



WORKPLACE HARASSMENT POLICY

POLICY STATEMENT

U2 Fasteners is committed to providing a work environment in which all employees are treated with dignity and respect. Workplace harassment will not be tolerated, and all employees have the right to work free from harassment, intimidation, or offensive conduct.

This policy is an addendum to the U2 Fasteners Health and Safety Policy and Employment Policy and is intended to meet the requirements of the Ontario Occupational Health and Safety Act.

DEFINITION OF WORKPLACE HARASSMENT

Workplace harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome. This includes workplace sexual harassment.

Workplace sexual harassment includes:

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

REASONABLE ACTIONS

Reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace, including performance management, discipline, or work assignments, does not constitute workplace harassment.

APPLICATION

This policy applies to all employees and to all persons on company premises or conducting business on behalf of U2 Fasteners, including visitors, customers, contractors, subcontractors, and suppliers.

ROLES AND RESPONSIBILITIES

Supervisors and managers are responsible for:

- Upholding and enforcing this policy;
- Responding promptly to incidents or complaints;
- Ensuring employees are aware of this policy.



Employees are responsible for:

- Conducting themselves in a respectful manner;
- Reporting incidents of harassment they experience or witness.

REPORTING HARASSMENT

Employees who believe they have been subjected to workplace harassment are encouraged to report the incident as soon as possible to:

- Their supervisor or manager;
- A member of senior management.

Reports may be made verbally or in writing. There will be no retaliation against any employee who reports harassment or participates in an investigation in good faith.

INVESTIGATION

All incidents and complaints of workplace harassment will be investigated in a timely, fair, and confidential manner, to the extent possible. Appropriate corrective action will be taken where harassment is substantiated.

CONFIDENTIALITY

Information obtained during an investigation will be shared only as necessary to investigate the complaint or take corrective action, or as required by law.

ENFORCEMENT

Violations of this policy may result in disciplinary action, up to and including termination of employment, in accordance with applicable law.

REVIEW

This policy will be reviewed periodically and updated as required.

Approved by: Swen Ruhmann, CEO

Effective Date: January 14, 2026

Last Reviewed / Revised: January 14, 2026