



TELUS Respectful Workplace Policy

January 2021

Respectful Workplace Policy

[including Workplace Violence Prevention]



TELUS is committed to creating an inclusive workplace and leveraging the diversity of thought that exists within our teams with the goal of fostering a universal sense of belonging at work.

TELUS has a legal obligation to keep our team members safe, both physically and psychologically, and we embrace these obligations. Beyond our legal obligations, we hold ourselves to a high standard of behaviour, and commit to preventing unhealthy conflict and Unacceptable Behaviour. When Unacceptable Behaviour or unhealthy conflict does occur, we aim to recognize and resolve these matters in a way that minimizes negative impact to our team members.

At TELUS, the unwavering commitment to a positive, professional and respectful work environment is a foundational element of our culture of caring and inclusion. At TELUS we expect our team members to:

- Demonstrate healthy communication and value the strength of our team's diverse backgrounds and perspectives
We listen, seek different opinions, and are respectful of others even when we don't agree with them
- Take responsibility for supporting our culture of caring and inclusion, and the well-being of our teammates
We are mindful of what we say and do, and pay attention to what's happening around us
- Take action when we observe unhealthy conflict or Unacceptable Behaviour
We intervene or seek support so that concerns are addressed early, and negative impacts are minimized

What should team members do when Unacceptable Behaviour occurs?

When team members experience or become aware of Unacceptable Behaviour, including as a bystander, they have a responsibility to report it to their leader and/or the Respectful Workplace Office (RWO). TELUS will address Unacceptable Behaviour confidentially and in a timely manner, in accordance with applicable legislation and TELUS policies, to restore a physically and psychologically safe workplace.

Team members are encouraged to address unhealthy conflicts that would not amount to Unacceptable Behaviour quickly and directly with the person involved, if they are comfortable doing so. Resources on conflict resolution can be provided by the RWO.

What resources are available to team members?

If you'd like to...

- Seek guidance to resolve an unhealthy conflict or concern

Contact

- Your Leader
- Respectful Workplace Office (RWO)
- Your People & Culture Business Partner

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- Make a complaint about Unacceptable Behaviour (verbally or in writing)
 - Report concerns related to customer behaviour (for frontline team members)
 - Access additional support related to the personal impact of a conflict or incident
 - Respectful Workplace Office (RWO)
 - TELUS' Ethics Office
 - Your Leader
 - Our Abusive Customer Process (for Customer Experience or Customer Solutions Delivery)
 - Our free and confidential Employee & Family Assistance Program
- Support is available online, and by phone at 1-800-387-4765 (24 hours a day, 7 days a week)

Additional resources are available from the RWO for support related to:

- Domestic violence
- Mental health challenges
- Psychological safety
- Conflict resolution

Scope & Responsibilities

Who does the Policy apply to?

This Policy applies to all TELUS team members and contract employees of TELUS. This Policy complements TELUS' Code of Ethics and Conduct.

Our International teams are governed by the laws of the countries in which they operate, and will adapt this Policy as appropriate in accordance with local Human Rights and Workplace Safety laws.

While customers, suppliers, and other stakeholders are not directly subject to our internal policies, TELUS expects respectful and non-discriminatory behaviour from them, as we do from our own team.

When and where does the Policy apply?

This Policy applies to Unacceptable Behaviour that has the potential to negatively impact the workplace, adversely affect employee relationships, or lead to adverse job-related consequences for the impacted individual(s). This may include behaviour that occurs either during or outside of working hours, and in any location where work-related interactions take place, whether physical or virtual. This includes circumstances in which domestic violence would likely lead to physical or psychological harm in the workplace.

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Examples include:

- Work-related travel, conferences or training sessions
- Social functions that are associated with work or coworkers
- Social media activity accessible by team members

What are the expectations of team members at TELUS?

At TELUS, all team members and contract employees are expected to act professionally and respectfully and intervene or seek support to minimize and resolve Unacceptable Behaviour impacting the workplace.

Because of their influence and authority, leaders are responsible for modelling the highest standards of behaviour, taking action to prevent and resolve Unacceptable Behaviours, and setting the tone for healthy workplace interactions. When a complaint is shared with a leader, the leader is responsible to notify the RWO for guidance on addressing the issue.

Team members are encouraged to contact their leader or the RWO if they have any questions about their rights or responsibilities under this Policy. For more details, see Appendix B: Responsibilities.

What are the consequences of a Policy violation?

Respectful behaviour is critical to the physical and psychological safety and well-being of our team members. Behaviour that violates this Policy – including a complaint made in bad faith, a breach of confidentiality, or retaliation for a complaint – is not acceptable and may result in discipline up to and including termination.

What are Unacceptable Behaviours that would violate the Policy?

Unacceptable Behaviour can take many forms and can include a single incident or multiple incidents over a period of time. They are typically any words, gestures or behaviours that could reasonably cause offence, humiliation, harm, or physical or psychological injury or illness. For detailed definitions, see Appendix A: Definitions.

While the following is not an exhaustive list, some examples of Unacceptable Behaviour include:

- Discrediting a colleague by spreading gossip or rumours
- Ridiculing or criticizing a team member in front of others
- Sarcasm and eye rolling with the effect of isolating or embarrassing a team member
- Yelling or using profanity directed at a team member
- Reinforcing stereotypes or racial, ethnic or gender distinctions (e.g. “those people [referring to a Particular race, nationality, or generation] don’t do a good job”)
- Displaying or sharing offensive or sexually suggestive jokes or images
- Questions or remarks about sex, or one’s dating or sex life
- Threatening or violent behaviour such as verbal or physical intimidation or destroying property or throwing objects

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- Making a hiring decision based on age or gender, when not based on a true job requirement
- Spreading rumours or participating in gossip about a team member who filed a complaint, or anyone involved in a complaint

What are Good Faith behaviours?

Good Faith behaviours are reasonable actions carried out for a legitimate business purpose. Even if they are unpleasant or uncomfortable for a team member, they do not violate the Policy. The following Good Faith behaviours are examples of appropriate and acceptable work-related conduct that do not fall within the definition of Unacceptable Behaviour:

- Respectfully debating an idea or decision, such as:
 - Disagreements or differences of opinion, when handled professionally and without resulting in Unacceptable Behaviour
- Management and direction of team members when handled respectfully, such as:
 - Assigning or re-assigning tasks, even when they are difficult, new, or unexpected
 - Providing feedback or conducting a performance review, including critical feedback shared constructively
 - Conducting an investigative meeting to explore facts and explanations for possible misconduct
 - Discussing absenteeism or concerns with attendance at work
 - Making a change in a team member's work environment or work location
- Any action taken by TELUS as a result of a violation of this Policy

Process

What should I do in the event of an emergency or physical violence?

In an emergency situation, including where there is an imminent threat of physical violence, team members should attempt to remove themselves from the situation if possible, and immediately notify appropriate authorities. For emergency, call 911 and Corporate Security at 1.888.845.6100 (available 24 hours per day)

Non-emergency situations or incidents of physical violence in the workplace where there is no longer an imminent threat should be brought to the attention of a supervisor or leader as soon as possible, who may consult with Corporate Security for guidance at 1.877.333.8888 (available 24 hours per day).

How will concerns or complaints of Unacceptable behaviours be handled?

A request for support or guidance regarding concerning or potentially Unacceptable Behaviour may be brought to a leader or the RWO at any time for consultation. These consultations will be handled on a case-by-case basis, with the objective of resolving the matter and preventing any further negative team member impacts.

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Team members who believe they have experienced or witnessed Unacceptable Behaviour and who wish to seek resolution may also choose to file a formal complaint. Complaint forms may be filed with the RWO, either verbally or in writing. The objective in addressing any complaint is to restore a positive, professional, and psychologically safe work environment for all team members.

Complaints will first be reviewed to determine whether all necessary information has been provided, whether the allegations may represent Unacceptable Behaviour, and to consider possible appropriate responses. Responses may include education, mediation, facilitated discussion, or other measures. Though not required in all cases, an investigation may be initiated, by the RWO or another team as appropriate, to determine whether there has been a Policy violation and if discipline is warranted.

For team members working in TELUS' federally-regulated operations, additional steps may be taken in accordance with the *Canada Labour Code*, including an investigation as outlined in the applicable regulations. These investigations will focus on eliminating or minimizing the risk of a similar occurrence in the future, but will not result in recommendations for individual remedies or corrective action applicable to the complainant or respondent such as discipline, role changes or re-assignments, or time off.

When complaints are received without information that allows the identification of the individual who experienced the alleged Unacceptable Behaviour, it may not be possible to resolve the complaint. In the absence of the necessary identifying information, the leader or the RWO will determine the appropriate response.

A team member may have a support person present, including a union representative for those team members covered by a collective agreement, during the resolution process. The person must not be in a real or perceived conflict of interest situation, such as a witness to an incident, or someone related to the complaint. These individuals must agree to maintain the confidentiality of all information shared during the resolution of the complaint and may act as an observer to the investigation.

The assistance of Corporate Security may be requested, for an investigation of alleged threats, physical violence or related issues as appropriate, and their assistance will be provided in a manner consistent with this Policy.

The RWO can answer any questions about the process, whether general or specific to individual circumstances.

Conflict of Interest

The RWO will address any complaint of Unacceptable Behaviour in an impartial and unbiased manner. In the event that a member of the RWO has a pre-existing relationship to a team member alleged to have engaged in Unacceptable Behaviour, the complaint will be addressed by an alternate RWO team member or investigator as appropriate, at the discretion of the RWO.

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Alternate Resolution Paths

Team members may have the ability to pursue multiple resolution paths for alleged Unacceptable Behaviour, including filing a grievance per the terms of a collective agreement (where applicable), or seeking redress under the *Canadian Human Rights Act* (or applicable provincial *Human Rights legislation*) or the *Criminal Code*.

Workplace Assessment

At TELUS, our Health & Safety Committees are responsible for performing workplace assessments to identify situations that could put team members at risk of experiencing Unacceptable Behaviour. The assessments include a review of potential risks of Unacceptable Behaviour and will result in the implementation of prevention and control measures aimed at keeping team members physically and psychologically safe.

Factors that may increase a team member's risk of experiencing Unacceptable Behaviour include:

- Contact with the public
- Contact with clients (in person and on the phone)
- Exposure to domestic violence
- Working alone
- Inadequate controls and protection against Unacceptable Behaviour
- Lack of awareness about existing organizational controls and support

Workplace assessments will be reviewed at least every three years. When a significant change occurs in relation to a work process, the scope of business, or the effectiveness of preventative measures, any potential new risks will be assessed and prevention and control measures will be implemented.

When a complaint of harassment or violence in the workplace is reported by a team member working in TELUS' federally-regulated operations, there are several additional circumstances when the existing workplace assessments will be reviewed. TELUS, with the support of the Policy Health & Safety Committees, will conduct these reviews in the appropriate circumstances, as outlined in the applicable regulations.

Training

All TELUS team members, as well as all contract employees of TELUS, will complete training on fostering a Respectful Workplace within three months of their hire date, and at least every three years afterward. The training will include an overview of:

- Elements of the Policy
- Unacceptable Behaviour, including the prohibited grounds of discrimination set out in the *Canadian Human Rights Act* or applicable legislation
- How to recognize, minimize, prevent and respond to Unacceptable Behaviour

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Additional training may be provided by the RWO as determined appropriate, or as part of the resolution of a complaint.

Confidentiality and Privacy

Every effort will be made to keep personal information confidential in the complaint and resolution process. Personal information obtained about a concern or complaint under this Policy, including names and other identifying information about individuals involved, will not be disclosed unless necessary for the following purposes:

- To conduct a proper and fair investigation of a complaint, including disclosing to the individual alleged to have engaged in Unacceptable Behaviour the information necessary to give them a fair opportunity to respond to a complaint
- To obtain legal and other professional advice as appropriate or necessary
- To address the outcome of a complaint, including in relation to corrective or disciplinary action
- To comply with the law or direction from relevant authorities, in relation to litigation, or to protect the safety of an individual

Any disclosure of personal information will be restricted to the minimum amount necessary in the circumstances.

Unless a member of the Respectful Workplace Office (RWO) provides permission or direction, a team member must not:

- Disclose the name of any party involved in a complaint or the circumstances related to the complaint
- Discuss the complaint with coworkers or any other person

Any records related to this Policy including any complaints, resolutions, and reports, will be maintained by the RWO or supporting team as appropriate. Records related to any corrective action may also be maintained in personnel files and with appropriate managers.

Canada Labour Code Compliance

In accordance with section 127.1 of the Canada Labour Code and applicable Regulations, if a team member believes there has been a contravention of the Code as it relates to an occurrence of Harassment and Violence, the team member may make either a verbal or written complaint to the Respectful Workplace Officer.

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Appendix A: Definitions

Prohibited grounds

Prohibited grounds are certain protected personal characteristics that are defined by the applicable Human Rights legislation for the jurisdictions in which TELUS operates.

Prohibited grounds typically include: race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, and disability.

The prohibited grounds in legislation governing provincially regulated or international TELUS entities may differ. For further information, contact the RWO.

Unacceptable Behaviour

Under this Policy, “Unacceptable Behaviour” refers to the following types of conduct. Where there may be a difference, definitions in applicable legislation will prevail. It is recognized and intended that these definitions may overlap.

Workplace Violence

Any attempted or actual conduct of a person towards a team member in their workplace that causes or can reasonably be expected to cause physical or psychological harm, injury or illness to that team member. It includes any threatening statement or behaviour that gives a team member reasonable cause to believe that they are at risk of physical injury in the workplace, including physical and sexual assault, sexual violence, intimate partner violence, and domestic violence.

Discrimination

Discrimination means a distinction, whether intentional or not, based on a Prohibited Ground, which has the effect of imposing burdens, obligations, or disadvantages on a team member, and that is not imposed on others, or which withholds or limits access to opportunities, benefits, and advantages available to other team members.

Discrimination may include behaviours, comments, or broader systemic issues related to one or more Prohibited Grounds that have or could have a negative effect on individuals in the work environment, including adverse job-related consequences.

Discrimination may be lawful in circumstances of a bona fide occupational requirement.

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Harassment

Any conduct, comment, display, action or gesture by a person, including conduct of a sexual nature or bullying, related to employment by TELUS, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to a team member including conduct that:

- May or may not be based on or related to a Prohibited Ground of Discrimination as set out in the applicable Human Rights legislation
- Is objectionable or unwelcome, including in circumstances where the person knew or reasonably ought to have known the conduct would be unwelcome
- Violates a person's right to respect, dignity and protection of physical or psychological integrity
- Is prescribed or defined specifically in applicable legislation

Harassment may occur at or away from the workplace, and consists of repeated incidents or a single significant occurrence. Behaviour need not be intentional in order to be considered harassment.

Harassment does not include any Good Faith action taken by TELUS, relating to the management and direction of team members or the workplace.

Sexual Harassment

Sexual Harassment is a form of Discrimination and Harassment. It means any conduct, comment, gesture or contact, including a course of comments or conduct, that is of a sexual nature because it is based on sex, sexual orientation, gender identity or gender expression, that is directed towards a team member, where the comment or conduct is known or ought reasonably to be known to be unwelcome.

It includes conduct that is likely to cause offence or humiliation to a team member or that might, on reasonable grounds, be perceived by that team member as placing a condition of a sexual nature on employment or on any opportunity related to employment.

