



Health & Safety Policy And Respect in the Workplace Policy

(web version)

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Central Erin Property Management Health & Safety Policy and Respect in The Workplace

Providing professional, real estate management to the Condominium, Commercial and Multi-Residential markets throughout Ontario.

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HEALTH AND SAFETY POLICY

The health and safety of all employees is of the utmost concern to Central Erin. It is our policy to provide safe and healthy working conditions, as well as proper first aid facilities. It is not only the Company's responsibility to ensure workplace health and safety but also the responsibility of all employees. This policy has been written to protect you, the employee, recognizing that we all have the right to finish our work and return home in the same safe condition we arrived.

It is in the best interest of all parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of this Company. The Company is committed to protecting employees from injury and illness by establishing safe work practices in compliance with occupational health and safety legislation.

The Company's Health and Safety Policy is built on the following guidelines:

- Accident prevention shall be an integral part of all job procedures;
- Employees must report all injuries, regardless of their extent, to their manager and to the person in charge of the first aid station immediately after the injury occurs;
- All accidents shall be investigated by the immediate manager and reported to Human Resources Manager;
- Management is responsible for development, installation, operation, administration and supervision of the safety program as outlined herein;
- A health and safety committee/representative shall be appointed where required;
- The Company will comply with the applicable provincial health and safety legislation; and
- Employees who fail to observe safety rules, to use safety equipment provided and to practice safety at all times will be subject to discipline up to and including termination of employment for cause.

The Company, working together with the health and safety committee/representative, should ensure the following is conducted:

- Accident investigations,
- Worksite inspections,
- Safety performance audits,
- Safety training, and
- Safe worksite design and layout.

Employees are encouraged to take the initiative, as individuals or departments, to improve existing programs and/or develop and recommend additional methods or programs. Equally important is management and employee commitment and involvement in the total health and safety efforts. Any accident or hazard that results in, or may result in injury to an employee or damage to equipment should be reported and thoroughly investigated. Regardless of how minor the injury or damage, the events that contributed to the injury should be recorded. Determination can then be made as to their cause and will serve to prevent their recurrence.

Safety inspections are essential in maintaining acceptable safety standards and work practices. Worksite conditions are constantly changing and inspections are a means of recognizing and appraising unsafe conditions of work practices resulting from these changes. You must report all work related accidents/ incidents immediately to your manager. You are responsible to obtain the proper forms from your Human Resources Manager and to complete them appropriately

GENERAL OFFICE SAFETY RULES

Most office accidents result from slips, trips and falls, lifting objects, punctures or cuts and being caught between things. Slips are caused by slippery floors, uncleaned spillage or grip less shoes. Trips occur over objects lying on the ground or jutting out into the aisles or because of poorly maintained floor surfaces. Falls can be from ladders or from standing on chairs to reach an object.

Many of these accidents can be avoided by simple planning and housekeeping:

- Traffic ways and aisles should be kept clear of materials, equipment and electric leads;
- Spilled liquids and anything else dropped on the floor should be immediately picked up or cleaned away;
- Freestanding fittings should be completely stable or secured to the wall or floor. Filing cabinets should be placed so that they do not open into aisles and should never be left with cabinet drawers open. For stability, load cabinets starting from bottom to top and do not open more than one drawer at a time;
- Office machines and equipment should be kept in good working order. Equipment using hand-fed processes, such as electric staplers and paper guillotines, should be guarded and staff trained in their proper use; and
- Many pieces of equipment using electricity can mean trailing cables, overloaded circuits, broken plugs and sockets. Employees should report such instances to their manager.

WORKING AT HEIGHTS

Fall hazards in the construction industry are ranked number one each year. The regulatory sections of the OSHA require an employer shall ensure that a worker who may use a fall protection system is adequately trained in its use and given adequate oral and written instructions by a competent person. A record of training is also required and it must be made available to a MOL inspector upon request. Further, that appropriate fall restraint or arrest equipment is provided, and that the employer shall develop a written procedure for rescuing the worker after his or her fall has been arrested.

To satisfy the above requirements, all Central Erin supervisors must provide the site specific instructions for the particular fall arrest system that will be used. This can be done in their JSA; this will act as the written part of the instructions.

