities. Normal managerial activities including, but not limited to, performance management and reviews, attendance management, counseling or corrective instructions or discipline do not constitute Abuse of Authority.
<b>Business Contact</b>	Is any individual representing a vendor, subcontractor, supplier, consultant or customer of the Company who, during the course of business, interacts with a person to whom this Policy applies.
<b>Complainant</b>	Refers to an individual who has reasonable cause to believe that he or she has been the subject of Disrespectful Behaviour Harassment or Workplace Violence and who complains, whether informally or formally using the procedures outlined in this Policy.
<b>Disrespectful</b>	Is any behaviour that a reasonable person would consider degrading,

<p><b>Behaviour</b></p>	<p>insulting, offensive or deliberately annoying or that is discriminatory under any of the prohibited grounds defined in the <i>Ontario Human Rights Code</i> or the human rights law of the jurisdiction in which the behaviour takes place.</p> <p>Examples of Disrespectful Behaviour include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Comments or “jokes” that are racist or that degrade on the basis of gender, place of origin, nationality, religion, sexual orientation or any other discriminatory basis;</li> <li>• The display or circulation of offensive material, including discriminatory or sexually provocative words or images;</li> <li>• Comments or “jokes” that are intended to degrade or embarrass an individual based on that person’s physical attributes or personality; or</li> <li>• Inappropriate physical contact.</li> </ul>
<p><b>Harassment</b></p>	<p>Is a course of conduct or comment that is directed at and is annoying or offensive to an individual or group of individuals that the person engaging in the conduct or comment knows or should reasonably know is unwelcome. Harassment includes continuing Disrespectful Behaviour, in words, gestures, or images. Harassment includes Workplace Harassment and Workplace Violence as defined in the Occupational Health and Safety Act of Ontario. Harassment also includes conduct, physical contact, comments or gestures of a sexual nature that is known to be or should reasonably be expected to be unwelcome.</p> <p>Examples of Harassment include but are not limited to:</p> <ul style="list-style-type: none"> <li>• The repetition of Disrespectful Behaviour after a request to stop;</li> <li>• Repeated suggestive or obscene comments or gestures;</li> <li>• Touching, leering or other conduct of a sexual nature;</li> <li>• Assaults;</li> <li>• Threats to cause harm to an individual;</li> <li>• Intimidation; and</li> <li>• Abuse of Authority.</li> </ul>
<p><b>Respondent</b></p>	<p>Refers to the person against whom a complaint of alleged Disrespectful Behaviour or Harassment has been made, whether formally or informally using the procedures outlined in this Policy.</p>
<p><b>Workplace</b></p>	<p>Includes the working environment on Company premises or anywhere else an employee may be located as a result of employment responsibilities or employment relationships. The</p>

	workplace includes for example, places outside of the Company premises where employees are required to be in the course of work assignments and work-related travel; work-related conferences or training sessions; office-related social functions; and the “virtual” workplace over the telephone, in written material such as e-mail, and on the Internet.
<b>Workplace Harassment</b>	Has the same meaning as in the Occupational Health and Safety Act namely: engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome
<b>Workplace Violence</b>	Has the same meaning as in the Occupational Health and Safety Act namely: It is the attempted or actual exercise of any intentional physical force that causes or may cause physical injury to a worker. It also includes any threats which give a worker reasonable grounds to believe he or she is at risk of physical injury.

**POLICY APPLICATION**

This Policy applies to all persons working in or for the Company including management regardless of their tenure and including, without limitation, indeterminate and temporary employees, casual employees, students, independent contractors and employment agency personnel. This Policy also applies to volunteers at the Company.

Acts of Disrespectful Behaviour, Harassment or Workplace Violence by Business Contacts are also considered inappropriate conduct for the workplace and are counter to the philosophy and objectives of the Policy.

Employees are urged to report conduct by Business Contacts that violates this Policy to their manager, the Executive Director of Human Resources or the Vice-President Corporate Affairs.

