

BPA understands that its customers, staff and partners come from diverse communities and that changing demographics have implications for access to programs and services.

BPA is committed to diversity and the elimination of all forms of oppression, racism, heteronormativity, homophobia, transphobia, ableism, sexism and classism, for example.

As such, BPA prohibits discrimination and harassment and protects the right of employees to work and grow in a healthy environment, free of any hate activity based on race, age, ancestry, citizenship, belief (religion), colour, disability, ethnic origin, family status, gender identity, literacy level, marital status, place of origin or political affiliation.

We understand that members of various communities face barriers to services, and we are committed to exerting a positive influence to eliminate these barriers.

BPA will strive to ensure that its structure (staff, management and board of directors) reflects the diversity of the community, encouraging equal access for all.

## Policy

### Scope of the policy

This policy applies to all BPA trainees, employees, directors and shareholders and concerns all their actions and interactions, both at work and outside work, when these actions and interactions are public, including on social media.

### Roles and responsibilities

It is the responsibility of all BPA trainees, employees, directors and shareholders to familiarize themselves with BPA's policies and to act accordingly and in compliance with the obligations and recommendations contained therein.

They are also responsible for promoting the values of openness and inclusion set out in this Policy.

The Ethics Committee's mandate includes ensuring compliance with this Policy and investigating and recommending sanctions, where appropriate, in the event of a breach of any of its provisions.

### Prohibited and expected behaviour

BPA will not tolerate any form of exclusion based on grounds of discrimination such as age, social status, disability, gender identity or expression, language, sexual orientation, race, colour, ethnic origin, religion, political beliefs, sex or any other ground described in the federal and provincial Charters of Rights and Freedoms.

Conversely, BPA encourages the following behaviours:

- Respecting each individual and each member of a particular community, whatever it may be;
- Being open-minded, empathetic and attentive to individual needs and realities;
- Proposing, implementing and/or facilitating the implementation of accommodation measures for people who request them;
- Avoiding unconscious biases and prejudices and promoting positive, constructive measures and practices in terms of equity, diversity and inclusion.

## Hiring and employment

BPA actively recruits candidates from diverse backgrounds and positions itself as an ally in ending oppression in our communities. The company will take steps to ensure cultural and racial sensitivity in its services.

BPA accepts anyone who identifies as a woman, a man, a trans woman, a trans man, a two-spirit person or a non-binary person. This applies to all aspects of employment.

BPA ensures that its operating procedures address systemic barriers to full community involvement. This includes publishing new job offers and programs in various media, as well as recruiting members of diverse communities to our Board of Directors and staff.

## Services

BPA makes its services accessible to members of diverse communities without discrimination and will ensure that services are provided in a manner free of harassment, discrimination or prejudice.

## Training

BPA ensures that those responsible for delivering the company's services have the knowledge, understanding and skills to work with and serve members of diverse communities, particularly equity-minded communities, and requires its employees to attend training sessions offered by the organization and other service providers.

Wherever possible, BPA allocates annual training costs on the subject of equity and diversity within the budgets of its UniversiT training committee.

BPA does not allow discriminatory incidents or behaviour and will deal with such matters as quickly as possible.

## Procedures

### Complaints

Employees can file complaints about conditions they consider discriminatory or harassing. In the event of a complaint, BPA will comply with the following standards:

- Applicable provisions of the Code of Ethics and policies on the prevention of violence in the workplace, the prevention of psychological, sexual and discriminatory harassment in the workplace and the handling of complaints;
- Individuals may file a complaint in accordance with the Code of Ethics and the policies described above;
- Any complaint must be filed with the Ethics Committee or one of its members, who will deal with it diligently and conduct an investigation if necessary;
- Retaliation against employees for filing a complaint or providing information about a complaint is prohibited. Allegations of retaliation are subject to the same procedures and consequences as complaints of discrimination.

### Investigations

The Ethics Committee will initiate an investigation procedure in accordance with the rules set out in the Code of Ethics and policies on the prevention of violence in the workplace, the prevention of psychological, sexual and discriminatory harassment in the workplace and the handling of complaints.

The Ethics Committee may appoint one of its members or a third party as investigator and will inform the person(s) named in the complaint as soon as possible after receiving it. Each person named in the complaint has the right to respond to the allegations made against them.

People mentioned as witnesses in the complaint will be interviewed.

### **Redress: settlement and disciplinary action**

At the end of the investigation, the investigator will draw up a written report describing the findings of the investigation.

The investigator may attempt mediation to resolve a complaint at any time before or during the investigation, with the permission of the complainant and the respondent. Every effort will be made to reach an amicable resolution that is acceptable to both the complainant and the respondent.

If a discriminatory or racist incident is identified, disciplinary action up to and including dismissal may be taken. Specifically, the investigator may recommend one of the following measures, depending on the seriousness of the findings:

- Require the respondent to apologize verbally or in writing;
- Issue a verbal or written reprimand with a copy to the respondent's personnel file; or
- Recommend further disciplinary action, up to and including dismissal.

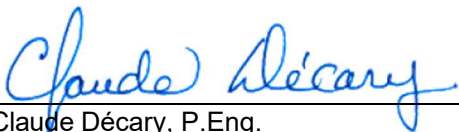
If the findings do not support the complaint, BPA may:

- Provide training or better communication; or
- Recommend that no further action be taken.

### **Confidentiality**

All parties to a complaint must maintain confidentiality.

The investigator must only disclose information to those who have a legitimate need to know.

A handwritten signature in blue ink that reads "Claude Décary".

Claude Décary, P.Eng.  
Chairman of the Board of Directors