



Global Respectful Workplace Policy

EFFECTIVE DATE: SEPTEMBER, 2024





Purpose

It is a top priority and commitment for Fiera Capital Corporation and its subsidiaries (collectively, “Fiera Capital”, the “Corporation”, “we”, “our” or “us”) to provide their Employees with a Workplace that is safe, comfortable and free from Harassment, Discrimination, Bullying or any other form of abusive or similarly inappropriate behaviour in the Workplace. This Global Respectful Workplace Policy (the “Policy”) prohibits all forms of Harassment, Discrimination, Bullying or any other form of abusive or similarly inappropriate behaviour in the Workplace.

Fiera Capital condemns any acts in its Workplace that create the potential for Harassment, Discrimination, Bullying or any other form of abusive or similarly inappropriate behaviour in the Workplace.

Definitions

Bullying means abusive, antagonistic, offensive, intimidating, malicious or insulting behaviour (including those occurring virtually through the use of information and communications technology) that would make a reasonable person feel vulnerable, upset, humiliated, embarrassed, undermined, threatened or discriminated against.

Bullying is a mistreatment of others and can take the form of physical, verbal and non-verbal conduct. Legitimate, reasonable and constructive criticism of an Employee's performance or behaviour, and reasonable instructions given to Employees in the course of their employment, do not constitute Bullying.

Discrimination means the differential treatment of a person or group of persons because of personal characteristics that are prohibited grounds under applicable human rights legislation, where there is no *bona fide* occupational requirement necessitating such differential treatment. Such prohibited grounds vary depending on the applicable jurisdiction but generally include race, religion or religious belief, ethnic or national origin, creed, skin colour, sex, gender, gender identity or gender expression, sexual orientation, age, marital status, family status and disability (both physical and mental).

Employee means a director, an officer, a full-time and part-time employee, as well as a permanent and temporary employee of Fiera Capital.

Harassment means any vexatious, abusive, humiliating, hurtful behaviour in the form of repeated, hostile or unwanted conduct or verbal comment, action or gesture (including those occurring virtually through the use of information and communications technology) that affects an Employee's dignity or psychological or physical integrity, or create an intimidating, hostile, degrading, humiliating or offensive environment. For greater certainty, this includes Psychological Harassment and Sexual Harassment. Harassment does not include a reasonable action taken by an employer or supervisor relating to the management and direction of Employees or the Workplace.

Psychological Harassment means any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comment, action, or gesture (including those occurring virtually through the use of information and communications technology) that affects an Employee's dignity or psychological or physical integrity, and results in a harmful environment for the Employee.

A single serious incidence of such behaviour that has a lasting harmful effect on an Employee may also constitute Psychological Harassment.

Sexual Harassment means any vexatious comment or conduct (including a gesture, behaviour or attitude) of a sexual nature (including those in relation to sex, sexual orientation, gender identity or gender expression), whether occurring on a single occasion or repeatedly, that is known, or ought reasonably to be known, as unwelcome. This includes any sexual solicitation or advance where the person making it is in a position to confer, grant or deny a benefit or advancement to the Employee and the person knows, or ought reasonably to know, that the solicitation or advance is unwelcome. Sexual Harassment can also occur virtually through the use of information and communications technology.

Subsidiary means any entity, including corporations, limited partnerships, unincorporated entities or other corporate entities within Fiera Capital’s organizational structure, over which Fiera Capital Corporation has the capability to exercise corporate control (directly or indirectly). For greater certainty, this Policy does not apply to any of the portfolio companies held in Fiera Capital’s funds.

Workplace means all locations where Employees of the Corporation perform work and work-related activities, and includes physical and virtual locations, environments and activities related to work responsibilities, such as conferences, meetings, business trips, temporary assignments and work-related events or work-related social events, including after-hours social events.

Scope and Applicability

This Policy applies to all individuals at Fiera Capital who are engaged in work, work-related activities or work-related relationships between themselves and Fiera Capital. This includes all Employees, as well as Fiera Capital’s consultants, interns and job applicants.

On a yearly basis, all Employees are responsible for reading, understanding and complying with this Policy for a harassment-free Workplace.

This Policy applies to the extent that it does not conflict with the local laws of the countries where the Employees work.

Overview

Fiera Capital is committed to creating a safe, healthy Workplace free of Harassment, Discrimination, Bullying and any other form of abusive or similarly inappropriate behaviour, where mutual respect, dignity, and the ability to work together productively in a safe environment are actively supported. Fiera Capital does not tolerate any form of Harassment, Discrimination, Bullying, and any other form of abusive or similarly inappropriate behaviour conducted by anyone in the Workplace, including any external party (for example, vendors, contractors, clients, etc.) At all times, every individual is responsible for adopting and supporting respectful Workplace behaviour. Fiera Capital is committed to maintaining a culture of inclusivity, diversity and equity that promotes equality and respect through a harmonious and collaborative Workplace.

