



FEBRUARY 2021

Copperleaf Equal Opportunity Policy



Table of Contents

1	Copperleaf Equal Opportunity Policy	1
1.1	Introduction	1
1.2	Purpose and Scope of Policy	1
1.3	Legal Obligations	1
1.4	Policy Statement	2
1.5	Responsibilities and Reporting Procedure (“Whistle-Blowing”)	2
1.6	Sanctions for Breach	2
1.7	Monitoring Compliance.....	3
1.8	Training	3

1 Copperleaf Equal Opportunity Policy

1.1 Introduction

One of Copperleaf's core values is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities. Copperleaf's reputation for being an equal opportunity employer and prohibiting discrimination or harassment of any kind is of paramount importance.

1.2 Purpose and Scope of Policy

This Policy sets out Copperleaf's position on being an Equal Opportunity Employer.

This Policy applies to all permanent and temporary employees of Copperleaf (including any of our intermediaries, subsidiaries or associated companies). All employees and associated persons are expected to adhere to the principles set out in this Policy.

1.3 Legal Obligations

Anti-discrimination law refers to the law that people have the right to be treated equally. Canada has the Canadian Human Rights Act. In this act, there are 11 grounds of discrimination protected under this act. These are:

- race
- national or ethnic origin
- colour
- religion
- age
- sex
- sexual orientation
- marital status
- family status
- disability
- a conviction for which a pardon has been granted or a record suspension has been ordered

Copperleaf conducts business in several countries and Copperleaf is committed to understanding and being compliant with anti-discrimination laws and practices in each of those countries.

1.4 Policy Statement

Copperleaf is an equal opportunity employer and prohibits discrimination and harassment of any kind. Copperleaf is committed to the principle of equal employment opportunity for all employees and provides all employees with a work environment free of discrimination and harassment.

Copperleaf is committed to supporting and valuing the diversity of the people, organizations and communities we serve. Valuing diversity is recognizing and respecting human differences and similarities. Copperleaf is committed to employment diversity with respect to all aspects of employment. All decisions regarding recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, will be made without regard to race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, or a conviction for which a pardon has been granted or a record suspension has been ordered. Copperleaf will endeavour to eliminate systemic barriers to hiring and/or advancement of discriminated groups. Everyone at Copperleaf has a role to play in supporting our commitment to diversity and employment equity. Each employee, regardless of position, is responsible for applying the Copperleaf's Equal Opportunity Policy on an ongoing basis. Each employee is expected to treat all other employees with dignity and respect and in a fair and non-discriminatory manner in all dealings.

1.5 Responsibilities and Reporting Procedure (“Whistle-Blowing”)

It is the duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this policy and to prevent, detect and report any suspected discrimination or harassment. The duty to prevent, detect and report any incident of discrimination or potential risks, rests not only with the leadership team of Copperleaf but equally to all employees.

Copperleaf encourages all employees to be vigilant and to report to the leadership team or the HR Generalist, any unlawful conduct, suspicions or concerns promptly and without delay so that investigation may proceed, and any action can be taken expeditiously. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. Copperleaf is committed to taking appropriate action against discrimination and harassment. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

Copperleaf will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are also committed to ensuring nobody suffers any detrimental treatment.

1.6 Sanctions for Breach

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with Copperleaf's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal for cause.

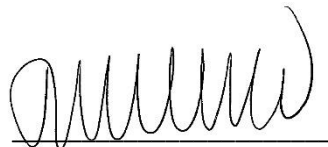
1.7 Monitoring Compliance

Copperleaf's VP of Employee Experience has lead responsibility for ensuring compliance with this policy and will review its contents on a regular basis (at least annually). The VP of Employee Experience will be responsible for monitoring compliance and will report any non-compliance in this regard to the leadership team of Copperleaf who have overall responsibility for ensuring this policy complies with Copperleaf's legal and ethical obligations.

1.8 Training

Training on this policy forms part of the orientation process for all new employees. All existing employees will receive relevant training on the details of this policy upon its implementation. In addition, all employees will be asked to formally accept conformance to this policy annually.

Signed by:

A handwritten signature in black ink, appearing to read 'Judi Hess', is written over a horizontal line.

Judi Hess
Chief Executive Officer