

Harassment, Bullying and Discrimination Policy

February 26, 2025

Policy

Stantec prohibits harassment and discrimination of an employee on the basis of characteristics such as race, sex, gender, color, creed, religious beliefs, citizenship status, national origin, age, marital status, sexual orientation, gender identity, or disability. Stantec further prohibits bullying as described in this Policy.

Stantec is committed to creating and maintaining a working environment that is free of such objectionable and disrespectful conduct. Harassment, bullying and discrimination of or by employees, clients, or visitors of Stantec shall not be tolerated. Any person who engages in harassment, bullying or discrimination while acting as an employee of Stantec, while at a Stantec workplace, or through the use of social media is in violation of this policy. The term "workplace" includes both Stantec premises and off-site locations.

Psychological Harassment

Psychological harassment is vexatious and/or contemptuous behavior expressed through hostile or undesirable conduct, remarks, repeated acts or gestures which undermine the employee's dignity or psychological integrity and cause a harmful work environment for employees.

A single instance of such behavior can constitute psychological harassment if it is sufficiently serious and disturbs or provokes continued harmful effects for an employee. Psychological harassment can come from an individual or a group and may be directed towards one or several people. A person may be harassed even if he or she was not the intended 'target'. For example, a person may be impacted by racist jokes, even when they are about a different ethnic group.

Examples of psychological harassment may include:

- Unacceptable or offensive behavior resulting in the humiliation, belittling, exclusion or embarrassment of an employee
- Demeaning, degrading, offensive or humiliating comments or behavior on the basis of characteristics such as race, sex, gender, color, creed, religious beliefs, citizenship status, national origin, age, marital status, sexual orientation, gender identity, or disability
- Excessive, inappropriate or unjustified use of power or of authority, or the desire to harm, expressed through intimidation, threats, blackmail or coercion.

Sexual Harassment

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature. Sexual harassment in the workplace may also involve the following:

- Submission to such conduct is either explicitly or implicitly made a term or condition of employment
- Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive employment environment

Examples of prohibited conduct

Sexual harassment may include but is not limited to the following:

- Suggestive or obscene letters, notes, invitations, derogatory comments, slurs, jokes, epithets, assault, touching, impeding or blocking of movement, leering, gestures, or display of sexually suggestive objects, such as pictures or cartoons
- Continuing to express sexual interest after being informed that the interest is unwelcome
- Implying or withholding support for an appointment, promotion, or change of assignment or suggesting that a poor performance report will be prepared if sexual advances are resisted

Coercive sexual behavior used to control, influence, or affect the career, salary, and/or work environment of another employee includes the following:

- Offering or granting favors or employment benefits, such as promotions, favorable performance evaluations, favorable assignments, favorable duties or shifts, recommendations, or reclassification, in exchange for sexual favors
- Retaliating against employees who complain (or attempt to complain) about the behaviors described above

Bullying

Bullying is offensive, intimidating, malicious, or insulting behaviour that makes another person feel vulnerable, humiliated, undermined, or threatened.

This may or may not come from someone in a position of authority and could be from a person with personal strength or holding some other form of fear, power or coercion over the other party. Bullying may often be a repeated form of behaviour and is more than a mere clash of personalities or disagreement.

Legitimate evaluative criticism and counseling of an employee's performance or behavior, or reasonable instructions given to an employee in the course of his or her employment, will not amount to harassment or bullying on their own.

Examples of bullying conduct:

- **Verbal** - Slandering, ridiculing, or maligning a person or their family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks or nicknames. Screaming, shouting, yelling, or swearing at someone in public or private; trivializing another's work or failing to give someone credit for their work.
- **Physical** - Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- **Nonverbal**- Obscene, threatening, or intimidating gestures, including staring or glaring.
- **Social**- Socially or physically excluding or disregarding a person in work-related activities; giving the "silent treatment"; persistently singling out one person.

Practice

Harassment, bullying and discrimination complaint procedures

Any employee who believes that they are being harassed, discriminated against or bullied by a supervisor, colleague, or other individual with whom they come in contact as a result of their employment with Stantec must immediately inform their direct supervisor or their regional Human Resources manager of the incident(s), providing, where possible, the following information:

- Description of the offensive behavior
- Identity of the alleged offender
- Date(s) the incident(s) took place
- Details of any discussions with the alleged offender about the offensive behavior
- Surrounding circumstances
- Witnesses to the offensive behavior or other people who may have first-hand knowledge of the incident(s) or surrounding circumstances

Supervisors, upon receiving a complaint, are to immediately forward this information to the regional Human Resources manager.

Investigation of a complaint normally includes interviews of the parties involved and any named or apparent witnesses. In determining whether the alleged conduct constitutes harassment, investigators are to consider the record as a whole, as well as the total circumstances. Complaints are to be investigated in a timely manner.

The initiation of a complaint in good faith will not reflect in any way on the recruitment, hiring, transfer, promotion, or other terms and conditions of employment of the complainant. Confidentiality will be safeguarded insofar as possible while recognizing other legal and business obligations of Stantec.

An employee who sees, believes, or knows that a colleague, client, or other individual with whom they have contact through their employment with Stantec is the victim or perpetrator of conduct that falls within this policy is to report it to their supervisor, the regional Human Resources manager, senior vice president, or chief operating officers.

An employee's response to incidents of harassment, bullying or discrimination is not limited to the above procedures. In some circumstances, it may be appropriate to contact outside authorities, such as the police. An employee has the right to file a complaint with local government agencies (.e.g., the Equal Employment Opportunity Commission [EEOC] in the United States, the Human Rights Tribunal of Ontario or the Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST) in Quebec).

Additional information on this topic is available on a number of jurisdictional and federal web sites.