



Airswift
HSE Management System
Workplace Violence Policy Statement

Important Notice:

1. This procedure is a Controlled Document and shall not be amended without the authority of the Operations Manager – North America.
2. Any queries or feedback concerning the contents of this Procedure should be addressed to the Operations Manager – North America.
3. This procedure is reviewed annually or when there is a change to business practices.
4. This document should be retained indefinitely and only removed should the procedure become obsolete.

Prepared		Reviewed		Approved		Effective Date	Issue Number
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Version Number	Effective Date	Author		Amendments		Reason for Amendments	
1	12/01/2017	Julia Arevalo				Update	
2	05/10/2018	Carol Stallworth		Regulatory review		Update	
3	12/01/2021	Carol Stallworth		Regulatory review		Review	
4	07/11/2022	Kellie Tetley		Update Contraband		Update Contraband	
5	03.08.2023	Kellie Tetley		Confidentiality/Eme rgency #		Bring up to Alberta legislation	

INTRODUCTION:

Airswift is committed to eliminating harassment and violence in the workplace and to providing a respectful, inclusive, and psychologically safe work environment that promotes social well-being. To best protect our employees, contractors, customers, business partners, and persons visiting our work sites, Airswift has enacted this Respectful Workplace and Violence Prevention Policy (the “Policy”).

All Airswift employees, contractors, customers, business partners and other stakeholders are expected to conduct themselves professionally - with honesty and integrity and to always treat others with dignity and respect. Airswift encourages those who are subject to or witness to disrespectful, harassing, or violent behavior to speak up and report behavior of Workplace Harassment or Workplace Violence. Violence or threats of violence have no place in business. Violence is not an effective solution to any problem. The management of Airswift recognizes the potential for workplace violence, harassment and other aggressive behavior directed at our employees.

This Policy applies to all workers employed or engaged by Airswift and its subsidiaries and affiliates. For ease of reference, for the purpose of this Policy “worker” shall include all employees, consultants, contractors, subcontractors, and agents of Airswift. References to “employee” is solely a reference to an Airswift employee and not a contractor or its employees or agents.

This policy is not intended to discourage a worker from exercising their rights to report any form of workplace violence or harassment in the workplace.

PROMOTING A PSYCHOLOGICALLY SAFE WORKPLACE

Through Airswift’s values, we promote a psychologically safe workplace which enables everyone to bring their best selves to work. A psychologically safe workplace is one where everyone feels included, safe to learn, contribute, ask questions, and to challenge the status quo – all without fear of being embarrassed, marginalized, or punished in some way. To ensure everyone is free from psychological and/or physical injury and harm, Airswift is committed to addressing all forms of Workplace Harassment and Workplace Violence. While this Policy outlines the definitions of Workplace Harassment and Workplace Violence, it is impossible to address every possible form of conduct which is prohibited in this Policy. As such, this Policy will be interpreted with the goal of promoting a psychologically safe workplace.

VIOLENCE, whether at a work site or work-related, means the threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm, and includes domestic or sexual violence.

Some specific examples of inappropriate conduct that constitute Workplace Violence that will not be tolerated at Airswift include, but are not limited to:

- written or verbal threats or explicit statements (e.g., verbally threatening to attack a worker, or sending threatening emails to express an intent to inflict harm).
- threatening behavior (e.g., shaking a fist in a person's face, wielding a weapon at work, trying to strike a person).
- physical or sexual assault, attack, or aggression (e.g., hitting, shoving, pushing, striking, slapping, kicking, or throwing an object at a person)
- body language which suggests the perpetrator is hostile toward a worker or intends harm.
- surveillance of, stalking or following an individual.
- use of profane or abusive language, aggressive horseplay
- unprovoked unreasonable conflict or anger toward coworkers.

CONTRABAND To the extent permitted by state and local laws, workers are strictly prohibited from bringing any weapons, including knives, pistols, rifles, ammunition, explosives, stun guns, mace etc., on Airswift or Client premises or worksites including buildings and facilities.

Harassment means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person 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, and includes: (a) conduct, comment, bullying or action because of race, religious beliefs, color, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and (b) a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of workers or a work site.

Airswift are committed to providing our workers with an appropriate level of protection from the hazards associated with workplace violence and harassment. Neither threats of violence nor fighting will be tolerated. Furthermore, if you have a problem that is creating stress or otherwise making you agitated, you are encouraged to discuss it with your Supervisor/Service Advisor.

Management Responsibilities:

- Inform workers if, to management's knowledge, the workers will be in an area where there is a potential for violence and identify any risks that are specific to that area.
- Ensure that appropriate procedures are in place to minimize the risk to our workers from violence by providing background checks on all employees. Ensure all workers are also aware of our security procedures, restricted access to work areas, locked doors, keycards, security cameras, alarms, emergency response procedures and working alone procedures.
- Ensure that employees are trained in recognizing and responding to situations involving workplace violence and the contents of this policy. Workplace violence and harassment will be provided at the time of onboarding and annually thereafter. Workers placed at a client site location will be trained by the

client on the requirements of their workplace violence and harassment policy along with their Emergency Response procedures.

- Ensure that every reported incident of workplace violence is investigated, and potential areas for improvement are identified and appropriate control measures are implemented. Employers must ensure that any worker reporting an injury or adverse symptom resulting from an incident of violence or harassment is advised to consult a health care professional of their choice for treatment or referral.
- Airswift takes all complaints seriously and handles all complaints as promptly, thoroughly, and confidentially as possible. Airswift will clearly inform the worker of his or her rights to assistance and how to preserve and protect these rights.
- Ensure the workplace violence policy must be reviewed at the earliest opportunity of the following (a) when an incident of violence and or harassment occurs; (b) if the work site health and safety representatives recommend a review; (c) every 3 years.

