

Policy Number 101-A

SUBJECT: RESPECT IN THE WORKPLACE

(Equal Employment Opportunity, Anti-Harassment)

Global Spectrum is committed to providing a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, harassment or retaliation.

Every Global Spectrum employee has the responsibility for ensuring that no employee is subject to discrimination, harassment or retaliation on the basis of member in a protected class. Therefore, Global Spectrum requires that all relationships among persons in the workplace be free of bias that is prohibited under Global Spectrums' Respect in the Workplace Policy which is detailed below.

- Employment decisions are based on merit, valid job qualifications and business needs, and are made regardless of race, color, creed, national origin, ancestry, religion, sex, age, disability, veteran status of any other classes protected under federal or provincial law.
- Global Spectrum prohibits harassment and discrimination by a fellow employee, supervisor, manager, or individuals who do business with Global Spectrum or on Global Spectrum premises (e.g., independent contractors, vendors, or business partners).
- Reasonable accommodations for an employee with a qualifying disability will be made when requested by the employee.
- Global Spectrum will not tolerate retaliation against any employee who, in good faith, truthfully reports potential harassment or discrimination or participates in an investigation of such a report. Prohibited conduct is unacceptable in any work-related setting, including business trips, business meetings, and business-related social events. If an employee experiences, witnesses or knows about the conduct or behavior contrary to this policy, the employee should report those concerns to any of the appropriate contacts, as designated in these policies. Individuals with supervisory responsibility are required to report any conduct or behavior that may violate this policy, regardless of how they learned of it.

I. SCOPE

Global Spectrum Respect In the Workplace Policy applies to all applicants and current employees, and prohibits harassment, discrimination, and retaliation (as defined below), whether engaged in by a fellow employee, supervisor, or manager. In addition, the policy also prohibits third parties who do business with Global Spectrum or on Global Spectrum premises (for example, independent contractors, vendors, or business partners) from engaging in harassment, discrimination, or retaliation against Global Spectrum employees.

Conduct prohibited by the policy is unacceptable in the workplace and in any work-related setting outside the workplace, including business trips, business meetings, and business-related social events.

A. Non-Discrimination

Equal employment opportunity has been, and will continue to be, a fundamental principle at Global Spectrum. Accordingly, all employment decisions will be based on merit, valid job qualifications and business needs, and will be made without regard to race, color, creed, national origin, ancestry, religion, sex, age disability, veteran status or any other classes protected under applicable federal or provincial law. Employment decisions include, for example, actions or decisions concerning recruiting, hiring, selection, placement, training, promotion, transfer, discipline, demotion, termination, wage review, compensation, performance evaluations, layoffs, recreational and social programs, the opportunity to participate in employment educational assistance, and to use company facilities.

B. Harassment Prevention

Global Spectrum is committed to maintaining a work environment that is characterized by mutual respect among employees. Thus, Global Spectrum has a zero-tolerance policy concerning illegal harassment and retaliation against individuals who report acts of harassment in the workplace.

Global Spectrum strictly prohibits all conduct which constitutes harassment on the basis of any individual's membership in a protected class or which may reasonably contribute to a harassing work environment. Covered protected classes are the same as those listed above under Non-Discrimination. This prohibition includes both sexual and gender-based harassment as well as harassment on other grounds such as race, disability, age etc. Different types of harassment are discussed in greater detail below.

1. Sexual Harassment

For the purposes of this Policy, sexual harassment includes (a) harassment of a sexual nature; including unwelcome sexual advances, requests for sexual favors, sexually-motivated physical contact, and other offensive verbal or physical conduct related to sex and (b) harassments on gender, which refers to conduct that is directed at employees because of their gender (for example, a male manager yells only at female employees and not males), especially (with respect to both sexual and gender-based harassment) where: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting that individual; or (ii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may involve individuals of the same or different gender. This means that males shall not engage in sexually harassing conduct directed toward persons of either gender or that female, likewise, shall not engage in sexually harassing conduct toward persons of either gender.

Sexual harassment may take the form of any of a range of subtle and not-so-subtle behaviors, which, depending on the circumstances, may include (without limitation) the following:

- Physical sexual advances or other physical conduct, including impeding or blocking movement, hugs, caresses, neck and shoulder massages, and any other physical contact that is offensive to another person.
- Verbal sexual advances such as requests for sexual favors, offensive flirtation and propositions, and repeated and unwanted requests for dates.
- Verbal conduct such as sex-oriented "joking", "kidding," or "teasing;" making derogatory or sexual comments; using sexual epithets and slurs, whistling and cat calls; referring to another as "babe", "honey" or similar names; discussing one's own sexual experiences; and creating or sending obscene or sexually-oriented messages, memos, and letters, including those created on or sent by computer, e-mail, or voicemail.
- Non-verbal, communicative conduct such as leering; making sexual gestures; pointedly looking at another's breasts, buttocks, or genital areas; and posting, showing, or circulating sexually-suggestive objects, pictures, images, cartoons, calendars, magazines, or posters (including through use of Global Spectrum's computer, internet, or email systems).



