

Respectful Workplace

Purpose

The purpose of this Policy is to ensure that the work environment at BCLC is respectful, professional, and free from Discrimination, Bullying and Harassment, and to clearly communicate the expectations and guidelines that BCLC has in place that support and ensure a respectful Workplace.

Scope

This Policy applies throughout the BCLC Workplace as defined in the “Definitions” section below.

Under this Policy, respectful behaviour is an expectation of all of BCLC’s employees, Contractors, Service Providers and Vendors. BCLC will take reasonable steps to coordinate with Service Providers, Vendors and other third parties whose staff have working relationships with BCLC employees to address and prevent any behaviour that BCLC finds to be damaging to a respectful Workplace or endangers the well-being or safety of individuals in the Workplace.

Inappropriate conduct prohibited by this Policy can occur directly from person to person and/or via electronic communications including email, internet, and social media. As such, this Policy applies to all uses of electronic devices, including computers and smartphones, internet-based software and platforms, whether or not owned or operated by BCLC.

This Policy is not intended to limit the legitimate and reasonable exercise of Managerial Rights or to constrain legitimate work-related behaviours which may, at times, create stress, discomfort or unpleasantness for employees, or result in Workplace conflict. These responsibilities and behaviours are reasonable and acceptable under this Policy unless they are carried out in an abusive or disrespectful manner or result in conduct prohibited by this Policy. Contact People and Culture if you have questions regarding legitimate work-related behaviours.

This Policy is not intended to constrain normal social interaction that a reasonable person would objectively view as acceptable (such as expressing differences of opinion or disagreements in a respectful manner), or conduct unrelated to the Workplace. Conduct that relates to an individual’s personal life and relationships is not within the scope of this Policy, except to the extent where it impacts others in the Workplace. Personal disputes over non-work related matters should not be engaged in at the Workplace.

If an individual is uncomfortable reporting through the process as outlined in the [Respectful Workplace Procedure](#), they have the option to proceed via the [Whistleblower Policy](#).

Policy Statement

BCLC is committed to providing a professional, safe, and inclusive Workplace environment that is free from the effects of Bullying, Harassment, and Discrimination. This commitment and responsibility to maintain a respectful Workplace is shared by everyone in the Workplace.

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This Policy prohibits the conduct defined below as Harassment, Bullying, or Discrimination in the Workplace. BCLC does not condone and will not tolerate Harassment, Bullying or Discrimination of any kind whatsoever in any interactions connected to work with BCLC, whether or not the conduct in question occurs during business hours.

EXAMPLES OF A RESPECTFUL WORKPLACE

A respectful Workplace is one where individuals:

- Are considerate of how their actions affect others;
- Think before they act, speak or type;
- Encourage fair and respectful treatment of others;
- Promote collegiality and team work;
- Embrace diversity, inclusion, and equality;
- Promote the sharing of opinions and ideas in an open-minded environment; and
- Resolve disagreements and/or disputes by maintaining the dignity of the parties involved and creating resolutions.

EXAMPLES OF RESPECTFUL VS. DISRESPECTFUL BEHAVIOR

For illustrative purposes only, some examples of respectful versus disrespectful behavior could include (but would not be limited to) the following:

- Quiet and calm communication, which focuses on the issues rather than personal characteristics of the individuals involved vs. loud, profane, name-calling and abusive language that may also focus on personal characteristics;
- Expressing and resolving disagreement in a calm and professional manner vs. insulting or belittling others through personal attacks or sarcasm or through non-verbal behavior that may include repetitive eye-rolling, loud sighing, disrespectful facial expressions, shunning, stone-walling discussions, walking out of discussions prematurely or making physical or psychological threats;
- Addressing issues and concerns regarding work performance or misconduct in a confidential, discreet manner through a direct leader vs. engaging in gossip, rumors, speculation or criticism of an individual to others or discussing issues in front of individuals who do not need to be a part of the discussion; and
- Sharing information required to deliver services effectively vs. repeatedly ignoring questions or requests for information or deliberately failing to provide necessary/helpful information.

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Context

BCLC values, promotes, and is committed to providing a safe and healthy work environment that is characterized by professionalism, inclusiveness and respect. Bullying and Harassment is an occupational health and safety issue that poses a potential risk to the physical or mental health and safety of employees. It can lead to lower productivity, physical or mental illness and a negative work environment.

All individuals are accountable for their own behaviour. BCLC expects its employees, Contractors, Service Providers, Vendors, and third parties with whom it has a working relationship to conduct themselves in a respectful and appropriate manner at all times.