**ROLES AND RESPONSIBILITIES**

Everyone working at the Company has a responsibility to ensure that the working environment is free from Harassment and to co-operate, as required in the investigation of a complaint.

**Complainants** have the right to file a legitimate complaint and to obtain a review of their complaint without fear, reprisals or retaliation.

**Respondents** have the right to be informed promptly that a formal complaint has been filed against them and to be presented with a written statement of allegations and given the opportunity to respond to the formal complaint. Respondents must avoid taking retaliatory action or directly or indirectly through friends or colleagues pressuring the

Complainant to withdraw the complaint. Any breach of the latter obligation can lead to an adverse inference being drawn and can result in discipline that may include dismissal.

**Management** (including Presidents, Vice-Presidents, Directors, and Managers) are responsible for receiving any formal or informal complaints brought to them directly. They must be sensitive to the possibility of Disrespectful Behaviour and Harassment including Workplace Violence in their areas of responsibility and must strive to set a positive example for those who report to them by themselves avoiding engaging in or condoning Disrespectful Behaviour, Harassment or Workplace Violence. They must also be committed to ensuring that that work environment is free of Disrespectful Behaviour, Harassment and Workplace Violence. Each member of management and each Team Lead has a responsibility to take immediate and appropriate action where an instance of Disrespectful Behaviour, Harassment or Workplace Violence becomes apparent, whether reported or not. They should consult with the Executive Director of Human Resources or the Vice-President Corporate Affairs. Management is expected to ensure that employees appreciate diversity in the workplace and strive to create a respectful and Harassment free workplace.

**The Executive Director of Human Resources** must ensure that complaints are addressed in a timely and confidential manner and must ensure parties to a complaint of Disrespectful Behaviour, Harassment or Workplace Violence are treated in a sensitive and respectful manner. It is the responsibility of the Executive Director of Human Resources to ensure all employees are made aware of this Policy and to answer any enquiries regarding this Policy.



## **COMPLAINTS PROCEDURE**

### **1. Informal Complaints**

A person who believes that he or she has been subjected to Disrespectful Behaviour, Harassment or Workplace Violence is encouraged to communicate his or her concerns directly by telling the person engaging in the behaviour that the behaviour is unwelcome and must stop.

In the event that the behaviour complained of does not stop, or if the person subjected to the behaviour is unwilling to bring the matter directly to the attention of the person engaging in the behaviour, the person subjected to the behaviour should seek the advice of his or her manager, the Executive Director of Human Resources or the Vice-President Corporate Affairs.

Provided that the behaviour complained of is behaviour that has been not been previously addressed and is not likely to have a lasting impact on the Complainant or others, the management person so contacted must either:

- a) informally deal with the allegation by speaking with the person who has allegedly engaged in the Disrespectful Behaviour, Harassment or Workplace Violence to determine if the behaviour is acknowledged and if so to insist that the behaviour cease, or
- b) refer the complaint to the Executive Director of Human Resources or Vice-President Corporate Affairs.

If a Complainant initially contacts the Executive Director of Human Resources (or the Vice-President Corporate Affairs) he or she must either:

- a) informally deal with the allegation by speaking with the person who has allegedly engaged in the Disrespectful Behaviour, Harassment or Workplace Violence to determine if the behaviour is acknowledged and if so to insist that the behaviour cease, or
- b) assist the Complainant to complete a formal written complaint.

If the behaviour complained of is behaviour that has been previously addressed but is being repeated or is likely to have a lasting impact on the Complainant or others, the management person so contacted must advise the Executive Director of Human Resources or the Vice-President Corporate Affairs who will assist the Complainant to complete and submit a formal written complaint:

### **2. Mediation**

At any time during the process and if both parties agree, the Company may retain a mediator (an outside independent third party) to assist the Complainant and

Respondent in finding a mutually acceptable resolution to the complaint. Retaining a mediator is at the sole discretion of the Company.

