AtkinsRéalis

Procedure

WORK RELATED DISCRIMINATION, HARASSMENT AND VIOLENCE

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Custodian:	Vice-President, HR Operational Excellence
Approved by:	Chief Human Resources Officer
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Purpose

The purpose of this ***procedure*** is to confirm ***AtkinsRéalis'*** commitment to providing and maintaining a work environment that is free of ***discrimination, harassment*** and ***violence*** ("DHV") and to ensure its ***personnel*** are treated with respect and dignity. ***AtkinsRéalis*** prohibits any behavior or action that is violent, intimidating, hostile, degrading, humiliating or offensive and will act to prevent DHV and promptly resolve any related matters.
This ***procedure*** also confirms ***AtkinsRéalis'*** commitment to compliance with applicable human rights, labour and employment legislation as it relates to DHV in the countries where it conducts business. It is designed to support the creation of a safe and secure ***workplace*** in which individuals can be their true self and feel free to come forward with complaints without fear of ***retaliation***.

Revision Index

Version	Issuance Date	Revision Details
1.0	2016-10-12	Publication
2.0	2018-06-29	Updated title and content to include the notion of "Discrimination"

Version	Issuance Date	Revision Details
3.0	2019-05-30	Updates to reflect the new organizational structure and to meet legislative requirements in Ontario, Canada
4.0	2020-05-04	Clarification added that timelines mentioned in this ***procedure*** are subject to any local legislative requirements and other edits to align with the new template.
5.0	2022-10-06	This version includes the following changes: • Removed all provisions specific to regional requirements. Regional requirements are part of regional HDV ***procedure***, where those are required Removed sections which were repetitive or included in other ***governance documents***
5.1	2023-12-01	Issuance in new template with new company brand
5.2	2024-06-14	Added document classification; minor revision for hyperlink updates; changed the title of the ***procedure***'s approver to align with the ***company***'s new structure
6.0	2024-08-26	Replaced "victim" with "complainant" or "targeted personnel" Further clarified that ***personnel*** will have access to required information and training to act and behave in line with this ***procedure*** Explained how ***personnel*** should request assistance and support during the investigation process Added restriction regarding representation/support during interviews
7.0	2026-06-30	Clarified that the Disciplinary and Performance Management ***procedure*** applies to our ***personnel*** only. Revised language in sections 4.3 Conflict Resolution and 4.4 Investigations so that it aligns with current practices.

1. Scope

The ***scope*** of this ***procedure*** is defined in the Global Glossary.

2. Audience

This ***procedure*** applies to all ***AtkinsRéalis personnel***.

3. Definitions

All terms in ***bold and italics*** are defined in the Global Glossary.

4. Guiding principles

4.1 Principles

DHV of any nature in the ***workplace***, online or at any ***AtkinsRéalis*** work-related function or event is unacceptable.

Actions and/or behaviors amounting to DHV from ***business partners***, providers, ***clients***, and any other ***stakeholders*** towards ***AtkinsRéalis personnel***, or vice-versa, will not be tolerated.

AtkinsRéalis will take all reasonable steps to ensure the physical and psychological wellbeing of its ***personnel*** is preserved and will seek to protect them from a DHV incident and provide any required support.

4.2 Communication and enforcement of the procedure

AtkinsRéalis will communicate and promote compliance with this ***procedure*** by taking all reasonable steps to:

- make all members of its ***personnel*** aware of its existence and content;
- train those responsible for receiving or investigating incidents or complaints and deciding upon corrective measures;
- conduct an objective and timely investigation following an incident or complaint; and,
- take timely ***corrective actions*** and/or disciplinary measures.

AtkinsRéalis will ensure this ***procedure*** and its related processes are implemented and maintained and members of its ***personnel*** have access to the required information, training and instructions to act and behave in accordance with this ***procedure*** and expectations set in the Code of Conduct with respect to DHV.

4.3 Conflict resolution

Where a conflict between individuals results in or is caused by a situation of DHV, ***AtkinsRéalis*** favours resolving any situation or conflict as soon as possible, in a manner that is fair to and respectful of all parties involved. Coaching, counselling, training, facilitation and mediation can, in many instances, resolve an issue and prevent a situation from escalating.

