

Policy:	Violence Free Workplace	Policy Reference and Revision Number:	HR 003 Rev 000
Department:	Human Resources	Effective Date:	08/01/2021
Authorized By:	SVP Human Resources	Page:	Page 1 of 2

Purpose

To ensure a safe workplace and to reduce the risk of violence for all employees.

Policy

BWC Terminals (the “**Company**”) will not tolerate any type of workplace violence committed by or against employees. Threats or acts of violence – including intimidation, bullying, physical or mental abuse and/or coercion – that involve or affect Company employees or that occur on the Company’s premises, will not be tolerated.

Workplace violence is any intentional conduct that is sufficiently severe, abusive, or intimidating to cause an individual to reasonably fear for their own personal safety or the safety of their family, friends and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several employees.

Examples of workplace violence include, but are not limited to:

- Threats or acts of violence occurring on Company premises, regardless of the relationship between the parties involved in the incident;
- Threats or acts of violence occurring off Company premises involving someone who is acting in the capacity of a representative of the Company;
- Threats or acts of violence occurring off Company premises involving an employee if the threats or acts affect the business interests of the Company;
- All threats or acts of violence occurring off Company premises, of which an employee is a victim, if the Company determines that the incident may lead to an incident of violence on Company premises; and
- Threats or acts of violence resulting in the conviction of an employee or agent of the Company, or an individual performing services for the Company on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence when that act or the conviction adversely affects the legitimate business interests of the Company.

Examples of conduct that may be considered threats or acts of violence under this policy include, but are not limited to:

- Threatening physical contact directed toward another individual;
- Threatening an individual or the individual’s family, friends, associates or property with harm;
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress;
- Intentionally damaging Company property or property of another;
- Menacing or threatening phone calls;

Policy:	Violence Free Workplace	Policy Reference and Revision Number:	HR 003 Rev 000
Department:	Human Resources	Effective Date:	08/01/2021
Authorized By:	SVP Human Resources	Page:	Page 2 of 2

- Stalking;
- Veiled threats of physical harm or similar intimidation;
- Communicating an endorsement of the inappropriate use of firearms or weapons; and/or
- Possession of a weapon while on Company property or while on Company business, except where permitted by applicable law.

The prohibition against threats and acts of violence applies to all persons involved in the operation of the Company, including, but not limited to, Company employees and other personnel, contract and temporary workers, consultants, contractors, customers, vendors, visitors, and anyone else on the Company's premises.

Procedure

If there is a threat of *immediate danger* employees are encouraged to contact 911.

All threats of or actual violence or dangerous situations should be reported as soon as possible to the immediate supervisor, any other member of management, and Human Resources. Employees should be as specific and detailed as possible when reporting these situations.

Any *suspicious individuals or activities* should also be reported as soon as possible to a supervisor, other management, safety, or security personnel. Employees should not take any actions that may place themselves in danger. If you see or hear a commotion or disturbance, do not try to intercede, or see what is happening, but report it immediately.

The Company will promptly and thoroughly investigate all reports of threats of or actual violence and of suspicious individuals or activities. The identity of the Company individual making a report will be protected to the extent practical.

To maintain workplace safety and the integrity of its investigation, anyone determined to be responsible for threats of or actual violence or other conduct that is in violation of this policy will be subject to prompt disciplinary action up to and including immediate termination of employment. Nonemployees engaged in violent acts on the employer's premises will be reported to the proper authorities.

No provision of this policy statement or any other provision in this policy alters the at-will nature of employment with Company. The Company will make the sole determination of whether and to what extent, threats or acts of violence will be acted upon by the Company. In making this determination, the Company may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that workplace violence has occurred.