



HARASSMENT, DISCRIMINATION & WORKPLACE VIOLENCE POLICY

TABLE OF CONTENTS

The Cineplex No Tolerance Policy	2
To Whom Does this Policy Apply?	2
Employee Responsibilities	2
Management Responsibilities	3
Reporting Procedure for Harassment, Discrimination and Workplace Violence	3
Making a Complaint	3
Reporting Anonymously	4
Investigating a Complaint	4
Maintaining Confidentiality	5
Reporting Findings and Making Recommendations	5
Resolving the Complaint	6
Definitions	6
Discrimination	6
Examples of Discrimination Include	6
Harassment	7
Examples of Harassment Include	7
Violence	8
Domestic Violence at Work	8
Examples of Workplace Violence	8
Workplace	9
Safe Ways to Work	9
Safety Procedures for Management and Staff	9
Dealing with Disorderly Guests	10
Use of Security and Paid Duty Officers	11
Building Access Controls	11
Cash Handling Procedures	12
Cineplex Guest Code of Conduct	12
Risk Assessment	13
Signature Page	14
For British Columbia Employees Only	15
For Manitoba Employees Only	16
For Saskatchewan Employees Only	17
For Quebec Employees Only	18

Workplace Harassment, Discrimination, and Violence Policy

Cineplex Inc. and its subsidiaries (“**Cineplex**” or the “**Company**”) are firmly committed to providing a safe and inclusive work environment free from harassment, discrimination and violence in accordance with provincial and federal legislation. Cineplex will not tolerate any violence, discrimination or harassment of any kind by a guest, by another employee, or by a third-party conducting business with Cineplex.

Cineplex takes all complaints regarding workplace harassment, discrimination and violence seriously. All such complaints will be investigated and handled in a confidential manner (to the extent possible and subject to the requirements of law).

Retaliation or threats of retaliation toward anyone involved in a complaint investigation will not be tolerated and will be viewed as a violation of this Policy. Such behaviour will be investigated, and appropriate disciplinary action will be taken, up to and including termination of employment.

Equally, because false accusations or malicious complaints can have serious effects on innocent persons, the wilful misuse of this Policy, including making false accusations, will not be tolerated and may result in disciplinary action against the accuser up to and including termination of employment.

For the steps involved in reporting an incident, please view Reporting Procedure for Harassment, Discrimination & Violence below.

To Whom Does this Policy Apply?

This Harassment, Discrimination and Workplace Violence Policy (the “**Policy**”) applies to all Cineplex employees (including employees of all of Cineplex affiliates, subsidiaries and partners), board members, agents, contractors, business partners and any other persons who may be subject to or cause a threat of workplace harassment, discrimination or violence.

Every individual to whom this Policy applies has a responsibility to ensure that the work environment is free from violence, discrimination and harassment by:

- refraining from any form of workplace harassment, discrimination or violence
- reporting any incident of workplace harassment, discrimination or violence, or any incident of retaliation against any person for invoking this Policy
- cooperating with an investigation regarding incidents of harassment, discrimination or violence
- reading and understanding this document

Employee Responsibilities

All employees have the responsibility to treat each other with respect. All employees have a responsibility to report any instances of harassment, discrimination or violence to their manager or Human Resources. All employees are responsible for respecting the confidentiality of anyone involved in a harassment complaint.

Contact your manager immediately if you come into contact with an individual who exhibits

aggressive behaviour, engages in violence, the threat of violence, harassment or discriminatory behaviour of any kind, including hate speech.

For the steps involved in reporting an incident, please view the Reporting Procedure for Harassment, Discrimination & Violence below.

Management Responsibilities

Managers are responsible for fostering a safe work environment, free of harassment, discrimination or violence for all employees. Managers must set an example for appropriate workplace behaviour and deal with situations of harassment immediately upon becoming aware of them, whether or not there has been a complaint.

Managers are responsible for ensuring employees have the information they need to protect themselves. Management must ensure that each employee reads this Policy once they commence their employment with Cineplex and must post this Policy in a conspicuous place in the workplace.

When an incident of harassment, discrimination, violence, or threat of violence is reported, managers will investigate the situation and take appropriate action. This includes reporting all incidents of harassment, discrimination, violence, or threat of violence using the web-based Incident / Loss Reporting System. Managers must report all incidents of property damage, vandalism, threats, disorderly conduct, and violence as soon as possible after the event occurs.