There are many ways for protecting workers from falling hazards, for example, guard rails around all openings, using power elevating work platforms, properly built scaffolds or using travel restraint system.

The supervisor will have to determine what type of protection is the most suitable and appropriate to use or install.

Unprotected Openings & Edges

All openings must be guarded in order to prevent injury to workers, refer to the Construction Regulation, section 26.3 (2) & (3).

Openings must be guarded by means of guard rails consisting of a top rail, mid rail and toe board secured to prevent accidental dislodgement.

When an opening is less than 600 mm x 600 mm (2 ft. x 2 ft.), it may be covered with 19 mm (3/4") plywood securely fastened and marked in such a way that anyone would realize that there is a hole under the covering.

A worker must wear a safety harness with the energy absorbing lanyard tied off to a fixed support whenever the worker is exposed to the hazard of falling more than 3 metres (10 feet), into operating machinery, into water or other liquids or into or onto hazardous substances or objects (refer to the Construction Regulation, section 26).

A travel restraint system can be used if it is so designed that it prevents a worker from reaching the edge of an opening. If a worker can walk off the edge, then a fall arrest system must be used.

Guard Rails

Guard rails will be constructed in accordance with the Construction Regulations, section 26, 1 and 26.3. When guard rails are necessary they must be installed immediately.

All damaged or defective guard rails are to be fixed or replaced immediately.

If a guard rail must be removed for the purpose of a construction activity; the worker and his/her supervisor are responsible for that area and to ensure that no other worker or piece of equipment is exposed to a falling hazard. This can be achieved by wearing a fall arrest or travel restraint system and directing the movement of equipment. Once the job task has been completed the guard rail must be re- installed.

Travel Restraint System

A travel restraint system means an assembly of components intended to prevent a worker from reaching the edge of an opening and consists of the following:

- Full body harness;
- Lanyard, life line or cable;
- Rope grab or triple sliding hitch;
- Anchor point.

Fall Arrest System

A fall arrest system means an assembly of components intended to arrest the fall of a worker and consists of the following:

- Full body harness;
- Lanyard;
- Energy absorber;
- Rope grab or triple sliding hitch;
- Lifeline;
- Lifeline/lanyard's anchor points.

Note: A fall arrest system does not protect a worker from falling, it arrests the fall of the worker.

Note: A safety belt cannot be used in a fall arrest system.

Full Body Harness and Lanyards

All safety harnesses and energy absorbing lanyards must be CSA certified and carry CSA labels. Safety harnesses must be snug fitting and worn with all hardware and straps intact and properly fastened.

Energy absorbing lanyards must be 16 millimetre (5/8") diameter nylon or equivalent.

Lifelines

Vertical lifelines must be:

- 16 Millimetre (5/8") diameter polypropylene or equivalent;
- Used by only one worker at a time;
- Free from any danger or chafing;
- Free of cuts, abrasions and other defects;
- Long enough to reach the ground or knotted at the end to prevent the energy absorbing lanyard from running off the lifeline; and
- Secured to a solid object.

Horizontal lifelines must be:

- Designed by an Engineer;
- At least ½" diameter steel cable, if used by one worker;
- At least 5/8" diameter steel cable, if used by two worker;
- The eyes at the end must have a thimble or softeners;
- Use a minimum of three cable clips, for each eye splice.
- Be attached to an adequate support.

Rope Grabbing Devices

To attach the energy absorbing lanyard to a lifeline, use a mechanical rope grab that meets CSA Standard. Some mechanical rope grab devices may not be CSA certified. Supervisors are to ensure that a CSA certification stamp is on all rope grab devices.

When To Use Fall-Arrest System

REMINDER: FALLS ARE THE NUMBER ONE KILLER IN CONSTRUCTION AND YOU DON'T HAVE TO FALL FAR TO BE KILLED OR INJURED!

You must use a fall arrest system if you are in danger of falling:

- more than 3 metres (10 feet);
- into operating machinery;
- into water or another liquid; or
- into or onto a hazardous substance or object.

A fall arrest system consists of a full body harness and a lanyard with an energy absorber.

You can connect the lanyard:

- directly to an adequate support; or
- to a rope grab attached to a solidly anchored lifeline.

