

POLICY AGAINST WORKPLACE HARASSMENT

Policy Statement

It is the policy of this Production (the “**Company**”) that all workers have a right to work in an environment free of harassment, including discriminatory harassment and sexual harassment. All individuals are required to conduct themselves in a professional manner on Company premises or while performing work for the Company and to refrain from engaging in harassing behavior. The Company’s Policy Against Workplace Harassment applies to all persons involved in the operations of the Company. In keeping with this commitment, the Company prohibits and will not tolerate harassment by any individual, including employees, supervisors and managers, as well as vendors, independent contractors, clients, and any other persons associated with the operations of the Company. Harassment, in any of these forms may be unlawful, violates Company policy, and violates both the spirit of equal opportunity and the rights of the individual.

Even if an employee’s conduct does not violate applicable law prohibiting harassment, such conduct may be found to violate the Company’s Policy Against Workplace Harassment.

Any employee who is found to have acted in violation of this policy will be subject to appropriate disciplinary action. The services and professional relationships of any non-employees associated with Company operations who violate this Policy may also be terminated.

Definitions

“**Harassment**” means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome. The person experiencing the harassment may have informed the harasser that the behaviour is unwelcome or the behaviour may be deemed unwelcome if a reasonable person in the circumstances would view it that way. However, harassment excludes any reasonable action taken by an employer or supervisor relating to the management and direction of employees or the place of employment. Harassment includes discriminatory harassment and sexual harassment.

Harassment includes, but is not limited to, such things as:

- words, gestures, actions or practical jokes, the natural consequence of which is to humiliate, ridicule, insult or degrade;
- threats or intimidation;
- harmful hazing or initiation practices;
- vandalizing personal belongings;
- physical assault; or
- persistent rudeness, bullying, taunting, patronizing behaviour, yelling, spreading malicious rumours, or other conduct which adversely affects working conditions or work performance.

“**Discriminatory harassment**” means harassment that is based on a person’s race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy, childbirth, and related medical conditions), sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability, or any other grounds protected by applicable law. Discriminatory harassment includes, but is not limited to, such things as:

- slurs, negative stereotyping, threats, derogatory jokes or hostile acts which relate to protected grounds of discrimination, or
- the circulation or the display in the workplace of objects or pictures that defame or show hostility or dislike toward an individual because of protected grounds of discrimination.

Discriminatory harassment includes sexual harassment, as defined below.

“Sexual harassment” means:

- engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Sexual harassment includes, but is not limited to, such things as:

- unwanted touching;
- unwelcome sexual flirtations, advances or propositions;
- sexually suggestive, obscene or degrading comments or gestures;
- offensive jokes of a sexual or gender-related nature;
- leering or staring;
- displaying or circulating pictures or other material of a sexual nature;
- unwelcome questions or remarks about a person’s sex life, appearance, clothing;
- offering employment benefits, such as favorable assignments, reviews, promotions or the like, in exchange for sexual favors; or
- making or threatening reprisals after a negative response to sexual advances.

Application of Policy

This policy applies to all employees, including supervisors and managers, and anyone else conducting any form of business on behalf of the Company in the Province of Ontario.

Reporting Harassment

If you believe you are the victim of, or have observed, harassment, you are encouraged to tell the individual that his/her behavior is unwelcome and ask him/her to stop. Individuals so told should comply immediately and graciously with such requests. If it is difficult or inappropriate to approach the person responsible, or if they do not stop the behavior, then employees should report the incident(s) as set out in this policy.

Reports of alleged or suspected harassment may be made verbally or in writing. Provide as much information as possible, including an account of the incident(s), where and when they occurred, the people involved and the names of any witnesses. Provide any additional information or evidence that might be relevant to the complaint.

Reports should be made to your supervisor, any supervisory employee with whom you feel comfortable communicating, or to any of the following individuals:

Name

Telephone Number

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Reports should be made as soon as soon as possible after the incident.

