

BORALEX
Beyond
RENEWABLE ENERGY



Canadian Workplace Bullying, Harassment and Violence Policy

Last Update: 2025-07-14



1. Policy statement

The management of Boralex Inc. ("**Boralex**") is firmly committed to ensuring everyone enjoys a respectful and safe workplace. To that end, Boralex will not tolerate any form of workplace harassment, bullying or violence.

Boralex is committed to taking all reasonable steps to ensure employees are treated with respect, to promote their physical and psychological well-being. Boralex is committed to eliminating or, if that is not reasonably practicable, controlling rigorously the hazards of bullying, harassment and violence.

2. Objectives

To ensure that employees have a work environment that is free of bullying, harassment or violence and to encourage respect and dignity in all working relationships.

This Policy defines Boralex's expectations and the measures and procedures in place to prevent, respond to and investigate workplace harassment, bullying and violence, including the available assistance mechanisms and the internal complaint resolution procedure.

3. Scope

This Policy applies to all Boralex employees in Canada, regardless of the nature of the relationship between the alleged perpetrator and the victim, whether during or outside normal working hours, whether at work or during any other activity, including social activities related to work. This Policy also applies to interactions between employees and third parties, such as subcontractors, contractors, consultants, clients, etc.

In addition, this Policy applies to interpersonal and electronic communications, such as e-mail or instant messaging.

4. Legal framework

This Policy is intended to comply with applicable laws.

5. Definitions of bullying and harassment, its characteristics and its manifestations

Workplace harassment¹ means engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome. It can involve words or actions on either a one time or continuous basis that are known or should be known to be offensive, embarrassing, humiliating, demeaning or unwelcome. Workplace harassment can manifest itself through jokes, comments, threats or other offensive and inappropriate behavior, amongst other things.

For the purposes of this Policy, workplace harassment includes bullying, workplace sexual harassment, psychological harassment and discriminatory harassment.

¹ For the purpose of this Policy, "workplace harassment" refers to this definition or the definition of "psychological harassment" if Quebec is the jurisdiction of the employee.

Psychological harassment² means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects, or is intended to affect, the dignity or psychological or physical integrity of an employee, manager, officer, director, intern or volunteer and that results in a harmful work environment for that person. For greater certainty, psychological harassment includes such behaviour in the form of such verbal comments, actions or gestures of a sexual nature. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment. For the purposes of this Policy, psychological harassment includes bullying, workplace sexual harassment and discriminatory harassment.

Discriminatory harassment is harassment based on any of the grounds listed in the applicable human rights legislation which may include: indigenous identity, race, colour, ancestry, place of origin, political belief, religion, sex, gender identity or expression, pregnancy, sexual orientation, civil (marital) status, family status, source of income, criminal conviction, and age except as provided by law, religion, creed, political convictions, affiliation or activities, language, ethnic or national or aboriginal origin, social condition, a handicap (physical or mental disability) or the use of any means to palliate a handicap.

Workplace sexual harassment means:

- (a) engaging in a course of vexatious comment or conduct against a worker, in a workplace, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- (b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or promotion to the employee and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Bullying is a serious form of harassment. It may involve any action(s), comment(s), physical contact(s), or behaviour that is found to be objectionable. Bullying includes but is not limited to:

- Using abusive language;
- Physical intimidation (including but not limited to fists pounding on desks, throwing of objects, threats of physical violence);
- Continually ignoring or excluding certain workers;
- Deliberately undermining a competent worker by overload and/or constant criticism;
- Singling out one person, when there is a common problem;
- Shouting at, or humiliating a worker in front of others or in private; and/or
- Sending offensive email(s), online messaging, or messages by other means, including aggressive use of capitals, fonts and colour; internally or on social media.

The normal exercise of Boralex's management rights, notably, the right to assign duties or impose disciplinary measures as well as any organizational changes, disagreements, or negative performance evaluations, are not considered to be workplace harassment for the purposes of this Policy, in as much as the employer does not exercise these rights in an abusive manner.

² This definition applies to Quebec and includes the definition of sexual harassment.

