

Version: 24.0	Workplace Violence and Harassment Prevention Policy and Program	
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Brunel Energy, Inc.

Workplace Violence and Harassment Prevention Policy and Program

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, “the Company,” is committed to preventing workplace violence and harassment. This policy defines behavior that constitutes workplace violence and harassment and explains procedures for reporting and resolving such incidents.
- 1.2. The Company committed to providing a working environment free of violence and harassment by familiarizing all workplace parties with the related terminology as well as their individual responsibilities for prevention and corrective action.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Physical assault** is any physical force or threat of physical force to create fear and control another person. Some examples include hitting, blocking, shoving, choking, slapping, or biting, or pulling hair; “caring” for the victim in an abusive way, threats of violence, and using a weapon or other objects to threaten, hurt or kill.
- 3.2. **Sexual assault** is any unwanted sexual act done by one person to another. Examples include: kissing or forcing/coercing the person into kissing; touching the person’s body with or without clothes on; forcing/coercing the person to masturbate; sexual intercourse (anal or vaginal), penetrating with an object; causing bodily harm; removing or attempting to remove clothing; taking advantage of a position, trust or authority to get sex; and threatening to harm someone else if the person does not agree to do any of these things.

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- 3.3. **Sexual harassment** is often interpreted as objectionable comments or conduct of a "sexual" nature. However, sexual harassment, in the broader context of unequal treatment based on gender, may refer to instances where the behavior is not overtly sexual in nature, but is related to the person's gender, and demeans or causes personal humiliation or embarrassment to the recipient. Examples include degrading words, rude jokes or sexual comments, name calling (e.g., "chick," "bitch"), physical contact, sexual demands, unwanted kissing or touching of a sexual nature, and insulting remarks about the person's sexual orientation, race, culture, ability, and/or income.
- 3.4. **Threat (verbal or written)** is a communicated intent to inflict physical or other harm on any person or to property by some unlawful act. A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to do harm, for example, "I am going to make you pay for what you did to me." A conditional threat involves a condition, for example, "If you don't leave me alone you will regret it." Veiled threats usually involve body language or behaviors that leave little doubt in the mind of the victim that the perpetrator intends to harm.
- 3.5. **Verbal/Emotional/Psychological** abuse is a pattern of behavior that makes someone feel worthless, flawed, unloved, or endangered. Like other forms of abuse, it is based on power and control. Examples include swearing, put-downs/name calling over a period of time, labelling the victim in a derogatory way such stupid, crazy, or irrational, acts of humiliation, extreme jealous behavior, attacking the victim's self-esteem in other ways. It can also include harming pets and damaging property.
- 3.6. **Workplace Bullying** is repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment.
- 3.7. **Domestic Violence** and its effects can show up at work in the form of reduced productivity, absenteeism, and increased risk of violence in the workplace. Any employee who has obtained an order or protection or restraining order against an individual should notify the Federal Protective Service or security personnel and, where possible, provide them with a picture of that individual. In cases where there is a clear threat to workplace safety the Assessment and Response Team will be convened as needed. Employees who are victims of domestic violence can contact the HR or their supervisor for assistance. Supervisors, team leaders, and co-workers who suspect an employee is being abused at home can contact their supervisor for assistance. Further, information is available in the Office of Personnel Management (OPM) Guidebook: Responding to Domestic Violence: Where Federal Employees Can Find Help; copies can be obtained from your servicing personnel office or online from OPM at the address shown in Appendix 2.

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4. Responsibilities

4.1. Employer:

- 4.1.1. Ensure that measures and procedures in the violence and harassment prevention program are carried out. Hold management accountable for responding to and resolving complaints of violence.
- 4.1.2. Ensure compliance by all who have a relationship with the organization, such as physicians, contractors, volunteers, etc.
- 4.1.3. Have a copy of this policy available in the workplace.
- 4.1.4. Conduct regular risk assessments.
- 4.1.5. Establish and deliver training and education for all employees.
- 4.1.6. Integrate safe behavior into day-to-day operations.
- 4.1.7. Develop a reporting process for incidents of workplace violence and harassment.
- 4.1.8. Investigate all reports or threats of violence/harassment in a prompt, objective, and sensitive way.
- 4.1.9. Take corrective action.
- 4.1.10. Provide response measures.
- 4.1.11. Facilitate medical attention and support for those involved directly or indirectly.
- 4.1.12. Include information and particulars prescribed by the Occupational Health and Safety Act and regulations.