A fall arrest system must also be used when you are on:

- on a rolling scaffold that is being moved; or
- getting on, working from, or getting off of a suspended platform or scaffold, scissor lift, or a zoom boom.

Whether using a travel restraint or a fall arrest system, your lifeline must be adequately anchored. This means it must be able to support the weight of a small car. Falls create high energy loads. For example; a 150 lb. weight that falls 3 feet, will create a shock load of over 1 ton, if there is no energy absorber in the system.

Before using fall arrest equipment, check components carefully, your life may depend on it. Always check:

- your harness, make sure that straps, buckles, and other hardware is intact and undamaged, and
- that it is properly fitted;
- the lanyard should be securely fastened to the D-ring;
- inspect the lanyard for fraying, kinking and loose or damaged hardware;
- inspect energy absorbing lanyards regularly. Look for torn stitching on tearaway types. Check other types for damage such as cracks and loose parts;
- inspect fibre rope lifelines for fraying, burns, kinking, cuts and signs of wear and tear; and
- a life line is only to be used as a life line and nothing else.

Remember: Any equipment that has been involved in an actual fall must not be used again. Plus the accident scene must not be disturbed until the Safety Department gives permission to do so!

Ladders

All ladders shall be constructed and maintained in accordance with the Construction Regulations, sections 78 to 84. Some highlights from the regulation are as follows;

- All portable ladders must be equipped with non-slip bases;
- Straight ladders will be tied off or otherwise secured to prevent movement. If this is not possible, one worker will hold the base of the ladder while it is being used;
- When climbing up or down, workers must always face the ladder and maintain a three point contact (two feet and one hand or one foot and two hands);
- Ladders must not be erected on boxes, carts, tables, scaffold platforms, elevating work platforms or on vehicles;
- Straight ladders must be set up at an angle such that the horizontal distance between the top support and the base is not less than one-quarter and not more than one third the vertical distance between these points;
- Metal ladders or ladders with wire reinforcing must not be used in the proximity of energized electrical conductors;
- Wooden ladders must be unpainted;
- All ladders erected between levels must be securely fastened, extend 900 mm (3 ft.) above the top landing and afford clear access at top and bottom;
- Defective ladders must not be used and must be repaired or destroyed;
- Ladders must not be used horizontally or as substitutes for scaffold planks, runways or any other service for which they have not been designed;
- Workers on a ladder must not straddle the space between the ladder and another object; and
- Workers must not stand on the top or the pail shelf of a step ladder.

Elevating Work Platforms

In accordance with Section 144 of the current Regulations for Construction Projects an EWP shall be certified in writing by a professional engineer that it complies with The National Standards of Canada in Subsection 6.

In accordance with Section 147 of the current Regulations for Construction Projects, a worker who operates an elevating platform (EWP) must be given oral and written instruction on the operation of the elevating device. Therefore, an EWP shall only be operated by a worker who has been instructed in that particular class of EWP. Company X. supervisors, when ordering a rental EWP, should ensure the rental company provides the required training. Ask them for the training certificate and submit a copy to the Safety Department for proof of training for the following:

- operating the machine;
 - the daily inspections and maintenance required by the manufacturer;
 - the types of working surface on which the machine is designed to be used;
 - the maximum rated working load;
 - special conditions or limitations of the machine;
 - the significance of alarms;
 - the location of emergency controls.
- An EWP shall be inspected daily in accordance with the manufacturer's instructions. Company X. employees are to ensure that their EWP are inspected before use on each shift. Use the Accuworx EWP Inspection form. The Supervisor is to submit EWP Inspection forms to the Safety Department for record keeping.

BURNING / WELDING & CUTTING

The purpose of this section it to ensure that all Workers adhere to the practices outlined to prevent fires or explosions. Only trained and authorized Workers are permitted to conduct burning, welding, and cutting activities.

Standards-Burning, Welding and Cutting

Welding, cutting and similar processes must be carried out according to the requirement of: CSA Standard W1 17.2-94, Safety in Welding, Cutting and Allied processes, or other standard acceptable to the board.

The manufacturer's instructions and recommendations for the equipment being used, and Other applicable requirements of the Regulation.

Procedures – Burning, Welding and Cutting

No individual while attending to welding and burning shall use a plastic cased butane cigarette lighter.

