



## Respectful Workplace Policy

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**August 1, 2023**

## TABLE OF CONTENTS

<b>1.0</b>	<b>PURPOSE, APPLICABILITY AND SCOPE.....</b>	<b>3</b>
1.1	Purpose .....	3
1.2	Applicability.....	3
1.3	Scope.....	3
<b>2.0</b>	<b>DEFINITIONS, ABBREVIATIONS AND ACRONYMS .....</b>	<b>4</b>
2.1	Definitions.....	4
<b>3.0</b>	<b>RESPONSIBILITIES.....</b>	<b>6</b>
3.1	Responsibilities .....	6
3.2	Confidentiality.....	7
<b>4.0</b>	<b>REPORTS OF WORKPLACE <i>HARASSMENT</i> OR <i>VIOLENCE</i>.....</b>	<b>7</b>
4.1	Complaints of Workplace <i>Harassment</i> or <i>Violence</i> .....	7
<b>5.0</b>	<b>REFERENCES AND RELATED DOCUMENTS .....</b>	<b>9</b>
5.1	References .....	9
5.2	Related Documents.....	9
<b>6.0</b>	<b>QUESTIONS .....</b>	<b>10</b>
<b>7.0</b>	<b>APPENDIX A - LIST OF ALBERTA AND SASKATCHEWAN’S LEGISLATION DEALING WITH <i>HARASSMENT</i> .....</b>	<b>11</b>

## 1.0 PURPOSE, APPLICABILITY AND SCOPE

### 1.1 Purpose

Inter Pipeline Ltd. (“Inter Pipeline” or “IPL”) is committed to providing a workplace in which all individuals are provided the opportunity to be their best selves and perform to their highest capacity. Each of us has a personal responsibility to our colleagues and to Inter Pipeline to take an active role in achieving a safe and respectful work environment.

Inter Pipeline’s vision of a respectful workplace is one in which acceptance, cooperation, courteousness, honesty, integrity, and personal accountability are emphasized in order for all employees to achieve excellence. Every person has the right to work in an environment that is safe, healthy and free from workplace *harassment*<sup>1</sup> and *violence*, which includes an environment free from *discrimination*, *bullying* and *sexual harassment*.

### 1.2 Applicability

This Respectful Workplace Policy applies to all directors, officers, employees, contingent workers,<sup>2</sup> and contractors<sup>3</sup> (collectively, “**IPL Representatives**” or “**you**”) of Inter Pipeline Ltd. and its controlled subsidiaries (collectively, “**Inter Pipeline**”, “**IPL**” “**we**”, “**us**”, “**our**”, or the “**Company**”). This policy also applies to any individuals from outside the company in their interactions with IPL employees, during and outside of work hours, within or outside of the workplace.

Examples of the application of this policy include all interactions that occur on the company premises, or any other location where employees may engage in company business, activities, or social events. Other examples include tele/videoconferences and meetings, work-related social functions, work-related conferences or training sessions and work-related travel, including travel in company-supplied vehicles and personally-owned vehicles when being used for work-related purposes.

This policy also applies to use of company provided smart or cell phones, computers, computer networks, social media or other electronic medium that directly or indirectly relate to IPL IPL Representatives and to any other verbal, written, recorded or published comments or statements that directly or indirectly relate to IPL, occurring at or outside the workplace and during or outside work hours. For further information please refer to IPL’s IP-IT-POL-0003 Social Media Policy.

### 1.3 Scope

Inter Pipeline is committed to eliminating or, if that is not reasonably practicable, controlling the hazards of workplace *harassment* and *violence*, IPL will not tolerate any form of workplace *harassment* or *violence*. It will make every reasonably practicable effort to ensure that none of its workers are subjected to workplace *harassment* or *violence*. In

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<sup>1</sup> Italicized words in this Policy shall have the defined meanings set out throughout this Policy.

<sup>2</sup> For purposes of this policy, “contingent workers” include consultants and others, whether self-employed, incorporated, or made available to the Company through agency relationships, whose services are performed under contract to Inter Pipeline.

<sup>3</sup> For purposes of this policy, “contractors” includes, but is not limited to, subcontractors, suppliers, consultants, IPL Representatives, agents, advisors, and service providers engaged by the Company.

this regard, the following guidelines have been developed. IPL will investigate incidents of workplace *harassment* or *violence*, and take corrective action if anyone under IPL's direction subjects any of IPL's employees, contractors, workers, suppliers, clients or vendors to workplace *harassment* or *violence* or otherwise contravenes this policy, including taking disciplinary action up to and including termination of employment for just cause or contract for fundamental breach.

