



# EQUIFRUIT

**Policy for the  
prevention and management of  
psychological and sexual harassment**

**May 2025**

## OBJECTIVE

Equifruit is committed to promoting a harmonious working environment free from any form of harassment and is also committed to promoting respect between individuals, safeguarding dignity, and protecting the physical and psychological integrity of its employees.

Equifruit is committed to preventing and putting an end to any situation of psychological or sexual harassment related to work, including harassment from external sources.

This policy aims to indicate the means put in place to prevent harassment and to establish the procedure for handling complaints and problematic situations which are brought to the attention of Equifruit.

## APPLICATION

This policy applies to all staff, at all hierarchical levels, to external consultants and interns, and to any person associated with them (e.g. client, supplier, visitor, representative, etc.) in particular in the following places and contexts:

- Workplaces, including teleworking locations, and common areas.
- Any other place where people may be in the course of their employment (e.g. meetings, training, travel, business trips, trade fairs, etc.).
- During work-related social activities.

Interpersonal and electronic communications, received by any technological or other means (e.g., emails, social media, text messages, etc.) are also covered.

## DEFINITION

The *Loi sur les normes du travail* defines psychological harassment as follows:

*“Vexatious conduct manifested by repeated behaviour, words, actions or gestures that are hostile or unwanted, which undermines the dignity or psychological or physical integrity of the employee and which results in a harmful work environment for the employee. For greater clarity, psychological harassment includes such conduct when it manifests itself by such words, actions or gestures of a sexual nature.*

*A single serious conduct may also constitute psychological harassment if it causes such harm and produces a continuing harmful effect on the employee.”*

This definition includes harassment of a discriminatory nature linked to one of the grounds provided for in the *Charter of Human Rights and Freedoms*.

➡ We invite you to consult **Appendix 1** for more details and clarifications on this subject.

## **ZERO TOLERANCE POLICY**

Equifruit prohibits all types of harassment and discrimination, regardless of the type of harassment and discrimination (see Appendix 1 for further details).

It is everyone's responsibility to adopt behaviours that promote the maintenance of a workplace free from psychological or sexual harassment. To this end, the expectations of all staff members are as follows:

- contribute to maintaining a harassment-free workplace ;
- respect people in the context of their work;
- participate in the mechanisms put in place to prevent and put an end to harassment;
- report any harassment-related situation as soon as possible to one of the people designated to receive and handle complaints and reports.

The normal exercise of managerial or supervisory responsibilities, including the assignment of tasks, the imposition of disciplinary measures or any other measures imposed in the normal course of work or management, cannot be characterized as harassment or discrimination.

Also, other situations cannot automatically be associated with cases of harassment at work: a conflict at work between two employees, personality conflicts, work-related stress or even difficult professional constraints.

## **PREVENTION**

Equifruit is committed to taking reasonable steps to provide a work environment free from all forms of harassment in order to protect the dignity, as well as the psychological and physical integrity of individuals.

Equifruit implements measures aimed at identifying, controlling and eliminating the risks of psychological or sexual harassment, in particular by:

- Disseminate the policy in a way that makes it accessible to all staff. To this end, the policy is communicated to everyone during the onboarding process and is available at all times on SharePoint: **EQ-Documents Administration HR Employee Manual** .
- Maintaining continuous monitoring of risks and risk factors likely to generate harassment situations (see Appendix 1).
- Ensuring that this policy is understood and respected by all persons concerned.
- Promoting respect between individuals.
- Regularly raising awareness among staff about the roles and responsibilities of each person in terms of harassment prevention.
- Implementing a training and awareness program for staff and for designated officials responsible for receiving and handling complaints and reports.
- Consulting staff on specific situations in their workplace that may create conditions that could lead to harassment.
- Holding meetings with people who are leaving their jobs to find out the reasons for their departure.
- Having a diligent process for handling complaints and reports.

## HANDLING COMPLAINTS AND REPORTS

In the event that a person believes they have been the victim of harassment at work, or have witnessed such conduct, they should, as soon as possible, follow the following procedure:

1. If comfortable doing so, **ask** the person responsible for the harassment or discrimination to **immediately stop** the offensive behaviour.
2. If s/he does not feel comfortable doing so or the behaviour persists, report the alleged incidents **verbally or in writing to the designated persons** (see page 5).
  - The report should include as much detail as possible, including a description of the events or situation, the time, date, location, name of the person who is the subject of the complaint, names of witnesses, and any other details the person considers necessary.
  - The complaint should be filed as soon as possible after the harassing or discriminatory incident, so that the situation can be addressed promptly.
3. Equifruit will ensure that complaints are investigated **discreetly, objectively and with respect for the dignity** of all parties involved.
4. Upon receipt of the report, Equifruit will conduct a **preliminary analysis** of the complaint to determine whether, taking the reported facts as true, they may constitute harassment. If not, the file will be closed. If so, the following steps will be taken:
  - a. An **investigation** will be conducted, either by the President or by a third party, in a fair, timely, complete, and thorough manner. The investigation may include a meeting with the alleged victim, the alleged harasser, witnesses, and other individuals identified during the investigation. Certain documents may also be requested and reviewed. A conclusion will be drawn based on the facts and evidence gathered.

