

## **PURPOSE**

This BC Workplace Bullying & Harassment Policy (the “**Policy**”) is designed to address Worksafe B.C. obligations and applies to all of Interfor Corporation’s operations in British Columbia (“**BC Operations**”).

Bullying and harassment is not acceptable or tolerated in the workplace.

Concerns or issues involving discrimination under applicable Human Rights legislation, including complaints of sexual harassment or discrimination under such legislation, will continue to be addressed under Interfor’s Human Rights Policy.

## **APPLICATION**

This Policy applies to Interfor Corporation’s and its subsidiaries’ (collectively “**Interfor**”) directors, officers, employees (permanent and temporary), contractors, consultants and agents when working in its BC Operations (“**Interfor Personnel**”).

## **POLICY**

### **1.0 BULLYING & HARRASSMENT**

Bullying and harassment includes any inappropriate conduct or comment by a person towards an Interfor Personnel that the person knew or reasonably ought to have known would cause that Interfor Personnel to be humiliated or intimidated, but excludes any reasonable action taken by an employer or supervisor relating to the management and direction of Interfor Personnel, or the place of employment.

Examples of conduct or comments that may constitute bullying or harassment include verbal or physical abuse, threats, violence, insults or intimidation and subtler forms of harassment such as belittling conduct, offensive non-verbal gestures, ignoring or isolating a person, vandalizing personal belongings, and spreading malicious rumours.

To constitute harassment there must be: a) repeated conduct, comments, displays, actions or gestures; or b) a single serious occurrence of conduct, or a single serious comment, display, action or gesture, that has a lasting, harmful effect on a person.

Bullying and harassment **DOES NOT** include:

- Workplace supervision, direction and management undertaken in a good faith manner for a legitimate work purpose.
- Interpersonal conflict that is not abusive or threatening.

### **2.0 RESPONSIBILITIES**

2.1 All Interfor Personnel are responsible for: a) not engaging in bullying and harassment of any kind; b) promptly reporting breaches or suspected breaches of this Policy; c) complying with this Policy including fully cooperating with investigations into potential breaches; d) promptly addressing interpersonal conflict before it escalates to harassment or interferes with safety and productivity; and e) complying with any applicable Occupational Health & Safety policies, procedures and laws.

- 2.2 Any Interfor Personnel found to have harassed or bullied another employee may be subject to discipline which may, dependent on the circumstances, include immediate termination of employment or services.
- 2.3 Any Interfor Personnel who brings a false, reckless or malicious complaint is also subject to discipline which may, dependent on the circumstances, include immediate termination of employment or services.
- 2.4 Any Interfor Personnel who retaliates against a person for bringing a complaint of bullying and harassment or participating in an investigation will be subject to discipline up to and including immediate termination of employment or services.

### **3.0 HANDLING OF COMPLAINTS**

- 3.1 Step 1: When an Interfor Personnel encounters objectionable conduct, he or she must report the allegations to his/her supervisor. If the conduct involves the supervisor, or the supervisor is unavailable, the allegations should be reported to the appropriate manager or to Human Resources. Complaints should be reported as soon as possible after experiencing or witnessing an incident. Interfor Personnel will be required to submit a written complaint using the Workplace Bullying and Harassment Complaint Form attached to this Policy. It can also be found at <http://ifpmoss/Interforum/default.aspx>.

Interfor Personnel making a complaint should provide as much information as possible, including the names of people involved, witnesses (if any), where the event(s) occurred, when they occurred and what behavior or words led to the complaint and attach any supporting documents, such as emails, notes or photos. In the event that the Interfor Personnel does not want to provide a written complaint, Interfor may still initiate a formal investigation at its discretion if deemed necessary to ensure the health and safety of persons at the workplace or comply with its legal obligations.

Step 2: If there is a sufficient basis in the written complaint or Interfor otherwise deems it necessary to do so, Interfor will carry out an investigation, using either an internal or external investigator(s). The investigation will be fair and impartial, and will be confidential. Information gathered during the investigation will be disclosed to persons only as necessary to carry out a proper investigation, address the findings from the investigation, and for Interfor to carry out its legal obligations.

- 3.2 This procedure is intended to be flexible in order to respond to the specific circumstances of a complaint. Interfor reserves the right to engage in a different procedure as deemed appropriate in any given circumstance.

### **4.0 ADMINISTRATION AND INTERPRETATION**

- 4.1 **Policy Modifications.** This Policy is subject to ongoing review and evaluation, and modifications will be made as deemed necessary to respond to circumstances and evolving needs of Interfor. You are responsible for regularly reviewing its terms and conditions.
- 4.2 **Conflicts.** Where there is a conflict or overlap between this Policy and the Code of Conduct, this Policy governs for BC Operations.

4.3 **Interpretation.** Interfor's Vice President, Human Resources is responsible for the interpretation of this Policy. All questions regarding this Policy are to be referred to Interfor's Vice President, Human Resources.

## 5.0 REFERENCES

In addition to this Policy, Interfor Personnel shall ensure the compliance with the following Interfor policies:

- Code of Conduct
- Human Rights Policy
- Whistleblower Policy

**END OF POLICY**