



Corporate policy

Prevention of harassment and discrimination in the workplace

02	Guiding principles
03	Goal and scope
04	Definitions
06	Company's commitments
07	Examples of harassment and discrimination
09	Obligations and compliance audit
09	Reporting
10	Accommodation requests
10	Managing complaints
11	Sanctions

Guiding principles

The adoption by Champion Iron Limited (Champion) and its subsidiaries, including Quebec Iron Ore (QIO), of a policy to prevent harassment and discrimination in the workplace is part of its commitment to offer a healthy and respectful work environment to all of its employees.

Through this policy, Champion and its subsidiaries assert that they will not tolerate any form of harassment or discrimination towards and between their employees and that they will prevent and stop any form of psychological or sexual harassment, including any type of discriminatory harassment. It also aims to establish the intervention principles applied when a harassment complaint is filed or a harassment situation is reported to a company representative.

This policy complies with Quebec's labour standards act. Whenever this policy is applied in Quebec, it must always be applied in compliance with Quebec's applicable legislation and regulations, in particular the Charter of Human Rights and Freedoms.

Goal

This policy serves as a framework aimed at providing a work environment free from harassment and discrimination at Champion and its subsidiaries, including QIO. It is also used to set out the orientations and commitments made by the company for this purpose.

- Through this policy, Champion and its subsidiaries pursue the following specific goals:
- ➔ Prevent and stop all conduct of harassment and discrimination.
 - ➔ Provide a work environment in which all individuals are treated with dignity and respect.

Scope

This policy applies in the following places and contexts:

- ➔ All workplaces.
- ➔ All common areas.
- ➔ Any other place where people need to be in the course of their employment (e.g. meetings, training, social activities organized by the company, trips, at the cafeteria, places of entertainment and accommodations provided by the company).

The policy also applies to communications by any technological medium or other means (e.g. social media, emails, text messages, posters or letters).

The company encourages its partners and subcontractors to adopt a similar policy within their own company.

Quebec definitions

This policy covers all forms of harassment: psychological, physical, sexual and discriminatory harassment.

In accordance with Quebec's Act respecting Labour Standards, this policy means by "harassment" vexatious conduct which manifests itself through either behaviour, words, actions or repeated gestures, which are hostile or unwanted, or undermine the dignity or the psychological or physical integrity of the employee and which result in a harmful work environment for an individual.

For greater certainty, psychological harassment includes such behaviour in the form of verbal comments, actions or gestures of a sexual nature.

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

Discriminatory harassment refers to any harassment conduct based on one of the prohibited grounds of the Quebec Charter of Human Rights and Freedoms, including: 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 any means to compensate this handicap.

Australian definitions

To the extent that this policy applies in Australia, the following definitions apply on this territory.

Unlawful discrimination occurs when a person is treated less favourably because of a personal characteristic that is protected under Australian anti-discrimination legislation (at the state/territory or federal level). The protected grounds/attributes include sex, race, colour, descent or national or social origin, impairment/disability, age, pregnancy or potential pregnancy, breast feeding, marital or relationship status, status as a parent or carer, lawful sexual activity, sexual orientation, gender identity, physical features, industrial activity or trade union membership, political or religious beliefs or activities, intersex status

and personal association with someone who is identified by reference to any of these attributes. There are two types of unlawful discrimination: direct discrimination and indirect discrimination.

Harassment is behaviour (e.g. oral, written or physical) that offends, humiliates or intimidates another person in situations in which a reasonable person, taking all circumstances into consideration, would have anticipated that the other person would be offended, humiliated or intimidated. Harassment may constitute unlawful discrimination if it is based on an attribute protected by the legislation, such as race, gender or disability. Harassment on other grounds may also constitute bullying.

Sexual harassment is conduct of a sexual nature that is unwelcomed and which offends, humiliates or intimidates another person. A single act or continuing courses of conduct can both constitute sexual harassment. Sexual harassment is unlawful under state/territory and federal law in Australia.

Bullying is repeated unreasonable behaviour by an individual or a group that creates a risk to health and safety. This includes physical or psychological behaviour that intimidates, offends, degrades or humiliates a worker. An isolated incident is usually not considered bullying, but may still constitute inappropriate behaviour that leads to action being taken against the offending party.

