

Anti-Harassment Policy

Foster & Associates Financial Services Inc. ("FOSTER") is committed to creating a safe and inclusive workplace where everyone is treated with respect and dignity. Discrimination, harassment, and violence have no place at the firm, and we do not condone any such actions.

The objectives of this policy are to provide an anti-discrimination, anti-harassment, and anti-violence policy and program that meets or exceeds the legal requirements in the province of Ontario.

We want to make sure that everyone at FOSTER understands their roles and responsibilities in preventing discrimination, harassment, and violence in the workplace. We also want to provide an effective method for employees to report any incidents without fear of retaliation.

Scope of Application

This Policy applies to all workers at FOSTER and addresses workplace harassment from all sources, including customers, clients, employers, supervisors, workers, and members of the public.

The Policy applies to all work locations, including the office, client sites, work-related events, firm-sponsored functions, and virtual work environments including remote work performed from home or other locations.

Roles and Responsibilities

At FOSTER, we believe that treating each other with respect is everyone's responsibility to create a safe and inclusive workplace where everyone feels valued and respected. If you witness or experience any form of discrimination, harassment, violence, or threat of violence in the workplace, please report it as soon as possible.

Waiting to report an incident can have a more negative impact, so it's important to address it promptly. We also ask that you respect the confidentiality of anyone involved in a harassment complaint.

We take all complaints involving alleged harassment or discrimination seriously. We want everyone to feel comfortable and safe reporting incidents of discrimination or harassment, knowing that they will be taken seriously and addressed promptly, promptly, fairly, and confidentially.

Workplace Discrimination, Violence and Harassment

FOSTER does not tolerate workplace discrimination, harassment, or violence in any form. We are committed to identifying and addressing these incidents, and any employee found to have

engaged in such behaviour will be subject to disciplinary action, up to and including termination for cause.

Training

We will provide training to all employees on the application of this policy to empower our employees to help us prevent discrimination, harassment, and violence.

We also regularly review this policy to stay up-to-date with best practices and legal requirements.

Definitions:

“Discrimination”

At FOSTER, we believe that everyone has the right to equal treatment in employment, regardless of their race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability, or record of offences.

Discrimination occurs when someone is treated differently based on one of these characteristics, which results in unfair treatment or limited access to opportunities.

“Harassment”

Harassment is defined by the Human Rights Code as engaging in vexatious comments or conduct that is known or ought to be known to be unwelcome based on one of the Prohibited Grounds. In addition, OHSA defines workplace harassment broadly as any conduct, comment, gesture, or action that is likely to cause discomfort, offence, or humiliation to any employee and is known or ought reasonably to be known as unwelcome. This includes behaviours such as bullying or verbally abusive behaviour and is contrary to OHSA regardless of whether it is based on one of the Prohibited Grounds stated above.

Examples of harassment include:

- Spreading malicious rumours, gossip, or innuendo;
- Intimidating or threatening a person;
- Making jokes, pranks or comments that are intended to humiliate;
- Belittling, demeaning, or patronizing an employee in front of colleagues;
- Making disparaging remarks about a person's age, race, disability, sex, or other personal characteristics;
- Engaging in unwelcome physical contact;
- Displaying or circulating materials that are sexist, racist, or otherwise offensive.

- Retaliating against an employee for filing a complaint of discrimination or participating in complaint proceedings.

"Workplace Sexual Harassment"

Sexual harassment in the workplace means:

- Making unwelcome sexual comments or behaving in a way that makes someone feel uncomfortable because of their sex, sexual orientation, gender identity, or gender expression.
- Making a sexual request or advance towards someone who is in a position to give you a benefit or advancement, and who did not want this from you.

Examples of sexual harassment can include:

- unwelcome physical contact;
- display of offensive pictures, graffiti, cartoons or other material;
- Making comments or gestures that are suggestive or rude;
- Insulting or leering.

Any type of communication (verbal, emailing, voicemail, newsletter, etc.) that contains any material that could be considered sexual harassment is against our policy.

"Workplace Violence"

Workplace violence is when someone uses physical force against an employee that can hurt them or tries to use physical force that can hurt them. It can also be when someone says or does something that makes an employee think they might hurt them.

Examples of workplace violence are things like hitting, pushing, kicking, sexual assault, throwing things, and any behavior or action that might hurt someone or damage property. This also includes disruptive behavior.

If an employee thinks that they might be in danger of workplace violence, they can refuse to work.

"Virtual Harassment"

FOSTER recognizes that workplace harassment can occur not only in person but also through digital and virtual means. In accordance with OSHA, harassment that occurs virtually by using information and communications technology is prohibited.

Virtual harassment includes, but is not limited to, inappropriate or unwelcome conduct, comment, or communication delivered via emails, text messages, chat platforms, video calls, social media, or other electronic mediums that occurs in the course of employment and impacts a worker's dignity or psychological safety.

All workers are expected to conduct themselves respectfully in all virtual and electronic communications. Harassment or discrimination conducted through any digital platform will be treated with the same seriousness as in-person incidents and will be subject to the full investigation and corrective actions under this Policy.

Workers who experience or witness virtual harassment are encouraged to report such incidents promptly through the designated reporting channels without fear of retaliation.