### **3. Third Party Complaints**

Where a person believes a colleague has experienced or is experiencing Disrespectful Behaviour, Harassment, or Workplace Violence he or she shall report this belief to the Executive Director of Human Resources or the Vice-President Corporate Affairs who shall then meet with the person subjected to the behaviour to determine whether the matter should be the subject of a formal or informal complaint.

### **4. Formal Complaints**

If a complaint is not satisfactorily resolved informally or through mediation, the Complainant has the right to lay a formal complaint. To do so the Complainant must prepare and submit to the Executive Director of Human Resources (or the Vice-President Corporate Affairs) a written complaint signed by the Complainant that details the behaviour complained of and any previous objections to the behaviour by the Complainant. The Executive Director of Human Resources (or Vice President Corporate Affairs) will then provide a copy of the complaint (along with a copy of this Policy), without delay, to the Respondent.

Please note that anonymous complaints cannot be fairly or adequately evaluated or investigated and so will not be dealt with under this policy.

### **5. Management Initiated Investigations**

The Company reserves the right to commence an informal investigation and to take disciplinary or remedial action whenever it becomes aware of Disrespectful Behaviour, Harassment or Workplace Violence by whatever means and regardless of whether or not there is an identifiable Complainant.

## **INVESTIGATION OF FORMAL COMPLAINTS**

The following steps will be taken in the investigation of a formal complaint:

- (a) The Executive Director of Human Resources (or Vice-President Corporate Affairs) will arrange for the investigation of every formal written complaint unless it is decided to dismiss the complaint as outlined below. In general the investigation will be conducted using internal resources however in some circumstances the Company may engage an external resource to conduct the investigation.
- (b) Senior management may elect to reassign the Complainant or the Respondent or both pending the conclusion of the investigation in order to minimize or avoid contact between the Complainant and the Respondent.

- (c) At any time during the investigation, the Complainant and Respondent have the right to be accompanied and assisted in the process by one (1) representative of their choice, for example, a colleague, union representative or friend, if they wish.
- (d) The Director of Human Resources (or Vice-President Corporate Affairs) will keep both the Complainant and Respondent informed of the status of the investigation throughout the process.
- (e) When the investigation is complete, a preliminary investigation report will be drafted by the investigator (whether internal or external) and given to both the Complainant and the Respondent. Both parties will have a period of one (1) week to respond to the report, in writing.
- (f) After reviewing the responses to the report, if any, the investigator will prepare and submit a final report, with his or her findings with respect to each allegation in the complaint. He or she will provide this report to the Executive Director of Human Resources or Vice-President Corporate Affairs. If the investigator is an outside resource, the final report shall not include recommendations as to remedial action.
- (g) The Executive Director of Human Resources (or Vice-President Corporate Affairs) will take the appropriate remedial action that will best remedy, resolve or dispose of the complaint.
- (h) A copy of the final report will be provided to the Complainant and the Respondent. If the complaint is substantiated, the Complainant will be advised of any remedial action taken in relation to his or her complaint.
- (i) The Executive Director of Human Resources (or Vice-President Corporate Affairs) shall inform senior management of the existence of any formal complaints, the results of any investigations, and the remedial and disciplinary actions taken, if any.

## **DISMISSAL OF A COMPLAINT**

At any time during the investigation or thereafter, the Executive Director of Human Resources (or Vice-President Corporate Affairs), in consultation with senior management, may in his or her discretion decide to dismiss a formal complaint if:

- With the agreement of the parties, the situation is resolved through mediation;
- The Respondent dies, resigns or is dismissed from his or her employment with the Company;
- The complaint does not relate to Disrespectful Behaviour, Harassment or Workplace Violence as defined by this Policy;
- The complaint is obviously trivial, frivolous, malicious, vexatious or made in bad faith;

- The Complainant abandons the complaint or fails to cooperate in resolving the complaint in a timely fashion; or
- The complaint is anonymous.

The Executive Director of Human Resources (or Vice-President Corporate Affairs) will communicate the decision to dismiss a complaint to the affected parties, except in the case of anonymous complaints.

