



# Workplace Discrimination, Harassment, and Violence Policy

## What is the intent of this policy?

Keyera recognizes the dignity and worth of every worker and is committed to a healthy, harassment and violence free work environment. As part of this commitment, Keyera has developed a company-wide policy intended to prevent discrimination, harassment and violence in the workplace and to outline our approach to dealing quickly and effectively with any incident that might occur.

## How is this policy applied?

This policy applies to all workers and is intended to foster a working environment in which we all treat each other with mutual respect. It applies in any place where Keyera related business or work activities are conducted, including but not limited to:

- All Keyera work premises, including camp facilities and vehicles (whether owned, rented, leased or otherwise contracted by Keyera);
- Work assignments outside Keyera;
- Work-related travel, conferences or training sessions;
- Work-related social functions; and
- Other circumstances in which an individual is representing Keyera or could reasonably be seen as representing Keyera.

## What is discrimination?

Discrimination is the unfair or prejudicial treatment of different categories of people or things, particularly on the basis of race, age, or sex. Discrimination on the basis of race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation (commonly referred to as “protected grounds”) is prohibited under human rights laws.

## What is harassment?

Harassment is conduct or behavior that is known or ought reasonably to be known to be unwelcome and that:

- Creates or contributes to an intimidating, hostile or offensive work environment,
- Interferes with an individual’s work performance,
- Adversely affects a workers’ relationship with Keyera or co-workers, or
- Denies individual dignity and respect.

Harassment may be exhibited in many ways, including but not limited to verbal, physical or cyber conduct, comments, coercion, intimidation, ridicule, verbal or physical abuse, threats,

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blackmail, derogatory remarks, jokes, innuendo, insults or taunts. The conduct does not need to be intentional to constitute harassment.

### **Sexual harassment:**

Harassment includes sexual harassment. Sexual harassment may include unwanted sexual advances, unwanted requests for sexual favours and other unwanted or unsolicited verbal or physical conduct of a sexual or gender related nature (including touching, unwanted gestures of affection, leering, rough or vulgar humour, pictures or pornographic materials, comments, suggestions, innuendoes, gender-related insults or taunts, and requests or demands of a sexual nature). Overall, it is any unwelcome sexual or gender-based behaviour that adversely affects, or threatens to affect, directly or indirectly, a person's working conditions, job security or prospects for promotion or earnings.

## **What is violence?**

Violence means threatened, attempted or actual conduct of a person that causes or is likely to cause physical injury. Signs of workplace violence may include but are not limited to:

- Aggressive or menacing behavior;
- Using or threatening to use a weapon (or using or threatening to use a tool as a weapon);
- Prodding, poking, pushing;
- Throwing objects with the intent to threaten or injure; and
- Acts of sabotage with the intent threaten or injure.

## **How does Keyera prevent discrimination, harassment and violence?**

Keyera does not tolerate or condone workplace discrimination, harassment or violence. This means making everyone aware of what is not acceptable, investigating complaints and taking suitable corrective measures where warranted. Keyera is committed to addressing and resolving allegations of discrimination or harassment in a prompt, confidential and effective manner.

## **What are the responsibilities of employees and supervisors in preventing discrimination, harassment and violence?**

Everyone at Keyera has a role in maintaining a workplace free from discrimination, harassment and violence. All employees are expected to do their part by:

- Contributing to a work environment that is free of discrimination, harassment and violence;
- Refraining from engaging in behaviours that violate this policy;
- Participating in work site risk assessments; and
- Raising to the attention of their supervisor or the human resources department incidents of inappropriate behaviours contrary to this policy.

It is the responsibility of supervisors to take immediate and appropriate action to report or deal with incidents of discrimination, harassment or violence of any type, whether brought to their attention or personally observed. Under no circumstances should an incident be dismissed or downplayed, nor should any complainant be told to deal with it personally. Keyera's Legal Department and Human Resources Department are available to offer counsel to employees and supervisors on matters of discrimination, harassment or violence. In addition, employees and supervisors can access a confidential third-party wellness service (Employee and Family Assistance Program) for support with matters related to health and well-being.

## **What should I do if I am experiencing discrimination, harassment or violence?**

If you experience discrimination, harassment or violence you should take the following steps:

1. If it is safe to do so, tell the offending person that their behaviour is unwelcome and ask them to stop. It is important that the offending person is aware that his or her conduct is offensive.
2. Keep a record of incidents (date, times, locations, possible witnesses, what happened, your response). You do not have to have a record of events in order to make a complaint, but a record can assist in an investigation and help you remember details over time.
3. Report concerns. Depending on the circumstances, you have many options to bring concerns forward, including raising them with:
  - a. Your area or department supervisor or senior management;
  - b. Keyera's Human Resources Department or Legal Department; or
  - c. Confidential Anonymous Reporting for Employees (CARE) Hotline, which is available 24 hours a day, seven days a week and can be accessed by:  
Telephone at 1-855-424-CARE (2273)  
Email at [useCARE@ca.gt.com](mailto:useCARE@ca.gt.com)  
Secure website at [www.grantthorntonCARE.ca](http://www.grantthorntonCARE.ca)
4. You also have the right to contact the Alberta Human Rights Commission with respect to any discrimination or harassment on protected grounds.

## **What process does Keyera follow if there is a complaint of discrimination, harassment or violence?**

The following provides an overview of the typical process Keyera follows in the event of a complaint:

1. When a complaint is received, appropriate action will be undertaken immediately to look into the allegations. Complaints are treated in confidence, with only those people who need to know about the complaint being made aware of the concern.
2. As an initial step, Keyera may interview the complainant, as well as the alleged offender and any individuals who may be able to provide relevant information related to the allegations. All information collected through the interview process will be treated in confidence. (Note: If a complaint is submitted through the CARE

Hotline, the complainant will receive a request to share his or her identity in order to assist with this process, but if the complainant does not agree to provide his or her name, he or she will remain anonymous.)

3. If appropriate following the initial interviews, Keyera may attempt to resolve the complaint through a mediated dialogue. If this approach is not appropriate or is not successful, an investigation will be undertaken.
4. If the investigation reveals evidence to support the complaint, the offender will be disciplined appropriately. Discipline may include suspension or dismissal for cause, and the incident will be documented in the offender’s file.
5. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged offender.
6. No documentation will be placed on the complainant's file when the complaint has been made in good faith, whether or not there was a finding of evidence to support the complaint.
7. If it is determined that a complainant has brought forward a claim maliciously or in bad faith, the complainant will be disciplined appropriately. Discipline may include suspension or dismissal for cause, and the incident will be documented in the complainant's file.
8. Regardless of the outcome of a complaint made in good faith, the complainant, as well as anyone providing information, will be protected from any form of retaliation.

## Summary

Keyera seeks to provide a safe, healthy and rewarding work environment for workers, customers and service providers. Keyera does not tolerate discrimination, harassment or violence of any kind, whether or not related to protected grounds. If you have experienced workplace-related discrimination, harassment or violence, contact us. We want to hear from you.

<b>Workplace Discrimination, Harassment and Violence Policy</b>	<b>Effective date</b>	April 2004
	<b>Modified</b>	October 2018
	<b>Supersedes and replaces</b>	Corporate Guideline – Discrimination and Harassment, April 2004
		Corporate Guideline - Workplace Violence, July 2006
		Workplace Violence Procedure, August 2012
	<b>Author</b>	Workplace Violence Reporting Form
<b>Modified by</b>	Human Resources	
		Human Resources & Legal