Other actions can include:

- removing offending parties from the premises using the assistance of security officers, pay duty officers, or the police when necessary; and
- trespassing individuals from the location depending on the severity of the offence

Reporting Procedure: Harassment, Discrimination, and Workplace Violence

Cineplex has adopted the following procedure to ensure an objective investigation and prompt resolution of complaints of harassment (sexual, psychological, or otherwise), discrimination and workplace violence.

Reporting Harassment (sexual, psychological or otherwise) and Discrimination

Cineplex encourages any person to report complaints promptly. Any person who wants to report evidence of alleged activity that violates this Policy or which they otherwise deem to be improper should contact their immediate supervisor or such supervisor's manager. In instances where the employee or other personnel is not comfortable, for any reason, in addressing such concerns to their supervisor or manager of such supervisor, employees are encouraged to contact Human Resources directly or via Backstage at 1-800-856-2381, "Option 4" or backstage@cineplex.com .

Cineplex strongly encourages any person under the age of majority in their province who is living with or who is supported by their parents to inform them of their complaint and seek their support. However, Cineplex will also respect the wishes of such individuals who wish to keep

their complaints confidential from their parents (if legally permitted) subject to the general limitations on confidentiality described below.

Reporting Violence or Threats of Violence

Employees who are involved in any incidents or threats of workplace violence must report these to their manager immediately so that the manager can complete the Incident / Loss Reporting Form.

Incidents are assigned to home office personnel for review. All incidents are reviewed by the Director of Insurance and Operational Risk (in the Legal department) to determine whether the “recommendation for corrective action” as documented on the Incident / Loss Reporting Form is sufficient. Depending on the nature of the incident, investigations are also assigned for review by specific home office departments. Incidents relating to violence will be sent to the Human Resources department and the Risk Management department for further review. Follow up actions by these departments will be determined on an incident-by-incident basis.

Reporting Harassment, Discrimination, and Workplace Violence Anonymously

If employees are in any way uncomfortable reporting concerns in a manner that identifies them as the source of the report, there is an alternative method of reporting that protects employee anonymity. Anonymous messages may be left on the Backstage line at 1-800-856-2381, “Option 4” or via email at backstage@cineplex.com (or arrierescene@cineplex.com for French communication).

This line is checked daily for messages. If using the Hotline, employees are encouraged to provide as much specific information as possible, including names, dates, places and events that took place. Employees are free to make anonymous reports, with the understanding that any investigation may be hampered due to the inability to obtain a full and complete account of relevant and necessary facts from the employee or to ask additional questions or seek clarification as any investigation proceeds. An employee is not to be penalized for reporting an incident or participating in a workplace harassment investigation.

Investigating a Complaint

Human Resources or Risk Management, as applicable, will be made aware of and assist in conducting investigations under this Policy. If there is reason to believe that a complaint cannot be investigated objectively, Cineplex may retain an independent investigator. In instances where an investigation is to be conducted with respect to the direct reports of the CEO or SVP and above, Cineplex shall retain a third-party investigator to conduct the investigation.

The applicable department will speak with the responsible manager(s) to determine whether the complaint can be resolved through informal discussions with the complainant, the respondent and any other affected individuals. If an informal resolution is not appropriate, a thorough and fair investigation will be initiated to determine whether the specific facts alleged in the complaint are substantiated and, if so, whether they constitute a breach of this Policy.

In doing so, the applicable department will:

- gather evidence from the complainant, the respondent and other witnesses as appropriate;
- provide the respondent with an opportunity to address all of the facts alleged in the complaint and all additional facts gathered during the investigation that may constitute a breach of this Policy, prior to drawing conclusions;
- keep members of Cineplex senior management informed of the progress of the investigation; and
- consult with legal counsel, as necessary, for the proper conduct of the investigation.

Depending on the circumstances, the respondent may be placed on paid suspension during all or part of the investigation. Suspension of this kind is not a disciplinary penalty and does not imply any decision has been made about the allegations. An employee suspended pending investigation will continue to receive their full compensation and benefits during the period of suspension and will remain bound by their terms and conditions of employment. During a suspension, an employee must cooperate with investigative procedures such as interviews or document disclosure. Maintaining Confidentiality.

Maintaining Confidentiality

Cineplex will handle all information gathered from the complainant, respondent and other witnesses with discretion and due regard for personal privacy. All employees and agents of Cineplex who are given access to this information will only use and disclose it as necessary to the proper conduct of an investigation or as otherwise required by law.

