



RESPECTFUL WORKPLACE POLICY

Revised: September 1, 2019

TABLE OF CONTENTS

1.0	PURPOSE, APPLICABILITY AND SCOPE.....	4
1.1	Purpose	4
1.2	Applicability.....	4
1.3	Scope	4
2.0	DEFINITIONS, ABBREVIATIONS AND ACRONYMS.....	4
2.1	Definitions.....	5
2.2	Abbreviations and Acronyms	6
3.0	RESPONSIBILITIES	6
3.1	Responsibilities.....	6
3.2	Confidentiality	6
4.0	REPORTS OF WORKPLACE <i>HARASSMENT</i> OR <i>VIOLENCE</i>.....	6
4.1	Complaints of Workplace <i>Harassment</i> or <i>Violence</i>	6
5.0	REFERENCES AND RELATED DOCUMENTS	7
5.1	References	7
5.2	Related Documents	7
6.0	QUESTIONS	8

1.0 PURPOSE, APPLICABILITY AND SCOPE

1.1 Purpose

Inter Pipeline Ltd. (“Inter Pipeline” or “IPL”) is committed to providing a workplace in which all individuals are provided the opportunity to be their best selves and perform to their highest capacity. The company is also committed to supporting and progressing a diverse and inclusive workforce. The foundation to advance both of these commitments is a psychologically safe environment based on respect and dignity.

Inter Pipeline’s vision of a respectful workplace is one in which acceptance, cooperation, courteousness, honesty, integrity, and personal accountability are emphasized in order for all employees to achieve excellence. Every person has the right to work in an environment that is safe, healthy and free from workplace *harassment¹ and violence*, which includes an environment free from *discrimination, bullying and sexual harassment*.

1.2 Applicability

This policy applies to all employees and to any individuals from outside the company in their interactions with IPL employees, such as contractors, suppliers, consultants, clients and vendors and applies both during and outside of work hours, within or outside of the workplace.

Examples of the application of this policy include all interactions that occur, on the company premises or any other location where employees may engage in company business activities, , including but not limited to:

- Work-related social events, which may or may not be hosted by IPL;
- Work-related training, conferences and meetings;
- All business travel, whether through personal, company-supplied or rental vehicles;
- Social media (for which IPL has a Social Media Policy to support);
- Any other circumstances where the individual can reasonably be seen to be representing IPL, whether on or off-business hours.

1.3 Scope

Inter Pipeline is committed to eliminating or, if that is not reasonably practicable, controlling the hazards of workplace *harassment and violence*, IPL will not tolerate any form of workplace *harassment or violence*. It will make every reasonably practicable effort to ensure that none of its workers are subjected to workplace *harassment or violence*. In this regard, the following guidelines have been developed..

2.0 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

¹ Italicized words in this Policy shall have the defined meanings set out throughout this Policy.

2.1 Definitions

Bullying – *Bullying* includes acts or verbal comments aimed at a specific person or group that causes psychological harm and it may also include physical abuse or threat of abuse. *Bullying* is often conscious, willful, and deliberate, consisting of a hostile pattern of behaviour marked by an imbalance of power, intent to harm and/or threat of aggression.

Examples include, but are not limited to, repeated and unwelcome remarks or gestures, relentless criticism, confining, isolating, excluding, belittling, intimidation, verbal abuse/name calling, harmful hazing practices, vandalizing or tampering with personal belongings, spreading malicious rumours, and other actions that are perceived as a serious threat to the employee and/or their job.

Discrimination – *Discrimination* occurs when an individual or group is treated differently based on the grounds set out in the applicable human rights legislation,.

Examples include, but are not limited to: making jokes concerning a person's ethnic origin, failing to promote an employee because the supervisor is uncomfortable with the employee's sexual orientation, and the assumption that a single parent's child care arrangements will compromise his/her opportunity to work overtime hours.