Company's commitments

The company is committed to having zero tolerance for any form of psychological or sexual harassment and discrimination by or against its employees. The company undertakes to use reasonable means to:

- Develop mechanisms and tools to prevent harassment and discrimination, including the following actions:
 - Set up a complaints management procedure;
 - Provide adequate support to employees affected by a situation of harassment or discrimination;
 - Act quickly, whenever possible, when situations are brought to light;
 - Impose administrative and / or disciplinary measures in the event of non-compliance with this policy.

- Analyze the work environment to identify situations at risk of leading to harassment or discrimination.
- Provide a work environment free from all forms of harassment and discrimination to protect the dignity of the employees as well as their physical and psychological integrity.
- Disseminate the policy by making it easily accessible on the company website and posting it in the company workplaces.
- Promote certain values such as respect between individuals.
- Regularly monitor the policy's application to assess the achievement of results and make necessary adjustments.



Examples of psychological harassment

- ➔ Bullying (including cyber-bullying), threats and isolation.
- ➔ Unsolicited comments about a person's personal life.
- ➔ Constantly ignoring a person's ideas.
- ➔ Offensive or intimidating calls or emails.
- ➔ Ignoring a person, isolating a person from colleagues.
- ➔ Threat of violence or intimidation.
- ➔ Insulting, making a misplaced joke, or otherwise intimidating someone.
- ➔ Accusing another of unfounded facts in front of others (defamatory words and gestures).
- ➔ Fuelling or not denying unfounded rumors.
- ➔ Denigrating or acting in such a way as to ridicule or humiliate a person.
- ➔ Talking or laughing behind someone's back.
- ➔ Posting or distributing compromising photos or offensive material.

Examples of sexual harassment

- ➔ Any form of unwanted attention or advance with a sexual connotation, including the following examples:
 - ➔ Unwelcomed remarks;
 - ➔ Jokes that cause discomfort or embarrassment;
 - ➔ Sexual solicitations;
 - ➔ Sexual insults or sexist remarks;
 - ➔ Posting pornographic images or any other offensive or derogatory material;
 - ➔ Phone calls of a sexual nature;
 - ➔ Insinuations or sarcasm;
 - ➔ Subtle allusions that can go as far as open dating requests.
- ➔ All unwanted sexual acts, including:
 - ➔ Pinches;
 - ➔ Hugs;
 - ➔ Caresses;
 - ➔ Slaps;
 - ➔ Concupiscent looks;
 - ➔ Rubbing;
 - ➔ Touching;
 - ➔ Kisses.

Examples of discriminatory harassment or discrimination

- Making unwanted comments about race, ethnic or national origin, accent, or religion.
- Refusing to hire or promote on the basis of one of the prohibited grounds of discrimination.
- Joking or teasing a colleague about his or her culture or customs.
- Isolating a colleague because of his or her gender, race, sexual orientation, etc.
- Derogatory attitude towards an employee due to her pregnancy.

Examples that do not constitute harassment

- The exercise by the company of its management rights, in particular:
 - Performing daily management of discipline and performance at work;
 - Controlling established production requirements and general work performance (absenteeism, health and safety, compliance with rules).
- Personality conflicts between colleagues or between an employee and a supervisor.
- Demanding or stressful working conditions.
- Difficult professional constraints.



Obligations

All company employees have the obligation to take the necessary measures to prevent all forms of harassment or discrimination. When a behaviour is brought to the attention of a manager, he/she must take the necessary measures to stop the situation.

All employees must also help maintain a work environment free from harassment and / or discrimination, ensure that they maintain respectful relationships with colleagues and supervisors, participate in mechanisms put in place by the company to prevent and stop harassment and /or discrimination and to report as soon as possible any situation related to harassment or discrimination to their immediate supervisor or a representative of the Human Capital group.

Compliance audit

The monitoring of this policy's application within the company is verified through an audit program implemented on a regular basis. This makes it possible to target trends, non-compliances, opportunities for improvement, inefficiencies and other shortcomings that prevent or could limit the optimal implementation and compliance with the provisions of this policy. This approach allows the company to make the relevant adjustments to improve its processes and ways of doing things.

