

EQUAL EMPLOYMENT AND HARASSMENT POLICY

Statement

Right To Play provides equal employment / consultancy / fee-for-service / volunteer / internship opportunities regardless of race, ancestry, place of origin, color, ethnic origin, creed, sex, sexual orientation, age, marital status, family status or handicap.

This policy prohibits discrimination or harassment on any of the above grounds and applies to all Right To Play activities in the workplace and elsewhere.

Scope

This policy applies to all employees / consultants / volunteers / interns / fee-for-service providers and other representatives (collectively called "Team Members") of Right To Play.

Definitions and Explanations

"Discrimination" is defined as taking decisions in regard to employment matters including recruitment, selection, compensation, benefits, promotion, transfer, and any other term or condition of service on the basis of any of the prohibited grounds (race, ancestry, place of origin, colour, ethnic origin, creed, sex, sexual orientation, age, marital status, family status or handicap) to the detriment of persons or groups belonging to one or more of the categories under the said grounds.

"Harassment" is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual or group because of any of the above-listed prohibited characteristics and/or that:

1. Has the purpose or effect of creating an intimidating, hostile or offensive work environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or
2. Otherwise adversely affects an individual's employment / consultancy / fee-for-service / volunteer / internship opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs, negative stereotyping, or threatening, intimidating, or hostile acts, including acts purporting to be "jokes" or "pranks"; unwelcome sexual advances; unwelcome requests for sexual favors; other verbal or physical conduct of a sexual nature; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of his or her membership in any of the above-referenced groups.

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Responsibility

This policy is administered by the Human Resources Department. Specific responsibilities include:

Responsibility of Human Resources:

- (a) Preparing and implementing a written policy on Equal Employment and Non-Harassment
- (b) Reviewing the policy at least once every three years
- (c) Administering and interpreting the policy
- (d) Informing all employees of the policy and getting their sign-off at the time of hire as part of the employment contract package
- (e) Aiding and advising in investigations of discrimination or harassment
- (f) Aiding and advising in disciplinary action to be taken in cases of discrimination or harassment.

Responsibility of Managers:

- (a) Following the policy and procedure
- (b) Investigating complaints of discrimination or harassment
- (c) Implementing appropriate administrative or disciplinary measures in cases of discrimination or harassment.

Responsibility of Employees:

- (a) Following the policy and procedure
- (b) Reporting instances of discrimination or harassment to the organization
- (c) Cooperating in investigations of discrimination or harassment

Procedure

Non-Retaliation:

It is against Right To Play's policy for a retaliatory action to be taken against an individual who in good faith reports a perceived violation of this policy or against individuals who are not themselves complainants, but who participate in an investigation.

Appropriate disciplinary action (up to and including termination of employment / consultancy / fee-for-service / volunteer / internship agreements) will be taken against an individual found to have engaged in harassment, a manager found to have knowingly allowed harassment to continue, or a Team Member found to have knowingly made a false complaint.

In case of violation of this policy:

Step 1: If possible, the Team Member should make the person harassing him/her aware that the behaviour is unwelcome to the Team member. Make it clear that the behaviour is to stop immediately.

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Step 2: If the Team Member is unsuccessful, or feels uncomfortable performing Step 1, he/she should speak to the supervisor, an Executive Team member or the Director Human Resources (as preferred under the circumstances and given the facts).

Step 3: If the Supervisor is involved, the Team Member can speak to an Executive Team member or Director, Human Resources (as preferred under the circumstances).

What happens when a complaint is made?

Step 1: The recipient of the complaint must document the complaint and immediately refer the complaint to an Executive Team member or the Director, Human Resources.

Step 2: The person to whom the complaint is referred should set-up a small fact-finding group which may include an external advisor.

Step 3: The fact-finding group will conduct a discreet investigation with the maximum possible sensitivity and confidentiality.

Step 4: The group shall propose a solution to resolve the situation and communicate that the proposal to all concerned parties in an appropriate manner. The confidentiality of the information relating to the process is to be maintained at all times throughout.

Other Recourse:

Nothing stated in this policy is meant to limit a complainant's right to other action.

Attachments

Equal Employment and Harassment statement to be signed by all Team Members

References

Human Rights Codes of applicable jurisdictions

Code of Conduct Investigation Guide

Sexual Harassment Investigation Guide

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