

Corporate policy

# **PREVENTION AND HANDLING OF HARASSMENT AND DISCRIMINATION IN THE WORKPLACE**

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May 2025

# GUIDING PRINCIPLES

The adoption by Champion Iron Limited and its subsidiaries (the “Company” or “Champion and its subsidiaries”), including Quebec Iron Ore Inc. (“QIO”), of a **policy to prevent and address 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 or any other person associated with them (representative, customer, user, supplier, subcontractor, visitor or other) 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 Québec’s Labour Standards Act. Whenever this policy is applied in Québec, it must always be applied in compliance with Québec’s applicable legislation and regulations, in particular the Charter of Human Rights and Freedoms.

Champion and its subsidiaries undertake to have this policy reviewed annually by the executive committee and the chief executive officer of the Company.



# GOAL

This policy serves as a framework aimed at providing a work environment free from harassment and discrimination for employees of Champion and its subsidiaries, including QIO, and any other person associated with them (representative, customer, user, supplier, subcontractor, visitor or other), and 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 work-related psychological or sexual harassment, including harassment from external sources.
- Provide a work environment in which all individuals are treated with dignity and respect.
- Indicate the means in place to prevent harassment, including the information and training programs offered.
- Establish procedures for handling complaints and problem situations that are brought to their attention, or to their designated representatives, by way of reporting.

# SCOPE

This policy applies to all employees of Champion and its subsidiaries in the following places and contexts:

- All workplaces, including remote-work places, where applicable.
- 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).



# QUÉBEC DEFINITIONS

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

In accordance with Québec'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.

This policy defines "sexual harassment" as any unwanted conduct, comment, gesture or contact that is based on sex, sexual orientation, gender identity or gender expression and is likely to offend or humiliate an individual or that may, on reasonable grounds, be interpreted by an individual as placing conditions of a sexual nature on continued employment or an opportunity for training or advancement.

Discriminatory harassment refers to any harassment conduct based on one of the prohibited grounds of the Québec 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 for this handicap.

Lastly, the policy prohibits any act of incivility, i.e. any conduct that violates the standards of mutual respect, cooperation, politeness, courtesy and good manners expected in a workplace and that has negative repercussions on individuals and, consequently, on the work environment.



# 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 antidiscrimination 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, breastfeeding, 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 the conduct of a sexual nature that is unwelcome 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.



# EXAMPLES OF PSYCHOLOGICAL HARASSMENT

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- Bullying (including cyberbullying), 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 rumours.
- 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

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**Any form of unwanted attention or advance with a sexual connotation, including the following examples:**

- Unwelcome 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

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- 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

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- 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.





# METHODS AND TECHNIQUES USED TO IDENTIFY, CONTROL AND ELIMINATE RISKS OF PSYCHOLOGICAL HARASSMENT, INCLUDING GESTURES OF A SEXUAL NATURE

The Company is committed to having zero tolerance for any form of psychological or sexual harassment and discrimination towards or between its employees or any person associated with it (representative, customer, user, supplier, subcontractor, visitor or other) as described in section 04 “Definitions”. The Company undertakes to take the necessary steps to provide a work environment free of all forms of harassment, in order to protect the dignity as well as the psychological and physical integrity of individuals.



**In accordance with its legal obligations, the Company implements measures to identify, control and eliminate the risks of psychological or sexual harassment, in particular by:**

- Disseminating this policy by making it easily accessible on the intranet and by posting it in the workplace;
- Maintaining continuous vigilance with regard to risks and risk factors likely to generate situations of harassment, in particular, the situations mentioned in the following sections;
- Ensuring that everyone understands and respects the policy;
- Promoting certain values such as respect between individuals;
- Regularly informing employees of their roles and responsibilities in preventing harassment, particularly during company social events;
- Implementing a training and awareness program for employees and for those designated to receive and handle complaints and reports, including the “CHP0001 - Prevention of harassment and discrimination” training (CHP0001 - Prévention du harcèlement et de la discrimination), and integrating this training into onboarding training;
- Consulting with employees on situations specific to their workplace that may create conditions that could lead to harassment;
- Holding meetings with departing employees to find out the reasons for their departure;
- Implementing a diligent process for handling complaints and reports.
- Providing appropriate support to employees affected by harassment or discrimination;
- Acting quickly, wherever possible, when situations are brought to its attention;
- Imposing administrative and/or disciplinary measures in the event of non-compliance with this policy.

The Company undertakes to integrate this prevention of harassment and discrimination in the workplace policy and all measures arising from it into the occupational health and safety prevention program or action plan, to review this policy at least once a year and to communicate any changes to employees.



# INFORMATION AND TRAINING PROGRAMS

The Company is implementing a harassment training program.

This training [CHP0001 - Prevention of harassment and discrimination] will cover the following elements in particular:

- The elements and mechanisms set out in this policy;
- Ways to recognize, minimize, prevent and stop the various forms of harassment and discrimination in the workplace;
- Promotion of civility and respect in the workplace;
- Roles and responsibilities of employees in the event of harassment.