4.2. Managers/HSE Supervisors:

- 4.2.1. Enforce policy and procedures and monitor worker compliance.
- 4.2.2. Identify and alert staff to violent persons and hazardous situations.
- 4.2.3. Investigate all workplace violence using the organization's accident investigation procedure and form, and contact the police as required.
- 4.2.4. Facilitate medical attention for employee(s) as required.
- 4.2.5. Debrief those involved in the incident either directly or indirectly.
- 4.2.6. Contact human resources to ensure the employee receives further counselling about her/his legal rights.
- 4.2.7. Track and analyze incidents for trending and prevention initiatives.
- 4.2.8. Immediately report a death or critical injury to the police
- 4.2.9. Report the circumstance to all parties in writing within 48 hours. Include information and particulars prescribed by the regulations.
- 4.2.10. Ensure the workplace violence and harassment prevention program is reviewed at least once a year.

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4.3. Employees:

- 4.3.1. Participate in education and training programs so you can respond suitably to any incident of workplace violence or harassment.
 - 4.3.2. Understand and comply with the violence and harassment prevention policies and related procedures.
 - 4.3.3. Report all incidents or injuries of violence/harassment, suspicious behavior, or threats of violence/harassment to your supervisor immediately regardless of the relationship between the individual who initiated the threat or behavior.
 - 4.3.4. Contribute to risk assessments.
 - 4.3.5. Seek support when confronted with violence/harassment or threats of violence.
 - 4.3.6. Get medical attention if needed for possible problems that could escalate into threatening behavior.
 - 4.3.7. At least once a year, participate in a review of the workplace violence and harassment prevention program.
- 4.4. **All Employees** are responsible for reporting any unusual or questionable behavior or circumstances to the HR Department or Supervisor/Management. In addition, you have a duty to promptly notify your supervisor regarding any act or threat of violence that you witness regardless of being personally involved. Your report will be held in confidence to the maximum extent possible, and we will not condone any form of retaliation against you for making a report. We will not knowingly employ any individual who has demonstrated past behaviors indicating violent tendencies.

5. Requirements

5.1. Risk assessment

- 5.1.1. Management (with worker involvement) assesses workplace violence hazards in all jobs, and in the workplace as a whole. It reviews risk assessments annually, as well as when new jobs are created, or job descriptions are changed substantially.

6. Procedure

6.1. Reporting and Investigation

- 6.1.1. Workers are to report all violence-related incidents or hazards to their manager or supervisor. This report can be made confidentially at the employee's request.
- 6.1.2. However, sharing information to ensure the safety of others and prevent recurrence may be necessary (e.g., contents of a police report).
- 6.1.3. The reporting worker may make the report confidentially without leaving a copy in the log, indicating the need for confidentiality to her/his direct manager or supervisor (or in that person's absence, to another manager or supervisor).

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- 6.1.4. The manager or supervisor receiving the report investigates it and ensures that measures are taken to safeguard employees and curtail violence or harassment.
- 6.1.5. No report of workplace violence/harassment or risks of violence may be the basis of reprisal against the reporting employee.

