

Respectful Workplace Policy

(including Workplace Violence Prevention)



Purpose

GO SALES is committed to building and preserving a safe and healthy workplace and leveraging the diversity of thought that exists within our teams with the goal of fostering a universal sense of belonging at work. Unacceptable Behaviour (defined in Appendix A: Definitions) is not acceptable or tolerated in GO SALES' workplace.

This Respectful Workplace Policy is designed to:

- Promote equality, respect and dignity in the workplace
- Maintain a working environment that is free of Unacceptable Behaviour, including Harassment, Discrimination and Workplace Violence (as defined in Appendix A: Definitions), and
- Establish a mechanism under which complaints may be brought forward and dealt with

This Policy is designed to address Worksafe BC obligations and other applicable Human Rights, and Occupational Health and Safety legislation.

Who does the Policy apply to?

This Policy applies to Go Sales Holdings Ltd.'s and its subsidiaries' (collectively "**GO SALES**") directors, officers, employees (permanent and temporary), contractors, consultants and agents when working in or related to any GO SALES workplaces (collectively "**team members**"). This Policy complements GO SALES' Code of Conduct & Ethics ("**Code**"). You can find the Code at <http://www.gosales.co/ethics>

While customers, suppliers, and other stakeholders are not directly subject to our internal policies, GO SALES expects respectful and non-discriminatory behaviour from them, as we do from our own team members. GO SALES is committed to taking reasonable measures to prevent Unacceptable Behaviour in the workplace.

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.

Examples include:

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

What are the expectations of team members at GO SALES?

All team members are expected to:

- not engaging in Unacceptable Behaviour of any kind
- 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 to Unacceptable Behaviour or interferes with safety and productivity
- complying with all applicable Occupational Health & Safety laws and this Policy

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In addition, all team members are encouraged to document any incidents involving Unacceptable Behaviour and to share that documentation with their leader or Human Resources.

Team members are encouraged to contact their leader, Human Resources or Leadership team, including the President, if they have any questions about their rights or responsibilities under this Policy.

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 (as defined in Appendix A), a breach of confidentiality, or Retaliation (as defined in Appendix A) for a complaint – is not acceptable and may result in discipline up to and including termination of employment or services.

What are Unacceptable Behaviours that would violate the Policy?

Typically, Unacceptable Behaviour is any words, gestures or behaviours that could reasonably cause offence, humiliation, intimidation, 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”) or adopting a behaviour that is discriminatory in any way
- Displaying or sharing offensive literature or material, 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
- Making a hiring decision based on age or gender, when not based on a true job requirement

HANDLING OF COMPLAINTS

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. 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 your leader, Human Resources or the Leadership team, including the President.

How will concerns or complaints of Unacceptable behaviours be handled?

Informal Complaint Process

A request for support or guidance regarding concerning or potentially Unacceptable Behaviour may be brought to a leader, Human Resources representative or Leadership team, including the President, 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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Formal Complaint Process

Step 1: When a team member encounters Unacceptable Behaviour, they must report, verbally or in writing, the allegations to their leader, Human Resources or the Leadership team. If the conduct involves the leader, or the leader is unavailable, the allegations should be reported, in writing, to Human Resources or the Leadership team. Complaints should be reported as soon as possible after experiencing or witnessing an Unacceptable Behaviour. Incidents of workplace violence must be reported immediately.

A team member making a complaint should provide as much information as possible, including the names of people involved, witnesses (if any), where the event(s) occurred, when they occurred and what behavior or words led to the complaint and attach any supporting documents, such as emails, notes, photos or videos. If a team member does not want to provide a complaint, GO SALES may still initiate a formal investigation at its discretion if deemed necessary to ensure the health and safety of persons at the workplace or comply with its legal obligations.

Step 2: If there is a sufficient basis in the written complaint or GO SALES otherwise deems it necessary to do so, GO SALES will carry out an investigation, using either an internal or external investigator(s). The investigation will be fair and impartial, and will be confidential. Information gathered during the investigation will be disclosed to persons only as necessary to carry out a proper investigation, address the findings from the investigation, and for GO SALES to carry out its legal obligations.

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

Training

All team members will complete training on fostering a Respectful Workplace within [three (3)] months of their hire date.]. Additional training may be provided as determine 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

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- Any disclosure of personal information will be restricted to the minimum amount necessary in the circumstances.
- A team member must not:
 - o Disclose the name of any party involved in a complaint or the circumstances related to the complaint
 - o 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 Human Resources department. Records related to any corrective action may also be maintained in personnel files.

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 GO SALES. You are responsible for regularly reviewing its terms and conditions.

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

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 GO SALES 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.

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.

Discrimination

Discrimination means a distinction, exclusion or preference, 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.

Harassment

Any conduct, comment, display, action or gesture by a person, including conduct of a sexual nature or bullying, towards a team member, that the person knew or reasonably ought to have known would cause that team member to be offended, humiliated, intimidated or cause other physical or psychological injury or illness 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. Conduct may be found to constitute Discriminatory Harassment even if the person responsible for the conduct did not intend to harass or offend.
- Is objectionable or unwelcome, including in circumstances where the person knew or reasonably ought to have known the conduct would be unwelcome
- Is marked by the intentional or persistent attempt of one or more persons to threaten, intimidate, demean, torment, control, sabotage, mentally or physically harm or isolate a person or group of persons
- Violates a person’s right to respect, dignity and protection of physical or psychological integrity
- Is prescribed or defined specifically in applicable legislation

To constitute harassment there must be: a) repeated conduct, comments, displays, actions or gestures; or b) a single serious occurrence of conduct, or a single serious comment, display, action or gesture, that has a lasting, harmful effect on a person. Behaviour need not be intentional in order to be considered harassment.

Bullying and harassment DOES NOT include:

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- Workplace supervision, direction and management undertaken in a good faith manner for a legitimate work purpose
- Work-related interpersonal conflict that is not abusive or threatening or deprecating towards another person

Sexual Assault

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

Sexual Harassment is a form of Discrimination and Harassment and includes, but is not limited to, 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.

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.

Inappropriate Conduct

At GO SALES, 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 GO SALES values and our aspiration to create a workplace that values respect, civility, diversity, and inclusiveness
- Are not included within Good Faith actions taken by GO SALES relating to the management and direction of team members or the workplace

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 under applicable legislation; 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 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.