6. Definitions of Workplace Violence

Workplace violence means (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker, (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker, (c) a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Workplace violence includes, but is not limited, to the following:

- All threatening behavior such as violent or aggressive gestures, property damage, vandalism, sabotage, throwing objects;
- Any form of expression of intent to inflict harm such as oral or written threats;
- Any verbal excesses such as swearing, insults or condescending language;
- Any physical assault such as hitting with the hand or foot, pushing, shoving; and
- Psychological and physical violence.

Workplace violence includes sexual violence as well as domestic (spousal) or family violence, where there is a nexus between the violence and the workplace. It also includes 'improper behaviour or activity' as defined in this Policy.

Improper behaviour or activity means (a) the attempted or actual exercise by a worker towards another worker of any physical force so as to cause injury, and includes any threatening statement or behaviour which gives the worker reasonable cause to believe the worker is at risk of injury.³

Sexual violence means any form of violence targeting sexuality or any other misconduct, including unwanted gestures, practices, comments, behaviours or attitudes with sexual connotations, whether they occur once or repeatedly, including violence relating to sexual and gender diversity.

Domestic (spousal) and family violence includes any form of violence brought into the workplace arising out of an act of violence committed against an individual by that individual's spouse or family member.

Domestic (spousal) and family violence can manifest itself in a variety of ways, including:

- Harassment by telephone, email or text;
- Frequent intrusions by the abuser into the victim's workplace;
- Communication of the abuser to co-workers or employer, etc.;
- Following and/or harassing the victim at or near their workplace.

7. Undertakings and responsibilities

It is the responsibility of Boralex:

- To take reasonable preventative measures to protect employees and others in the workplace from workplace violence and workplace harassment;
- In cases of domestic (spousal) or family violence, to take reasonable steps to ensure the protection of the employee, when Boralex, as an employer, knows or ought reasonably to know that an employee is exposed to such violence;
- To ensure that a workplace violence risk assessment is conducted as required by law;

³ This definition applies in British Columbia.

- To develop measures and procedures to address workplace violence risks identified in the workplace violence risk assessment;
- To ensure that all employees are trained in this Policy and in the measures and procedures established to protect them from violence and harassment;
- To ensure the process for reporting, responding to and investigating incidents of workplace harassment and violence is communicated, maintained and followed as set out in this Policy and as required by law;

In addition, Boralex implements measures aimed at identifying, controlling and eliminating the risks of workplace harassment and violence, including psychological harassment and conduct of a sexual nature by:

- Posting this Policy in a conspicuous place in the workplace and/or otherwise ensuring that the Policy is available to employees and third-parties visiting the workplace;
- Reviewing this Policy at least annually, and making any necessary adjustments;
- Promoting respect and informing employees of the various forms of workplace violence and harassment, including conduct manifested through words, acts or gestures of a sexual nature;
- Informing employees of their roles and responsibilities in preventing workplace violence and harassment;
- Carrying out continuous monitoring of the risks and risk factors likely to cause bullying, violence or harassment situations in the workplace;
- Having a process for reporting and investigating incidents of workplace harassment, bullying and violence and taking corrective action, as necessary;
- Implementing a training to raise awareness among employees and Designated Person(s) under this Policy including:
 - *An overview of the current workplace policies, with specific modules on: a) recognizing and preventing workplace bullying, harassment and violence, b) the appropriate response to violence and harassment, including procedures for obtaining assistance, and (c) the procedures for reporting, investigating and documenting complaints and incidents of violence and harassment. This training is assigned to all new employees when they join Boralex.*
 - *For designated persons and managers, an additional module is presented to outline their roles and responsibilities, as well as the procedure for receiving and managing complaints and reports.*
 - *In addition, employees are required to take annual training on the Code of Ethics, which focuses on Boralex's values and the responsibility of employees to behave in a manner consistent with them and underscores our commitment to maintaining a safe and healthy environment.*

It is the responsibility of managers:

- To understand and abide by the requirements of this Policy;
- To communicate and review this Policy with the employees they supervise or manage;
- To ensure that employees have received training on the procedures that address workplace violence and workplace harassment risk(s) applicable to the employee;
- To encourage employees to report complaints or incidents of workplace harassment, bullying and violence;
- To respond to all complaints or incidents of workplace harassment, bullying and violence in a professional manner;

- To promptly report all complaints or incidents of workplace harassment, bullying and violence they receive or witness to a Designated Person under this Policy.
- To immediately notify employees of any threat made against them or their family and advise them to notify the police. Or, if unable to contact the employee, to notify a family member so that appropriate precautions can be taken;
- To notify any employee reporting an injury or adverse symptom as a result of an incident of workplace violence to consult a physician of the employee's choice for treatment or referral.

It is the responsibility of employees (including managers):

- To comply with this Policy at all times;
- Behave with respect and civility at all times, including at work-related social events;
- To immediately notify their manager or directly a Designated Person of any incident of workplace harassment, bullying or violence whether the notifying employee is the victim or not. If the manager is notified, the manager should immediately report the situation to a Designated Person.
- To participate in training regarding this Policy and the procedures directed at workplace harassment and violence risks in the workplace; and
- To fully cooperate in any investigation of complaints or incidents of workplace bullying, harassment and violence or breaches of this Policy.

8. Responding to imminent threats of workplace violence

Boralex has an “immediate response” procedure for any person who is or who may be at immediate risk of being subject to workplace violence. Please refer to Appendix A for the steps to follow in such a situation.

Any employee experiencing violence outside of the workplace (e.g. domestic (spousal) and family violence) that may create a risk of danger to themselves or others in the workplace is encouraged to report such incidents or behaviour so that Boralex can take reasonable preventative steps and action to support the employee and others in the workplace, as applicable.

9. Procedures for reporting an incident or complaint

In the event of an incident, threat or complaint of workplace harassment, bullying or violence, employee's are expected to notify a Designated Person (**see list of Designated Persons in Appendix B**) as soon as practically possible to seek assistance, their manager or the Ethics Alert.

- **Ethics Alert:** Online reporting: [Boralex SAS | Home](#)
Reporting by phone:
Canada : +1 (289) 401-9198
France : +33 1 87 21 22 91
United Kingdom : +44 20 38 85 00 64
United States : +1 (213) 279-1015

Upon becoming aware of an incident, concern or complaint, managers are obligated to respond appropriately or direct the concern or complaint to a Designated Person for further response.

If an employee needs further assistance, counselling or advice they may contact: [Dialogue](#): Employee and Family Assistance Program (EFAP)

Where appropriate, employees who believe they have been subject to conduct in violation of this Policy, may inform the individual that their conduct is unwelcome and request that it be

discontinued.

All incidents and complaints should be documented. The report should be as detailed as possible and at minimum, include details of the incident or complaint, the name(s) of the involved individuals, including any witnesses, and the date(s) and location of the incident.

If a report is made verbally, the reporting contact, along with the person reporting the incident or complaint (the “**complainant**”), should ensure the aforementioned information is captured in writing and brought to the attention of a Designated Person.

Although there is no fixed time limit for making a complaint, employees are strongly encouraged to do so as soon as possible so that timely and effective investigation and corrective action, if necessary, may occur.

10. Responding to complaints and incidents

All incidents, threats or complaints of workplace harassment, bullying or violence will be treated seriously and acted upon promptly.

Upon receipt of a complaint, the Designated Person will review the complaint to determine whether the allegations, assuming them to be true, would reasonably constitute workplace harassment, bullying or violence, as defined by this Policy. The analysis is also performed to determine whether there is sufficient information to investigate the complaint. Complaints that are vague or lacking sufficient detail may not be able to be fully investigated.

The Designated Person will request additional information or clarification of the allegations from the complainant, where warranted.

Complaints that appear to be made in bad faith or appear to be manifestly ill-founded, frivolous or vexatious will be acted upon in accordance with this Policy.

If applicable, the complainant will be informed of decisions regarding the inadmissibility of a complaint.

