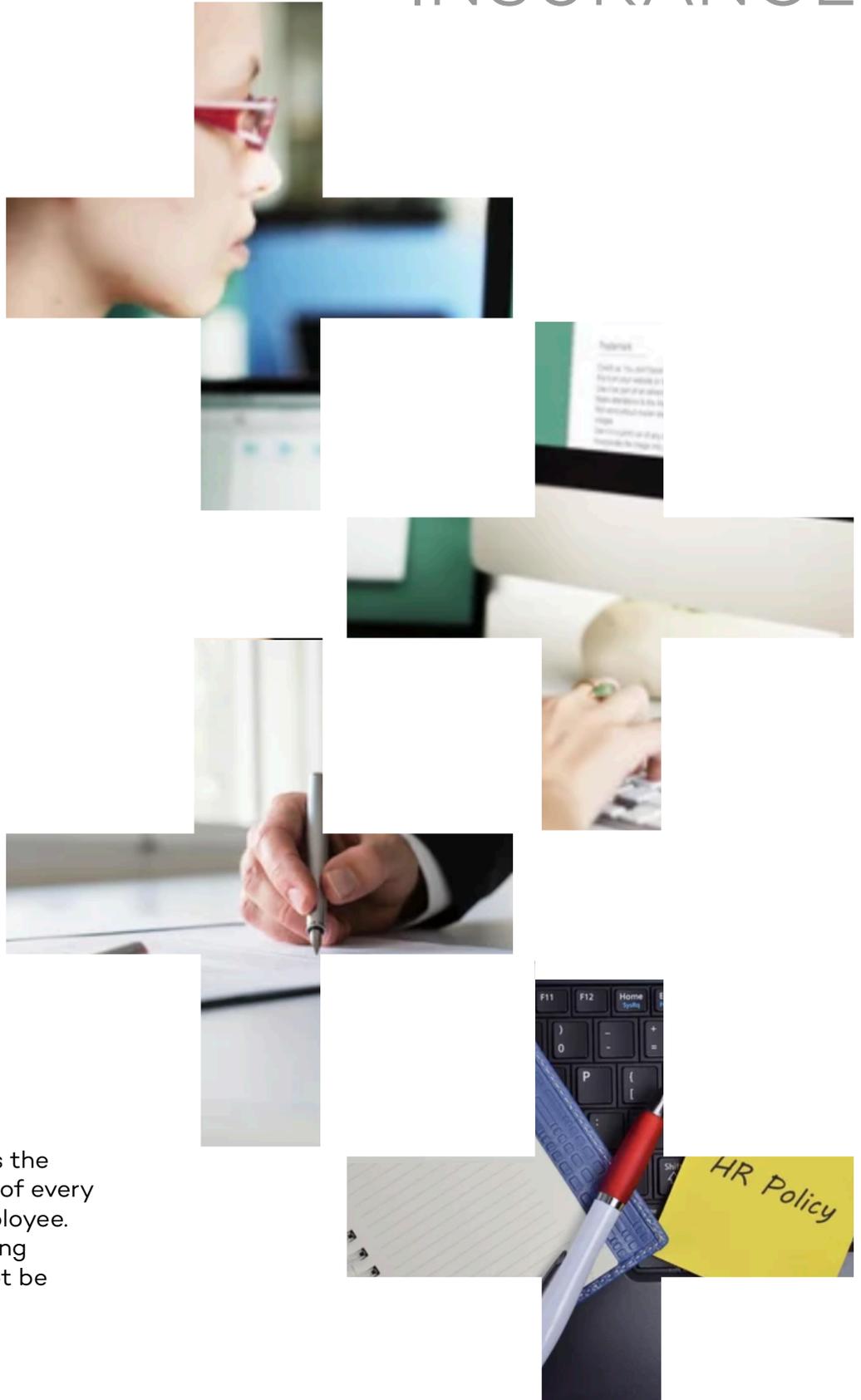


Workplace Policy

Ing+
McKee
INSURANCE



Policy Statement

The demonstration of respect is the commitment and responsibility of every Ing & McKee Insurance Ltd. employee. Inappropriate behaviour, including bullying and harassment, will not be tolerated in our workplace.

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Respectful Workplace Policy for Ing & McKee Insurance Ltd.

Policy Statement

The demonstration of respect is the commitment and responsibility of every Ing & McKee Insurance Ltd. employee. Inappropriate behaviour, including bullying and harassment, will not be tolerated in our workplace.