Non-employees involved in Company operations, such as vendors, independent contractors, clients, or any others associated with operations may report experiencing or witnessing conduct that might violate this policy to Craig Forrest, Line Producer, or Willie Halley, Senior People & Culture Business Partner, AMC Networks.

The individual that receives the complaint or report is required to promptly notify Craig Forrest, Line Producer, or Willie Halley, Senior People & Culture Business Partner, AMC Networks so that an investigation into the complaint can be commenced. If anyone in a leadership role fails to report any incidents or fails to take appropriate corrective actions, he or she will be subject to disciplinary action, up to and including termination.

All complaints or reports will be taken seriously and will be dealt with fairly and promptly.

Investigation Procedure

The Company will investigate complaints or reports of harassment. The investigation will be approached in an unbiased manner.

As part of the investigation, the Company's designated investigator will interview the complainant, the respondent, and any other witnesses the investigator believes may have information relevant to the complaint or report. The Company expects that anyone engaged by the investigator will fully and truthfully cooperate with the investigation process. The investigator will review any documents the investigator considers relevant. The respondent will be given the details of the complaint and will be provided with a reasonable opportunity to respond.

All complaints will be taken seriously and all investigations are completed in a prompt and diligent way, focused on finding facts and evidence and ensuring fairness throughout the process.

All investigations will be documented and all such documents will be stored in a manner that maintains their confidentiality to the extent possible.

Upon completion of the investigation, the Company will inform the person making the complaint and the person accused of the results of the investigation. If a complaint or report is found to have merit, then appropriate remedial or disciplinary action will be taken. This action may include education, training or formal disciplinary action up to and including dismissal of the offending person(s).

Confidentiality

Complaints and reports of harassment involve sensitive matters. The Company will make every effort to keep confidential any information pertaining to the complaint, report or the associated investigation to the extent possible, subject to disclosure as appropriate or necessary to conduct a thorough investigation, take disciplinary action or as may be required by law.

All employees involved in a harassment complaint or report must maintain the confidentiality of any information they receive during the course of the investigation process so those who may have experienced or observed harassment will feel free to come forward, and the reputations and interests of those accused are protected. Any employee breaching confidentiality may be subject to disciplinary action, up to and including dismissal.

Retaliation Prohibited

The Company encourages workers who have job-related concerns or complaints to talk them over with the Company. To further encourage workers to bring job-related concerns or complaints to the Company's attention, and to protect workers who do so, the Company prohibits retaliation against any employee (i) for good-faith reporting of job-related concerns or complaints including, but not limited to, harassment, discrimination, and compensation issues; and (ii) for cooperating in any investigation regarding job-related concerns or complaints.

The Company further prohibits retaliation against any employee who, in connection with any proceeding by or before any regulatory authority, administrative agency, government enforcement agency, court, arbitration or other governmental forum or body, lawfully does any of the following: participates or assists in any investigation or hearing, provides testimony or files a complaint or claim. Any worker, including any supervisor or manager, who retaliates against any worker in violation of this policy, may be subject to immediate disciplinary action, including termination of employment.

Frivolous Complaints

Complaints or reports of harassment are serious matters. Employees who are found to have made frivolous, vexatious, or malicious complaints of harassment may be subject to disciplinary action, up to and including dismissal.

Annual Review

The Company's workplace Policy Against Workplace Harassment will be reviewed upon hire and annually thereafter.

Further Information

Nothing in this policy prevents or discourages a worker from exercising any other rights, actions or remedies that may be available under applicable legislation, including the Ontario *Human Rights Act*, *Occupational Health and Safety Act*, or the *Employment Standards Act, 2000*. A worker has the right to file a complaint with the Ministry of Labour, Immigration, Training and Skills Development or with the Human Rights Tribunal of Ontario, or to exercise any other legal avenues that may be available.

Please sign below to acknowledge that you have received a copy of this policy. You are strongly encouraged to retain a copy of this policy for your records.

Date

Signature