

Workplace Harassment Policy

This Policy applies to all staff at Prodigy Ventures and its subsidiaries.

Prodigy Labs & Prodigy Ventures are committed to providing a work environment free of harassment and will make every reasonable effort to ensure that every employee is treated with respect and dignity.

Workplace harassment of any employee, worker, customer or supplier of Prodigy Labs and/or Prodigy Ventures will not be tolerated from any person in the workplace. This policy applies to all workers and addresses harassment from all sources, including but not limited to, customers, clients, employers, supervisors, workers and members of the public. Everyone at Prodigy Labs & Prodigy Ventures must be dedicated to preventing workplace harassment. Managers, supervisors, and workers are expected to uphold this policy, and will be held accountable by the employer.

Workplace Harassment is defined in the OHSAA as 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 workplace sexual harassment.

Any harassing of a fellow employee on the basis of race, ancestry, place of origin, color, ethnic origin, citizenship, creed (religion), sex, sexual orientation, gender expression, gender identity, age, marital status, family status, record of offences or disability, is strictly prohibited and is a dismissible offence.

Types of workplace harassment may include, but are not limited to, sexual harassment, teasing, intimidating or offensive jokes or innuendos, display or circulation of offensive pictures or materials, unwelcome and/or repeated words or actions that are known or should be known to be offensive, embarrassing, humiliating or demeaning to a worker or group of workers, offensive or intimidating phone calls or bullying. It can also include behaviour that intimidates, isolates or even discriminates against a worker or group of workers in the workplace that are unwelcome.

Note: Workplace harassment does not include a reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace

Sexual harassment includes any unwelcome conduct, comment, gesture or contact of a sexual nature which has the purpose, or the effect of creating a work environment that is intimidating, humiliating or uncomfortable; any implied or expressed condition or promise for complying with a sexually oriented request.

Sexual harassment may also include, but is not limited to:

- gender-related comments about an individual's physical characteristics or mannerisms;
- unwelcome physical contact;
- suggestive or offensive remarks or innuendoes about members of a specific gender;
- propositions of physical intimacy;
- offensive jokes or comments of a sexual nature about an employee, client, customer etc.;
- display of sexually offensive pictures, graffiti, or other materials;
- questions or discussions about sexual activities.

Procedure:

Any employee who feels that they have been subjected to harassment should:

1. Make it clear to the harasser that his or her actions are not welcome.
2. Prepare and maintain a written record of the dates, times, nature of the behaviour and witnesses (if any).
3. An incident or a complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.
4. Report any complaint involving harassment, outlining it confidentially either verbally or in writing to the manager, Human Resources, or any other member of management whom you wish.
5. The manager to whom the complaint is reported and Human Resources will, together, act as the investigating team, and will be responsible for reviewing the specific complaint, and establishing the facts.
6. The complainant and the person implicated in the complaint will be notified that an investigation has begun. Note that the name of the employee lodging the complaint and other circumstances related to the complaint will not be revealed to any other party, unless such disclosure is necessary for the purpose of investigating, taking disciplinary action with respect to the complaint, or if required by law. The appropriate interim

action will be recommended by the investigating team at this point and will be acted upon by the appropriate level of management.

7. The investigation will be completed in a timely manner and generally within ninety (90) days or less unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.
8. The investigation team will summarize their findings and reach a decision or recommended action(s). Written results of the investigation and suggested resolution of the situation will then be presented to the two parties within ten (10) days of the investigation being completed.

Note: Nothing in this policy precludes an individual's right to file a complaint with the Human Rights Commission should the employee feel that the situation warrants such action.

NO EMPLOYEE WILL BE SUBJECT TO ANY RECRIMINATION FOR REPORTING HARASSMENT.

Support

If a worker needs further assistance, they may contact the [Human Rights Legal Support Centre](#).

For additional support, employees with access to our Employee and Family Assistance Program, should reach out to Homewood Health. Register online at homeweb.ca (select Prodigy Labs as your employer) or by Phone at 1-800-663-1142.

Questions/Concerns/Suggestions

Please contact hr@prodigylabs.net to address any questions, concerns, or suggestions you may have.