Responsibilities

Employees

Employees have the following responsibilities relating to this Policy.

- > Be familiar with this Policy and the process to report concerns regarding prohibited conduct, and actively participate in any related mandatory training the Corporation provides.
- > Conduct themselves professionally and with decorum and respect towards other Employees, clients and third parties. Employees shall not engage in any form of Harassment, Discrimination or Bullying, or adopt any other form of abusive or similarly inappropriate behaviour. Employees who violate this Policy may be subject to disciplinary measures, up to and including termination of employment.
- > Maintain the same professionalism, decorum and respect as when physically in the office whenever:
 - Working off the premises, including remote work or while travelling on business;
 - Participating in company-sponsored events;
 - Participating in the volunteering program; and
 - Participating in work-related social events (including after-hours social events), such as team building activities, celebrations, parties or receptions organized by Fiera Capital, etc.
- > Adhere to the Corporation's policies and guidelines, notably this Policy and Fiera Capital's Global Code of Conduct.
- > Employees should engage in conversations that are inclusive and respectful, and ensure their behaviour reflects the Corporation's values.
- > Promptly report (as per the section below entitled "[Reporting](#)") any actual, potential or suspected violation of this Policy, including any retaliatory actions, in accordance with the procedures set out herein. Failure to report may result in disciplinary action or other measures as deemed appropriate.
- > Co-operate fully with internal and external investigations conducted in relation to this Policy.

Managers

In addition to the responsibilities as an Employee set out above, managers also have the following responsibilities:

- > Promote a Workplace free of Harassment, Discrimination, Bullying or any other form of abusive or similarly inappropriate behaviour, including any retaliation in connection thereto.
- > Ensure that Employees they supervise have completed the required training.
- > In collaboration with Fiera Capital's Human Resources Department ("**Human Resources**" or "**HR**"), remind Employees they supervise to read and confirm their understanding of this Policy regarding the Corporation's commitment to maintaining a Workplace free of Harassment, Discrimination, Bullying and any other form of abusive or similarly inappropriate behaviour.
- > Maintain a work environment where Employees feel comfortable and are encouraged to raise their concerns. Be attentive to what is going on in the Workplace (e.g., changes in people's behaviour, or any tension or lack of respect between Employees, etc.).
- > Have one-on-one meetings with the Employees they supervise and discuss their job satisfaction.
- > Coordinate with Human Resources to ensure that all observed or reported instances of possible Discrimination, Harassment, Bullying, or any other form of abusive or similarly inappropriate behaviour in the Workplace are reviewed and analyzed.
- > In the event of an investigation, co-operate with the assigned investigators and, if applicable, discuss the investigation's results with HR, in order to implement the determined course of action based on the investigation's conclusions, and communicate the results of such investigation to the appropriate parties.
- > Take sufficient corrective action to ensure that any prohibited conduct discontinues when the Corporation determines that this Policy has been violated.

Human Resources

In addition to their responsibilities as an Employee (and as a manager, as applicable) set out above, members of HR also have the following responsibilities:

- > Coordinate training and communications regarding Discrimination, Harassment, Bullying and any other form of abusive or similarly inappropriate behaviour, including any retaliation in connection thereto.
- > Ensure that all Employees subject to this Policy have read and confirmed their understanding of this Policy regarding the Corporation's commitment to maintaining a Workplace free of Harassment, Discrimination, Bullying and any other form of abusive or similarly inappropriate behaviour.
- > Continuously monitor the risks and risk factors that could lead to harassment situations, particularly those mentioned in the section of this Policy entitled "Definitions". This could be achieved through various means, including proactive meetings with Employees to discuss their Employee experience, a thorough review of the engagement survey scores, anonymous comments, etc.
- > Hold interviews with Employees who leave Fiera Capital, in order to better understand the reasons for their departure. Track and monitor Employee turnover on a quarterly basis.
- > Promptly address, as per the investigation guidelines in place, reported or observed instances of

Discrimination, Harassment, Bullying and any other form of abusive or similarly inappropriate behaviour, including any retaliation in connection thereto.

- > Review and analyze all reported incidents and determine whether a formal investigation is required.
- > Maintain confidentiality as per the investigation guidelines in place.
- > When a formal investigation is required, conduct a thorough and impartial investigation, and prepare (if applicable) an investigation report, as per the investigation guidelines in place.
- > Discuss the investigation's results with management and implement the determined course of action based on the investigation's conclusions, and communicate the results of such investigation to the appropriate parties.

Procedures for Reporting, Investigation and Resolution

Reporting

Fiera Capital expects Employees acting in good faith to promptly report any actual, potential or suspected violation of this Policy. All reported cases will be promptly reviewed and analyzed, in order to determine whether a formal investigation is required.