Complainants and witnesses should be aware that Cineplex will give respondents an opportunity to respond to all allegations of misconduct and therefore cannot guarantee absolute confidentiality. The investigator (General Manager, Human Resources or Risk Management) will take steps to remind individuals of this limitation during an investigation.

Reporting Findings, Making Recommendations, and Record Keeping

At the conclusion of an investigation, the investigator will report to management, including information on the following: (a) if there has been a breach of this Policy; (b) if there has been no breach of this Policy; or (c) if the matter has been voluntarily resolved to the satisfaction of the complainant. If the investigator finds a breach of this Policy, it will recommend the actions that should be taken by management to restore a work environment free from discrimination, violence and harassment. The outcome of the investigation (meaning the summary) will be communicated to the complainant and respondent within ten (10) calendar days of the investigation being concluded, where practicable. The formal report must be completed within ninety (90) of the conclusion of the investigation. The formal report will not be disclosed to the complainant, respondent or witnesses involved in the investigation.

Cineplex will keep records of all complaints or incidents of workplace harassment including:

- a copy of the complaint or details about the incident;

- a record of the investigation including notes;
- copy of witness statements, if taken;
- a copy of the investigation report;
- a copy of the results of the investigation that were provided to the employee who reported workplace harassment and the alleged harasser; and
- a copy of any corrective action taken to address the complaint or incident of workplace harassment.

The documents associated with a workplace harassment complaint, incident and/or investigation will not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action or otherwise as required by law. Records will be kept for two (2) years.

Resolving the Complaint

Management will speak with the investigator to understand the investigation process and the basis for the conclusions and recommendations in its report. Management will then take action to restore a work environment free of harassment, discrimination and workplace violence.

Cineplex acknowledges that complainants may need to be assured that the matter has been properly addressed. Thus, subject to any legal constraints, Cineplex will generally provide complainants with broad information about the investigation process and assurance that Cineplex has taken measures to protect the complainant from any further harassment, discrimination and violence in the workplace.

Definitions

Discrimination

Discrimination means improper or adverse differential treatment in the workplace related to any of the personal characteristics protected by the human rights legislation in Canada, which varies by jurisdiction which may include, without limitation, gender, sex/pregnancy, sexual orientation, race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, age, record of offences, political beliefs or associations, language, social condition, marital status, family status and mental or physical disability (collectively “Protected Grounds”).

Examples of Discrimination include (whether verbal or written), but are not limited to:

- refusing to converse or work with an employee because of their racial, ethnic background or any other protected personal characteristic;
- insulting gestures or jokes based on sexual, racial, ethnic or other protected personal characteristics which cause embarrassment or awkwardness;
- use of racial epithets, language, verbal abuse (i.e. “hate speech”), or remarks; and/or
- the displaying of racist, derogatory, sexually suggestive or other offensive pictures or

material.

Harassment

Harassment means engaging in conduct that is known or reasonably ought to be known to be unwelcome. It can include a serious single act or repeated words, conduct or behaviour. In some instances, harassment includes conduct related to any of the Protected Grounds (“discriminatory harassment” or “sexual harassment”). Harassment also includes hostile or unwanted conduct, comments, actions or gestures that affect an individual’s dignity or psychological or physical integrity in the workplace (“psychological harassment” or “personal harassment”). The definition includes harassment and sexual harassment that occurs virtually through the use of information and communication technology.

Workplace sexual harassment means,

- a) engaging in a course of vexatious comment or conduct against a worker in a workplace 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 advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Examples of Harassment include, but are not limited to:

- unwelcome remarks or jokes about a person's body, attire, or gender;
- bullying or aggressive behaviour;
- displaying or circulating offensive pictures or materials;
- leering (suggestive staring);
- yelling, screaming or offensive language
- insulting or putting down an individual
- blaming someone else for errors
- spreading gossip or rumours
- giving someone the silent treatment or excluding them from group events
- name-calling, mocking or mimicking someone
- slamming a hand down on a table; and/or
- unwelcome physical contact of any sort

Examples of Sexual Harassment include, but are not limited to:

- unwelcome sexual solicitation or advances and reprisals or threats of reprisal for the rejection of a sexual solicitation or advance from a manager, supervisor or another person who has the

power to reward or punish the worker

- touching or brushing against an individual's clothing, body, or hair
- initiating unwanted sexual activity, such as kissing, touching, or hugging
- stalking an individual
- sexual assault
- body language, gestures, advances, or behaviour of a sexual nature
- sexualized comments or actions
- offensive jokes or comments of a sexual nature
- display of sexually offensive pictures, videos, or other materials, including on a computer or mobile phone
- questions or discussions about sexual activities

NOTE: Harassment or discrimination which occurs outside the workplace or outside work hours, but which has repercussions in the workplace, may also constitute a violation of this Policy. This includes unwelcomed, disrespectful or offensive communications which are communicated by email or text message and disrespectful or offensive posts on social media websites such as Facebook, Instagram, Twitter, etc. whether or not such communications are made using Cineplex's information technology system.

Violence means:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; and/or
- 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

Domestic violence at work:

Domestic violence at work means the physical harm or attempt or threat to physically harm the worker at work by a person who has a personal relationship with a worker, such as a spouse or former spouse, current or former intimate partner, or a family member.

Examples of Workplace Violence include, but are not limited to:

Examples of workplace violence include, but are not limited to:

- threatening behaviour such as shaking fists, destroying property or throwing objects;
- verbal or written threats that are an expression of an intent to inflict harm;

- verbal abuse such as swearing, insults, verbal abuse (i.e. hate speech), or condescending language;
- physical attacks such as hitting, shoving, pushing or kicking;
- use or threatened use of a weapon of any kind;
- destruction of Company property; and/or
- domestic violence that could cause physical injury to a worker in a workplace.

Workplace

Workplace means the working or work-related environment including the Company's offices, venues, and work sites, and any other location where Cineplex business is being conducted, and places where employees have gathered as a result of employment responsibilities or employment relationships. This includes offsite locations where Company business or social functions are being conducted (e.g. holiday parties, during business trips or on social media where employees interact without one another).

Safe Ways to Work

Safety Procedures for Management and Staff

- 1.1 At Cineplex, the first standard of service is the safety of employees and guests. As such, it is important that managers and staff are aware of the procedures to follow to ensure personal safety and how to respond to situations of violence or threats of violence.
- 1.2 The role of employees is to immediately report any suspicious circumstances, threats of violence, or acts of violence to management. Do not follow or confront anyone who is acting in a threatening or suspicious manner. Do not try to detain or delay this person. Do not engage in conversation with this person and remain a safe distance from them.
- 1.3 For incidents of violence or robbery, management should call the police and, where applicable, management should call security officers or mall security. Otherwise, the role of management is similar to the role of employees. Management should keep a safe distance and not accuse or engage this person in conversation that may escalate into violence. Management should try to focus on the incident as it unfolds, so they can provide information to the police, to security, or to their supervisor. Once time permits, report the occurrence using the Incident / Loss Reporting Form.
- 1.4 Employees are responsible for ensuring that they have a safe and reliable means of transportation to and from work. If an employee is coming to work or leaving work at their scheduled time and does not have a safe means of transportation, the employee must notify management prior to the start of the shift.

For situations where management requests that an employee start or end their shift at an unscheduled time, management must ensure that the employee has a safe means of transportation to and from work.

Dealing with Disorderly Guests

- 2.1 Employees should refer all incidents or potential incidents of disorderly guests to their manager as soon as possible and allow management to handle the situation.
- 2.2 When guests congregate in groups but have not exhibited any disorderly behaviour, management should make their presence known. This is the time to greet guests and make eye contact in a friendly and polite manner. Often groups will refrain from disorderly acts when management is friendly and when the group understands they are no longer anonymous to management.
- 2.3 Management should monitor the mood of a crowd to assess whether there is potential for illegal acts to occur. If there is a chance that the crowd will become unruly, management should contact security officers or the police. Extreme caution should be exercised.
- 2.4 No one should enter a crowd that is showing signs of unruly behaviour or try to disperse an unruly crowd. Observe from a safe distance. If there are instigators, try to get their descriptions for the police. Do not put anyone at risk. Property damage, although undesirable, can be fixed.
- 2.5 Most minor disturbances and nuisance situations can be dealt with simply by a verbal warning to those creating the disturbance. A polite warning to stop, citing the infraction and requesting the guest's cooperation, should resolve the problem, and no further action may be required.
- 2.6 If a verbal warning is not effective, it may be necessary to explain to disorderly guests that they are on private property and are subject to the rules laid out by Cineplex. Management can provide these rules to disorderly guests by handing them the Guest Code of Conduct contained in Appendix 2. The Guest Code of Conduct is a document which lists rules for the behaviour of guests while on Cineplex property. The Guest Code of Conduct was designed to maintain a safe and pleasant environment for employees and guests.
- 2.7 If the guest continues the disorderly behavior or otherwise violates the Guest Code of Conduct, they should be asked to leave the property by a manager. If a guest does not comply with the request to leave then management should call security (if applicable), or call the police.
- 2.8 At no time should staff physically touch, detain, confront, or argue with a guest. At no time should staff touch a guest's personal property without the guest's permission. At no time should staff leave the building in pursuit of any guest under any circumstances.
- 2.9 More serious violations of the Guest Code of Conduct, or repeated violations of the Guest Code of Conduct where the offenders have been warned before, may call for a "trespass notice". A trespass notice is a formal warning that the offenders will be arrested as trespassers if they return to the property during the time period for which the trespass notice is issued.
- 2.10 When delivering a trespass notice, managers should refer to the memo explaining how