Definitions

Bullying

Is a repeated pattern of negative behaviour aimed at a specific person or group.

Workplace harassment

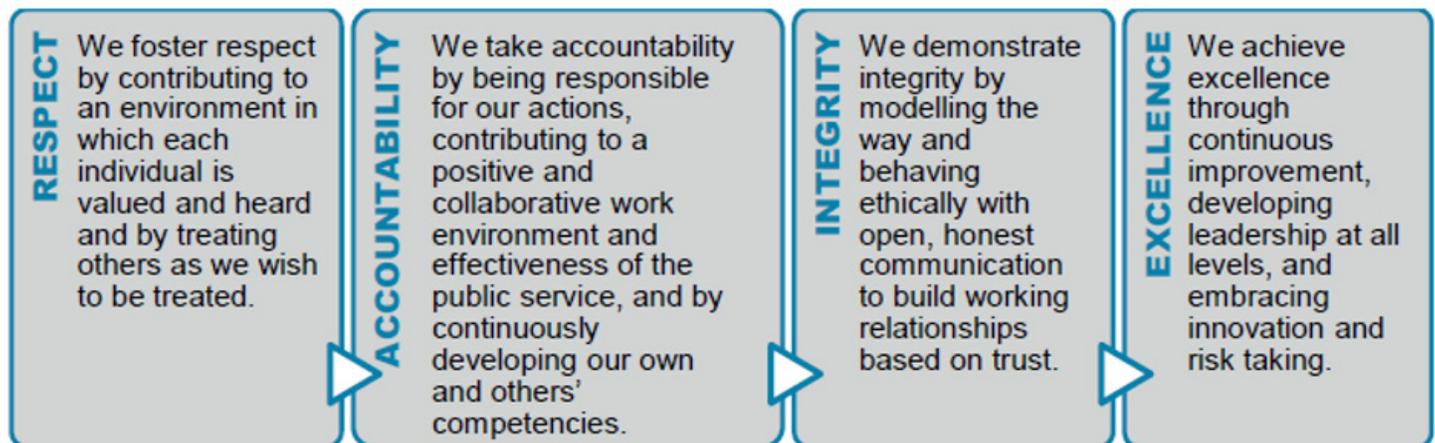
Is unwelcome conduct based on race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation of that person or of any other person.

Violence (workplace violence)

According to the Occupational Health and Safety Code, Part 1: “whether at a worksite or work related, means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical injury.” Employees must notify their supervisor of all incidents of workplace violence even if there was no physical injury as per the Government of Alberta Occupational Health and Safety Program.

Guiding Values

Ing & McKee Insurance Ltd. is committed to sustaining a corporate environment where employees feel engaged and are happy to come to work. This commitment is further supported by the Ing & McKee vision of proudly working together to build a stronger community and provide excellent service and professional advice to clients in those communities where we do business and beyond. We recognize the following values:



These values provide a common understanding of the behaviours expected of all of us at Ing & McKee Insurance Ltd. They describe how we go about doing our best work and ensure that

this is as important as delivering on our targets.

Responsibilities

1. We are all responsible for ensuring that our actions and words contribute to a respectful work environment.
2. We are all accountable for the results of our actions, regardless of our intent.
3. We all understand that disrespectful behaviours will not be tolerated.
4. Whenever appropriate, we will address issues of disrespectful behavior with the person or people directly involved.

For more detailed information regarding the application of the Respectful Workplace Policy, please reference the Understanding Our Respectful Workplace Policy Guidebook.

Guiding Values

Disrespectful behaviour, including bullying and harassment, will not be tolerated in our workplace.

Guiding Values

Ing & McKee Insurance Ltd. is committed to sustaining an organization where employees feel engaged and are happy to come to work. Our Respectful Workplace Policy provides a foundation to achieve this commitment.

Disrespectful behaviour, including bullying and harassment, will not be tolerated in our workplace.

Employees should enjoy working in a respectful and professional environment where their contributions are valued and they are treated with dignity and fairness.

The Respectful Workplace Policy is supported by the Ing & McKee Insurance Ltd. vision of proudly working together to build a stronger value proposition for clients, and support of the following Ing & McKee values:

Respect

We foster respect by contributing to an environment in which each individual is valued and heard and by treating others as we wish to be treated.

Accountability

We take accountability by being responsible for our actions, contributing to a positive and collaborative work environment and effectiveness of the organization, and by continuously developing our own and others' competencies.

Integrity

We demonstrate integrity by modelling the way and behaving ethically with open, honest communication to build working relationships based on trust.

Excellence

We achieve excellence through continuous improvement, developing leadership at all levels, and embracing innovation and risk taking.

These values provide a common understanding of the behaviours expected of the Ing & McKee Insurance Ltd. team. They describe how we go about doing our best work and ensure that this is as important as achieving our objectives.

Responsibilities

1. We are all responsible for ensuring that our actions and words contribute to a respectful work environment.
2. We are all accountable for the results of our actions, regardless of our intent.
3. We all understand that disrespectful behaviours will not be tolerated.
4. Whenever appropriate, we will address issues of disrespectful behavior with the person or people directly involved.

Intent

Ing & McKee Insurance Ltd. is an organization that seeks to foster an environment in which each individual is valued and heard. We sometimes hear people attempt to excuse disrespectful behaviours by saying “that’s just the way they are” or “they didn’t mean it”. However, it is important that everyone take into consideration how their actions impact others.

The intent of the behaviour is not as relevant as the impact the behaviour has on the individual.

Whether the behaviour was intentional or not may be difficult to determine. Certainly if it is found that someone has willfully done something to harm a co-worker, subordinate or someone they report to, this will be considered a serious aggravating factor in determining whether discipline is appropriate.

Workplace Bullying

Bullying is a repeated pattern of negative behaviour aimed at a specific person or group.

The ownership, management, and employees of Ing & McKee Insurance Ltd. are committed to having a safe and respectful workplace where discrimination, harassment and bullying will not be tolerated.

Workplace Harassment

Workplace harassment is unwelcome conduct based on race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation of that person or of any other person.

Workplace harassment may include a single incident or a series of events.

Workplace Violence

According to the Occupational Health and Safety Code, Part 1, workplace violence means: “The threatened, attempted or actual conduct of a person that causes or is likely to cause physical injury”.

Employees must notify their supervisor of all incidents of workplace violence even if there

was no physical injury as per the Government of Alberta Occupational Health and Safety Program. Examples of workplace violence include the following:

- Threatening behaviour such as shaking fists, destroying property or throwing objects
- Verbal or written threats (any expression of intent to cause harm)
- Physical attacks such as hitting, shoving, pushing or kicking

Continuum of Behaviours

It can be difficult to isolate workplace behaviours into strict categories of acceptable or unacceptable. Often times, real life encounters expose us to behaviours that fall somewhere in the middle of these two categories. To better understand the expectation of working together with respect, it is helpful to imagine a continuum of behaviours where one end demonstrates our ideal state of interaction and the other end demonstrates unacceptable behaviours. For example, being kind would be on one end of this continuum and bullying and harassment would be on the opposite end. This continuum concept shows us that it is less important to evaluate behaviours against a strict definition of harassment, or bullying, and more important to evaluate whether an action or inaction has negatively (or positively) impacted someone else. The following are examples of behaviours that fall at either end of the continuum. An opportunity exists to intervene or self-correct if we find that behaviours are moving away from those identified as contributing to our ideal state. For a visual example of the continuum of behaviours, please refer to **Appendix 4**.

Respectful Behaviours

The following behaviours describe our ideal state of interaction. Taking time to ensure we are all exemplifying the following behaviours will move us closer to achieving the respectful workplace we are trying to create:

- Allowing one person to speak at a time
- Expressing appreciation
- Being accountable for your own mistakes
- Seeking input from others
- Being asked for an opinion
- Praising good work
- Giving timely recognition of people's efforts and accomplishments
- Providing positive reinforcement
- Offering assistance when someone needs help
- Saying "please" and "thank you"
- Communicating openly
- Providing opportunities for input and participation
- Giving constructive feedback
- Demonstrating sympathy and a show of support when someone is having a difficult time
- Listening openly to other points of view, even when you disagree
- Seeking consensus
- Providing clear expectations
- Sharing knowledge and information
- Being inclusive
- Mentoring/coaching: Taking the time to develop others
- Acting honestly

- Empowering others
- Sharing laughs
- Social banter

Disrespectful Behaviours

Understanding the types of behaviours that can be considered disrespectful is the key to identifying these behaviours when we see them being displayed, and in turn, evaluating and adjusting our own actions accordingly. Demonstrating the following behaviours in our workplace can negatively impact individuals' self-worth. Therefore, it is important to note the following behaviours and ensure that we do not demonstrate or tolerate them in our workplace:

- Eye rolling, finger wagging, or other physical gestures that are used to make fun of, express frustration with, or isolate another employee
- Workplace violence/assault
- Intimidation, leering or other objectionable and insulting gestures
- Threats including coercion
- Angry outbursts
- Unwanted physical contact such as touching, patting, pinching or punching
- Display of pornographic, racist or offensive pictures or materials
- Taunting, ridiculing or belittling
- Unwelcome remarks, jokes, innuendo or taunting about a person's race, religious beliefs, colour, gender, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation of that person or of any other person
- Abuse of authority that undermines someone's performance or threatens his or her career
- Spreading false information about an employee
- Practical jokes that result in awkwardness or embarrassment
- Unwelcome enquiries or comments about an individual's personal life
- Unwelcome remarks about a person's physical attributes or appearance
- Humiliation in front of others
- Taking credit for someone else's or a team's work
- False accusations of disrespectful behaviour
- Gossiping
- Purposely and/or regularly interrupting people when they are speaking
- Refusing to converse or work with an employee

What are NOT Considered Disrespectful Behaviours?

The following are considered legitimate workplace actions so long as they are carried out in good faith, in a professional manner, and in a non-arbitrary fashion:

- Direct supervision, including discussions about performance expectations
- Assignment of work, and direction on how it is to be accomplished
- Requests by supervisors for updates or status reports
- One-on-one discussions between managers, supervisors and their staff
- Approval or denial of time off

The above noted actions are encompassed by management's legitimate right to run the

business and direct the workforce.

Support for All Employees

An allegation of disrespectful conduct at work is serious and has the potential to significantly impact one's career and/or personal wellbeing. All employees are encouraged to speak to a colleague, supervisor or manager for support or advice when needed. In many instances, open and honest dialogue can go a long way in reaching an informal resolution.

More information regarding the informal and formal resolution options available for all employees is provided in the 'Options for Resolution' section of this guidebook as well as in the Resolution Processes provided in **Appendix 1 and 2**.

False Allegations

Making a false allegation against another employee is a serious offense and is considered another form of disrespectful behaviour that will not be tolerated. False allegations are particularly egregious because they force the accused individuals to defend their integrity. The allegations and subsequent investigation can be traumatic and costly regardless of the findings.

Where accusations are found to be false, disciplinary action may be taken against the person who made the accusation. Disciplinary action may include termination.

"Respect for right conduct is felt by everybody." — Jane Austen

Frivolous Complaints

Allegations that are frivolous in nature may have a serious impact on individuals within the work area. In such instances, all those involved may be subject to an investigation, which they may find frustrating and traumatic. Investigations are often an emotionally charged exercise and the amount of time spent fact finding means time spent away from the valuable work that is being done for the benefit of Albertans. Frivolous complaints may result in disciplinary action against the complainant. Any disciplinary action will be assessed on a case-by-case basis.

This does not imply that employees should avoid dealing with workplace conflict or feel dissuaded from making a complaint about disrespectful behaviour. It does, however, draw attention to the fact that filing a complaint is a serious matter. Therefore, employees are asked to think carefully and not act impulsively when considering filing a complaint. All employees are encouraged to explore the Informal Resolution Process outlined in Appendix 1 before considering a formal complaint. The Informal Resolution Process promotes open dialogue between the parties and this may result in a common understanding and resolution.

Requesting Anonymity or That No Action Be Taken

Approaching your manager with concerns about another employee is not helpful unless you are asking them to address the issue. It is not acceptable for a manager to be asked to

listen to someone who they believe has a serious issue, but then be asked not to do anything about it. Therefore, if you feel the issue is significant enough to bring to the attention of your manager, you should be aware that your manager may take action to ensure the issue will be addressed. Action taken may involve your manager providing you with advice on next steps.

Anonymity will not be granted when a complaint is filed as the respondent has the right to know and respond to the allegations made. That said, efforts will be made to protect confidentiality and respect the privacy of all those involved.

The Role of the Bystander

Employees who witness disrespectful behaviour have a responsibility to take action. Bystanders who do not take action may contribute to creating a toxic work environment. If an employee witnesses other employees acting disrespectfully, there is an expectation that this information will be brought forward for resolution. As stated by Lt. General David Morrison, Australia's Chief of Army, "The standard you walk past is the standard you accept."

