



Title:	Workplace Anti-Violence Policy		
Department:	HR/Corporate	Document No:	ECC-POL-COR-009 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 the prevention of workplace violence and will take whatever steps are reasonably necessary to protect its employees from workplace violence from all sources. Workplace violence includes, but is not limited to, unwanted physical and written contact (including email), intimidating, threatening, or hostile behaviour, physical abuse, vandalism, arson, sabotage, and use of weapons, domestic violence, or any other act which is inappropriate to the workplace.

Violent behaviour in the workplace is unacceptable. This Policy applies to everyone on the premises of all Eccomelt locations, including visitors and customers. Everyone is expected to uphold this policy and to work together to prevent workplace violence.

If Eccomelt becomes aware that domestic violence would likely expose an employee to physical injury in the workplace, the employer shall take every precaution reasonable in the circumstances for protection of the employee. Eccomelt will not engage in or ignore violent, threatening, intimidating or otherwise disruptive behaviors.

The Workplace Violence Program includes measures and procedures to protect employees from workplace violence, a means of summoning immediate assistance and a process for employees to report incidents or raise concerns. Eccomelt will ensure this policy and the supporting program are implemented and maintained and that all employees have the appropriate information and instruction to protect them from violence in the workplace.

Management will adhere to this policy and the supporting program. The Management team is responsible for ensuring that the measures and procedures are followed by employees and that employees have the information they need to protect themselves.

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Definitions

“Workplace” is defined as the work-related environment (e.g., Eccomelt offices 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.

“Workplace Violence” is defined as:

- The exercise of physical force by a person, in a workplace, that causes or could cause physical injury to an employee;
- An attempt to exercise physical force against an employee, in a workplace, that could cause physical injury to the employee; or
- A statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, in a workplace, that could cause physical injury to the employee.

Workplace Violence Program

It is the responsibility of Eccomelt, through its Managers to ensure that potential risks are properly controlled in the workplace; employees understand how to call upon immediate assistance in the event of workplace violence or threats of violence; incidents of workplace violence or threats of violence are properly reported and that there is an investigation and resolution process set in place.

Eccomelt employees are responsible for reporting to Management any incident where an employee is subjected to, witnessed, or has knowledge of workplace violence or has reason to believe that workplace violence may occur. They may remove themselves from the situation but must remain in a safe place as close as reasonably possible to the workstation until the investigation is completed.

If the incident of workplace violence or threat of violence is serious, law enforcement may be notified.



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All 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.

Once complaints are reported, Management will be responsible for conducting investigations under this Policy, and will take the following steps during the investigation:

1. Obtain information (how, when, where, etc.) from the complainant, the respondent and other witnesses as appropriate;
2. Provide the respondent with an opportunity to provide a response to all 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 Eccomelt senior management of the progress of the investigation;
4. Consult with legal counsel as necessary to the proper conduct of the investigation.

Once the investigation is complete, Management 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.

If the findings demonstrate a violation of the policy, Eccomelt will take such action as it deems appropriate to restore a work environment free from violence.

Eccomelt is focused on providing both new and existing employees mandatory education session to ensure all individuals understand the contents of the policy. Employees are not to suffer negative consequences for reporting an incident of violence.

The Company pledges to investigate and deal with all incidents and complaints of workplace violence in a fair and timely manner, respecting the privacy of all concerned as much as possible.