to issue one; the memo is available on the portal page for the Legal department.

Use of Security and Paid Duty Officers

- 3.1 Security officers, also known as security guards, and pay duty police officers are hired by management with approval from the Executive Director of Operations when both agree that the location may be at risk for disorderly or unlawful guest activity that is unmanageable with existing staff.
- 3.2 Managers should routinely review incident reports and recommend to their Executive Director of Operations when officers should be added or discontinued. Management must understand and communicate duties and responsibilities to officers and monitor their performance to ensure that they are meeting expectations.

Building Access Controls

- 4.1 Cineplex employees have a responsibility to safeguard employees, guests, and assets and to maintain the safety and security of the building. Employees should never take an action that would put themselves or others at risk.
- 4.2 No one should enter or leave the premises if they see any suspicious circumstances inside or outside the building. Before entering or leaving the premises, if there are any suspicious vehicles or people outside the premises, the closing or opening personnel should remain in a safe area and call the police to investigate. While entering or leaving the building, if anything looks out-of-place, retreat to a safe area and call the police.
- 4.3 If someone demanding money or other property confronts an employee, and if that employee's safety is in question, the employee should not resist the demands.
- 4.4 During operating hours, floor staff must routinely check all non-public and emergency exterior doors to confirm they are closed and locked. Any unusual circumstances, such as doors intentionally propped open, should be reported to management immediately.
- 4.5 When the premises closes and enters its non-operating mode, management or authorized staff must test all exit doors by physically pushing each door to determine that it is properly closed. Where possible, this procedure should be done in pairs. If there are areas of the premises where staff feels unsafe, this should be escalated to management.
- 4.6 During non-operating hours, employees should only grant others access to the building when authorized to do so by management. If the person requesting access is not known, positive identification must be obtained before granting access.
- 4.7 Buildings should be opened by management personnel. Staff are not permitted to open the premises (be the first employee to enter the building) unless accompanied by a Manager. Staff are not permitted to close the premises (be the last employee to leave the building), unless accompanied by a Manager. For some circumstances, such as providing access to the building for groups for rentals, senior staff with authorization from management are permitted to open the building.
- 4.8 Only Managers can provide keys, codes and safe combinations to employees. No one

else is allowed to provide others with the keys, codes or safe combinations that have been given to them in confidence.

- 4.9 Everyone with codes and safe combinations should exercise caution when entering them, so that no one else inadvertently obtains them. No one is allowed to share keys, codes, or safe combinations given to them in confidence.
- 4.10 If a key is lost or stolen, that fact should immediately be reported to the proper management.

Cash Handling Procedures

- 5.1 Proper cash handling procedures are essential in creating operating environments that minimize exposure to losses due to robbery, theft, or error.
- 5.2 Where available, doors leading to point-of-sale areas from public areas must remain closed and locked at all times.
- 5.3 When operators leave their sales terminal devices for any reason other than the normal processing and preparation of an order, it is their responsibility to ensure they lock their cash drawer, secure their PIN Pad and cash drawer key, and log off from their Point of Sale Terminal.
- 5.4 Locations with drop safes should use them whenever possible to protect the employees and funds. When drop safes are used, only management should have access to the key for the drop safe.
- 5.5 To ensure the safe movement of funds between the office and Point of Sale Terminals, all physical movement of funds should be conducted with two parties. Funds must be transported in a zippered, opaque pouch or equivalent, and the movement of funds must be made uninterrupted with no additional tasks performed during this transfer.
- 5.6 Where pneumatic tube systems are available, they should be used to transport of all bills from the box office to the office, including the last transport of bills.
- 5.7 Operators are not permitted to leave with funds from their cash drawer unless supervised by a member of management. This applies to the creation of drops and end-of-shift cash up. Operators are not permitted to leave with funds from their cash drawer unless supervised by a member of management. This applies to the creation of drops and end-of-shift cash up.

