

Definitions

Term	Definition
Manager	As referenced in this policy, a Manager is the person to whom an employee directly reports

Overview

Corus Entertainment Inc. is committed to providing and maintaining a workplace which ensures that all employees of the company are treated with dignity and respect and are able to work in an environment free from discrimination and harassment. The company upholds as a matter of normal business practice, the freedom from discrimination and harassment provisions of applicable human rights legislation and/or applicable provincial Workers Compensation legislation, Employment Standards, Canada Labour Code and Occupational Health and Safety legislation (the “legislation”).

Policy

A. The Company’s Commitment

Corus Entertainment Inc. (the “company”) is committed to providing and maintaining a workplace which ensures that all employees of the company are treated with dignity and respect and are able to work in an environment free from discrimination and harassment.

Harassment is a form of discrimination, which is prohibited by law. It also undermines our established company Values whereby we commit ourselves to **Win Together, Think Beyond, Make It Happen, Show We Care** and **Learn Every Day**. The value Show We Care specifically calls out that Corus people are expected to support each other’s well-being, and a workplace free from discrimination and harassment is an essential component of living that commitment.

The company upholds as a matter of normal business practice, the freedom from discrimination and harassment provisions of applicable human rights, Canada Labour Code, Part II, occupational health and safety legislation (the “legislation”) and applicable provincial legislation.

B. Application of Policy

This Policy applies to all Corus employees (including directors and officers) and to all business-related activities between employees and third parties such as customers, contractors, vendors, suppliers, freelancers and members of the public. Furthermore, this Policy applies to all company locations, in all geographies.

The Policy covers all forms of discrimination and harassment prohibited by applicable legislation including, but not limited to, sex (including pregnancy), sexual orientation, gender identity, gender expression, race, ancestry, nationality, place of origin, colour, ethnic origin, citizenship, creed, religious beliefs, age, record of offences (pardoned criminal conviction), marital status, family status, same-sex partnership status and physical or mental disability.

In addition to all forms of harassment prohibited by legislation, this Policy also covers the area of personal harassment. Personal harassment can be behaviours such as, but not limited to, threatening behaviour, bullying, mobbing, taunting, belittling or ostracizing co-workers. Personal harassment may occur as a result of an employee's position in the company or because of an association with a group outside the company, or for any cause of personal dislike. Personal harassment may also arise out of someone abusing their position of authority or power, such as when an employee provides constructive feedback to a manager and then is later penalized for doing so indirectly through another matter. Such harassment contributes to a 'poisoned' work environment and will not be tolerated by the company.

Any employee who believes that he or she has been discriminated against or harassed in the workplace on any of these grounds, may use the procedures in this Policy. For the purpose of this Policy, the company's workplace includes any place where the business of the company is conducted or where company related social events or other functions of the company occur.

Nothing in this Policy is designed to stifle the creativity and artistic licence inherent within the nature of the business conducted by the company. Any on-air content or conduct, however, continues to be subject to the requirements of the CRTC and any other federal or provincial law, or other Corus policies as may be applicable.

C. What Is Harassment?

For the purpose of this Policy, harassment means vexatious comment or conduct, related to any grounds prohibited by applicable legislation, engaged in by someone who knows, or ought reasonably to know, that the comment or conduct is unwelcome.

Harassment may occur as a result of one incident or a series of incidents. The unwelcome comment or conduct does not have to be directed at a specific person for harassment to occur. Comments or conduct that tend to ridicule or disparage a group protected by legislation may give rise to an offensive hostile or 'poisoned' work environment and thus to harassment.

Examples of **sexual or gender based harassment** may include, but are not limited to:

- remarks, jokes, or innuendos about sex or sexual orientation where the speaker has been advised, or should otherwise be aware, that they are offensive or where they are by their nature offensive;
- leering or other offensive or sexually suggestive gestures;
- derogatory or degrading remarks used to describe or which are directed toward members of one gender or sexual orientation;
- the display or distribution (including use of electronic media) of sexually explicit or otherwise offensive material;
- refusing to work with people because of their gender, gender identity, gender expression or sexual orientation;
- unwelcome advances, invitations or propositions of a sexual nature or repeated invitations after previous requests have been refused;
- any advances, invitations or propositions of a sexual nature, or the refusal of any such advances, invitations or propositions, which might, on reasonable grounds, be perceived as placing a condition on a person's employment, work assignment, or on any opportunity for training or promotion;
- unwarranted inquiries or comments about a person's personal life;

