

# TETRA BIO-PHARMA INC. (the “Corporation”)

## Policy on the Prevention of Psychological or Sexual Harassment at Work and the Handling of Complaints

### 1 PURPOSE

---

The purpose of this policy is to affirm the commitment of Tetra Bio-Pharma Inc. and its subsidiaries ("TETRA") to prevent and end psychological or sexual harassment within its company, including any form of discriminatory harassment. It also sets out the principles of intervention that are applied in the company when a harassment complaint is filed or when a harassment situation is reported to the employer or his representative.

### 2 SCOPE

---

This policy applies to all employees within the company, and at all levels of management, including in the following locations and contexts:

- the workplace;
- common areas;
- any other place where people must be in the course of their employment (e.g., meetings, training, travel, social events organized by the employer); and
- communications by any means, technological or otherwise.

### 3 DEFINITION

---

The Labour Standards Act defines psychological harassment as follows<sup>1</sup>:

"Vexatious conduct that manifests itself either in behaviour, words, acts or repeated gestures, which are hostile or unwanted, which brings about the dignity or psychological or physical integrity of the employee and which results in, for a workplace. For greater certainty, psychological harassment includes such conduct when it is manifested in such words, acts, or acts of a sexual nature. A single serious conduct can also constitute psychological harassment if it causes such harm and has an ongoing harmful effect on the employee."

The definition includes harassment related to one of the grounds of the Charter of Human Rights and Freedoms<sup>2</sup>

---

<sup>1</sup> See Annex 1 of this policy for details.

<sup>2</sup> These grounds of discrimination are listed in Annex 1

The notion of harassment should be distinguished from other situations such as interpersonal conflict, work-related stress, difficult work constraints or the normal exercise of managerial rights (Attendance Management, Work Organization, Discipline, etc.).

## 4 POLICY STATEMENT

---

TETRA does not tolerate or admit any form of psychological or sexual harassment within its company, either:

- by managers to employees;
- between colleagues; and
- by employees to their superiors;
- from everyone associated with them: representatives, customers, suppliers, visitors or other.

Any behaviour related to harassment may result in disciplinary action up to and including termination.

**TETRA undertakes to take reasonable steps to:**

- provide a workplace free of harassment to protect the dignity, psychological and physical integrity of individuals;
- disseminate the policy in such a way as to make it accessible to all staff, by integrating and registering this policy as a new Tetra SOP (available to all Tetra Employees on Team, this new SOP to be read and signed as proof of reading by all Tetra employees, and to be filed in the Tetra SOP log book).
- prevent or, as appropriate, stop harassment by:
  - a) following procedures as defined in 6) and 7) for dealing with complaints and reports;
  - b) psychological or sexual harassment;
  - c) ensuring that all persons understand and comply with the policy; and
  - d) promoting respect between individuals.

## 5 STAFF EXPECTATIONS

---

It is the responsibility of all staff to conduct themselves in a manner that maintains an environment free from psychological or sexual harassment.

## 6 HANDLING COMPLAINTS AND REPORTS

---

Where possible, the person who believes that he or she is being subjected to psychological or sexual harassment first informs the person concerned that his or her behaviour is undesirable and that the person concerned must put an end to it. They should also note the date and details of the incidents and the steps they take to try to resolve the situation.

If this first intervention does not resolve the situation or if the harassment continues, the employee must report the situation to one of the persons designated by the employer in order to identify the problematic behaviours and the actions required. A complaint may be made orally or in writing. The behaviours and details of the incidents must be described as accurately as possible, so that an intervention can be carried out quickly to stop the situation.

The persons designated by the employer are:

1. **Diane Roberge**, Director of Human Resources  
Tetra Bio-Pharma office in Longueuil - 438-899-7575, ext. 206 / Cell. 438-390-6378
2. **Kelley Leithman**, Vice President, Legal Affairs  
Tetra Bio-Pharma office in Longueuil - 438-899-7575, ext. 231 / Cell. 514-999-8455

The person who witnessed a harassment situation is also encouraged to report it to one of the above-mentioned responsible persons.

