

SARKISSIAN FINANCIAL GROUP

Policy on the Prevention and Resolution of Psychological and Sexual Harassment

Sarkissian Financial Group is committed to offering a healthy, safe, professional, and respectful work and service environment. Every employee, representative, manager, client, and business partner has the right to be treated with dignity, fairness, and mutual respect.

In accordance with the *Act respecting labour standards* (CQLR, c. N-1.1, ss. 81.18 to 81.20) in Quebec, the *Charter of human rights and freedoms*, and the *Act to prevent and fight psychological harassment and sexual violence in the workplace* (Bill 42), Sarkissian Financial Group has established this mandatory policy to prevent, address, and eliminate all forms of harassment and violence.

1. PURPOSE AND SCOPE

The purpose of this Policy is to affirm the Company's zero-tolerance stance on psychological harassment, sexual harassment, discriminatory harassment, and sexual violence, to define prohibited conduct, and to establish clear complaint, investigation, and resolution procedures.

Scope: This policy applies to all employees, executives, management, independent brokers, representatives, contractors, job applicants, interns, and third parties (including clients and suppliers). It applies during working hours, in the physical office (4226 Boul Saint-Jean, DDO), during telework/remote work, business trips, professional social events, and across electronic communications (email, messaging platforms, social networks, and phone).

2. LEGAL DEFINITIONS AND PROHIBITED CONDUCT

Under Section 81.18 of the *Act respecting labour standards* (Quebec), **psychological harassment** means:

"Any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee's dignity or psychological or physical integrity and that results in a harmful work environment for the employee. For greater certainty, psychological harassment includes such behaviour in the form of such verbal comments, actions or gestures of a sexual nature."

Single Serious Incident: A single serious incidence of such behaviour that has a lasting harmful effect on an individual also constitutes psychological or sexual harassment under the law.

Forms of Prohibited Harassment include:

- **Psychological Harassment:** Humiliation, insults, intimidation, threats, public ridicule, unwarranted isolation, abusive criticism, malicious gossip, cyberbullying, or deliberate sabotage of work.
- **Sexual Harassment and Sexual Violence:** Any unwanted behaviour, comment, innuendo, gesture, or contact of a sexual nature, requests for sexual favours, unsolicited remarks about physical appearance, sexist remarks, sending explicit texts/images, or sexual assault.
- **Discriminatory Harassment:** Any vexatious conduct based on grounds prohibited under the Quebec *Charter of human rights and freedoms* (race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age, religion, political convictions, language, ethnic or national origin, social condition, or disability).
- **Third-Party Harassment:** Inappropriate, hostile, or abusive behaviour directed toward personnel by clients, suppliers, or external visitors, as well as inappropriate conduct by representatives toward clients.

3. MANAGEMENT RIGHTS VS. HARASSMENT

Psychological harassment must be distinguished from the legitimate exercise of management authority. Legitimate management actions conducted in a professional and constructive manner—such as performance evaluations, work assignments, organizational changes, constructive feedback, or disciplinary measures—do not constitute harassment.

4. ROLES AND RESPONSIBILITIES

- 1 The Company & Management:** Commit to providing a harassment-free environment, taking all reasonable means to prevent harassment, acting immediately upon becoming aware of any inappropriate behaviour, and ensuring confidential, impartial handling of complaints.
- 2 Employees & Representatives:** Must conduct themselves respectfully at all times, refrain from any form of harassment, promote a respectful work environment, and cooperate in any investigation.
- 3 Designated Officer:** The Compliance Director acts as the Designated Harassment and Privacy Officer, responsible for receiving complaints, coordinating investigations, and overseeing resolution.

5. DESIGNATED HARASSMENT OFFICER CONTACT INFORMATION

Any individual who believes they are experiencing, witnessing, or have been subjected to harassment may contact the Designated Officer directly:

Designated Harassment & Compliance Officer

Bedros Sarkissian

Sarkissian Financial Group

4226 Boul Saint-Jean, Dollard-des-Ormeaux, QC H9G 1X5

Email: ComplaintResolution@SFG.ca / bedros@sfg.ca

Telephone: (514) 620-4226 extension 0

6. COMPLAINT RESOLUTION AND INVESTIGATION PROCEDURE

Any complaint or report will be handled promptly, objectively, and with strict confidentiality.

Step 1: Informal Resolution (Optional)

If the individual feels comfortable and safe doing so, they may inform the person involved directly that their conduct is unwelcome and must cease immediately. If this is not feasible or fails to stop the behaviour, formal reporting should be initiated.

Step 2: Filing a Formal Report or Complaint

A formal complaint must be submitted in writing to the Designated Officer using the attached form or via email. The complaint should include dates, locations, descriptions of incidents, witness names, and any supporting documentation (emails, messages, notes).

Step 3: Impartial Investigation

Upon receipt of the complaint:

- An acknowledgement of receipt is issued within **five (5) business days**.
- The Designated Officer (or an independent external investigator if necessary) conducts an impartial investigation, interviewing the complainant, respondent, and relevant witnesses.
- Both parties are treated with procedural fairness and respect.

Step 4: Findings and Corrective Measures

At the conclusion of the investigation, written conclusions are provided to both parties. If the complaint is substantiated, appropriate corrective and disciplinary measures will be implemented immediately. These may include mandatory training, formal reprimand, suspension, termination of employment/broker contract for cause, or severance of business relationships.

7. PROTECTION AGAINST REPRISALS AND CONFIDENTIALITY

Strict Confidentiality: All records, statements, and details pertaining to a harassment complaint will be treated as confidential and disclosed strictly on a need-to-know basis for investigation and resolution purposes.

Strict Prohibition of Reprisals: Any form of retaliation, threat, or penalty against an individual who files a complaint in good faith, expresses concerns, or participates as a witness in an investigation is strictly prohibited and constitutes a severe violation resulting in immediate disciplinary action up to dismissal.

8. EXTERNAL RECOURSE IN QUEBEC

This internal policy does not limit or prevent any individual from exercising their statutory rights under Quebec law, including filing a complaint with:

- **CNESST** (Commission des normes, de l'équité, de la santé et de la sécurité du travail): Complaints under the *Act respecting labour standards* must generally be filed within **two (2) years** of the last incidence of harassment. Website: www.cnesst.gouv.qc.ca | Tel: 1-844-838-0808.
- **CDPDJ** (Commission des droits de la personne et des droits de la jeunesse) for discrimination-based harassment.
- **Local Police / SPVM:** In cases involving criminal conduct, threats, or physical/sexual assault.

CONFIDENTIAL HARASSMENT INCIDENT REPORT FORM

Sarkissian Financial Group — Strict & Confidential

Full Name of Complainant:	Role / Department (or Client/Partner):
Telephone:	Email Address:
Name & Title of Respondent(s) (Person accused of misconduct):	
Description of Incidents (Dates, locations, context, and specific conduct):	
Witnesses / Supporting Evidence (Emails, messages, witnesses):	
Signature:	Date (YYYY-MM-DD):