

Respectful Workplace Policy - Canada

THE REAL BROKERAGE INC.

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Overview:

The Real Brokerage Inc., and its affiliated entities (“**Company**”), recognizes the right to work in a safe and secure environment that is free from bullying and harassment, discrimination and violence.

This Respectful Workplace Policy (“**Policy**”) applies to all Canadian employees and officers, regardless of status or position, including temporary and seasonal workers (“**Employees**”). The Policy also applies to directors of the Company, real estate agents, contractors, consultants and their employees, who work in Canada (collectively, “**Consultant**” and, together with Employees, “**Covered Persons**”). Nothing in this Policy creates an employment relationship with any independent contractor where an employment relationship does not already exist.

This Policy applies not only to work-related activities at Company branches and property, but also client sites, Company social functions (whether informal or obligatory), and off-duty conduct between individuals associated with the Company.

1. Definitions

- “**Bullying and harassment**” means any inappropriate conduct or comment that is known or ought reasonably to be known to be unwelcome. Harassment includes unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating, or demeaning to a colleague or client. Workplace harassment does not include reasonable actions taken by the Company a supervisor/manager relating to the management and direction of Employees.
- “**Cyberbullying**” is discrimination, bullying or harassment that occurs through the use of electronic communication, including e-mail, text messaging, and social networking. This can involve the posting of comments, rumors, photos and the sending of threatening messages.
- “**Discrimination**” is making a distinction, whether intentional or not, but based on grounds set out in the applicable human rights legislation which imposes burdens, obligations, or disadvantages on an individual or group not imposed upon others. The protected grounds of the applicable provincial human rights legislation include, but are not limited to the following: race, sex, ancestry, place of origin, colour, ethnic origin, language, citizenship, religion, gender identity, sexual orientation, age, disability, marital status, family status and disability.
- “**Workplace sexual harassment**” means engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. It is also includes making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or

advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

- **“Workplace violence”** is the threatened, attempted or actual exercise of physical force in the workplace by a person against a Covered Person that causes or could reasonably cause physical injury. It can also include a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

2. Specific Examples of Discrimination, Harassment and Workplace Violence

Examples of personal harassment that are not based on a ground protected by human rights legislation, but which would still be prohibited under this policy are:

- Insults or verbal aggression, such as yelling, swearing, name-calling, and intentional humiliation.
- Multiple or destructive “pranks” or “practical jokes” directed towards an individual, or targeted group of individuals, including harmful hazing or initiation practices.
- Vandalizing or otherwise damaging or defiling personal belongings, work area or work product.
- Isolating or ignoring, or unwarranted exclusion from organized team building activities.
- Spreading malicious rumours (regardless whether they are believed to be true).

Sexual harassment is one of the most common forms of discrimination based on a ground enumerated in human rights legislation; it is a form of discrimination based on sex, gender identity, sexual orientation or gender expression. Examples of sexual harassment include, but are not limited to, the following:

- Making or threatening reprisals after a negative response to sexual advances.
- Making unwelcome sexual advances, propositions, flirtations or repeated unwelcome requests for or efforts to make social contact, including asking questions about sexual conduct or sexual orientation or spreading rumours about such information.
- Making comments about an individual’s body, sexual prowess, sexual orientation, gender identity, or sexual or gender deficiencies or using sexually degrading or vulgar words to describe an individual or making derogatory sexual or gender-based comments
- Displaying or distributing sexually suggestive or gender-based objects, pictures, posters, cartoons, letters, or e-mails.

Examples of discrimination on the basis of other enumerated grounds of human rights legislation include, but are not limited to, the following:

- Offensive jokes related to race or nationality.
- Racial slurs or commentary.

- Display of literature or materials (including electronic documents such as email, texts and social media posts) that promote the supremacy of one race or ethnic group or belittle a race or ethnic group.

The above examples of harassment, bullying and discrimination may occur in multiple manners, including through cyberbullying.

Examples of prohibited workplace violence include, but are not limited to, the following:

- Hitting, shoving, tripping, pushing, kicking, assault and sexual assault.
- Physical horseplay, threatening gestures, or physical practical jokes.
- Yelling, swearing and threatening the well-being of a person.
- Displaying objects the purpose of which is to intimidate or cause harm to a person.

3. Responsibilities

The Company has the responsibility to:

- Discourage and prevent forms of harassment, discrimination and violence, whether or not a formal complaint has been filed.
- Interpret this policy in a manner consistent with the applicable human rights, privacy, and occupational health and safety legislation and regulations.
- Incorporate this policy in orientations and training.
- Provide regular and ongoing policy communications to its employees, clients and sub-contractors.
- Ensure that, as part of their performance indicators, management understands the policy and has the ability to manage conflict effectively.
- Ensure that Human Resources representatives continue to commit to a periodic of the policy and complaint process to ensure compliance with the legislative requirements.

