

WORKPLACE NON-HARASSMENT POLICY

(Revised June 2005)

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1.0 Policy

BP Canada is committed to providing a safe and respectful work environment for all employees, contractors and consultants. It is the policy of the Company that no individual will be subjected to harassment. Personal harassment which involves unwelcome disrespectful behavior that is demeaning or embarrassing is prohibited.

1.2 Application

This policy applies to all employees in the workplace of BP Canada including temporary, contract, and prospective employees. This policy also applies to suppliers, contractors, and consultants in their dealings with BP Canada. For the purposes of this policy, the workplace is defined as any place where Company business is conducted and also includes Company functions.

1.3 Definitions

For the purposes of this policy, harassment is defined as unwelcome or

unsolicited physical or verbal conduct in the workplace based on age, race, political or religious beliefs, colour, place of origin, ethnic origin, citizenship, gender, mental or physical disability, ancestry, marital status, family status, record of offences, sexual orientation, gender identity, and any grounds prohibited by applicable federal or provincial regulations which has the effect of:

1. interfering with an individual's work performance or results in creating an uncomfortable, intimidating, hostile, or offensive work environment;
2. resulting in a change in some condition or term of employment;
3. denying individual rights and dignity; or
4. harassment which has the above effects and includes, but is not limited to:
 - written or oral abuse, acts or threats of violence, including intimidation and or coercion, offensive actions, insults, derogatory remarks or jokes;
 - offensive cartoons, software, pictures, graffiti, drawings, or printed material;
 - racial or ethnic slurs, name calling, teasing;
 - sexual harassment such as unwanted comments, gestures, touch, or contact of a physical or sexual nature, such as sexual advances, requests for sexual favors, or other unwanted conduct of a sexual nature which is likely to cause offence or for which submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; and
 - any other unwanted or offensive behavior which results in loss of individual rights and dignity.

1.4 Responsibility of Team Leaders

It is the legal and moral responsibility of the Company to provide a harassment free work environment.

It is the responsibility of every Team Leader to:

1. Ensure the workplace is free from harassment by addressing any behavior that may potentially be deemed harassment, regardless of how this behavior is brought to the attention of the Company, and investigate any complaints;
2. Inform all new and existing employees, contractors, suppliers and consultants of Company policy and procedures in dealing with harassment;
3. Treat each complaint in a serious and confidential manner;
4. Support complainants and alleged harassers in dealing with the stress related to harassment, and consider offering Employee Assistance Program (“EAP”) services to assist;
5. Speak out or intervene when witnessing harassment; and
6. Consult with Human Resources, Law, Occupational Health, Corporate Security, EAP, or other resources as appropriate.

Failure to take prompt and appropriate action in the event of a complaint of harassment could result in the Company, its officers and directors, and person or persons involved becoming liable under applicable human rights legislation. As well the individual could be subject to potential internal disciplinary action.

1.5 Responsibility of Individuals

Each individual is responsible to treat co-workers in a way that respects individual differences and demonstrates mutual respect and consideration. An individual who believes he or she has been subjected to harassment should, if they feel comfortable doing so, advise the person or persons responsible that the behavior is unwelcome and ask that it stop. He or she must report the incident to his or her supervisor, Human Resources Manager or representative. If he or she does not feel comfortable with these reporting options, he or she must report the

incident to Open Talk.

An individual who has been asked to stop harassing behavior has the responsibility to stop that behavior immediately, even if they do not consider their behavior to be harassment. Failure to stop the behavior once asked to may result in disciplinary action up to and including termination of employment.

Individuals should keep a written record of the incident including what happened and what their response was, persons involved, dates, times, places and possible witnesses, if any.

An individual who witnesses or is otherwise aware of harassment involving others must report the incident to his or her team leader, Human Resources Manager or representative, Occupational Health, Corporate Security or EAP. If he or she does not feel comfortable with these reporting options, he or she must report the incident to Open Talk. By doing so, individuals can help ensure that the workplace is harassment free.

