

## Employment Practices

### Commitment to Human Rights

It is the policy of Sterno Home to conduct our relations with employees and applicants for employment in accordance with the Federal and Provincial laws without regard to race, colour, ancestry, place of origin, religion (including religious dress or grooming practices), marital status, family status, physical or mental disabilities, sex or gender (including gender identity and gender expression), sexual orientation, pregnancy (including child birth, breastfeeding or related medical conditions), age, criminal conviction, political beliefs, or any other characteristic protected by applicable Federal or Provincial law prohibiting harassment, discrimination, or retaliation. These laws may vary from Province to Province.

This policy applies to all employment terms and conditions including hiring, compensation decisions, benefits, discipline, training, promotions, transfers, layoffs, and terminations. Job aptitude, ability and other job-related tests may be given to help determine a person's qualifications and abilities to perform a specific job.

An employee with questions or concerns about any type of discrimination in the workplace should bring these issues to the attention of his or her Supervisor, the Department Head, Human Resources, or any member of senior management, including the General Manager of the Company. Employees can raise concerns, report problems, or make complaints without fear of reprisal, disciplinary action and up to and including termination of employment.

### Policy Against Harassment

Sterno Home is committed to maintaining a work environment that is free of unlawful harassment based on any of the classifications protected by applicable federal and provincial legislation. In keeping with this commitment, we will not tolerate harassment of employees by anyone, including any manager, supervisor, co-worker, customer, independent contractor, supplier, vendor, or visitor. Similarly, any such harassment of persons seeking employment with the Company, or harassment of our customers, independent contractors, suppliers, vendors, visitors or anyone else who conducts, attempts to conduct or is solicited for business with the Company will not be tolerated.

Harassment is any unwelcome or unwanted speech, action or conduct that is offensive or abusive *based upon an individual's race, colour, ancestry, place of origin, religion (including religious dress or grooming practices), marital status, family status, physical or mental disabilities, sex or gender (including gender identity and gender expression), sexual orientation, pregnancy (including child birth, breastfeeding or related medical conditions), age, criminal conviction, political beliefs, or any other characteristic protected by applicable Federal or Provincial law prohibiting unlawful harassment, discrimination, or retaliation*

Examples of prohibited harassment include derogatory remarks or slurs; negative stereotyping or off-colour jokes or comments; circulation of offensive written or graphic materials, jokes, cartoons, pictures, e-mails, texting, instant messaging or computer transmissions; and gestures that demean, intimidate, ridicule, torment, or show hostility toward an individual because of his or her protected personal characteristics. The Company will not tolerate harassing behavior that affects tangible job benefits, that interferes with an individual's job performance, or that creates an intimidating, hostile, or offensive working environment for employees, visitors or anyone conducting business with the Company.

Sexual harassment is one specifically prohibited type of harassment. Unwelcome or unwanted sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on sex constitute sexual harassment.

Other examples of possible sexual harassment include unwelcome sexual propositions, advances, favors, demands, threats, or assaults; sexual favoritism; unwelcome sexual innuendoes, suggestive comments, or excessive flattery; unwelcome questioning of a personal nature such as sexual remarks

about a person's physical appearance or dress; unwelcome discussion of one's sexual experiences, desires, etc.; repeated requests for dates; sexually oriented "kidding", "teasing" or "practical jokes"; offensive or obscene language or gestures; leering or staring; whistling or hooting; offensive, obscene or sexually suggestive or explicit printed materials, pictures, posters, cartoons, graffiti, calendars, e-mails, texting, instant messaging, or computer transmissions (e.g., inappropriate screen savers or transmitting or displaying sexually provocative pictures or text); and inappropriate physical contact or touching of a sexual nature (e.g., brushing, patting, hugging, pinching or shoulder rubs).

## Complaint Procedure

All employees are responsible for helping to assure the Sterno Home workplace is free from prohibited discrimination or harassment. An employee who has experienced or witnessed harassment or discrimination should immediately report the situation by providing the facts and other details of the incident(s), names of the individuals involved, and any witnesses to his or her Supervisor, the Department Head, Human Resources, or any member of senior management, including the General Manager of the Company. These are the individuals who are authorized by this policy to receive and act upon reports or complaints of harassment or discrimination on behalf of the Company. This policy does not require reporting harassment to any supervisor or manager who may be creating the harassment.

Delay or failure to report harassment hurts both the Company and the alleged victim. If no report of harassment is made, the Company will be unable to undertake a prompt investigation and take appropriate remedial action when harassment has occurred. *In addition, if no report of harassment is made or filed by the employee to Human Resources or to Management, then it will be presumed that the conduct was not unwelcome or offensive.* Any supervisor or manager who becomes aware of alleged incidents of harassment or discrimination is to immediately report such incidents or refer any complaints to Human Resources or the CFO & Vice President of Administration. Retaliation against any employee for reporting a problem, filing a complaint, bringing inappropriate conduct to the Company's attention, or participating in an investigation or proceeding is strictly prohibited.

All of us must recognize that harassment, discrimination and retaliation not only violate the rules of common courtesy and are a violation of the Company's policy, but also are illegal under federal and provincial employment discrimination laws. It is our policy to investigate all reports or complaints of harassment or discrimination thoroughly, promptly, and discreetly. To the extent possible, the confidentiality of an employee or any other person who has reported a problem and that of any witnesses and the alleged offending party will be protected against unnecessary disclosure, but some disclosure will be necessary in order to conduct an investigation and take corrective action. The outcome of the investigation and a timely resolution of each complaint will be reached and communicated to the employee and the other parties involved. If an investigation confirms that harassment or discrimination has occurred, the Company will take appropriate corrective action, up to and including termination.