Where appropriate and safe to do so***, personnel*** who believe they are or have been the subject of ***discrimination*** or ***harassment*** may choose to communicate to the other party that their behaviour is unwelcome, offensive and contrary to this ***procedure*** and the Code of Conduct. In any situation of ***discrimination*** or ***harassment***, ***personnel*** should

report the situation to their Human Resources Business Partner (***HRBP***), immediate ***manager***, a member of management or by using the Reporting Line.

4.4 Investigations

For situations that cannot be addressed through a conflict resolution mechanism, any person who has been subjected to or witnessed an incident of DHV must immediately report the incident to their ***HRBP***, their immediate ***manager***, a member of management or by using the Reporting Line. Any DHV incidents which may constitute a criminal offence must be reported to the Regional Security Director.

Allegations of DHV must be promptly investigated. The investigation will include:

- a documented interview with the complainant;
- a documented interview with the respondent(s);
- a documented interview with any witnesses with potentially relevant information; and
- any other step the investigator deems necessary to fully and fairly investigate the complaint or incident.

All ***personnel*** should discuss their assistance and support needs during the investigation process with their ***HRBP*** or the investigator. ***AtkinsRéalis*** will make every effort to respond to those needs.

The investigator will take the necessary measures and make reasonable arrangements to ensure the investigation is conducted in a confidential and unbiased manner. This may include, where appropriate, requiring a ***third party*** to conduct the investigation. Where appropriate and in accordance with applicable laws, individuals may request to be accompanied by a support person during an investigation. The support person's role is limited to providing support and does not extend to advocacy, responding to questions, or otherwise participating in or disrupting the investigation process.

In the absence of a complaint, ***AtkinsRéalis*** may investigate any circumstances which are believed to constitute a violation of this ***procedure*** or provisions of the Code of Conduct related to DHV.

Upon conclusion of the investigation, ***AtkinsRéalis*** will communicate with the complainant and respondent to inform them that the investigation has been concluded and whether the facts uncovered during the investigation support the allegations. ***AtkinsRéalis*** will also ensure that any ***corrective actions*** and/or disciplinary measures are taken.

4.5 Workplace violence

Personnel subjected to ***workplace violence*** should, as soon as possible, go to a safe location at the ***workplace*** and report the incident. Immediate action must be taken to protect targeted ***personnel*** from further harm.

4.6 Corrective actions and disciplinary measures

DHV incidents for which the allegations are determined to be founded may result in ***corrective actions*** to help prevent recurrence and/or disciplinary measures for members of ***personnel*** found to have engaged in DHV. Disciplinary measures for ***personnel*** will be applied in accordance with our Discipline and Performance Management ***procedure***.

For those who engaged in conduct in violation of this ***procedure*** against ***AtkinsRéalis personnel***, and who are not ***AtkinsRéalis personnel***, the ***company*** will take all reasonable steps to report these situations to the appropriate party and have these individuals held to account in accordance with the applicable procedures.

4.7 Confidentiality and data protection

Complainants, respondents, witnesses, investigators and others involved in a DHV matter are responsible for always conducting themselves with appropriate discretion and maintaining confidentiality regarding any incident or complaint.

Confidentiality is the general rule, and any data collected will be protected and processed in line with ***AtkinsRéalis'*** Employee Privacy Notice ***work instruction***. Furthermore, any arbitration, administrative or court proceedings arising out of a complaint may compel ***AtkinsRéalis*** to disclose information about such a complaint, even though any such disclosure will be permitted only to the extent required by law or as necessary for the proper investigation and resolution of the complaint.

5. Exceptions and deviations

To request an exception or ***deviation*** from this ***procedure***, please consult the Deviation Process ***work instruction*** and use the Deviation Tool.

6. Guidance

For questions or further information with respect to this ***procedure***, please contact your ***HRBP***.

Controls and tasks related to this document
1. Allegations of DHV, which are not or cannot be resolved through a conflict resolution mechanism, are promptly investigated.
2. DHV incidents that may constitute a criminal offence are reported to the Regional Security Director.
3. ***AtkinsRéalis*** has taken all reasonable steps to ensure the physical and psychological wellbeing of its ***personnel*** is protected and preserved and will seek to protect members of its ***personnel*** from a DHV incident and to support them.

Related documents & regulations
Code of Conduct
Discipline and Performance Management ***procedure***
Employee Privacy Notice ***work instruction***
Human Resources ***policy***
Compliance ***procedure***
Reporting ***work instruction***