## 2.0 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

### 2.1 Definitions

***Bullying*** – *Bullying* includes acts or verbal comments aimed at a specific person or group that causes psychological harm and it may also include physical abuse or threat of abuse. *Bullying* is often conscious, willful, and deliberate, consisting of a hostile pattern of behaviour marked by an imbalance of power, intent to harm and/or threat of aggression.

Examples include, but are not limited to, repeated and unwelcome remarks or gestures, relentless criticism, confining, isolating, excluding, belittling, intimidation, verbal abuse/name calling, harmful hazing practices, vandalizing or tampering with personal belongings, spreading malicious rumours, and other actions that are perceived as a serious threat to the employee and/or their job.

***Discrimination*** – *Discrimination* occurs when an individual or group is treated differently based on the grounds set out in the applicable human rights legislation, included in Appendix A<sup>4</sup>.

Examples include, but are not limited to: making jokes concerning a person's ethnic origin, failing to promote an employee because the supervisor is uncomfortable with the employee's sexual orientation, and the assumption that a single parent's child care arrangements will compromise his/her opportunity to work overtime hours.

***Employees*** – Individuals hired to provide services directly to Inter Pipeline in exchange for payment. Insofar as this policy applies to contractors, nothing in this policy is to be construed as deeming IPL to be the employer of a contractor. Contractors must abide by this policy or have in place a policy that exceeds the objectives of this policy and the law.

***Harassment*** – *Harassment* includes any inappropriate, objectionable or unwelcome conduct, comment, *bullying*, display, action or gesture that intimidates, offends, degrades or humiliates a particular person or group. *Harassment*;

- (i) constitutes a threat to the health or safety of an individual;
- (ii) is based on a statutorily protected or prohibited ground under the particular human rights, health and safety, employment standards or similar legislation applicable to the workplace of the employees involved, included in Appendix A; or
- (iii) adversely affects the individual's psychological or physical well-being and that the person knows or ought reasonably to know would cause an individual to be

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<sup>4</sup> See Appendix A for a list of Alberta and Saskatchewan's provisions dealing with harassment and the right to request assistance of an occupational health officer to resolve a complaint of harassment.

humiliated or intimidated but does not include any reasonable action that is taken by IPL, or a manager or supervisor of IPL, relating to the management and direction of IPL's workers or the place of employment.

To constitute *harassment* the following must be established:

- repeated conduct, comments, displays, actions, or gestures; or
- a single, serious occurrence of conduct or a single, serious comment, display, action, or gesture, that has a lasting, harmful effect on the individual.

*Harassment* does not include reasonable actions taken in good faith while exercising managerial/supervisory rights and responsibilities such as assigning work, including workplace accommodations, appraising performance, giving constructive feedback and taking progressive disciplinary action. Differences of opinion or minor disagreements between co-workers are also not generally considered to be workplace *harassment* but can turn into *harassment* if no steps are taken to resolve the conflict.

**Sexual Harassment** – *Sexual harassment* includes conduct, comment, display, action, gesture or contact of a sexual nature that is likely to cause offence or humiliation to the employee or that might, on reasonable grounds, be perceived by that employee as placing a condition of a sexual nature on employment or on any opportunity for training or promotion. Behaviour that is acceptable to both parties involved, such as flirtation, chit-chat, good-natured jesting or relationships of mutual consent would not be considered *sexual harassment*. However, if one person no longer wants the behaviour or relationship to continue, then the conduct has the risk of being deemed *sexual harassment* should the behaviours continue. *Sexual harassment* is coercive and one-sided and anyone can be subjected to it.

Examples include, but are not limited to, a sexual solicitation or advance, unwanted physical contact, unwanted gestures or actions which have sexual connotations, unwanted verbal conduct, and denigration because of gender, including sexual orientation.

**The Investigation Team** – IPL will establish an Investigation Team (the “Team”) to oversee the investigation of reported complaints of workplace *harassment* or *violence*. Members of this Team will be impartial and, as a minimum, be comprised of a Human Resources representative and another, impartial representative of IPL. Health and Safety and Security IPL Representatives will be included in the Team for all complaints of workplace *violence*. The Team will appoint an investigator(s) to conduct an investigation, review summary reports and recommend actions for resolution.

