



## ANTI-DISCRIMINATION, PREVENTION OF HARASSMENT AND PREVENTION OF WORKPLACE VIOLENCE POLICY

### PURPOSE

Interfor expects all its personnel to behave professionally at all times, to comply with all laws applicable to the Company, and to treat one another with dignity and respect. Discrimination, harassment and workplace violence are not acceptable or tolerated by Interfor, and retaliation against those who report such conduct or participate in an ensuing investigation, is prohibited. The purpose of this Anti-Discrimination, Prevention of Harassment and Prevention of Workplace Violence Policy ("**Policy**") is to define conduct that is prohibited, and to provide employees who believe they have been the target of prohibited conduct with a framework to report it.

### APPLICATION

This Policy applies to Interfor Corporation and all its subsidiaries (collectively "**Interfor**"), and each of their directors, officers, members, employees (permanent and temporary), contractors, consultants and agents when working in or related to any Interfor workplaces ("**Personnel**").

### POLICY

#### 1. Definitions

"**harassment**" is defined as improper conduct by an individual, that is directed at and offensive to another individual in or related to the workplace, including offices, facilities, operations, or online or at any events related to work, and that the individual knew or ought reasonably to have known would cause offence, humiliation, intimidation, or harm. It includes objectionable acts, comments, or displays that demean, belittle, or cause personal humiliation or embarrassment, and any act of intimidation or threat. It also includes sexual harassment and any improper conduct related to any Protected Characteristics of an individual. Conduct does not have to be directed at a certain person, or be intentionally offensive, to be considered harassment.

"**discrimination**" is the unjust or prejudicial treatment of an individual on the grounds of any Protected Characteristics. It includes any adverse employment actions based on a Protected Characteristic such as hiring, promotion, termination, and compensation decisions, but does not include initiatives to promote diversity and inclusion in the workplace.

"**sexual assault**" is unwanted conduct of a sexual nature that is inflicted on a person or compelled through the use of physical force, manipulation, threat, or intimidation.

"**sexual harassment**" is a form of harassment and includes, but is not limited to, unwanted sexual advances, requests for sexual favors and suggestive or offensive comments that are directed toward an individual because of that individual's sex.

"**workplace violence**" means the attempted or actual exercise by a person of any physical force so as to cause injury to a worker, and includes sexual assault and any threatening statement or conduct which gives a worker reasonable cause to believe that they are at risk of injury.

“**Protected Characteristics**” include an individual’s race/ethnicity, color, ancestry, place of origin/national origin, citizen or immigration status, political belief, religion, marital status, family status, physical or mental disability, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), sexual orientation, gender identity or expression, military or veteran status, age, workers’ compensation status, genetic information, family medical history, creed, expunged juvenile conviction, or conviction for a criminal or summary conviction offence that is unrelated to employment, and any other status protected by national/federal, state, provincial, or local non-discrimination law.

## **2. Prohibition of Discrimination, Harassment and Workplace Violence**

Discrimination, harassment and workplace violence are prohibited at Interfor’s workplaces. This Policy also prohibits any form of retaliatory action toward an employee for complaining of any conduct that they believe in good faith violates this Policy, or for participating in any investigation of such a complaint. Interfor’s workplaces include Company offices, facilities, operations, online or at any events related to work, traveling on behalf of the Company, or any other medium through which Company business is conducted.

Examples of the types of conduct prohibited by this Policy include:

- improper conduct or comments by a person towards any Personnel that the person knew or reasonably ought to have known would cause such Personnel to be humiliated or intimidated;
- verbal or physical abuse, threats, violence, insults or intimidation and subtler forms of harassment such as belittling conduct, offensive non-verbal gestures, ignoring or isolating a person, vandalizing personal belongings, and spreading malicious rumors;
- non-verbal harassment, including but not limited to suggestive or insulting sounds, obscene gestures, leering or whistling; and
- visual harassment, including but not limited to displays of explicit or offensive calendars, circulation of derogatory content, posters, pictures, drawings or cartoons that reflect disparagingly upon a class of persons or a particular person.

This Policy does **not** prohibit the following:

- workplace supervision, coaching, discipline, direction and management undertaken in a good faith manner for a legitimate work purpose; and
- interpersonal conflict that is not abusive or threatening.