All acetylene cylinders must have been placed in an upright position at least thirty minutes prior to use.

Workers must be protected from fumes, radiation and electric arcs during welding or burning operations with approved safety work clothing. Specifically, a Worker involved in welding or burning must wear:

- Flame resistant work clothing
- Gauntlet gloves of leather or other suitable material and arm protection.
- An apron of leather or other suitable material for heavy work,
- Eye and face protection against harmful radiation, particles of molten metal, and while chipping and grinding welds, and
- Substantial safety footwear made of leather or other suitable material.

All burning equipment must be kept clean and free of grease, oil or lubricants.

Receptacles for electrode stubs must be provided and used.

Arc welding must not be carried out unless Workers who may be exposed to radiation from the arc flash are protected by adequate screens, curtains or partitions or wear suitable eye protection.

A screen, curtain or partition near an arc welding operation must be made of or be treated with a flame resistant material or coating, and must have a non-reflective surface finish.

Recently welded or flam cut work must be marked "HOT" or effectively guarded to prevent contact by a worker, if a worker not directly involved in the hot work is likely to enter the work area.

Where burning or welding is taking place and vehicle or rail traffic moves into the area, a person must be posted to act as a guard for the welder.

All welding or burning in the vicinity of combustible materials must be done after the issuance of a burning permit and the requirement of the permit are met.

A competent worker will be defined to be, a person who has presented a certificate of training or has demonstrated proper knowledge to the Company of safe burning and welding practices.

Regulators, gauges, hoses or torches that are damaged are not to be used.

A suitable fire extinguisher must accompany all welding and burning equipment (nothing less than 5 lbs. ABC).

Where combustible materials are in the area, a tested water hose should also be available and combustible material wet down prior to and after burning and welding (as the situation warrants). Fire blankets are another acceptable means of control.

Prior to commencing burning or welding, the work area must be inspected for explosives, oil or any other combustible material, and such material removed or made safe before operations commence.

LOCKOUT OF EQUIPMENT AND MACHINERY

The purpose of this section is to ensure that employees do not work within the confines of a machine or equipment when there can be accidental start up or ignition while performing maintenance, such as cleaning, oiling or repairing.

Lockout of Equipment & Machinery

If the unexpected energization or startup of machinery or equipment or the unexpected release of an energy source could cause injury, the energy source must be isolated and effectively controlled.

Lockout is required if a work activity creates a risk of injury to Workers from the movement of machinery or equipment, or exposure to an energy source, and the machinery or equipment is not effectively safeguarded to protect the workers from the risk.

The application of a lock is not required if the energy isolating device is under the exclusive and immediate control of the Worker at all times while working on the machinery or equipment, or the device has a readily disconnected power supply (such as an electrical cord or quick release air or hydraulic line) and its connection point is kept under the immediate control of the worker at all times while work is being done.

Work on Energized Equipment

If it is not practicable to shut down machinery or equipment for maintenance, only the parts which are vital to the process may remain energized and the work must be performed by Workers who:

- a) Are qualified to do the work
- b) Have been authorized by the Company to do the work, and
- c) Have been provided with and follow written safe work procedures

General Guidelines

A Worker, prior to working on a piece of powered equipment must:

- Isolate the equipment according to established procedures.
- Install a personal lock and completed "Do Not Operate" tag on the locking device on the equipment, if so equipped.
- Try the controls before starting repairs to ensure the equipment can not be activated and any contained power be released.

CONFINED SPACE ENTRY

Workers are not allowed to enter a confined space as (determined by the Occupational Health and Safety Act and Regulations) without following the safe work procedures and practices provided by the Company. Only authorized and trained workers can enter and perform work in confined spaces.

Confined Space Entry

The person in charges as well as an employee required to enter a confined space shall place a safety lock-out mechanism on any devices that could permit entry or removal of material in the confined space. Any mechanical devices in the confined space will also be locked-out (when appropriate).

Prior to any person entering a confined space, the air quality in the container/area must be tested to ensure it is safe to work in. Auxiliary ventilation or breathing protection must be used where tests indicate contaminated air. Any person required to use breathing protection must be trained in the proper use of the equipment.

All requirements of the Confined Space Entry Permit shall be marked as checked or non-applicable (NA) and strictly complied with.

