



Title:	Human Rights and Anti-Harassment Policy		
Department:	HR/Corporate	Document No:	ECC-POL-COR-008 Rev 0
Author:	Santosh Prabha	Approval Date:	January 26 th , 2024
Approved by:	Zulf Karim	Effective Date:	February 9 th , 2024

Policy

House of Metals Company Ltd. and its subsidiaries (collectively, “Eccomelt” or the “Company”) is committed to providing a work environment that is free from discrimination, harassment, and reprisals in support of the dignity, self-esteem and productivity of every employee. As such, Eccomelt does not condone workplace harassment, sexual harassment, or discrimination of, or by any of its employees. A violation of this policy will be grounds for disciplinary action up to and including termination.

Eccomelt requires all employees to uphold the provisions for equal treatment in employment, without discrimination as defined in the ‘prohibited grounds of discrimination’ outlined under the applicable provincial legislation.

Eccomelt will treat any complaint of workplace discrimination and/or harassment as a serious matter. All complaints of discrimination or harassment will be investigated and handled in a confidential manner except where disclosure is necessary to conduct an investigation, or as required by law. Any retaliation or reprisals, against individuals who have filed a complaint, are subject to immediate disciplinary action, up to and including termination.

This policy as guided by the UN guiding principle on Human Rights, applies to all applicants, employees and contractors whether related to conduct engaged in by fellow employees or someone not directly connected to Eccomelt (e.g. an outside vendor, consultant or customer) and applies in all locations where an employee is engaged in employer sponsored activities.

Eccomelt has established a Workplace Harassment Program (see below) to reduce the risk of harassment and/or discrimination in the workplace. This program includes a procedure outlining how incidents of workplace harassment are reported, investigated and dealt with along with a procedure for training workers.

This policy shall be reviewed as often as necessary but no less than every year to ensure that it adequately supports on-going behavioural expectations.

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Definitions

"**Workplace**" means the work-related environment (Eccomelt office's and any other location where Eccomelt business is taking place) and/or where employees have congregated as part of their employment. It includes but is not limited to, the physical work premises, work-related social functions, assignments outside Eccomelt' locations, work-related travel and work-related conferences or training sessions.

"**Harassment**" is broadly defined as any unsolicited, unwelcome, disrespectful or offensive behaviour that typically has an underlying sexual, ethnic or racial connotation. There are two main types of harassment that may be defined as follows:

a) "Workplace Harassment" means:

- engaging in a course of vexatious comment or conduct against a worker in the workplace that is known or ought reasonably to be known or to be unwelcome.
- harassment in the workplace based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, age, record of offences, marital status, family status, or disability is prohibited in the workplace.

b) "Sexual Harassment" means:

- engaging in a course of vexatious comment or conduct against a worker in the workplace because of sex, sexual orientation, gender identity or gender expression, when the course of comment or conduct is known or ought reasonably to be known or to be unwelcome.
- Making a sexual solicitation or advancement where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker and the person knows or ought reasonable to know that the solicitation or advance is unwelcome.

"**Discrimination**" means improper differential treatment in the workplace related to any of the prohibited grounds of discrimination as outlined under provincial legislation.

Harassment can take many forms such as:

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- Remarks of a sexual nature that are intended to embarrass.
- Inappropriate jokes with sexual overtones or about a person’s body or attire;
- Refusing to converse or work with an employee because of his or her racial, ethnic background or any other protected ground of discrimination;
- Insulting gestures or jokes based on sexual, racial, ethnic or other personal characteristics which cause embarrassment or awkwardness;
- Threats, intimidation or retaliation;
- Displaying offensive pictures or photographs or other offensive materials;
- Unwelcome physical contact such as touching, patting or brushing against;
- Sexual or physical assault.

Responsibilities

Employees are responsible for taking steps to reduce risk of workplace harassment and/or discrimination.

Management is responsible for providing a workplace free of harassment and/or discrimination. Any complaints will be dealt with promptly and professionally in accordance with the Workplace Harassment Program.

Employees are expected to inform their Manager of any incident of harassment or discrimination directed at, or observed by them, and to cooperate in any investigation related to workplace harassment and/or discrimination.

Please note that normal management of employees including, but not limited to, counseling, performance management, disagreements between parties, work assignments and the implementation of disciplinary action, is not considered a form of harassment or discrimination.

Any individual who believes they have been subjected to harassment or discrimination is requested to confront the alleged harasser, where possible or report the incident to Management. Complaints will be investigated promptly and in accordance with the Workplace Harassment Program outlined below.

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Workplace Harassment Program

Internal Reporting and Investigation Procedure

It is the responsibility of Eccomelt through its Management to ensure that harassment and/or discrimination incidents are investigated thoroughly and promptly, and that the internal complaint procedure is followed.

A summary of the procedure is outlined below.

- An individual who feels that they are being harassed or discriminated against should address the issue immediately given that delays often make the process more difficult. Wherever possible, the individual filing the complaint should try to confront the alleged harasser and ask the person to stop the behaviour.
- Alternatively, they may notify either their manager and/or Human Resources of the complaint. The individual should keep a record and document all details about the incident (*e.g.*, dates, times, locations, witnesses, *etc.*).
- Complaints will be treated as confidential and Eccomelt will not, without consent, disclose the name of the complainant or the circumstances, to any person except where an investigation requires Eccomelt to do so, or as required by law.
- Management will be responsible for conducting an investigation under the policy unless this causes a conflict of interest, in which case an independent investigator may be retained.
- Management will take the following steps during the investigation:
 1. Obtain information from the complainant, the respondent and other witnesses as appropriate;
 2. Provide the respondent with an opportunity to provide a response to all of the specific facts alleged in the complaint, and any additional facts gathered during the investigation that may constitute a breach of this policy and/or law before making a final decision;
 3. Notify Senior Management of the progress of the investigation;
 4. Consult with legal counsel as necessary to the properly conduct of the investigation.



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Once the investigation is complete, the investigator will prepare a report of the findings and recommendations. The report will confirm if there has been a violation of the policy and/or law. A summary of the findings will also be reviewed with the parties.

If the Management team believes there is a violation of the policy, it will take such action as it deems appropriate to restore a work environment free from discrimination and harassment.

Resolution Procedure

The Company will take the necessary action(s) to ensure a workplace free of harassment and/or discrimination. If a finding of harassment and/or discrimination is made, the resulting corrective action will take into consideration the severity of the conduct in imposing the appropriate discipline in the circumstances up to and including termination of employment.

It should be noted that, regardless of the outcome of a complaint made in good faith, the individual lodging the complaint, as well as anyone providing information, will be protected from any form of retaliation and/or reprisal by co-workers. Alternatively, since allegations made in bad faith can have serious implications on innocent individuals, the abuse of the policy or the making of frivolous allegations will not be tolerated and will result in disciplinary action.

Employees are encouraged and have the right to contact their immediate supervisor and/or the corporate management anonymously if the concerns have not been resolved.