



POLICY AND PROCEDURES FOR ACCOUNTING, SECURITIES AND LEGAL VIOLATIONS

ADS is committed to the prevention of harassment in the workplace. We will take every reasonable step to protect workers from harassment by or against management, employee's, clients, independent contractors and anyone who has a relationship with the company.

Harassment will not be tolerated from anyone and such actions are considered a serious offence for which immediate action will be taken.

Purpose of Policy

The purpose of this policy is to:

- Identify roles and responsibilities when harassment takes place in the workplace;
- Set out how ADS will respond to reports of harassment in the workplace.

For the purpose of this policy:

"HARASSMENT" means engaging in a course of vexatious comments or conduct against an employee in a workplace that is known or ought to reasonably be known to be unwelcome. This includes any inappropriate conduct, comment, display, action or gesture by a person that:

- adversely affects the employee's psychological or physical well-being and that the person knows or ought to reasonably know would cause an employee to be humiliated or intimidated; and
- constitutes a threat to the health or safety of the employee.

For example: any sexually harassing or offensive conduct described in this policy is prohibited. Prohibited conduct includes but is not limited to:

- Sexual flirtations, touching, advances, or propositions;
- Sexually explicit language or gestures;
- Sexually graphic or suggestive comments about an individual's dress or body;
- Contributing to an offensive overall environment, including the use of vulgar language, the presence of sexually explicit photographs or other materials, and the telling of sexual jokes or stories.
- Using position or status to influence others.

ADS also prohibits the use of racial or ethnic slurs and statements or conduct directed toward a person's religion, gender, ethnic or national origin, or other legally protected status that are intended to demean or diminish that person or that have the effect of creating a hostile work environment.

MANAGERS have a responsibility to assess the risk of harassment to employees, minimizing those risks where necessary or reasonably possible and informing any affected employee of such risk or potential risk. Managers must act respectfully towards others and ensure that all employees have been appropriately trained to recognize the potential for harassment, the procedures.

EMPLOYEES have a responsibility to act respectfully towards others and to inform a manager of any harassment that they experience or witness free from negative consequences for reports made in good faith. Employees are responsible for attending any training or information sessions provided by the employer and co-operating with any efforts to investigate and resolve matters pertaining to this policy. It is in the best interest of all parties to treat people fairly.

Reporting Harassment

When an incident of harassment occurs, an employee should report the incident to their direct manager, a member of the ADS leadership team or through the 3rd party hotline service at 1-888-234-4790.

Investigating Incidents and Complaints

ADS will investigate complaints of harassment promptly. Employees are required to cooperate in any investigation. The Company will communicate the findings of the investigation to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is prohibited.

Privacy

As far as possible, ADS will keep all information relating to an incident or complaint confidential. However, in order to investigate an incident or complaint, the person conducting the investigation may have to interview people in order to get at the facts. As far as possible in doing these interviews, that person will try to protect the identity of those involved, but this will not always be possible.

ADS will disclose information only on a need-to-know basis.

Action by ADS

While the incident or complaint is being investigated, ADS will:

- Limit contact between the parties involved in the incident or complaint
- Assist the affected employee in obtaining help to deal with any stress they may be feeling (refer to the Employee Assistance Program for counselling).

Any employee, supervisor, or manager who is found to have engaged in harassment of another employee will be subject to disciplinary action up to and including discharge.