



Global Respectful Workplace Policy

EFFECTIVE DATE: SEPTEMBER 2023



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Purpose

It is Fiera Capital's top priority and commitment to provide its employees with a workplace that is safe, comfortable and free from harassment and discrimination. The firm's Global Respectful Workplace Policy prohibits all forms of harassment and discrimination at work. This includes, but is not limited to, harassment based on a person's race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital or family status, or disability/handicap.

Fiera Capital condemns any acts in its work environments that create the potential for harassment or discrimination in any form, both in terms of individual employee morale, company values and the violation of applicable laws.

Scope

The Global Respectful Workplace Policy applies to all (including but not limited to) the following:

- > Companies and subsidiaries within Fiera Capital, including its major business segments (each, a "Business"), divisions and direct and indirect subsidiaries.
- > Majority-owned or controlled joint ventures and other majority-owned or controlled entities and operations.
- > Directors, officers, employees, contractors and any other persons who work with or for Fiera Capital and its affiliates.
- > Applicants and third parties ("non-employees"), including but not limited to subcontractors, suppliers, consultants, customers, visitors and volunteers.

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

The Global Respectful Workplace Policy applies to all work-related incidents on and off the regular work sites occurring during and outside normal working hours, including during business trips, conferences, meetings, receptions, social activities and any events authorized by the company.

On a yearly basis, all employees are responsible for reading, understanding and complying with Fiera Capital's Global Respectful Workplace Policy for a harassment-free workplace.

Overview and Application

Fiera Capital is committed to creating a safe, healthy work environment free of harassment and discrimination, where mutual respect, dignity, and the ability to work together productively in a safe environment are actively supported. 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 work environment.

Definitions

Harassment: Any vexatious, abusive, humiliating, hurtful behaviour in the form of repeated, hostile, or unwanted conduct or verbal comments, actions or gestures that affect an employee's dignity or psychological or physical integrity or create an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual Harassment: Any unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature when:

- > submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or
- > an individual's submission to or rejection of such conduct is used as a basis for employment decisions affecting such individual, or
- > such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Unwelcome does not mean "involuntary." A victim may consent or agree to certain conduct and actively participate in it even though it is offensive and objectionable. Therefore, sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome. Whether the person welcomed a request for a date, sex-oriented comment, or joke depends on all the circumstances.

Discriminatory Harassment: This is also considered psychological or sexual harassment if it is based on any of the grounds set out in the relevant [Charter of Human Rights and Freedoms](#) for each location:

- > Race, colour, ethnic or national origin
- > Age, language, sex, pregnancy, civil status
- > Gender identity or expression, or sexual orientation
- > Religion, social condition, or political convictions
- > Disability or the use of any means to palliate a handicap

Psychological Harassment: Any vexatious, undesired behaviour in the form of repeated conduct, verbal comments, actions, or gestures:

- > that are hostile or unwanted;
- > that affect the employee's dignity or psychological or physical integrity; or
- > that make the work environment harmful.

Harassers may seek to belittle or discredit the victim(s), isolate the victim(s), or put them down in front of work colleagues. The harassment may take the form of threats, humiliation and/or bullying. Psychological or sexual harassment can occur at any level in a company's hierarchy.

Responsibilities

Employees

- > Be familiar with the policy and process to report concerns of prohibited conduct, and actively participate in any related mandatory training the firm provides.
- > Adopt and show proper behaviours at all times. Do not harass, discriminate or retaliate against any individual based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital or family status or disability/handicap.
- > File a report immediately (through the proper channels) if you perceive yourself, another employee or any person referenced as a victim of possible discrimination, harassment or retaliation as specified in the definitions.
- > Cooperate fully with internal, external and related investigations.

