

POLICY AGAINST DISCRIMINATION AND HARASSMENT

With the goal of always providing work conditions that respect the health, safety, and physical integrity of its employees, Stornoway denounces and prohibits all forms of harassment in the workplace and during work-related activities. This harassment policy is part of Stornoway's broader Human Resources policies.

The Company recognizes its employees are an important asset, and respect for others is crucial to developing and maintaining healthy labour and professional relations. The Company is committed to providing and maintaining a favourable and productive work atmosphere that respects the dignity of each of its employees, and to counter all types of discrimination or harassment to which an employee may be subject.

In light of this commitment, all employees are required to respect the dignity, self-esteem, honour and reputation of their colleagues, be they subordinates, superiors or same-level workers.

In accordance with this policy, every employee has the right to work without being harassed; the Company will not tolerate any type of harassment. Consequently, any employee whose conduct constitutes harassment will be subject to a penalty or severe administrative action up to and including termination.

▼ EXAMPLES OF HARASSMENT

The following examples of harassment are prohibited by the terms of this policy: bullying, undue pressure,

advances or demands, undesirable actions, practical jokes, names, insults, hostile or contemptuous jokes, signs, drawings, allusions or sarcastic or humiliating remarks.

▼ WHAT TO DO IF YOU BELIEVE YOU ARE A VICTIM OF HARASSMENT OR DISCRIMINATION?

Firstly, we recommended that employees who believe they are victims of harassment note the circumstances, date, and witnesses of the act of harassment or discrimination. This will allow them to remember the event and gain some perspective. Upon reflection, they may decide to either inform the person in question that their behaviour is hurtful and threatens their dignity or file a complaint directly with the head of the Company's HR department.

We recommended that anyone who feels they are being harassed attempt to resolve the situation amicably and to immediately inform their immediate superior (except when the superior is involved) of the situation and the actions they intend to take to attempt to resolve it.

However, victims can at all times file a complaint with the head of the Company's HR department, whether they try to resolve the situation amicably or not. In such a case, they should submit a written complaint (a form is available from the head of HR) describing their motives, the details of the events in question, and the items of evidence available. All written complaints are subject to a confidential investigation process.