

HARASSMENT, DISCRIMINATION AND WORKPLACE VIOLENCE POLICY

_____ (the “**Employer**”) is committed to the establishment and maintenance of a healthy work environment for its employees and those of its subsidiaries, free of Harassment, Discrimination and Violence. This Policy has been approved by the Employer’s equity partner, Edge Natural Resources LLC.

1. Purpose of Policy

This Harassment, Discrimination and Workplace Violence Policy (the “**Policy**”) is intended to prevent Harassment, Discrimination or Violence with respect to Employees, customers and suppliers of the Employer, and outlines the procedures that the Employer will follow in response to allegations of conduct contrary to this Policy. Harassment, Discrimination and Violence in the Workplace is illegal and will not be tolerated by the Employer.

2. Scope and Application of this Policy

This Policy applies to all Employees at the Workplace.

3. Definitions

Where used in this Policy:

“**Discrimination**” means any act or omission, whether intentional or not, which has the effect of denying benefits to, or otherwise disadvantaging, an Employee in the course of his/her employment on the basis of a Protected Ground.

“**Employee**” means any employee (including full and part-time, casual, permanent and temporary employees), manager, contractor, subcontractor, officer and director of the Employer.

“**Harassment**” means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by an Employee that the Employee knows or ought reasonably to know will or would cause offence or humiliation to another person, or adversely affects the other person’s health and safety, and includes:

- (i) conduct, comment, bullying or action on the basis of a Protected Ground; and
- (ii) Sexual Harassment.

“**Protected Ground**” includes race, religious beliefs, color, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation.

“**Sexual Harassment**” includes any unwanted sexual advance, request for sexual favours, or other verbal, written or physical contact of a sexual nature which threatens job security, affects advancement opportunities or negatively impacts on the working conditions or employment atmosphere in which any Employee works.

“**Violence**” means the threatened, attempted or actual conduct of an Employee that causes or is likely to cause physical or psychological injury or harm to another person, and includes domestic or sexual violence.

“**Workplace**” includes any location at which an Employee performs duties, including an office, shop or worksite of the Employer, any worksite where Employees perform duties,

any vehicle used by an Employee in the performance of duties, and any place where work-related social, business or other functions occur where the conduct or comments of Employees may have an effect on the workplace or workplace relations.

4. Examples of Harassment and Violence

Harassment includes:

- verbal or physical abuse, threats, derogatory remarks, jokes, innuendo or taunts related to a Protected Ground;
- the display of or distribution by mail, fax, social media or other electronic means of racist or offensive images based on a Protected Ground; and
- unwelcome invitations or requests, whether indirect or explicit.

Harassment does not include any reasonable conduct of the Employer, a manager or supervisor that is part of their normal work function and would not normally be considered workplace harassment, including:

- changes in work assignments;
- scheduling;
- performance assessments and evaluation; and
- disciplinary action.

Violence includes:

- threatening behavior, such as shaking fists, destroying property or throwing objects;
- verbal or written threats (any expression of intent to cause harm); and
- physical attacks such as hitting, pushing or kicking.

5. Responsibilities and Expectations under this Policy

The Employer's directors, officers, managers and supervisors are expected to:

- administer this Policy and ensure this Policy is applied in a timely, consistent and confidential manner;
- foster a work environment which is free from Harassment, Discrimination or Violence, and set an example about appropriate behavior in the Workplace;
- communicate the process for investigating and resolving Harassment, Discrimination or Violence complaints;
- address all Harassment, Discrimination or Violence incidents immediately upon becoming aware of them, whether or not a Harassment, Discrimination or Violence complaint has been made;
- take appropriate action during a Harassment, Discrimination or Violence investigation, including the determination of whether or not allegations of Harassment, Discrimination or Violence are substantiated;
- determine what corrective action is appropriate where a Harassment, Discrimination or Violence complaint has been substantiated; and
- ensure Harassment, Discrimination or Violence situations are dealt with in a sensitive and confidential manner.

Employees are expected to:

- read, understand and comply with this Policy;
- treat others with dignity and respect;

- report any incident of Harassment, Discrimination or Violence (whether observed or experienced personally) to the persons identified in this Policy; and
- cooperate with a Harassment, Discrimination or Violence investigation and to respect the confidentiality of the investigation process.

6. Workplace Harassment, Discrimination and Violence Complaints

- (i) **Complaints in relation to Workplace Harassment or Discrimination:** If an Employee has been the subject of or has witnessed Harassment or Discrimination, the Employee is encouraged to immediately discuss their concerns with the individual who has allegedly committed the Discrimination or Harassment, make their disapproval and/or unease known in a clear, direct and firm manner, and tell the individual to cease the Discrimination or Harassment immediately. If the Employee is not comfortable doing so, or has tried this approach and the behavior has not stopped, complaints should be directed to the Employee's immediate supervisor or to **[Human Resources/senior management]**. If a complaint involves the Employee's supervisor, or if the Employee fears retaliation from his/her supervisor, the Employee should raise the complaint with **[Human Resources or]** senior management immediately.

Alternatively, a complaint can be made pursuant to the Employer's Whistleblower Policy. The Whistleblower Policy allows a complaint to be made anonymously; however, the Recipients (as defined in the Whistleblower Policy) may request that the person making the complaint waive anonymity in order to properly investigate the complaint in accordance with this Policy.

- (ii) **Complaints in relation to Workplace Violence:** Employees who see or suspect instances of actual or potential Violence must immediately contact the Employee's immediate supervisor, **[the Employer's Director of Human Resources]** or any of the Employer's senior officers. In the event of a serious emergency, 9-1-1 must also be immediately contacted. An incident involving workplace Violence has the potential of causing serious injury to a person. As a result, in accordance with applicable occupational health and safety legislation, the Employer will investigate any incident of Violence in the Workplace and prepare a report which outlines the circumstances of the incident and the corrective action taken to prevent the recurrence of the incident.

7. Investigation of Workplace Harassment, Discrimination or Violence Complaints

All Workplace Harassment, Discrimination or Violence complaints will be investigated. The person making a complaint should be prepared to provide full details of the incident of Harassment, Discrimination or Violence and any potential witnesses to the incident. All investigations will be conducted by an individual who has the necessary experience and training, which may include an external consultant.

The investigator will interview the complainant, the Employee against whom the complaint was made and any witnesses who have been identified. All persons interviewed will have the right to review his/her statement to ensure its accuracy.

Following the investigation, the investigator will prepare a report which will include a description of the complaint, a summary of the information learned from all persons interviewed, and a decision regarding whether the complaint has been substantiated. The investigator's report will be provided to the individual who received the complaint pursuant to

this Policy, the complainant and the Employee against whom the complaint was made.

8. Confidentiality of Investigation

The Employer and anyone appointed by the Employer to complete the investigation will maintain confidentiality throughout the complaint procedure, the investigation, and after, to the extent practicable and appropriate under the circumstances.

Everyone else, including the complainant and person complained of, will be advised of the importance of confidentiality in maintaining the fairness and the integrity of an investigation, and the extent to which privacy and confidentiality can be critical factors in resolving a complaint in a manner fair to all parties.

Information collected during the course of an investigation will not be used or disclosed by the Employer, or anyone appointed by the Employer to complete the investigation for any purpose other than as required by law or necessary for the purpose of the investigation or the resolution of a complaint.

9. Policy Violations

A breach of this Policy will lead to corrective and/or disciplinary actions which may include, without limitation, one or more of the following:

- a formal apology;
- counselling;
- a written notice placed in the Employee's file;
- a change of work assignment of the person complained of; or
- suspension or discharge for cause.

In addition to the sanction that may be imposed by the Employer, Employees who engage in Harassment, Discrimination, or Violence in the Workplace may expose themselves personally to liability in the event of a successful lawsuit or a complaint under human rights or other applicable legislation.

10. Bad Faith Complaint

Any Employee who knowingly or recklessly makes a complaint or advances allegations of Harassment, Discrimination or Violence that are not in good faith will be subject to disciplinary action, including termination of employment for cause.

11. No Retaliation

Retaliation against an Employee who has reported an incident of Harassment, Discrimination or Violence in accordance with this Policy is prohibited, and will result in disciplinary action against any Employee who initiated or participated in any retaliation, including termination of employment for cause.

12. Review of Policy

This Policy will be reviewed on an annual basis, or as required, and will be amended or revised as required to ensure the continued fulfillment of the Policy's purpose.