MONTRUSCO BOLTON

Policy against harassment

Introduction

Montrusco Bolton affirms that mutual respect and dignity is one of its core corporate values and is committed to maintaining a harmonious workplace, as well as an environment that is consistent with its mission.

Montrusco Bolton believes that all forms of harassment adversely affect the victim's dignity and physical or psychological integrity. Several legal instruments directly or indirectly prohibit harassment, including the Charter of Human Rights and Freedoms, the Act Respecting Labour Standards, the Civil Code of Québec, and the Act Respecting Occupational Health and Safety.

Accordingly, any form of harassment toward our employees or those who use our services is unacceptable and will be subject to disciplinary action. Through their behaviour, all employees are therefore responsible for helping maintain a workplace free of psychological harassment, and Montrusco Bolton is committed to preventing workplace psychological harassment and putting an end to it when notified of any occurrence.

Definition of harassment:

1- "Discriminatory harassment": harassment based on any of the grounds listed in section 10 of Quebec's Charter of Human Rights and Freedoms, namely race, colour, sex, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, a handicap or the use of any means to palliate a handicap.

2- "Psychological harassment": any vexatious behaviour in the form of repeated and hostile or unwanted verbal comments, actions or gestures, among others, that adversely affects an employee's dignity or psychological or physical integrity, and that results in a harmful work environment for the employee. A single serious incidence of such behaviour may also constitute psychological harassment if it leads to such a result and has a lasting harmful effect on an employee.

3- "Sexual harassment": any behaviour in the form of repeated and unwanted verbal comments, actions or gestures of a sexual nature that adversely affects an employee's dignity or psychological or physical integrity, and that results in a harmful work environment for the employee. A single serious incidence of such

behaviour may also constitute sexual harassment if it leads to such a result and has a lasting harmful effect on an employee.

Forms:

1- All forms of harassment may occur between individuals of different or similar status.

2- Harassment may take the following forms:
   a) Intimidation, threats, blackmail or coercion;
   b) Repeated insinuations, unfounded accusations, insults or humiliation, repeated attempts to exclude or isolate, screaming or shouting;
   c) Systematic breaches of normal work conditions, or willful damage to work areas or tools;
   d) Abuse of power, or official or unofficial authority, to threaten an employee's job or compromise his or her performance.

3- Sexual harassment may take the following forms:
   a) Implicit or explicit promises of rewards given to obtain consent to a request of a sexual nature;
   b) Implicit or explicit threats of reprisals, whether or not they are carried out, made to obtain consent to a request of a sexual nature, or made following a refusal to consent to such a request;
   c) Comments or behaviours of a sexual nature that may reasonably be perceived as creating a negative work environment.

What doesn't constitute harassment:

Any relevant action relating to company management, performance management or disciplinary measures does not constitute harassment. Similarly, appropriate and respectful social interactions, along with jokes taken with good humour by all parties involved, do not constitute harassment.

Assistance and complaint management processes:

Employees who feel they are the victims of inappropriate or malicious acts or behaviours may confidentially contact Karine Gareau and ask her to intervene to quickly resolve the issue.

If you still feel you're being victimized, you may file a written complaint with management. You will need to provide detailed information on all vexatious behaviour. An investigation will then be conducted, and a decision rendered as soon as possible following the end of the investigation. All complaints are processed confidentially.

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Disciplinary action

Any employee who violates this harassment policy will be subject to disciplinary action, up to and including dismissal. Any disciplinary action taken will be based on the impact and seriousness of the violation, as well as on the record of the employee.

Montrusco Bolton Investments Inc.
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