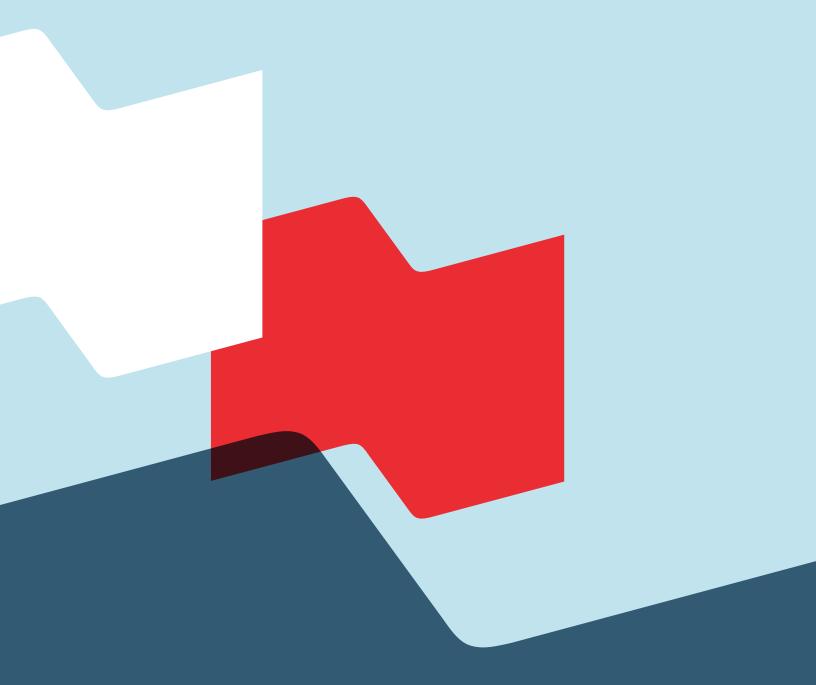


Policy on the Prevention of Workplace Discrimination



Policy on the Prevention of Workplace Discrimination

The Bank places great importance on inclusion and employee diversity and takes the necessary means to foster an open and respectful workplace free from discrimination.

As such:

The Bank periodically raises awareness and trains its employees and managers with regard to preventing workplace discrimination.

The Bank has adopted a **zero-tolerance** policy with regard to preventing workplace discrimination, applicable at all times and revised annually, which sets out:

- > The Bank's commitments to preventing workplace discrimination.
- The scope of application: applicable to all employees, including officers and members of management—regardless of employee status or position—as well as consultants, suppliers and members of the Board of Directors. Furthermore, the Policy applies to all work environments, to any professional or work-related event off Bank premises, including remote work, and to any other situation that has an impact on the work environment or on professional relations between colleagues.
- A definition of workplace discrimination that includes any actions, words, practices, processes or policies that negatively affect a person or group or deprive them of a benefit based on one or more prohibited grounds of discrimination under the Canadian Human Rights Act.
- A list of prohibited grounds of discrimination: race, national or ethnic origin, colour, religion, age, sex (including pregnancy), sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, conviction of an offence for which a pardon has been granted or disability (physical or mental).
- > The distinction between direct and indirect discrimination:
 - Direct discrimination: actions, words, decisions, practices, directives or policies that directly target one or more individuals.
 - Indirect discrimination: actions, words, decisions, practices, directives or policies that appear to be impartial, fair and equitable but that disadvantage one or more individuals.
- A clear and simple process for reporting when an individual is a witness to or claims to be a victim of workplace discrimination.
- > A rigorous process for handling workplace discrimination complaints, including an investigation process.
- A skilled team of advisors who are trained on the subject and can quickly intervene in any situation brought to their attention.
- A prohibition on threatening or retaliating against anyone who has reported an incident, filed a complaint or provided information regarding a situation of workplace discrimination.
- > The fact that corrective or disciplinary measures up to and including dismissal may apply, particularly in the event

of workplace discrimination or any retaliation.

- > The Bank's commitment to confidentiality throughout the process.
- The external, confidential medical and psychological support available (24/7) to people experiencing a situation that may involve discrimination at work.
- > The internal resources available to all persons involved.
- > The internal and external recourses available to persons alleging workplace discrimination.

The Bank has created a framework to ensure ongoing sound governance of practices intended to prevent workplace discrimination.