Camp Fortune Harassment Policy

A. POLICY STATEMENT

Camp Fortune is committed to providing a safe and healthy workplace free from actual, attempted or threatened harassment. Camp Fortune recognizes that workplace harassment is a health and safety and human resources issue and will take reasonable precautions to prevent workplace harassment and to protect employees at the workplace.

Definition of harassment and violence

The *Canada Labour Code* (the Code) defines harassment and violence at subsection 122(1) as “any action, conduct or comment, including of a sexual nature that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.”

B. PURPOSE OF WORKPLACE HARASSMENT POLICY

This policy is intended to:

1. Create and foster a work environment free from workplace harassment.
2. Provide a definition of workplace harassment.
3. Establish and detail the responsibilities of all persons in the Company workplace(s) to maintain a workplace free of actual, attempted or threatened harassment;
4. Ensure that incidents of workplace harassment are reported to Company management and/or law enforcement as appropriate;
5. Ensure that complaints of workplace harassment are handled in a timely and equitable manner by the Company.

C. SCOPE AND APPLICATION OF POLICY

This policy applies to all Camp Fortune employees regardless of position. This policy also applies to all persons who attend Camp Fortune workplace, including, but not limited to, all visitors, contractors, vendors and delivery persons.

For the purposes of this policy, Camp Fortune workplace includes all places where Camp Fortune business occurs and includes all:

- Company buildings (whether owned or leased) and the surrounding perimeter, including;
- Parking lots, sidewalks, and driveways (“Camp Fortune Grounds”);
- Camp Fortune vehicles;
- Off-site locations where Camp Fortune business occurs;
- Camp Fortune sponsored functions and recreational or social events, whether taking place on
- Camp Fortune grounds or elsewhere; and
- Travel for Camp Fortune business.

D. WORKPLACE HARASSMENT DEFINED

Harassment can include, but is not limited to, any of the following acts or attempted acts:

- spreading rumours or gossip about an individual or group;
- cyberbullying (threatening, spreading rumours or talking negatively about an individual online);
- threats made over the phone, by email, or through any other medium to an employee, including from an (ex)partner or family member;
- making offensive jokes or remarks;
- playing unwanted practical jokes;
- socially excluding or isolating someone;
- stalking or inappropriately following a person;
- tampering with someone’s work equipment or personal belongings;
- vandalizing or hiding personal belongings or work equipment;
- impeding a person’s work in any deliberate way;
- persistently criticizing, undermining, belittling, demeaning or ridiculing a person;
- intruding on a person’s privacy;
- public ridicule or discipline;
- unwelcome physical contact;
- sexual innuendo or insinuation;
- unwanted and inappropriate invitations or requests, including those of a sexual nature;
- displaying offensive posters, cartoons, images or other visuals;
- making aggressive, threatening or rude gestures;
- misusing authority, including:
    - constantly changing work guidelines
    - restricting information

- setting impossible deadlines that lead to failure, and/or
- blocking applications for leave, training or promoting in an arbitrary manner.

- Engaging in any of the actions, conduct and comments outlined above against a person because of that person's:
  - race
  - national or ethnic origin
  - colour
  - religion
  - age
  - sex
  - sexual orientation
  - gender identity or expression
  - marital status
  - family status
  - genetic characteristics
  - disability, or
  - any of the other prohibited grounds that the ***Canadian Human Rights Act*** lists

Harassment is not any of the following:

- Consensual workplace banter and interactions (unless it includes hurtful remarks about others, especially if they pertain to any of the prohibited grounds listed above).
- Reasonable management action carried out in a fair way, such as day-to-day actions by a supervisor or manager related to:
  - performance
  - absenteeism
  - assignments
  - discipline, and
  - even dismissal (unless it is abusive or discriminatory)
- Every workplace disagreement, if a conflict is poorly handled or left unresolved, it can lead to harassment.

This is the Camp Fortune policy which addresses harassment, including conduct that is not covered by the definition of workplace violence but that demeans, embarrasses, humiliates or is known, or ought to be known to be unwelcome.

E. ZERO TOLERANCE

The Company values the health and safety of its employees and expects that its workplace(s) will be free of workplace harassment. Camp Fortune will not tolerate incidents of workplace harassment perpetrated against or by any employee, customer, vendor, contractor, visitor or any other person at Camp Fortune's workplace or involved in Camp Fortune's business.

Every person at the Camp Fortune workplace is responsible for acting in compliance with this policy.

With respect to acts of workplace harassment, as defined in this policy, Camp Fortune may, where appropriate:

- Remove the perpetrator from the Camp Fortune workplace by security (Internal committee member) or the police;
- Discipline any employee, up to and including dismissal, and/or report the conduct to the police; and
- Report the conduct of any other person to their employer, supervisor and/or director and/or to the police.

All physical assaults involving an employee or occurring at Camp Fortune workplace will be reported to the police. All other incidents or threats of workplace harassment will be reported to the police as appropriate.

F. RESPONSIBILITIES AND OBLIGATIONS

It is the responsibility of:

1. Camp Fortune

- To take reasonable preventative measures to protect employees and others at Camp Fortune workplaces from workplace harassment;
- To ensure that a workplace harassment assessment is conducted;
- To develop procedures to address the workplace harassment risks identified in the harassment assessment;
- To ensure that all employees are informed of this policy;
- Have this policy available in each department in a conspicuous place in the workplace.

- To ensure that this policy is communicated to contractors and other persons who attend Camp Fortune workplaces;
- Has established a process for reporting and responding to incidents of workplace harassment.
- To ensure the process for reporting and responding to incidents of workplace harassment is communicated, maintained and followed; and
- Will ensure that this policy is reviewed at least annually.