An individual also has the right to contact the appropriate provincial Human Rights body to file a complaint and if circumstances warrant, a complaint of assault may be filed with the police. Information on filing a complaint can be obtained through the links listed below or by phoning the toll free numbers:

Alberta:

<http://www.albertahumanrights.ab.ca/complaints/>

Toll Free Number 310-0000 and then enter 780-427-7661 (Northern Region) or 403-297-6571 (Southern Region)

British Columbia:

<http://www.bchrt.bc.ca/>

Toll Free Number 1-877-689-8474

Ontario:

<http://www.ohrc.on.ca/english/complaints/index.shtml>

Toll Free Number 1-416-326-9511 (Toronto) or 1-800-387-9080.

1.6 Internal Complaint Procedure

a) Formal Procedure

Individuals are encouraged to seek advice and coaching to resolve harassment as quickly as possible. Advice in responding to harassing behavior can be obtained by contacting either the Team Leader or Human Resources.

1. If harassment continues or if an individual makes a formal complaint, an immediate and confidential investigation will be conducted. The investigation will be conducted by a specially trained person with the Company or a consultant. During the investigation the alleged harasser may be reassigned or suspended temporarily.

Only those individuals who are required to be involved in the investigation will be made aware of the complaint. In all cases where a formal complaint has been received Corporate Security and Law will be advised.

As an investigation can be hampered by hearsay and rumour, all parties are requested to maintain confidentiality and support the investigation process. Upon resolution parties are requested to maintain confidentiality.

2. Complaints of harassment will be investigated immediately. Should unavoidable delays be encountered the complainant will be informed.
3. In all cases the alleged harasser will be informed of a complaint and have an opportunity to respond.
4. The results of the investigation will be communicated to the

complainant and alleged harasser in writing.

5. Disciplinary action, up to and including termination of employment of an employee for cause, will be based on the results of the investigation, the severity of the complaint, and whether the harasser has any incident record related to harassment.
6. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged harasser.
7. If an individual feels his or her complaint is not being handled in a satisfactory manner they are encouraged to contact Human Resources. If he or she does not feel comfortable doing so, he or she may report it to Open Talk.
8. With respect to complaints made against employees of suppliers, contractors, or consultants the Company will choose appropriate action after consulting with the supplier, contractor, or consultant. Such action will be based on the results of the investigation, the severity of the complaint, and whether the harasser has any incident record relating to harassment.

b) Subsequent Action to the Investigation

Within two weeks of the investigation being completed, Human Resources, the investigator, the Team Leader and Law (the "Team") will decide whether on a balance of probabilities there is enough evidence to conclude that harassment occurred. All possible solutions for resolving the situation will be canvassed including the possibility of mediation between the parties. If harassment occurred and as soon as reasonably possible, disciplinary action will be taken, up to and including termination. In addition whether the individuals involved can continue to work in their current area will be reviewed. Corrective action, such as harassment awareness and education sessions, can be useful in improving the work environment and preventing further incidents.

1.7 Protection Against Intimidation or Retaliation

An individual who makes a complaint, gives evidence or assists in any way in an investigation or in resolution of a complaint of harassment will be protected from intimidation or retaliation regardless of the results of the investigation.

Retaliation includes: harassment, demotion, unwanted transfer, denial of opportunities within the Company, or termination that is related to an individual's involvement in the complaint process.

Any attempt at intimidation or retaliation against anyone who reports suspected harassment is a violation of human rights legislation and Company policy and will result in disciplinary action.

1.8 False Complaints

All complaints brought forward will be treated in a serious and respectful manner. Upon full investigation, any complaint deemed deliberately false, malicious or vindictive will be subject to disciplinary action up to and including termination of employment for cause, cancellation of contracts, or any other action as appropriate.

1.9 Zero Tolerance

BP Canada has a policy of zero tolerance. We urge anyone with questions to contact your Team Leader or Human Resources. If you do not feel comfortable doing so, you may contact Open Talk.