

WORKPLACE HARASSMENT PROGRAM



Further to the Solar Group Inc. workplace violence, harassment and discrimination policy, this program has been established in order to provide information and direction in regard to the following:

Reporting An Incident: How to report workplace harassment;

Process Involved In An Investigation: The procedural steps involved in an investigation into allegations of workplace harassment; and

Rights & Obligations of the Workplace Parties: What is expected of the workplace parties in a report and during an investigation.

What is Workplace Harassment?

- **Workplace Harassment** is 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, and includes discrimination and workplace sexual harassment.
- **Workplace sexual harassment** is engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or is also making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably know that the solicitation/advance is unwelcome.

How to Report an Incident of Workplace Harassment?

Reporting Obligations

- Reporting workplace harassment can be done in writing or verbally.
- The “**Workplace Harassment Reporting Form**” located at the end of this Program is to be used to make written and verbal reports (transposed from verbal into writing using the Reporting Form).
- Solar Group Inc. requests that the “Reporting Form” be completed as soon as possible after experiencing or witnessing an incident of Workplace Harassment. Include all information and details about the alleged harasser, the situation, and who is involved. Include any supporting documents/evidence (text messages, emails, photos, notes, etc.), if available
- In cases where the alleged harasser is a direct superior/member of management of the workplace party alleging Workplace Harassment, the Company permits reporting to the JHSC worker co-chair. Solar Group Inc. requires the JHSC member to ensure the Reporting Form is completed in regard to such an allegation.

What is the Investigation Process?

The Investigation

- An investigation into the alleged incident of Workplace Harassment will occur in a timely manner by management and/or human resources, as appropriate.
- The type of investigation conducted will be that which is appropriate in the circumstances.
- If the Workplace Harassment incident or report involves a Supervisor or member of Management, an arm's length, impartial, qualified person, will conduct the investigation.
- The investigation will be completed in a timely manner, and in most cases within 90 days or less, unless extenuating circumstances exist.
- If required, arrangements will be made to ensure the separation of the workplace party who brought the report (any witnesses) and the alleged harasser as the investigation occurs.
- The investigator will interview all relevant parties. The alleged harasser will be given an opportunity to reply to the allegations.
- The investigator will review the Workplace Harassment Reporting Form and any relevant documents, and take notes and statements during the interviews.
- The investigator will keep a document summarising the steps taken during the investigation, the contents of the Workplace Harassment Reporting Form, the allegation of the worker who allegedly experienced the workplace harassment, the response from the alleged harasser, and evidence of any witness.

Confidentiality

- The investigation must come to a conclusion (Findings/Results) about whether workplace harassment occurred or not. For reasons of privacy and confidentiality, the findings/results are not provided to the JHSC.
- Confidentiality will be maintained by the investigator to protect workers except as necessary to investigate the allegations, to take corrective actions, or otherwise required by law. Witnesses or parties to the incident will be reminded of their obligations with regard to confidentiality, including not discussing the alleged events with other witnesses.

Results of an Investigation into Allegations of Workplace Harassment

- The findings and/or results of the investigation into the allegations of workplace harassment will be provided in writing to the worker who made the allegations and the alleged harasser within 10 days of the conclusion of the investigation.
- If corrective actions are warranted, those will be set out in the results. Corrective actions may include a formal apology, verbal or written warning, requirement to attend related training, suspension or termination of employment, or legal action.

Record Keeping

- Records of the investigation will be kept confidential for at least 2 years following the investigation.

Bad Faith Allegations/Accusations of Workplace Harassment

- If an investigation reveals that false accusations of workplace harassment were knowingly or maliciously made, the appropriate workplace party will be subject to disciplinary action, up to and including termination of employment.
- A complaint submitted in good faith, even where the allegation is not found, will not have been deemed to be in violation of this policy and program.

No Reprisal

- The workplace party to report and/or participate in an investigation into workplace harassment will not be penalized (reprised against) as a result of reporting the incident.
- Reprisals will not be tolerated and disciplinary action will be taken against those who engage in such behaviour.

WORKPLACE HARASSMENT REPORTING FORM

- Ensure the “Reporting Form” provided below is completed as soon as practicable and provided to a supervisor/management and/or Human Resources for timely investigation.