2. Managers and Supervisors

- To understand and abide by the requirements of this policy;
- To communicate and review this policy with the employees they supervise or manage;
- To verify that all contractors and others who attend Camp Fortune workplaces are aware of this policy;
- To adequately train employees in Camp Fortune procedures that address the workplace harassment risk(s) applicable to the employee;
- To encourage employees to report complaints or incidents of workplace harassment;
- To respond to all complaints or incidents of workplace harassment in a professional manner appropriate for the circumstances of the complaint or incident;
- To promptly report all complaints or incidents of workplace harassment they receive or witness, to Jay Thompson as the mediator, Hannah Grant-Dallaire (in the absence of the mediator), with Erin Boucher and Peter Sudermann to address the issue.

3. Employees (Including Managers and Supervisors)

- To comply with this policy at all times to protect themselves and others in the workplace from workplace harassment;
- To immediately notify their supervisor or other designated person of any incident of workplace harassment, whether the notifying worker is the victim or not. In the case of an extreme or imminent threat of physical harm to themselves or any person from workplace harassment, the worker should contact the police.
- To participate in training regarding this policy and Camp Fortune procedures directed at workplace harassment risks in the workplace; and

- To fully cooperate in any investigation of complaints or incidents of workplace harassment or breaches of this policy.

G. DOMESTIC VIOLENCE

Any employee experiencing violence or harassment outside of the workplace (i.e. domestic violence) that may create a risk of danger to themselves or others in the workplace is encouraged to report such violence so that Camp Fortune can take reasonable preventive steps.

H. REPORTING AND INVESTIGATING WORKPLACE HARASSMENT

1. Reporting threats of workplace harassment:

- All incidents of workplace violence or reprisal must be immediately reported to the manager of the department where the issue has occurred, Jay Thompson as the mediator, Hannah Grant-Dallaire (in the absence of the mediator) with Erin Boucher and Peter Sudermann to address the issue.
- Any person subjected to workplace violence should, where appropriate, go to a safe location at the workplace and report the incident to their supervisor, a Camp Fortune supervisor/manager or Jay Thompson as the mediator, Hannah Grant-Dallaire (in the absence of the mediator) with Erin Boucher and Peter Sudermann to address the issue.
- All complaints and incidents are to be recorded in writing by the reporting person/employee, the supervisor or manager receiving the report. The date, time, location, potential witnesses and nature of the incident should be documented;
- If the police have not previously been summoned, management or a member of the Internal Committee will report all physical assaults to police. All other incidents or threats of workplace violence will be reported to the police as appropriate;

2. Investigation:

- All complaints or incidents of workplace violence or reprisal will be promptly investigated by the manager of the department where the issue has occurred, Jay Thompson, as the mediator, Hannah Grant-Dallaire (in the absence of the mediator), with Erin Boucher and Peter Sudermann to address the issue.
- Where the perpetrator is a Camp Fortune employee, the investigation will be conducted as quickly as possible and with confidentiality.
- The management or the Internal Committee investigation will include:

    - A documented interview with the complainant and/or victim;
    - A documented interview with the alleged perpetrator(s);
    - A documented interview with any witnesses with relevant information to provide; and
- Any other step the investigator(s) deem necessary to fully and fairly investigate the complaint or incident;
- At the conclusion of the investigation into an incident or complaint, the manager of the department where the issue has occurred will prepare a written report of the findings of fact and, after evaluating existing policies, procedures, physical premises and devices, employee training, and any suggestions to prevent a recurrence.
- Where the perpetrator is a Camp Fortune employee, the supervisor of the perpetrator, in consultation with senior management and/or the Internal Committee, will take any necessary disciplinary action. The severity of any disciplinary action, which may include dismissal from employment, will be consistent with the seriousness of the conduct at issue, such that more significant discipline will follow more serious conduct or repeated violations of this policy.

I. NO REPRISAL

Workplace violence and this policy are serious matters. This policy prohibits reprisals against employees who have made good faith complaints or provided information regarding a complaint or incident of workplace violence. Employees who engage in reprisals or threats of reprisals may be disciplined up to and including dismissal from employment.

Reprisal includes:

- Any act of retaliation that occurs because a person has complained of or provided information about an incident of workplace violence;
- Intentionally pressuring a person to ignore or not report an incident of workplace violence; and
- Intentionally pressuring a person to lie or provide less than full cooperation with an investigation of a complaint or incident of workplace violence.

An employee who makes a false complaint or otherwise abuses this policy may be disciplined up to and including dismissal from employment. Such discipline is not a reprisal or breach of this policy.

J. POLICY REVIEW

This policy will be reviewed at least annually.

I acknowledge having read the above Policy and understand its implications:

Jane, Chief Financial Officer	Erin Boucher, Director, Communications
Jay Thompson, Manager, Customer Services/HR	François Bernier, Director, Ski School
Gabriel Sudermann, Manager, Outdoor Operations	Rick Flowers, Director, Food and Beverage
Daniel Renault, Manager, Rental	Hannah Grant-Dallaire, Manager, Recreational Services
Todd Delaney, Manager, Boutique	Britney Amarica, Food and Beverage

Accordingly, I, Peter Sudermann, President of Camp Fortune, approve the Camp Fortune Harassment Policy to take effect immediately:

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Peter Sudermann, President, Camp Fortune

Je reconnais avoir lu la politique ci-dessus et comprendre ses implications :

I acknowledge that I have read the above policy and understand its implications:

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Updated: 11/25