

Discrimination, Harassment & Violence in the Workplace Standard

ST.HR002

Brief Description: Defines the minimum requirements for preventing and addressing discrimination, harassment and violence in the workplace.

Version: 1.0

Last Updated: June, 2013

Reviewed Date: July 1, 2013

Next Update: July 1, 2014

Standard Owner: Lisa Zangari, Senior Vice-President, Human Resources

Document Owner: Lisa Parker, Senior Manager, Talent Management & Organizational Effectiveness

Document Reviewer: Lisa Zangari, Senior Vice-President, Human Resources

Related Documents: Code of Business Conduct and Ethics
Whistleblower Policy and Standard
Diversity Standard

Contents

- 1.0 Purpose 3
- 2.0 Scope 3
- 3.0 General Principles 3
- 4.0 Discrimination 3
 - 4.1 Definition 3
 - 4.2 Examples 3
- 5.0 Harassment 4
 - 5.1 Definition 4
 - 5.2 Examples 4
- 6.0 Violence 5
 - 6.1 Definition 5
 - 6.2 Examples 5
- 7.0 Roles and Responsibilities 5
 - 7.1 Employee, Contractor and Representative Responsibilities 5
 - 7.2 Employer Responsibilities 5
- 8.0 Complaint Resolution 6
- 9.0 Investigation 7

1.0 Purpose

The purpose of this standard is to define the minimum requirements IAMGOLD Corporation (“the Company”) employees, contractors and representatives are required to follow in preventing and addressing harassment, discrimination and violence in the workplace.

This standard will be updated by the document owner and reviewed by the document reviewer at a minimum, annually.

2.0 Scope

This standard applies to all employees, contractors and representatives worldwide, including joint ventures, and to all activities that occur while on Company premises or while engaging in Company business activities or social events.

3.0 General Principles

All employees, contractors and representatives are entitled to work in an environment free from discrimination, harassment and violence in which all individuals are treated with respect and dignity. As such, the Company will not tolerate any form of discrimination, harassment or violence. Any employee, contractor or representative whose behaviour constitutes discrimination, harassment or violence will be subject to disciplinary action, including, without limitation, termination for cause, and further legal action.

4.0 Discrimination

4.1 Definition

Workplace discrimination means any action, policy or differential treatment (either intentional or unintentional) having an adverse impact on an individual on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, pregnancy, sexual orientation, gender identity, gender expression, age, marital status, family status, disability or other unmeritorious consideration.

4.2 Examples

Workplace discrimination includes the use of stereotyped images or language, including jokes and anecdotes, which suggest that all or most employees, contractors and representatives of a particular group of people are the same, thereby, denying their individuality as persons, which may have the effect

of interfering with an employee, contractor or representative's work performance, or creating an intimidating, hostile or offensive work environment.

5.0 Harassment

5.1 Definition

Workplace harassment means a course of inappropriate comments or actions against an employee, contractor or representative in a workplace that is known or ought reasonably to be known to be unwelcome. This would include, without limitation, unwelcome remarks or gestures or conduct that may be detrimental to an employee, contractor or representative's physical or psychological dignity or well-being, or which may otherwise cause unreasonable discomfort to the employee, contractor or representative. Harassment can occur, but is not limited to occurring on any of the same grounds as discrimination.

5.2 Examples

Workplace harassment can take many forms. For the purpose of this standard, workplace harassment includes, without limitation, abuse of authority, poisoned work environment, psychological harassment, workplace bullying, sexual harassment and verbal harassment. The following provides details on the categorizations of workplace harassment:

- **Abuse of Authority** - an individual misuses the power and authority inherent in a position to improperly interfere with or influence a person's career. Examples of abuse of authority include, but are not limited to, intimidation, threats, blackmail or coercion. Abuse of authority does not include reasonable, warranted comments or actions.
- **Poisoned Work Environment** - characterized by any activity or behaviour, not necessarily directed at anyone in particular, that creates a hostile or offensive workplace. Examples of poisoning a work environment include, but are not limited to, sexual, racial or religious insults or jokes through graffiti or other means, abusive treatment of an employee and the display of pornographic or other offensive material.
- **Psychological** – includes humiliating or abusive behaviour that may lower a person's self-esteem or may cause the person torment. This can take the form of verbal comments, actions or gestures, and even escalate to workplace bullying. **Workplace Bullying** is repeated, health-harming mistreatment of one or more persons (the targets) by one or more perpetrators that takes one or more of the following forms: verbal abuse; offensive conduct/behaviors (including nonverbal) which are threatening, humiliating, or intimidating; work interference (sabotage) which prevents work from getting done.
- **Sexual** - includes the behaviours listed below:
 - Making unwelcome sexual advances
 - Unwelcome physical touching
 - Making any request for sexual favours
 - Making remarks or aspersions of a sexual nature relating to the other person
 - Subjecting another person to unwelcome conduct of a sexual nature, including through conversation, action or the display of material the other person finds sexually offensive
- **Verbal** - may include stereotyping, name-calling, insults, threats, slurs, crude, degrading, suggestive or unwelcome remarks, offensive songs, videos or tapes, jokes or innuendoes based on group membership including, but not limited to, race, colour, gender, pregnancy, sexual orientation, marital

or family status, age, religious or political conviction, language, ethnic or national origin, social condition, or physical or mental disability.

6.0 Violence

6.1 Definition

Workplace violence is any physical assault, attempted physical assault or threatening behaviour occurring in the workplace. The workplace may be any permanent or temporary location where an employee performs work related duties.

