Workplace Harassment Policy

Pillar is committed to a respectful workplace free from all forms of harassment and discrimination.

This policy applies to all Pillar employees, interns, volunteers, contractors, and job applicants. It covers harassment from any source including co-workers, supervisors, Directors of the Board, members, tenants, partners, and members of the public.

It applies on Pillar's premises, at off-site work functions and work-related travel and social events, while working remotely, and in all work-related communications, including virtual meetings, email, text messages, phone and video calls, and social media. It also applies to conduct outside work hours or on personal channels where that conduct has a connection to the workplace or affects working relationships.

DEFINITIONS

Workplace harassment is a pattern of offensive or inappropriate comments or behaviour directed at an employee that the person responsible knows, or should reasonably know, is unwelcome. It includes workplace sexual harassment and may occur in person or through the use of information and communications technology, between individuals at any level of the organization. Reasonable management decisions, such as assigning work, providing feedback on performance or taking disciplinary action, are not workplace harassment.

Workplace sexual harassment is a pattern of unwelcome comments or behaviour towards an employee's sex, sexual orientation, gender identity or gender expression that the person responsibly knows, or should reasonably know, is unwelcome. It also includes an unwelcome sexual request or advance by someone with the authority to grant or deny a workplace benefit or advancement, where that person knows, or should reasonably know, it is unwelcome. A single request or advance may constitute sexual harassment.

Pillar also prohibits harassment based on the grounds protected under the Ontario Human Rights Code, including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status and disability.

Reprisal means penalizing, threatening or otherwise treating someone adversely for honestly reporting a concern, rejecting sexual advances, seeking assistance, participating in an investigation or exercising a legal right. A complaint made in good faith is protected even if it is not proven.

EXAMPLES OF PROHIBITED CONDUCT

Examples of the type of conduct Pillar prohibits include, but are not limited to:

- Slurs, negative stereotyping, or demeaning comments.
- Derogatory or offensive jokes.
- Written or graphic material displayed or circulated in the workplace that denigrates or shows hostility toward an individual or group.

Examples of sexual harassment include:

- Vulgar or sexual comments, jokes, stories, and innuendo.
- Sexual or suggestive comments about someone's body or clothing.
- Gossip or unwelcome questions about someone's sexual conduct or orientation.
- Vulgarity, inappropriate touching, and obscene or suggestive gestures.
- Displaying or circulating sexually suggestive photographs, cartoons, graffiti or similar material in the workplace.
- Unwelcome flirting, requests for dates, or inappropriate staring.
- Pressuring someone to engage in sexual activity or accept a date, including by offering rewards or preferential treatment or threatening employment consequences.
- Unwelcome sexual requests or advances by someone in a position to grant or deny a workplace benefit or advancement.
- Demeaning or offensive remarks that are directed at a person because of their sex or gender identity, whether or not the remarks themselves are sexual in nature.
- Retaliation against an employee for refusing sexual or social advances, complaining about sexual harassment, or cooperating with the investigation of a complaint.

SUBMITTING A REPORT

Anyone who experiences or witnesses possible harassment is encouraged to report it promptly to one of the contacts below, verbally or in writing. There is no requirement to confront the person involved or try to resolve the matter informally first.

Where a worker indicates they have a concern but does not provide details, Pillar will follow up and ask that details be provided within 10 business days, or another reasonable timeframe agreed with the worker. If details are not provided, Pillar may proceed based on the information available or, where there is not enough information to proceed, close the matter. A closed matter may be reopened if further information is provided.

Delay in reporting does not automatically prevent Pillar from addressing a concern.

Reporting contact	Report involves	Contact details
Chief Executive Officer	Pillar employees, interns, volunteers, independent contractors, Pillar members and members of the public	ceo@pillarnonprofit.ca

Reporting contact	Report involves	Contact details
Board Chair	CEO and Directors of the Board	chair@pillarnonprofit.ca
Board Vice Chair	The Board Chair	vicechair@pillarnonprofit.ca

Employees may contact an alternate directly, without notifying or obtaining permission from anyone implicated. Pillar will keep these details current and make sure no one named in the report can access or control the relevant reporting channel.

Employees are encouraged to include 'CONFIDENTIAL' in the subject line of reporting emails. Employees wishing to arrange an in-person meeting or telephone call may provide their contact details and availability by email. Reports may also be made verbally without prior email correspondence.

If the report involves more than one of the contacts above, it may be made to whichever named contact is not involved. Employees may also contact the Ministry of Labour, Immigration, Training and Skills Development Health and Safety Contact Centre (1-877-202-0008) or the Human Rights Legal Support Centre (hrlsc.on.ca).

