



Renewable Energy.  
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# **Workplace Environment Free of Harassment, Violence and Bullying Policy**

**Innergex Renewable Energy Inc.**

## WORKPLACE ENVIRONMENT FREE OF HARASSMENT, VIOLENCE AND BULLYING POLICY

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Innergex Renewable Energy Inc. and its subsidiaries (collectively “**Innergex**”) strive to create and maintain a work environment in which people are free from threats, harassment, violence or bullying of any sort and are treated with dignity and respect. As such, every employee is entitled to a work environment free of unacceptable behaviour such as harassment, violence and bullying and has the obligation to treat others in the same manner they wish to be treated.

The Board of Directors of Innergex is of the opinion that the implementation of a policy in respect of harassment, violence and bullying establishes clear rules for what constitutes harassment, violence and bullying, complaints, and investigation procedures in relation to such matters and promote compliance. This policy aims to ensure that Innergex team members will be treated in a fair and respectful manner. No form of harassment, violence or bullying by or directed at any of the Innergex employees, shareholders, directors, officers, suppliers, host communities, partners, sub-contractors and other stakeholders will be tolerated.

### 1 APPLICATION

This policy applies to each employee, officer and director of Innergex. This includes both regular and temporary employees working either full-time or part-time and consultants providing services to Innergex, suppliers and clients (each an “**Innergex team member**” or collectively the “**Innergex team members**”).

This policy will be applied jointly with all other Innergex policies, including without restrictions the Innergex Code of Conduct and Whistle-Blowing Policy. Nothing in this policy is intended to limit the obligations, rights or recourses made available by law to Innergex or the Innergex team members.

### 2 WHAT CONSTITUTES HARASSMENT, VIOLENCE AND BULLYING

For purposes of this policy, harassment, violence and bullying means

- any vexatious behavior in the form of hostile, repeated or unwelcome conduct;
- comments or actions, that affects or may affect the dignity or psychological or physical integrity of an Innergex team member and that creates a harmful, intimidating, hostile or humiliating work environment for that person
- sexual harassment which means conduct that is manifested by word or acts having sexual connotation, which are unwanted, and which by their nature injure a person’s dignity; and

- discrimination based on social background, sexual orientation, disability, race, religious belief, political opinion, or trade union membership or activities.

**Examples of behaviour that may constitute harassment, violence or bullying:**

- **Posting or circulating offensive pictures or materials, whether in print form or via email or other electronic means;**
- **Singling out a person for humiliating or demeaning “teasing” or jokes;**
- **Any jokes with sexual connotations; or**
- **Unwelcomed sexual solicitations or advances.**

### 3 PREVENTION

Innergex is committed to protecting all persons working with or within Innergex and shall take reasonable precautions to prevent workplace harassment, violence and bullying. Innergex team members may be required to attend trainings or seminars on the subject of workplace harassment, violence and bullying periodically.

### 4 WHAT TO DO WHEN HARASSMENT, VIOLENCE OR BULLYING OCCURS

In the event of an emergency or in circumstances where the immediate safety of persons is at risk, Innergex team members must contact local emergency services.

**Failure to report an incident limits Innergex’s ability to investigate and take appropriate action**

Innergex team members are encouraged to speak-up and report incidents of harassment, violence or bullying. Any Innergex team member who becomes aware of an incident or feels that he/she has experienced any form of harassment, violence or bullying (a “**Complainant**”) is, where appropriate and safe to do so, encouraged to discuss his/her concerns with the perpetrator(s) of such conduct or comment (a “**Respondent**”) as soon as possible and ask the Respondent to stop the offensive behavior.

In any event and where such a discussion is inappropriate, unsafe, or unsuccessful, the Complainant should immediately report the incident to his/her manager, the Human Resources Department or the Legal Department.

Alternatively, the Complainant may also contact the Innergex EthicsLine to make a good-faith report about misconduct or a perceived misconduct. Reports made on the Innergex EthicsLine may be made anonymously. The Innergex EthicsLine is operated by an independent service provider operating 24 hours a day, seven days a week. They have operators who will be able to answer your call and document the report in French, English and Spanish. The logged report is then forwarded to the Chief Legal Officer and Secretary and the Chief Human Resources Officer, in order to ensure a follow-up and investigation of the complaint.