**Workplace Violence** – *Violence*, whether at the workplace or work-related, is defined as the attempted, threatened 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*. The conduct or behaviour may be verbal, written or physical.

Examples include, but are not limited to: physical fights (including pushing, slapping and punching), verbal or written threats that express an intent or have the potential to cause harm, threatening behaviour such as shaking fists, destroying property or throwing objects and any other act that would be reasonably expected to cause harm, injury or illness, or other words or gestures that would reasonably give rise to an apprehension of imminent harm, injury or illness.

## 3.0 RESPONSIBILITIES

### 3.1 Responsibilities

All IPL Representatives have a responsibility to treat everyone with dignity and respect and contribute to establishing IPL's vision of a respectful workplace. Should you experience or witness *harassment* or *violence* you should inform the person whose behaviour is causing concern that their behaviour is unwelcome and request that they stop the behaviour immediately or subsequently report the incident to an IPL representative as outlined in the reporting procedures in this policy.

#### ***IPL Representative Responsibilities***

- Understand and comply with this policy;
- Behave in a manner consistent with creating a respectful workplace and maintain positive interactions at work;
- Report incidents of Discrimination, Violence or Harassment experienced directly or witnessed;
- Immediately report any violent or potentially violent incident as outlined in this policy;<sup>5</sup>
- Participate and cooperate in any investigations of Discrimination, Violence or Harassment if, and to the extent required, by the circumstances of the investigation; and
- Understand and follow organizational procedures to prevent Discrimination, Violence and Harassment, including addressing it as soon as you are aware.

#### ***Leader Responsibilities***

All leaders should strive to create a work environment in which IPL Representatives feel comfortable reporting incidents and raising concerns or questions about Inter Pipeline's policies. This includes:

- Understand how to recognize and handle a workplace Discrimination, Violence or Harassment incident or complaint so that it does not go unaddressed;
- Manage interpersonal conflicts within the team before they escalate;
- Encourage everyone to report incidents or complaints of Discrimination, Violence or Harassment, or escalate all complaints to Human Resources (even those about his/her own behavior); and
- Participate and cooperate in any investigations of Discrimination, Violence and Harassment if, and to the extent required, by the circumstances of the investigation.

The senior executives and IPL Officers are responsible for taking reasonable measures to:

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<sup>5</sup> In the event of an extreme or imminent threat of physical harm to themselves or any person, you should contact law enforcement (i.e., the city police or RCMP as applicable) using emergency procedures.

- Establish a “tone from the top” reflective of a Respectful Workplace;
- Protect employees from Workplace Discrimination, Violence and Harassment;
- Promote a work environment where everyone is comfortable reporting violations;
- Implement a program where complaints are dealt with in an appropriate and timely manner, as required; and
- Provide training as deemed appropriate or where required by law.

### ***VP People & Stakeholder Relations Responsibilities***

The VP, People & Stakeholder Relations or delegate will:

- Act as coordinator of the Team and investigative process, including establishing an investigation team, and obtain legal advice as required;
- Coordinate ongoing support for impacted IPL representatives to ensure incidents are fairly and thoroughly managed, documented appropriately and that all are informed of their responsibilities and are aware of the procedures to follow.
- Notify the Senior Manager, H&S or delegate of any incidents and arranging a call or meeting within twenty-four hours of being notified of the incident of workplace violence to clarify the response, assign investigator(s) including a lead, and start the investigative process.
- Notify the leader in the impacted group of the incident if they are not already aware.

The Investigation Team will be responsible for overseeing the investigation of complaints and for ensuring that appropriate corrective action is taken.

### **3.2 Confidentiality**

IPL will preserve confidentiality regarding all incidents of workplace *harassment* and *violence*. IPL will not disclose the circumstances related to an incident of workplace *harassment* or *violence*, including the names of the complainant, the respondent, and any witnesses, except (i) where necessary to investigate the incident or to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident (ii) where necessary to inform employees of a specific or general threat of workplace *violence* or potential workplace *violence*, or (iii) as required or authorized by law. IPL will disclose only the minimum amount of personal information that is necessary to inform employees of a specific or general threat of workplace *violence* or potential workplace *violence*.