Where a mechanical retrieval system is used, the Supervisor will ensure that the monitor is trained in its use.

Prior to a confined space being returned to production, all tools and materials must be removed. All workers upon leaving the confined space must sign the release on the permit and return the permit to the Supervisor.

Prior to the resumption of use of the confined space, the Supervisor must inspect the area concerned following the completion of the work repairs.

RESPECT IN THE WORKPLACE

Central Erin recognizes the dignity and worth of every employee, and to that end believes in providing and maintaining a work environment in which all employees are free from workplace violence, harassment, and discrimination. This policy applies to all employees and covers all forms of violence, harassment and all forms of discrimination prohibited under human rights legislation.

DEFINITIONS

Workplace

Any place where business or work-related activities are conducted. It includes, but is not limited to, the physical work premises, work-related social functions (social events, golf games, etc.), and work assignments outside Central Erin's office, work related travel, and work-related conferences or training sessions.

Violence

- a) The exercise of physical force by a person against a worker, in the workplace, that causes or could cause physical injury to the worker;
- b) An attempt to exercise physical force against a worker, in the workplace, that could cause physical injury to the worker;
- c) A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in the workplace, that could cause physical injury to the worker.

Discrimination

The differential treatment of an individual on the basis of race, sex, colour, ancestry, place of origin, ethnic origin, same-sex partnership status, sexual orientation, gender identity, gender expression, age, disability, citizenship, family status or marital status, creed or any other factor that is legislatively protected within the province where the employee works (“Prohibited Grounds”).

Harassment

Engaging in a course of vexatious comments or conduct that is known, or ought to reasonably be known, to be unwelcome. It may include unwelcome, unwanted, offensive, or objectionable conduct that may have the effect of creating an intimidating, hostile or offensive work environment; interfering with an individual's work performance; adversely affecting an individual's employment relationship; and/or denying an individual's dignity and respect. Harassment may result from one incident or a series of incidents. It may be directed at specific individuals or groups.

Examples of harassment and discriminatory conduct include, but are not limited to:

- a) Humiliating an employee in front of co-workers;
- b) Subjecting an individual to unwelcome remarks or jokes;
- c) Consistent subjection of an individual to practical jokes or ridicule;
- d) The making of any work-related decision (including matters of hiring, promoting, compensating, work assignments, evaluations, training or job security) not on the basis of merit, but on the basis of any of the Prohibited Grounds;
- e) Comments which are intended, or that ought reasonably be known, to promote stereotyping on any of the Prohibited Grounds;
- f) Jokes or comments which draw attention, for example, to a person's disability, age, ethnic, racial, or religious background or affiliation or which draw attention to a person's gender or sexual orientation with the effect of undermining such person's role in a professional or business environment or that by their nature are known or ought reasonably be known to be embarrassing or offensive; and
- g) Derogatory remarks, verbal abuse or threats directed towards members of one gender or regarding one's sexual orientation or with respect to a person's or group's ethnic, racial or religious background or affiliation.

Harassment includes “**Sexual Harassment**” which includes any unsolicited conduct, comment, or physical contact of a sexual nature that is unwelcome by the recipient. It includes, but is not limited to, any unwelcome sexual advance (oral, written or physical); requests for sexual favours; unwelcome sexual or gender related comments, innuendos, remarks, jokes or taunts; unnecessary physical contact such as patting, touching, pinching or hitting; displays of sexually degrading, offensive or derogatory material such as graffiti or pictures; physical or sexual assault.

All employees have a right to be free from an unwelcome sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the employee and from a reprisal or a threat of reprisal for the rejection of such an unwanted sexual solicitation or advance.

Types of unwelcome conduct of a sexual nature which may constitute Sexual Harassment include but are not limited to:

- a) Propositions of physical intimacy;
- b) Bragging about sexual prowess;
- c) Leering or inappropriate staring;
- d) Sexually degrading words or displays of suggestive pictures;
- e) Inquiries or comments about a person's sex life or sexual behaviour; and
- f) Sexual jokes or stories causing embarrassment or offence, that are told or carried out after the person telling the story or joke has been advised that they are embarrassing or offensive or that by their very nature are known or ought reasonably be known to be embarrassing or offensive.