Employee Responsibilities:

- Employees are required to be familiar with and follow the procedures that are in place to protect them from workplace violence.
- All employees must participate in the training of workplace violence and harassment prevention.
- Employees are also responsible for participating in work site hazard assessments and implementing controls and procedures to eliminate or control the associated hazards.
- Employees are required to immediately report all incidents of workplace violence to their supervisor or alternate (i.e., manager, foreman, security).

No worker will be penalized, reprimanded or in any way criticized when acting in good faith while following the procedures for addressing situations involving workplace violence or harassment.

PROCEDURE TO REPORT AN INCIDENT OF WORKPLACE VIOLENCE OR HARASSMENT:

Immediate Assistance:

All workers have a duty to maintain a workplace free from Workplace Violence. In situations of Workplace Violence, PARAMOUNT OVER THE DUTY TO REPORT, first consider your own safety, and immediately remove yourself from the situation and report the incident.

- **Immediate threat of violence; all workers are required to call 9-1-1 and, or security for immediate assistance.** The number for the building management security will be provided in a breakroom or other visible area. Emergency Contact numbers will be detailed on the Airswift and client site Emergency Response procedure.

- Potential violence: all workers are required to notify their immediate supervisor or alternate (i.e., manager, foreman, security)

Harassment:

Airswift internal employees are required to report any form of harassment to either their immediate supervisor, manager and or HR. If the matter requires anonymity, matters can be reported to confidential@airswift.com or by calling +44 (0) 800 260 6717 to contact the Airswift business Ethics Officer.

Any worker who believes that he or she is a victim of any type of harassment, including sexual harassment, should immediately report such actions to their Service Consultant, Account Manager, Airswift and or their Airswift point of contact.

If an employee's Service Consultant, and or Account Manager is involved in the alleged harassment, it is unnecessary to make a report to that individual. In this case, a report can be made to the Airswift HR department by emailing hr@airswift.com where contact will be made to investigate the harassment further.

Workers are encouraged to promptly report the alleged harassment within three calendar days of the offense. It is not necessary to file a formal complaint or grievance to complain of sexual harassment.

Airswift workers working at a client site will be required to follow the client site policy for reporting immediate threat workplace violence or harassment. Once the threat or imminent danger is contained contractors shall also be required to report the incident by following the incident reporting policy, outlined on the safety wallet card by either calling the safety cellphone and or scanning the QR code to complete the incident investigation form. Once the incident investigation form has been completed email the form to safety@airswift.com where safety, and or HR will be in contact to complete the investigation.

INVESTIGATION PROCESS:

Commitment to Investigate Workplace Harassment and Workplace Violence and all matters of Workplace Harassment and Workplace Violence will be taken seriously and dealt with in a timely manner. An investigation appropriate in the situation will be conducted when Airswift becomes aware of an allegation or receives a complaint of Workplace Harassment or Violence. In consultation with the HR Policies & Programs Manager, Ethics and Compliance, and the Legal Department, an impartial investigator will be selected to conduct an investigation into the situation. Depending on the situation, an external person qualified to conduct a workplace investigation may be assigned. If necessary, Airswift may also engage the assistance of external legal counsel, health and safety consultants, human resource consultants, the police, or other subject matter experts. Where appropriate, the alleged respondent's immediate Leader will be advised of the investigation.

The individuals conducting the investigation whether internal or external to the workplace will:

1. Ensure the investigation is kept confidential and remind all parties involved of this obligation.
2. Ensure that participants in the investigation sign a confidentiality agreement.
3. Inform the respondent of the complaint and provide the respondent with the nature of the allegations raised in the complaint.

4. Provide the respondent with the opportunity to respond in writing.
5. Provide the complainant with the nature of the respondent's reply.
6. Conduct interviews with: a. Complainant(s) – person(s) who filed the complaint b. Respondent(s) - named individual(s) who have been accused of violating this Policy c. Witnesses and other relevant parties

Note: if any of the above parties are not current employees of Airswift, the investigator will make reasonable efforts to interview all individuals

All investigations regarding any form of workplace violence or harassment will be completed and reviewed by management where any corrective actions will be assigned. All parties concerned will be provided with a copy of the completed investigation including corrective actions.

POLICY VIOLATIONS:

If through an investigation it is found there is a Policy violation, depending on the severity of the violation, corrective action will be taken, up to and including termination of employment or engagement without notice or payment in lieu of notice. The appropriate corrective action in a particular case depends on the nature of the Policy violation and the circumstances surrounding the situation. Some potential disciplinary actions for employees may include referral for training, referral for counselling/coaching, written or verbal warning, suspension, reassignment, demotion, termination of employment without notice or payment in lieu of notice. The incident and outcome will be documented and placed on the employee's file.

FALSE ALLEGATIONS:

Determining whether a particular action or incident occurred and/or constitutes a violation of this Policy will depend on an evaluation of all the facts, surrounding circumstances and applicable legal principles. Workers who report an event truthfully and in good faith, will not be subject to negative consequences, even if the complaint is determined to be unfounded. Intentionally making a false complaint or knowingly giving false information during the course of an investigation or other proceedings under this Policy is itself a violation of this Policy and may be a basis for disciplinary action, up to and including termination of employment without notice or payment in lieu.

RETALIATION IS PROHIBITED:

Retaliation is any act or negative consequence that occurs because someone in good faith makes a report or brings a complaint under this Policy, participates in/cooperates with an investigation or resolution of a complaint under this Policy, and/or otherwise opposes conduct or practices prohibited by this Policy.

EMPLOYEE ASSISTANCE Any employee who requires support as a result of being the victim of or witness to any violation or suspected violation of this Policy is encouraged to seek confidential counseling through Airswift's Employee Assistance Program.