

# WORKPLACE VIOLENCE PREVENTION POLICY

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## Purpose

The members of the iA Financial Group (the “Company”) strive to maintain a zero tolerance standard for violence in the workplace.

The Company’s objectives in implementing this policy are to:

- Help raise employee awareness and inform and educate them with a view to preventing violent behaviour in the workplace
- Promote open communication, prevention and prompt resolution of incidents involving violence
- Provide employees with the necessary support by setting up assistance and recourse mechanisms

## Who is Covered by This Policy?

This Policy applies to all employees of the Company who work in any Company workplace, whether at Head Office, a business office, with a member company, or at an agency office.

The Policy also applies to any relationship with people outside the Company in a work-related context (e.g. supplier, client, visitor, etc.).

## Definitions

**Complaint Resolution Process:** The complaint resolution process outlined in the Company’s Respectful Workplace Policy.

**Confidentiality Protocols:** The confidentiality protocols set out in the Company’s Respectful Workplace Policy.

**Threat:** The implication or expression of intent to inflict physical harm by words or actions, whether directly or indirectly, that a reasonable person would interpret as a threat to physical safety or property.

**Intimidation:** Directly or indirectly making others afraid for their physical safety through behaviour, including the use of

**Threats.** Workplace: For the purposes of this policy “Workplace” includes Company sponsored social events and Company business functions (such as conferences, seminars).

**Zero-tolerance:** A standard that establishes that any behaviour that violates the policy will not be tolerated and will be subject to discipline in accordance with this policy.

## Policy

The Company has a zero tolerance for Workplace Violence.

For the purposes of this policy, "Workplace Violence" means:

- The exercise of physical force by a person against an employee in the workplace that causes or could cause physical injury to the employee
- Any attempt to exercise physical force against an employee in the workplace that could cause physical injury to the employee
- A statement or behaviour that is reasonable for an employee to interpret as a threat to exercise physical force against the employee in the workplace that could cause physical injury to the employee

Workplace Violence may include, but is not limited to, the following behaviours against an employee:

- Verbal or written Threats or Intimidation
- Physical attacks such as hitting, pushing, shoving, kicking
- Physical restraint or confinement
- Possession of weapons of any kind in the workplace unless such possession or use is a Company authorized requirement of the job
- Physically dangerous or Threatening horseplay
- Commission of a violent felony or misdemeanor
- Any other act that a reasonable person would perceive as constituting Workplace Violence

## Role And Obligations Under this Policy

### Employees

- Be familiar with this Policy and emergency protocol procedures
- Be responsible for securing your own workplace
- Report strangers or unauthorized persons in the workplace to a Manager or Building Security or Human Resources
- Avoid confronting anyone who poses a threat of violence
- If it is safe to do so, ask the offender to stop. The action may be involuntary and pointing it out may resolve the problem
- Report incidents of violence to a manager or a Human Resources representative or a Policy Contact Person at all times

### Managers

- Be familiar with this Policy and emergency protocol procedures.
- Be responsible for securing your own workplace.
- Report strangers or unauthorized persons in the workplace to Building Security or Human Resources.
- Avoid confronting anyone who poses a threat of violence.
- When informed of any situation that violates this Policy, attempt to put an end to the conduct and intervene immediately with the people involved in your department if it is safe to do so. Advise a Policy Contact Person of any such situation.
- Be familiar with the Employee and Family Assistance Program and other Company resources so you can respond effectively to escalating threats.

### Policy contact persons

The Company has designated a Policy Contact Person ("Contact Person") for each of the Group's business offices. However, employees should feel free to contact any HR representative or manager, who can then notify the appropriate Contact Person if necessary:

- **Head Office, Manon Lemay**, Human Resources
- **Montreal Business Office, Jérôme Dubé**, Human Resources
- **Agency Administrative Personnel, Jérôme Dubé**, Agency Services
- **Toronto Business Office, Karen Dell'Anno**, Human Resources
- **Vancouver Business Office, Jeanette Guillermo**, Human Resources
- **Agency Sales Force, Norbert Crête**, Sales Career Section.

