



# POLICY ON THE PREVENTION OF WORKPLACE HARASSEMENT

INTENDED FOR EMPLOYEES AND THIRD PARTIES  
OF JUST FOR LAUGHS

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Effective date: May 31st, 2022  
Revision date: May 31st, 2022

Human Resources Department

# **JUST FOR LAUGHS**

## **POLICY ON WORKPLACE HARASSMENT**

### **1. PREAMBLE**

One of the fundamental objectives of Juste pour Rire/Just For Laughs (hereinafter “**JPR**”) is to ensure that all employees, no matter their hierarchical position, can work in a safe and healthy workplace where mutual respect prevails.

This policy is intended to prevent and stop all forms of harassment or conduct that may lead to harassment, and to promote a work environment where all employees are treated with dignity, psychological and physical integrity.

With this purpose in mind, JPR commits to take all reasonable steps required to prevent harassment in all its forms and, when such conduct is brought to its attention, to stop it.

Any behavior related to harassment may result in the imposition of disciplinary measures, which may go as far as dismissal.

### **2. OBJECTIVES**

This policy aims to:

- Offer and maintain a workplace free of harassment.
- Obtain the commitment of all people working in the organization to prevent and fight against workplace harassment.
- Establish the necessary mechanisms for prevention, reporting and diligent handling of complaints.

### **3. FIELD OF APPLICATION**

This policy applies to all employees, regardless of job title or hierarchical position in the company. It focuses on the working relationship between employees and their superiors as well as the relationships between employees, in the following places and contexts:

- workplaces, including telework places and communications transmitted or received in a work context, by any means, technological or otherwise.
- Any other place where people are likely to be in the course of their employment, including during the production of shows, festivals, filming, meetings, training, trips or social activities organized by JPR.

This policy also applies to situations of harassment from third parties with whom JPR has business relationships, such as artists, suppliers, subcontractors, and clients.

#### **4. DEFINITION OF HARASSMENT**

Psychological harassment refers to any vexatious behavior 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 result in a harmful work environment for the employee. For greater clarity, psychological harassment can take the form of words, acts or gestures of a sexual nature.

A single serious incidence of such behavior that has a lasting harmful effect on an employee may also constitute psychological harassment.

Psychological harassment also includes harassment related to discrimination on one of the grounds contained in Section 10 of the *Charter of Human Rights and Freedoms*, including gender identity, sexual orientation, race, physical appearance, religion, pregnancy, and disability.

The notion of harassment must be distinguished from other situations such as interpersonal conflict, work related stress, difficult professional constraints, or the normal exercise of management rights (management of attendance at work, organization of work, disciplinary action)

#### **5. PROHIBITED BEHAVIOURS**

Although not an exhaustive list, the types of behaviors specifically prohibited by this policy include:

- Bullying and cyberbullying
- Offensive or defamatory comments or gestures about a person or their work
- Intentional physical conduct of a sexual or intimidating nature such as touching, pinching or rubbing.
- Unwelcomed sexual propositions, suggestions or advances such as repeated requests for a date, after the person has indicated a lack of interest in previous requests or invitations.
- Preferential treatment or promises of preferential treatment in exchange for sexual favors.
- Gestures or remarks of a sexual nature.
- Displays or distribution in any other manner of material with sexual content that may be considered suggestive, degrading, obscene or pornographic.
- Improper jokes, displays of offensive photos or objects, physical force or threat of force, and insults.

"It's just a joke," "I'm teasing" or "Just playing" are not acceptable forms of defense. It is to the targeted person to determine what is offensive or not. Silence or even participation does not indicate that the conduct is welcomed or will be exempted from disciplinary measures.

The LIPT self-assessment questionnaire called "Leyman inventory of psychological terror" attached in Annex A is a good tool for assessing exposure to situations of psychological violence at work. It does not confirm whether you have been victim of

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psychological harassment at work but rather whether confirm if you have been victim of psychological violence at work which can indeed become psychological harassment.