6.2. Response Procedures

- 6.2.1. Using the incident investigation form, the manager or supervisor documents all reports of workplace violence/harassment, hazards and measures taken to address them.
- 6.2.2. If the resolution of the incident is beyond the authority of a manager or supervisor, she/he must make the HR Manager or upper management aware of the report. The HR Manager or upper management involves other managers or supervisors in the investigation as appropriate (e.g., when the incident involves clients or employees under another manager’s or supervisor’s area of responsibility).
- 6.2.3. Management reviews all incident reports, monitors trends and makes recommendations to the HR Manager or upper management for prevention and enhancements to the workplace violence and harassment prevention program.
- 6.2.4. The HR Manager or upper management reviews reports of workplace violence/harassment and ensures that actions are taken.
- 6.2.5. The managers or supervisors who investigate the reported incident warn all staff who might be affected about dangerous situations. They also tell the reporting employee about the outcome of the investigation to help minimize the chance of similar incidents.

6.3. Emergency response measures

- 6.3.1. Any emergency response necessary will be taken immediately. Create and utilize a special “code word” for workplace violence emergencies, e.g., “Code Green” if radio or telephonic communications are possible at the site. Any violent act in the workplace must be immediately addressed and personnel should get out of the area and away from the immediate threat. In an emergency situation:
 - 6.3.1.1. Secure your own safety and then,
 - 6.3.1.2. Call security personnel or the local police.
 - 6.3.1.3. In contacting 911 of the nature of the emergency, be as specific as possible including the location of the threat, how many persons are involved, and the identity of the person involved.
 - 6.3.1.4. If you can safely do so, keep the involved parties calm and separate until help arrives.
 - 6.3.1.5. If leaving your work area would expose you to harm, “barricade-in-place” by closing and barricading work area (office, storeroom, control room, shop area, etc.) doors and seek cover within your immediate area. Stay in place until the “all clear” signal is given or as instructed by emergency responders.

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6.3.1.6. Medical attention should be obtained for any injured individuals.

6.3.1.7. If an employee or visitor has a firearm or other dangerous weapon at the worksite. Do not attempt to disarm the individual yourself.

6.4. Support for employees affected by workplace violence.

6.4.1. Management will respond promptly, assess the situation, and ensure that these interventions are followed:

6.4.1.1. Facilitation of medical attention;

6.4.1.2. Debriefing (by skilled professional);

6.4.1.3. Referrals to community agencies, treating practitioner and employee assistance program;

6.4.1.4. Referral to trade union;

6.4.1.5. Completion of incident reports,

6.4.1.6. Reporting to police (as required); and

6.4.1.7. Team debriefing.

6.5. Risk assessment

6.5.1. Management (with worker involvement) assesses workplace violence hazards in all jobs, and in the workplace as a whole. It reviews risk assessments annually, as well as when new jobs are created, or job descriptions are changed substantially.

7. Training

7.1. Employees will receive both general and site-specific orientation to the workplace violence and harassment prevention program. In addition, all employees will receive an annual review of the program's general and site-specific components.

8. Recordkeeping

8.1. All records of reports and investigations of workplace violence and harassment are kept for five years.

9. Appendix

9.1. Emergency Response Checklist

9.2. Emergency Phone Numbers

9.3. Resources

9.4. Employee Emergency Information Sheet

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EMERGENCY RESPONSE CHECKLIST

COPING WITH THREATS AND VIOLENCE

For an angry or hostile encounter

- Stay calm by taking deep, slow breaths
- Listen attentively
- Maintain eye contact
- Be courteous and patient
- Keep the situation in your control
- Maintain a calm, quiet tone of voice
- Attempt to avoid arguing or making statements that might intensify the individual's angry/hostile demeanor

For a person shouting, swearing, and threatening

- Signal a coworker or supervisor that you need help
- Have someone call security personnel
- Do not make any calls yourself
- Avoid statements and/or behaviors that could escalate the individual's threatening statements/behavior.

