



## **Cielo Waste Solutions Corp. Respectful Workplace Policy**

### **Commitment to Support a Healthy Workplace Culture**

Cielo Waste Solutions Corp. (“Cielo” or “the Company”) is committed to building and promoting a safe working environment for its directors, officers, employees, and contractors (“Representatives”). In pursuit of this goal, Cielo does not condone and will not tolerate acts of violence, Harassment or Discrimination against or by any Cielo Representative.

While Cielo will take every reasonable precaution and implement measures to prevent violence, Harassment, and Discrimination of its Representatives, our Respectful Workplace Policy is not meant to hinder effective communications or to interfere with everyday interactions. Usually, Harassment can be distinguished from normal, mutually acceptable socializing and interactions in the workplace. It is important to remember, when acting reasonably, it is the perception of the receiver of the potentially offensive message be it spoken, a gesture, a picture or some other form of communication which may be deemed objectionable or unwelcome that determines whether a course of conduct is acceptable or not.

Cielo is committed to ensuring that its workplace is free of violence, Harassment, and Discrimination by:

- monitoring and regularly reviewing human resource policies and procedures to ensure the provision of equality in hiring, training, promotion and working conditions;
- recognizing the importance of accommodating persons with disabilities in a manner that respects their dignity;
- thoroughly investigating reported incidents of violence, Discrimination, and/or Harassment in an objective, sensitive, and timely manner with due regard to the confidentiality of all parties concerned;
- providing a fair and effective resolution of Harassment and Discrimination complaints;
- taking necessary action against those who are found in contravention of this Policy up to and including termination of employment or other contractual relationship; and
- providing support to those affected by violence, Harassment, and Discrimination to ensure their health and wellness.

### **Definitions**

"Protected Grounds". The *Human Rights Act* protects Cielo's employees from Discrimination and Harassment based on Protected Grounds. These grounds include a person's race, religious beliefs, colour, gender, physical and mental disability, marital status, age, ancestry, place of

origin, source of income, family status (including pregnancy) and sexual orientation.

"Discrimination" is differential treatment, whether intentional or not, on the basis of a protected ground, which has the effect of imposing burdens, obligations or disadvantages not imposed on others, or which withholds or limits access to opportunities, benefits and advantages that are available to others.

"Harassment" is a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome. Harassment can take many forms, including, but not limited to: (a) threats, intimidation or verbal abuse; (b) unwelcome remarks or jokes about subjects such as the person's race, religion, disability, age or other characteristics; (c) displaying sexist, racist or other offensive pictures or posters; (d) unnecessary physical contact, such as touching, patting, pinching and/or punching; (e) physical assault; (f) a sexual solicitation, advance or "Sexual Harassment"; and (g) retaliation in any form for having filed a complaint of Discrimination or having assisted in complaint proceedings. Legitimate management intervention, or exercise of authority, including performance appraisals, counselling, and discipline, is not Harassment.

"Sexual Harassment" is frequently more about the abuse of power than sex. It often occurs in situations where there is unequal power between the people involved and is an attempt by one person to assert power over the other. Persons flirting with each other or becoming involved in a romantic or sexual relationship are not harassing each other, as long as the relationship is consensual (which necessitates that one of the individuals is not in a position senior to or able to influence the working conditions of the other) and none of the elements of sexual Harassment, discussed above, are present. If one of the individuals changes her or his mind, and the other person persists in trying to continue the relationship, then the conduct can quickly become Harassment and would fall within the behaviour prohibited by this Policy.

### **Application of this Policy**

Cielo will not tolerate any form of violence, Harassment, or Discrimination. This commitment applies to all areas including training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions. Cielo recognizes that the workplace is no longer restricted to a Cielo office or facility and as such this Policy applies to any interaction between Representatives.

Cielo will ensure that all Representatives are trained and educated on violence, Harassment and Discrimination and that they are clear about the roles and responsibilities as well as this Policy and its procedures. In addition, a copy of this Policy will be posted and made available to all Representatives.

Managers are responsible for fostering a safe work environment, free of violence, Harassment and Discrimination. Managers must set an example for appropriate workplace behaviour and must deal with situations of Harassment immediately upon becoming aware of them, whether or not there has been a complaint. Immediately upon becoming aware of a reported act of violence or Harassment, the Manager must consult with Cielo Human Resources.

All Representatives have the responsibility to:

- treat each other with respect;
- report any instances of Harassment or Discrimination to the Human Resources Manager of Cielo where it is not resolved on an informal basis in accordance with the Respectful Workplace Complaint Procedure-- whether it was observed, happened to them personally, or if the problem was reported to them; and
- respect the confidentiality of anyone involved in a Harassment complaint.