- unwanted physical contact, including touching, patting, etc.;
- verbal abuse or threats of a sexual nature; and
- sexual assault

Examples of **racial, religious or cultural harassment** may include, but are not limited to:

- comment or conduct which disparages or ridicules a person's race, ethnic origin, colour, language or religion;
- insulting gestures or jokes which relate to race, ethnic origin, colour, language or religion;
- mimicking a person's accent, speech or mannerisms;
- the display or distribution, including use of electronic media, of derogatory materials which relate to race, ethnic origin, colour, language or religion; and
- refusing to work with people because of their race, ethnic origin, colour, language or religious background

Examples of **personal harassment** may include, but are not limited to:

- offensive, intimidating, malicious or threatening behaviour;
- bullying;
- misuse of power that humiliates or denigrates the recipient

Harassment on other grounds may follow similar patterns.

D. No Retaliation for Using This Policy

All employees have a right to make a complaint or enforce their rights under this Policy without retaliation or threat of retaliation. Retaliation against a person who makes a complaint or who enforces any right under this Policy, or who takes part in an investigation under this Policy, will be treated in the same manner as harassment.

Retaliatory behaviour could include:

- unwarranted criticism of a person's job performance;
- the arbitrary reassignment of a person to a different department, job or set of responsibilities;
- the failure to extend to a person (or others of the same group, sex or race) opportunities available to others;
- the refusal to work with a person or others of the same group, sex or race as the complainant; and
- the breach of the confidentiality requirements of this Policy

E. What To Do If Harassment Occurs

This Policy outlines both informal and formal options available to any employee who believes that he or she has been harassed by any other employee of the company. See the Procedures section for detailed steps to take in either type of complaint.

While the company is committed to resolving harassment concerns internally, nothing in this Policy precludes an employee from filing a complaint under applicable legislation or having criminal charges laid in appropriate cases.

F. Investigation of Formal Complaints

The Director, People will initiate an investigation whenever he or she receives a formal written complaint and in other circumstances where an investigation would be appropriate in the interest of ensuring that the company is free from harassment. An investigation might be appropriate where the Director, People becomes aware of a serious allegation or incident, or where a People Team Business Partner or Senior Manager, People has been approached by a person who does not wish to make a complaint, formal or informal, but who describes a very serious allegation or incident.

It is incumbent upon all employees to advise the Director, People or a People Team Business Partner of any known serious incident or allegation.

G. Disciplinary and Rehabilitative Actions

Disciplinary and rehabilitative action arising out of the informal resolution process or resulting from a formal complaint and subsequent investigation may include one or more of the following:

- a formal apology;
- counselling and/or attendance at educational seminars on harassment;
- a written warning delivered to the person who was deemed to have engaged in harassment, and placed in that person's employment file;
- a change of work assignment of the person complained about;
- the suspension with or without pay of the employee;
- the termination of the employee

In all cases where an intervention is warranted, the Director, People (or designate) is responsible for taking all reasonable measures to ensure that there is no retaliatory behaviour. Disciplinary action which involves suspension or termination from the company must be initiated in consultation with the appropriate business area VP, the Director, People and EVP, People and Communications.

Employees who engage in harassment may also expose themselves personally to damages in the event of a successful lawsuit or human rights case.

H. Confidentiality

It is essential that the complainant, respondent and all of those involved in the informal or formal investigation of a complaint maintain confidentiality throughout the formal or informal complaint procedure, the investigation and subsequent to the investigation. Both the formal and the informal complaint procedures will be carried out in strict confidence. Information obtained during an investigation, including identifying information about any individuals, will not be disclosed unless necessary for the purpose of investigating or taking corrective action. It is a serious breach of this Policy to break confidentiality unless disclosure of information relating to the complaint is required by law or is necessary in order for the proper investigation and resolution of the matter.

I. Harassment By and Towards Non-Employees of the Company

Corus acknowledges its responsibility to support and assist any employee of the company who believes that he or she has been harassed by persons outside the company during the course of their business-related interaction with the company. This includes customers, contractors, vendors, freelancers, suppliers and members of the public.

