
Subject: Harassment and Bullying-Free Workplace

Ownership: Company President

Updated: June 2023

Policy Number: 201C

PURPOSE

Sodexo is committed to providing its' employees with a workplace that is safe, comfortable and free from bullying and harassment. It is the Company's policy to prohibit all forms of bullying or harassment at work. This includes harassment based on a person's race, ancestry, place of origin, color, ethnic origin, citizenship, creed, sex, sexual orientation, age, family status, or disability/handicap. Workplace harassment will not be tolerated from any person in the workplace. Everyone in the workplace must be dedicated to preventing workplace harassment.

SCOPE

All Canadian Employees

RESPONSIBILITIES

It is the responsibility of management to communicate Sodexo's Harassment and Bullying Free Workplace Policy to all employees. All employees are responsible for complying with Sodexo's Bullying & Harassment Free Workplace Policy. All employees must read the policy carefully and all salaried employees must sign the Employee Pledge form.

In case of concerns about violence in the workplace, consult the policy on *Workplace Violence Prevention*. For more specific question regarding violence at work, please contact your Human Resources representative.

DEFINITIONS

Workplace harassment is defined engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Harassment can take place between:

- an employee and a manager or supervisor;
- co-workers; or
- An employee and another person in the workplace, for example a customer or client, vendors, guests, patients, residents, students, etc.

Some of the types of harassment that workers could experience in the workplace include, but are not limited to:

- psychological harassment or personal harassment
- sexual harassment
- teasing, intimidating or offensive jokes or innuendoes
- display or circulation of offensive pictures or materials
- unwelcome, offensive, or intimidating phone calls
- leering
- unwelcome gifts or attention
- offensive gestures
- spreading rumors

Psychological harassment refers to any vexatious behavior taking the form of repeated, hostile and unwanted conduct, comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that result in a harmful work environment.

Bullying is defined as any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but excludes any reasonable action(s) taken by the Company or supervisor relating to the management and direction of employees. Bullying is to be addressed personally at first whenever possible to ensure that the person displaying the behavior is aware that their comments or actions could have been offensive or degrading or humiliating.

Behavior that humiliates or intimidates

Examples might include:

- Verbal aggression or name-calling
- Vandalizing personal belongings
- Sabotaging work
- Spreading malicious rumours
- Humiliating initiation practices / hazing
- Personal attacks
- Aggressive / threatening gestures
- Cyber-bullying

Can come from co-workers, supervisors, employers, external sources and repeated occurrences are not required to constitute bullying and harassment.

Sexual Harassment is defined as unwelcome sexual advances, requests for sex (with or without related threats or promises of favors or other benefits), or other verbal or physical sexual conduct which could have a harmful effect on an employee's work performance or which may create a hostile or offensive work environment.

Examples of "sexual harassment" include but are not limited to:

- "off-color" language or "dirty" jokes of a sexual nature;
- obscene or sexually suggestive comments about a person's body;
- slur, threats, repeated comments or other offensive verbal or physical conduct relating to a person's sex or sexual orientation;
- offensive or unwelcome sexual flirtations, advances or propositions, communicated verbally or in writing;
- playing sexually suggestive music;
- use of sexually degrading words to describe a person or a group of people;
- any display of sexually explicit photographs, drawings, greeting cards, articles, books, magazines or other printed items;
- Repeated unwelcome or unnecessary touching of any part of another person's body.

Worker Responsibilities:

- Report if they observe or experience bullying and harassment
- Not engage in workplace bullying and harassment
- Apply and comply with workplace policies and procedures on bullying and harassment

Supervisor Responsibilities

Take necessary and practical steps to stop bullying immediately when witnessed (and document and report the occurrence to Unit Management for investigation and follow-up)

Not engage in bullying and harassment

Apply and comply with workplace policies and procedures on bullying and harassment

Employer Responsibilities:

Draft a workplace policy statement

Take steps to Prevent or minimize bullying and harassment (Meetings; info sessions)

Develop reporting procedures

Develop procedures for dealing with / investigating incidents or complaints

Train workers and supervisors

REPORTING PROCEDURE

An employee who believes that they are the victim of bullying & harassment at work should immediately bring their concerns to their manager's attention. There shall be no negative consequences for reports made in good faith, including retaliation in any way from a manager, supervisor, or coworker.

If the unwelcome behavior involves a manager or supervisor to whom they report either directly or indirectly, they may seek assistance from any manager or supervisor with whom they feel comfortable discussing the situation. The employee may also seek assistance by contacting the Sodexo Abuse Hotline at **1-800-422-7358**.

The employee will be required to complete a written statement of their complaint. Employees are encouraged to make written notes about the alleged incident as soon as possible after it occurs. Details to record include, but are not limited to: date, time, location, witnesses present, spoken words, physical behaviors, reactions.

All complaints of alleged bullying & harassment must be reported to Human Resources for investigation.

INVESTIGATION PROCEDURE

The Company will investigate and deal with all concerns, complaints, or alleged incidents of workplace bullying & harassment in a fair and timely manner. This may include interviews with all persons having direct knowledge of the unwelcome behavior, including the person who made the complaint, the person accused of sexual harassment, and other potential witnesses. Throughout the course of the investigation, the privacy of all parties will, to the extent possible, be kept confidential.

If the investigation reveals that the complaint is valid, appropriate corrective action will be taken to prevent the bullying or harassment from occurring again, up to and including the discharge of any employees believed to be guilty of harassment.

At the conclusion of its investigation, the Company will review the findings with the employee who made the complaint. The employee who was allegedly harassed will be provided the results of the workplace harassment investigation in writing along with any corrective action that has been or that will be taken as a result of the investigation. This information will also be provided to the alleged harasser. Any other recommendations will be shared with the appropriate parties.

Employees who are found to be abusing or misusing this policy may be subject to disciplinary action.

Subject: Harassment and Bullying-Free

Workplace - **Province of Manitoba Specific**

Ownership: Company President

Requirements

Policy Number: 201C

Updated: June 2023

In addition to the responsibilities and obligations noted under Policy 201C- “Harassment and Bullying-Free Workplace”, the following statements are now included in Sodexo’s national policy and are specific to the Province of Manitoba. A copy of this additional policy language is to be posted within all worksites within the Province of Manitoba.

The following is being implemented in accordance with Manitoba Workplace Health & Safety Regulations s. 10.2 (1).

Therefore, let it be clear:

- Every worker at a Sodexo worksite is entitled to a work free of harassment;
- Sodexo will ensure, so far as practicably possible, that no worker is subjected to harassment in our workplaces;
- Sodexo will take corrective action respecting any person under our direction who subjects another worker to harassment;
- Sodexo will not disclose the name of a complainant or an alleged harasser or the circumstances related to the complaint to any person except where disclosure is
 - Necessary to investigate the complaint or take corrective action with respect to the complaint, or
 - Required by law;
- Every worker has the right to file a complaint with the Manitoba Human Rights Commission;
- Sodexo’s harassment prevention policy is not intended to discourage or prevent the complainant from exercising any other legal rights pursuant to any other law.

JH&S Committee representative

Date

General Manager

Date

Local Manager

Date