All new employees will receive training on psychological harassment and discrimination within six (6) months of their employment start date.

All employees involved in handling a complaint or report will receive specific training on best practices in handling complaints and reports at least once every three (3) years.

Lastly, refresher training will also be offered to all employees in connection with this policy as required, and at least every three (3) years.



# EMPLOYEE CONDUCT AT SOCIAL EVENTS

This policy applies at all times during social events, even if they take place outside of the workplace. Any employee who participates in social activities that are directly or indirectly related to work, either during or outside regular working hours, must at all times adopt conduct and attitude of civility and be free from all forms of discrimination and harassment.

More specifically, during social events, all company employees must at all times act in such a way as to promote civility and respect, both with other company employees and with third parties.

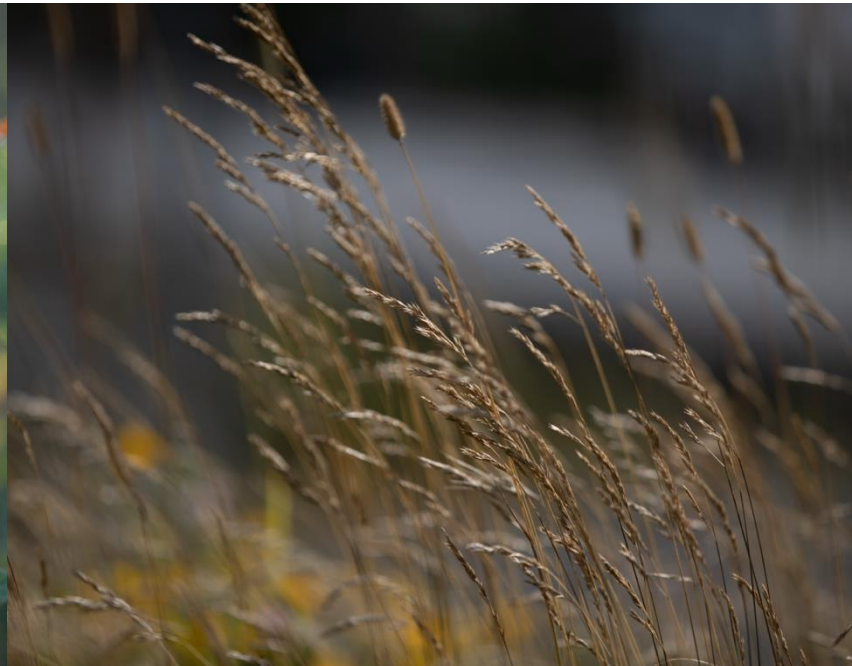
When an employee witnesses conduct that contravenes this policy, whether directed at an employee of the Company or a third party, even at work-related social events, they must report it to the person designated in this policy.



# OBLIGATIONS, ROLES AND RESPONSIBILITIES OF EMPLOYEES

All company employees have the obligation to take the necessary measures to prevent all forms of harassment and/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 to the person designated by the Company to receive and handle complaints and reports.





# 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-compliance, 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 a representative designated by the Company or one of the designated person 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 Québec 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, 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 web form at  
[www.ChampionIronWhistleblowerService.deloitte.com](http://www.ChampionIronWhistleblowerService.deloitte.com);
- An email to  
[ChampionIronWhistleblowerService@deloitte.com](mailto:ChampionIronWhistleblowerService@deloitte.com);
- By calling the toll-free number from Canada at  
**1-833-435-0757**.  
Calls within Australia can be made through a dedicated toll-free number at 18 0098 4123.
- Each report is taken seriously by the company and may be investigated.



# Designated Person

The person designated by the Company to receive and handle complaints and reports are as follows:

**Claudia Cordova Stolzembach,**  
Human Resources Director  
(Corporate)  
[drh@mineraiferquebec.com](mailto:drh@mineraiferquebec.com)  
**514 316-4858, #1040**

## **This person must mainly:**

- Inform employees about this policy;
- Receive complaints and reports;
- Evaluate each request and recommend appropriate actions or interventions (e.g., individual meetings, mediation, investigation) depending on the context;
- Determine who will be the competent person in charge of the intervention (internal intervener or external firm);
- Follow up to ensure that the people concerned are adequately supported and that the intervention has achieved the desired effects.

## **The Company:**

- Will ensure that the designated person to receive and handle complaints and reports are duly trained to assume the responsibilities entrusted to them and that they will have the necessary skills and tools at their disposal for handling and following up on complaints or reports, particularly with regard to assessing complaints alleging harassment, with a view to recommending an administrative investigation;
- Will free up working time so that designated person can carry out their assigned duties.





# ACCOMMODATION REQUESTS



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Under the Québec 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 a request in writing to [bl\\_accommodements@MineraiFerQuebec.com](mailto: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.

