

WORKPLACE HARASSMENT AND DISCRIMINATION PREVENTION POLICY

Everyone has a right to work in an environment that is free from workplace harassment and discrimination as described in the definition section of this policy.

SCOPE & APPLICATION

This Policy applies to everyone who works or contracts with IG Wealth Management, Mackenzie Investments or Investment Planning Counsel and their subsidiaries (collectively IGM). This includes employees (permanent and fixed term), consultants, associates, directors, advisors, contractors, and people whom consultants and advisors employ to provide services to IGM. It covers conduct anywhere our business is being conducted or sponsored, whether on or off our property.

A breach of this policy will result in disciplinary action, up to and including termination of employment or contract.

RESPONSIBILITIES

Leaders, including Consultants who employ others in any business conducted on behalf of IGM:

- Take all reasonable measures to prevent and protect people from harassment or discrimination
- Take all concerns of harassment or discrimination seriously
- Immediately contact the HR Business Partner who supports the business channel, who will then escalate the situation to the Employment Practices group.
- Provide the appropriate resources to someone facing a harassment or discrimination situation

Everyone:

- Read, understand and abide by this Policy
- Immediately report any incident of harassment or discrimination through the appropriate channel (see Complaint Procedure outlined below)
- Cooperate in the investigation of any reported incident.

Employment Practices

- Communicate the policy
- Provide appropriate training on the obligations under this policy
- Ensure a timely, impartial and objective investigation takes place
- Keep the immediate parties informed of the status of the investigation and ultimate findings
- Track investigations to assess any trends requiring additional education or communication
- Review this Policy at least annually or as required by law.

COMPLAINT PROCEDURE

Anyone who experiences or observes discrimination or harassment should advise the other party that they object to the behaviour, if comfortable doing so. Keep a written record of the behaviour, the date, the names of the parties and any witnesses, and copies of any relevant documents such as texts or emails.

Use any one of the following reporting channels to escalate the concern:

- advise a leader, a Human Resources Business Partner, or a member of the Legal Department of the incident, and they will escalate the concern to the Employment Practices group for appropriate review, investigation and resolution
- contact the IGM ethics line at: www.igmfincial.ethicspoint.com
- email the Whistleblower Reporting Mailbox
- telephone the Whistleblower Reporting hotline at
 - For Canada and US: 1-844-231-3603
 - For Ireland: 1-800-550-000
 - For Hong Kong: 800-961763

This Policy is not intended to discourage or prevent someone from filing a complaint or requesting information or assistance under any applicable laws, including provincial human rights, health and safety, whistleblower legislation, the Criminal Code of Canada, or any complaint process provided by a professional regulatory body applicable to the alleged offender.

IGM reserves the right to report the issue to law enforcement or an applicable regulatory body if such action is warranted, based on the findings of any investigation and/or the nature of the behaviour.

INVESTIGATION AND RESOLUTION PROCESS

The purpose of the investigation is to establish a full understanding of what happened and to determine an appropriate response to ensure the behaviour stops and is not repeated.

The names and details of the investigation will be kept as confidential as possible, and only disclosed as required to ensure a fair and thorough investigation or as required by law. The investigation may require disclosure to and involvement of other IGM departments such as Compliance or Legal, or the parties' management team.

Anyone who participates in an investigation will be held to the strictest confidence and provided only with information deemed necessary.

- Employment Practices will review the complaint to determine if it meets the definition of discrimination or harassment, or whether it is an issue better handled by other parties (for example Compliance, Legal or management).
- If the matter meets the definition of discrimination or harassment, an internal or external investigator will be assigned, depending on the nature of the incident, the parties involved, the expected extent of the investigation, and other relevant factors. The investigator will review any necessary documentation and interview all relevant and necessary parties in an appropriate order, as quickly and confidentially as possible.
- Corrective action will be based on the severity of the incident, the respondent's explanation, past actions taken in comparable circumstances, and whether this is a first or subsequent occurrence.
- The complainant and the respondent will be advised in writing of the outcome of the investigation and any corrective action that is taken. The parties will not be provided with a copy of any final report.
- If applicable, the applicable Health and Safety Committee will be asked to develop any additional workplace procedures that may be required.