In addition to the above, the Designated Person will do the following upon receipt of a complaint, as appropriate to the circumstances:

- Assist the complainant in documenting the incident or complaint, if necessary;
- Contact the individual(s) named in the report or complaint (the “**respondent**”) in order to inform them that a complaint has been made against them and provide them with information on the nature of the allegations;
- Provide the complainant and respondent with information on the resolution / investigative process set out in this Policy;
- Provide any necessary support or counselling resources to the complainant or respondent, including contact details for available support measures (EAP, CLSC, etc.);
- If appropriate, offer the parties options for resolution of the complaint (e.g.: mediation).

At all times, the Designated Person will act in an impartial manner, with diligence and in confidentiality.

If the incident or complaint involves a senior executive, management or board members or for any other circumstances that warrant it, an external person qualified to conduct workplace investigations and with knowledge of the relevant laws, may be retained to assist with handling a complaint, namely for analyzing the admissibility of a complaint and/or to conduct an investigation (the “**external resource**”).

Temporary preventive measures

Upon receipt of a report or complaint, the Designated Person may recommend to management, the implementation of temporary (interim) preventive measures including but not limited to:

- Changing the work schedule of the complainant or the respondent;
- Transferring the complainant or the respondent to another department or work location;
- Suspending the respondent, with or without pay, depending on the circumstances; or
- Taking any other reasonable action that may be necessary in the circumstances.

11. Procedures for conducting the investigation

Boralex will conduct an investigation, appropriate in the circumstances, upon receiving or becoming aware of an incident or complaint of workplace harassment, bullying or violence. The Designated Person or the external resource, depending on the case (hereinafter the “**Investigator**”), will endeavour to complete the investigation in a timely manner and generally within 90 working days or less, unless there are extenuating circumstances (complex investigation, availability of witnesses) which may warrant or necessitate a longer investigation.

The investigation will include the following steps:

- (i) reviewing the complaint / allegations;
- (ii) interviewing the complainant, respondent, any witnesses as appropriate and any other person involved in the incident or with knowledge of the incident and taking appropriate notes;
- (iii) collecting and reviewing any relevant documents or other evidence; and
- (iv) preparing a written report summarizing the steps taken during the investigation, the details of the incident or complaint, the allegations and the evidence of the complainant, respondent and witnesses. The report will set out findings of fact and come to a conclusion about whether a Policy violation was found or not.

12. Corrective Action

Depending on the findings, Boralex may take corrective action, including administrative or disciplinary measures, as appropriate in the circumstances, which may include but not be limited to the following:

- (i) official apology to the concerned party;

- (ii) attending training session(s), namely on appropriate workplace behaviours;
- (iii) disciplinary action up to and including termination of employment for cause;
- (iv) transfer or demotion; and / or
- (v) any other disciplinary or administrative action appropriate in the circumstances.

Similarly, refusing or neglecting to comply with the corrective measures or to cooperate with the investigation may, in and of itself, constitute a violation of this Policy and give rise to disciplinary action up to and including termination of employment.

Following the investigation, Boralex will inform, in writing, the complainant and the respondent (if they are an employee of Boralex), of the results of the investigation.

Employees who have suffered an injury or adverse symptoms as a result of an incident of bullying, harassment or violence will be advised to consult a health professional of their choice or access the services of the company-provided employee and family assistance program: [Dialogue: Employee and Family Assistance Program \(EFAP\)](#).

Nothing in this Policy is intended to discourage an employee from exercising the employee's rights under any other law, including applicable human rights legislation.

13. Confidentiality and Conservation of Documentation

Boralex will not disclose the circumstances related to an incident of workplace harassment or violence, or the names of the complainant(s), the respondent(s), and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, (ii) where necessary to inform workers of a specific or general threat of violence or potential violence, or (iii) as required by law. Boralex will disclose only the minimum amount of personal information that is necessary to inform workers of a specific or general threat of violence or potential violence.

Employees who fail to observe this confidentiality obligation will be subject to disciplinary action.

Information related to an incident or complaint of workplace harassment, bullying or violence will be maintained in a file separate from the employees' personnel file, other than disciplinary action, which will be kept in the employee's file, in accordance with Boralex's record keeping procedures.