Harassment – *Harassment* includes any inappropriate, objectionable or unwelcome conduct, comment, *bullying*, display, action or gesture that intimidates, offends, degrades or humiliates a particular person or group. *Harassment*,

- (i) constitutes a threat to the health or safety of an individual;
- (ii) is based on a statutorily protected or prohibited ground under the particular human rights, health and safety, employment standards or similar legislation applicable to the workplace of the employees involved, ; or
- (iii) adversely affects the individual's psychological or physical well-being and that the person knows or ought reasonably to know would cause an individual to be humiliated or intimidated but does not include any reasonable action that is taken by IPL, or a manager or supervisor of IPL, relating to the management and direction of IPL's workers or the place of employment.

To constitute *harassment* the following must be established:

- repeated conduct, comments, displays, actions or gestures; or
- a single, serious occurrence of conduct or a single, serious comment, display, action or gesture, that has a lasting, harmful effect on the individual.

Harassment does not include reasonable actions taken in good faith while exercising managerial/supervisory rights and responsibilities. **Sexual Harassment** – *Sexual harassment* includes conduct, comment, display, action, gesture or contact of a sexual nature that is likely to cause offence or humiliation to the employee or that might, on reasonable grounds, be perceived by that employee as placing a condition of a sexual nature on employment or on any opportunity for training or promotion. Behaviour that is acceptable to both parties involved, such as flirtation, chit-chat, good-natured jesting or relationships of mutual consent would not be considered *sexual harassment*. However, if one person no longer wants the behaviour or relationship to continue, then the conduct has the risk of being deemed *sexual harassment* should the behaviours continue. *Sexual harassment* is coercive and one-sided and anyone can be subjected to it.

Examples include, but are not limited to, a sexual solicitation or advance, unwanted physical contact, unwanted gestures or actions which have sexual connotations, unwanted verbal conduct, and denigration because of gender, including sexual orientation.

Workplace Violence – *Violence*, whether at the workplace or work-related, is defined as the attempted, threatened 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*. The conduct or behaviour may be verbal, written or physical.

Examples include, but are not limited to: physical fights (including pushing, slapping and punching), verbal or written threats that express an intent or have the potential to cause harm, threatening behaviour such as shaking fists, destroying property or throwing objects and any other act that would be reasonably expected to cause harm, injury or illness, or would reasonably give rise to an apprehension of imminent harm, injury or illness.

2.2 Abbreviations and Acronyms

Abbreviation/Acronym	Description
IPL	Inter Pipeline Ltd.

3.0 RESPONSIBILITIES

3.1 Responsibilities

All employees have a responsibility to treat everyone with dignity and respect and contribute to establishing IPL's vision of a respectful workplace, as described above. Employees have a duty to report incidents of workplace *harassment* or *violence* in a timely manner and to cooperate fully in any investigation or process for resolution, including ensuring confidentiality throughout the process. It is the responsibility of IPL's executive officers and any IPL employees with supervisory responsibilities to promote a workplace that is safe, healthy and free from workplace *harassment* and *violence* and to support the principles espoused in this policy, including supporting employees who choose to file a complaint under this policy .

3.2 Confidentiality

IPL will preserve confidentiality regarding all incidents of workplace *harassment* and *violence*. IPL will not disclose the circumstances related to an incident of workplace *harassment* or *violence*, including the names of the complainant, the respondent, and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, (ii) where necessary to inform employees of a specific or general threat of workplace *violence* or potential workplace *violence*, or (iii) as required or authorized by law..

4.0 REPORTS OF WORKPLACE HARASSMENT OR VIOLENCE

4.1 Complaints of Workplace *Harassment* or *Violence*

All complaints and incidents will be taken seriously and handled expediently with consideration and respect for the complainant, respondent, witnesses and all

parties involved. IPL has developed a Workplace *Harassment* Prevention and Response Procedure and a *Violence* Prevention and Response Procedure which describes:

- Training of IPL staff on harassment, violence and this policy and related procedures;
- Measures to eliminate or control the hazard of workplace *harassment* and *violence*;
- Specific procedures to report incidents and to access immediate assistance; and;
- The process to investigate and document a complaint or incident and how the results of the investigation will be communicated.

