



Policies and Regulations

PO-006

Harassment Policy

February 2019

Preamble

The purpose of this policy is to affirm SIRIUSMEDx' s commitment to isolated areas to prevent and stop any situation of psychological or sexual harassment within the company, including any form of discriminatory harassment. It also aims to establish the principles of intervention that are applied in the company when a harassment complaint is filed, or a situation of harassment is reported to the employer or his representative.

Application

This policy applies to all of the company's personnel and to anyone doing business with the company, including in the following locations and contexts:

- Workplaces
- Common areas
- Any other place where people must be in the context of their job (eg meetings, training, travel, social activities organized by the employer ...);
- Communications by any means, technological or otherwise.

Definition

The Act respecting labour standards defines psychological harassment as follows:

An oppressive conduct that manifests itself in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures that affect an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee. For greater clarity, psychological harassment includes such conduct when it manifests itself in such words, acts or gestures of a sexual nature.

A single serious misconduct may also constitute psychological harassment if it has brought such damage and produced a continuous harmful effect for the employee. »

The definition includes discriminatory harassment related to one of the grounds provided for in the Charter of Human Rights and Freedoms.

The notion of harassment must be distinguished from other situations such as interpersonal conflict, work-related stress, difficult professional constraints or the normal exercise of stewardship rights (management of the presence at work, organization of work, disciplinary measures, etc.).

Policy Statement

SIRIUSMEDx does not tolerate or admit any form of psychological or sexual harassment in his company, whether:

- By managers towards employees;
- Friends
- By employees to their superiors;
- From any person associated with it: representative, customer, user, supplier, visitor or other.

Any behaviour related to harassment may result in disciplinary action up to and including termination of employment.

SIRIUSMEDx undertakes to take reasonable means to:

- Provide a workplace free of all forms of harassment to protect the dignity and the psychological and physical integrity of individuals;
- Disseminate the policy in such a way as to make it accessible to all of its staff, by placing it on the intranet and making it available in each employee's notebook.
- Prevent or stop harassment situations by:
 - Putting in place a procedure for handling complaints and reports related to situations of psychological or sexual harassment,
 - Ensuring understanding and respect for the policy by all people,
 - Promoting respect between individuals

Expectations towards the staff

It is the responsibility of all staff to adopt a behaviour that promotes the maintenance of an environment free from psychological or sexual harassment.

Treatment of complaints and reports

Whenever possible, the person who believes that he or she is being harassed psychologically or sexually should first of all inform the person concerned that his / her behaviour is undesirable and that it must stop it. She should also note the date and details of the incidents as well as the steps she has taken to try to resolve the situation.

If this first intervention is not desired or if the harassment continues, the employee should report the situation to one of the responsible persons designated by the employer so that problem behaviours and the required means are identified.

A complaint may be made verbally or in writing. The alleged behaviour and details of incidents should be described as accurately as possible, so that an intervention can be carried out quickly to stop the situation.

The persons designated by the employer are as follows:

Carl Grondines, *director of clinical services*
514-509-2112 extension 31
cgrondines@siriusmed.com

Philippe-Olivier Belcourt, *coordinator*
514-509-2112 extension 34
pobelcourt@siriusmed.com

The person who witnesses a harassment situation is also invited to report it to one of the above-mentioned responsible persons.

Principles of interventions

SIRIUSMEDx is committed to:

- Take charge of the complaint or report as soon as possible;
- Preserve the dignity and privacy of those concerned, that is, the person who made the complaint, the person who is the subject of the complaint and the witnesses;
- Ensure that all concerned are treated with humanity, fairness and objectivity and that adequate support is provided;
- Protect the confidentiality of the intervention process, including information related to the complaint or report;
- Offer to the persons concerned to hold, with their agreement, a meeting with them in order to settle the situation;
- Conduct a prompt and objective investigation, as required, or assign responsibility to an external stakeholder. The persons concerned will be informed of the conclusion of this process. If the investigation does not establish that there were unacceptable behaviours, all material evidence will be retained for two years and subsequently destroyed;
- Take all reasonable steps to resolve the situation including, but not limited to, appropriate disciplinary action.

Anyone who has a breach of harassment policy, will be subject to appropriate disciplinary action. The choice of the applicable measure will consider the seriousness and consequences of the action(s) and the previous record of the person who posed them. A person who lays false charges for the purpose of causing harm is also subject to appropriate disciplinary action. In handling and resolving a workplace harassment situation, no one should be harmed or retaliated against by the employer.

Note concerning CNESST

A non-unionized person who believes that he or she has suffered psychological or sexual harassment in connection with his or her work may also file a complaint at any time directly with the Standards, Equity, Health and Safety Commission. (CNESST). The maximum time for doing so is two (2) years from the last harassment event. The complaint may be filed online

(<https://www.cnt.gouv.qc.ca/en/online-services/online-online-work-solutions/index.html>) or by phone at 1-844-838-0808. The choice of an employee to apply first to her employer will not have the effect of preventing her from filing a complaint with the CNESST.

Appendix 1 - Recognize psychological or sexual harassment

The Act respecting Labour standards gives criteria to determine what may be considered psychological or sexual harassment are:

- Vexatious conduct (offensive, humiliating ...);
- Which manifests itself repeatedly or in a single, serious act;
- In a hostile (aggressive, threatening) or unwanted way;
- Breaking the dignity or integrity of the person;
- Training, for this one, a harmful work environment (harmful, harmful).

These conditions include words, acts or gestures of a sexual nature.

Discrimination on any of the grounds listed in section 10 of the Charter of Human Rights and Freedoms may also constitute harassment: race, color, sex, pregnancy, orientation sex, marital status, age except to the extent permitted by law, religion, political beliefs, language, ethnic or national origin, social condition, disability or the use of a means to overcome this handicap.

For example, the following behaviors may be considered harassing conduct if they meet all the criteria of the law.

Behavior that may be related to psychological harassment

- Intimidation, cyberbullying, threats, isolation;
- Offensive or defamatory remarks or actions about a person or his work;
- Verbal abuse
- Depreciation

Behaviors that may be related to sexual harassment

- Any form of unwanted attention or unwanted advance with a sexual connotation, for example:
 - o Insistent solicitation;
 - o Glances, kisses or touching;
 - o Sexist insults, rude remarks;
- Words, jokes or images with sexual connotations by any means, technological or other.