## 6. REPRISALS

Any reprisal or retaliation against a person who makes a complaint under this policy or who participates in an investigation under this policy constitutes a transgression as serious as the harassment itself and will be dealt with accordingly.

In all cases of reprisal or retaliation, the victim may also use the complaint procedure set out below.

## 7. COMMITTEE

The complaint procedure set forth in this policy is managed by a committee (the "**Committee**") composed of the persons occupying the following positions:

- Vice-President of Human Resources
- Vice-President for Legal Affairs
- Chief Financial Officer

## 8. PROCESS FOR THE TREATMENT OF COMPLAINTS

Barring exceptional circumstances, the person who believes he or she is the victim of harassment has the obligation to act as soon as possible after occurrence of the event, for which he or she has recourse to the policy against harassment in the work place.

Whenever possible, the person who believes he or she is the victim of harassment (the "**Plaintiff**") through the behavior of another person (the "**Respondent**") must notify the Respondent and demand that such behavior ceases immediately. He or she should also note the date and details of the incident(s) and the steps took to try to resolve the situation.

If this first intervention is not desired or if the harassment continues, the person who believes he or she is being harassed must report the situation to the following email address: [zerotolerance@hahaha.com](mailto:zerotolerance@hahaha.com), using the form attached in Annex B if necessary and to meet with a member of the Committee of his/her choice so that the Committee examines the complaint.

In the event of a conflict of interest with a member of the Committee, the person can also report the situation to the following address: [legal@hahaha.com](mailto:legal@hahaha.com) or speak with a business partner from the human resources department.

The person who witnesses a situation of harassment is also invited to report it via the email address mentioned above.

## 9. PRINCIPLES OF INTERVENTION

The Committee is committed to:

- Take charge of the complaint or report as soon as possible
- Preserve the dignity and privacy of the persons concerned such as the person who made the complaint, the person who is the subject of the complaint and the witnesses
- Ensure that all persons concerned are treated with humanity, fairness and objectivity and that adequate support is offered to them

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- Protect the confidentiality of the intervention process, including information relation to the complaint or reporting.
- Offer the persons concerned to hold, with their agreement, a meeting with them in order to resolve the situation
- If necessary, undertake an investigation without delay and in an objective manner or if deemed more appropriate, delegate this responsibility to an external resource. The persons concerned will be informed of the conclusion of this process.
- Take all reasonable steps to resolve the situation and stop the harassment.

If, at the end of the investigation, the Committee considers the complaint well-founded, the Committee will decide on the measures to be taken to resolve the situation including appropriate disciplinary measures. Measures may range from reprimand to immediate dismissal, regardless of the Respondent's job title or position, status or number of years of service with JPR.

The Committee shall then add to the Respondent's employee file a sealed investigation report and the conclusions.

If the Committee considers the complaint unfounded, no disciplinary measure will be taken against the Respondent, but the Committee shall retain in its custody, in a confidential file, the sealed investigation report and forwards a copy to the Respondent.

In all cases, the Committee informs the Plaintiff and the Respondent of the findings of the investigation and the disciplinary or other measures that may be taken if necessary.

## **10. HARASSMENT OF A JPR EMPLOYEE BY A PERSON WHO IS NOT A JPR EMPLOYEE**

Any JPR employee who believes that he or she is being harassed by anyone other than an employee, such as an artist, supplier, subcontractor, customer or any other person with whom JPR has a business relationship, has an obligation to report the situation to the following address: [zerotolerance@hahaha.com](mailto:zerotolerance@hahaha.com) using the form in Annex B if necessary in order to contact a Committee member.

The Committee will take all necessary measures so that JPR respects its obligations to support and provide assistance to the Plaintiff. The policy will be applied with the necessary adjustments.