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# COMPLAINTS HANDLING PROCESS

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

## STEP 1

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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

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If the individual who has engaged in conduct contrary to the provisions of the policy (the “Respondent”) continues to do so, the person who believes he or she has been the victim of harassment (the “Complainant”) may file a formal written complaint against the Respondent and forward it to one of the designated person under this policy.

At this point, the immediate supervisor or a representative of the Human Resources Department and one of the designated person must be notified. It is also possible to file a complaint in complete confidentiality by filling out a secure web form at

[www.ChampionIronWhistleblowerService.](http://www.ChampionIronWhistleblowerService.deloitte.com)

[deloitte.com](http://deloitte.com), sending an email to

[ChampionIronWhistleblowerService@deloitte.com](mailto: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 and be submitted using the official complaint form. In addition, the Company reserves the right to require a formal written complaint detailing any allegations. It should be noted that the Company’s Human Resources Department will be informed of any complaints. At any time, assistance measures may be put in place, such as a conciliation service or any other measure deemed appropriate, as the case may be, by one of the designated person.

For the purposes of this policy, contact details for designated person are given in section 12 “Designated person” of this policy.



# COMPLAINTS HANDLING PROCESS

## STEP 3

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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. In addition, at the stage of analyzing the admissibility of the complaint, the designated person must:

- Meet with the Complainant to advise him or her of the complaint handling procedure, the confidentiality obligation and to gather details about the complaint (day, time, place, circumstances, facts, documents and witnesses);
- Analyze the admissibility of the complaint and decide on the admissibility of allegations under the policy
- Inform the Complainant of the decision regarding the admissibility of the complaint and the next steps, if any.

If the allegations are found to be admissible, the designated person must, within a reasonable time, briefly inform the Respondent of the allegations against him or her and the next steps to be taken.

## STEP 4

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If the situation is not resolved after Step 3 and for complaints deemed admissible, the Company will conduct an investigation within a reasonable delay. Depending on the circumstances, an external firm may be mandated to conduct the investigation.

- If the investigation is conducted by an outside firm, the designated person under this policy will decide on the parameters of the investigation mandate jointly with the outside firm's investigator;
- The investigation will be carried out by the external firm's investigator, as soon as possible, depending on his or her availability and that of the persons concerned, as well as on the complexity of the case;



# COMPLAINTS HANDLING PROCESS

## STEP 4 (cont.)

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- The investigation will be carried out diligently and impartially while respecting confidentiality. However, absolute confidentiality cannot be guaranteed by the Company;
- If necessary, the investigator can retain the services of another person to help with the investigation;
- Individuals identified as needing to be interviewed by the outside firm's investigator will be interviewed individually to obtain their version of the facts. Unionized personnel may ask to be accompanied by a union representative or their professional association, if applicable. Under no circumstances may they be accompanied by anyone other than the above-mentioned representatives. In order to protect the confidentiality and integrity of the process, non-unionized personnel may not be accompanied during the investigation;
- The people interviewed by the outside firm's investigator, as well as any representatives, will be required to sign a confidentiality agreement;
- The external firm's investigator will compile information including the written complaint, the description of the facts and his or her conclusions as to whether or not the complaint is well founded;
- The investigator and the designated person under the policy may, as the case may be, make one or more recommendations as to the corrective measures to be imposed, if any;
- After the investigation, the Complainant and the Respondent will only be informed of the results and conclusions of the investigation that concern them, i.e. whether or not the complaint is well-founded;
- If an investigation report has been drawn up, the parties involved, the participants in the investigation and their representatives, if any, will not have access to the full investigation report, which remains confidential;
- If necessary, a follow-up could be carried out with the parties involved following the conclusion of the investigation.





# COMPLAINTS HANDLING PROCESS

## STEP 5

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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.

### **Reprisals and false allegations**

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 Resources Department will be informed of the outcome of the complaint and of the sanction(s) imposed, if applicable.



# Confidentiality

All information, reports and documentation relating to a complaint, as well as the identity of persons involved in the handling of a complaint, are treated confidentially by all parties concerned, unless such information is necessary for the handling of a complaint, the conduct of an investigation or the imposition of administrative or disciplinary measures.

In addition, the Company implements the following measures to protect the confidentiality of any documentation, complaint, information or report:

- Ensure that only those who need the complaint documentation to perform their duties have access to it;
- Implement adequate security measures to protect any documentation or information from unauthorized use;
- Remind employees involved in any stage of the complaint procedure of their confidentiality obligations;
- Have all persons involved and concerned in an investigation process under this policy sign a confidentiality undertaking.





# DOCUMENTATION RETENTION

All documentation related to the handling of a psychological harassment situation must be retained for a minimum of two (2) years following the conclusion of the complaint-handling process.

Once the minimum retention period has expired, the Company will destroy the documentation related to the complaint in accordance with its documentation framework and generally accepted secure destruction methods.





# SANCTIONS

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

## COMING INTO FORCE

This policy has been in effect since November 1, 2020, and was updated on July 31, 2024.







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