Cineplex Guest Code of Conduct

We are committed to providing a safe, comfortable and enjoyable entertainment experience for our guests. To achieve this goal, we ask that our guests conduct themselves respectfully and in accordance with the terms of this [Code of Conduct](#).

Risk Assessment

The Risk Management Department will maintain a risk assessment identifying risks at all Cineplex properties. The Risk Assessment is based on the following criteria:

- Reported incidents of disorderly conduct, fraud/personal theft, malicious damage/loss of property, and harassment/threat/violence;
- An assessment of whether the location is in a high-risk neighbourhood, town or city; and
- An assessment of whether the building is designed in a way that some staff members are isolated or at risk e.g. POS terminals on the street and lobby on an upper level or the entire building is isolated from other retail outlets or the community.

Reported Incidents

Risk Management obtains a summary of incidents from the web-based Incident / Loss Reporting System and assigns a risk rating based on the number of incidents reported by location.

The scale is as follows:

1 = no incidents, 2 = 1-3 incidents, 3 = 4-6 incidents, 4 = 7-9 incidents, 5 = 10-12 incidents, 6 = 13-15 incidents, 7 = 16-18 incidents, 8 = 19-21 incidents, 9 = 22-24 incidents, 10 = 25+ incidents.

Risk Management also adds a Severe Incident Rating (up to a maximum of 3) to some high severity incidents such as armed robbery, shooting, and knife violence using the following rating: 3 = severe violence (shooting, knifing, major assault); 2 = robbery, pepper spray; threat to surrounding locations; 1 = display of a weapon, break & enter, bomb threat, verbal threat of death/injury, minor assault, extensive damage/loss, threat to surrounding locations.

The severity factor is used to increase the overall risk at locations where these severe incidents have occurred, and this is on-going throughout the year.

Assessment of Location and Building Design Risk

Risk Management assigns a risk quotient to each location using the following scale to determine risk:

1 = very low, 2 = low, 3 = moderate, 4 = high, 5 = very high. The determination of risk is based on the judgment of senior Risk Management personnel and is validated for each location by the Executive Director.

The risk assessment process results in an overall risk rating on a scale of **1 to 10** by location. These results are used by the Risk Management department and shared with the Senior Manager of Health and Safety, the Executive Directors of Operations, and location General Managers. The results are used to determine:

- Security upgrades, including Digital Video Recording Systems (DVRS) and alarm coverage;
- Recommendations on the use of security and pay duty officers; and/or
- Implementation of new procedures and policies and changes to existing security

procedures and policies.

In addition, Risk Management monitors the Incident / Loss Reporting System on an ongoing basis and is prepared to adjust risk ratings as required throughout the year.

General Manager or Equivalent Responsibilities

General Managers and their equivalent in other business units will update their local Health and Safety Committee with the results of the risk assessment and actively work with their Committee to address the risks.

Health & Safety Responsibilities

The Senior Manager, Health & Safety is responsible for reviewing the risks associated with the Cineplex workplace. If a new risk to workers is identified at Cineplex, the Senior Manager must:

- Establish procedures, policies and work environment arrangements to eliminate the identified risk to workers;
- If elimination of the risk is not possible, establish procedures, policies and work environment arrangements to minimize the identified risk; and
- Make necessary changes to workplace violence procedures outlined in this document if required.

Approved: March 5, 2025

Ellis Jacob
President & CEO, Cineplex Entertainment LP

General Manager or Designee
Cineplex Entertainment LP

Date: _____

SPECIFIC PROVISIONS FOR EMPLOYEES IN THESE PROVINCES FOLLOW:

British Columbia
Manitoba
Saskatchewan
Quebec

FOR BRITISH COLUMBIA EMPLOYEES ONLY

Under this Policy, bullying and harassment:

- Includes any inappropriate conduct or comment by a person towards an employee that the person knew or reasonably ought to have known would cause that employee to be humiliated or intimidated; but
- Excludes any reasonable action taken by an employer or supervisor relating to the management and direction of employees.

