



## Deloitte Policy Manual – Canada

### Policy 166 – Human rights and harassment in the workplace

#### Introduction

Deloitte's Code of Conduct, Ethical Principles and Shared Values express our commitment to creating a respectful work environment which attracts, retains and encourages the best, most diverse and most talented people to flourish.

This policy demonstrates Deloitte's commitment to providing a respectful workplace which is safe and free of harassment and discrimination and where there is equal opportunity for all to succeed. The policy applies all to employees, associate partners and partners of Deloitte ("Firm Members"). To the extent possible, this policy also applies to individuals interacting with Firm Members during the course of Firm business or Firm matters, such as contractors, clients and visitors.

This policy supports human rights and occupational health and safety legislation and is the companion policy to Deloitte's [Workplace violence policy](#) which addresses violence in the workplace.

#### Policy & Guidance

1. Deloitte values the health, safety and wellbeing of all of its people, and expects that its workplace(s) will be free from workplace harassment and discrimination.
2. **Deloitte will not tolerate workplace harassment or discrimination perpetrated by or against any Firm Member on Deloitte Premises, which include the following locations:**

- Deloitte offices
- Client sites, while attending for the purpose of conducting work
- Deloitte organized functions and recreational or social events, whether taking place in Deloitte offices or elsewhere (collectively, "Deloitte Premises")

Workplace Harassment and Discrimination Defined

3. **Workplace Harassment includes, but is not limited to, the following conduct:**
  - **Engaging in a course of vexatious comments or conduct against one or more Firm Members that is known or ought reasonably to be known to be unwelcome, intimidating and/or humiliating**
  - **Any vexatious behaviour, in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects a Firm Member's dignity or psychological or physical integrity; and that results in a harmful work environment for the Firm Member**
  - **Engaging in course of conduct, comment or contact of a sexual nature by or against a Firm Member that is likely to cause offence or humiliation or that might, on reasonable grounds, be perceived as placing a condition of a sexual nature on employment or opportunity for staffing, training or promotion**
  - **Abusive or unacceptable comments or conduct by or against a Firm Member related to a ground of discrimination (as set out below) that is known, or ought reasonably to be known, to be unacceptable. It can be expressed in a number of ways, including but not limited to, unwanted advances, suggestive or aggressive remarks, racial or ethnic slurs, or practical jokes which result in humiliation**

**Workplace Harassment can be a onetime event where it is serious and has a lasting impact, or may occur over a period of time**

4. **Workplace Discrimination occurs when any Firm Member is denied opportunity for hiring, staffing, training, promotion or benefits for reasons unrelated to ability and performance, but rather, related to their race, perceived race, ancestry, ethnic origin, citizenship, creed, colour, religion, age, sex, sexual orientation, gender identity, marital status, family status, physical or mental disability,**

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political belief, affiliation or activity, social condition, lawful source of income, association or pardoned conviction.

5. **The normal exercise of Deloitte's management rights including, but not limited to, the actions listed below will not be considered a breach of this policy:**
  - **Hiring, termination and promotion**
  - **Assignment of tasks or engagements**
  - **Performance management**
  - **Disciplinary measures**
  - **Refusal to hire and/or termination of employment due to criminal record, where it is bona fide occupational requirement**
  - **Appropriate operational decisions and directives**

#### Reporting Workplace Harassment and/or Discrimination

6. **Firm Members who believe they have experienced Workplace Harassment and/or Discrimination should do the following as soon as possible after the incident:**
  - **If comfortable doing so, the Firm Member should privately tell the person who has acted inappropriately that their behavior is unacceptable**
  - **If the Firm Member is not comfortable speaking directly with the person involved or if there have been numerous incidents involving the person, the Firm Member should speak with their talent advisor or their business leader (partner/associate partner) or contact the Ethics Helpline**
  - **Regardless, the Firm Member should document the date(s), time(s), location(s), potential witnesses and nature of the incident(s)**
7. **If a Firm Member observes or becomes aware of an incident of Workplace Harassment and/or Discrimination, the Firm Member should contact a talent advisor, their business leader and/or the Ethics Helpline.**

#### Investigation of Workplace Harassment and/or Discrimination

8. **Complaints of Workplace Harassment and/or Discrimination, and complaints of retaliation will be promptly investigated by a trained investigator(s).**
  - **The investigation process will be completed in a timely manner and will be undertaken with care, fairness and with sensitivity, with only those who need to know being involved in the investigation process**
9. **Where it has been determined that there has been a breach of this policy, appropriate disciplinary action will be taken.** Such actions may include, but are not limited to:
  - **Disciplining Firm Members, up to and including termination of employment for cause**
  - **Reporting the conduct of any other person to their employer**
  - **Reporting to the police**

#### Retaliation

10. **Deloitte will not tolerate retaliation against any Firm Member who has made a complaint or provided information regarding an incident of Workplace Harassment and/or Discrimination in good faith. Retaliation includes:**
  - **Acts of reprisal that occur because a person has complained of or provided information about, an incident of Workplace Harassment and/or Discrimination**
  - **Intentionally pressuring a person to ignore or not report an incident of Workplace Harassment and/or Discrimination**
  - **Intentionally pressuring a person to lie or provide less than full cooperation with an investigation of a complaint of Workplace Harassment and/or Discrimination**

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11. **Retaliation or threat of retaliation for making a complaint or for providing information regarding a complaint should be reported to the talent advisor.**
12. **Any Firm Member who engages in retaliation or threats of retaliation may be subject to disciplinary measures up to and including termination of employment for cause.**
13. **Any Firm Member who makes a false report or otherwise abuses this policy may be subject to disciplinary measures up to and including termination of employment for cause.**

[Link to related FAQs here](#)