14. Record Keeping

Information and evidence relating to the response / investigation of an incident or complaint will be kept for a minimum period of two (2) years. Documents concerning any corrective measures imposed will be kept in the employee's file. If a complaint is unfounded, the information and evidence concerning the complaint will be destroyed after the expiration of the period of two (2) years. If a complaint is found to be false, malicious, frivolous or vexatious, the related documents will be kept in the complainant's employee file.

15. Protection against Retaliation

No employee will be subject to any form of retaliation or discipline for pursuing in good faith a report or complaint or for participating in the investigation of any such complaint. Boralex will not tolerate any form of retaliation against a person who reports, in good faith, a violation of this Policy, or who has participated in an investigation, regardless of the outcome of the complaint. Individuals who engage in such measures may be subject to administrative and/or disciplinary action up to and including dismissal.

16. Complaints made in Bad Faith

An employee who makes a report or complaint in bad faith or falsely accuses someone of conduct in violation of the Policy, will be subject to administrative and/or disciplinary action, up to and including dismissal.

17. Assessment and control of risks

In support of this Policy, Boralex has implemented workplace harassment and violence prevention procedures to protect employees from workplace bullying, harassment, and violence. Appropriate measures will be implemented to address reported hazards. Where hazards are identified, Boralex will take measures to control the hazards. These measures may include, but are not limited to:

- creating procedures to ensure safe work;
- communicating information about the nature and extent of the hazard of workplace harassment, bullying and violence including information related to specific or general threats of violence or harassment that exist or may exist; and
- implementation of emergency procedures.

Signed or Approved by: Marie-Josée Arsenault



Date: July 16, 2025

APPENDIX A

Workplace Violence Immediate Response Procedure

For incidents involving workplace violence where there is a serious threat or imminent danger:

- Go to a safe location at the workplace;
- Call 9-1-1;
- Refer to the [Emergency Response Plan](#) for more specific guidelines (bomb threat, active shooter, etc.), following the call to 9-1-1 if the situation involves the potential for immediate threat to workers inside the building.

When the situation has been stabilized, a Designated Person shall be contacted to arrange for debriefing of those either directly or indirectly involved in the incident, as necessary. If the police have not previously been summoned, Boralex may decide it is necessary to report an incident of workplace violence to police.

In situations in which the manager becomes aware of an incident of workplace violence, as defined by this Policy, the manager must report the situation in accordance with the requirements set out in the Policy.

When an employee expresses concern regarding his or her safety in the workplace owing to domestic violence, or when Boralex is aware or ought reasonably to be aware of such situations, the manager will work collaboratively with the employee and the Human Resources representative to develop a workplace safety plan for that employee and take any other reasonable precautions for the protection of its workers.

Where required, employees will be provided with medical attention, appropriate in the circumstances, including transportation to a medical facility.

If an employee is injured as a result of a workplace violence incident, the applicable provincial procedures for reporting a workplace injury, incident or accident, as the case may be, must be followed.

APPENDIX B

Contact information of the Designated Persons to Respond to Reports and Complaints in each jurisdiction

| Name(s) of the Designated Person | Client Portfolio | Title | Contact Information |
|----------------------------------|-----------------------------|---|---|
| Audrey Vigneault | Corporate Functions | Manager, HR | audrey.vigneault@boralex.com +1 819 352 6347 |
| Carlin Smith | North America Business Unit | Manager, HR | carlin.smith@boralex.com +1 251 406 7818 |
| Chantal Auger | Corporate Functions | Director, Corporate HR and Compliance | chantal.auger@boralex.com +1 514 235 7631 |
| Marie-Josée Arsenault | Boralex | Executive Vice President and Chief People and Culture Officer | marie-josée.arsenault@boralex.com +1 819 350 8595 |
| Pascal Hurtubise | Boralex | Executive Vice President and Chief Legal Officer | pascal.hurtubise@boralex.com +1 514 969 3824 |
| Stéphanie Légaré | North America Business Unit | Manager, HR | stephanie.legare@boralex.com +1 438 468 0662 |
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