Management and their designates are responsible for:

- Ensuring that the workplace is free from discrimination, harassment and violence.
- Promoting positive respectful behaviour and ensuring that Covered Persons know that violence, discrimination and harassment will not be tolerated.
- Ensuring that Covered Persons know their rights and responsibilities under this Policy, including ways in which incidents or allegations of discrimination, harassment and violence can be addressed.

- Managing incidents or complaints of discrimination, harassment, violence in a prompt and efficient manner, whether or not a complaint has been filed.
- Consulting with Human Resources and the Legal Department as needed.
- Reminding Covered Persons of their obligations of confidentiality and non-retaliation against any complainant, respondent or witness under this policy.
- Ensuring that every incident or complaint is investigated.
- Declaring any actual or potential conflict of interest in relation to an incident or complaint under this policy.
- Cooperating with investigators and working to implement any corrective action found necessary.

Senior Management, in partnership with applicable Company departments, are responsible for:

- Ensuring that management effectively implements this policy and are held accountable for doing so.
- Ensuring that management has the appropriate knowledge, skills, processes, and resources to implement this policy.
- Ensuring that all Covered Persons are informed of rights and responsibilities under this policy.
- Implementing effective corrective action to violations of this policy.
- Administering investigations of incidents and complaints, including deciding whether to involve third party investigators, legal services, and/or others, and assisting develop the appropriate and proportional corrective action for violations of this policy.
- Monitoring compliance and enforcement of this policy.
- Reminding Covered Persons of their obligations of confidentiality and non-retaliation against any complainant, respondent or witness under this policy.

Covered Persons are required to:

- Refrain from engaging in discrimination, bullying and/or harassing behaviours.
- Refrain from engaging in workplace violence.
- Report all instances of discrimination, bullying and harassment, and workplace violence, whether they are the target or a witness of such an incident.
- Refrain from making false, vexatious or unsubstantiated allegations about discrimination, bullying or harassment, or workplace violence.

- Comply with the Company’s policies and procedures.
- Attend training sessions as required to better understand their rights and obligations under this policy.

4. Zero Tolerance

The Company has zero tolerance for any form of discrimination, bullying or harassment, or workplace violence. Covered Persons who engage in discrimination, bullying or harassment, or workplace violence are in violation of this policy and will be subject to corrective action, as set out below.

5. Retaliation Prohibited

The Company prohibits retaliation against any person who in good faith reports discrimination, bullying or harassment, or workplace violence or participates in an investigation of such incidents or complaints. Retaliation against a person for reporting discrimination, bullying or harassment, or workplace violence, or for participating in an investigation of an incident or complaint is a serious violation of this policy and, like discrimination, bullying or harassment, or workplace violence, will be subject to corrective action, as set out below.

6. False Claims

Covered Persons who intentionally make false, vexatious, or unsubstantiated allegations of discrimination, bullying or harassment, or workplace violence, will be subject to discipline up to and including dismissal or termination of the Covered Person’s agreement with the Company, and may be held financially responsible for the costs of the investigation.

7. What to do in case of Workplace Violence

Because of its potential for immediate and serious harm, procedures for responding to workplace violence are different from responding to discrimination, bullying or harassment.

Covered Persons should use their common sense and in the event of an emergency, should immediately contact the appropriate emergency service (police, fire or ambulance – Telephone 9-1-1).

Take all necessary and reasonable steps to ensure your own safety and the safety of others.

All instances of actual workplace violence or potential risks that may lead to workplace violence should be immediately reported to a manager.

The Company periodically assesses the risks of workplace violence that may arise given the nature of the Company’s workplace, the type of work performed and the conditions under which work is performed. The Company will institute measures to control any identified risks of workplace violence. This information will be provided to the Company’s workplace health and safety representatives and/or committee. The

Company will reassess the risks of workplace violence as often as is necessary to ensure that this policy continues to protect Covered Persons from workplace violence.

The Company will provide information relating to persons with a history of violence where:

- Covered Persons may reasonably be expected to come into contact with such persons in the performance of their duties and responsibilities; and
- there is a potential risk of workplace violence as a result of interactions with such persons.

The Company will only disclose personal information that is reasonably necessary to protect Covered Persons from such persons.

Covered Persons must inform the Company of any domestic violence that might jeopardize the safety of the Covered Person or other Covered Persons in the workplace. Covered Persons who apply for or obtain a restraining order or peace bond which lists the workplace as being a protected area must provide the Company with a copy of the restraining order or peace bond and any other relevant documents or information the Company requests. If the Company is aware that domestic violence is likely to expose Covered Persons to workplace violence, every precaution reasonable in the circumstances will be implemented to protect Covered Persons in the workplace. The Company will only disclose personal information that is reasonably necessary to protect employees from domestic violence.

