

INNER SPIRIT HOLDINGS LTD.

Workplace Discrimination and Harassment Policy

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Bullying, Discrimination, Harassment and Violence, including sexual harassment, are not acceptable or tolerated at Inner Spirit Holdings Ltd., any of its Affiliates, or Franchisees (collectively “Inner Spirit”). At Inner Spirit, we believe our workers are our greatest asset and they should all be treated fairly and respectfully. All Employees have a right to work in an environment that is free from bullying, discrimination, harassment, and violence. Every Complaint of bullying, discrimination, harassment, or violence will be investigated, and action will be taken to discipline the offending parties where appropriate.

Violations of this Policy will lead to disciplinary action, up to and including termination of employment for just cause.

Definitions:

1. **Bullying** is a pattern of negative behaviour aimed at a specific person or group, and can involve discrimination, harassment, or violence. Workplace bullying often involves rudeness, hostility, and intimidation.
2. **Clearview Connects** is Inner Spirit’s personalized platform where Complaints regarding bullying, discrimination, harassment, violence, or retaliation can be made confidentially. Clearview Connects can be contacted:
 - a. through the website at <http://www.clearviewconnects.com>,
 - b. by phone at 1 833 874 3642, or
 - c. by mail at P.O. Box 11017, Toronto, Ontario M1E 1N0.
3. **Discrimination** is any unwelcome or objectionable conduct, comment, display or behaviour directed at an Employee that:
 - a. Is made because of the 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, or sexual orientation of an individual; and
 - b. That detrimentally affects the work environment or leads to adverse job-related consequences for the Employee.
4. Examples of discrimination include, but are not limited to:
 - a. The use of racial slurs;

- b. Derogatory comments; or
 - c. The suspension or punishment of an Employee because of any of the characteristics outlined above in paragraph 3.
5. **Employer** means Inner Spirit Holdings Ltd., or any of its Affiliates or Franchisees.
6. **Harassment** is any objectionable conduct, comment or display that:
- a. Is directed at an Employee;
 - b. Is made because of the 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, or sexual orientation of an individual, or constitutes a threat to the health or safety of the Employee.
7. Examples of harassment include, but are not limited to:
- a. Derogatory remarks;
 - b. Offensive jokes;
 - c. The display or circulation of offensive printed or visual material; or
 - d. Offensive physical actions.
8. **Harassment is not** the reasonable conduct of an Employer or Supervisor, in respect of management of workers on a work site.
9. **Policy** means the Inner Spirit Holdings Ltd. Workplace Discrimination and Harassment Policy herein.
10. **Sexual Harassment** includes, but is not limited to, unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature such as uninvited touching, offensive comments or innuendos that have the purpose or effect of adversely impacting the Employee's work performance or job benefits, or creating an intimidating, hostile, or offensive working environment.
11. Examples of sexual harassment include, but are not limited to:
- a. When submission to the conduct is either an explicit or implicit term or condition of employment;

- b. When submission to or rejection of the conduct is used as a basis for an employment decision affecting the person rejecting or submitting to the conduct;
 - c. When the conduct has the purpose or effect of unreasonably interfering with an affected person's work performance or creating an intimidating, hostile, or offensive work environment; or
 - d. In third-party situations, the sexual interaction, conduct, or communications between others offends one individual.
12. **Violence** is the threatened, attempted, or actual conduct of a person that causes, or is likely to cause, physical or psychological injury or harm.

13. Examples of violence include, but are not limited to:

- a. Physical attack of aggression;
- b. Threatening behaviour;
- c. Verbal or written threats;
- d. Domestic violence; or
- e. Sexual violence.

14. Due to the serious nature of these Complaints, Inner Spirit reserves the right to unilaterally amend this Policy from time to time. Therefore, it is important to note that these definitions do not necessarily cover all forms of workplace bullying, discrimination, harassment, or violence. **If any individual is in doubt about whether an incident constitutes bullying, discrimination, harassment, or violence, contact a supervisor, human resource personnel, or senior management.**

Who does this apply to?

15. This Policy applies to all Employees, Management, Affiliates, Franchisees, and Inner Spirit Holdings Ltd. and prohibits bullying, discrimination, harassment, and violence as well as retaliation, regardless of who engages in it.

Where does this Policy apply?

16. The Employer will make every reasonable effort to ensure that no Employee is subject to bullying, discrimination, harassment, or violence at the workplace. Conduct prohibited by this

Policy is not acceptable in the workplace, or in any work-related setting outside the workplace, including business trips, meetings, and business-related social events. Conduct that occurs off duty shall be reviewed on a case by case basis by appropriate personnel when submitted via Clearview Connects.

Retaliation:

17. The Employer prohibits retaliation against any individual who reports an incident of workplace bullying, discrimination, harassment or violence, or who participates in any investigation. Retaliation against an individual for reporting bullying, discrimination, harassment or violence, or for participating in an investigation of a claim is a serious violation of this Policy and will be subject to disciplinary action up to and including termination.
18. Employees should report if any bullying, harassment, or violence is observed or experienced. All reports of bullying, discrimination, harassment, or violence are taken seriously by the Employer.

How to Report:

19. Complaints may be made to any Supervisor, Human Resources personnel, or Clearview Connects. The name of the Complainant will not be disclosed except where disclosure is necessary for the purposes of investigating the Complaint and/or taking disciplinary action. All Complaints will be filed with Clearview Connects.
20. The Employer encourages all Employees who believe they have been subject to bullying, discrimination, harassment, violence, or retaliation to clearly and firmly make it known to the accused that their conduct is objectionable and must stop. Where this cannot be done or is not successful, the Employer encourages the reporting of such incidents, regardless of the respondent's identity or position. Any individual who believes they have experienced conduct which is contrary to this Policy, or who have concerns, should file a written complaint with Clearview Connects before the conduct becomes severe or pervasive.
21. Early reporting and intervention are the most effective methods to resolve actual or perceived incidents of bullying, discrimination, harassment or violence. The Employer, and or Clearview

Connects, will try to resolve Complaints quickly and fairly to stop bullying, discrimination, harassment or violence.

22. Any Complaint of bullying, discrimination, harassment, or violence will be investigated quickly, thoroughly and impartially. The Employer, and or Clearview Connects, will notify the accused of the investigation. The investigation may include individual interviews with the parties involved, individuals who observed the alleged conduct, or individuals who have other relevant knowledge. During the investigation, the accused may be placed on paid leave. Following the conclusion of the investigation, the Employer, and or Clearview Connects, will inform the Complainant and the accused of the results of the investigation.

Results of Investigation

23. Where bullying, discrimination, harassment, violence, or retaliation has been found, the Employer will take appropriate corrective and/or disciplinary action.
24. **Corrective action** may include: training, referral to counselling, or monitoring.
25. **Disciplinary action** may include: a warning, reprimand, withholding of promotion or pay raise, demotion, reassignment, suspension without pay, or termination for cause.
26. Where bullying, discrimination, harassment, violence, or retaliation has not be found, no action will be taken against an Employee who has made a Complaint in good faith.
27. Where a Complaint of bullying, discrimination, harassment, violence, or retaliation is found to have been made fraudulently or maliciously, the Employee who made the Complaint may be subject to disciplinary action up to and including termination.
28. The Employer, and or Clearview Connects, will not disclose the identity of the Complainant, the accused, any witnesses, or the circumstances of the Complaint to anyone who is not directly involved in the investigation, except where disclosure is required by law.
29. If the circumstances warrant the Employer, and or Clearview Connects, may refer the matter to outside authorities.

A copy of this Policy will be provided to any Employee who asks and is posted at
www.innerspiritholdings.com

Inner Spirit Holdings Ltd.