Resolution

All employees can contact their manager for more information about the resources available to them when dealing with a disrespectful workplace situation.

Informal Issue Resolution Process (Appendix 1):

- Speak to the individual directly, if possible, or write them a note or send them an email if you are not comfortable speaking to them. These are difficult conversations to have but employees are expected in most instances to do their best to work things out with each other before escalating to a higher level.
- If speaking to the individual does not resolve the issue or if you are not comfortable in approaching the individual, employees can speak to their supervisor or manager. Employees are encouraged to work with their supervisor or manager to develop a plan for how the situation can be addressed moving forward.
- Employees may also speak to their human resources consultant for coaching to assist with these conversations.
- Employees may request their supervisor or manager to assist in coaching/mediating an informal resolution.
- If the matter involves an employee's supervisor, an employee may also bring concerns to their supervisor's manager or alternatively to Human Resources in an effort to find a solution prior to filing a formal complaint. For more information, please reference the Informal Issue Resolution
- Process provided in Appendix 1.
- Failing a successful informal resolution, an employee may consider pursuing the formal complaint process.

Formal Issue Resolution Process (Appendix 2):

- The formal process must be initiated within 30 days from the date of the incident.
- In extenuating circumstances, the Partnership group has the authority to extend timelines.

- A formal complaint can be filed in accordance with the Formal Issue Resolution Process provided in Appendix 2.
- After an initial review of the complaint, it may proceed to an investigation through the Formal Issue Resolution Process, during which all individuals with relevant information to share will be interviewed.
- Once the investigation is completed and the findings are reviewed by the appropriate party as determined by the department, a decision will be made regarding appropriate action.

Looking Forward

“Humankind had not woven the web of life. We are but one thread within it. Whatever we do to the web, we do to ourselves. All things are bound together. All things connect.” —Chief Seattle (1780-1866)

A Respectful Workplace is the responsibility of every employee within Ing & McKee Insurance Ltd. It is an ongoing and evolving process that requires conscious action on a daily basis. Through collective efforts we will continue to move towards a workplace environment where every employee feels valued and engaged and thrives in their workplace.

Questions and Answers

Q: Are there time limits for making a formal complaint?

A: You must do so within 14 days of the alleged incident. The formal process must be initiated within 30 days from the date of the incident. In extenuating circumstances, the Partners have the authority to extend timelines.

Q: Perhaps I am making a big deal out of nothing. How do I know when I should deal with the issue?

A: If someone’s actions have made you feel uncomfortable, the processes as outlined in this guidebook can assist you in addressing the issue and reaching a resolution.

Q: How can joking around be considered inappropriate if I was just having some fun?

A: Humour is healthy, can help relieve tension and create a bond between people. However, humour can get out of hand if it offends others and/or hurts feelings. Get to know your colleagues so that you can better understand where that line is drawn. Every person has a different way of dealing with certain subject matters and every workplace has their own unique cultural norms. Take note of your work environment and err on the side of caution with humour.

Q: How do I let someone know that they have done something that offends me?

A: A good course of action is to ask to speak to the individual in private and to explain to them what they did, how it made you feel and why. Clarify how you propose moving forward or what you need to see change. Communicate that if the behaviours continue, you will escalate.

Q: What options do I have in dealing with disrespectful behaviour?

A: The sooner you do something the better. Not doing anything is condoning the behaviour and the person may not know that what they are doing is impacting you. You can:

- Tell the person to stop
- Write them a note or send them an email if you are not comfortable speaking to them
- Speak to a colleague, supervisor, manager, union representative or Human Resources
- Contact the Peer Resource Network by phone or email for more information
- File a formal complaint if you cannot resolve this matter informally

Q: Do I have to wait for something serious to happen to do anything?

A: Disrespectful behaviour, including bullying and harassment, often occurs incrementally in small doses over time. You do not have to wait for a culminating incident to do something. It is best to deal with the situation as it arises.

