



CG005

Discrimination, Harassment & Violence in the Workplace Standard

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

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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 Director and HRBP, Corporate 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, ethnic origin, citizenship, colour, creed (religion), sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age, marital status, family status, disability, record of offenses, association or relationship with a person identified by one of the above grounds 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

The Company is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace (including customers, clients, other employers, supervisors, workers and members of the public, as applicable).

5.1 Definition

Workplace harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome and includes, workplace sexual harassment. 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;

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

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 favors
 - 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

The Company is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. We will take whatever steps are reasonable to protect our workers from violence in the workplace from all sources.

6.1 Definition

The Occupational Health and Safety Act (OHSA) defines workplace violence as the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. It also includes an:

- attempt to exercise physical force against a worker in a workplace, that could cause physical injury to the worker; and a
- statement or behaviour that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker [section 1 of the OHSA].

This may include:

- verbally threatening to attack a worker;
- leaving threatening notes at or sending threatening e-mails to a workplace;
- shaking a fist in a worker's face;
- wielding a weapon at work;
- hitting or trying to hit a worker;
- throwing an object at a worker;
- sexual violence against a worker;
- kicking an object the worker is standing on such as a ladder; or
- trying to run down a worker using a vehicle or equipment such as a forklift.

6.2 Workplace Violence Program

There is a workplace violence program that accompanies this standard. It includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance and a process for workers to report incidents, or raise concerns. Please see *Appendix I* for more details on the Workplace Violence Program.

The Company, as the employer, will ensure this standard and the supporting program are implemented and maintained. All workers and supervisors will receive appropriate information and instruction on the contents of the standard and program.

Supervisors will adhere to this standard and the supporting program. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this standard and the supporting program. All workers are encouraged to raise any concerns about violence in the workplace and to report any violent incidents or threats.

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.

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 Human Resources Business Partner.

8.0 Reporting Discrimination, Harassment and / or Violence in the Workplace

Any individual who feels that they are in immediate danger should contact security, or where necessary, contact emergency services.

If there is not an immediate threat to his or her wellbeing, any individual who feels discriminated, harassed and / or is subjected to violence in the workplace 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 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 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 Human Resources Business Partner. All complaints must be brought to the attention of the Vice President, Human Resources through the site HRBP to ensure proper investigation and resolution. If the employer (e.g., manager, director) is the person engaging in the workplace harassment, contact General Counsel, SVP, Business Development. (*Note:* The person designated as the reporting contact should not be under the direct control of the alleged harasser.)

9.0 Complaint Resolution

The complaint should be made in writing, or verbally, 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

Please refer to the *Workplace Harassment Complaint Form (Appendix II)*. When reporting verbally, the reporting contact, along with the worker complaining of harassment, will fill out the complaint form. 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.

Please note, an incident or complaint should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

10.0 Investigation

The Company will ensure that an investigation appropriate in the circumstances is conducted when the employer, Human Resources, a manager or supervisor becomes aware of an incident of workplace harassment, discrimination, and violence or receives a complaint of workplace harassment, discrimination and violence.

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.

The investigation must be completed in a timely manner and generally within 90 days or less unless there are extenuating circumstances (i.e., illness, complex investigation) warranting a longer investigation.

The person conducting the investigation whether internal or external to the workplace will, at minimum, complete the following:

- The investigator must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation.
- The investigator must thoroughly interview the worker who allegedly experienced the workplace harassment and the alleged harasser(s), if the alleged harasser is a worker of the employer. If the alleged harasser is not a worker, the investigator should make reasonable efforts to interview the alleged harasser.
- The alleged harasser(s) must be given the opportunity to respond to the specific allegations raised by the worker. In some circumstances, the worker who allegedly experienced the workplace harassment should be given a reasonable opportunity to reply.
- The investigator must interview any relevant witnesses employed by the employer who may be identified by either the worker who allegedly experienced the workplace harassment, the alleged harasser(s) or other sources as necessary to conduct a thorough investigation. The investigator must make reasonable efforts to interview any relevant witnesses who are not employed by the employer if there are any identified.
- The investigator must collect and review any relevant documents.

- The investigator must take appropriate notes and statements during interviews with the worker who allegedly experienced workplace harassment, the alleged harasser and any witnesses.
- The investigator must prepare a written report summarizing the steps taken during the investigation, the complaint, the allegations of the worker who allegedly experienced the workplace harassment, the response from the alleged harasser, the evidence of any witnesses, and the evidence gathered. The report must set out findings of fact and come to a conclusion about whether workplace harassment was found or not.

Within 10 days of the investigation being completed, the worker who allegedly experienced the workplace harassment, discrimination or violence and the alleged harasser, if he or she is a worker of the employer, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the employer to address workplace harassment.

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, discrimination, and violence, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is on-going, the worker who has allegedly experienced harassment, discrimination, and violence, the alleged harasser(s) and any witnesses should not to discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. Necessary accommodation for the worker who allegedly experienced harassment, discrimination, and violence, will be provided, in the interim, when the complaint is received, and during the investigation. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All records of the investigation will be kept confidential.

If it is determined that the standard has been violated, the 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
- Counseling
- 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 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 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.

The employer will keep records of the investigation including:

1. a copy of the complaint or details about the incident;
2. a record of the investigation including notes;
3. a copy of the investigation report (if any);
4. a summary of the results of the investigation that was provided to the worker who allegedly experienced the workplace harassment and the alleged harasser, if a worker of the employer;
5. a copy of any corrective action taken to address the complaint or incident of workplace harassment.

