



Workplace Harassment and Violence Prevention Policy

1. MISSION STATEMENT

Telesat Canada and its subsidiaries (collectively, "**Telesat**") are committed to providing a professional work environment that fosters respect and dignity for each Telesat employee. All employees have a right to a workplace free from harassment and violence. Telesat encourages respect for the self-esteem and dignity of employees and recognizes that individual well-being and productivity are best achieved in such a work environment. Harassment and violence in any form will not be tolerated.

This policy prohibits any harassment or violence by any employee of Telesat and is intended to prevent and respond to harassment and violence of any type, and effectively address any incident that might occur. Any person, including someone who is not a Telesat employee, who has been harassed or subjected to violence by a Telesat employee may initiate a complaint under this policy.

2. APPLICATION

- This policy applies to all employees and contractors at Telesat who are engaged in work, work-related activities or work-related relationships. It applies to employees and contractors both on company property and outside of company property.

This policy applies to all incidents of harassment and violence, including sexual harassment and sexual violence, family violence and third-party violence.

3. DEFINITIONS

The following definitions apply to this policy:

- **Designated recipient** means the work unit that has been designated by Telesat, to whom a notice of an occurrence may be submitted. For the purposes of this policy, Human Resources will act as the designated recipient.
- **Occurrence** means an occurrence of harassment and violence in the workplace
- **Principal party** means an employee or employer who is the object of an occurrence
- **Responding party** means the person who is alleged to have been responsible for the occurrence in a notice of an occurrence provided to the designated recipient
- **Witness** means a person who witnessed an occurrence of harassment and violence or is informed of an occurrence by the principal party or responding party

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- **Workplace** means any place where an employee is engaged in work for the employee's employer as per 122(1) of the Canada Labour Code (the "Code") including the following:
 - at employment-related social events;
 - in the course of work assignments outside the work place;
 - during work-related travel;
 - in remote work interactions, including remote home offices (if applicable).

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."

4. ROLES AND RESPONSIBILITIES

Role of Telesat, Policy Committee and Workplace Committee

The role of Telesat in relation to harassment and violence prevention includes:

- committing to preventing harassment and violence in the workplace;
- jointly with the policy committee:
 - review and, when necessary, updating this policy at least once every 3 years or following any change to an element of this policy;
 - conduct, monitor, make recommendations and, when necessary, update the workplace assessment every 3 years;
 - develop, review and, when necessary, updating the emergency procedures;
 - deploy the workplace emergency procedures whenever an incident poses an immediate danger to the health and safety of an employee or there is a threat of such an incident;
 - develop or identify, review and, when necessary, update harassment and violence prevention training at least once every 3 years and following any change to an element of the training; and
 - developing a list of investigators;
- and/or the workplace committee:
- making available to all employees information related to support services;

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- delivering harassment and violence training to all employees and the designated recipient;
- ensuring that the designated recipient correctly follows the resolution process that is outlined in the *Work Place Harassment and Violence Prevention Regulations* (the Regulations);
- for investigations into an occurrence of harassment and violence, providing a copy of the investigator's report to the principal party, responding party, and workplace committee;
- jointly determining with the workplace committee which recommendations from the investigator's report should be implemented and implementing the recommendations;
- ensuring the resolution process is completed within 1 year after the day on which a notice of an occurrence is received;
- reporting to the Labour Program employee deaths resulting from occurrences of harassment and violence, within 24 hours of becoming aware of the death;
- providing the Labour Program by March 1st of every year an annual report summarizing the data on all occurrences of harassment and violence in the previous calendar year; and
- complying with all other aspects of the Regulations and the Code as it relates to harassment and violence.

Role of Human Resources

Under this policy, Human Resources will act as the designated recipient. The role of Human Resources in relation to harassment and violence prevention at Telesat includes:

- responding to all notices of an occurrence within 7 days of receiving the notice;
- initiating negotiated resolution with the principal party within 45 days after the day on which the notice of an occurrence is received;
- reviewing every notice of an occurrence with the principal party against the definition of harassment and violence outlined in subsection 122(1) of the Code;
- making every reasonable effort to resolve an occurrence for which a notice has been provided;
- allowing the principal and responding parties the option of participating in conciliation if they both agree to participate and on who will facilitate the conciliation;

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- providing notice of an investigation to the principal and responding parties if the principal party requests an investigation;
- in the case of an investigation, selecting a person to act as an investigator from the list of investigators developed jointly by Telesat and the policy committee;
- ensuring selected investigators have the necessary knowledge, training and experience required by the Regulations and that the investigators provide a written statement indicating they are not in a conflict of interest with respect to the occurrence;
- providing investigators all the information that is relevant to their investigation; and
- providing monthly status updates to the principal and responding parties on the status of the resolution process.