Related Materials:

- Respectful Workplace Procedures
- Incident Reporting Form
- [BCLC Standards of Ethical Business Conduct \(SOEBC\)](#)
- [Workplace Violence Prevention Policy](#)
- [Progressive Discipline Policy](#)
- Whistleblower Policy

Policy Details

FAIRNESS

Parties involved in a complaint under this Policy have a right to fair treatment in the consideration and investigation of complaints and concerns under this Policy and the Procedure. Fair treatment includes the right to:

- Bring forward their concerns pursuant to processes within the Policy and the Procedure within a timely manner;
- Protection to any Party or Witness (as defined in the Respectful Workplace Procedure) from retaliation for participation in processes under this Policy;
- Be informed in a timely manner of complaints made against them;
- Receive regular updates on the progress of claims;
- An impartial and objective consideration and evaluation of the circumstances, through informal or formal intervention;

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- Participation in informal or formal intervention as appropriate, including an opportunity to provide their perspective to BCLC during any investigation of a complaint;
- Confidentiality around the complaint to the extent possible in the circumstances; and
- Being informed of the outcome of any formal investigation or complaint.

CONFIDENTIALITY

All individuals involved in a complaint or in the informal/formal resolution of a complaint are expected to keep all related matters confidential. This includes but is not limited to, the parties involved, witnesses, Leaders and/or People and Culture employees who are aware of the complaint or complaint resolution process.

An established breach of confidentiality regarding a complaint or complaint resolution process will be considered an independent violation of the Policy, which may be subject to disciplinary action.

Any allegation or complaint under this Policy will be considered Personal Information supplied in confidence. The names of those involved in the complaint shall not be disclosed to any person except where necessary for the purpose of fairly investigating and determining the outcome of the complaint, or as permitted or required by law.

The substance of investigative reports and related meetings conducted by those in authority to make decisions, will be protected from disclosure to third parties to the extent permitted by law. This is applicable regardless of whether the complaint is substantiated or not.

EDUCATION AND TRAINING

All employees at BCLC must participate in annual respectful Workplace training. Training sessions will be provided to departments and service units, as required, or upon request, and full compliance is expected. An external training provider may also be brought in to deliver focused training workshops to areas/departments, when deemed necessary.

RETALIATION PROHIBITION

Any retaliation against an individual for opposing or complaining about behaviour prohibited by this Policy, initiating a complaint under this Policy in good faith, participating in an investigation under this Policy, or associating with another individual who initiated a complaint or participated in an investigation is prohibited. An act of retaliation may be subject to corrective measures, up to and including termination of employment (or Contract), regardless of the merits or outcome of the initial concern or complaint.

BAD-FAITH/MALICIOUS COMPLAINTS

BCLC recognizes that false accusations of Discrimination, Harassment or Bullying may have serious impacts. Anyone who is found to have made a false or reckless allegation under this Policy, or who makes such allegations

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for improper purposes, may be found to have violated this Policy and may be subject to corrective measures, up to and including termination of employment (or Contract). Discipline administered in response to a bad-faith or malicious complaint does not constitute retaliation.

A complaint that is unfounded because of bona fide mistakes or misunderstandings is not in bad-faith/malicious conduct. No corrective action will be taken against anyone who files a complaint in good faith.

Roles and Responsibilities

All individuals in the Workplace are responsible for:

- Complying with this Policy, the Procedure and other applicable policies and procedures that are related to preventing and addressing Discrimination, Bullying and Harassment in the Workplace;
- Conducting themselves in a respectful and appropriate manner, refraining from engaging in Bullying, Harassment or Discrimination of any kind, and proactively maintaining a Workplace environment free from Bullying, Harassment and Discrimination;
- Promptly reporting incidents of Discrimination, Harassment, Bullying or breaches / suspected breaches of the Policy which are experienced or observed; and
- Fully participating and cooperating with BCLC in the investigation process of potential violations of this Policy.

In addition to and without limiting the above, **employees** are responsible for:

- Participating in annual training related to this Policy, as directed by BCLC.

In addition to and without limiting the above, **Leaders** are responsible for:

- Participating in management-specific training related to this Policy;
- Providing training related to this Policy, as directed by BCLC, and ensuring full staff participation;
- Creating a respectful work environment by taking reasonable steps to ensure the Workplace is free from Discrimination, Harassment or Bullying;
- Promptly responding and/or intervening as appropriate when any unacceptable behaviour is observed or suspected in good faith, whether or not it is reported;
- Promptly advising People and Culture of reported breaches of this policy;
- Facilitating, supporting and participating in the investigation process of reported incidents, as directed by BCLC;
- Taking appropriate follow-up measures or corrective actions following an investigation, as directed by BCLC; and

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- Working with People and Culture, as directed by BCLC, to review this Policy and the Procedure on an annual basis.

People and Culture is responsible for:

- Providing education and training to support this Policy and the Procedure;
- Establishing and implementing procedures for reporting, investigating and resolving complaints;
- Ensuring reports under this Policy are promptly addressed;
- Keeping records of complaints, investigations, corrective actions and follow-up measures;
- Monitoring staff perception that BCLC operates a respectful Workplace, and identifying and addressing questions regarding BCLC’s commitment to a respectful Workplace; and
- Reviewing this Policy and the Procedure on an annual basis.

Compliance

Failure to comply with this Policy may result in corrective action up to and including termination of employment or services, whichever is applicable. Disciplinary measures for employees will be administered in accordance with BCLC’s [Progressive Discipline Policy](#). Corrective measures for breach of this Policy may also be taken against persons who are not employed or engaged by BCLC to the extent possible, including revoking access to BCLC’s premises if appropriate.

OTHER RIGHTS

Nothing in this Policy compels anyone to make a complaint or replaces any other legal rights a person may have or that BCLC may have to address the subject matter of the complaint.

Definitions

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| Bullying | A form of harassment marked by the intentional attempt or pattern of conduct to intimidate, demean, belittle, humiliate, torment, control, mentally or physically harm or isolate another person(s). |
| Discrimination | Means treating people differently, negatively or adversely because of their race, age, religion, sex, or some other prohibited ground of discrimination found in the <i>BC Human Rights Code</i> . |
| Harassment | Includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated. Harassment includes |

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discriminatory harassment (harassment that is related to a prohibited ground of discrimination under the *BC Human Rights Code*) and sexual harassment (harassment that is based on sex). It can be either repeated conduct or a single serious incident that has a lasting, harmful effect on the recipient.

Examples of conduct that may constitute harassment include:

- Cartoons or other visual displays of objects, pictures or posters that depict persons in a derogatory way;
- Verbal or written insults, epithets, slurs and jokes about a person, whether or not based on a prohibited ground of discrimination (e.g. commentary about their physical appearance, working style, level of intelligence, etc.);
- Vandalizing personal belongings;
- Verbal or written threats, or unwanted physical contact or violence;
- Ignoring or isolating a person or treating a person adversely for no legitimate work purpose;
- Spreading malicious rumours or gossip;
- Unwanted sexual advances;
- Requests for sexual favours;
- Sexual innuendos, or suggestive or offensive comments or gestures emphasizing sexuality or sexual identity; and
- Any conduct that reasonably leads to the perception that a condition of a sexual nature is being placed on a person's employment or any opportunities for persons in the Workplace.

Harassment may exist regardless of the intent of the conductor.

Bullying and Harassment does not include (a) any exercise of Managerial Rights or reasonable action taken by an employer or managerial employee relating to the management and direction of workers or the place of employment that is undertaken in a good faith manner, (b) disagreements or interpersonal conflicts between persons at the Workplace, and (c) expressing differences of opinion in a respectful manner, unless those actions result in behaviour that is prohibited by this policy. Any questions related to these exclusions can be directed to People and Culture.

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| People and Culture | Means the People and Culture Advisor allocated to support an employees division, or the Manager, People Operations. |
| Manager | Means an employee whose position has been designated by BCLC as a managerial position. The employee's principal employment duties consist of supervising or directing, or both supervising and directing. Managers have the term Manager in their position title. |
| Managerial Rights | Refers to a Manager's or Supervisor's responsibilities, with support from People and Culture, which may include, but are not limited to: coaching, mentoring, providing work direction, addressing interpersonal conflicts, supervising, managing and evaluating performance including providing feedback for improvement, making changes to working conditions or job duties, transfers and reorganizations, investigating breaches of BCLC's policies, determining and implementing disciplinary action including warnings and termination of employment, or other direction or management of individuals. |
| Policy | Refers to the Respectful Workplace Policy. |
| Procedure | Refers to the Respectful Workplace Procedure. |
| Prohibited Grounds | Refers to the prohibited grounds articulated in the <i>BC Human Rights Code</i> i.e. race, color, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex (includes pregnancy), sexual orientation, age, gender identity or expression, and conviction of a criminal or summary conviction offence that is unrelated to the employment or to the intended employment of that person. |
| Supervisor | Means an employee whose position has been designated by BCLC as a managerial position. The employee's principal employment duties consist of supervising or directing, or both supervising and directing. Supervisors do not have Manager in their position title, however, report directly to a Manager. |
| Workplace | Means any work-related environment, including but not limited to the BCLC premises and property (including corporate vehicles), corporate social functions, work-related trips, the workplace premises of BCLC's Service Providers, Vendors and third parties where BCLC employees carry out their work duties, or at non-BCLC venues/events where employees or Contractors are representing BCLC. |

Policy

APPROVED

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Policy Ownership

Contact Position People and Culture Advisor
Policy Owner BCLC Board of Directors
Approving Body BCLC Board of Directors

Revision History

| Version | Effective | Approved by | Amendment |
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| 1.0 | Sept 11, 2020 | BCLC Board of Directors | This policy supersedes the Harassment Policy. |