

Violence and Harassment Policy

PURPOSE

BOWEN is a business solutions company built on the belief that our people are our single most important resource. As such, BOWEN is committed to protecting the health and safety of all BOWEN workers, clients, visitors and the public by, among other things, implementing a Violence and Harassment Policy.

By having all BOWEN workers read, understand and comply with this policy, BOWEN endeavors to prevent incidents associated with workplace conflict, and to provide a healthy, harassment-free workplace where safety and productivity go hand in hand.

DEFINITIONS

"Violence", whether at a work site or work-related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence.

"Harassment" means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety, and includes: (a) conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and (b) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site.

POLICY STATEMENT

It is BOWEN's policy to control the risks of violence and harassment in the workplace by taking all reasonable and practical steps to eliminate or reduce these risks and by responding quickly and effectively to any incidents. BOWEN is committed to eliminating or, if that is not reasonably practicable, controlling the hazard of violence/harassment for our workers.

Employment with BOWEN requires acceptable and respectful behavior at all times that is not offensive or intimidating in nature. Examples of behavior by BOWEN Workers that will not be tolerated include but are not limited to the following:

1. Verbal, written or physical abuse or attacks.
2. Threats or threatening behavior.
3. Derogatory remarks or jokes, innuendo or taunts about any person's (BOWEN Worker, supplier, or customer or public) appearance, religious beliefs, color, place or origin, mental or physical disabilities, ancestry, marital status, family status, source of income or gender.
4. The display of pornographic, racist or offensive signs or images.

5. Practical jokes that result in awkwardness or embarrassment.
6. Unwelcome invitations or requests, whether indirect or explicit.
7. Sexual or other harassment also will not be tolerated and can include such things as pinching, patting, rubbing or leering, “dirty” jokes, pictures or pornographic materials, comments, suggestions, innuendos, requests or demands of a sexual nature

Unacceptable behavior is offensive and in many cases it intimidates others and the resulting fear or intimidation need not be intentional in order for the behavior to be considered violence or harassment.

Harassment can consist of a single incident or several incidents over a period of time.

BOWEN recognizes that harassing conduct may be perpetrated by someone of the same or opposite sex as the victim, at any level of employment, whether by a service provider, supervisor, colleague, co-worker, manager, subordinate or by a client.

Bowen will not discourage any employee from exercising their rights under the violence or harassment program.

Each BOWEN Worker has a duty to maintain his/her workplace free from harassment. BOWEN Workers must not engage in acts of violence or harassment nor be expected to endure acts of violence or harassment by others.

RESPONSIBILITIES

It is the responsibility of all managers, supervisors and BOWEN Workers to prevent the risks and incidents of violence and harassment in the work place. To take immediate and appropriate action to report and respond to incidents of violence and harassment of any type, whether brought to their attention or personally observed. Under no circumstances will a legitimate complaint be dismissed or downplayed nor will the complainant be told to deal with it personally. BOWEN will investigate any incidents of violence/harassment and take corrective action to address the incidents.

BOWEN has in place control measures to eliminate or, if that is not reasonably practicable, control the hazard of violence to workers. Control measures include, but are not limited to posted signage, restricted access to work areas, locked doors, keycards, building surveillance, alarms, lighting, background checks, emergency response procedures, and a working alone policy.

It is the responsibility of BOWEN to provide training on: (a) the recognition of violence and harassment, (b) the policies, procedures and workplace arrangements that the employer has developed and implemented to eliminate or control the hazards of violence and harassment, (c) the appropriate response to violence and harassment, including procedures for obtaining assistance, and (d) the procedures for reporting, investigating and documenting incidents of violence and harassment. These are provided within the Workplace Violence and Harassment policy.

STANDARD PROCEDURES

Procedures for Reporting Harassment

A BOWEN Worker who feels that they are being harassed, whether by a manager, supervisor, colleague, co-worker, customer or vendor, should immediately take the following steps:

1. Politely but firmly advise the offender that the behavior is unwelcome and ask them to stop.
2. Keep notes of the offending incident, including the date, a summary of your conversation with the offender, witnesses present, if any, as well as the offender's response(s). Attach a copy of these notes with any written reports to management.
3. If the harassment continues, or if you feel that it is impractical to speak directly with the offender, contact your supervisor or manager, whether at BOWEN or a client worksite. A complaint of harassment must be in writing.
4. Should the complaint involve your supervisor or manager, or when the offending behavior persists, contact the next level of supervisor, manager. If your complaint is at a client worksite and involves your client side supervisor or manager, contact BOWEN.
5. Upon receipt of a written complaint, a comprehensive investigation will be undertaken. Confidentiality will be maintained wherever possible.
6. If applicable, a BOWEN worker reporting an injury or adverse symptom resulting from an incident of violence or harassment is advised to consult a health professional of the worker's choice for treatment or referral.

Reporting

All incidents of violence and harassment, real or threatened, are considered serious and must be reported. The existing incident / accident reporting process and report forms will be used. Reporting BOWEN Workers must not fear criticism, loss of privacy, penalties or judgement.

Report the incident to one or more of the following individuals:

- Your immediate Supervisor
- The Operations Manager for the business unit
- The Vice President for the business unit
- The Human Resources Manager
- The President or Chief Operating Officer

For immediate assistance in severe cases report directly to the Emergency Response Line.

In all cases of reporting, the President must be notified immediately.

Investigations

Once a report is received, an investigation will be conducted immediately and appropriate and necessary actions taken to resolve the problem. The existing incident / accident investigation process will be used.

In the case of violence and/or harassment, the investigation and all results of it will be kept confidential and disclosed only on a “need to know” basis. Appropriately, action taken may include conciliation (to reach a solution that is acceptable to all participants). Discipline may include reprimand, suspension or dismissal, with or without notice.

Once the investigation has been completed all parties involved will be made aware of the findings and outcomes. This will be communicated by the investigator by way of a one-on-one meeting.

The commitment of each BOWEN Worker to act responsibly and respectfully is a necessary component of BOWEN's commitment to maintain a healthy work environment.

Policy Review

BOWEN is committed to maintaining up to date policies ensuring it is aligned with employment standards and Canadian legislation. The Workplace Violence and Harassment policy will be reviewed on the earliest of the following: (a) when an incident of violence or harassment occurs; (b) if the joint work site health and safety committee recommends a review of the plan; (c) every 3 years.