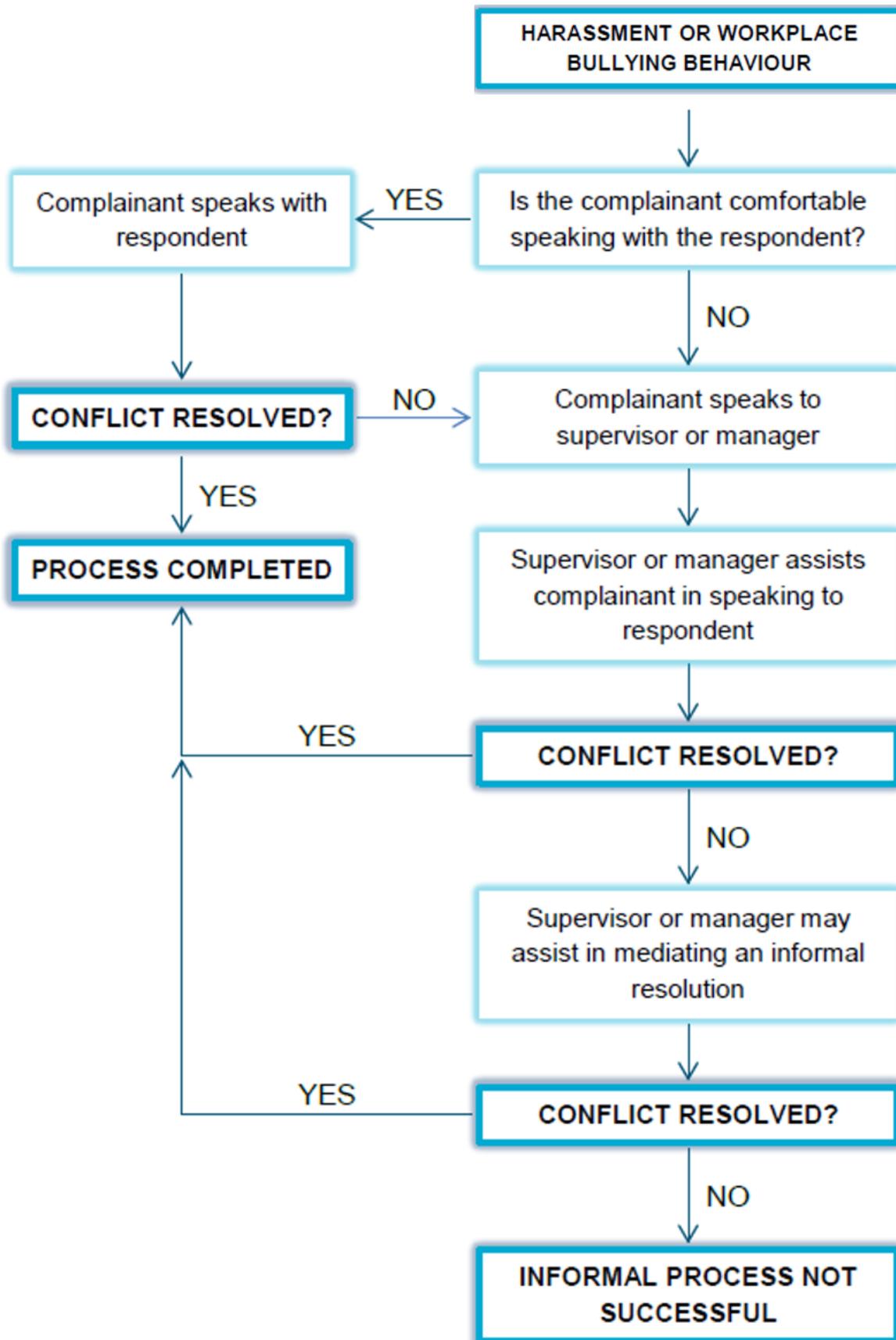
Appendices

Appendix 1: Informal Issue Resolution Process

Appendix 2: Formal Issue Resolution Process

Appendix 3: Continuum of Behaviours

Informal Issue Resolution Process



Formal Issue Resolution Process

HARASSMENT OR WORKPLACE BULLYING BEHAVIOUR

1. Has the complainant explored the options outlined within the informal resolution process? If not, complainant explores the informal resolution process.
2. If yes, complainant should refer the matter to their manager, COO, or Partner at Ing & McKee Insurance Ltd.
3. Ing & McKee Insurance Ltd. then decide whether or not to investigate. In either scenario, both the complainant and the respondent are notified
4. If no investigation warranted, the rationale will be explained with the complainant and the process is completed.
5. If the decision to investigate is “yes”, an appropriate investigation (potentially involving inside and/or outside individuals) is undertaken.
6. Management will ensure complainant is advised of findings.
7. Management will develop next steps, and implement an appropriate plan of action.
8. The process is then completed.

Toward a respectful workplace

Where are you on the continuum of behaviours?