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2. Harassment Based on Any Protected Characteristic or Status

In addition to sexual harassment, Global Spectrum prohibits harassment based on any other protected characteristic or status identified above. Such harassment includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her creed, color, religion, national origin, ancestry, age disability, veteran status or other characteristic or status protected by applicable federal, or provincial law, where (i) enduring the offensive conduct becomes a condition of continued employment, or (ii) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile or abusive or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct of this nature can take many forms similar to those cited above under sexual harassment, and may include, for example:

- The use of epithets, slurs, or inappropriate or derogatory names.
- Negatively stereotyping persons or groups based on a protected characteristic or status.
- Jokes, pranks, or threatening, intimidating, or hostile acts that relate to an individual's protected characteristic or status.
- The creation, display, or circulation in the workplace of any written or graphic material (including e-mails, memos, graffiti, pictures, cartoons, or drawings) that denigrates, ridicules, or shows hostility or aversion toward an individual or group based on a protected characteristic, or status (including the use of Global Spectrum computer, internet, or email systems).

C. Reasonable Accommodation of Disabilities

Global recognizes its obligations to comply with disability discrimination laws and, in appropriate circumstances, to provide reasonable accommodation for employees who are disabled. Consistent with its obligations under the Ontario Human Rights Code and applicable federal laws, it is Global Spectrum intent in adopting this guideline to establish procedures for requests for reasonable accommodations and to alert employees about how such request will be handled.

1. Non Discrimination

It is Global Spectrum's policy in all employment-related decisions to give qualifying individuals with disabilities the same consideration afforded all other qualified individuals. No qualifying disabled individual will be denied or removed from consideration for employment or transfer or promotion to any position because: (a) that individual has a disability; (b) has a history of disability; (c) is perceived as having a disability; or (d) requires reasonable accommodation in order to perform the essential functions of the position.

2. Reasonable Accommodation

Global Spectrum will provide an effective "reasonable accommodation" for the qualifying disability of any eligible employee, provided that the accommodation does not impose an undue hardship. For example, to be a qualifying disability, the medical condition in question must substantially limit the employee in one or more major life activities and generally must be long-term or chronic. Not all medical conditions will qualify as disabilities.

3. Direct Threat to Safety

Global Spectrum may reject a disabled employee for a position or remove that employee from a position if Global Spectrum determines that the employee cannot perform the essential functions of the job without creating a direct threat to the safety or health of the employee or of other such threat to an acceptable level. Any direct threat determination will be made only after an individualized assessment is undertaken of the employee's specific limitation sand the essential functions of the particular position, in the same manner as a request for reasonable accommodation would be processed.

4. Requests for Accommodation

Global Spectrum cannot consider accommodations for an employee's medical condition of which it has no knowledge. Similarly, Global Spectrum will not anticipate or presume that any individual is disabled. If an employee believes that he or she as a qualifying disability and is in need of a reasonable accommodation, it is the responsibility of the employee to report these facts to Human Resources. To the extent feasible in addressing the employee's needs, Global Spectrum will treat all information concerning the employee's medical condition as confidential.

5. Interactive Dialogue

Once a request has been made, Global Spectrum through an interactive dialogue with the employee will determine if the medical condition is a qualifying "disability" and the nature of the limitations, if any, imposed by the condition. This information is critical to conduct a proper individualized assessment of any request for accommodation. The dialogue also will encompass what, if any, reasonable accommodations might be made to enable the individual to perform the full scope of his/her essential job functions. The dialogue also will encompass what, if any, reasonable accommodations might be made to enable the individual to perform the full scope of his/her essential job functions. The dialogue will include the employee, appropriate Global Spectrum representatives, and relevant medical professionals if helpful. The employee is obligated, as part of this interactive process, to participate, cooperate and provide requested information. It is important for employees seeking accommodation to understand that the law doesn't require Global Spectrum to provide any particular form of reasonable accommodation, or the employee's preferred or requested accommodation – only an effective accommodation that does not impose an undue hardship. For this reason, it may be necessary for the employee to suggest or consider alternative forms of accommodation.

D. Anti-Retaliation

Global Spectrum prohibits all forms of unlawful retaliation related to workplace discrimination, including, opposition, in a reasonable manner, to a practice believed to be unlawful discrimination or harassment, which is based on a reasonable, good faith belief, or participation in an employment discrimination proceeding, such as an internal investigation. However, false complaints made in bad faith may subject the complaining employee to disciplinary action.

Unlawful retaliation may occur when an employee suffers an adverse employment action (e.g. demotion, salary reduction, or termination) because he or she engaged in protected opposition (e.g. complaining to anyone about alleged discrimination, threatening to file a charge or discrimination or refusing to obey an order reasonably believed to be discriminatory).

Protected activity does not include actions that interfere with job performance or unlawful activities such as acts or threats of violence.

II. COMPLAINT PROCEDURE FOR REPORTING A VIOLATION OF THE POLICY

Global Spectrum is committed to responding swiftly and firmly to any acts of protected class discrimination, harassment or retaliation of which the company becomes aware, to implementing disciplinary process designed to strongly deter future acts of discrimination, harassment or retaliation, to eradicating any vestiges of a work environment that is hostile to any person on the basis of protected class membership, and to monitoring actively its workplace to ensure tolerance, respect and dignity for all employees.