### **Policy committee**

Collectively, the Contact Persons form the Policy Committee (the “Committee”). More specifically, the role of the Policy Committee is to:

- Ensure that all Company employees are aware of and properly informed about the Policy and its scope
- Ensure that the Contact Persons from each business office are given appropriate training in order to avoid undesirable situations and maximize their intervention capacity
- Make appropriate recommendations about the content and application of the Policy

### **Review committee**

Two or more Contact Persons may be called upon to form a Review Committee to review a complaint under this Policy as described in the Complaint Resolution Process. A Contact Person may assign an appropriate delegate from Human Resources in his or her place if necessary. The role of the Review Committee is to:

- Review complaints that are referred to it
- Investigate reported situations, when necessary
- Establish a mediation process between the parties, where applicable
- Make appropriate recommendations and take any actions they determine are necessary arising out of their review of a complaint

From time to time, and based on Review Committee needs, an individual from the Group’s Legal Department may be asked to sit on the Review Committee formed to review a complaint.

## **Emergency Response Protocol – Violence in the Workplace**

If you encounter a situation involving imminent Workplace Violence or a threat of imminent Workplace Violence:

- Contact 911 and follow the instructions of the relevant authorities
- Move to a secure and safe area of the building or evacuate the building if it is safe to do so
- Contact Building Security
- Contact a Policy Contact Person, Human Resources or your supervisor
- Do not confront anyone who is violent or poses a threat of violence

## **Complaint Resolution Process**

If the situation is not one of immediate danger, and immediate intervention is not required, a complaint can proceed in accordance with the Complaint Resolution Process as described in the Company’s Respectful Workplace Policy:

- Retaliation against a person who makes a complaint under this Policy is prohibited.
- A complaint must be submitted as soon as possible after the action or incident upon which the complaint is based occurs. Delays in reporting or filing a complaint could interfere with the ability of the Contact Person or Review Committee to investigate the complaint.
- Whether or not a formal complaint has been filed, the Contact Person or the Review Committee may also launch an investigation if it has become aware of conduct that may violate this Policy.

## **Mitigating Measures**

Once the Company has determined that an incident of workplace violence has occurred, the Company will make all reasonable efforts to mitigate the incident. Mitigating actions will depend on the nature of each incident but may include one or more of the following:

- Notifying law enforcement authorities
- Contacting emergency assistance for injured employees
- Taking immediate steps to discipline an employee in accordance with this policy
- Offering the services of the Employee and Family Assistance Program
- Pursuing any other legal remedies the Company deems reasonable and necessary

## Disciplinary Measures and Sanctions

Depending on the seriousness of the offence and certain other factors, an employee that violates this policy will be subject to disciplinary measures or sanctions ranging from a simple reprimand to dismissal.

Complainants who file frivolous or vexatious complaints, or complaints made in bad faith, may also be subject to disciplinary measures ranging from a simple reprimand to dismissal.

## Training and Assistance Offered by the Company

- The Company will provide training on this Policy to employees as required under the laws of the applicable provincial jurisdiction.
- The Employee and Family Assistance Program is available for any employee who wishes to contact external services or resources to discuss a problem.

## Confidentiality

Every effort will be made to keep complaints confidential. However, ultimate responsibility for determining the resolution of a complaint lies with the Company, and where there is any risk to other employees, disclosure will be made to the extent necessary to remedy the situation.

Furthermore, disclosure may be made to appropriate authorities where required by law.

All parties – complainants, accused, managers, witnesses, Human Resources – are required to maintain confidentiality and to discuss the situation only with those involved in the investigation. A deliberate breach of confidentiality will be considered a breach of this Policy and subject to disciplinary action.

## Policy Review

This Policy will be reviewed annually and may be revised to ensure it continues to be effective.

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