## **REMEDIAL ACTION AND DISCIPLINE**

Remedial action may include a formal apology to the Complainant and others affected from the Respondent, awareness training, removal or destruction of offensive material or other appropriate remedy in the circumstances.

Discipline, up to and including immediate termination for just cause may be imposed on the following individuals in the following circumstances:

- Respondents when a complaint of Disrespectful Behaviour, Harassment or Workplace Violence has been substantiated;
- Managers who were aware of Disrespectful Behaviour, Harassment or Workplace Violence and permitted it to take place;
- Complainants who bring forward complaints in bad faith or for malicious or vexatious reasons;
- Complainants who knowingly make a false accusation of Disrespectful Behaviour, Harassment or Workplace Violence;
- Any employee who fails or refuses to co-operate with an investigation of a complaint under this Policy;
- Any employee who retaliates against any individual for having made a complaint or having conducted, participated in or co-operated in any investigation of a complaint under this Policy.

## **CONFIDENTIALITY**

The Company recognizes the Complainant's and Respondent's interest in confidentiality.

To protect the interests of the Complainant, the Respondent and any others who may report or be witnesses to such incidents, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

Only those with a need to know about the complaint will be made aware that an investigation is ongoing.

The results of any investigation will also be kept confidential and will be disclosed only on a need to know basis.

## **RISK ASSESSMENTS**

The Company shall prepare and update as necessary a risk assessment that assesses the risks of Workplace Violence that may arise from the nature of the workplace, the type of work or the conditions of work and takes into account:

- (a) circumstances that would be common to similar workplaces
- (b) circumstances specific to the workplace; and
- (c) any other matters required by law.

Each such risk assessment shall be provided to the Joint Health and Safety Committee.

## **ANNUAL REVIEW**

This policy shall be reviewed annually as required by the Occupational Health and Safety Act.

## **IMPLEMENTATION PROGRAM**

The Company shall at all times have in place a program to address Workplace Violence that among other things that may be required by regulation, includes the following elements:

- (a) measures and procedures to control the risks identified in the latest risk assessment as likely to expose a worker to physical injury; and
- (b) measures and procedures for summoning immediate assistance when Workplace Violence occurs or is likely to occur;

## **HOW TO MAKE A COMPLAINT**

A complaint may be made:

- (a) orally to or by handing a note to the employee's manager;
- (b) by visiting or calling in the Executive Director of Human Resources at +1 613 722-3421 extension 1369;
- (c) by visiting or calling the Vice-President Corporate Affairs at +1 613 722 3421 extension 1128;
- (d) by sending a note addressed to either the Executive Director of Human Resources or the Vice-President Corporate Affairs addressed to him or

her at Canadian Bank Note Company, Limited 145 Richmond Road  
Ottawa, Ontario, Canada K1Z 1A1 including the Complainant's name and  
contact information.

## **DOCUMENT RETENTION**

Documents pertaining to any complaint that is upheld will be retained until the Respondent ceases to be employed by the Company and a summary of the nature of such a complaint shall be retained indefinitely.

Documents pertaining to a complaint that is not upheld shall be retained for a period of four years.

## **EMERGENCIES**

**Anyone who believes that an incident of Workplace Violence is likely to occur or has occurred is urged to advise their manager immediately or call the Security Operations Center at +1 613 722 3421 extension 1111.**

## **POSTING**

This Policy and procedures shall be posted in a conspicuous place in each workplace.

## **APPROACHING TRUSTED COLLEAGUES**

Nothing in this policy is intended to discourage anyone from talking with a trusted colleague or any member of management about concerns they may have that relate to any of the issues the policy is designed to address. If you still have concerns after doing so, you are encouraged to report your concerns to your manager, the Executive Director of Human Resources or the Vice-President Corporate Affairs.

**This Policy and related procedure was adopted on May 20th, 2010 and most recently reviewed and amended on March 15, 2016.**



**Ron Arends**  
**President & Chief Executive Officer**