



Human Rights Policy

Document: PO-HR-15
Revision no. 09
Revision Date: 20250917

Privacy: GENERAL

1.0 Overview

Common Collection Agency Inc. (CCA) 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.

Under the Ontario *Human Rights Code*, every person has the right to be free from harassment (*R.S.O. 1990, c. H.19, s. 5(2); 1999, c.6, s.28(6);2001, c.32,s.27(1); 2005, c.5,s.32(6)*) and discrimination (*R.S.O. 1990, c. H.19, s. 5(2); 1999, c.6, s.28(6);2001, c.32,s.27(1); 2005, c.5,s.32(6)*). Harassment and discrimination will not be tolerated, condoned or ignored at Common Collection Agency Inc. If a claim of harassment or discrimination is proven, disciplinary measures will be applied, up to and including termination of employment.

Common Collection Agency Inc. is committed to a comprehensive strategy to address harassment and discrimination, including:

- providing training and education to make sure everyone knows their rights and responsibilities
- regularly monitoring organizational systems for barriers relating to *Code* grounds
- providing an effective and fair complaints procedure
- promoting appropriate standards of conduct always. **See FR-HR-04 Employee Code of Ethics and Behaviour**

2.0 Policy Objective

The objectives of this Policy are to:

- Make sure that members, clients and associates of Common Collection Agency Inc. are aware that harassment and discrimination are unacceptable practices and are incompatible with the standards of this organization, as well as being a violation of the law (*e.g. violation of the Ontario Human Rights Code Amendments – Bill 137*).
- Set out the types of behaviour that may be considered offensive and are prohibited by this policy.

3.0 Scope

The right to freedom from discrimination and harassment extends to all employees, including full-time, part-time, temporary, probationary, casual and contract staff.

It is also unacceptable for members of Common Collection Agency Inc. to engage in harassment or discrimination when dealing with clients, or with others they have professional dealings with, such as suppliers or service providers.

This policy:

- Applies at every level of CCA, and extends to all partners, employees (including full time, part-time, temporary, casual and contract staff)
- Applies to every aspect of the workplace environment and employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline, performance appraisals and termination.
- Covers rates of pay, overtime, hours of work, public holidays, vacation time, shift work, corporate training, corrective action, and corporate discipline



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- Applies to events that occur outside of the physical workplace (such as off-site client meetings, business trips, company parties and to electronic communications)

4.0 Protected Grounds

This policy prohibits discrimination or harassment based on the following grounds, and any combination of these grounds:

- Age
- Creed (religion)
- Sex (including pregnancy and breastfeeding)
- Sexual orientation
- Gender identity
- Gender expression
- Family status (such as being in a parent-child relationship)
- Marital status (including 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
- Colour
- Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received)
- Association or relationship with a person identified by one of the above grounds
- Perception that one of the above grounds applies.

5.0 Key Concepts

The following behaviour is prohibited:

Discrimination: means 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 disadvantage certain groups of people. Discrimination may take obvious forms, or it may happen in very subtle ways. Even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this policy.

Section 23(2) prohibits CCA from asking questions that directly or indirectly classify or indicate qualifications by a prohibited ground of discrimination. CCA fundamental consideration for recruitment, retention and advancement of staff is individual achievement and merit. **See PO-HR-11 Employment Equity**

Harassment: means a course of comments or actions that are 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, based on a ground of discrimination identified by this policy. Harassment can occur based on any of the grounds of discrimination.

Common Collection Agency Inc. (CCA) will not tolerate Workplace Harassment and Workplace Violence from any person in the workplace at CCA.



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See PO-HR-08 Workplace Harassment Policy and PO-HR-10 Workplace Violence

Examples of harassment include:

- Epithets, remarks, jokes or innuendos related to a person's race, gender identity, gender expression, sex, disability, sexual orientation, creed, age, or any other ground
- Posting or circulating offensive pictures, graffiti or materials, whether in print form 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 *Code*-protected group
- Comments 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 sex, race, gender identity or creed.

If a person does not explicitly object to harassing behaviour, or appears to be going along with it, this does not mean that the behaviour is okay. The behaviour could still be considered harassment under the *Code*.

Sexual and gender-based harassment: sexual harassment is a form of harassment that can include:

- Gender-related comments about a person's physical characteristics or mannerisms
- Paternalism based on gender which a person feels undermines his or herself respect or position of responsibility
- Unwelcome physical contact
- Suggestive or offensive remarks or innuendoes about members of a specific gender
- Propositions of physical intimacy
- Gender-related verbal abuse, threats or taunting
- Leering or inappropriate staring
- Bragging about sexual prowess or questions or discussions about sexual activities
- Offensive jokes or comments of a sexual nature about an employee or client
- Rough and vulgar humour or language related to gender
- Display of sexually offensive pictures, graffiti or other materials including through electronic means
- Demands for dates or sexual favours.