"Domestic Violence"

FOSTER will do everything reasonable to protect employees from domestic violence that could lead to physical injury in the workplace. This may include restricting access to the workplace, providing security escorts, removing the employee's contact information from external sources, and relocating the employee's workspace to a secure area.

If an employee knows about domestic violence that could put any employee in danger, they should speak with their manager or HR right away.

"History of Violent Behavior"

FOSTER will let employees know if they are expected to encounter someone with a history of violence which could potentially harm them in the workplace. We will take every reasonable precaution to protect employees from that person, including changing their workspace or taking other necessary actions.

Responsibilities of Management

Managers who learn of any discrimination, harassment or violence, even if no formal complaint has been made, must inform their own manager or Human Resources. Managers who have the authority to prevent or discourage discrimination, violence, or harassment may be held responsible for not acting.

This policy does not limit or restrict reasonable management activities in the workplace. Reasonable actions taken by managers related to managing and directing employees or the workplace are not workplace harassment.

Emergency Response

If there is an act of violence in the workplace that requires an immediate response, employees should move to a safe location, contact their manager immediately, and if necessary, call 911

What to do in cases of Discrimination, Violence or Harassment

If you experience discrimination, harassment, violence, the threat of violence, or domestic violence in the workplace or if you witness someone else being subjected to these behaviours. Here are the steps to take:

1. If you feel comfortable, tell the person their behaviour is unwelcome and unacceptable.
2. Write down what happened, including the date, time, place, and details of what was said and done, names of possible witnesses, and any surrounding circumstances.
3. Report the incident to Management or Human Resources.
4. Cooperate with the investigation.

Discrimination, harassment, and violence are serious matters, and FOSTER will investigate complaints and take corrective action if necessary.

Investigation of Complaints

Any manager who receives a complaint or any employee who becomes aware of an incident of workplace discrimination, harassment, or violence must immediately inform Management or Human Resources. Management or Human Resources will be responsible for overseeing the complaint process.

Upon receiving a complaint, Management, Human Resources, or their designate (the “Investigator”) will investigate that is appropriate and thorough given the circumstances.

At the conclusion of the investigation, the Investigator will determine one of the following outcomes:

1. The complaint was substantiated.
2. The parties involved voluntarily resolved the matter to the satisfaction of the individual and Management.
3. The complaint was not substantiated.

For every investigation, FOSTER will inform the employee who filed the complaint, in writing, of the investigation’s findings and any corrective actions that have been or will be taken.

If corrective action is warranted, the range of possible measures may include a formal apology, referral to appropriate warnings, reassignment, temporary suspension without pay, demotion, or termination. The nature of the disciplinary action will correspond to the severity of the offence and any prior related incidents.

Non-Retaliation Protection

Retaliation against anyone reporting alleged discrimination, harassment, or violence will not be tolerated. Likewise, deliberately making false accusations or misusing this Policy may result in disciplinary action, up to and including termination.

Where a complaint is substantiated, the Investigator will recommend proactive measures to prevent similar incidents in the future.

Confidentiality and Cooperation

All parties involved in the resolution or investigation of a complaint—including the complainant, the alleged offender, and any witnesses—are expected to cooperate fully and maintain confidentiality throughout the process.

All documentation related to the complaint, including any final investigation report, will be kept confidential and stored separately in personnel files. If disciplinary action is taken, both the reason for the discipline and the disciplinary measures will be recorded in the employee's personnel file.

FOSTER takes all complaints seriously and will make every reasonable effort to handle each matter with discretion, sensitivity, and promptness. While confidentiality will be maintained to the greatest extent possible, there may be legal obligations under OHSA or practical necessities of the investigation that require limited and discrete communications to effectively resolve the complaint.

Additional Resources

Workers seeking help to address workplace harassment have access to additional resources beyond FOSTER's internal procedures, including:

- **Joint Health and Safety Committee:** FOSTER's Joint Health and Safety Committee (JHSC) provides guidance and support on workplace harassment and health and safety matters. Workers are encouraged to contact any JHSC member for assistance.
- **Human Rights Legal Support Centre:** Provides free legal assistance for human rights matters. Contact: (416) 597-4900 or toll-free 1-866-625-5179
- **External legal counsel or union representative:** Workers may seek independent legal advice or representation as they deem appropriate

WORKPLACE VIOLENCE PREVENTION PLAN

This is FOSTER's Workplace Violence Prevention Plan, which will be reviewed annually. The purpose of this Plan is to identify and minimize the risk of violence in our workplace.

Risk Management

FOSTER commits to conducting a thorough workplace violence risk assessment. This assessment will identify areas and positions with potential violence risks and evaluate the degree of those risks. Consideration will be given to any past incidents within FOSTER and similar organizations.

Based on the assessment findings, FOSTER will implement protective measures tailored to safeguard employees in higher-risk roles.

The results of the risk assessment will be communicated to the Joint Health and Safety Committee (JHSC) Representative, and they will be provided a copy of any written assessment developed by FOSTER.

FOSTER will strive proactively to identify potential sources of workplace violence and will take appropriate steps to manage or eliminate associated risks.

Risk assessments will be reviewed and updated as often as necessary to ensure FOSTER's policies and programs effectively protect all employees.

Acknowledgement

I confirm that I have read, understood, and agree to follow the Foster Anti-Harassment Policy.

Signature

Name

Date