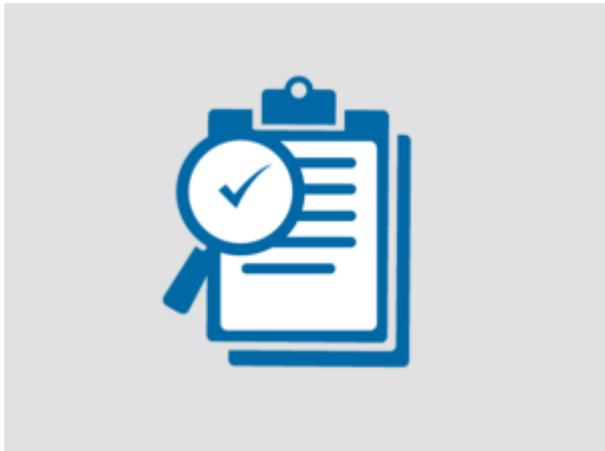


Off-Duty Conduct Policy



1. STATEMENT OF POLICY

The management of ABC Company recognizes that how employees decide to lead their lives when they're off-duty is a private matter. However, the way employees behave and present themselves when off-duty can also have a significant impact on ABC Company, its business, reputation, products, customer relations and workplace environment.

Accordingly, employees are reminded that the requirements to engage in legal, ethical, moral, professional and respectful behaviour set forth in ABC Company's HR policies and Code of Conduct apply both in and away from the workplace. Accordingly, employees who violate those standards of conduct and behaviour when they are off-duty and/or away from the workplace will be subject discipline, up to and including termination, to the extent such conduct and behaviour has a nexus to the workplace.

2. PURPOSE

The purpose of this Policy is to establish clear expectations and standards governing how employees should behave when they're off-duty and outline the procedures ABC Company will follow to enforce those standards, including via the imposition of discipline for off-duty violations that have a nexus to the workplace.

3. CODE OF OFF-DUTY CONDUCT

While they're off-duty, ABC Company employees may not:

- Commit any acts which constitute sexual assault, indecent exposure or other violations of the Criminal Code of Canada or provincial or local penal codes;
- Commit any acts that constitute domestic violence, stalking or court orders restraining employees from contact with any person or being at or near another person's home, workplace or other location;
- Use the internet or other social or communication media to engage in sexual conduct, lewd, discriminatory, harassing, stalking, defamatory or other objectionable behaviour; or
- Engage in other forms of sexually immoral or objectionable conduct.

4. OFF-DUTY CONDUCT THAT IS NOT ACCEPTABLE

Illegal, immoral or objectionable conduct that occurs off-duty, including but not limited to conduct that violates the guidelines set forth above, will be considered a work-related matter subject to discipline if it:

- Harms ABC Company's reputation or the reputation of its management, employees, customers, clients, goods, services or any other aspect of its business;
- Has consequences that render employees unable to perform their job or any part of their job effectively;
- Leads other workers to refuse, be reluctant to or unable to work with the employee;
- Constitutes a serious breach of the Criminal Code of Canada; and/or
- Makes it difficult for ABC Company to manage its operations and/or direct its workforce efficiently.

5. EMPLOYEE DUTY TO SELF-DISCLOSE

All employees must report to their supervisor or ABC Company's HR Department as soon as possible if they are arrested, detained or charged with a violation under the *Criminal Code of Canada*, are charged with a professional violation potentially affecting their licence or professional standing or are the subject of any other accusation or proceeding under other Canadian laws related to their official duties.

6. EMPLOYEE DUTY TO REPORT

Employees must report any unacceptable off-duty conduct committed by co-workers or other ABC Company personnel of which they are aware. However, employees must also recognize that making a formal accusation against another employee is a serious matter that has repercussions. Employees who make off-duty conduct violations accusations that are malicious, frivolous and/or in bad faith will themselves be subject to disciplinary action. Bad faith occurs when accusers deliberately make accusations that they know are false or recklessly without regard to whether the accusation is true, typically with the intent to harass the accused, waste the Company's time or carry out another dishonourable purpose. Accusations that turn out not to have merit will not be grounds for discipline, provided that they are made in good faith in the sincere and reasonable belief that the accusation was based on reasonable evidence.

7. DISCIPLINE

Violations of ABC Company's off-duty standards of conduct that meet the above criteria will be treated like a disciplinary infraction committed on-duty and subject to discipline up to and including termination in accordance with the ABC Company progressive discipline policy and the terms of applicable collective agreements.