## **11. HARASSMENT BY A JPR EMPLOYEE OF A PERSON WITH WHOM JPR HAS A BUSINESS RELATIONSHIP**

It is forbidden for any JPR employee to harass artist, supplier, subcontractor, client or any other person with whom JPR has a business relationship. This person has to report the situation to the following email address: [zerotolerance@hahaha.com](mailto:zerotolerance@hahaha.com). The policy will be applied with the necessary adjustments.

## **12. SLANDEROUS AND ABUSIVE ACCUSATIONS**

JPR takes very seriously any allegation of harassment that is slanderous or abusive and will act accordingly. In such a case, measures ranging from reprimand to immediate dismissal may be taken against the Plaintiff, regardless of the Plaintiff's job title or position, status or number of years of service with JPR.

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## 13. CONFIDENTIALITY

In order to protect the interests of the Plaintiff, the Respondent and any witness of harassment, all persons involved in the informal or formal process and the investigation shall keep such process and investigation strictly confidential, except to the extent that the disclosure of information is necessary for the purposes of enforcing this policy, a disciplinary process or the law.

## 14. LEGAL FRAMEWORK

- *Charter of human rights and freedoms*
- *Civil Code of Quebec*
- *Act respecting Labour Standards*
- *Act respecting Occupational Health and Safety*
- *Act respecting Industrial Accidents and Occupational Diseases*

## 15. REVIEW

This policy will be revised as needed.

**ANNEX A**

**Self-assessment questionnaire**

Attached is a LIPT self-assessment questionnaire, called the “Leymann Psychological Terror Inventory”. This questionnaire was developed by Leymann in 1996 and translated into French in 2006.

This questionnaire evaluates exposure to situations of psychological violence at work. It does not confirm whether you have been the victim of psychological harassment at work, but rather whether you have suffered psychological violence at work, which can indeed become psychological harassment.

Start of the quiz

Have you been confronted at work with any of the following situations in the past 12 months?  
Please check the box(es) that apply to your situation

**1- In regard to work relationships**

- 1- Your superior restricts the opportunity for you to express yourself
- 2- You are constantly interrupted
- 3- Colleagues restrict your opportunity to express yourself

*Pressure on you is applied in various ways*

- 4- You are yelled at and loudly scolded
- 5- Your work is constantly criticized
- 6- There is constant criticism about your personal life
- 7- Harassment on the phone
- 8- Oral threats are made
- 9- Written threats are sent

*You are denied contact in the following manner*

- 10- Contact is denied through contemptuous looks or gestures
- 11- Your presence is ignored by exclusively addressing others

**2- You are systematically isolated**

- 12- People do not speak to you anymore
- 13- You cannot talk to anyone; access to others is denied
- 14- You are relocated to another room far away from colleagues
- 15- Colleagues are forbidden to talk to you
- 16- You are treated as if you are invisible
- 17- You are only contacted in writing

**3- Your duties are modified as if by punishment**

- 18- There are no special tasks for you; you are without occupation

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- 19- You are given meaningless tasks to carry out
- 20- You are given jobs that are below your qualifications
- 21- You are continually given new tasks
- 22- You are given tasks that are humiliating
- 23- You are given tasks that are way beyond your qualifications

#### **4- Attacks on your person**

- 24- People talk badly about you behind your back
- 25- Unfounded rumors about you are circulated
- 26- You are ridiculed in front of others
- 27- You are treated as if you are mentally ill
- 28- You are forced to undergo a psychiatric evaluation
- 29- Your handicap is ridiculed
- 30- People imitate your gestures, walk, or voice to ridicule you
- 31- Your political or religious beliefs are ridiculed
- 32- Your nationality is ridiculed
- 33- You are forced to do a job that affects your self-esteem
- 34- Your efforts are judged in a wrong and demeaning way
- 35- Your decisions are always questioned
- 36- You are called by demeaning names
- 37- Sexual innuendoes are present

#### **5- Violence and threats of violence**

- 38- You are forced to do tasks that are harmful to your health
- 39- Despite your poor health, you are forced to do harmful tasks
- 40- Threats of physical violence are made
- 41- Light violence is used to threaten you
- 42- Physical abuse is present
- 43- Causing general damages that create financial costs to you
- 44- Damage is done to you in your private life or in the workplace
- 45- Outright sexual harassment is present