If an Employee who, in good faith, feels subjected to Harassment, Discrimination, Bullying or any other form of abusive or similarly inappropriate behaviour, or retaliation in connection thereto, such Employee should do the following:

- > If the Employee feels safe and able, such Employee is encouraged, although not required, to communicate disapproval immediately to the person engaging in the offensive behaviour and request that such behaviour cease immediately.
- > If the Employee feels safe and able, immediately advise their manager and HR representative of the situation. Alternatively, when the Employee is not comfortable speaking to a manager, they may contact any of the individuals listed below:
 - The next level of supervision or management
 - Any member of the Human Resources department
 - Any manager at Fiera Capital
- > Take notes regarding any incidents, the nature of the behaviour, the date and time, witnesses and personal reactions.

Alternatively, as per [Fiera Capital's Ethics Reporting Policy](#), complaints or concerns may be reported anonymously and confidentially through a third-party reporting system online (secure website) at

<https://www.clearviewconnects.com/>, or this dedicated toll-free number: 1 844 525-0585.

Investigation

When an incident is reported or a complaint is received, HR will determine whether a formal investigation is required, which determination may include the involvement of Fiera Capital's legal department. In the event that it is determined that an investigation is required, the investigator(s), who may be internal or external investigator(s), will ensure **(i)** that their investigation is thorough, **(ii)** that both the complainant and the person under investigation will have a full and fair opportunity to tell their version of events and, when possible, in order to ensure fairness, have their allegations verified through witnesses, **(iii)** that their investigation is completed in a timely matter, while noting that the length of the investigation may vary depending on the level of complexity of the investigation, and **(iv)** to conduct a process that is as confidential as possible under the circumstances. The investigation may involve the review and collection of any relevant evidence, including documents, electronic files and communications (e.g., emails, text messages, etc.).

Resolution Process

1. The HR representative, and when appropriate the Employee's manager, review and evaluate the complaint.
2. The HR representative, with the required assistance (as the case may be), will make a determination of the appropriate action, such as mediation, investigation, etc.
3. If it is determined that a formal investigation is required, a formal investigator(s) (which may be an employee of Fiera Capital or an external investigator) will be appointed to conduct the investigation and the investigator will notify and inform the relevant parties.
4. The investigator shall conduct its investigation based on the principles outlined in the section above entitled "Investigation" and present the findings to Fiera Capital's Senior Vice President, Human Resources (or any other person with an equivalent title or their delegate) (the "**HR Responsible Person**").
5. The HR Responsible Person shall review each case and renders a decision as to whether a Policy violation has taken place:
 - After the investigation, if the complaint is founded in whole or in part, Fiera Capital will take prompt, appropriate and effective remedial action to address and resolve the issues raised in the complaint and prevent such conduct from recurring.
 - When appropriate, the Employee's manager will be responsible for taking disciplinary action according to the established policies and procedures. Such action may include disciplinary measures or other corrective action, up to and including termination of employment.
 - Management and HR must coordinate to ensure they communicate the investigation's

results to the appropriate parties and that the investigation is promptly closed.

6. Upon final resolution, the HR representative or the HR Responsible Person will ensure that proper communication with the parties involved takes place, in accordance with applicable legislation and in a confidential manner.

Record Retention

The Corporation will retain records relating to any complaint, concern or submission, and to the processing and investigation thereof, for a period of at least two years and in accordance with applicable legislation. The types of records the Corporation retains must include all steps taken in connection with the processing and investigation, and the results of any such investigation.

Confidentiality

The names of the individuals involved in the complaint and the content of the complaint will remain confidential, except where disclosure is necessary for the purpose of investigating the incident or taking measures in relation to it, in accordance with this Policy or other policies or proceedings related to the incident, or otherwise where disclosure is required by law or regulation. At all times during any investigation relating to this Policy, detailed information about the complaint will be kept in a confidential file accessible only to authorized people who need to consult such information as part of their functions.

Reprisal and Retaliation

Fiera Capital will not tolerate any reprisal, retaliation or adverse employment consequences against any person who reports an incident or who provides information to an investigator in good faith in relation to this Policy.

Any Employee who engages in or threatens any reprisal or retaliation against a person who has, in good faith, reported an incident or assisted in an investigation conducted in accordance with this Policy will be subject to disciplinary measures, up to and including termination of employment.

Disciplinary Measures

Fiera Capital will take such disciplinary or other measures (up to and including termination of employment), as it deems appropriate, in relation to any Employee who is determined, after investigation, to have violated this Policy and may, depending on the jurisdiction and outcome, be required to report the nature and outcome of the disciplinary process to the relevant regulator.

Training

The Corporation provides mandatory training in connection with this Policy to all Employees on a yearly basis, including e-learning modules to be completed on the Skillsoft platform. In this training, Employees will learn why it is important for a company to foster a respectful work environment, and what strategies exist for addressing inappropriate behaviour in the workplace, in order to prevent the different forms of harassment. All Employees are required to complete the training, as well as read and acknowledge this Policy.

Training on the Corporation's investigation guidelines and procedures is also provided to our human resources business partners.

Policy Review

This Policy is reviewed on an annual basis.



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