

GROSSO GROUP MANAGEMENT LTD.

WORKPLACE BULLYING AND HARASSMENT POLICY

1. Workplace conduct

Bullying and harassment is not acceptable or tolerated in this workplace. All workers will be treated in a fair and respectful manner.

2. Bullying and harassment

- (a) includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but
- (b) excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Examples of conduct or comments that might constitute bullying and harassment include verbal aggression or insults, calling someone derogatory names, harmful hazing or initiation practices, vandalizing personal belongings, and spreading malicious rumours.

3. Workers must:

- not engage in the bullying and harassment of other workers
- report if bullying and harassment is observed or experienced (reporting procedures and complaint form are attached)
- apply and comply with the employer's policies and procedures on bullying and harassment

4. Application

This policy statement applies to all workers, including permanent, temporary, casual, contract, and student workers. It applies to interpersonal and electronic communications, such as email.

5. Annual review

This policy statement will be reviewed every year. All workers will be provided with a copy.

Date created May 26, 2022	Annual review date
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GROSSO GROUP MANAGEMENT LTD.
WORKPLACE BULLYING AND HARASSMENT
REPORTING PROCEDURES

1. How to report

Workers at Grosso Group Management Ltd. can report incidents or complaints of workplace bullying and harassment verbally or in writing. When submitting a written complaint, please use the workplace bullying and harassment complaint form (attached). When reporting verbally, the reporting contact, along with the complainant, will fill out the complaint form.

2. When to report

Incidents or complaints should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated and addressed promptly.

3. Reporting contact

Report any incidents or complaints to Nikolaos Cacos, CEO, at 604-687-1828 or by email to ncacos@grossogroup.com.

4. Alternate reporting contact

If the employer, the complainant's supervisor, or the reporting contact named in Step 3 is the person engaging in bullying and harassing behaviour, contact Darren Urquhart, CFO, at 604-687-1828 or by email durquhart@grossogroup.com.

5. What to include in a report

Provide as much information as possible in the report, such as the names of people involved, witnesses, where the events occurred, when they occurred, and what behaviour and/or words led to the complaint. Attach any supporting documents, such as emails, handwritten notes, or photographs. Physical evidence, such as vandalized personal belongings, can also be submitted.

6. Annual review

These reporting procedures will be reviewed on an annual basis. All workers will be provided with a copy.

Date created May 26, 2022	Annual review date
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WORKPLACE BULLYING AND HARASSMENT

COMPLAINT FORM

Name and contact information of complainant
Name of alleged bully or bullies

Personal statement

Please describe in as much detail as possible the bullying and harassment incident(s), including:

- the names of the parties involved
- any witnesses to the incident(s)
- the location, date, and time of the incident(s)
- details about the incident(s) (behaviour and/or words used)
- any additional details that would help with an investigation

Attach any supporting documents, such as emails, handwritten notes, or photographs. Physical evidence, such as vandalized personal belongings, can also be submitted.

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Signature	Date
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