## **4.0 REPORTS OF WORKPLACE HARASSMENT OR VIOLENCE**

### **4.1 Complaints of Workplace *Harassment* or *Violence***

All complaints and incidents will be handled expediently with consideration and respect for the complainant, respondent, witnesses and all parties involved. IPL in consultation with the Joint Health and Safety Committee has developed IP-HR-PRC-0002 Workplace Harassment Prevention and Response Procedure and IP-HR-PRC-0001 Violence Prevention and Response Procedure, which describes:

- Training of IPL staff on the Respectful Workplace Policy, Workplace Harassment Prevention and Response Procedure, and Violence Prevention and Response Procedure;
- Information about the nature and extent of the hazard of workplace harassment or violence;
- Measures to eliminate or control the hazard of workplace harassment and violence;
- Specific procedures to report incidents and to access immediate assistance when an incident of violence occurs; and;
- The process to investigate and document a complaint or incident and how the results of the investigation will be communicated.

IPL encourages you to bring matters of workplace harassment or violence, or of any disrespectful conduct, whether you are the subject or witness, to its attention as outlined in IP-HR-PRC-0002 Workplace Harassment Prevention and Response Procedure or IP-HR-PRC-0001 Workplace Violence Prevention and Response Procedure so that these matters can be resolved efficiently, effectively, impartially and with the least amount of intrusion into your personal or work life. However, nothing in this Policy prevents or is meant to discourage an employee from calling the police or referring a complaint of workplace harassment or violence to the applicable regulatory body, including Occupational Health and Safety or human rights. An employee also may exercise any other legal rights available.

Employees who have experienced workplace harassment or violence are encouraged to seek assistance from the Company-provided [Employee and Family Assistance Program](#) or from an appropriate health care professional of their choice.

***You can also report through the Company's reporting hotline.***

If you are not comfortable with any of the above resources for reporting purposes, to facilitate the reporting of suspected violations, especially in circumstances where the reporting individual wishes to remain anonymous, suspected or actual violations of this policy may be reported to the independently operated hotline that can be accessed via telephone or the internet (the "Reporting Hotline") in accordance with Inter Pipeline's Whistleblower Policy or via mail.

IPL Representatives making reports may request anonymity, however, anonymity is encouraged only where absolutely necessary due to the inherent difficulty it presents in assessing and following up on concerns. If you choose to remain anonymous and/or do not provide sufficient detail, we may not be able to engage meaningfully with the concern raised. Best efforts will be taken to ensure anonymity when requested, however, such treatment cannot be guaranteed and is subject to legal disclosure requirements. A reporter's identity may also be disclosed to those with a need to know (including but not limited to the Ethics and Compliance Committee) in order to progress and resolve reports.

The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Details for these methods of reporting are as follows:

Ethics hotline: 1-855-409-0971

Ethics website : [www.interpipeline.ethicspoint.com](http://www.interpipeline.ethicspoint.com)

Mail: Inter Pipeline Ltd.



3200 2nd Street SW  
Calgary, AB, T2P 1M4  
Attn: Chief Ethics and Compliance Officer

All whistleblower reports made pursuant to this Policy will be communicated to the Ethics and Compliance Committee (comprised of the Chief Ethics and Compliance Officer, Vice President – Legal & Compliance, Vice President – People & Stakeholder Relations, and General Manager of Human Resources) unless one or more members of the Ethics and Compliance Committee are connected to, or the subject matter of, the report in question. In respect of all reports, the Ethics and Compliance Committee will determine the appropriate investigation steps, if any. If deemed required by the Chief Ethics and Compliance Officer or Ethics and Compliance Committee, reports will also be forwarded to the Inter Pipeline Board of Directors or an appropriate Board of Directors committee.

Records pertaining to a report and investigation are the property of Inter Pipeline and will be retained in compliance with applicable laws and Inter Pipeline's document retention policies and procedures. It is important for reporting IPL Representatives to understand that they may not be made aware of the outcome of their report or related investigation. Inter Pipeline will use best efforts to inform reporting IPL Representatives of the outcome of a report or investigation, however, legal, and other constraints, including privacy laws, may prevent Inter Pipeline from doing so.

## **5.0 REFERENCES AND RELATED DOCUMENTS**

### **5.1 References**

List of relevant internal publications related to the topic of this policy.

