

SUDBURY  
**INTEGRATED NICKEL**  
 OPERATIONS  
 A GLENCORE COMPANY

## Workplace Harassment and Violence Policy

Sudbury Integrated Nickel Operations is committed to providing a work environment in which all workers are treated with respect and dignity. We are committed to the prevention of workplace harassment and violence and will take whatever steps are reasonable to protect our workers from workplace harassment and violence from all sources. Workplace violence and harassment will not be tolerated from any person in the workplace (including customers, clients, other employers, supervisors, workers and members of the public, as applicable).

**Workplace Harassment** means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or workplace sexual harassment.

**Workplace Sexual Harassment** means:

- a) engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome;

**Workplace violence** is defined as the exercise or attempted exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker, or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

Workers are encouraged to report any incidents of workplace harassment or raise any concerns regarding violent incidents or threats to the appropriate person, a Supervisor, 2<sup>nd</sup> line Supervisor, a Union Steward, Human Resources Manager, Human Resource staff or a person on staff whose job it is to help resolve the situation or through Glencore Raising Concerns program.

Management will investigate and deal with all complaints or incidents of workplace harassment and violence in a fair, respectful and timely manner. Information provided about an incident or about a complaint will not be disclosed except as necessary to protect workers, to investigate the complaint or incident, to take corrective action or as otherwise required by law.

Managers, supervisors and workers are expected to adhere to this policy and the supporting programs, and will be held responsible by the employer for not following it. Workers are not to be penalized or disciplined for reporting an incident or for participating in an investigation involving workplace harassment or violence.

If a worker needs further assistance, he or she may contact a JHSC representative, Occupational Health Nurse, Senior Union Representative (if applicable), Human Resources or the Employee Assistance Program. Workers can also reference the supporting applicable programs, Workplace Harassment Program and Prevention of Workplace Violence and Harassment Program which outlines how workers can summon immediate assistance and can report incidents or raise concerns.

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