Bullying and harassment may include:

- Incidents that adversely affects an employee's psychological or physical well-being;
- Repeated humiliation or intimidation that adversely affects an employee's psychological or physical well-being; and/or
- A single instance so serious that it has a lasting, harmful effect on an employee.

FOR MANITOBA EMPLOYEES ONLY

As required by Manitoba's Workplace Safety and Health Act (C.C.S.M. c.W210) and the Workplace Safety Health Regulation, Man Reg 217/2006, notwithstanding any other provision stated in this Policy:

- A worker has the right to file a complaint with the Manitoba Human Rights Commission (Workplace Safety and Health Regulation, Man Reg 217/2006 ss. 10.2(1)(e)); and
- This Policy is not intended to discourage or prevent the complainant from exercising any other legal rights pursuant to any other law (Workplace Safety and Health Regulation, Man Reg 217/2006 10.2(1)(f)).

FOR SASKATCHEWAN EMPLOYEES ONLY

As required by Saskatchewan's *Occupational Health and Safety Act*, Regulation 36 and *The Saskatchewan Human Rights Code*, this Policy includes the following:

Definition of Harassment: Harassment Based on Prohibited Grounds

This includes any inappropriate conduct, comment, display, action or gesture by a person that:

- is made on the basis of race, creed, religion, colour, sex, sexual orientation, marital
- status, family status, disability, physical size or weight, age, nationality, ancestry or place of origin; and
- constitutes a threat to the health or safety of the worker.

This type of harassment is prohibited in *The Saskatchewan Employment Act* and the *Saskatchewan Human Rights Code*.

It also extends to sexual harassment, which is conduct, comment, gesture or contact of a sexual nature that is offensive, unsolicited or welcome.

Sexual harassment may include:

- a direct or implied threat of reprisal for refusing to comply with a sexually-oriented request;
- unwelcome remarks, jokes, innuendos, propositions or taunting about a person's body, attire, sex or sexual orientation;
- displaying pornographic or sexually explicit pictures or materials;
- unwelcome physical contact;
- unwelcome invitations or requests, direct or indirect, to engage in behavior of a sexual nature; or
- refusing to work with or have contact with workers because of their sex, gender or sexual orientation.

Personal Harassment

This includes any inappropriate conduct, comment, display, action or gesture by a person that:

- adversely affects a worker's psychological or physical well-being; and
- the perpetrator knows or ought to reasonably know would cause the worker to be humiliated or intimidated.

Personal harassment must involve repeated conduct or a single, serious incident that causes a lasting harmful effect on the worker. All incidents of inappropriate conduct should be appropriately addressed to ensure that the workplace remains respectful and free of harassment.

Personal harassment may include:

- verbal or written abuse or threats;
- insulting, derogatory or degrading comments, jokes or gestures;
- personal ridicule or malicious gossip;
- unjustifiable interference with another's work or work sabotage;
- refusing to work or co-operate with others; or
- interference with or vandalizing personal property.

Other Options for Complainants

Nothing in this Policy prevents or discourages a worker from referring a harassment complaint to the Saskatchewan Occupational Health and Safety Division under the Saskatchewan Employment Act and regulations in order for an occupational health officer to resolve complaints of harassment.

A worker may also file a complaint with the Saskatchewan Human Rights Commission under *The Saskatchewan Human Rights Code*.

A worker also retains the right to exercise any other legal avenues available.

FOR QUEBEC EMPLOYEES ONLY

This Policy also includes the following definition:

“psychological harassment” means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee’s dignity or psychological or physical integrity and that results in a harmful work environment for the employee. 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.

Retention period of documents

- The documents associated with a workplace harassment complaint, incident and/or investigation will not be disclosed unless necessary to investigate an incident or complaint of workplace harassment, take corrective action or otherwise as required by law. Records will be kept for on for (2) years.

Measures to ensure confidentiality

- Investigation documentation will be stored in employee personal file (physical file in employee file at venue in a locked cabinet) and restriction shall remain limited to HR and/or the General Manager as appropriate.

Specific information and training programs on psychological harassment prevention offered

The following training programs on psychological harassment prevention are mandatory for all Cineplex employees and managers:

- *Preventing Workplace Harassment and Bullying for Employees*; and
- *Preventing Workplace Harassment and Bullying for Managers*.