Role of the workplace committee

The role of the workplace committee in relation to harassment and violence prevention at Telesat includes:

- implementing the preventive measures developed by the policy committee at the local workplace level;
- jointly reviewing and updating with Telesat the workplace assessment:
 - in situations where the principal party chooses to end the resolution process but the occurrence is not resolved, or
 - in situations where the responding party is not an employee or the employer (for example, clients, contractors, former partners);
- referring the results of the above reviews and updates to the policy committee where appropriate; and
- jointly determining with Telesat which of the investigator's recommendations from the investigator's report are appropriate to implement.

Role of Employees

The role of all employees in relation to harassment and violence prevention at Telesat include:

- recognizing and acknowledging that there is ZERO tolerance for disruptive behaviour or behaviours contributing to harassment or violence;
- behaving in a respectful manner consistent with this policy and the Code of

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Business Conduct and Ethics;

- where appropriate and safe, informing a person committing harassment or violence that their actions are inappropriate and unwelcomed;
- reporting any instances of real or perceived acts or threats of violence to their manager, Human Resources, and local law enforcement, as appropriate. Please see below for Telesat's commitment on confidentiality with regard to such reporting;
- avoiding or withdrawing from any real, potential or perceived harassment or violence situation;
- where appropriate, making every reasonable effort to resolve an occurrence of harassment or violence through negotiated resolution if they were a party to an occurrence;
- cooperating with an investigator and the investigation process related to an occurrence;
- refraining from retaliatory behaviour against the principal party, responding party, witnesses and any other individuals who are involved in the resolution process for an occurrence; and
- respecting the confidentiality of the information shared throughout the resolution process of an occurrence.

5. RISK FACTORS CONTRIBUTING TO WORK PLACE HARASSMENT AND VIOLENCE

There are a number of factors that can contribute to harassment and violence. These factors can be divided into 5 general categories:

- client characteristics
- physical work environment
- work activity/culture
- job factors, and
- other external factors

Client characteristics

Working with clients that exhibit certain characteristics can put employees at greater risk of harassment and violence. This can include working with clients, and their relatives, who may lash out at the closest person due to:

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- being angry and frustrated with the system
- having a history of violence
- a mental health condition, emotional disorder, or a head injury
- racist, sexist, homophobic, transphobic, ableist or otherwise discriminatory attitudes and behaviors
- being under the influence of drugs or alcohol

Physical work environment

Certain work environments and workplace designs can result in additional risks that may lead to harassment and violence. These can include:

- working alone, in small numbers or in isolated or low-traffic areas (for example, isolated reception area, washrooms, storage areas, utility rooms)
- working in community-based settings
- having a mobile workplace
- working in a poorly designed client area
- working in an overcrowded environment
- working in an environment with high noise levels

Work activity/culture

- working with the public
- working with volatile persons
- working during periods of intense organizational change

Job factors

Aspects specific to a job, such as mental and physical demands of the job, can result in additional hazards that may lead to harassment and violence. This can include:

- lack of control over how work is done
- excessive workload
- unreasonable or tight deadlines leading to high stress
- confusing, conflicting or unclear job or roles

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- ambiguous or complicated reporting structures
- lack of job security

Other external factors

Other external factors that can result in harassment and violence include:

- Family violence or domestic violence, such as a family member or (ex) partner:
 - threatening an employee or co-workers either verbally or over the phone or email
 - stalking the employee
 - verbally abusing the employee or co-workers
 - destroying the employee or organization's property
 - physically harming the employee or co-workers
 - using work time or workplace resources to monitor or attempt to control the actions of an (ex) partner

6. TRAINING

Telesat will provide all of its employees with harassment and violence training course. This course will cover:

- elements of the harassment and violence prevention policy;
- the relationship between harassment and violence and the prohibited grounds of discrimination under the *Canadian Human Rights Act*; and
- how to recognize, minimize and prevent harassment and violence.

All new employees will receive training within 3 months after the day on which their employment begins. Further, all employees will receive this training again at least once every 3 years.

Supervisors, managers, directors, and members of Human Resources will receive training on their obligations in relation to harassment and violence at least once every 3 years.

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7. RESOLUTION PROCESS

Outline of the resolution process

Below is a summary of the resolution process. It includes how a principal party, or witness, can submit a notice of an occurrence.