Any employee who believes that they have been harassed by a person outside the company in the course of their business-related interaction with that person, may bring their concerns to the attention of their Manager, another leader in the company, a People Team Business Partner or the Director, People. The Director, People will ultimately be responsible for appropriately investigating and resolving such matters.

If a non-employee believes that he or she has been harassed by a Corus employee in the course of business-related interaction with a Corus employee, then the non-employee is requested to immediately bring the matter to the attention of any Corus employee who shall immediately notify their manager, a People Team Business Partner, Senior Manager, People or the Director, People. The Director, People will ultimately be responsible for the proper investigation and resolution of such matters.

Any Corus employee who has knowledge of another Corus employee harassing a non-employee, is directed to immediately bring the matter to the attention of a People Team Business Partner, Senior Manager, People or the Director, People. The Director, People will ultimately be responsible for the proper investigation and resolution of such matters.

J. Posting and Reporting Requirements

A copy of this Policy will be placed on Corus Central.

The EVP, People and Communications will report quarterly in writing to the HR and Compensation Committee of the Board of Directors citing the number of cases (informal and formal) considered by the People Team Business Partners and the Director, People and describing the status of those cases.

K. The Company's Commitment Restated

The position of Corus with respect to discrimination and harassment at the workplace is very straightforward. Every employee of this company has the right to work in a dignified, respectful, discrimination-free and harassment-free environment.

Harassment at the workplace is a serious issue. This Policy must not be used maliciously or in bad faith. If the investigation proves that the complaint was deliberately made for frivolous or vindictive reasons, the employee making the false allegation is subject to discipline including termination for cause. This does not apply to complaints made in good faith but which are not proven.

Practices and Procedures

L. What To Do If Harassment Occurs

(a) Informal Complaint Option

In many situations, simply informing the person that his or her comment or conduct is unwelcome will resolve the issue. Telling the person to 'stop' may be difficult to do, but frequently it is the most effective means of eliminating the problem.

If an employee finds it too difficult to speak to the person directly (or if a conversation occurs but the unwelcome comment or conduct persists, or if it is felt that as a result there has been retaliatory behaviour) the employee is encouraged to discuss their concerns with the People Team, their leader or another leader who will escalate to the People Team Business Partner.

The People Team Business Partners are able to help employees clarify the options available to them, identify appropriate counselling or support services provided by Corus or third parties, such as the company Employee Assistance Program, and facilitate and assist in the informal resolution process.

After a discussion with a People Team Business Partner, the employee may wish to have the People Team Business Partner address the matter informally with the person whose behaviour has troubled them or accompany the employee in doing so. In some instances an informal complaint could result in a formal investigation, should this happen confidentiality will be maintained.

In every case where the People Team Business Partner addresses the matter informally, the People Team Business Partner will keep the employee apprised of how the matter is being addressed and of any proposed resolution initiatives. The People Team Business Partner will confer with their Senior Manager, People or the Director, People prior to resolving the matter. A confidential record of the matter will be kept in the confidential HR drive.

The People Team Business Partner will complete this informal procedure as soon as possible, normally within 7 – 14 days of learning about the case, unless a longer period is appropriate in the circumstances. In this case, the People Team Business Partner will communicate the proposed time frame.

(b) Formal Complaint Option

An employee may decide to make a formal written complaint under this Policy to the People Team Business Partner, Senior Manager, People or Director, People.

A formal written complaint may be made whether or not a People Team Business Partner has been spoken to and whether or not the People Team Business Partner agrees that there is evidence of harassment.

The employee may also make a formal written complaint in the event that the informal process does not resolve the matter to their satisfaction.

Upon receipt of a formal written complaint, the Senior Manager, People, or Director, People shall determine whether the conduct complained of falls within the scope of this Policy and in the event that it does not, shall advise the person making the complaint (the “complainant”) accordingly and shall take no further steps under this Policy.

Upon receipt of a formal written complaint, the Director, People (or a designate) may, in consultation with the complainant, attempt to resolve the matter informally with due consideration given to the nature of the complaint.