1. IP-HR-PRC-0001 [Workplace Violence Prevention and Response Procedure](#)
2. IP-HR-PRC-0002 [Workplace Harassment Prevention and Response Procedure](#)
3. IP-IT-POL-0003 [Social Media Policy](#)

### **5.2 Related Documents**

List of relevant external publications related to the topic of this policy.

1. Alberta Human Rights Act, RSA 2000, c A-25.5
2. (Alberta) Occupational Health and Safety Act, SA 2020, c O-2.2
3. (Alberta) Occupational Health and Safety Regulation, Alta/Reg 62/2003
4. (Alberta) Occupational Health and Safety Code, Alta/Reg 191/2021
5. The Saskatchewan Human Rights Code, 2018, SS 2018, c S-24.2
6. (Saskatchewan) The Occupational Health and Safety Regulations, 2020, RRS c S-15.1 Reg 10
7. The Saskatchewan Employment Act, SS 2013, c S-15.1

## **6.0 QUESTIONS**

If you have any questions with respect to this policy, please contact:

Breanne Oliver

Vice President, People & Stakeholder Relations

Phone: 587.475.1118

Email: [breanne.oliver@interpipeline.com](mailto:breanne.oliver@interpipeline.com)

## 7.0 APPENDIX A - LIST OF ALBERTA AND SASKATCHEWAN'S LEGISLATION DEALING WITH HARASSMENT

Jurisdiction	Protected or Prohibited Grounds	Commissions	Applicable Laws
Alberta	Race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation.	<p><b>Alberta Human Rights Commission Northern Regional Office</b></p> <p>800 Standard Life Centre 10405 Jasper Avenue NW Edmonton, AB T5J 4R7 P: (780) 427-7661 F: (780) 427-6013</p> <p><b>Alberta Human Rights Commission Southern Regional Office</b></p> <p>200 J.J. Bowlen Building 620 7 Avenue SW Calgary, AB T2P 0Y8 P: (403) 297-6571 F: (403) 297-6567</p>	<p><i>Alberta Human Rights Act, RSA 2000, c A-25.5</i></p> <p><i>Occupational Health and Safety Act, SA 2020, c O-2.2</i></p> <p><i>Occupational Health and Safety Regulation, Alta/Reg 62/2003</i></p> <p><i>Occupational Health and Safety Code</i></p>
Saskatchewan	Race or perceived race, creed, religion, colour, sex, sexual orientation, family status, marital status, disability, physical size or weight, age, nationality, ancestry, place of origin, receipt of public assistance or gender identity.	<p><b>Saskatchewan Human Rights Commission</b></p> <p>8th Floor, Sturdy Stone Bldg 122-3rd Avenue North Saskatoon, SK S7K 2H6</p> <p>P: (306) 933-5952 Toll free: 1-800-667-9249 F: (306) 933-7863 TTY: (306) 373-2119</p>	<p><b><i>The Saskatchewan Human Rights Code</i></b>, SS 1979, c S-24.1</p> <p>Provisions respecting discriminatory practices and the worker's right to file a complaint with the Saskatchewan Human Rights Commission: 16 and 27.</p> <p><b><i>The Saskatchewan Employment Act</i></b>, SS 2013, c S-15.1</p> <p>Provisions dealing with harassment and the right to request assistance of an occupational health officer to resolve a complaint of harassment: 3-1(1)(l), (o), (4) and (5); 3-8 – 3-10; 3-31 – 3-36; 3-54; 3-67; and 4-5.</p> <p><b><i>The Occupational Health and Safety Regulations, 1996</i></b>, RRS c O-1.1 Reg 1</p>
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Document Owner	Title	
Name: Breanne Oliver	VP People & Stakeholder Relations	
Reviewers	Title	Review Date
Desmond Salisbury	GM Human Resources	July 2023
Legal & Compliance		March 2022

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4	1-July-2023	IFImp (Issued for Implementation)
3	22-March-2022	IFImp (Issued for Implementation)
2	1-Sep-2019	IFImp (Issued for Implementation)
1	1-Sept-2013	IFImp (Issued for Implementation)

## CHANGE HISTORY

REV	Issued	Section / Page	Description of Changes
1	1-Sept-2013	All	Initial version
2	1-Sep-2019	All	Updated to reflect legislative changes and move some content into separate procedures.
3	22-March-2022	All	General Updates & Clean Up
3	1-July-2023	All	General Updates & alignment to other policies