



WORKPLACE BULLYING, HARASSMENT AND VIOLENCE POLICY (THE “POLICY”)

1. Policy statement

The management of Boralex Inc. (“**Boralex**”) is firmly committed to not tolerating any form of violence, bullying or harassment in order to ensure everyone enjoys a respectful and safe workplace, free of any verbal, physical, psychological or sexual threat.

Boralex is committed to taking all reasonable steps to ensure employees are treated with respect, to promote their physical and psychological well-being and to implement corrective measures as required. Boralex is committed to eliminating or, if that is not reasonably practicable, controlling the hazards of bullying, harassment and violence.

2. Objectives

This Policy ensures that employees at Boralex have a work environment that is free of bullying, violence or harassment of any kind. Boralex is determined to counter bullying, harassment and violence by encouraging the respect of human dignity in working relationships.

This Policy defines Boralex’s expectations and the measures to take in the workplace to prevent or, if necessary, correct situations of bullying, harassment and violence, to sensitize and inform employees in order to prevent harassing or violent behaviour and to provide the support required, through assistance mechanisms and an internal complaint procedure for those who believe they are the subject of bullying, harassment or violence.

3. Scope

This Policy applies to all Boralex employees, regardless of the nature of the relationship between the person who adopts a violent or harassing behaviour and the victim, whether at work or during any other activity related to work. This Policy also applies to dealings between employees and third parties.

4. Legal framework of application

The present Policy was drafted to comply with applicable state, provincial and federal laws, as applicable.

5. Definition of bullying and harassment, its characteristics and its manifestations

Bullying and Harassment

Bullying and Harassment is vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee’s dignity or psychological or physical integrity and that results in a harmful work environment for the employee. For greater certainty, psychological harassment includes such behaviour in the form of such verbal comments, actions or gestures of a sexual nature. Workplace harassment also means making a sexual solicitation or advance where the person making the solicitation or

advance is in a position to 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.

Generally, harassment means repeated acts. However, a single serious act of objectionable or unwelcome conduct, comment, bullying or action that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker, or adversely affects the worker's health and safety can also be harassment. It includes conduct, comment, bullying or action because of race, religious belief, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression, sexual orientation and any other protected ground under applicable human rights legislation. In some provinces, the single serious incidence of such behaviour must have a lasting harmful effect on an employee to constitute psychological harassment.

The normal exercise of the Boralex's management rights must not be confused with psychological harassment, notably, the right to assign duties or impose disciplinary measures as well as any organizational change, disagreements, character traits (e.g., mood swings), heated discussion or negative performance evaluation, in as much as the employer does not exercise his rights in an abusive manner.

6. Definition of Workplace Violence

Workplace violence means the exercise or attempt of physical force by a person against a worker in a workplace that causes or could cause physical or psychological injury to the worker, or a threat to exercise physical force against the worker, in a workplace, that could cause physical or psychological injury to the worker. Workplace violence includes threatening behaviour (such as shaking fists, destroying property or throwing objects), verbal or written threats, verbal abuse and physical attacks.

7. Undertakings and responsibilities

Boralex is responsible for the application of this Policy and requires its managers, supervisors and employees to apply it. Situations of violence and harassment in the workplace are treated with impartiality, equity and confidentiality, and complainants, whistleblowers and witnesses must not be subject to prejudice or reprisals. We expect that all employees will participate in awareness-building activities and prevention of situations of violence and harassment.

If the circumstances lend themselves to it, employees who believe themselves to be a victim of harassment should make their disapproval clear to the presumed harasser and ask them to put an end to their behaviour. If the situation is not resolved or it is not desirable to confront the presumed harasser, the employee must notify their supervisor or Human Resources manager as soon as practically possible and file a complaint, if necessary.

Employees who experience or witness an incident of violence must report the incident to Human Resources immediately. Employees may also obtain immediate assistance by calling 9-1-1 or the Local Security team, where applicable, for assistance. Boralex will contact appropriate authorities and/or agencies to report a serious incident, injury or fatality at the workplace.

8. Assistance for the complainant and the complaints procedure

A person who believes they are a victim of violence or harassment in the workplace can report it to the appropriate resource in order to seek solutions to the problem. To this end, you may contact

your Human Resources representative. If your Human Resources representative is the person engaging in the workplace harassment or violence, contact the VP, Chief Legal Officer . This person will receive and accompany the complainant until the problem is resolved or an official complaint is filed.

If the incident or complaint involves senior executive, management or board members or for any other circumstances that warrant it, an external person qualified to conduct a workplace investigation will be retained to conduct the investigation.