Reporting

All employees have a duty to promptly report to their immediate supervisor or to a representative of the Human Capital group any situation of discrimination or any other situation through which this policy, laws or regulations appear to have been violated, without any fear of reprisals if the report is made in good faith.

Employees can also formulate an accommodation request for any reason covered by the Quebec Charter of Human Rights and Freedoms.

When a problematic situation or a request for accommodation cannot be resolved through the regular channels of communication due to, for example, a discomfort or a concern, the

person involved can submit a report in complete confidentiality to an independent third party in order to ensure the highest diligence and impartiality in the processing of reports.

Reports can be made using one of the following means :

- ➔ a secure webform at www.ChampionIronWhistleblowerService.deloitte.com;
- ➔ an email to ChampionIronWhistleblowerService@deloitte.com;
- ➔ by calling the toll-free number 1-833-435-0757 ¹.

Each report is taken seriously by the company and may be investigated.

¹ Calls within Australia can be made through a dedicated toll-free number at 1800 984 123.

Accommodation requests

Under the Quebec Charter of Human Rights and Freedoms, everyone has the right to the recognition and exercise, in full equality, of human rights and freedoms, without distinction, exclusion or preference based on race, colour, sex, gender identity or expression, pregnancy, sexual orientation, marital status, age except to the extent provided for by law, religion, political beliefs, language, ethnic or national origin, social condition, handicap or the use of a means to overcome this handicap.

Any employee who wants to make an accommodation request on the basis of the above grounds must make such request in writing to bl_accommodements@MineraiFerQuebec.com, briefly explaining the reasons for the request. All requests will be thoroughly reviewed and the company will comply with them to the extent of undue hardship. The employee must be committed to collaborating in developing appropriate solutions and the company reserves the right to ask for relevant documentation supporting any request.

Managing complaints

Employees wishing to file a discrimination or harassment complaint must abide by the following steps:

STEP 1
Whenever possible, a person who believes they are being sexually or psychologically harassed should first inform the person concerned that their behaviour is undesirable and that they must stop it. This person should also note the date and details of the incidents and the steps taken to try to resolve the situation. *Go directly to Step 2 if this first intervention is not desired.

STEP 2
If the behaviour continues, notify the immediate supervisor or a representative of the Human Capital group. It is also possible to file a complaint in complete confidentiality by filling out a secure webform at www.ChampionIronWhistleblowerService.deloitte.com, sending an email to ChampionIronWhistleblowerService@deloitte.com or by calling the toll-free hotline at 1-833-435-0757.

The complaint must be, as much as possible, contemporary to the alleged facts. In addition, the company reserves the right to require a formal written complaint detailing any allegations. It should be noted that the Champion's Human Capital group will be informed of any complaints.

The company will handle each complaint while preserving, as much as possible, the confidentiality of the information disclosed. However, in some cases, confidentiality may not be fully preserved. For example, when required by law or when handling the complaint.

STEP 3
The company will take charge of the complaint as quickly as possible and will offer to organize a meeting for those concerned in order to resolve the situation. However, the meeting is optional and the persons concerned may opt out.

STEP 4
If the situation is not resolved after Step 3 or if the people concerned do not wish to participate in a meeting, the company will conduct an investigation within a reasonable delay. Depending on the circumstances, an external firm may be mandated to conduct the

investigation. The persons concerned will then be informed of the existence of this investigation and of its conclusions.

STEP 5
In light of the results of the investigation, the company will take all reasonable steps to resolve the situation, including appropriate disciplinary or administrative measures, including:

- Written warning;
- Training or coaching;
- Suspension without pay;
- Transfer or demotion;
- Dismissal for just cause.

The company will ensure that a person who lodges a complaint in good faith does not suffer any reprisals. However, when a complaint is made without merit (meaning false, frivolous, vexatious or filed in bad faith), the company will intervene and impose appropriate disciplinary or administrative measures. In all cases, the Human Capital group will be informed of the outcome of the complaint and of the sanction(s) imposed, if applicable.

Sanctions

Anyone working for Champion or its subsidiaries who does not comply with this policy could be subject to disciplinary or administrative measures, up to and including dismissal for serious reasons.



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