6.2 Examples

Examples of workplace violence can include, but is not limited to,

- The exercise of physical force by a person against another, in a workplace, that causes or could cause physical injury to the person.
- An attempt to exercise physical force against a person, in a workplace, that could cause physical injury to the person.
- A statement or behaviour that it is reasonable for a person to interpret as a threat to exercise physical force against the person, in a workplace, that could cause physical injury to the person.
- Physical acts, e.g., hitting, shoving, pushing, kicking, sexual assault.
- Any threat, behaviour or action which is reasonably interpreted to carry the potential to harm or endanger the safety of others, result in an act of aggression, or destroy or damage property.
- Disruptive behaviour that is not appropriate to the work environment, e.g., yelling, swearing.

Acts of workplace violence may occur as a single event or may involve a continuing series of incidents.

7.0 Roles and Responsibilities

7.1 Employee, Contractor and Representative Responsibilities

Employees, contractors and representatives are responsible for adherence to this standard and for working together and resolving issues in a professional manner. If issues cannot be mutually resolved, they are to be brought to the attention of their immediate supervisor.

Employees, contractors and representatives must also cooperate in the investigation of an incident. Anyone who gives evidence or information in an investigation or is involved in the process must keep this information confidential.

Where immediate assistance is required for situations of violence, employees, contractors and representatives should contact security or emergency services.

7.2 Employer Responsibilities

Managers and supervisors are responsible for creating and maintaining a discrimination, harassment and violence-free workplace and have the additional responsibility to act immediately on observations or allegations of any of these acts.

Management will not disclose the name of a complainant or the circumstances of the report to anyone except where disclosure is:

- Necessary to investigate the report
- Required to take remedial action
- Required by law

The local Human Resources designate is responsible for communicating this standard as well as for appropriate training programs at each location; corporate offices are the responsibility of the Senior Vice-President, Human Resources.

8.0 Complaint Resolution

Any individual who is subjected to workplace violence or violent behaviour and who feel they are in immediate danger should contact security, or where necessary, contact emergency services. If there is not an immediate threat to their wellbeing any individual who feels discriminated against, harassed or is subjected to workplace violence is encouraged to explain to the person perceived to be subjecting them to this that the conduct is unwelcome, but are not obligated to do so. If addressing the person responsible for the discriminating, harassing or violent behaviour could lead to an escalation in the harassment/discrimination/violence, or to safety risks, he or she should not directly interact with that person. If a complainant feels that they can safely make it known to the person responsible for the discriminating, harassing or violent behaviour that the behaviour is unwelcome, this may resolve the matter, or may assist them later if they make a complaint.

If the situation cannot be resolved by speaking to the person responsible for the act, a complaint may be made by speaking to your immediate supervisor and/or the site Human Resources Business Partner. All complaints must be brought to the attention of the Senior Vice-President, Human Resources through the site HRBP to ensure proper investigation and resolution.

The complaint should be made in writing, including details of:

- What happened – a description of the events or situation
- When it happened – dates and times of the events or incidents
- Where it happened – location of the events or incidents
- Who saw it happen – the names of witnesses, if any

The person receiving the complaint will notify the person(s) complained against (“the respondent(s)”) of the complaint and provide the respondent(s) with a copy of the written complaint.

No person shall be disciplined or retaliated against for bringing forward a complaint in good faith, providing information related to a complaint, or assisting in the resolution of a complaint. Persons engaging in reprisal for complaints will be subject to disciplinary action, including, without limitation, dismissal for cause.

Alternatively, the individual may file a complaint by using the Company's confidential reporting hotline. Refer to the Whistleblower Standard for further guidance on how to file an anonymous complaint.

9.0 Investigation

When a complaint has been received, an investigation will be undertaken by the corporate Human Resources department and individuals will be assigned to investigate the complaint. To uphold the impartial and confidential nature of the investigation process, the investigator(s) may include individuals from a location of the company other than where the victim or respondent is located, and/or external parties.

Persons receiving complaints will protect the confidentiality and privacy of persons involved in a complaint, subject to the requirements of a fair investigation and resolution process.

All documents related to a complaint, including the written complaint, witness statements, investigation notes and reports, and documents related to the complaint, will be securely maintained by the corporate Human Resources Department.

The investigator is responsible for ensuring a thorough, fair and impartial investigation of the allegations in the complaint. The investigator will interview the complainant, the respondent(s), and relevant witnesses suggested by the complainant or respondent(s), as well as gather documents relevant to the matters in the complaint. All employees, contractors and representatives are required to cooperate with the investigator.

The investigator will, wherever possible, complete the investigation within 90 days of receiving the assignment. At the conclusion of the investigation, the investigator will prepare a written report summarizing the allegations and the investigation results, and will forward the report to the Senior Vice-President, Human Resources.

Based on the findings in the investigator's report, the Senior Vice-President, Human Resources shall make a decision as to whether the standard has been violated.

If it is determined that the standard has been violated, the Senior Vice-President, Human Resources shall determine the appropriate consequences for person(s) who have been found to have violated the standard. These may include, without limitation:

- An apology
- Counselling
- Education and training
- Verbal or written reprimand
- Suspension with or without pay
- Transfer to another role or location
- Termination of employment

In determining the appropriate consequences, the Senior Vice-President, Human Resources shall take into account the nature of the violation of the standard, its severity, and whether the individual has previously violated the standard.

Where a violation of the standard is found, the Senior Vice-President, Human Resources shall also take reasonable steps to remedy the effects of the discrimination, harassment or violence on the complainant, and to prevent any further recurrences of harassment, discrimination or violence within the organization.

If, during the course of an investigation of an allegation of discrimination, harassment or violence under this standard, it is determined that the original accusation was unfounded and that it was made with the deliberate intent of bringing disrepute on the alleged perpetrator of the act of discrimination, harassment or violence, the raising of the complaint will be considered a form of harassment, and the complainant may be subject to disciplinary action, including, without limitation, termination for cause.