#### **6- Other violations or situations you want to describe:**

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If you have not faced any of the previous situations (questions 1 to 6) in the last 12 months, please go directly to questions 13 and 14

#### **7- How often have you been confronted with one or more of these situations (questions 1 to 6) in the last 12 months**

- 1- Every day
- 2- Almost every day
- 3- At least once a week
- 4- At least once a month
- 5- Rarely



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**8- For how long you have been confronted to these situations: years \_\_\_ months \_\_\_**

**9- Do you still face these situations today?**

- 1- Yes, still confronted today
- 2- No, previously confronted in the same workplace
- 3- No, previously confronted in a previous workplace

**10- Who in this period has gone against you?**

- 1- Colleagues
- 2- Hierarchical superior(s) or person(s) with a superior hierarchical position to yours
- 3- Subordinate(s)

**11- Gender of the person(s)**

- 1- Man, or Men
- 2- Woman or Women
- 3- Both Men and Women

**12- Do you have a person you could turn to, to talk about these problems?**

*Yes*

- 1- Colleague
- 2- Superior
- 3- Responsible of human resources
- 4- Union representative
- 5- Labor inspection or lawyer
- 6- Occupational physician
- 7- Another doctor
- 8- Social worker, nurse
- 9- Friends or acquaintance outside the company
- 10- Family members, parents

*No*

- 11- No, I don't have anyone I could turn to, but I would have liked to
- 12- No, I don't have anyone I could turn to, but I needed it

**13- Psychological violence at work can be defined by a situation where a person is subject to hostile behavior from one or more people in the work environment, which aim continuously and repeatedly to hurt, to oppress, to mistreat or to exclude or isolate the person, for a long period of time.**

Using this definition, do you consider that you have been the subject to psychological

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violence at work in the last 12 months?

- 1- Yes
- 2- No

If so, what do you attribute these hostile behaviors towards you to?

- 1- A bad general atmosphere at work
- 2- Poor work organization
- 3- Management and supervision problems
- 4- Competition problems between people
- 5- Envy or jealousy
- 6- An unresolved conflict or dispute at work
- 7- They want me to leave the company
- 8- I am different from others because of my age, gender, nationality or disability
- 9- I don't know

**14-** Using the previous definition (question 13), do you think you have witnessed psychological violence towards another person at your workplace in the last 12 months?

- 1- Yes
- 2- No

Results interpretation
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According to Leymann's definition, a person who checked one or more boxes in questions 1 to 5 and who mentions having experienced this or these situations at least once a week, for 6 months is considered exposed to psychological violence at work.

It should be noted that according to labor standards, a single serious behavior can be considered psychological harassment. This will be the case in particular in the event of sexual assault or physical attack.



ANNEX B

Harassment complaint form

Information on the alleged victim

Name: \_\_\_\_\_ Telephone: \_\_\_\_\_

Position/job: \_\_\_\_\_ Workplace: \_\_\_\_\_

Information on the person who is the subject of a complaint

Name: \_\_\_\_\_

Position/job: \_\_\_\_\_

**What happened?** (Describe the facts, words and actions and state what happened before, during and after each event reported)

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**When?** (Specify dates and circumstances of the event(s) reported.)

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ANNEX B

**Location?** (Specify where the event(s) took place.)

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**Is this the first event?**        **yes**        **no**

**If not, how often does this happen?**    \_\_\_\_\_

**And what are the dates of these events?**    \_\_\_\_\_  
\_\_\_\_\_

**What steps have you taken to try to resolve the situation?**

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**What are your expectations following the submission of this complaint?**

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**Other comment(s) that you feel are worth mentioning:**

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The facts stated here in this form are true, to the best of my knowledge.

\_\_\_\_\_  
**Signature of employee**

\_\_\_\_\_  
**Date**