



## CORPORATE GUIDELINES REGARDING DISCRIMINATION AND HARASSMENT POLICIES AND PROCEDURES

Samuel Manu-Tech Inc. ("SMT") is committed to providing a work environment that is free of discrimination and harassment. This commitment applies to all areas of employment including recruiting, hiring, training and development, promotion and termination. **Mutual respect** must be the basis of interaction among all employees in addition to co-operation and understanding. SMT will neither tolerate nor condone behaviour that is likely to create an intimidating, hostile or offensive environment.

**Harassment** can take many forms. It may be, but is not limited to, words, signs, jokes, pranks, intimidation, physical contact or violence. Harassment is not necessarily sexual in nature. Harassment is often an expression of perceived power and seniority by the harasser(s) over another person, usually for reasons over which the victim has little or no control. Discrimination or harassment based on race, colour, ethnic origin, religious or political beliefs, place of origin, sex, sexual orientation, age, handicap, marital or family status, or any legally prohibited grounds, will not be tolerated. Harassment can be further defined as any unwelcome action by a person, whether verbal or physical, on a single or repeated basis which humiliates, insults or degrades.

Properly discharged supervisory responsibilities including disciplinary action, or conduct that does not interfere with a climate of understanding and respect for SMT employees are **not** considered harassment or discrimination.

**Sexual harassment** is any unwanted attention of a sexual nature such as remarks about appearance or personal life, offensive written or visual actions like graffiti or degrading pictures, inappropriate physical contact of any kind, suggestive remarks, unwanted compliments with sexual overtones or sexual demands. Conduct is considered sexual harassment when one or more of the following conditions exist:

1. Submission to or rejection of such conduct or communication by an individual is used as a factor in decisions affecting such individual's hiring or employment;
2. Such conduct or communication has the purpose or effect of substantially interfering with an individual's employment or creating an intimidating, hostile or offensive employment environment.

"Unwelcome" or "unwanted" in all of the above contexts means any actions which the harasser(s) knows or ought reasonably to know are not desired by the victim of the harassment.

All SMT employees, and particularly supervisors, have a responsibility for keeping our work environment free of harassment. Any victim of harassment, if possible, should first ask the harasser to stop in the presence of a witness. Failing this, any employee who is aware of an unresolved incident of harassment of any kind, whether as the victim involved, by witnessing the incident, or by being told of it, should report it to their immediate supervisor or **any** management representative with whom they feel comfortable.

No employee will suffer any retaliation or intimidation as a result of registering a bonafide complaint of harassment, however, appropriate disciplinary action may be taken if such an allegation is found to be intentionally false. All reports will be promptly investigated. To the extent possible, the investigation will be conducted in a manner calculated to protect the privacy of the individuals involved.

Harassment in our workplace by any employee will result in disciplinary action as appropriate, up to and including dismissal and may also lead to personal legal and financial liability.