For someone with a weapon

- Stay calm
- Maintain eye contact
- Stall for time
- Keep talking...but follow instructions of the person with the weapon
- Don't risk harm to yourself and others
- Don't ever try to be a hero
- Never try to grab a weapon
- Watch for a safe chance to escape, then contact security personnel or local police if they have not already been contacted

TELEPHONED SUICIDE OR BOMB THREATS

- Stay calm. Keep talking
- Do not hang up
- Signal a coworker or supervisor to contact security personnel
- Ask the caller to repeat the message; write it down
- For a bomb threat, ask where it is and when it will go off; repeat these questions if necessary
- Listen for background noises; write down what you hear
- Write down whether it is a man or a woman; pitch or tone of voice or accent; anything you notice
- Try to get the caller's name, location, and phone number

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EMERGENCY PHONE NUMBERS

Security Office: _____

Health Unit: _____

Police: _____

Ambulance: _____

Personnel: _____

EAP: _____

Federal Protective Service: _____

Other: _____

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RESOURCES

GOVERNMENT:

**Office of Personnel Management
Employee Relations and Health Services Center**

1900 E Street, NW
Washington, DC 20415

<http://www.opm.gov/>

Publications: *A Manager's Handbook: Handling Traumatic Events*
(Search site)

https://archive.opm.gov/Employment_and_Benefits/worklife/

*Responding to Domestic Violence: Where Federal
Employees Can Find Help* (Search site)

https://archive.opm.gov/Employment_and_Benefits/worklife/

Department of Health and Human Services

Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati, Ohio 45226-1998

<http://www.cdc.gov/niosh/homepage.html/>

Publication:

*Violence in the Workplace:
Risk Factors and Prevention Strategies*

Department of Justice

**National Institute of Justice
National Criminal Justice Reference Service
Bureau of Justice Assistance Clearinghouse**
P.O. Box 6000
Rockville, MD 20849-6000

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(800) 851-3420

<http://www.ncirs.gov/>

Publications:

Violence and Theft in the Workplace

The Cycle of Violence

Psychoactive Substances and Violence

Department of Justice

Violence Against Women Office

<http://www.usdoj.gov/vawo/>

Department of Labor

Occupational Safety and Health Administration

200 Constitution Avenue, SW, Room N3107

Washington, DC 20210

General Information: (202) 219-8031

Publications: (202) 219-4667

<http://www.osha.gov>

Department of Labor

Women's Bureau

200 Constitution Avenue, NW

Washington, DC 20210

(202) 219-6665

<https://www.dol.gov/wb/>

Publication: *Domestic Violence: A Workplace Issue*

NON-GOVERNMENT: American Psychiatric Association

Division of Public Affairs 1400 K Street,

NW Washington, DC 20005

<http://www.psych.org/>

Publication: *Violence and Mental Illness*

American Psychological Association

1200 17th Street, NW

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Washington, DC 20236
(202) 955-7600
<http://www.apa.org/>

National Center for Victims of Crime
2000 M Street NW, Suite 480,
Washington, DC 20036
(202) 467-8700
<https://victimsofcrime.org/>

National Coalition Against Domestic Violence
Denver Office (Main)
1 Broadway, Suite B210
Denver, CO 80203
(303) 839-1852

If you are in crisis and need to speak to someone, please contact the National Domestic Violence Hotline at 1 (800) 799- 7233 (SAFE) or visit www.ndvh.org.
<http://www.ncadv.org/>

National Domestic Violence Hotline
(800) 799-SAFE
(800) 787-3224 (TTY)
<http://www.thehotline.org/>

National Organization for Victim Assistance
1757 Park Road, NW
Washington, DC 20010
(202) TRY-NOVA
<https://www.trynova.org/>

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EMPLOYEE EMERGENCY CONTACT INFORMATION SHEET

Use of this information sheet is voluntary. The completed form can be given to your supervisor, who will retain it in his/her files and use the information only in the event of an emergency requiring notification of a relative or significant other. If you elect to provide this information to your supervisor, whether using this sheet or in another fashion, you should update it whenever there are changes.

Employee Name:	
Home Address:	
Home Phone Number:	
Emergency Contact Person: (Name and Phone Numbers)	
Alternate Contact: (Name and Phone Number)	
Physician Name: Phone Number:	
Blood Type:	
Allergies:	
NOTE TO SUPERVISORS: The information on this sheet is confidential and should be stored in a secure location; access to the information should be limited to those with a need to know during an emergency.	