Notice of an occurrence

You are encouraged to notify Human Resources (the designated recipient) if:

- you are an employee who is experiencing or have experienced harassment and violence in the workplace, or
- you are an individual (employees or non-employees) who witnessed an occurrence of harassment and violence in the workplace

Notify Human Resources by email at: humanresources@telesat.com.

Human Resources will ask the employee or individual to provide the following information: (1) the name of the principal party and the responding party (if known); (2) the date of the occurrence; and (3) a detailed description of the occurrence.

If an employee or individual is not able to provide this information in written form, they may provide this information to Human Resources verbally. Human Resources will then transcribe the information for them in writing.

Telesat cannot reveal the identities of the parties involved in the resolution process for an occurrence to either the policy committee or workplace committee without the consent of the parties. However, the identities of the parties may be revealed to each other as part of the resolution process.

Negotiated resolution

Negotiated resolution is a form of informal resolution where the principal party meets with the employer or designated recipient to discuss the occurrence, clarify what was submitted in the notice of occurrence, and attempt to reach resolution.

During negotiated resolution, Human Resources will ask the principal party to meet, either in person or by phone, with a member from Human Resources. This meeting is for an initial discussion regarding the occurrence. During this discussion, the member of Human Resources and the principal party will review the notice of occurrence that they received against the definition of harassment and violence in the Code. Together, they will try to determine whether the occurrence meets the definition. If both the member of Human Resources and the principal party agree that the occurrence does not meet the definition, then they will deem the occurrence as resolved. If the member of Human Resources and the

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principal party do not agree as to whether the occurrence meets the definition, and the principal party wishes to continue with the resolution process, then the principal party has the option of either:

- continuing with negotiated resolution, or
- pursuing conciliation and/or an investigation

If the principal party wishes to continue with negotiated resolution, they must inform Human Resources of this decision. Human Resources will schedule a series of meetings with the principal party. At the meetings, where applicable, the responding party will discuss the occurrence and attempt to achieve resolution. The responding party does not have to be informed of the principal party's notice of occurrence or be involved at this stage of the resolution process. This is only if the principal party does not wish for them to be notified or involved. Human Resources can arrange for any of the following meetings:

- meetings with only the principal party and a member from Human Resources
- meetings with the principal party, responding party and a member from Human Resources
- meetings between the principal party and a member from Human Resources with concurrent but separate meetings between the responding party and a member from Human Resources

Conciliation

A principal party and responding party may engage in conciliation at any time during the resolution process. However, conciliation can only proceed if both the principal party and the responding party agree to engage in conciliation. They must also agree on the person who will facilitate the conciliation. **However, conciliation can only proceed if an investigator has not provided their final investigation report.**

The principal party and responding party are required to inform Human Resources of their desire to participate in conciliation. Human Resources will then facilitate discussion around the selection of a conciliator who is agreeable to both parties. Human Resources will also schedule time for both parties to meet with the conciliator.

Investigation

The principal party may request an investigation at any time during the resolution process. If the principal party wishes to proceed with an investigation, they must inform Human Resources. Human Resources will then provide notice of an

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investigation to the principal and responding party, and select an investigator from the list that has been jointly developed with the policy committee.

The selected investigator will investigate the occurrence and provide Telesat a report outlining a general description of the occurrence, their conclusion, and their recommendation to eliminate or minimize the risk of a similar occurrence.

Telesat will then provide a copy of this report to the principal party, responding party and the workplace committee. The report will not reveal, directly or indirectly, the identity of the persons who were involved in the occurrence or the resolution process for the occurrence. Telesat and the workplace committee will then meet to determine which of the recommendations in the investigator's report are to be implemented. Telesat will implement those recommendations within 1 year of receiving the notice of occurrence.

However, the section Recourse Avenues in this policy describes other recourse methods an employee can pursue.

Representation

At any time during the resolution process, an employee may be accompanied or represented by a friend, partner, colleague, or person of their choosing.

Protection against reprisal

Parties involved in an occurrence are prohibited from seeking retaliation. If you experience any retaliatory action or threat of retaliatory action from the responding party, witnesses, management, or other people within or outside the organization, please inform Human Resources immediately.

8. Privacy Protection

Telesat is committed to the protection of the privacy of the persons involved in an occurrence. As such, the policy committee and the workplace committee are not permitted any involvement in the resolution process of an occurrence. Only trained staff in Human Resources will engage in the resolution process with the principal party and responding party. Further, we will not permit an investigator to disclose in any report it produces and distributes the identity of any of the persons involved in an occurrence or the resolution process for an occurrence. This includes the principal party, responding party, witnesses and any other individuals interviewed by the investigator.

