



**Zertic Human Rights  
&  
Labor practices**



# Zertic Human Rights & Labor Practices

---

*Zertic is recognizing ISO 26000 as a reference document that provides guidance. We're in the transition to follow the guidance provided by ISO 26000. This pre-ISO26000 document is directed on 2 of the 7 core subjects: Human Rights and Labor Practices.*

---

## PURPOSE

Zertic is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities.

**The purpose of this policy is:**

- To identify the types of behavior prohibited by this policy
- To provide procedures to follow when complaints of discrimination or harassment made by partners or employees of Zertic arise

- To ensure that all partners and employees of Zertic are aware that harassment and discrimination are unacceptable practices incompatible with our company standards, and a violation of the law

## SCOPE

### This policy:

- Applies at every level of Zertic, and extends to all partners, employees (including full-time, part-time, temporary, probationary, casual and contract staff) and students
- Applies to every aspect of the employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline, and performance appraisals
- Applies to the physical offices of Zertic
- Extends outside of the offices of Zertic (such as off-site client meetings, business travel, firm-sanctioned social events and to electronic communications)

## PROHIBITED CONDUCT

Zertic upholds and supports the right to equal treatment without discrimination or harassment. Discrimination and harassment are prohibited by European Convention on Human Rights (ECHR) (“the *Convention*”). This Policy prohibits discrimination or harassment based on the following grounds, and any combination of these grounds:

- Age
- Creed (includes religion)
- Sex (including pregnancy and breastfeeding)
- Gender Identity and Gender Expression
- Sexual Orientation
- Family status (such as a parent-child relationship)

- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental, or learning disabilities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Color
- Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received) (applies to employment only)
- Association or relationship with a person identified by one of the above grounds
- Perception that one of the above grounds applies.

**Anyone at Zertic found to have engaged in conduct constituting *Convention*-based discrimination and/or harassment may be subject to disciplinary action, up to and including termination.**

## DEFINITIONS

Discrimination and harassment are defined as:

***Discrimination:***

Refers to any form of unequal treatment based on a *Code* ground, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve

direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral but have the effect of disadvantaging certain groups of people. Discrimination may take obvious forms, or it may occur in very subtle ways. In any case, even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this policy.

***Harassment:***

By means of, **engaging in a course of vexatious comment or conduct that is known, or ought reasonably to be known, to be unwelcome.** It can involve words or actions that are known or should be known to be offensive, embarrassing, humiliating, demeaning, or unwelcome.

One incident could be interpreted by an individual as having an impact that is substantial enough to create a “poisoned environment”. A key element of harassment is the way in which an individual “perceives” the harassing incident.

Therefore, even if the comment or conduct was not intended to be harassment, it may be considered harassment if it has had the effect of unreasonably interfering with the employee’s work performance or creating an intimidating, humiliating, hostile or offensive environment.

**A few common examples of harassment may include, but are not limited to:**

- Making remarks, jokes or innuendos related to a person’s race, disability, creed, age, or any other ground.
- Posting or circulating offensive pictures, graffiti, or materials, whether in print or via e-mail or other electronic means.
- Singling out a person for humiliating or demeaning “teasing” or jokes because they are a member of a group protected under the *Human Rights Code*.
- Ridiculing a person because of characteristics that are related to a ground of discrimination. For example, this could include comments about a person’s dress, speech or other practices that may be related to their race, disability, or creed.

---

## REPORTING WORKPLACE HARASSMENT

This section outlines reporting workplace harassment for *Human Rights Convention-Based Discrimination and/or Harassment*.

**Zertic encourages the reporting of all incidents of harassment and discrimination, regardless of who the alleged offender(s) might be.**

All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment in any form, for making a formal complaint or cooperating in an investigation.

### 1. How to Report Workplace Harassment:

Partners or employees can report incidents or complaints of *Code*-based discrimination and/or harassment verbally or in writing.

The report of the allegation(s) should include the following information:

**a)** Name(s) of the person who has allegedly experienced *Code*-based discrimination and/or harassment and contact information

**b)** Name of (any) alleged harasser(s), position and contact information (if known)

**c)** Names of the witness(es) (if any) or another person(s) with relevant information to provide and contact information (if known)

**d)** Details of what happened including date(s), frequency, and location(s) of the alleged incident(s) a. Any supporting documents the person who complains of *Convention*-based discrimination and/or harassment may have in his/her possession that are relevant to the complaint.

**e)** List any documents a witness or another person may have in their possession that are relevant to the complaint.

## 2. Who to Report Workplace Harassment To:

An incident or a complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

Complainants are encouraged to report any incidents or complaints of *Code*-based discrimination and/or harassment to his or her manager. If the **direct manager** is the

person engaging in the discrimination/harassment, contact another management team member.

The **direct manager** shall be notified of the workplace harassment incident or complaint so that they can ensure an investigation is conducted that is appropriate in the circumstances.

The **direct manager** will be responsible for investigating the specific complaint promptly.

# INVESTIGATING COMPLAINTS

## 1. Commitment to Investigate

Zertic will ensure that an investigation appropriate in the circumstances is conducted when any manager or supervisor receives a complaint of workplace harassment. Complaints or incidents of workplace harassment will be investigated in a fair, respectful, and timely manner.

## 2. Who Will Investigate

The **CEO and COO** will determine who will conduct the investigation into the incident or complaint of workplace harassment. Depending on the allegations and the people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

### **3. Timing of the investigation**

The investigation must be completed in a timely manner, generally within 90 days or less, unless there are extenuating circumstances (i.e., illness, complex investigation) warranting a longer investigation.

### **4. Results of the Investigation**

After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by Zertic.

### **5. Confidentialiy**

Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.

*This Statement applies to Zertic B.V. and its affiliates Dynasec Netherlands B.V., EZ2XS B.V. and Zertrace B.V.*

Frank Hoeben CEO

A handwritten signature in blue ink, appearing to read 'F. Hoeben', with a large, sweeping flourish extending to the right.

Erwin Leijten COO

A handwritten signature in blue ink, appearing to read 'Erwin Leijten', with a long, sweeping flourish extending to the right.



**Let's  
empower  
trust.**