A. Reporting Violations of Policy

Global Spectrum strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the identity, status, or position of the alleged offender. Whether the alleged offender is, for example, a Senior Vice President, a supervisor, a co-worker, or even a non-employee doing business with or at Global Spectrum (for example, an outside vendor), a report should be made.

If you believe that you have been subjected to conduct or behavior that may be contrary to Global Spectrum's Respect in the Workplace Policy or if you believe that you have witnessed or have report your concern promptly to any of the designated contacts identified below. **Individuals with supervisory responsibility are required to report such conduct or behaviour immediately, regardless of how they learned of it.** If any one of the designated contacts is the subject of a report, the reporting employee should address the matter to one of the other designated contacts. If any one of the designated contacts is non-responsive, the reporting employee should address the matter to one of the other designated contacts.

Designated Contacts

Global Spectrum

- Alice Fei, Vice President, Human Resources
- Nicole Orlosky, Director of Human Resources
- Alena Corke, Facility Human Resources Representative
- Scott Warren, Facility General Manager
- Tim Murphy, Facility Regional Vice President
- Brian Rothenberg, Vice President, Assistant General Counsel

Early reporting and intervention are pivotal steps for resolving actual or perceived incidents of discrimination, harassment, or retaliation. Therefore, while no fixed reporting period has been established, and all complaints will be investigated, Global Spectrum strongly urges the prompt reporting of complaints so that rapid and constructive action can be taken. Global Spectrum will make every effort to stop any misconduct, but can only do so with the cooperation of its employees.

The availability of this complaint procedure does not preclude any individual who believes that he or she is being harassed from promptly (i) advising the offender that his or her behavior is unwelcomed and (ii) asking that it be discontinued.

If an employee believes that s/he has been or is being harassed, s/he is encouraged to inform the offender that his or her behavior is unwelcome. The company also recognizes that is not necessary for an individual to talk directly to an offender if it would make the individual uncomfortable to do so.

Global Spectrum will endeavor or to receive, handle, and investigate complaints with the utmost discretion. Every effort will be made to maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective actions.

B. Investigation of Complaints

Global Spectrum will conduct a prompt, thorough, and impartial investigation of any allegations of harassment, discrimination, or retaliation that is reported in accordance with these complaint procedures.

When a report of harassing, discriminatory, or retaliatory conduct is made, an investigation will be promptly initiated. In most cases, the investigation will commence no later than 48 hours after the complaint is made.

The Human Resources department will assist management in the immediate and impartial investigation of all harassment, discrimination, or retaliation matters in as



confidential a manner as possible. It is the policy of Global Spectrum that all employees involved in the investigation maintains the confidential nature of the investigation, sharing information pertinent to the investigation only on a “need to know” basis. In all cases, the investigator will review the issue with the appropriate management personnel.

III. ADDRESSING VIOLATIONS OF THE POLICY

A. Responsive Action

Global Spectrum will take prompt and appropriate remedial action to address discriminatory, harassing, or retaliatory conduct and to prevent such conduct from occurring in the future. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as warning , reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension with or without pay, or terminations, as Global Spectrum believes appropriate under the circumstances.

B. False Report or Failure to Report

Any individual who knowingly makes a false report or knowingly provides false information during an investigation will be subject to appropriate disciplinary action. Any individual with supervisory responsibility will be subject to disciplinary action if he or she does not immediately report conduct or behavior that may violate this Policy.



Individuals who have questions about the complaint procedure for reporting a violation of The Respect In the Workplace Policy, or any other aspect of Global Spectrum Respect in the Workplace Policy, should contact the Human Resources Department.

RESPECT IN THE WORKPLACE POLICY ACKNOWLEDGEMENT FORM

I, _____ acknowledge and affirm that I have received a copy of Global Spectrum's Respect in the Workplace Policy (Equal Employment Opportunity, Anti-Harassment, Reasonable Accommodation of Disabilities & Anti-Retaliation) (the "Policy"). I have read the Policy thoroughly and understand its terms, requirement, and prohibitions. I consent to, and agree to abide by, all of the Policy's terms and conditions. I agree that if I have any question in the future about the application or terms of the Policy, I will seek clarification from the Human Resources Department.

Signature: _____ Date: _____

Employment Standards Act

Global Spectrum will comply with the Employment Standards Act of Ontario. A copy of the Act will be available from the human resources department or online at www.gov.on.ca . The act outlines but is not exclusive of the following items; minimum wage, breaks, vacation, pregnancy leave and parental leaves, severance pay and termination of employment.

Ontario Human Rights Code

Global Spectrum will comply with the Ontario Human Rights Code. OHRC defines for all citizens of Ontario their rights in regards to hiring, employment, racial and sexual harassment, sexual orientation, religious rights and their rights on drug and alcohol testing. Further information can be found online at www.ohrc.on.ca