

Respectful Workplace Policy

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, contract workers and Service Providers 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;
- Contract workers; and
- Service Providers;

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

Supporting Documents

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

Definitions

See Appendix section of the playbook

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Policy Terms

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 any worksite and/or Camp;
- Any vehicle or mobile equipment, used by a Worker in an occupation;
- Any location where a Worker has travelled for MEG business; and
- 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 is not 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; and
- Failing to take reasonable steps to accommodate an individual’s needs based on any Protected Ground as required under Alberta’s Human Rights Act;

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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 is not 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); and
- 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 is not 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);

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- 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 or spills over into the workplace. Being a pattern of behaviour used by one person to gain power or control over another with whom they have, or have had, a personal relationship; and
- any sexual act, attempt to obtain a sexual act, or other act directed against a worker’s sexuality using coercion. It includes on-line forms of violence and harassment and sexual exploitation, and other actions across a wide range of inappropriate behaviour.

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; and
- differences of opinion, minor disagreements, and other forms of conflict – provided it is civil.

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.

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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.

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Appendix A: Respectful Workplace Procedures

Procedures

Safety First

An individual who feels threatened 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.

Reporting Discrimination, Harassment or Violence

Any Worker, who has heard, witnessed or experienced any form of, discrimination, harassment or violence is **required** to report such behaviour to any one of the following representatives:

- immediate manager or supervisor;
- a Joint Health and Safety Committee representative;
- a HR Representative;
- a member of MEG's Legal Department; or
- MEG's Confidence Line at 1-800-661-9675 or www.meg-energy.confidenceline.net.

Under no circumstances will an individual reporting discrimination, harassment or violence be expected to make a report to the individual accused of the discrimination, harassment, or violence (e.g. where the alleged offender is the complainant's manager or supervisor).

All reports of discrimination, harassment or violence will be investigated using the investigation process outlined below. As part of the initial report, the following information may be collected:

- the details of the incident;
- the name(s) of the Worker and others involved in or witnesses to the incident;
- the date of the incident; and
- any documents relevant to the incident.

MEG will not tolerate any act of retaliation against an individual for making a good faith report of discrimination, harassment, or violence, regardless of whether it is determined to be substantiated. If a Worker hears, witnesses or experiences any behaviour which may be considered retaliation, they should report it immediately to those representatives listed above.

Anonymous Complaints

MEG accepts anonymous complaints, and an investigation will always be undertaken where there is evidence of wrongdoing. However, MEG's ability to investigate, substantiate and respond to anonymous complaints may be limited if sufficient information has not been provided in the complaint or individuals making the complaint are unwilling to substantiate it. The more evidence that is provided, the better MEG

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is able to respond promptly and professionally. Individuals advancing complaints are therefore encouraged to provide their contact information.

Investigation Process

1. All reports of discrimination, harassment or violence will be investigated. Investigations are completed by Human Resources with support from MEG Health and Safety, and MEG Legal where required. Once a report of discrimination, harassment or violence is received, an impartial investigator will be appointed.
2. Interviews will be conducted, and statements taken within 20 working days of receipt of the complaint. All reasonable attempts will be made to conduct interviews “in person”. Depending on the circumstances of the complaint, the following individuals may be interviewed:
 - the Worker making the complaint;
 - the individual who is the subject of the complaint;
 - other individuals directly involved in the complaint; and
 - witnesses to the incident or behaviour leading to the complaint.
3. The individual who is the subject of the complaint will be informed of the allegations made against them and will be provided with an opportunity to respond.
4. Detailed notes will be kept of all interviews and discussions related to the investigation. All such notes, along with copies of any correspondence sent to individuals involved will be kept on file in the custody of Human Resources. Relevant information will be requested of and provided to only those persons essential to the timely resolution of the investigation or complaint.
5. The information gathered, as well as the results of the investigation will be summarized in a report.
6. The Worker making the complaint and the individual who is the subject of the complaint will be informed of the results of the investigation and corrective action taken whenever possible, while maintaining the privacy of those involved. This may mean the Worker making the complaint is not informed of the specific nature of corrective action taken.
7. A complaint may be dismissed for a variety of reasons, including, but not limited to:
 - the Worker who made the complaint does not provide sufficient detail to allow an investigation to be completed;
 - the facts alleged in the complaint, even if taken as true, do not constitute a violation of this policy;
 - the Worker who made the complaint declines to cooperate in the investigation; or
 - an appropriate resolution has already been achieved or has been offered and rejected.
8. MEG will carefully consider the most effective and appropriate consequences before arriving at a resolution in each specific incident. Appropriate remedies may include, but are not limited to:
 - requirement to re-assert commitment to and understanding of Business Conduct Charter and Respectful Workplace Policy;

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- requirement to access behavioural assistance resources as directed by MEG;
- mediation between parties involved;
- immediate removal from MEG workplace, and/or suspension of work, either paid or unpaid;
- temporary or permanent suspension of Site and/or Camp privileges; or
- progressive discipline up to and including termination.

Please note, some of the above remedies may be implemented upon the complaint arising (for example suspension with or without pay) while the investigation is undertaken.

9. If MEG determines that the complaint was made in bad faith, the complainant may be subject to progressive disciplinary action under the same considerations as above, including up to termination of their employment, or contractual relationship with MEG on a for cause basis.
10. Incidents of harassment and violence may be reported to Alberta Labour as required under Occupational Health and Safety Standards (e.g. if a Worker is admitted to hospital as a result of the incident).

Confidentiality

MEG will endeavor to maintain confidentiality to the greatest extent possible. MEG will not disclose the circumstances related to the incident or the names of the parties involved (including the Worker making the complaint, the person alleged to have breached the Respectful Workplace Policy and any witnesses) except where necessary to investigate the incident, take corrective action, inform the parties involved in the incident of the results of the investigation, inform Workers of a specific or general threat of violence, or as required by law. Due to privacy concerns, Workers may not be provided specific information on the results of an investigation or corrective action taken.

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