



Transition Metals

TRANSITION METALS CORP.

WORKPLACE VIOLENCE AND HARASSMENT PREVENTION POLICY

Transition Metals is committed to providing a safe, healthy and supportive work environment by treating our employees and clients with respect, fairness and sensitivity.

Violence and harassment in the workplace can have devastating effects on employees' quality of life and organizational productivity.

Workplace Violence includes:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or,
- a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.

Workplace Harassment includes:

- engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome; or workplace sexual harassment.

Workplace Sexual Harassment includes:

- 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.

Purpose of the Policy:

This policy defines behaviour that constitutes workplace violence and harassment, and explains procedures for reporting and resolving such incidents. Transition Metals Corp is committed to providing a working environment free of violence and harassment by familiarizing all workplace

parties with the related terminology as well as their individual responsibilities for prevention and corrective action.

Policy Statement:

The Management and Board of Directors of Transition Metals Corp recognizes the potential for violence and harassment in the workplace. The Management and Board of Directors will therefore make every reasonable effort to identify all potential sources of such risk to eliminate or minimize them through our workplace violence and harassment prevention program. Transition Metals Corp will not tolerate any type of violence or harassment within the workplace or during work-related activities. The Company is committed to allotting whatever time, attention, authority and resources necessary to ensure a safe and healthy working environment for all employees and clients to whom we provide care.

Transition Metals Corp will take every reasonable precaution to protect an employee from physical injury if we become aware, or believe, that domestic violence is a risk.

Definitions Associated with Workplace Violence and Harassment:

- **Physical assault:** is any physical force or threat of physical force to create fear and control another person. Some examples include: hitting, blocking, shoving, choking, slapping or biting, or pulling hair; "caring" for the victim in an abusive way, threats of violence, and using a weapon or other objects to threaten, hurt or kill.
- **Sexual assault:** is any unwanted sexual act done by one person to another. Examples include: kissing or forcing/coercing the person into kissing; touching the person's body with or without clothes on; forcing/coercing the person to masturbate; sexual intercourse (anal or vaginal), penetrating with an object; causing bodily harm; removing or attempting to remove clothing; taking advantage of a position, trust or authority to get sex; and threatening to harm someone else if the person does not agree to do any of these things.
- **Threat (verbal or written):** is a communicated intent to inflict physical or other harm on any person or to property by some unlawful act. A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to do harm, for example, "I am going to make you pay for what you did to me." A conditional threat involves a condition, for example, "If you don't leave me alone you will regret it." Veiled threats usually involve body language or behaviours that leave little doubt in the mind of the victim that the perpetrator intends to harm.
- **Verbal/Emotional/Psychological abuse:** is a pattern of behaviour that makes someone feel worthless, flawed, unloved, or endangered. Like other forms of abuse, it is based on power and control. Examples include: swearing, put-downs/name calling over a period of time, labelling the victim in a derogatory way such stupid, crazy or irrational, acts of humiliation, extreme jealous behaviour, attacking the victim's self-esteem in other ways. It can also include harming pets and damaging property.
- **Workplace Bullying:** repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment (Salin, 2003)

Roles and Responsibilities of Workplace Parties

Employer:

- Ensure that measures and procedures in the violence and harassment prevention program are carried out. Hold management accountable for responding to and resolving complaints of violence.
- Ensure compliance by all who have a relationship with the organization, such as contractors, advisor, volunteers, etc.
- Integrate safe behaviour into day-to-day operations.
- Develop a reporting process for incidents of workplace violence and harassment.
- Investigate all reports or threats of violence/harassment in a prompt, objective and sensitive way.
- Take corrective action.
- Provide response measures.
- Facilitate medical attention and support for those involved directly or indirectly.
- Ensure any deaths or critical injuries are reported to a Ministry of Labour (MOL) inspector, the police (as required) and the Board of Directors. Send the report explaining the circumstances to all parties in writing within 48 hours of the occurrence. Include information and particulars prescribed by the Occupational Health and Safety Act and regulations.
- Ensure a report goes to WSIB of all accidents where a worker loses time from work, requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.

Employees:

- Understand and comply with the violence and harassment prevention policies and related procedures.
- Report all incidents or injuries of violence/harassment or threats of violence/harassment to Management or Chair of the Governance and Nomination Committee of the Board of Directors immediately.
- Contribute to risk assessments.
- Seek support when confronted with violence/harassment or threats of violence.
- Get medical attention.

Reporting and Investigation:

- Workers are to report all violence-related incidents or hazards to Management or the Chair of the Governance and Nomination Committee of the Board of Directors. This report can be made confidentially at the employee's request. However, sharing information to ensure the safety of others and prevent recurrence may be necessary (e.g., contents of a police report).
- The reporting worker may make the report confidentially without leaving a copy in the log, indicating the need for confidentiality.

- The person receiving the report investigates it and ensures that measures are taken to safeguard employees and curtail the violence or harassment. No report of workplace violence/harassment or risks of violence may be the basis of reprisal against the reporting employee.
- The employer reports all injuries to the MOL and WSIB as required by the Occupational Health and Safety Act and Workplace Safety and Insurance Act.

Response Procedures:

- A written or oral report of any workplace violence/harassment should be as descriptive as possible and identify any immediate hazards to himself/herself or others.
- Management reviews all incident reports, monitors trends and makes recommendations to the CEO or equivalent for prevention and enhancements to the workplace violence and harassment prevention program.
- The CEO or equivalent reviews reports of workplace violence/harassment and ensures that actions are taken.
- The managers or supervisors who investigate the reported incident are to warn all staff who might be affected about dangerous situations. They also tell the reporting employee about the outcome of the investigation to help minimize the chance of similar incidents.
- If a violent incident results in a critical injury to a worker, the incident or injury will be immediately reported to the MOL.

Support for employees affected by workplace violence:

Management will respond promptly, assess the situation and ensure that these interventions are followed:

- facilitation of medical attention;
- debriefing (by skilled professional);
- referrals to community agencies, treating practitioner and employee assistance program;
- completion of incident reports, WSIB reports, reports to MOL (critical injury or fatality);
- reporting to police (as required); and
- team debriefing.

Risk Assessment:

Management (with worker involvement) assesses workplace violence hazards in all jobs, and in the workplace as a whole. It reviews risk assessments annually, as well as when new jobs are created or job descriptions are changed substantially.

Accountability:

All workplace parties are accountable for complying with the policy, program, measures and procedures related to workplace violence.

Approved: _____ Date _____