(c) Investigation of Formal Complaints

The Director, People will initiate an investigation whenever he or she receives a formal written complaint and the complaint is not resolved informally, if the complaint falls within the scope of this policy or in the case of an anonymous complaint if the Director, People considers an investigation appropriate in the interest of ensuring that the company is free from harassment. An investigation will be initiated in other circumstances where an investigation would be appropriate in the interest of ensuring that the company is free from harassment. An investigation might be appropriate where the Director, People becomes aware of a serious allegation or incident, or where a People Team Business Partner has been approached by a person who does not wish to make a complaint (formal or informal), but who describes a very serious allegation or incident.

The company expects Corus employees to advise the Director, People or a People Team Business Partner of any known serious incident or allegation, to ensure the safety and well-being of our people.

The investigation will ordinarily be conducted by an investigative team usually consisting of two (2) persons. The investigative team will usually include the Director, People (or designate) and one other person designated by the Director, People. The other investigative team member may be a manager, or a member of the People Team. The Director, People may elect not to participate in an investigation, in which case, the Director, People will designate two (2) persons to conduct the investigation with, again, due regard being given to the nature of, and parties to, the complaint.

If the complaint is against the Director, People, the complaint must be made in writing to the EVP, People and Communications. The EVP, People and Communications may designate someone external to the company to investigate the matter in accordance with the formal procedure. In this instance, the confidential record of the proceedings and the result will be retained by the EVP, People and Communications.

If the complaint is against the EVP, People and Communications, it must be made in writing to the President and CEO and EVP, General Counsel who will designate someone external to the company to investigate the matter in accordance with the formal procedure. In this instance, the confidential record of the proceedings and the result will be retained by the President and CEO.

If the complaint is against the President and CEO, it must be made in writing to the Executive Chair of the Board of Directors (the “Chair”) who will designate someone external to the company to investigate the matter in accordance with the formal procedure. In this instance, the confidential record of the proceedings and the result will be retained by the Chair.

The investigation will be completed and the appropriate resolution decided upon within 30 days of the Director, People receiving a formal written complaint or upon the Director, People electing to initiate a complaint, unless a longer period is appropriate in the circumstances. In this case, the Director, People (or designate) will notify the complainant, as well as the person whose conduct is complained of (the “respondent”), of the proposed time frame.

In the event that the complainant withdraws his or her involvement in a complaint at any stage during the informal or formal process, the Director, People remains obligated to pursue the matter if he or she believes that continued investigation is appropriate in the interest of ensuring that Corus is free from harassment. Examples of this would be, if there are concerns that the withdrawal of the complaint occurred as a result of possible retaliatory behaviour by the respondent or others, or in cases where there are previous complaints or incidents involving the respondent, or in cases involving allegations of inappropriate physical contact.

All procedural and administrative matters arising during the course of the investigation will be coordinated by the Director, People.

In the event that other commitments prevent the Director, People from expeditiously fulfilling any or all of the responsibilities conferred under this Policy or when he or she concludes that it is otherwise appropriate, the Director, People may designate another senior employee to act on his or her behalf.

In the course of the investigation, the investigative team will:

- notify the EVP, People and Communications as to the initiation of an investigation;
- interview the complainant regarding the written complaint;
- advise the respondent of the allegations;
- provide the respondent with an opportunity to respond to the complaint orally or in writing;
- investigate the complaint by speaking to the complainant, respondent and other individuals where appropriate; and
- notify the EVP, People and Communications as to the investigative findings
- in that instance where the respondent is the EVP, People and Communications the investigative team will notify only the President and CEO as to the investigative findings. In that instance where the respondent is the President and CEO, the investigative team will notify only the Chair as to the investigative findings.

Upon receipt of the investigative findings the Senior Manager, People, in consultation with the Director, People, will, where the complaint is substantiated:

- initiate appropriate disciplinary or rehabilitative action; and
- lodge a confidential record of the investigative proceedings and the result with the Director, People

And where the complaint is not substantiated:

- take no further action against the respondent, but
- share the findings with both the complainant and the respondent; and
- lodge a confidential record of the investigative proceedings and the result with the Director, People

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In the instance where the respondent is the EVP, People and Communications, the President and CEO in consultation with the EVP and General Counsel, will follow the procedures identified above. In the instance where the respondent is the President and CEO, the Chair in consultation with the HR and Compensation Committee of the Board will follow the procedures identified above.

Related Links

[Code of Business Conduct Policy](#)

[Social Media Policy](#)

[Employee Assistance Program](#)