CANADA MEDIA FUND FONDS DES MÉDIAS DU CANADA

Anti-Harassment, Discrimination, and Workplace Violence Policy

Effective Date:	June 20, 2025
Approved by:	Board of Directors
Annually	
Last Review:	June 20, 2025
Next Review:	June 2026
Governed by:	Code of Business Conduct

1. SCOPE

This Policy applies to:

- All Canada Media Fund ("CMF") employees, including full-time, part-time, contract, temporary staff and Board members (**"**CMF Associates**"**);
- Volunteers, independent contractors, vendors, business associates, and clients interacting with CMF Associates.

The Policy applies to all work-related incidents, whether at work or in a work environment, including telecommuting or outside the workplace, as well as during and outside normal working hours (e.g. during business trips, conferences, off-site locations, business travel, digital communication platforms, meetings, receptions and social events).

The Policy also applies to communications by any means, technological or otherwise (e.g. social media, e-mail, text messaging, posters, letters, virtual meetings etc.).

2. POLICY STATEMENT

The CMF is committed to fostering a safe, inclusive, and respectful workplace for all CMF Associates. The Anti-Harassment, Discrimination, and Workplace Violence Policy (the "**Policy**") is intended to affirm CMF's commitment to fostering a work environment that promotes dignity and self-esteem in a climate of mutual respect, collaboration, and understanding. This commitment includes maintaining a workplace free from all forms of harassment, thereby protecting the physical and psychological integrity of CMF Associates and safeguarding their dignity, in order to prevent and/or put an end to psychological and sexual harassment within the organization, including all forms of discriminatory harassment. It also aims to establish the principles of intervention that the organization will apply when a complaint of harassment is filed or when harassment is reported to the employer or the duly designated representative.

ZERO TOLERANCE: CMF does not tolerate discrimination, harassment, bullying, or workplace violence in any form. This Policy ensures compliance with all applicable provincial and territorial occupational health and safety laws and human rights legislation while supporting a workplace culture of professionalism and mutual respect.

3. OBJECTIVES

Without limiting the generality of the foregoing, the objectives of the Policy are as follows:

- Maintain a work environment free from harassment, discrimination, and violence;
- Establish a work environment where all CMF Associates are treated with dignity and respect;
- To prevent all forms of harassment, while proactively addressing behaviours and conditions that could lead to harassment;
- Make CMF Associates aware of the different forms of harassment, including psychological, sexual and discriminatory harassment, and their impact;
- Clearly state the organization's intolerance of all forms of harassment;
- Offer resources, advice and support to CMF Associates who are victims of harassment;
- Guarantee the privacy of all parties involved in harassment complaints;
- Establish a fair, transparent and effective procedure for reporting and handling harassment complaints;
- Encourage informal resolution where appropriate while ensuring a formal complaint process is always available.
- Protect from retaliation those who report harassment or participate in investigations;
- Respond to all complaints seriously, fairly, and in a timely manner.
- Ensure compliance with the highest applicable legal standards governing workplace conduct and safety in each jurisdiction.

4. COMMITMENT TO COMPLIANCE WITH PROVINCIAL LAWS

CMF recognizes that legal requirements for workplace harassment, discrimination, and violence prevention may vary across provinces and territories. CMF will:

- Adhere to the highest applicable legal standard in any jurisdiction where CMF Associates work;
- Assess workplace violence risks as required under occupational health and safety laws;
- Ensure all complaints are investigated in accordance with applicable human rights and workplace safety laws;
- Provide mandatory training that aligns with jurisdictional requirements for harassment, discrimination, and workplace violence prevention.

5. DEFINITIONS

5.1 Discriminatory Harassment

Discriminatory harassment may be based on race, color, nationality, social origin, language, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, age, religious or political beliefs, citizenship or nationality, criminal record (in jurisdictions where protected), disability (physical, mental, developmental, or learning disabilities, including addiction-related disabilities), or the exercise of a protected right recognized under human rights laws.

Here are some examples, not exhaustive, of behaviours or comments that may constitute discriminatory harassment:

- Making racial slurs or ethnic jokes;
- Mocking someone's accent, name, or cultural background;
- Making sexist jokes or commenting inappropriately on someone's appearance;
- Displaying offensive symbols;
- Criticizing or mocking religious attire;
- Joking that someone is "too old" or "too young" for the job;
- Spreading rumors or making assumptions about someone's sexual orientation.

5.2 Psychological Harassment

Psychological harassment in the workplace is vexatious (abusive, humiliating, hurtful) conduct in the form of comments, gestures or behaviour that are repeated, are hostile (aggressive, threatening) or unwelcome, adversely affect the person's dignity (that is, self-respect, self-esteem) or integrity(physical, psychological or emotional balance) and make the workplace harmful for the person. A single serious incident of such behaviour could also be considered harassment if it has a lasting negative impact on the person.

Here are some examples, not exhaustive, of behaviours or comments that may constitute abuse or psychological harassment:

- Bullying, cyberbullying;
- Blackmail;
- Coercion;
- Insults, derogatory remarks, offensive jokes or persistent criticism designed to undermine a person's trust;
- Making threats, using aggressive language or creating a sense of fear; Cyberbullying;
- Spreading rumors, sabotaging someone's work or taking credit for someone's accomplishments;
- Unwanted physical contact, gestures or actions likely to cause harm or discomfort;
- Criticizing or ridiculing someone in front of colleagues or others.
- Sharing inappropriate jokes, images or comments of a sexual nature;
- Comments or actions based on race, gender, religion, disability or other protected characteristics; and/or
- Sending harassing emails or messages or using social media to target an individual.

Here are some examples, not exhaustive, of behaviours or comments that do **NOT** constitute abuse or psychological harassment:

- Advice, appraisals of contribution and disciplinary measures that sanction a breach;
- Conflict between CMF Associates;
- Difficult work constraints;
- The normal exercise of management rights by existing CMF Associates and/or the employer.

5.3 Sexual Harassment

Sexual Harassment is a form of harassment involving behaviour of a sexual nature. It is defined as any offensive or humiliating behaviour related to a person's sex, as well as any behaviour of a sexual nature that creates an intimidating, embarrassing, hostile or offensive environment.

Here are some examples, not exhaustive, of behaviours or comments that may constitute sexual harassment:

- Repeated acts, comments or gestures of a sexual nature;
- Conduct that may, on reasonable grounds, be interpreted as subordinating a person's employment or opportunities for employment or advancement to conditions of a sexual nature.
- Unwelcome questions or discussions about a person's sex life;
- Pressure to obtain sexual favors.

5.4 Workplace Violence

Workplace violence includes the use of physical force, an attempt to use physical force, or a threat to use physical force that causes harm, intimidation, or fear. It also includes deliberate destruction of property.

Here are some examples, not exhaustive, of workplace violence:

- Hitting, or physically threatening a coworker;
- Throwing objects, slamming doors, or deliberately damaging company or personal property in anger;
- Sending threats of harm in person, over the phone, or electronically.

5.5 Cyber Harassment & Digital Misconduct

Cyber harassment includes unwanted, and harmful behaviour conducted through digital or electronic means—such as emails, text messages, social media, or other online platforms—with the intent or effect of intimidating, threatening, humiliating, or otherwise harming an individual’s dignity, mental well-being, or safety. It can include threats, stalking, spreading false information, sharing private images without consent, or persistent unwanted contact.

Here are some examples, not exhaustive, of behaviours or comments that may constitute cyber harassment:

- Cyberbullying – Repeatedly sending harassing or intimidating messages through digital communication;
- Doxxing – Publicly sharing private or identifying information about a coworker online without their consent, such as home addresses or phone numbers, to intimidate or harass them;
- Threats or Intimidation – Sending messages containing threats of harm, blackmail, or explicit intimidation;
- Online Defamation – Spreading false, damaging statements about a colleague through social media, email, or workplace messaging platforms;
- Digital Exclusion – Intentionally excluding a coworker from important work-related group chats, meetings, or email threads to isolate or undermine them;
- Cyberstalking – Repeatedly monitoring a colleague's online activity, excessive messaging, or using digital tools to track their movements without legitimate reason;
- Deepfake or Manipulated Content – Altering images, videos, or documents to misrepresent a colleague's actions or statements with the intent to harm their reputation.

6. Roles and Responsibilities

To ensure the effective implementation of the Policy, the following roles and responsibilities are established:

6.1 Employer Responsibilities (CMF Leadership & Human Resources)

- Foster a workplace culture that is safe, inclusive and free from harassment, discrimination and violence;
- Develop, implement and review this Policy annually to ensure continued compliance with applicable laws and best practices;
- Conduct workplace risk assessments as required by occupational health and safety laws in each jurisdiction where CMF operates;
- Establish and communicate clear reporting procedures for complaints;
- Investigate all complaints promptly, fairly and confidentially, engaging external investigators when required;
- Ensure there is no retaliation against complainants, witnesses or individuals involved in investigations;
- Take appropriate corrective action, including disciplinary measures, up to and including dismissal if warranted, against individuals who violate this Policy.

6.2 Supervisor Responsibilities

- Lead by example by fostering a culture of respect, inclusion, and professionalism;
- Monitor the work environment for signs of harassment, discrimination, or workplace violence, intervening early to prevent escalation;
- Respond immediately and appropriately to complaints or concerns about workplace misconduct;
- Ensure CMF Associates understand CMF's policies and procedures and their rights under human rights and occupational health and safety laws;
- Document and report any concerns or complaints to Human Resources or senior leadership to ensure appropriate handling;
- Maintain confidentiality during any complaint process and cooperate fully with investigations.

6.3 CMF Associates Responsibilities

- Treat all colleagues, contractors, and stakeholders with dignity, respect, and professionalism;
- Familiarize themselves with and comply with CMF's policies on harassment, discrimination, and workplace violence;
- Report any incidents of harassment, discrimination, or workplace violence that they experience or witness without delay;
- Cooperate fully and confidentially in workplace investigations;
- Participate in mandatory training on workplace harassment, discrimination, and violence prevention;
- Refrain from any type of retaliation against individuals involved in a complaint or investigation;
- If safe to do so, attempt informal resolution of minor issues before escalating complaints formally.

This section ensures that all members of CMF understand their responsibilities in maintaining a respectful and legally compliant workplace. Supervisors and CMF Associates will be held accountable for upholding these standards to create a safe and inclusive working environment.

7. Complaint Reporting and Investigation Process

7.1 Informal Resolution Options

CMF Associates who believe they have suffered or witnessed harassment may:

- Communicate this to the person who has committed the alleged harassment and ask them to stop the behaviour, words or actions;
- Request assistance from HR to facilitate an informal resolution; and/or
- Use CMF's assistance resources for guidance.

Informal resolution is voluntary and not required before filing a formal complaint.

7.2 Filing a Complaint

CMF Associates who believe they have suffered or witnessed harassment may also file a Formal Complaint. The complaint must be disclosed to:

- Human Resources; and/or
- CMF's anonymous reporting platform, where legally permitted; and/or
- The Chair of the Governance & Human Resources Committee if the complaint involves senior leadership.
- The EVP Finance and Analytics if the complaint involves Human Resources

Disclosures of harassment may be made verbally at first, but must then be made in writing in order to be processed formally. The complaint should be filed as soon as possible after the last manifestation of harassment.

The complaint should include:

- A description of the incident(s), including dates, times, and locations;
- Names of witnesses (if applicable);
- Supporting evidence, such as emails, text messages, or relevant documents.

7.3 Investigation Process and Confidentiality

- All complaints of workplace harassment, discrimination, and violence must be investigated;
- Investigations will be conducted promptly, impartially, and confidentially;
- CMF Associates will be informed of the outcome in writing (in compliance with applicable legal requirements);
- CMF may engage external investigators where appropriate to ensure impartiality.

8. Protection Against Retaliation

CMF strictly prohibits retaliation against any individual who:

- Reports concerns in good faith;
- Participates in an investigation.

Any act of reprisal, whether direct or indirect, will be treated as a serious violation of this Policy and may result in disciplinary measure up to and including dismissal.

9. Training and Policy Acknowledgement

CMF is committed to preventing workplace harassment, violence and discrimination through:

- Providing mandatory training on harassment, violence and discrimination prevention;
- Promoting diversity, equity, inclusion and accessibility in the workplace;
- Establishing clear lines of communication to report harassment or discrimination.

All CMF Associates must:

- Acknowledge receipt and understanding of this Policy upon hire and after updates;
- Complete mandatory training on harassment, discrimination, and workplace violence prevention;
- Report violations and cooperate with investigations in good faith.

CMF will ensure that training aligns with the specific requirements of each province where CMF Associates work.

Adherence to this Policy is a condition of employment at CMF. All CMF Associates must acknowledge receipt of this Policy and declare that they understand and freely accept its terms by signing the Acknowledgement of Receipt.

10. Accessibility and Language

This Policy is available in both French and English. Upon request, it will be provided in alternate formats to accommodate accessibility needs.