Sexual Solicitation: this policy prohibits sexual solicitations or advances by any person who is in a position to grant or deny a benefit to the recipient of the solicitation or advance. This includes managers and supervisors, as well as co-workers where one person is in a position to grant or deny a benefit to the other. Reprisals for rejecting such advances or solicitations are also not allowed.

Poisoned environment: a poisoned environment is created by comments or conduct (including comments or conduct that are condoned or allowed to continue when brought to the attention of management) that create a discriminatory work environment. The comments or conduct need not be directed at a specific person, and may be from any person, regardless of position or status. A single comment or action, if sufficiently serious, may create a poisoned environment.

6.0 Roles and responsibilities

All persons present at Common Collection Agency Inc. are expected to uphold and abide by this policy, by refraining from any form of harassment or discrimination, and by cooperating fully in any investigation of a harassment or discrimination complaint.



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Managers and supervisors have the additional responsibility to act immediately on observations or allegations of harassment or discrimination. Managers and supervisors are responsible for creating and maintaining a harassment- and discrimination-free organization and should address potential problems before they become serious.

Common Collection Agency Inc. has appointed Jeff Kerslake (Ext 240; jkerslake@commoncollections.com), who will provide information about human rights and this policy and procedure to any person who is concerned about possible harassment or discrimination within the organization. Jeff Kerslake will not act as an advocate for any person and will not provide legal advice, and will maintain the confidentiality of communications with him, unless required to disclose information under a legal obligation.

The provisions of this policy and procedure in no way affect the right of any person to exercise his or her rights under the Ontario *Human Rights Code*, within the time limits specified by that legislation.

7.0 Procedures for resolving complaints

Complainants are encouraged to explain to the person who is harassing or discriminating against them that the conduct is unwelcome but are not obliged to do so. Indeed, each case is different. If addressing the person responsible could lead to an escalation of harassment or discrimination, or to safety risks, complainants should not be expected to have to directly interact with that person. If a complainant feels they can safely make it known to the person responsible that the behaviour is unwelcome, of course this may resolve the matter, or may help them later if they make a complaint. However, the complainant should never feel obliged to address their harasser against their better judgment. **See PO-HR-09 CCA Dispute Resolution Policy.**

If the situation cannot be resolved by speaking to the person responsible, a complaint may be made by speaking to either: (1) the Manager, or (2) Jeff Kerslake

Where possible, the complaint should be made in writing, including details of:

- What happened – a description of the events or situation
- When it happened – dates and times of the events or incidents
- Where it happened
- Who saw it happen – the names of any witnesses, if any?

The Manager receiving the complaint will notify the person(s) complained against (the respondent(s)) of the complaint and provide the respondent(s) with a copy of the written complaint.

If necessary, the complainant or the respondent will be placed on a paid leave of absence, moved to a different location within the organization, or provided with alternative reporting relationships. The decision will be made on a case-by-case basis and will reflect the principle that the complainant will not be penalized for making the complaint.

Every person has a right to claim and enforce their right to a workplace free of harassment and discrimination. No person shall be negatively treated for bringing forward a complaint, providing information related to a complaint, or helping to resolve a complaint. It is a violation of Common Collection Agency Inc. policy to discipline or punish a person because he or she has brought forward a complaint, provided information related to a complaint, or otherwise been involved in the complaint resolution process. Reprisal may be the subject of a complaint under this procedure, and persons engaging in reprisal are subject to disciplinary measures, up to and including termination of employment. **See PR-OP-21 Whistleblower Policy.**




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2.0 Reference

- FR-HR-04 Employee Code of Ethics & Behaviour
- PO-HR-08 Workplace Harassment Policy
- PO-HR-09 CCA Dispute Resolution Policy
- PO-HR-10 Workplace Violence
- PO-HR-11 Employment Equity
- PR-OP-21 Whistleblower Policy

3.0 Change Management Table

Review Date:		20250917	
Approved By:		Amit Chadha	
Position:		Manager, Business Intelligence/Quality Assurance	
Revision #	Revision Date	Description of changes	
01	20160525	Updated QA Manager	
02	20170607	Reviewed	
03	20180604	Reviewed	
04	20190628	Reviewed	
05	20200625	Reviewed	
06	20210628	Reviewed	
07	20220623	Annual Review	
08	20240815	<p>8.0 Scope</p> <p>The right to freedom from discrimination and harassment extends to all employees, including full-time, part-time, temporary, probationary, casual and contract staff.</p> <p>It is also unacceptable for members of Common Collection Agency Inc. to engage in harassment or discrimination when dealing with clients, or with others they have professional dealings with, such as suppliers or service providers.</p> <p>This policy:</p> <ul style="list-style-type: none"> • Applies at every level of CCA, and extends to all partners, employees (including full time, part-time, temporary, casual and contract staff) • Applies to every aspect of the workplace environment and employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline, performance appraisals and termination. • Covers rates of pay, overtime, hours of work, public holidays, vacation time, shift work, corporate training, corrective action, and corporate discipline • Applies to events that occur outside of the physical workplace (such as off-site client meetings, business trips, company parties and to electronic communications) 	
07	20250917	Annual Review Completed	