## 7 INTERVENTION

---

**TETRA agrees to:**

- Handle the complaint or report as soon as possible;
- Preserve the dignity and privacy of the persons concerned, that is, the person who made the complaint, the person who is the subject of the complaint and the witnesses;
- Ensure that all persons are treated with humanity, fairness and objectivity and that support is provided;
- Protect the confidentiality of the intervention process, including information related to the complaint or report;
- Provide the persons concerned the opportunity to meet with them, with their consent to resolve the situation;
- Conduct, if needed, an investigation without delay and objectively, or assign the responsibility to an external party. Those concerned will be informed of the conclusion of this procedure. If the investigation does not establish unacceptable behavior, all physical evidence will be retained for two years and subsequently destroyed;
- Take all reasonable steps to resolve the situation, including appropriate disciplinary action.

Any person who commits a breach of the harassment policy will be subject to disciplinary action. The choice of the applicable measure shall take into account the seriousness and consequences of the act or acts as determined by the previous record of the person who committed them.

The person who would lay false charges for the purpose of harm is also subject to appropriate disciplinary action.

In the treatment and resolution of a situation involving harassment in the workplace, no one shall be harmed or subject to reprisal by the employer.

**TETRA BIO-PHARMA INC.**

  
\_\_\_\_\_  
**Guy Chamberland**  
CEO and Chief Regulatory Officer

Date Jan 8, 2020

## ANNEX 1

### RECOGNIZING PSYCHOLOGICAL OR SEXUAL HARASSMENT

The Labour Standards Act sets out criteria for determining what can be considered psychological or sexual harassment:

- vexatious conduct (hurtful, humiliating);
- that is repeated or in the course of a single and serious act;
- in a hostile manner (aggressive, threatening) or unwanted;
- impairing the person's dignity or integrity;
- resulting in a harmful work environment.

This includes words, acts or gestures of a sexual nature.

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 alleviate that disability.

For example, the following behaviours could be considered vexatious conduct that constitutes harassment if they meet all the criteria of the Act.

#### **Behaviours that may be related to psychological harassment**

- Bullying, cyberbullying, threats, isolation
- Offensive or defamatory comments or gestures about a person or their work;
- Verbal abuse; and
- Denigration.

#### **Behaviours that may be related to sexual harassment**

Any unwanted form of attention or advance with a sexual connotation, for example:

- insistent solicitation
- greetings, kisses or touching
- sexist insults, rude remarks
- Sexual comments, jokes or images by any means, technological or otherwise.

## ANNEX 2

# PERSONS DESIGNATED BY THE EMPLOYER FOR THE APPLICATION OF THE POLICY OF THE POLICY

---

### TETRA will:


- ensure that the persons designated for the application of the policy are properly trained and have the necessary tools at their disposal to process and follow up on the complaint or report;
- free up work time so that these individuals can perform their assigned duties;
- inform staff about the company's policy on psychological or sexual harassment;
- act informally to try to resolve situations;
- receive complaints and reports; and
- recommend the nature of the actions to be taken to stop the harassment.

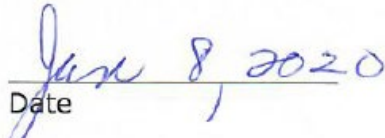
The following persons are designated by TETRA for the application of the Policy on the Prevention of Psychological or Sexual Harassment at Work and the Handling of Complaints:

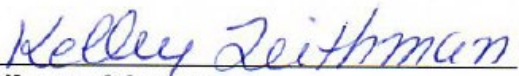
- **Diane Roberge**, Director of Human Resources  
Tetra Bio-Pharma office, 365 St-Jean Street, Room 122, Longueuil, QC J4H 2X7 438-899-7575, ext. 206 / Cell. 438-390-6378
- **Kelley Leithman**, Vice President, Legal Affairs  
Tetra Bio-Pharma office, 365 St-Jean, Room 122, Longueuil, QC J4H 2X7 438-899-7575, ext. 231 / Cell. 514-999-8455

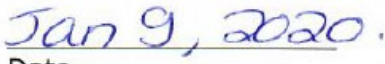
### COMMITMENT OF DESIGNATED PERSONS

I hereby declare my commitment to comply with this policy and assure that my intervention will be impartial, respectful, and confidential.

  
**Diane Roberge**  
Director, Human Resources

  
Date

  
**Kelley Leithman**  
Vice President, Legal Affairs

  
Date