

Respectful Workplace Policy

Audience: MEG Energy Employees

Effective Date: 10/01/2010

Revision Date: 11/01/2018

Purpose

MEG Energy Corp. (“MEG”) is committed to a respectful workplace. At MEG we do not tolerate harassment, violence or unlawful discrimination against any individual. We believe that all individuals should be treated with dignity and respect and so are committed to fostering a respectful workplace. MEG also understands that it is ultimately responsible for worker health and safety.

The purpose of this policy is to:

- Ensure a common understanding by all employees, contingent workers and vendors of MEG of what constitutes appropriate workplace behaviour and actions; and
- Set out MEG’s commitment to eliminate or control harassment and violence in the workplace and to investigate all reported incidents of harassment and violence in the workplace.

Eligibility

This policy applies to:

- Permanent, temporary, co-op student and summer student employees of MEG;
- Contingent workers; and
- Vendors;

each a “Worker”. This policy applies to Workers at all workplaces.

Supporting Documents

- Business Conduct Charter
- <http://www.albertahumanrights.ab.ca/>
- Respectful Workplace Complaint and Investigative Guideline
- Occupational Health and Safety Act (SA 2017, c O-2.1)
- Occupational Health and Safety Code (AR 87/2009)

Definitions

- See Appendix

Policy Terms

Background

This policy supports MEG's Business Conduct Charter, which states:

"...we are committed to a workplace that is free of harassment and discrimination and we believe that all employees should be treated with dignity and respect."

Respectful Workplace

A respectful workplace is one which is free from discrimination, harassment and violence, where all individuals feel safe, respected and treated fairly. It is impossible to itemize every attribute of a respectful workplace, but some examples are listed below. A respectful workplace is one where:

- All workers are polite, courteous and respectful of others;
- Everyone is treated equally and fairly;
- People feel listened to and that their opinions, thoughts and input are valued;
- Ideas are received with an open mind and are judged on their merit;
- Diversity amongst workers is embraced as a strength; and
- People are aware of how their actions and behaviours, whether verbal, written or physical, impact others in the company, and consistently act with respect and consideration towards others.

Supervisors and managers have a responsibility to ensure the Workers under their supervision are not subject to harassment or violence in the workplace.

All Workers have a responsibility to conduct themselves in a manner consistent with the promotion of a respectful workplace. Workers must refrain from causing or participating in harassment or violence.

For purposes of this policy, the term workplace will be interpreted broadly to mean any location where a Worker is, or is likely to be, engaged in an occupation. This includes, but is not limited to:

- All areas of a Site and Camp;
- Any vehicle or mobile equipment, used by a Worker in an occupation;
- Any location where a Worker has travelled for MEG business;
- Any other location where a Worker is representing MEG.

Behaviours and Actions Not Tolerated at MEG

Discrimination

Discrimination includes behaviours or practices that result in adverse or differential treatment of an individual or group based on characteristics such as age, ancestry, colour, family status, marital status, mental or physical disability, place of origin, race, religious beliefs, sexual orientation, source of income, gender, gender identity, or gender expression. These are the specific grounds currently protected from discrimination (the "Protected Grounds") under Alberta's Human Rights Act. Discriminatory behaviour will not be tolerated at MEG.

Examples of discrimination include, but are not limited to:

- Denial of equitable treatment in hiring or in the terms, conditions, or benefits of employment;
- Failing to take reasonable steps to accommodate an individual's needs based on the Protected Grounds as required under Alberta's Human Rights Act;

Harassment

Harassment is objectionable or unwelcome conduct, comment, bullying or action that the person knows or ought reasonably to know will offend or humiliate another individual, or adversely affects another individual's health and safety. This can include both single incidents or a series of incidents, which can be either discriminatory or non-discriminatory in nature and are intended to intimidate, offend, degrade or humiliate a particular person or group. Harassment includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation and a sexual solicitation or advance. Conduct, comments, bullying or actions do not need to be intentional to constitute harassment, and do not need to be directed at a specific individual or group. Harassment will not be tolerated at MEG.