### **Malicious and Frivolous Complaints**

Malicious and false complaints or providing false information about a complaint are considered a contravention of this Policy.

### **Retaliation**

Retaliation or threats of retaliation toward anyone involved in a complaint investigation is viewed as a violation of this Policy.

### **Policy Violations**

Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment or other contractual arrangement. Should a Representative be uncomfortable reporting a breach of this Policy to their Manager or the Human Resources Manager, a report must be made in accordance with the Cielo Whistleblower Policy.



## **Cielo Waste Solutions Corp. Respectful Workplace Complaint Procedure**

### **General**

Any person who experiences violence, Harassment or Discrimination or observed others experiencing violence, Harassment or Discrimination is encouraged to document details of the incident shortly after it has occurred, noting:

- the name of the parties involved;
- the date, time and location of the incident; and
- a description of the incident, including words and/or gestures; and the name(s) of witness(es) to the incident.

This information will help with any of the resolution methods described.

Representatives may choose to resolve Harassment issues informally or formally using the following methods below.

### **Informal Resolution between Representatives**

Representatives who feel they have been the target of offensive behaviour are encouraged as an initial step to raise their concern with the alleged offender either in person, by phone, or in writing. This step is *only* suggested if the Representative feels comfortable to do so. Cielo Human Resources can support the Representative to prepare for this conversation and can act as an informal mediator for both parties.

Often, the alleged offender may not be aware that their behaviour is unwelcome. A clear message to them may stop the behaviour. If the complaint is not resolved at this stage, Cielo requires its Representatives to initiate a formal complaint.

### **Formal Complaint**

Representatives may initiate the written complaint process at any time by submitting a written complaint to their manager or the Human Resources Manager.

Formal complaints should be made as soon as possible after the date of the alleged incident. Timely filing will allow for a proper investigation while the events are still fresh in the minds of witnesses and will ensure a timely resolution.

## **Confidentiality**

In any investigation, Cielo will not disclose the circumstances related to an incident of Discrimination, Harassment or violence or the names of the complainant, the person alleged to have committed the Discrimination, Harassment or violence, and any witnesses, except:

- where necessary to investigate the incident or take corrective action or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident;
- where necessary to inform Cielo Representatives of a specific or general threat of violence or potential violence; or
- as required by law.

Where it is necessary to inform Cielo Personnel of a specific or general threat of violence or potential violence, Cielo will disclose only the minimum amount of personal information that is necessary to inform Cielo Personnel of a specific or general threat of violence or potential violence.

All documentation involved in the complaint process, including the final report, will be maintained in confidence. In all instances, such documentation will be kept separate from personnel files. If there is disciplinary action, the reason for discipline, as well as the nature of the discipline will be recorded in a Representative's personnel file.

## **Formal Investigation**

In instances where a formal investigation is required, Cielo will appoint an investigator (either internal or external) to conduct a fact-finding investigation, informing the immediate supervisors of the complainant and offender.

All parties involved in the resolution or investigation of a complaint, including the complainant, the alleged offender, and witnesses, are expected to facilitate the process, co-operate and maintain confidentiality.

Once an investigator has been assigned the following steps will be completed:

- Investigation – The investigator will collect all relevant information and facts in respect of the incident. The complainant will be asked to provide and maintain all relevant information and facts including dates, times, places, names (including witnesses) and other details relating to the incident(s). The investigation will include, where appropriate, written statements outlining names, dates, times of the offence(s), the nature of the alleged Discrimination, Harassment or violence, any potential witnesses and the form of correction or redress sought through the complaint. The investigator will, with suitable sensitivity and the protection of the parties in mind, conduct individual interviews with all involved parties and document all discussions. The investigator will prepare a written report that documents all relevant information and facts in respect of the incident. All parties will keep confidential any information discussed.
- Legal Review – The investigator will compile a report. It will be reviewed by the Human Resources Manager and the Chief Legal Officer and Corporate Secretary and/or external counsel where directed by the Chief Executive Officer.

- Resolution – Once a decision has been reached, the results of the investigation will be communicated to the appropriate parties as soon as reasonably practicable.
- Implementation – Any measures or corrective actions that have been identified as a result of any investigation shall be implemented as soon as practicable. If there is insufficient evidence to substantiate the claim of Discrimination, Harassment or violence, the complainant and the respondent (if applicable) will be so informed. Those involved will also be informed that the documentation on the incident will be retained by the Human Resources Department on a separate confidential file (not on the individual's personnel file), and in the event that there are other claims of a similar nature in the future, the case may be reopened. Where there is sufficient evidence to substantiate the claim of Discrimination, Harassment or violence, Cielo will take appropriate disciplinary or other action, up to and including termination of employment or contractual relationship.