**To reach the Innergex EthicsLine, you may:****Dial toll free:**

Within Canada or the US: 1-844-809-9450  
 In France: +44 20 8939 1650  
 In Chili: Telmex: 800-225-288  
 Telefonica: 800-800-288  
 ENTEL: 800-360-312

**Or follow this link:** [www.innergex.ethicspoint.com](http://www.innergex.ethicspoint.com)

In particular, if the Complainant's manager is the alleged Respondent, the Innergex team member should use the Innergex EthicsLine.

Innergex will investigate complaints promptly and may conduct investigations on its own initiative.

## 5 INVESTIGATION PROCEDURE

As may be appropriate in the circumstances, the Chief Legal Officer and Secretary or the Chief Human Resources Officer will designate one or more member(s) of the Human Resources Department or the Legal Department or a qualified third party to promptly conduct an impartial investigation of the complaint. The designated individual(s) responsible for the investigation shall in no event be under the direct control of the alleged Respondent(s).

Such investigation will be undertaken promptly and diligently, and be as thorough as required under the given circumstances. In addition, the investigation will be fair and impartial. Its focus will be to uncover the facts and evidence relevant to the incident in question, while ensuring that the Complainant and Respondent receive equal treatment and are given the opportunity to separately address evidence and allegations related to the complaint.

All Innergex team members are required to cooperate with investigations conducted according to this policy. They must preserve all documentation, written communications or other evidence related to an incident of harassment, violence or bullying. Investigations of any such complaints

### Stages in a more complex investigation could include:

- A review of details of the incident or complaint, including any relevant documents an interview or interviews with the worker alleging harassment;
- An interview or interviews with the alleged harasser;
- Separate interviews with relevant witnesses;
- Examination of relevant documents or other evidence that pertains to the investigation (such as emails, notes, photographs, or videos);
- A decision about whether a complaint or incident is workplace harassment; and
- Preparation of a report summarizing the incident or complaint, the steps taken during the investigation, the evidence gathered, and findings.

are very sensitive and may involve private, reputational and very personal matters. The parties and participants to an investigation will be invited to maintain the confidentiality of the matter.

## **6 NO RETALIATION**

No disciplinary measures will be taken against an Innergex team member because he or she reports an incident or cooperates with an investigation in good faith. The Complainant will be subject to the provisions and protections outlined in the Innergex Whistle-Blowing Policy. The Company will strive to maintain confidentiality and to protect the interests of all concerned persons who report a breach in good faith or who cooperate with an investigation conducted according to this policy. During the investigation, Innergex may take any number of appropriate preventative measures, required to ensure that the harassment, violence or bullying does not continue or increase.

## **7 RECTIFICATION AND DISCIPLINARY MEASURES**

Upon completion of the investigation, the individual(s) responsible for its execution shall prepare a written report setting out the conclusions of the investigation, as well as the facts, information and sources on which such conclusions are based. Relying on this report, Innergex will take any corrective action deemed appropriate to give effect to this policy, including disciplinary action up to and including termination of employment. Innergex may also take all follow-up measures deemed appropriate to ensure the proper reintegration of a Complainant, determined to have been victim of harassment, violence or bullying.

An investigation may also be completed by informal resolution of the complaint such as, for example, if both parties agree to participate in an informal mediation or agree to implement corrective or preventive measures.

The Chief Legal Officer and Secretary or the Chief Human Resources Officer will report all investigations and their conclusions to the Board of Directors of Innergex at least once a year.

All documentation, communication and reports relating to a complaint will be retained by Innergex in accordance with its Records Management and Retention Policy.

Following each incident of alleged harassment, violence or bullying, members of the Human Resources Department or Legal Department will review the findings of the related investigation, with the intent of drawing lessons learned and preventing future incidents.

## **8 ANNUAL REVIEW**

This policy will be reviewed every year by the Board of Directors of Innergex.

This policy is available:

- on Vision at <https://ingxinfra.sharepoint.com/sites/visionApp>; or
- on the intranet at <https://ingxinfra.sharepoint.com/sites/connect>; or
- on our website at [www.innergex.com](http://www.innergex.com); or
- from the Corporate Secretary's Office or the Human Resources Department.