Managers and Leaders

- > Promote a work environment free of discrimination, harassment and retaliation.
- > Participate in required training and ensure employees complete required training.
- > Ensure employees have read and confirmed their understanding of Fiera Capital's Global Respectful Workplace Policy and other related policies regarding the firm's commitment to maintaining an environment free of harassment and discrimination.
- > Maintain an environment where employees feel comfortable and are encouraged to raise concerns.
- > Promptly address and report all observed or disclosed instances of possible discrimination, harassment or retaliation to HR (Human Resources) or through the ClearView Connects™ confidential channel.
- > Coordinate with HR or their representative to ensure all observed or reported instances of possible discrimination, harassment or retaliation are investigated and cooperate with assigned investigators.
- > Review investigation results with HR or your representative to draft a written management response based on any investigation conclusions.
- > Coordinate with HR or your representative and communicate the results of an investigation to the appropriate parties.
- > Take sufficient corrective action to assure that all prohibited conduct discontinues when the firm determines that this policy has been violated. Based on the seriousness of the offence, it may include employee discipline up to and including dismissal.

Human Resources

- > Coordinate training and communication regarding discrimination, harassment and retaliation.
- > Promptly address reported or observed instances of inappropriate behaviour.
- > Conduct thorough, impartial investigations.
- > Review investigation results with management and prepare a written management response.
- > Coordinate with management to communicate the investigation results and any corrective action to the appropriate parties.

Complaint and Resolution Process

Reporting

Fiera Capital expects employees to immediately report any observed or experienced instances of possible harassment or discrimination. All reported cases will be promptly investigated. This policy does not require reporting harassment and discrimination directly to an employee's immediate supervisor or any individual who is perceived to be perpetrating the harassment and discrimination. If an employee is subjected to harassment or discrimination, the employee should do the following:

- > If the employee feels safe and able, make the disapproval or uneasiness known to the alleged harasser immediately. In the interest of avoiding ambiguity, it should be made clear that the action of the alleged harasser is unwelcome and is perceived as harassment under the terms of the policy.
- > If the employee feels safe and able, immediately advise her/his 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 Human Resources
 - Any People Manager at Fiera Capital or any of its subsidiaries
- > 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 and Complaint Resolution

When the facts surrounding a complaint are disputed or require verification, an investigation may be appropriate. The inquiry will ensure 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, to ensure fairness, their allegations are verified through witnesses.

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The employee's manager and HR Representative review the complaint.

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The HR Representative or an external investigator may investigate and present the findings to Fiera Capital's Senior Vice President, Human Resources.

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The Senior Vice President, Human Resources reviews 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 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.
 - > The employee's manager will be responsible for issuing disciplinary action according to the established policies and procedures. Such action may include punitive measures or other corrective action up to and including the dismissal of any colleague found to have violated this policy.
 - > Management and HR must coordinate to ensure they communicate the investigation results to the appropriate parties and that the investigation is promptly closed.
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Upon final resolution, the Senior Vice President, Human Resources will ensure that a proper communication to the parties involved take place, in a privileged and confidential manner.

Record Retention

The firm will retain records relating to any complaint, concern or submission and to the processing and investigation thereof for a period determined to be appropriate based upon the nature and merits of the submission. The types of records the firm retains must include records of all steps taken in connection with the processing and investigation and the results of any such investigation.

Confidentiality

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.

The names of the individuals involved in the complaint and the contents of the complaint will remain confidential except where disclosure is required by law, needed for an investigation of the complaint or for taking disciplinary measures related to the disciplinary action, or where the individuals concerned grant their consent to such disclosure.

Reprisal and Retaliation

In recognizing that some incidents might yield negative consequences or be dismissed upon investigation, it is understood that we will not tolerate any reprisal or retaliation against any person who discloses a situation they believe to be harassment, discrimination or workplace violence or who provides information regarding a complaint or an incident of this nature.

Fiera Capital will ensure that such individuals are not dismissed, demoted, suspended, disciplined, threatened, harassed, discriminated against or disadvantaged.

Any individual who engages in any reprisal or threatens reprisal is subject to administrative or disciplinary measures up to and including dismissal.

Any person who is not directly affected by the incident but has reported and supported the person concerned will not face reprisal or retaliation for their actions.

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