



1) OBJECTIVES

The purpose of this policy is to affirm Signal Space Lab's commitment to preventing and putting a stop to any situation of psychological or sexual harassment within its company, including any form of discriminatory harassment. It is also intended to establish the principles of intervention applied in the company when a complaint of harassment is filed, or a situation of harassment is reported to the employer or his representative.

2) SCOPE

This policy applies to all employees of the company, at all levels of the hierarchy, in the following places and contexts:

- Workplaces, including telecommuting locations where applicable;
- any other place where individuals are likely to be in the course of their employment (e.g., common areas on the employer's premises, during meetings, training, travel or social activities organized by the employer);

This policy also covers communications transmitted or received by any means, technological or otherwise, in a work context.

3) DEFINITION

The Act respecting labour standards defines psychological harassment as follows[1] :

"vexatious behaviour manifested either by repeated behaviour, words, acts or gestures, which are hostile or unwanted, which affects the dignity or the psychological or physical integrity of the employee and which results, for the employee, in a harmful work environment. For greater clarity, psychological harassment includes such conduct when it manifests itself through such words, acts or gestures of a sexual nature.

A single serious conduct may also constitute psychological harassment if it causes such harm and produces a continuing harmful effect on the employee."

The definition includes discriminatory harassment related to one of the grounds provided for in the Charter of Human Rights and Freedoms[2].

The notion of harassment must be distinguished from other situations such as interpersonal conflict, work-related stress, difficult work constraints or the normal exercise of management rights (management of work attendance, work organization, disciplinary measures, etc.).

4) POLICY STATEMENT

Signal Space Lab does not tolerate or condone any form of psychological or sexual harassment within its company, whether it be :

- by managers towards employees
- between colleagues;
- by employees towards their superiors;
- by any person associated with it: representative, client, user, supplier, visitor or other.

Any behaviour related to harassment may result in disciplinary measures, up to and including dismissal.

Signal Space Lab is committed to taking reasonable steps to :

- provide a work environment free of all forms of harassment in order to protect the dignity and the psychological and physical integrity of individuals;
- disseminate the policy in such a way as to make it accessible to all of its employees: signalspacelab.com/anti-harrasment-policyENG
- prevent or, as the case may be, put an end to harassment situations by :
 - (a) implementing a procedure for handling complaints and reports related to situations of psychological or sexual harassment
 - b) ensuring that the policy is understood and respected by all persons
 - (c) promoting respect among individuals,

5) EXPECTATIONS OF STAFF

It is the responsibility of all staff to behave in a manner that promotes a workplace free of psychological or sexual harassment.

6) HANDLING COMPLAINTS AND REPORTS

Whenever possible, a person who believes that he or she is being psychologically or sexually harassed should first inform the person concerned that the behaviour is unwelcome and that the person must stop it. They should also note the date and details of the incidents and the steps they have taken to try to resolve the situation.

If this initial intervention is not desired or if the harassment continues, the employee should report the situation to one of the responsible persons designated by the employer in order to identify the problematic behaviour and the means required.

A complaint may be made verbally or in writing. The behaviours complained of and the details of the incidents should be described as accurately as possible so that action can be taken quickly to stop the situation.

The responsible persons designated by the employer are as follows:

[Jose Aguirre], [Managing Director]

jose@signalspace.ca

[514-885-3120]

[Stacey Shulak], [HR Consultant]

shulak.stacey@gmail.com

[514-967-8712]

The person who witnesses a situation of harassment is also invited to report it to one of the responsible persons mentioned above.