Equifruit expects everyone to cooperate and participate fully in any investigation into such a complaint.

Mediation is offered at any time, before and/or after the investigation.

If necessary, Equifruit may implement temporary measures to ensure the safety and well-being of the complainant and to limit contact with the alleged harasser during the investigation.

**To protect the interests of the individuals involved, all are bound by confidentiality during and after the investigation**, except to the extent that disclosure of information is necessary for the proper conduct of the investigation, the application of policy, a disciplinary process or the law.

- b. The **outcome** of the investigation will be communicated to the complainant and the alleged harasser. The parties will not receive a copy of the investigation report (as it is a highly confidential document). If it is determined that harassment, bullying, or discrimination has occurred, appropriate action will be taken promptly.
  - c. The findings of the investigation will be used by Equifruit to **implement measures** to eliminate or control the risk of harassment or discrimination that was identified as a result of the investigation.

## **DISCIPLINARY AND OTHER MEASURES**

Any person who violates this policy will be subject to appropriate disciplinary action. The choice of action will take into account the seriousness and consequences of the action(s) as well as the previous record of the person who committed them.

## **FALSE OR MALICIOUS COMPLAINT**

Any person who makes false accusations with the intention of causing harm is also liable to disciplinary action, which may include dismissal for serious reasons.

## **REPRISALS**

In the handling and resolution of a situation relating to harassment at work, no one should suffer harm or be subject to reprisals.

Any retaliatory behaviour by one person toward another will be considered a serious violation of this policy and the person in question may be subject to appropriate disciplinary action, up to and including termination for cause.

## **INFORMATION AND TRAINING**

Equifruit is committed to providing all staff members with the tools and knowledge necessary to identify possible violations of this policy, to understand the consequences and to recognize all the benefits of a workplace free from harassment and discrimination.

As such, all staff members will be required to attend the planned internal information or training sessions.

## **CONSERVATION AND ARCHIVING**

Equifruit will keep records of all complaints.

These files will be kept confidentially for a period of at least two (2) years.

## **DESIGNATED RESPONSIBLE PERSON**

For all complaints or inquiries as to the application of the policy, please contact **Jennie Coleman, President**, at [support@equifruit.com](mailto:support@equifruit.com).

# APPENDIX 1

## Recognize psychological, sexual or discriminatory harassment and sexual violence

The *Loi sur les normes du travail* provides criteria for determining what can be considered psychological or sexual harassment, namely:

**Vexatious (hurtful, humiliating)** conduct that manifests itself repeatedly, in a **hostile** (aggressive, threatening) or unwanted manner, undermining the **dignity or integrity** of the person, resulting in a **harmful** (harmful, injurious) work environment for the person.

A single serious conduct may also constitute psychological harassment if it causes such harm and produces a continuing harmful effect on the person targeted by this conduct.

### ➡ Examples of behaviours that could be classified as **psychological harassment** :

- Intimidation
- Verbal abuse, shouting or attacking a person, damaging their property, assaulting or threatening them
- Isolation
- Displaying or distributing racist or offensive material, messages, posters or images
- Abusive surveillance
- Spreading rumours about others
- Frequent and unjustified criticism of minor matters, unfair assignment of tasks or work, inappropriate or derogatory remarks.

Psychological harassment includes words, actions, or gestures of a sexual nature. It also includes discriminatory harassment and sexual violence.

### ➡ Examples of behaviours that may qualify as **sexual harassment** :

- Encouraging a sexually intimidating or offensive work environment
- Comments, suggestions, innuendos, jokes or requests of a sexual nature
- Any inappropriate comment about a person's appearance, attractiveness, or unattractiveness
- Any inappropriate and/or unwanted physical behaviour of a sexual nature
- Any inappropriate and/or unwanted physical contact/touching
- Any invitation to perform sexual favours
- Any comments regarding the sexual orientation or preferences of others
- Any sexual assault.

Discrimination based on any of the grounds listed in **section 10 of the Charter of Rights and Freedoms** may also constitute harassment: race, colour, sex, pregnancy, sexual orientation, marital status, age except to the extent provided by law, religion, political beliefs, language, ethnic or national origin, social condition, disability or the use of a means to compensate for this disability.

➡ Examples of behaviours that may qualify as **discriminatory harassment** :

- Derogatory remarks, jokes, innuendos or offensive comments related to any of the protected grounds
- The display or communication of photos, internet memes (“memes”) or objects related to one of the protected motifs
- Unjustified exclusion of an individual based on one of the protected grounds
- An unfair distribution of work or responsibilities, based on one of the reasons mentioned above

Sexual violence means any form of violence targeting sexuality or any other misconduct manifested by unwanted gestures, practices, words, behaviours or attitudes of a sexual nature, whether occurring on a single occasion or repeatedly. It includes violence related to sexual and gender diversity.