

Purpose

407 ETR is committed to provide a working environment that is safe, healthy, rewarding, and free of violence and/or any threat thereof. The purpose of this document is to communicate the Policy for Prevention of Workplace Violence of 407 International Inc. and its affiliates (collectively, “**407 ETR**”). This Policy describes the processes that 407 ETR has put in place to help safeguard Employees from Workplace Violence (both terms as defined below).

Scope and Responsibilities

This Policy and its related procedures apply to members of the Board of Directors of 407 International Inc. (the “**Board**”) and to employees, contractors, consultants, suppliers, representatives and agents (collectively “**Employees**”) of 407 ETR. This Policy forms part of and is incorporated by reference into 407 ETR’s Code of Conduct and, as such, the Board is responsible for its approval and the overall monitoring of its effectiveness and compliance therewith.

Policy

Workplace Violence impacts, among others, Employees and their ability to perform their work. Incidents of Workplace Violence (including incidents in any work-related and/or 407 ETR social function) are not to be ignored by any Employee. Employees are responsible for assisting in maintaining a safe and secure work environment and, to that end, are responsible for following this Policy and its related procedures.

407 ETR does not tolerate any degree or type of violence and any act of Workplace Violence will be dealt with in accordance with this Policy. For the purposes of this policy Workplace Violence means:

- a. the exercise of, or the attempt to exercise physical force by a person against an Employee, in the workplace, that causes or could cause physical injury to the Employee, and
- b. a statement or behaviour that is reasonable for an Employee to interpret as a threat to exercise physical force against an Employee, in a workplace, that could cause physical injury to the Employee.

Examples of Workplace Violence include, but are not limited to:

- Threatening behaviour - such as shaking fists, destroying property, or throwing objects.
- Verbal or written threats - any expression of intent to inflict harm.
- Physical attacks - hitting, shoving, pushing, or kicking.
- Other Actions or behaviour - any act such as swearing, and insulting or aggressive language that would cause a person to reasonably fear the occurrence of violence.

This Policy will be reassessed as often as is necessary, and, at a minimum, annually to ensure the policy and procedures established thereunder continue to contain appropriate measures and procedure and:

- to control the risks identified in the annual risk assessment referred below, as likely to expose an Employee to physical injury,
- for summoning immediate assistance when Workplace Violence occurs or is likely to occur, or when a threat of Workplace Violence is made,

- for Employees to report incidents or threats of Workplace Violence to their supervisor or 407 ETR management, and
- on how 407 ETR will investigate and deal with incidents, complaints or threats of Workplace Violence, including any prescribed elements.

407 ETR shall advise 407 ETR's Health and Safety Committee of the results of the reassessment, and provide a copy of the written assessment to that Committee.
(See: Procedures for Prevention of Workplace Violence - #005A)

This Policy shall be posted at a conspicuous place in the workplace. 407 ETR shall assess the risks of Workplace Violence that may arise from the nature of the workplace or the type or conditions of work. This assessment shall take into account:

- i. circumstances that would be common to workplaces similar to that of 407 ETR,
- ii. circumstances specific to 407 ETR's workplace, and
- iii. any other prescribed elements relevant to 407 ETR.

As part of its Workplace Violence Prevention Program, 407 ETR will provide information, instruction (including supervisory level instruction) and training to ensure all Employees are aware of their rights and responsibilities, including but not limited to:

- Senior Management's position on Workplace Violence,
- any risk factors identified with work areas, and
- procedures to follow if Workplace Violence occurs.

In addition to general employee training, supervisory training is extremely important in the development of sound approaches to creating a healthy, productive workplace to prevent potentially violent situations. Understanding effective interventions may be the difference between a difficult situation and a violent situation.

If an employer becomes aware, or ought reasonably to be aware, that domestic violence that would likely expose a worker to physical injury may occur in the workplace, the employer shall take every precaution reasonable in the circumstances for the protection of the worker.

407 ETR will provide Employees with any information, including personal information, that is reasonably necessary to protect Employees from physical injury, related to a risk of Workplace Violence from a person with a history of violent behaviour if,

- i. Employees can be expected to encounter that person in the course of their work, and
- ii. the risk of Workplace Violence is likely to expose the Employees to physical injury.

407 ETR's policy is to immediately contact the police where there is evidence that a physical attack has or is occurring, whether such attack is between Employees or between Employees and non-Employees.