8. What to do in Case of Discrimination, Bullying or Harassment

If appropriate, the Company encourages employees to address any conduct that they consider to be inappropriate or unwelcome in an informal manner by advising the individual of the concern and asking them to stop.

If a Covered Person feels that such Covered Person has been the victim of bullying, harassment, or discrimination, or an employee witnesses conduct that they believe is bullying, harassment, or discrimination, the Covered Persons should contact and report it:

- In the case of a Consultant, to the Company's Legal Department at legal@therealbrokerage.com.
- In the case of an Employee, to the Employee's immediate managers, or if it is not appropriate to approach the immediate manager (e.g. that manager is involved with or would reasonably be believed to have a bias in the harassment), the Employee may contact a member of the Company's Human Resources team. In addition, concerns may be reported to the whistleblower hotline.

Reports should include the following information:

- name and contact information of the person making the report;
- name and contact information of the alleged victim;
- name and contact information of the alleged offender;
- names and contact information of any witnesses or other persons with relevant information;
- details of what happened, including dates, frequency and locations;
- copies or descriptions of any relevant documents; and
- list of any documents a witness, another person or the respondent(s) may have in their possession that are relevant to the complaint.

Reporting is essential to the implementation and enforcement of this policy. The Company may ask a Covered Person reporting concerns to complete a form with additional details.

9. How the Company Addresses Incidents and Complaints

The Company will investigate all incidents and complaints and where a breach of this Policy established, the Company will implement corrective action.

If the Company becomes aware of an incident or complaint, the Company will take appropriate interim measures for the protection of Covered Persons, including removing Covered Persons from the workplace and placing employees on an administrative leave of absence.

(a) The Process

The complaint will be promptly investigated in an impartial, thorough, and discreet manner either by a representative of the Company or another qualified designee.

Investigations will generally be conducted within 30 days after receiving notice of an incident or the complaint. The complexity of an incident or complaint or other circumstances may result in an investigation taking longer.

While the Company will tailor the nature of the investigative process to the particular circumstances of each case, the investigation may include:

- interviewing the complainant and the respondent
- interviewing any witnesses to the conduct
- gathering and reviewing relevant documents, telephone, voice, data, text messages and any other record including written statements, notes, emails, pictures and other electronic records
- making findings of fact and conclusions

- determining the appropriate follow up action

All Covered Persons, including the complainant and respondent, are expected to fully cooperate with the investigation process. This may include providing information in an interview, submitting a written statement, and/or disclosing emails or documents.

The process for investigating and resolving incidents and complaints may range from a process where a few words are all that is needed to investigate and resolve the matter to a process involving extensive submissions, fact-finding and the use of outside investigators or outside counsel. The Company will make the decision as to the appropriate resources to allocate to each incident or complaint and as to the process for the investigation.

(b) What Happens After the Investigation?

Where bullying, harassment, or discrimination, or workplace violence has been found, the Company will take corrective action and determine the appropriate response, including whether discipline and/or remedial steps should be implemented. Corrective action may include:

- making a note of the incident on the Employee's personnel file;
- a verbal discussion with or letter to the Employee setting out the Company's expectations going forward;
- requiring the Employee to attend training or counselling or to issue an apology;
- transfer or demotion of the Employee; and
- where appropriate, termination of the working relationship with the Employee or termination by the Company of the agreement with the Consultant.

(c) Confidentiality

Any person who participates in an investigation into an incident or complaint of bullying, harassment, discrimination or workplace violence shall not discuss the investigation with any other person, except with the person's immediate family and to the extent necessary to obtain legal advice about such person's rights.

The Company will not disclose any information obtained about an incident or complaint of bullying, harassment, discrimination or workplace violence except where disclosure is necessary for the purposes of protecting employees, investigating the incident or complaint or taking responsive measures in relation thereto or as otherwise permitted by this policy. Note that in almost all incidents and complaints, the Company will have to disclose to the party being accused of harassment or bullying (a "respondent") and potential witnesses enough information about the complaint to allow them to give meaningful evidence, either in response (for the respondent) or generally (for witnesses). This may involve or result in identification of the person making the complaint or the person who is the victim of bullying, harassment, discrimination or workplace violence (a "complainant").

It is common in most complaints for the investigator to collaborate with senior management, Human Resources and the Legal Department, as appropriate, and share information about an incident, complaint and an investigation. If a member of senior management, Human Resources or the Legal Department

is named as a respondent or potential witness, they would not participate in this collaboration.

The result of an investigation into an incident or complaint will be shared with the complainant and respondent in writing.

(d) Record Keeping

The Company will keep records of the investigation for at least three years.

10. General

The Company will review and, if determined necessary, update this Policy on a periodic basis to ensure ongoing compliance with applicable legislative and regulatory requirements. Nothing in this policy replaces any other legal rights a Covered Person may have.