


CORPORATE POLICY

Workplace Violence, Harassment, and Sexual Harassment Policy

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| Title: Workplace Violence, Harassment, and Sexual Harassment Policy | Doc Number: HR.POL.002 |
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| Originating Department: Human Resources | |
| Approved by: Rajat Marwah | Signature:  |

A. Introduction

Algoma Steel Inc. is committed to maintaining a fair and equitable environment free of harassment and violence. We commit to taking all reasonable actions to prevent workplace violence, harassment, and sexual harassment by implementing a Workplace Violence, Harassment, and Sexual Harassment Prevention Program. Workplace Violence and Harassment will not be tolerated in the workplace. This includes inappropriate actions or comments made by management, employees, contractors, and visitors. This encompasses employment-related incidents that occur beyond the normal workplace, in digital spaces, such as emails, chats, and video calls, or outside of working hours.

B. Occupational Health & Safety Act Definitions:

1.1. Workplace violence

- The exercise or attempt to exercise physical force by one person against another, that causes or could cause physical injury.
- A statement of behaviour that is reasonable to interpret as a threat to exercise physical force against another, in the workplace, that could cause physical injury.

1.2. Workplace harassment:

- Engaging in a course of vexatious comment or conduct against another that is known or ought reasonably to be known to be unwelcome.

1.3. Workplace sexual harassment:

- 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; or

- 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.

C. What is NOT Workplace harassment:

A reasonable action taken by an employer or supervisor relating to the management and direction of workers in the workplace is not workplace harassment.

Workers are encouraged to report any incidents of workplace violence or harassment. Investigations into incidents of workplace violence or harassment will be done in a fair, respectful, and timely manner. Information provided about an incident or complaint will not be disclosed except as necessary to protect workers, to investigate the incident or complaint, to take corrective action, or as otherwise required by law.

Management, employees, contractors, and visitors are expected to adhere to this policy and will be held responsible by Algoma Steel Inc. for not following it. Individuals that report an incident in good faith are not to be penalized or disciplined for participating in an investigation involving workplace violence or harassment.

All workers should be treated with dignity and respect. If a worker needs further assistance, they are encouraged to raise any concerns and to report any violent or harassing incidents as outlined in the Workplace, Violence, Harassment, and Sexual Harassment Prevention Program or Collective Agreement.