## **3. Responsibilities**

All Interfor Personnel are expected to:

- not engage in any conduct prohibited by this Policy;
- not to conduct themselves in a manner that they knew or reasonably ought to have known would cause others to be offended;
- promptly report breaches or suspected breaches of this Policy;
- comply with this Policy including fully cooperating with investigations into potential breaches;
- promptly address interpersonal conflict before it escalates or interferes with safety and productivity;
- comply with any applicable Occupational Health & Safety policies, procedures and laws; and
- immediately remove themselves from an unsafe situation if at all possible and inform your leadership, supervisor, safety coordinator, or Human Resources immediately. If the situation is serious enough, contact 911.

In addition, all employees are encouraged to document any incidents involving discrimination, harassment and workplace violence and to share that documentation with their leadership, safety coordinator, supervisor or with Human Resources.

#### **4. Reporting Prohibited Conduct**

When any Personnel encounters prohibited conduct, they should verbally report the allegations to their leadership, supervisor or Human Resources. Interfor Personnel may also choose to report the allegations contacting the confidential whistleblower hotline (1-844-449-9988 toll free from North America, or +1-604-681-2175 worldwide) or email address (whistleblower@interfor.com). Complaints should be reported as soon as possible after experiencing or witnessing an incident. Incidents of workplace violence must be reported immediately.

Personnel making a complaint are encouraged to provide as much information as possible, including the names of individuals involved, witnesses (if any), where the event(s) occurred, when they occurred, what conduct led to the complaint and provide any supporting documents, such as emails, notes, photos or videos.

Interfor will keep complaints confidential, to the extent reasonable in the circumstances.

#### **5. Handling Complaints**

Any leader, supervisor or other member of management who receives a complaint under this Policy must report the complaint to Human Resources. If Human Resources is the subject of the complaint, then the complaint should instead be reported to the General Counsel and Corporate Secretary.

If there is a sufficient basis in the written complaint or Interfor otherwise deems it appropriate to do so, Interfor will carry out an investigation, using either an internal or external investigator. The investigation will be conducted confidentially to the extent reasonable in the circumstances, and in a fair, thorough and impartial manner. Information gathered during the investigation generally will be disclosed to persons only as necessary to carry out a proper investigation, address the findings from the investigation, and for Interfor to carry out its legal obligations or policies. The complainant and respondent will be advised when the investigation has concluded.

This procedure is intended to be flexible to respond to the specific circumstances of a complaint. Interfor reserves the right to engage in a different procedure as deemed appropriate in any given circumstance.

#### **6. Consequences**

Any Personnel found to have discriminated against or harassed any other Personnel, or found to have engaged in workplace violence, is subject to discipline which may, dependent on the circumstances, include immediate termination of employment or services. Interfor may also take other forms of corrective action, such as additional training.

Any Personnel who bring a false, reckless or malicious complaint will also be subject to discipline up to and including immediate termination of employment or services.

Any Personnel who retaliate against an individual for bringing a complaint of discrimination,



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harassment, or workplace violence or participating in an investigation of such a complaint, is subject to discipline up to and including immediate termination of employment or services.

### 7. Oregon Legal Notice

Oregon state law provides that employees may have up to five years from the date of the violation to bring legal action based on alleged discriminatory conduct prohibited by Oregon statutes found at ORS 659A.030, 659A.082, or 659A.112. Under Oregon law, Interfor cannot require or coerce an Oregon employee to enter into a non-disclosure, non-disparagement, or no-rehire agreement.

A non-disclosure agreement is an agreement not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or workplace violence. A non-disparagement agreement is an agreement not to discredit or make negative or disparaging written or oral statements about the Company or any other party. A no-rehire agreement is an agreement to not seek re-employment with the Company. However, an employee claiming to be aggrieved by unlawful discrimination, harassment, or workplace violence may *voluntarily* request to enter into a non-disclosure, non-disparagement, or no-rehire provision and will have seven days to revoke any such agreement.

### 8. Administration and Interpretation

**Policy Modifications.** This Policy is subject to ongoing review and evaluation, and modifications will be made as deemed necessary to respond to circumstances and evolving needs of Interfor. You are responsible for regularly reviewing its terms and conditions.

**Conflicts.** Where there is a conflict or overlap between this Policy and the Code of Conduct, this Policy governs.

**Interpretation.** Interfor's Senior Vice President, Human Resources is responsible for the interpretation of this Policy. All questions regarding this Policy are to be referred to Interfor's Senior Vice President, Human Resources.

### 9. References

In addition to this Policy, Interfor Personnel shall ensure their compliance with the following Interfor policies:

- Code of Conduct & Ethics
- Human Rights Policy
- Whistleblower Policy

**END OF POLICY**