Where possible, a report should include:

- The reporting person's name and contact information.
- The alleged harasser's name and position, if known.
- Names and contact information of witnesses or others with relevant information, if known.
- Details of what happened, including dates, frequency, and locations.
- Relevant documents, messages or other evidence.
- Any immediate safety concerns or accommodation needs.

Missing information will not prevent Pillar from receiving or assessing a report. Anonymous reports will be assessed as far as reasonably possible, although limited information may affect Pillar's ability to investigate.

Employees may access confidential counselling through the Employee Assistance Program (1-877-207-8833) available under Pillar's group benefits plan. Any worker may also seek assistance from the Human Rights Legal Support Centre (hrlsc.on.ca).

PROCESS AND INVESTIGATION

Pillar will investigate and address all complaints and incidents of workplace harassment in a fair and timely manner, with an investigation appropriate to the circumstances, even if no formal complaint is made or a complaint is withdrawn. Where Pillar becomes aware of information suggesting harassment may have occurred, it may look into the matter whether or not a formal complaint has been made.

The person handling the matter must have appropriate knowledge and skills to do so, act impartially and not be under the direct control of the person accused. No one named in a report will control or direct the investigation, determine its findings or decide corrective action about their own conduct. Pillar will bring in an external investigator where necessary.

- Upon receiving a report or becoming aware of possible harassment, the person handling the matter will acknowledge the complaint, clarify the concerns, assess immediate safety and accommodation needs, and explain confidentiality requirements and next steps. Temporary protective measures may be put in place to protect those involved, without prejudging the outcome.

- The person handling the matter will thoroughly interview the person who reported, the alleged harasser and relevant witnesses separately, and review relevant documents and communications. The alleged harasser will receive sufficient details of the allegations and an opportunity to respond. Both parties will have a chance to respond to significant conflicting information where fairness requires.
- Appropriate notes will be kept, and a written report will summarize the allegations, steps taken, evidence and findings, including whether harassment more likely than not occurred. Investigations will generally be completed within 90 calendar days. If more time is reasonably needed, the parties will be told about the delay and the expected next steps.

- **Results in writing.** Within 10 calendar days after the investigation is complete, the person handling the matter will inform the employee who allegedly experienced harassment, and the alleged harasser if they are a Pillar employee, in writing of the results of the investigation and any corrective action that has been or will be taken. Each person will be notified separately and confidentially, by secure email or sealed letter. The notice will not necessarily include the full investigation report or confidential information about others.

Informal resolution must be voluntary and will not replace a required investigation.

SUPPORT FOR AFFECTED WORKERS

Pillar will take reasonable steps to support and protect any worker who reports harassment or is affected by it, from the time a concern is raised through to its resolution.

While a concern is being addressed, Pillar may put interim measures in place, such as adjusting schedules, work locations, or reporting relationships, or limiting contact between the people involved. These measures will not disadvantage the person who raised the concern.

Once the process is complete, Pillar will follow up with the affected worker to discuss any ongoing support or adjustments they may need. This applies whether or not the concern is substantiated.

Employees may access confidential counselling through the Employee Assistance Program (1-877-207-8833) available under Pillar's group benefits plan. Any worker may also seek assistance from the Human Rights Legal Support Centre (hrlsc.on.ca).

CORRECTIVE ACTION

Where workplace harassment is found to have occurred, Pillar will take appropriate corrective action based on the nature and severity of the behaviour and the circumstances.

For employees, this may include education, training, counselling, a written warning, suspension, or termination of employment. For other individuals associated with the workplace, consequences may include restrictions on their involvement with Pillar.

Where harassment involves Pillar members, tenants, partners, or members of the public, Pillar may change how services are provided, restrict or end contact, refuse service, bar an individual from Pillar's premises, or take action under the applicable lease, membership, or partnership terms.

Pillar may also take broader measures, such as workplace-wide training or changes to policies and procedures, to prevent harassment from recurring.

CONFIDENTIALITY AND RECORDS

Information about incidents, complaints and investigations, including identifying information, should not be disclosed to co-workers and other witnesses unless disclosure is necessary to investigate, take corrective action, comply with the law or obtain advice about one's rights.

Pillar will securely retain reports, evidence, investigation records, written outcomes and corrective-action records, with access restricted to authorized individuals. Records will be retained for at least one year after the investigation concludes and longer where required by the retention schedule or applicable law.

PROTECTION FROM REPRISALS

Pillar prohibits reprisals or threats against anyone for honestly reporting a concern, rejecting sexual advances, participating in an investigation or exercising legal rights.

A complaint that is not substantiated is not, on its own, evidence of dishonesty. Deliberately false allegations or evidence may lead to corrective action following a fair assessment.

POLICY REVIEW

This policy will be reviewed at least annually and revised as necessary.

Approved by:	Maureen Cassidy, Chief Executive Officer
Signature:	
Date:	November 4, 2026