POLICY STATEMENT

All employees in the workplace have a right to work in an environment free from violence, harassment and discrimination. In order to accomplish the Company's goal of promoting a violence, harassment and discrimination free environment, the Company hereby establishes the following guidelines:

- a) The Company will not tolerate violent, harassing or discriminatory behaviour from employees, contractors, visitors, guests, or any others that attend at the workplace; and
- b) Every employee, contractor, or visitor conducting affairs at the Company's workplace shall be made aware of this policy, and the Company shall make every attempt to communicate its commitment to a violence, harassment and discrimination free workplace.

Retaliation or reprisals are prohibited against any individual who has complained under this policy, or has provided information regarding a complaint. Any retaliation or reprisals are subject to immediate corrective action, up to and including termination for cause. Alleged retaliation or reprisals are subject to the same complaint procedures and penalties as complaints of violence, discrimination and harassment.

Central Erin recognizes that individuals may find it difficult to come forward with a complaint under this policy because of concerns of confidentiality. Therefore, all complaints concerning workplace violence, harassment, or discrimination, as well as the names of parties involved, shall be treated as confidential to the furthest extent possible in law. Central Erin's obligation to conduct an investigation into the alleged complaint may require limited disclosure. As it pertains to violence, where the Company believes there to be imminent danger to an employee, it may divulge such confidential information as is reasonably necessary. No record of the complaint will be maintained on the personnel file of the complainant. At the conclusion of each complaint process, all related documentation will be maintained for safe-keeping in a confidential manner by the Human Resources Department in the related "Respect in The Workplace" file.

RESPONSIBILITIES

Each and every employee is responsible for creating and maintaining a violence, harassment and discrimination free workplace. All employees are requested to report promptly when they become aware of alleged actions or complaints of violence, discrimination or harassment. Managers are responsible for providing a workplace that is free from violence, harassment and discrimination. This responsibility includes actively promoting a positive work environment and intervening when problems occur.

COMPLAINT PROCEDURE

Step 1 - Self-Help

Employees are encouraged to attempt to resolve their concerns by direct communication with the person(s) engaging in the unwelcome conduct. Where employees feel comfortable in doing so, communicate disapproval in clear terms to the person(s) whose conduct or comments are offensive. Keep a written record of the date, time, details of the conduct, and witnesses, if any.

Step 2 - Management Support and Intervention

Employees who are not comfortable with step one (1) and who believe they are victims of violence, discrimination or harassment, or become aware of situations where such conduct may be occurring, are encouraged to seek advice from and report these matters to their manager or his/her designate.

Step 3 - Formal Complaint

If informal attempts at resolving the issue are not appropriate, or proving to be ineffective, a formal complaint may be filed. To file a formal complaint:

1. Provide a letter of complaint that contains a brief account of the offensive incident (i.e. when it occurred, the persons involved, names of witnesses, if any). The letter shall also include the remedy sought and be signed and dated by the person complaining;
2. File the complaint with your manager or a member of the senior management team or his/her designate; and
3. Cooperate with those responsible for investigating the complaint.

Formal complaints shall be investigated. The investigation process shall involve interviews of the complainant, the respondent and any witnesses named by either. Generally, within fifteen (15) business days of the incident or notice thereof, the individual charged with the investigation shall investigate the incident and may prepare a written report of the investigation findings. The report, if prepared, shall be provided along with recommendations, if any to your manager or a member of the senior management team or his/her designate for action.

Disciplinary action for violations of this policy will take into consideration the nature and impact of the violations, and may include a verbal or written reprimand, a suspension (paid or unpaid), or termination of employment for cause as determined by the Company. Similarly, deliberate false accusations are of equally serious nature and will also result in disciplinary action up to and including termination of employment for cause. Note, however, that an unproven allegation does not mean that the conduct did not occur or that there was a deliberate false allegation. It may simply mean that there was an insufficient evidential basis to proceed.

COMPLAINTS AGAINST THIRD PARTIES

Central Erin recognizes that an employee may be subject to violence, harassment or discrimination by clients / owners/ tenants or by others who conduct business with the Company. An employee who believes that he or she has been subjected to such conduct by a person who does not work for the Company may seek the advice of your manager or a member of the senior management team or his/her designate who will take whatever action is appropriate in the circumstances