7) PRINCIPLES OF INTERVENTION

Signal Space Lab undertakes to:

- deal with the complaint or report as quickly as possible;
- preserve the dignity and privacy of the persons involved, i.e. the person who made the complaint, the person who is the subject of the complaint and the witnesses;
- ensure that all persons involved are treated humanely, fairly and objectively and that appropriate support is provided
- Protect the confidentiality of the response process, including information related to the complaint or report;
- Offer to meet with the individual, with their consent, to resolve the situation;

- Conduct a prompt and objective investigation, if necessary, or assign responsibility to an outside party. The persons concerned will be informed of the outcome of this process. If the investigation does not establish that unacceptable behaviour has occurred, all physical evidence will be retained for two years and destroyed thereafter
- take all reasonable steps to resolve the situation, including appropriate disciplinary action.

Any person who violates the harassment policy will be subject to appropriate disciplinary action. The determination of the appropriate action will take into account the severity and consequences of the action(s) and the past record of the person who committed the action(s).

A person who makes false accusations with the intent to harm is also subject to appropriate disciplinary action.

In handling and resolving a situation involving workplace harassment, no one shall be harmed or retaliated against by the employer.

DocuSigned by:

6215939137BE49E
Employer's Signature
Jose Aguirre

1/24/2023

Date

A non-unionized person who believes that he or she is being or has been subjected to psychological or sexual harassment in connection with his or her work may also file a complaint at any time directly with the Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST). The maximum time limit for doing so is two (2) years from the last manifestation of harassment. The complaint may be filed online or by telephone at 1 844 838 0808. The choice of an employee to first address his or her employer will not prevent him or her from also filing a complaint with the CNESST.

APPENDIX 1 - RECOGNIZING PSYCHOLOGICAL OR SEXUAL HARASSMENT

The Act respecting labour standards provides criteria for determining what may be considered psychological or sexual harassment, namely

- vexatious (hurtful, humiliating) conduct
- that occurs repeatedly or in a single serious act
- in a hostile (aggressive, threatening) or unwanted manner
- that affects the dignity or integrity of the person
- resulting in a harmful (noxious, injurious) work environment for the individual.

These conditions include words, acts or gestures of a sexual nature.

Discrimination based on any of the grounds listed in section 10 of the Charter of Human Rights and Freedoms may also constitute harassment: race, color, sex, pregnancy, sexual orientation, marital status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, handicap or the use of any means to palliate such handicap.

This definition applies to all work settings, including telecommuting.

For example, the following behaviors could be considered vexatious conduct constituting harassment if they meet all the criteria of the definition set forth in the law.

Behaviours that may be linked to psychological harassment

- Bullying and cyberbullying;
- Threats, isolation;
- Offensive or defamatory comments or gestures about a person or their work;
- Verbal abuse;
- Denigration.

Behaviors that may be related to sexual harassment

- Any form of unwanted attention or advances with sexual overtones, such as:
insistent solicitation,
stares, physical contact,
sexist insults, foul language;
Sexual comments, jokes or images.

APPENDIX 2 - RESPONSIBLE PERSONS DESIGNATED BY THE EMPLOYER

Signal Space Lab

- ensure that the designated responsible persons are properly trained and have the necessary tools at their disposal for the handling and follow-up of the complaint or report;
- make time available for the designated responsible persons to perform their assigned duties.

The following persons are designated to act as persons responsible for the application of the Policy for the Prevention of Psychological or Sexual Harassment in the Workplace and the Handling of Complaints of Signal Space Lab:

[Jose Aguirre], [Managing Director]

jose@signalspace.ca

[514-885-3120]

[Stacey Shulak], [HR Consultant]

shulak.stacey@gmail.com


[514-967-8712]

These responsible persons must primarily:

- inform staff about the company's policy on psychological or sexual harassment
- intervene informally to try to resolve situations
- receive complaints and reports
- make recommendations on the nature of the actions to be taken to stop harassment.

Commitment of Persons in Charge

I hereby declare my commitment to respect this policy and assure that my intervention will be impartial, respectful and confidential.

DocuSigned by:

6245939137B5E19E

Signature of responsible person #1

1/24/2023

Date

DocuSigned by:

26DF26F4652D452

Signature of responsible person #2

1/24/2023

Date

Employee

Date