Inappropriate Conduct

At TELUS we aspire to a workplace where we do more than meet the standards required by law. Inappropriate Conduct is defined broadly to mean an incident or series of incidents that do not violate provincial or federal workplace Health and Safety or Human Rights legislation, and do not meet the definition of Harassment or Violence, but which create challenges in the work environment based on interactions, comments or conduct that:

- Are unwelcome or ought reasonably to be known to be unwelcome
- While not rising to the level of Harassment, are unconstructive or contrary to TELUS values and our aspiration to create a workplace that values respect, civility, diversity, and inclusiveness
- Are not included within Good Faith actions taken by TELUS relating to the management and direction of team members or the workplace

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Retaliation

Retaliation means adverse action taken against an individual for: having invoked this Policy in good faith; having participated or cooperated in any resolution or investigation under this Policy; or for having been associated with a person who has invoked this Policy or participated in the resolution or complaint process.

Complaints made in Bad Faith

A complaint made in bad faith is a one that alleges Unacceptable Behaviour, and which is found to be trivial, frivolous, or vexatious. These complaints diminish the trust and value of the resolution process.

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Appendix B: Responsibilities

TELUS

- Making team members, and contractors who are subject to it, aware of this Policy, implementing this Policy, and providing training
- Taking action to correct Unacceptable Behaviour and prevent recurrence
- Ensuring the health and safety of team members through supervision and management in accordance with health and safety obligations and this Policy
- Protecting team members from Retaliation and providing support to team members when Unacceptable Behaviour has occurred
- Taking reasonable precautions in the circumstances for the protection of a team member if TELUS becomes aware that a team member's personal safety is in jeopardy, including in circumstances where an intimate or domestic partner relationship would likely expose a team member to physical injury in the workplace
- Compliance with applicable provincial and federal Human Rights or Health & Safety legislation

Respectful Workplace Office (RWO)

- Supporting the TELUS team in building a strong culture of inclusiveness and respect in the workplace by facilitating proactive and creative outcomes to workplace conflicts through education, consultation, mediation and investigation
- Maintaining records as required by this Policy
- Reviewing, updating and implementing this Policy as required, and in accordance with legislative requirements
- Investigating complaints brought to the attention of TELUS by team members
- Conducting investigations thoroughly and impartially, or overseeing investigations where applicable
- Providing guidance or recommendations for resolving unhealthy conflicts or Unacceptable Behaviour
- For team members within the scope of the *Canada Labour Code*, the RWO is the Designated Recipient for reports of Workplace Violence & Harassment

All team members

- Creating and maintaining a respectful workplace through their own conduct; treating others with dignity and respect
- Understanding this Policy and supporting or participating in training
- Complying with this Policy and refraining from engaging in Unacceptable Behaviour
- Speaking up in a timely way to report observations or experiences when Unacceptable Behaviour occurs, regardless of who is involved, or their position in the organization
- Intervening promptly, and taking action where reasonable and safe to do so, to address Unacceptable Behaviour, even when the team member is not directly involved
- Consulting with the RWO as needed to resolve workplace issues as early as possible

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- Supporting, including cooperating fully with, the resolution and investigation of complaints, including by being truthful and forthright
- Maintaining confidentiality
- Cooperating in reaching and implementing resolutions under this Policy including disciplinary measures, corrective action, and restoration of a safe, positive and professional work environment, where necessary

Health & Safety Committees

In accordance with applicable Health & Safety legislation, Health & Safety Committees are responsible for:

Workplace Health & Safety Committees

- Working with the employer in reviewing and updating workplace assessment(s)
- Working with the employer in determining which recommendations of an investigator's report regarding team members working in our federally-regulated operations must be implemented, in accordance with the *Canada Labour Code* and applicable regulations

Policy Committees

- Working with TELUS to develop, review and update the policy addressing workplace harassment and violence
- Working with TELUS to identify the risk factors that contribute to harassment and violence in the workplace
- Working with TELUS in developing, monitoring and updating the workplace assessment
- Working with TELUS to implement preventative measures identified through the workplace assessment
- Working with TELUS to develop, implement, review, and update emergency procedures
- Working with TELUS to develop and update training on workplace harassment and violence
- Working with TELUS to identify a list of investigators per section 27.1(a) of the Workplace Harassment & Violence Regulations
- Encouraging all team members to participate in Respectful Workplace training

The Union(s) that represent TELUS team members are committed to working with TELUS to promote a healthy and respectful workplace.