Policy Guidelines

To support this Policy, Employees must abide by the following guidelines and processes:

Incidents of Workplace Violence should be reported to your manager, department head or the Human Resource Department. If such violence involves a member of the Board (as defined below), the incident should be reported to the President and Chief Executive Officer. If such violence involves the President and CEO, the incident should be reported to the VP of Human Resources who will report it directly to the Chair of the Board.

All formal complaints of Workplace Violence that have been filed will be kept strictly confidential, to the extent possible, so long as it does not hinder or frustrate the investigation, reporting or disciplinary process.

Section - Human Resources**Title: Workplace Violence Prevention Policy****Number: 005**

In the case of complaints of Workplace Violence involving Employees, the Human Resource Department will complete a thorough investigation. If the allegations against an Employee are substantiated, immediate action will be taken up to and including termination, as considered appropriate; and the incident will be recorded in that Employee's file for a specified period of time.

In the case of complaints of Workplace Violence involving a member of the Board, the President and Chief Executive Officer shall notify the Chair of the Board, who will ensure that a thorough investigation is conducted and, if allegations are substantiated, will take immediate appropriate disciplinary action, including requiring the resignation of that member from the Board.

In the case of a complaint of Workplace Violence involving the President and CEO, the Chair of the Board, will ensure that a thorough investigation is conducted and, if allegations are substantiated, will immediately take such action as the Board considers appropriate.

In the case of complaints of Workplace Violence involving customers or other non-employees, the Employee shall notify their supervisor and/or security officer. The Employee will be immediately removed from the situation and the police shall be contacted, if there is physical violence or it appears the situation is worsening and that it is reasonably likely that physical violence will occur.

Subject to the immediate preceding paragraph, until an investigation is completed, the affected Employee shall remain:

- i. in a safe place that is as near as reasonably possible to his or her work station, and
- ii. available to the appropriate investigative personnel or department for purposes of the investigation.

When an Employee raises a complaint of Workplace Violence, no documentation whatsoever will be placed in that Employee's file where the complaint is filed in good faith, whether the complaint is upheld or not. However, falsely accusing someone of violence in the workplace is a serious matter and is subject to disciplinary action, up to and including suspension or termination.

Managers or department heads who fail to take appropriate corrective action, when made aware of Workplace Violence, will themselves be subject to appropriate disciplinary action, up to and including suspension or dismissal.

407 ETR Employees should be aware that they have the right to contact the Ontario Human Rights Commission to file a complaint. However employees are encouraged to first follow the steps set out in this policy to report issues of Workplace Violence.

An Employee may refuse to work or do particular work where he or she has reason to believe that Workplace Violence may occur. The right to refuse unsafe work process will work in accordance with the Occupational Health and Safety Act (Ontario).

Exceptions

Any exceptions will be identified and approved as per the process set out in the [Policy and Procedure Process Guide](#)

Policy Maintenance

Standard maintenance and review as per the process set out in the [Policy and Procedure Process Guide](#)

Policy Owner

Vice President, Human Resources.

Related Policies

[001 - Workplace Harassment and Discrimination Policy](#)

Related Procedures

[005 A - Workplace Violence Prevention Procedures](#)

Related Forms

[Workplace Violence - Incident Report Form](#)

[Workplace Violence - Risk Assessment Questionnaire](#)

Related Scripts

[Bill 168 - An Act to amend the Occupational Health and Safety Act](#)

[Ontario's Occupational Health and Safety Act](#)

Revision History

Date	Version number	Modifications
May 10, 2010	1.0	Policy drafted and issued as a result of new legislation – Bill 168 An Act to amend the Occupational Health and Safety Act with respect to violence and harassment in the workplace and other matters
March 12, 2014	2.0	Annual review completed by HR and Legal Department, no material change to content. Changed all occurrences of Chairman to “Chair”.
August 21, 2015	3.0	Annual review completed by HR. Minor wording revisions, replaced “Chairman” with “Chair” . No material change to policy content.
August 2, 2016	4.0	Annual review completed by HR and BPM, no material changes to policy.
July 4, 2017	5.0	Annual review completed by HR and BPM, no material changes to policy.

Policy Authorization

Approvers	Approval Date
Jose Tamariz President and Chief Executive Officer	May 5, 2010
Ken Walker Chief Financial Officer	May 10, 2010
Wayne Anthony V.P. Human Resources	May 7, 2010
Murray Paton General Counsel	May 6, 2010

Note. Completion of the SharePoint workflow by the individuals above is evidence of approval of this document. Workflow approval for this document is available in SharePoint.