To this end, the contact person must:

- Act in an impartial manner, with diligence and in the greatest confidentiality
- Receive and accompany the complainant
- Analyze the situation in order to properly identify the nature of the problem encountered
- Offer support to the complainant in drafting a formal written complaint and provide assistance in expressing their version of the facts, if necessary
- Inform the complainant of the support measures available (EAP, CLSC, etc.)
- Meet the person presumed to be violent or harassing in order to inform them of the situation and provide them with assistance to write their version of the facts, if necessary
- Offer the persons concerned possible solutions (alternative means of mediation or problem solving, etc.)
- Take note of the overall elements of the reported situation of harassment or violence
- Ensure accompaniment and support to the complainant
- Supply all relevant information to the complainant, particularly with respect to applying the Policy, and on the stages of a formal complaint

No employee will be subject to any form of retaliation or discipline for pursuing in good faith a harassment or discrimination complaint or for participating in the investigation of any such complaint.

9. Procedures and recourse mechanism

A person who believes they are a victim of bullying, harassment or violence may file a complaint or engage in recourse without prejudice or fear of reprisal. An employee who believes they are the subject of bullying, harassment or violence in the workplace must contact their Human Resources representative (or other alternate reporting contact) and formulate a complaint. The complaint must be in writing. It is signed by the person who files the complaint and authorizes its disclosure to the person who is the subject of the complaint. The complaint should include details of the incident, the names of the employees and others involved in or witness to the incident, and the date(s) of the incident. Any complaint relative to a charge of harassment or violence must be reported as promptly as reasonably practical.

Boralex will investigate any incident of bullying, harassment or violence and take corrective action to address the incidents. The Human Resources representative must deal with the complaint within a reasonable delay and, as much as possible, immediately. The investigation may include the following:

- (i) informing the respondent of the complaint and allegations made against them and provide them with an opportunity to respond;
- (ii) interviewing the complainant, respondent, any witnesses as appropriate and any person involved in the incident or with knowledge of the incident or any other similar incident;
- (iii) collecting and reviewing any relevant documents or other evidence; and
- (iv) preparing a written report. This report is confidential, in some cases may be privileged, and will not be released during or after the investigation, unless required by law or as part of a court, tribunal, administrative or other regulatory proceeding.

Following the investigation, Boralex will take corrective action as appropriate in the circumstances, which may include the following

- (i) dismissal of the complaint, if it is found to be without merit or unsubstantiated
- (ii) disciplinary action up to and including termination of employment for cause;
- (iii) such other remedial or legal action as the circumstances warrant (e.g. transfer to another department or unpaid suspension).

Following the investigation, Boralex will inform the individuals involved in the incident of harassment or violence, of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation in writing.

All information relating to the complaint as well as the identity of the persons involved are treated confidentially by all parties concerned, unless the information is necessary for the investigation, the handling of the complaint or the imposition of administrative or disciplinary measures. Boralex will not disclose the circumstances related to an incident of harassment or violence, or the names of the complainant, the person alleged to have committed the harassment or violence, and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident, (ii) where necessary to inform workers of a specific or general threat of violence or potential violence, or (iii) as required by law. Boralex will disclose only the minimum amount of personal information that is necessary to inform workers of a specific or general threat of violence or potential violence.

No information is entered into the personnel file of the person who is believed to be the subject of harassment. In the case of the person accused of harassment, information will only be entered into their file if an administrative or disciplinary decision is taken.

Employees who have suffered an injury or adverse symptom as a result of an incident of bullying, harassment or violence are advised to consult a health professional of their choice or access the services of the company-provided employee and family assistance program.

Nothing in this Policy is intended to discourage an employee from exercising the employee's rights under any other law, including applicable human rights legislation.

10. Assessment and control of risks

In support of this Policy, Boralex has put in place workplace harassment and violence prevention procedures to protect employees from workplace bullying, harassment, and violence. Appropriate measures will be implemented to address reported hazards. Where hazards are identified, Boralex will take measures to control the hazards. These measures may include, but are not limited to:

- creating procedures to ensure safe work;
- communicating information about the nature and extent of the hazards;
- designing emergency procedures that would be relevant to incidents of harassment or violence.

All employees are required to read and sign off on the company's WORKPLACE BULLYING, HARASSMENT AND VIOLENCE POLICY.

Signed or Approved by:

Date:

ACKNOWLEDGMENT

I, _____, confirm having received a copy of the *Workplace Bullying, Harassment and Violence Policy* (the "Policy"), having read it and understanding it. I confirm that I will abide by this Policy and that if I have any questions about this Policy or its application, I can contact the Human Resources department.

Je confirme avoir requis que la Politique sur l'intimidation, le harcèlement et la violence au travail me soit remise dans la langue anglaise. I confirm having requested that the Policy be given to me in the English language.

NAME

DATE