Interference with the course of an investigation or retaliation against a complainant or witness is prohibited under this policy and will result in disciplinary action up to and including termination of employment or contract.

Anyone who deliberately and maliciously files a false complaint will be subject to discipline up to and including termination of employment or contract.

DEFINITIONS

Workplace: anywhere our business is being conducted or sponsored, whether on or off our premises. This includes, but is not limited to, offsite locations such as training programs, conferences, social events, and client locations.

Discrimination: differential treatment in employment or contracting based on any of the protected grounds outlined in human rights legislation across Canada. Protected grounds include age, marital or family status, pregnancy, disability, sex, sexual orientation, gender identity or expression, race, colour, ancestry, ethnic or national origin, citizenship, religion or creed, or any other ground identified by provincial human rights legislation as amended from time to time. Discrimination does not have to be intentional or directed at a specific person or group. It can result from practices and policies that may seem neutral but have the effect of treating a member or members who fall under a protected ground differently.

Harassment: A repeated course of unwelcome comment or conduct that creates or can reasonably be known to create an intimidating, threatening, hostile or offensive work environment, or unreasonably interferes with someone's performance, employment, or contractual opportunities. It is a type of discrimination and can take many forms, including written, verbal, physical, visual, or electronic. It includes threats or promises regarding job security, opportunities or treatment, based on accepting or rejecting harassing behaviour. A single such event can also be considered harassment where it creates a poisoned work environment.

Some common types of harassment are:

- 1) **Sexual Harassment:** Unwelcome comments or conduct based on sex, gender identity or expression, or sexual orientation. It also includes a sexual advance. It can occur between individuals of the same or different sex, sexual orientation or gender expression. Some examples are:
 - Sexist, homophobic or sexually-oriented jokes or comments
 - Derogatory, insulting or degrading remarks
 - Sexually suggestive gestures or innuendoes
 - Sexually explicit or demeaning images or communication
 - Unwelcome physical contact such as touching, pinching, rubbing or patting
 - Questions or comments about someone's physical appearance, sex life or personal relationships
 - Unwelcome flirtation, advances or propositions
 - Invitation for dates or sexual favours by someone in a position of power i.e. one who can grant or deny a promotion

- Threats or promises regarding job security or contracting opportunities, or any other treatment based on accepting or rejecting behaviours listed above

2) Workplace Harassment: Behaviour targeted at someone that could be reasonably perceived as unwelcome or bullying, and that adversely affects their psychological or physical well-being. The comments or conduct can be unrelated to a prohibited ground, and can include a single comment or conduct, if serious enough. Some examples are:

- Insults
- Offensive names or nicknames
- Shouting at someone or slamming items down on desks
- Vandalizing personal belongings
- Sabotaging work
- Spreading malicious rumours
- Aggressive or threatening gestures or comments
- Constant and unwarranted nitpicking or criticism over trivial matters or mistakes
- Harassing emails or texts, or posting humiliating or intimidating information on social media or websites

3) Psychological Harassment – verbal comments, actions and gestures that are hostile or unwanted, directed towards a specific person or group, which serve no legitimate work-related purpose and have the effect of unreasonably interfering with a person’s work performance or creating an intimidating, humiliating, hostile or offensive environment. Some examples are:

- Repeated verbal abuse and/or patronizing comments
- Repeated incidents of yelling or name-calling; or
- Threats to terminate employment or contracts unrelated to performance.

4) Poisoned work environment: created by comments or conduct directed at a particular group. While the comment or conduct is not directed at someone specifically, a person who is a member of the targeted group may still experience a poisoned work environment. It can also develop when a person or group is excluded in the Workplace in such a way that they feel disadvantaged or undervalued.

Harassment or bullying **does not include:**

- Decisions to change job accountabilities, work assignments or reporting structures
- Enforcement of regulatory or contractual obligations
- A change in working conditions, such as hours or location
- Job assessments and performance evaluations
- Performance reviews and discussions
- Minor disagreements or differences in opinion between co-workers
- Legitimate disciplinary action or termination of employment or contractual relationship