9. Recourse Avenues

Employees can pursue multiple recourse avenues for their occurrence in addition to the steps set out in this policy. This includes pursuing recourse under the *Canadian Human Rights Act* with the Canadian Human Rights Commission, or pursuing recourse under the *Criminal Code*.

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10. Support measures

For remote locations, employees can access a list of medical, psychological or other support services available within a 30km radius.

For Ottawa location:

Walk-in Clinics

Appletree Medical Group (SPARKS)

Address:

240 Sparks St. #C153
Ottawa, ON, K1A 0X8

Phone: (613) 482-0118

Fax: (613) 604-0277

Appletree Medical Group (PRESTON)

Address:

225 Preston St.
Ottawa, ON, K1R 7R1

Phone: (613) 482-0118

Fax: (613) 604-0277

Appletree Medical Group (RIDEAU)

Address:

541 Rideau St.
Ottawa, ON, K1N 5Z7

Phone: (613) 482-0118

Fax: (613) 604-0277

Hospitals

The General Hospital

Address:

501 Smyth Rd,
Ottawa, ON

K1H 8L6

Phone: (613) 722-7000

The Civic Hospital

Address:

1053 Carling Ave,
Ottawa, ON
K1Y 4E9

Phone: (613) 798-5555

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Montfort Hospital (FRENCH)

Address:

713 Montréal Rd,
Ottawa, ON
K1K 0T2

Phone: (613) 746-4621

Psychological Services

Canadian Mental Health (OTTAWA)

Address:

311 McArthur Ave 2nd Floor,
Ottawa, ON
K1L 8M3

Phone: (613) 737-7791

Canadian Mental Health (CHAMPLAIN EAST BRANCH)

Address:

329 Pitt Street,
Cornwall, ON
K6J 3R1

Phone: (613) 933-5845

For Alan Park location:

Walk-in Clinics

South Bruce Grey (DURHAM)

Address:

320 College Street
Durham, ON, N0G 1R0

Phone: (519) 369-2340

Fax: (519) 369-6180

South Bruce Grey (WALKERTON)

Address:

21 McGivern Street
Walkerton, ON, N0G 2V0

Phone: (519) 881-1220

Fax: (519) 881-0452

Hospitals

The Hanover Hospital

Address:

90 – 7th Avenue,
Hanover, ON
N4N 1N1

Phone: (519) 364-2340

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Psychological Services

Canadian Mental Health Association, Grey Bruce

Address:

1101 2nd Ave East,
Owen Sound, ON
N4K 2H7

Phone: (519) 371-3642

Other offices should establish a list of available services ahead of time. Human Resources can assist in providing suitable services.

There is also a National "Mental Health Help" hotline at 1-833-456-4566.

Supports and resources related to family violence are available at [Ending Violence Canada - Support Services](#).

11. Emergency procedures

If a harassment or violence occurrence poses an immediate danger to the health and safety of an employee, or if there is a threat of such an occurrence, please contact local law enforcement or call 911 for emergency services (police, fire and ambulance). Employees can also contact the Employee Assistance Program (EAP) at 1-(844) 880-9142 or workhealthlife.com.

12. WORKPLACE ASSESSMENT

Human Resources and the workplace committee will conduct a joint review. If necessary, they will update the workplace assessment if an employee submits a notice of an occurrence and the resolution process cannot proceed for any of the following reasons:

- the principal party chooses to end the resolution process at any point during the resolution process but the occurrence is not resolved
- the responding party is not an employee or the employer (for example, the responding party is a member of the public, a client, or an (ex)partner or family member)

The purpose of the review and update of the workplace assessment is to:

- determine what happened, taking into account the circumstances of the occurrence
- determine whether all risk factors have been appropriately identified

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- develop new preventive measures, if needed, to mitigate the risk of a similar occurrence

13. NOTICES SUBMITTED IN BAD FAITH

Notices of harassment and violence that are identified throughout the resolution process as having been made in bad faith may be subject to disciplinary action.

14. COMPLAINTS RELATED TO EMPLOYER NON-COMPLIANCE WITH THE CODE OR REGULATIONS

In accordance with section 127.1 of the Code or Regulations, if you, as an employee believe that there has been a contravention of the Code as it relates to an occurrence of harassment and violence, you may make either a verbal or a written complaint to your supervisor or to the Global Human Resources Manager or the Head of Human Resources. You can reach at humanresources@telesat.com.