IPL encourages individuals to bring matters of workplace *harassment* or *violence*, or of any disrespectful conduct, whether you are the subject or witness, to its attention as outlined in the Workplace *Harassment* Prevention and Response Procedure or Workplace *Violence* Prevention and Response Procedure or through the company's Whistleblower Hotline (available on interpipeline.com). Nothing in this policy is meant to discourage any party who is subject to this policy from calling the police or referring a complaint of workplace *harassment* or *violence* to the applicable regulatory body, including occupational health and safety or human rights.

Employees who have experienced workplace *harassment* or *violence* are encouraged to seek assistance from the Company provided Employee and Family Assistance Program or from an appropriate health care professional of their choice.

5.0 REFERENCES AND RELATED DOCUMENTS

5.1 References

List of related internal publications referred to in the content of this policy.

- 5.1.1** Workplace *Violence* Prevention and Response Procedure
- 5.1.2** *Harassment* Prevention and Response Procedure
- 5.1.3** Social Media Policy

5.2 Related Documents

List of relevant external publications related to the topic of this policy.

- 5.2.1** Alberta Human Rights Act, RSA 2000, c A-25.5
- 5.2.2** Occupational Health and Safety Act, SA 2017, c O-2.1
- 5.2.3** Occupational Health and Safety Regulation, Alta/Reg 62/2003
- 5.2.4** Alberta Occupational Health and Safety Code
- 5.2.5** Saskatchewan Human Rights Code, SS 1979, c S-24.1
- 5.2.6** Saskatchewan Occupational Health and Safety Regulations, 1996, RRS c O-1.1 Reg 1

5.2.7 The Saskatchewan Employment Act, SS 2013, c S-15.1

6.0 QUESTIONS

If you have any questions with respect to this policy, please contact:

Megan Joyce

Vice President, Human Resources

Phone: 403.290.2644

Email: mjoyce@interpipeline.com

7.0 APPENDIX A - LIST OF SASKATCHEWAN'S AND ALBERTA'S LEGISLATION DEALING WITH *HARASSMENT*

Jurisdiction	Protected or Prohibited Grounds	Commissions	Applicable Laws
Alberta	Race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation.	<p>Alberta Human Rights Commission Northern Regional Office</p> <p>800 Standard Life Centre 10405 Jasper Avenue NW Edmonton, AB T5J 4R7 P: (780) 427-7661 F: (780) 427-6013</p> <p>Alberta Human Rights Commission Southern Regional Office</p> <p>200 J.J. Bowlen Building 620 7 Avenue SW Calgary, AB T2P 0Y8 P: (403) 297-6571 F: (403) 297-6567</p>	<p><i>Alberta Human Rights Act</i>, RSA 2000, c A-25.5</p> <p><i>Occupational Health and Safety Act</i>, SA 2017, c O-2.1</p> <p><i>Occupational Health and Safety Regulation</i>, Alta/Reg 62/2003</p> <p><i>Occupational Health and Safety Code</i></p>
Saskatchewan	Race or perceived race, creed, religion, colour, sex, sexual orientation, family status, marital status, disability, physical size or weight, age, nationality, ancestry, place of origin, receipt of public assistance or gender identity.	<p>Saskatchewan Human Rights Commission</p> <p>8th Floor, Sturdy Stone Bldg 122-3rd Avenue North Saskatoon, SK S7K 2H6</p> <p>P: (306) 933-5952 Toll free: 1-800-667-9249 F: (306) 933-7863 TTY: (306) 373-2119</p>	<p><i>The Saskatchewan Human Rights Code</i>, SS 1979, c S-24.1</p> <p>Provisions respecting discriminatory practices and the worker's right to file a complaint with the Saskatchewan Human Rights Commission: 16 and 27.</p> <p><i>The Saskatchewan Employment Act</i>, SS 2013, c S-15.1</p> <p>Provisions dealing with harassment and the right to request assistance of an occupational health officer to resolve a complaint of harassment: 3-1(1)(l), (o), (4) and (5); 3-8 – 3-10; 3-31 – 3-36; 3-54; 3-67; and 4-5.</p> <p><i>The Occupational Health and Safety Regulations</i>, 1996, RRS c O-1.1 Reg 1</p>