

Respectful Workplace Policy - Resolution Procedure

This document is to be read alongside ARC's *Respectful Workplace Policy* and *Respectful Workplace Policy* – *Definitions* documents.

Informal Resolution

At ARC, we believe resolving issues when and where they occur may be an effective way to immediately address and resolve instances of Disrespectful Workplace Behaviour. However, we acknowledge that it can be difficult to have a conversation with someone about their behaviours and actions towards you, and depending on the severity of the situation or your comfort level, this course of action may not be appropriate. In this case, we encourage you to seek out support from your leader, another senior leader or ARC officer, or Human Resources. They will be able to assess the situation and discuss different options with you to address the Disrespectful Workplace Behaviour.

Formal Complaint

If you are not comfortable pursuing an informal resolution, or feel that the matter was not properly addressed by an informal process, you may proceed to file a formal complaint of Disrespectful Workplace Behaviour to your leader. If you do not feel comfortable reporting the information to your leader, you can report or submit your complaint to another senior leader, ARC officer, Human Resources, or anonymously using the Whistleblower Hotline (see below).

Formal complaints can be reported directly in person, via phone, regular mail, or email. In order to adequately investigate any claims brought forth, we ask that you provide as much detail as possible regarding the alleged violation or complaint, including names, dates, places, events that occurred, your explanation of why such incident(s) may constitute a violation of this policy, and information that will enable us to contact you to follow up on your complaint to determine the course of action required.

Anonymous Complaint

In the event you do not feel comfortable informing your leader, another senior leader, ARC officer or Human Resources, or if you are not satisfied with the response received after reporting your concerns, we have set up a confidential Whistleblower hotline with an independent third party that you can access. Complaints and concerns can be submitted by clicking on this link to get to the *Whistleblower Hotline Policy* on ARC's external website. You will be directed to a secure website where you can complete a secure on-line form or you can access the secure hotline and leave a message by calling the toll-free telephone number at 1-866-291-6690. All submissions are reviewed by the Chair of the Audit Committee or the Chair of the Policy & Board Governance Committee.

Investigation Process

ARC is committed to investigating all reported violations or complaints in a prompt, objective, and sensitive manner, taking necessary corrective action and providing appropriate support for those affected. Once a complaint is submitted, Human Resources will undertake an initial fact-finding investigation to determine if a formal investigation is required. If it is determined by Human Resources that a formal investigation is required, either an internal or external investigation will commence. Such an investigation will be conducted and recorded in a timely manner and will be in accordance with the incident reporting and investigations requirements of all applicable legislation.

Upon conclusion of an investigation, an investigation report will be prepared, outlining the circumstances of the incident and the corrective actions that are recommended. Based on these recommendations, corrective action may be taken by Human Resources and/or other ARC business units to address the specific incident and/or any wider hazard that may exist.



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For privacy reasons and other confidentiality concerns, the complainant and respondent will not be provided with a full copy of the investigation report. Instead, they will receive a high-level summary notification that confirms that the investigation has been completed, and notified of any corrective action to be taken in response to the specific incident and/or larger hazard. No investigation information will be kept on a workforce member's file, with the exception of disciplinary documentation as a result of the investigation, where applicable.

Confidentiality and Related Protections

ARC is committed to ensuring the confidentiality of those who report Disrespectful Workplace Behaviour is respected and maintained to the extent possible and allowable by applicable law, consistent with the need to conduct an adequate investigation.

ARC prohibits, and takes action, when reprisals and retaliations are made against any individual who, in good faith:

- Has submitted a complaint;
- Identified or opposed a practice that they reasonably believe constitutes Disrespectful Workplace Behaviour:
- Participated in an investigation under this policy or any applicable complaint process;
- Sought information or exercised a right under applicable law or statute with respect to Disrespectful Workplace Behaviour.

Any person demonstrating such retaliation will be subject to discipline, up to and including termination.

When a complaint involving Disrespectful Workplace Behaviour cannot be substantiated, no action will be taken against a workforce member who has made a complaint in good faith.

Where a complaint is proven to be fraudulent or malicious (as distinct from unfounded or unsubstantiated), the workforce member who made the unsubstantiated complaint may be subject to disciplinary action, up to and including termination.

Summary

ARC takes having a respectful workplace seriously and strives to foster a respectful and welcoming workplace culture for all employees. We are committed to reviewing this procedure regularly to ensure it continues to serve its intended purpose, and to facilitating ongoing company-wide education and training to ensure it is understood and embraced throughout the organization. If you have any questions, concerns, or suggestions regarding this procedure document, please contact any member of the Human Resources team.