Examples of harassment include, but are not limited to:

- Unwelcome conduct, comments, gestures, visual displays or contact which causes offence or humiliation (such as name calling, harassing phone calls, spreading rumours);
- Deliberate misgendering
- Repeated conduct that has been considered harassment or discrimination in the past;
- Unwelcome sexual advances, physical contact or gestures of a sexual nature;
- Displaying or circulating of pornographic or offensive material in print or electronic form (such as pictures, cartoons or sayings);
- Physical or psychological bullying that ridicules the individual or creates fear or mistrust (such as fist shaking or yelling);
- Behaviour or actions that are intimidating or hostile (such as standing too close or making inappropriate gestures or comments);
- Cyberbullying (such as posting or sending offensive or intimidating messages through email or social media)
- Following or stalking an individual;
- Behaviour that undermines the employment relationship (such as setting the individual up to fail by making unreasonable demands, setting impossible deadlines, interfering with work or taking away work or responsibility without cause);
- Intentionally withholding information or giving the wrong information;

Violence

Violence is threatened, attempted or actual conduct of a person that causes, or could cause, physical or psychological harm to another person, or to property. Workplace violence includes violence that occurs at a workplace or that is work-related and includes both domestic and sexual violence. Violence will not be tolerated at MEG.

Examples of violence include, but are not limited to:

- Acts of physical aggression or attack (such as hitting, shoving, pushing or kicking an individual, throwing an object at an individual, kicking an object an individual is standing on, such as a ladder);
- Threatening behavior (such as shaking a fist in an individual's face, wielding a weapon, trying to run an individual down using a vehicle or equipment, destroying property or throwing objects);
- Threats to an individual, an individual's property or MEG's property;
- Verbal or written threats (such as verbally threatening to attack a worker, leaving threatening notes or emails that express an intent to inflict harm on a worker);
- Domestic violence that occurs at the workplace;
- Any sexual act, attempt to obtain a sexual act, or other act directed against a worker's sexuality using coercion.

Behaviours and Actions that do not Constitute Violations of the Policy

It is the duty of a manager or supervisor to supervise Workers, monitor their work and assess their performance. Reasonable conduct of a manager or supervisor in respect of the management and direction of Workers or the workplace as listed below do not constitute violations of this policy.

- Reasonable actions to supervise or direct workers;
- Legitimate performance management;
- Taking disciplinary action such as probation, performance improvement plans, dismissing, suspending, demoting or reprimanding with just cause and other forms of recognized discipline;
- Changing work assignments, scheduling, inspecting workplaces, and implementing health and safety measures;
- A disagreement on professional issues;
- Differences of opinion, minor disagreements and other forms of conflict – provided it is civil.

Dealing With Harassment, Discrimination or Violence

All Workers have a responsibility to be role models for MEG's corporate behaviour standards as outlined in this policy. Individuals who believe they have been treated, or have witnessed another individual being treated in a manner which violates this policy should:

- Consider telling the offending party that they object to that conduct and tell the offending party to stop. In many situations, this will solve the problem.

If the individual is either uncomfortable confronting the offending party, or has confronted the offending party to no avail, they should:

- Speak to their immediate supervisor or if the individual is more comfortable discussing the issue with someone other than their immediate supervisor, or if the individual is not satisfied with the

course of action their supervisor has taken, the individual should contact a HR Representative, a Joint Health and Safety Committee representative, or MEG'S Legal Department.

- An individual who feels threatened by violence or is experiencing a violent incident should leave the area immediately and if necessary, call for assistance from a co-worker, building security or 911.
- Following any threatened, attempted or actual violent incident a report should be made immediately to a supervisor, a HR Representative, a Joint Health and Safety Committee representative or MEG's Legal Department.
- At any stage, an individual has the option to contact MEG's Confidence Line at 1-800-661-9675 or www.meg-energy.confidenceline.net to report violations of our Respectful Workplace Policy or Business Conduct Charter.
- An individual making a report of harassment, discrimination or violence will be asked to cooperate with any investigation surrounding the incident.
- For more information refer to the Respectful Workplace Complaint and Investigative Guideline.

MEG Management Response to Violation Reports

MEG management, along with MEG's Health and Safety department, has a responsibility to develop workplace arrangements to eliminate or control harassment, discrimination and violence. All complaints will be dealt with promptly and in a professional and discreet manner. MEG will not disclose the circumstances related to an incident of harassment, discrimination or violence or the names of the parties involved (including the complainant, the person alleged to have committed the harassment or violence and any witnesses) except where necessary:

- To investigate the incident or take corrective action
- To inform the parties involved in the incident of the results of the investigation and that corrective action was taken,
- To inform workers of a specific or general threat of violence or potential violence, or
- As required by law.

Where disclosure is required, MEG will disclose the minimum amount of personal information necessary. No reprisals or retaliation will be tolerated against any individual who, in good faith, reports or participates in the investigation of any alleged violation of this policy. This policy is not intended to discourage a Worker from exercising rights pursuant to any other law, including the *Alberta Human Rights Act*

In the event of a report of an incidence of violence and, as appropriate harassment or discrimination, MEG management, and where applicable MEG Health and Safety, will take immediate action following such report to reduce the risk of further incident or injury, ensure that First Aid is provided or medical resources are called and activate appropriate crisis management procedures to assist the victim where necessary. Furthermore, MEG will ensure that a Worker reporting an injury or adverse symptom resulting from an incident of harassment or violence is advised to consult a healthcare professional as well as a MEG Employee Assistance Provider.

Finally, MEG management will conduct periodic reviews of reports of violations of this policy and make recommendations as appropriate to prevent the occurrence of further incidents.

Consequences of Violations

Violations of this policy may be unlawful and will be considered violations of the Business Conduct Charter. The consequences of each situation will be determined based on its specific facts. Violations of this policy may result in legal consequences as well as discipline up to and including dismissal of an employee for cause or termination of a contractual relationship with MEG, as the case may be.

Exceptions to This Policy

None.

For More Information

If you have any questions about this policy or would like more information please send an email with your request to the [HR Inbox](#).

Disclaimer: Changes to Policy and Impact of Conflict With Employment Standards

Subject always to its obligations to comply with applicable law, MEG reserves the right to review, amend or withdraw this policy at any given time. In the event that there is a conflict between this policy and the *Alberta Employment Standards Code*, the *Alberta Employment Standards Code* shall govern.

Appendix

Definitions

3CON describes a worker engaged to perform work for MEG through an employment agency. In most cases a MEG representative supervises their work.

3PSP (Third Party Service Provider) describes a worker who is employed by a company other than MEG. In most cases a representative from the workers employing company supervises their work.

Camp is considered to be the living quarters of all employees and contractors while at Site. This includes all recreational space and eating areas.

Co-op student describes a student hired as an employee for a specific period of time and gaining work experience as part of a structured educational program.

Contingent worker describes a person who is engaged to perform work for MEG as a 3PSP, PSA and 3CON.

HR Representative includes members of the Human Resources department such as HR Business Partners and Benefits Specialists.

Manager describes a specific management level within MEG, that has specific approval authority.

Permanent employee describes a person hired for an indefinite period of time.

Protected Grounds are definitions of individuals protected from discrimination in specific protected areas, including employment practices, under the Alberta Human Rights Act. The protected grounds are:

- Race
- Religious beliefs
- Colour
- Gender
- Gender identity
- Gender expression
- Physical disability
- Mental disability
- Ancestry
- Age
- Place of origin
- Marital status
- Source of income
- Family status
- Sexual orientation

PSA describes a worker engaged to perform work for MEG using a Personal Services Agreement. In most cases a MEG representative supervises their work.

Site describes all MEG owned or leased operational and project work locations.

Summer student describes a student hired as an employee for a specific period of time (i.e. during the summer months).

Supervisor describes the person who directly monitors and regulates the performance of the employee.

Temporary employee describes a person hired for a specific period of time (e.g. six months).

Worker describes all Permanent employees, Temporary employees, Co-op students, Summer students and vendors of MEG.