

Policy Number 301-C

SUBJECT: WORKPLACE VIOLENCE

The safety and security of our workforce is of paramount importance to Global Spectrum. Each of us should feel that the working environment is free from violent actions and the threat of violent actions. Therefore, Global Spectrum has adopted a *zero-tolerance policy* with respect to all threats, threatening behaviour and acts of violence directed toward any individual or property.

Violations of this policy will not be tolerated and will lead to corrective action, up to and including termination of employment without prior warning. In addition, to the extent such conduct is criminal in nature; it may lead to arrest and prosecution.

Conduct Covered

Threatening or violent conduct prohibited by this policy extends to all forms of threats or violence occurring on Global Spectrum's premises and in the course of employment off Global Spectrum premises. Examples of conduct covered by this policy include: verbal threats, even if intended in a joking or jesting manner; physical horseplay; threats of physical conduct or harm; acts of intimidation; physical violence; fist fights; and the possession of any weapon or explosive device on Global Spectrum's premises. It also may include sabotage, defacing of property, belligerent or argumentative behavior or excessive swearing, particularly where such conduct carries an implied or explicit threat. This list is not intended to be exhaustive. Since it often is difficult to discern a joke from a serious threat, all conduct will be presumed to be serious until an investigation has been conducted, regardless whether the employee intended to carry out the threat or act.

Person Covered

This policy extends to all employees, including supervisors, managers and co-workers, as well as third parties visiting Global Spectrum's premises or transacting business with employees, including visitors, guests, contractors, subcontractors, vendor representatives and customers.

Resolving Problems Before Violence Occurs

Global Spectrum maintains an “open-door” policy with respect to an employee’s workplace concerns or issues. Employees should feel that they can approach members of management or the Human Resources Department to discuss their concerns before they feel compelled to resort to violence or threats. Employees will find in all circumstances that use of this open-door approach to solving problems is more likely to generate satisfactory solutions than threats or violence.

In addition to the open-door policy, Global Spectrum maintains an Employee Assistance Program or EAP. The EAP offers referral services designed to assist employees who are coping with difficult situations, including personal or family problems, stress and substance abuse. An employee who is experiencing these types of difficulties or who is thinking about violence as a solution to these difficulties is strongly encouraged to take advantage of the EAP *before* the situation leads to threatening or violent conduct.

Reporting Violations

All Global Spectrum personnel have an important role in enforcing this policy. It is critical that all threatening or violent conduct be reported immediately to management. Such incidents may be reported to your supervisor, the Human Resources Department or any other member of upper management. It is appropriate under this policy to report not just incidents that you have witnessed or which have been directed at you, but also those that you have been told about by another. Even without an actual threat, you should report any behavior you have witnessed and regard as threatening or violent, if such conduct is related to the job, occurs on the worksite or working time. Employees are responsible for making this report regardless of the relationship between the individual who initiated the threatening or violent conduct and the individual who was the target.

Protective or Restraining Orders

In some instances, an employee may apply or obtain a protective order or restraining order to prevent a third party from entering Global Spectrum’s premises. In such cases, the employee is required to report to the Human Resources Department that such an order has been issued and provide a copy of the order. The Human Resources Department will address with the employee the precautionary measures that any such order and prevent him or her from

entering the premises. Global Spectrum understands the sensitivity of this information and will treat it as confidential, except to the extent necessary to apprise others involved in taking precautionary measures.

Removal of Offenders and Investigation

Should any threatening or violent conduct occur, Global Spectrum reserves its right to remove from the premises the person(s) involved. In appropriate circumstances, such action shall be taken as swiftly as safety permits and may involve law enforcement officials. Any individual removed from Global Spectrum's property for violating this policy shall remain off the premises pending an investigation of the incident or incidents leading to the removal. Such investigation may include background checks (e.g. police reports, arrest records, criminal history) and searches of workspace used by or accessible to the individual and/or personal belongings present at the workplace. Removal from the workplace that results in time away from an employee's assigned duties during an investigation will be unpaid and treated as unexcused absenteeism.

Corrective Measures

At the conclusion of the investigation, Global Spectrum will take appropriate corrective measures. Such measures may include, but are not necessarily limited to, counseling, warnings, suspension, reassignment, discharge from employment, termination of the business relationship and/or criminal prosecution.