All records of the investigation will be kept confidential. The investigation documents, including this report should 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 one year.

Appendix I

Workplace Violence Program

An assessment of risks arising from the nature of the workplace, type and conditions of work must inform the development of the workplace violence program. The assessment must take circumstances specific to the workplace and common to similar workplaces into account. The risks must be reassessed as often as is necessary to ensure the related standard and program continue to protect workers.

Required Element: Measures and procedures to control the risks of workplace violence identified in the risk assessment as likely to expose a worker to physical injury.

Measures and procedures may include:

- safe work procedures;
- personal protective equipment;
- design or physical layout of the workplace such as doors with clear windows, adequate lighting, location and structure of counters, barriers, etc.;
- emergency procedures that would be relevant to violent or potentially violent incidents, such as designated safe locations for emergency situations or lockdown procedures;
- procedures for informing workers of a person with a history of violence, as appropriate in the circumstances, or potentially violent situations;
- worker training on the measures, procedures and processes set out in the workplace violence standard and program;
- worker training on managing a person who may become aggressive or violent.

Required Element: Measures and procedures for summoning immediate assistance when workplace violence occurs or is likely to occur.

Measures and procedures may include:

- equipment to summon assistance such as fixed or personal alarms, locator or tracking systems, phones, cell phones, etc.;
- positioning workers within calling distance of each other;
- emergency telephone numbers and/or e-mail addresses.

Additional Workplace Violence Program Elements

In addition to the mandatory elements above, a workplace violence program could also include information to support compliance with requirements in the OHSWA, such as:

- measures and procedures for assessing risks of workplace violence;
- procedures for reviewing the workplace violence standard and maintaining the workplace violence program;
- training plans.

A program could also include additional measures, procedures and processes, depending on the circumstances of a particular workplace.

For example, a program could include:

- posting of a “code of conduct” for anyone in the workplace, setting out expectations on behaviour in the workplace and consequences of violating those expectations;
- information about an Employee Assistance Program (EAP) or a peer helper program and their role in workplace violence situations;
- post-traumatic stress prevention and response procedures;
- domestic or sexual violence response and support plans;
- workplace violence awareness training;
- regular monitoring of the workplace for violence issues.

Appendix II

Workplace Harassment Complaint Form

Name and contact information of worker who has allegedly experienced workplace harassment:

Name of alleged harasser(s) and contact information, if available:

Details of the complaint of workplace harassment:

Please describe in as much detail as possible the bullying and harassment incident(s), including: (a) the names of the parties involved; (b) any witnesses to the incident(s); (c) the location, date and time of the incident(s); (d) details about the incident(s) (behaviour and/or words used); (e) any additional details. (Attach additional pages if required)

Relevant documents/evidence:

Attach any supporting documents, such as emails, handwritten notes, or photographs. Physical evidence, such as vandalized personal belongings, can also be submitted. If you are not able to attach documents and they are relevant to your complaint, please list the documents below. If someone else has relevant documents, please note that below.

Signature:

Date:

Appendix III

Investigation Form

Name of investigator:

Date of investigation:

A. Background Information

Who are the people involved? Are they workers as defined by Occupational Health and Safety Act (OHSA)? Who reported and when?

1. Name of person who reported workplace harassment
2. If not the same person as above, name of person who allegedly experienced workplace harassment
3. Date complaint/concern raised and how
4. Name of worker(s) (complaining or possibly exposed to workplace harassment):
Position/Department
5. Name of respondent(s) (alleged harasser); Position/ Department
If not a worker – provide details

B. Investigation Plan

Plan and conduct the investigation:

1. Obtain the worker(s) concerns of harassment in writing, if possible. Assistance should be provided in completing the form where necessary.
2. An investigator needs to interview the worker who allegedly experienced workplace harassment and the alleged harasser (if a worker of the employer). If the alleged harasser is not a worker of the employer, the investigator should make reasonable efforts interview him or her.
3. Make a list of possible relevant witnesses. The worker who allegedly experienced workplace harassment and the alleged harasser should be asked for names of any relevant witnesses.
4. Interview relevant witnesses. Ask specific questions about what they have observed, are aware of or have personally experienced. If the witnesses are not workers of the employer, the investigator should make reasonable efforts to interview those witnesses.
5. Collect and review relevant documents from the worker, alleged harasser, witnesses and the employer.
6. Take detailed notes.

7. Keep the investigation confidential. Instruct the worker who allegedly experienced workplace harassment, the alleged harasser and witnesses not to talk to others about the investigation unless it is necessary, for instance, to obtain advice or counseling.

C. Worker(s) Concerns/Workplace Harassment Allegations

When did the incident(s) occur? Confirm date of first incident and any subsequent behaviours or conduct. Note that recalling events of harassment can be stressful for the complainant.

Date of first incident:

Date of last incident:

Date of other incident(s):

D. Alleged Harasser(s) Response

The alleged harasser(s) will likely need details of the allegation of harassment to be able to respond.

E. Interview Relevant Witnesses

List witnesses. Interview relevant witnesses and make notes.

F. Collected documentation

List the documents collected for the investigation and how or from whom they were obtained.

G. Investigation Result(s)

The investigator's summary report should set out who was interviewed, what evidence was obtained and an analysis of the evidence to determine whether workplace harassment occurred.

Summary of key evidence:

Recommended next steps:

Report provided to: