



1. PURPOSE

AltaGas is committed to having a **workplace** where everyone is treated with respect and dignity. **We** are dedicated to creating and maintaining a **workplace** where **personnel** can carry out their duties in a safe environment, without fear of **discrimination, harassment, bullying, cyber bullying, or workplace violence**.

2. SCOPE

This policy applies to all personnel and to all individuals who are present in the workplace, including, but not limited to, suppliers, customers, guests or other members of the public. Personnel should also reference any local procedures or guidelines applicable in their workplace.

3. POLICY STATEMENTS

3.1. Reporting

Any allegation of **discrimination, harassment, bullying, cyber bullying, workplace violence** or other disrespectful, inappropriate or offensive behaviour will be taken seriously and dealt with promptly by **AltaGas**. **Complaints** should be reported to your manager/supervisor, another leader with whom you feel comfortable, or Human Resources personnel, using the procedures applicable to your **workplace** location.

3.2. AltaGas Commitment

AltaGas is committed to maintaining a **workplace** and culture of respect, dignity and safety, free from **discrimination, harassment, bullying, cyber bullying, and workplace violence**. In furtherance of this commitment, **we** will:

- Base hiring or placement decisions on an individual's qualifications for the position to be filled;
- Administer compensation, benefits, transfers, company-sponsored training, and social and recreational programs without regard to any **protected ground**;
- Communicate to all supervisors, managers and employees that treating individuals with respect, dignity and in accordance with all **AltaGas** policies and applicable legal requirements is an essential part of their responsibilities;
- Provide safe and effective options for **personnel** to submit **complaints**;

- Investigate, address and resolve **complaints** in an objective, respectful, consistent, and timely manner;
- Keep any investigative processes confidential to the extent possible, and involve only those people deemed necessary to address the **complaint**;
- Support and protect from retaliation **personnel** who act in good faith in reporting an incident of **discrimination, harassment, bullying, cyber bullying, workplace violence** or other disrespectful, inappropriate or offensive behaviour or participating in a **workplace** investigation of such matters; and
- Take necessary action in response to findings of **discrimination, harassment, bullying, cyber bullying, workplace violence** or other disrespectful, inappropriate or offensive behaviour, including removing individuals from the **workplace** and/or, in the case of employees, disciplinary action up to and including termination of employment for cause and/or impacts to performance assessment and compensation, including incentive compensation; and, for consultants, contractors and contingency workers, failure to observe the standards set forth in this **policy** may be considered a breach of contract resulting in termination of the contract.

AltaGas prohibits reprisals and retaliation against any individual who, in good faith:

- Has made a **complaint**;
- Identified or opposed a practice that they reasonably believe constitutes **discrimination, harassment, bullying, cyber bullying** or **workplace violence**;
- Participated in an investigation, proceeding or hearing under this **policy** or any applicable **complaint** process; or
- Sought information or exercised a right under applicable law with respect to **discrimination, harassment, bullying, cyber bullying**, or **workplace violence**.

3.3. Personnel and Supervisors' Commitments

AltaGas expects that all individuals will do their part to ensure that the **workplace** is respectful.

All **personnel** agree to:

- Not engage in **discrimination, harassment, bullying, cyber bullying, workplace violence** or other disrespectful, inappropriate or offensive behaviour;
- Report any instances they reasonably believe to be **discrimination, harassment, bullying, cyber bullying**, and **workplace violence**, whether they were the target or a witness;
- Err on the side of caution if uncertain whether an incident involves **discrimination, harassment, bullying, cyber bullying**, or **workplace violence** and report the incident in accordance with this **policy**; and
- Cooperate with investigations and provide any details of incidents they have experienced or witnessed.

In addition, **AltaGas** requires that **personnel** maintain the confidentiality of any investigative process.

Supervisors/Managers also agree to:

- Notify Human Resources immediately (or refer to a more senior leader if deemed appropriate) to deal with all reports of alleged **discrimination, harassment, bullying, cyber bullying**, and/or **workplace violence** that are brought to their attention or incidents personally observed. Under no circumstances should a **complaint** be dismissed or downplayed without appropriate action being taken; and

- Seek assistance and guidance from the appropriate senior management or Human Resources **personnel** in taking appropriate action under this **policy**.

Nothing in this **policy** prevents **personnel** from seeking other external remedies, including those under applicable law or statute, including any applicable human rights legislation.

4. DEFINITIONS

In this **policy**, the following terms are used and described below:

“**AltaGas**” or “**we**” means AltaGas Ltd. and includes its subsidiaries and affiliates.

“**bullying**” means, unless otherwise defined by applicable law, any inappropriate conduct or comment towards any individual that the actor knows or reasonably ought to know would cause the individual to be physically, psychologically or emotionally humiliated or intimidated. **Bullying** may arise from a single incident or from a series of incidents, depending on the severity of the behaviour.

Bullying includes, but is not limited to, the following:

- verbal aggression, threatening gestures, insults or calling an individual derogatory names;
- vandalizing or sabotaging the personal belongings or work equipment of an individual;
- spreading malicious gossip or rumours about an individual;
- engaging in harmful or offensive hazing practices;
- physical assault or verbal threats (this could also constitute “**workplace violence**”);
- personal attacks based on an individual’s private life and/or personal traits;
- humiliating and intimidating comments or gestures;
- engaging in targeted social or professional isolation, including but not limited to, purposefully withholding necessary information or access to meetings or other opportunities without legitimate business reasons; and
- engaging in, or assisting or encouraging, any of the above using computer or other electronic communication devices, whether by means of social networks, text messaging, instant messaging, websites, electronic mail, voicemail, or otherwise.

Bullying does not include reasonable actions taken by a manager or supervisor to address an individual’s job performance or **workplace** conduct.

“**complaint**” means a complaint under this **policy** relating to an act of **discrimination, bullying, harassment, sexual harassment or workplace violence**.

“**cyber bullying**” means **bullying** behavior that takes place through the use of computers, cellphones or other electronic devices, including, but not limited to the following:

- Sending unsolicited and/or threatening e-mail;
- Encouraging others to send an individual unsolicited and/or threatening e-mail or to overwhelm an individual with e-mail messages;
- Sending viruses by e-mail (electronic sabotage);
- Spreading rumors;
- Making defamatory comments about an individual online;
- Sending negative messages directly to an individual;
- Impersonating an individual online by sending an inflammatory, controversial or enticing message which causes others to respond negatively to an individual;
- Harassing an individual during a live chat;

- Leaving abusive messages online, including social media sites;
- Sending an individual pornography or other graphic material that is knowingly offensive; and
- Creating online content that depicts an individual in negative ways.

“**discrimination**” means any form of unequal treatment, whether that treatment imposes extra burdens or denies benefits, based on a **protected ground**. **Discrimination** may be intentional or unintentional, and may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging a person on the basis of a **protected ground**.

“**harassment**” means conduct or comments, whether verbal, written or physical in nature, that a) a reasonable person would consider unwelcome or offensive, b) has the purpose or effect of unreasonably interfering with an employee’s ability to perform his or her job, or c) adversely affects an individual’s employment opportunities. **Harassment** may arise from a single incident or from a series of incidents, depending on the severity of the behaviour. **Harassment** includes **sexual harassment**. Behaviours need not be directed at any one individual in order to be considered **harassment** if such behaviours create an intimidating, offensive or hostile work environment. Behaviours need not be intentional to constitute **harassment**. Examples of **harassment** may include, but are not limited to:

- making remarks, jokes or innuendos related any **protected ground** or which are otherwise unwelcome or offensive;
- displaying or circulating offensive pictures, derogatory or demeaning posters, cartoons, graffiti or materials, whether in print form or via e-mail or other electronic means;
- singling out an individual or humiliating, demeaning, or “teasing” an individual; or
- ridiculing an individual because of dress, language or other characteristic that is related to any **protected ground**.

“**personnel**” means, in relation to **AltaGas**, all directors, officers, employees, contingency workers, contractors, consultants, employees of contractors or consultants and students representing **AltaGas** or engaged in **AltaGas’** business or social activities or present in the **workplace**.

“**policy**” means this Respectful Workplace Policy.

“**protected ground**” means any characteristic protected by applicable law which may include race, colour, religious belief, national origin, ethnicity, ancestry, age, gender/sex, marital status, physical disability, mental disability, sexual orientation, or other protected class. A **protected ground** may also be referred to as a protected trait or protected characteristic.

“**sexual harassment**” is a form of **harassment** that may include:

- unwelcome remarks, jokes or innuendoes about gender, gender identity, gender expression, sex or sexual orientation;
- unwanted comments or questions about an individual’s personal or sex life;
- refusing to work with others because of their gender, gender identity, gender expression, sex or sexual orientation;
- displaying or distributing sexually explicit or otherwise offensive material through print or electronic media;
- derogatory or degrading comments about a person’s body;
- leering or other offensive or sexually aggressive gestures;
- unwelcome advances, invitations or propositions of a sexual nature;

- advances, invitations or propositions of a sexual nature, which might, on reasonable grounds, be perceived as placing a condition on a person’s future employment, assignments or opportunity for promotion or training;
- making or threatening reprisals for refusing sexual advances; or
- unwanted physical contact or verbal abuse or threats of a sexual nature.

“**workplace**” means all **AltaGas** premises and any other location where **personnel** engage in company business, activities or social events where the conduct of an individual may have an effect on the workplace or workplace relations, and may extend to social media activities. This **policy** is applicable in all jurisdictions in which **AltaGas** operates and is subject to applicable law in such jurisdictions.

“**workplace violence**” means any threatened, attempted or actual conduct that causes or is likely to cause physical or psychological injury or harm to an individual and may include:

- the use of physical force against or by an individual that causes or could cause physical or psychological injury. This includes physical acts such as punching, hitting, kicking, pushing, damaging property or throwing objects;
- the attempted use of physical force against or by an individual that could cause physical or psychological injury;
- an action or statement (or series of actions or statements) reasonably believed to be a threat of physical or psychological harm or a threat to safety or security in the **workplace**;
- bringing a weapon of any kind to the **workplace** or possessing a weapon of any kind while carrying out company business (except as is specifically required for the performance of an individual’s duties), threatening to bring a weapon to the **workplace**, or any behaviour or action in violation of, or not excused under, the applicable AltaGas **Weapons-Free Workplaces** policy; or
- domestic or sexual violence.

ADMINISTRATION

Effective Date:	July 1, 2019
Old Document Number:	Replaces “Harassment and Workplace Violence” Policy
Date Last Reviewed:	July 27, 2021
Policy Owner:	Chief Administrative Officer
Responsible Business Unit:	Human Resources

Amendments to this policy, other than those of an administrative nature, require Board approval.

REFERENCES AND RELATED DOCUMENTS

- Respectful Workplace Policy Procedures and Guidelines
- Weapons-Free Workplaces Policy
- Diversity Policy
- Diversity Policy – Board of Directors

WGL Holdings and Washington Gas

- 1000, WGL Policy Against Discrimination, Harassment or Retaliation
- 1001, WGL Zero Tolerance Policy Prohibiting Workplace Violence and Weapons
- 1006, Washington Gas Ombudsman Policy
- 22,900, WGL Holdings Social Media Policy
- WGL Equal Employment Opportunity (EEO) Cascade Documents

ENSTAR Natural Gas Company

- 4004-80-C, Harassment – including Sexual Harassment
- 4004-79-A-C, Diversity
- 4004-138-A-C, Social Media
- 4004-139-A-C, Social Media Guidelines

SEMCO Energy Gas Company

- 90-43 – Open Door Communication Policy
- 9-51 – Recruitment and Staffing Policy
- 90-75 – Workplace Security Policy
- 90-78 – Social Media Policy
- 90-80 – Anti-Harassment and Non-Discrimination Policy
- 90-85 – Anti-Retaliation Policy
- 90-89 – ADA/ADAAA Policy

REVISION CONTROL

Date	Revision	Effective: