



Workplace harassment, misconduct, and violence prevention and management policy

Just For Laughs Group

1. Preamble

At the Just For Laughs Group, we believe that creativity and excellence can only thrive in a respectful and safe work and collaboration environment. We do not tolerate any form of harassment, intimidation, discrimination, or violence by or concerning the members of our team, industry representatives, or any party involved in our activities. This position is not a statement of intention: it is inscribed in our code of ethics, supported by concrete, confidential, and respectful processing mechanisms. We acknowledge our responsibility toward the industry in which we work, and we commit to act rigorously and discerningly when confronted with challenging situations where any party can raise issues.

One of the fundamental goals of Just For Laughs (hereafter the “the Employer”) is to ensure that everyone can thrive in a safe environment where mutual respect prevails.

To achieve these goals, the Employer has established this Workplace harassment, misconduct, and violence prevention and management policy (hereafter the “Policy”). The Policy is an integral part of the measures taken by Just For Laughs under the *Act respecting labour standards* and the *Act respecting occupational health and safety*.

The Policy aims to reaffirm these commitments; prevent, identify, monitor, and eliminate risks of psychological harassment, sexual harassment, discriminatory harassment, and sexual violence; provide a framework for reports and complaints; protect individuals involved; ensure the follow-up of situations brought to the Employer’s attention; and provide for the conservation of documents related to the management of these situations.



2. Purpose and objectives of the Policy

This Policy aims to prevent and put a stop to all forms of harassment and behaviour that can lead to harassment, as well as promote a work environment where everyone is treated with dignity and respect for their psychological and physical integrity.

- Offer and maintain a workplace free of harassment, misconduct, and violence, including when these situations originate from external sources.
- Obtain a commitment from everyone working in the organization to prevent and fight workplace harassment.
- Implement necessary mechanisms for the prevention, reporting, and thorough management of reports and addressing concerning situations.
- Specify the responsibilities of the Employer, resource-persons, managers, employees, and other individuals subject to this Policy.
- Ensure the privacy of complaints, reports, information, and documents received or produced in connection with the management of a situation.

3. Definitions

Employer: Just For Laughs Group

Employee: Includes, subject to the limitations set forth in bylaws:

- Full-time, part-time, and seasonal employees
- Contractors
- Collaborators
- Volunteers
- Interns
- Students
- Members of the Board of Directors
- Industry artists and craftspeople

The definition of “Employee” in the Policy cannot be used as an admission of any kind nor to interpret another policy or law.



Harassment: The *Act respecting labour standards* defines psychological harassment as:

“Any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that affects an employee’s dignity or psychological or physical integrity and that results in a harmful work environment for the employee. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment.”

Psychological harassment: Includes offensive or reprehensible behaviour, comments, gestures, or physical acts that are repeated or, if a single incident, are sufficiently serious to cause an ongoing harmful effect, affect the dignity or integrity, humiliate, intimidate, or harm the well-being of an individual or lead to a harmful work environment.

Sexual harassment: Includes behaviour, words, gestures, contact, advances, solicitations, invitations, or other conduct of a sexual nature that are intrusive, unwanted, or offensive. This can notably include unwanted physical proximity, intimidating postures, comments with a sexual connotation, repeated advances, insistent stares, unsolicited physical contact, retaliation after a refusal, or any sexual conduct that affects an individual’s dignity, integrity, or work environment.

Discriminatory harassment: Includes any instance of discriminatory harassment related to one of the grounds set forth in article 10 of the *Charter of human rights and freedoms*, including race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, previous convictions, language, ethnic or national origin, social condition, disability, or the use of any means to overcome this disability.

Sexual violence: Any form of violence aimed at sexuality or any misconduct of an unwanted sexual nature, whether taking place once or repeatedly, including violence related to sexual or gender diversity.

Misconduct: Any conduct, words, gesture, behaviour, or attitude that is incompatible with the expectations of respect, courtesy, dignity, or safety provided for in this Policy, without this conduct necessarily constituting harassment under the law.

Report: A process by which a person informs the Employer of a concerning situation, inappropriate behaviour, a dangerous dynamic, or a situation that can harm the workplace climate, dignity, psychological safety, or respect of an individual, without necessarily requesting a formal investigation.

Formal complaint: A process by which a person asks their Employer to conduct a formal review of the events they consider to be potential psychological, sexual, or discriminatory harassment, or sexual violence, under this Policy.

Complainant: A person who files a report or makes a formal complaint related to a situation they claim to have experienced personally.



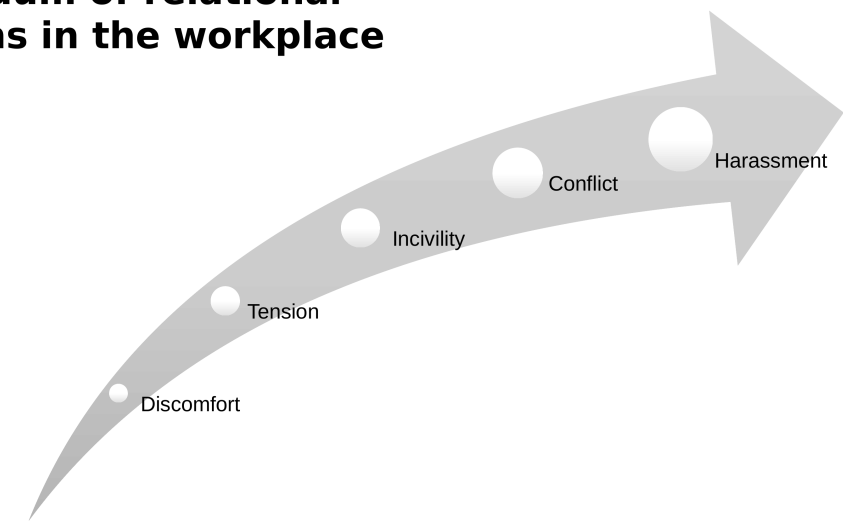
Accused: A person whose behaviour, words, gestures, or actions are the subject of a report or formal complaint.

Witness: A person who files a report or participates in the management of a situation they observed or are aware of, without being the person directly targeted by the alleged behaviour.

Designated person / first-line intake person: A person responsible for receiving and processing reports or complaints of harassment, misconduct, or violence covered by this Policy.

The term “harassment” does not include situations that can be likened to an interpersonal conflict, work-related stress, challenging professional constraints, or the normal exercise of management rights, including attendance management, work organization, performance evaluation, or the application of an administrative or disciplinary measure. However, even when a situation does not constitute harassment in the legal sense, it may require action related to management, prevention, or the workplace climate.

Continuum of relational tensions in the workplace



Prepared by Jarvis Résolution

Interpretation note

This continuum should not be understood as a linear or automatic progression. A situation can intensify, de-escalate, change in nature or move quickly from one category to another depending on the facts, the context, the repetition of the behaviours, their effects and the response provided. The continuum serves as a reference point, not a mechanical grid.



Proposed definitions

Reference points for distinguishing between discomfort, relational difficulty and harassment.

Concept	Definition
Discomfort	A subjective impression of unease, embarrassment or doubt felt by a person in a given situation. The other person is not necessarily aware of it.
Tension	A latent disagreement or relational difficulty that may be felt by the individuals concerned or observed by those around them.
Incivility	Behaviour, words or an attitude lacking respect, courtesy or consideration, without necessarily reaching the threshold of harassment.
Conflict	A situation in which two or more people perceive their interests, needs, expectations or ways of doing things as incompatible. The individuals concerned may, to varying degrees, contribute to the dynamic.
Harassment	Vexatious conduct that is repeated, hostile or unwanted, that affects a person's dignity or integrity and results in a harmful work environment. A single serious incident may also constitute harassment if it produces a lasting harmful effect.



4. Scope of application

4.1 Harassment by any person

The Employer commits to taking reasonable measures adapted to the circumstances to prevent and stop harassment toward its Employees, wherever such harassment originates – including anyone associated with the workplace, whether it be another Employee, a manager, artist, craftsperson, service provider, supplier, consultant, collaborator, business partner, distributor, client, visitor, or event participant.

Similarly, the Employer expects that Employees do not engage in conduct or make statements that could be construed as harassment toward any individual with whom they may come into contact within the course of their employment or during the Employer's activities.

4.2 Scope

The Policy applies to Employees on the premises of the Employer as well as other locations where Employees work during or in connection with their employment, notably:

- Through the use of work tools provided by the Employer, including emails, telephone calls, texts, instant messages, digital platforms, or virtual meetings;
- In common areas, including break rooms, locker areas, cafeterias, courtyards, or shared spaces;
- In any location where the Employee may work during their employment, including training sessions, events, festivals, tours, meetings, travel, or promotional activities.

4.3 Organizational realities and factors to monitor

Just For Laughs operates in an organizational context characterized by highly strategic operational demands, sometimes quick decisions, a culture of collaboration and proximity, as well as the involvement of individuals with various statuses and roles in the workplace, including Employees, managers, artists, craftspeople, suppliers, collaborators, and partners.

These characteristics are not problematic in themselves, but they require particular care to ensure performance demands, rapid execution, friendliness, relationships based on authority or influence, and interactions with third parties remain compatible with the respect, courtesy, dignity, and psychological safety of all involved.



5. Commitments and responsibilities

5.1 Employer commitments

The Employer commits to:

- Not tolerate any form of harassment, misconduct, or violence and distribute this Policy to make it accessible to all parties involved, especially during onboarding and through appropriate internal channels;
- Implement methods and techniques to identify, monitor, and eliminate risks of psychological harassment, sexual harassment, and sexual violence, including by training managers and designated individuals so they can recognize words, actions, gestures, conduct, or situations that may constitute harassment or sexual violence;
- Remain informed, for risk identification, through reports received, complaints, organizational diagnostics, internal surveys, exit interviews, follow-ups with those involved, recurring incidents, particular contexts related to events or work environments, as well as recommendations made by specialized resources;
- Implement informational, awareness, and specific training programs for harassment prevention, including sexual violence, for Employees, managers, and designated individuals;
- Regularly raise awareness of staff on roles and responsibilities related to prevention, notably during social activities or busier, more stressful, or more conflict-prone work periods;
- Consult staff on situations specific to their work environment, notably by planning a time when Employees can discuss potential issues with their manager;
- Encourage Employees to discuss any problem encountered at work each time the Employee feels the need to do so with their manager or designated persons;
- Hold meetings with individuals leaving their employment to understand the reasons for their departure, when appropriate;
- Integrate the Policy into the prevention program or workplace health and safety action plan, when applicable, and ensure its revision at least once per year.



5.2 Role of the Designated person / first-line intake person

The Designated person / first-line intake person ensures that Employees are informed of the Policy, that they understand its core elements, and comply with it.

They commit to:

- regularly raise awareness of harassment prevention among Employees;
- regularly raise awareness of prevention and handling situations of harassment, misconduct, or violence among managers;
- implement or recommend methods or techniques to identify, monitor, or eliminate risks of harassment and sexual violence;
- ensure that the Policy is known, distributed, and accessible to Employees;
- propose to the Employer and implement training sessions, periodic updates, reminders, or exercises for Employees, the Employer, and managers;
- receive complaints or reports and process them as required by the Policy;
- make recommendations to the Employer for actions to avoid or put a stop to any situation of harassment;
- maintain up-to-date knowledge of good practices for the prevention and management of harassment;
- take required action to ensure the confidentiality of a complaint, report, information, or document received in connection to a situation covered by the Policy;
- conserve documents made or obtained in connection with the handling of a situation for a minimum period of two years.

5.3 Role of managers

Managers commit to:

- make Employees aware of everyone's responsibility to maintain a safe workplace free of harassment;
- detect risk factors and potentially problematic situations and determine, by consulting appropriate resources, measures to take to prevent these situations from leading to harassment;
- outline expected behaviours and unacceptable behaviours;
- take any concern brought to your attention seriously, without trivializing the situation or coming to premature conclusions;
- avoid conducting a parallel analysis when a situation could fall under a formal complaint, report, or investigation procedure;



- quickly refer the individual to the resource-person or appropriate resources for the situation;
- preserve the confidentiality of information received and avoid conduct that could be perceived as a form of retaliation, pressure, or discouragement to report a concerning situation.

5.4 Role of Employees

All Employees are responsible for ensuring a safe workplace for themselves and their colleagues.

Employees must:

- contribute to maintaining a workplace free of harassment, misconduct, and violence;
- be aware of their behaviour toward others;
- participate in good faith and honesty in the measures implemented by the Employer to prevent, understand, investigate, or put a stop to harassment;
- take necessary actions to protect their health, safety, or physical or psychological integrity and ensure they do not put the health, safety, or physical or psychological integrity of others in danger – those who are present in or near workspaces – in accordance with the requirements set forth in article 49 of the *Act respecting occupational health and safety*;
- report any situation that constitutes harassment, misconduct, or violence to a designated person as soon as possible.



6. Reports and complaints

Although the *Act respecting labour standards* provides for a maximum period of two years following the last instance of harassment to make a complaint, filing a report or complaint soon after the incident is strongly encouraged in order to ensure prompt action by the Employer and so that Employees can perform their work in a safe workplace.

6.1 Reports

Reporting is a tool for prevention and intervention. A person can file a report when they feel they have been harassed, when they have witnessed harassment, when they become aware of a concerning situation, or when they perceive a situation that could be harmful to the work climate, dignity, psychological safety, or respect of others.

The report may concern a conflict, incivility, persistent feeling of discomfort, inappropriate words or behaviour, a situation likely to escalate to harassment if unaddressed, or any other situation related to the goals of this Policy.

When desired, possible, and safe to do so, the person affected may inform the person engaging in the behaviour that it is unwanted and ask them to stop. This is not mandatory. If such an intervention is not desired or possible, or if the person prefers not to intervene directly, they may bring the situation to the resource person/first-line contact or their manager.

When the manager or resource person/first-line contact is informed of such a situation, they will provide or make a copy of this Policy available and refer the individual to the appropriate mechanism.

Processing a report can provide an initial assessment of the situation and allow for the implementation of preventive, supportive, referral, monitoring, or clarification measures, without necessarily requiring a formal complaint to be filed.



6.2 Alternative resolution methods

The resource person may suggest resolving certain reports using alternative resolution methods, including mediation, when circumstances allow for it. This is a voluntary undertaking that must be preceded by an analysis of the context, risks, power dynamics between those involved, and the nature of the allegations.

6.3 Formal complaint

When a person seeks for the events they believe to be psychological, sexual, or discriminatory harassment, or sexual violence, to be the subject of a formal review, they may file a formal complaint as provided in this Policy.

The formal complaint involves an admissibility review to determine whether the alleged events – assuming the complainant’s account is true at this stage – could constitute harassment, misconduct, or violence under this Policy.

The formal complaint must be submitted as soon as possible following the alleged events or their last instance to enable the Employer to intervene promptly and appropriately. The complainant reserves the right to address CNESST directly within two years following the last instance of the alleged conduct.

The formal complaint is filed by completing and submitting Appendix 1 of this Policy to the Designated person / first-line intake person. When confidentiality or a conflict of interests justifies it, the complaint may be submitted to the substitute of the resource-person. If the request comes from an external party, it may be directed to the first-line contact outside the organization (Jarvis Resolution).

6.4 Admissibility review

The admissibility review is a preliminary procedure determining the sufficient likelihood of the existence of harassment, misconduct, or violence under this Policy. It does not constitute a conclusion on the merits of the complaint.

In this stage, the principal subjects of the review are the complainant’s alleged facts and the information they provide. The question is whether – assuming the alleged facts are true – they could fall under this Policy and warrant an investigation or other responsive action.

When the complaint is deemed inadmissible, the Employer may close the file or determine that the issue or risk should instead be addressed through another mechanism, a management measure, preventive intervention, or workplace culture initiative.

When the complaint is deemed admissible, the Employer determines the appropriate next steps, which may include an internal or external investigation.



6.5 Provisional, preventive, and protective measures

According to the nature of the allegations, the context, and identified risks, the Employer may implement provisional, preventive, or protective measures during the processing of a complaint or report.

These measures are not a conclusion on the merits of the complaint or report nor a disciplinary action for the accused, except when indicated otherwise. They aim to prevent aggravating the situation, protect the individuals involved, and maintain a positive work environment while the file is being processed.

6.6 Processing and investigation

The resource-person or, according to the case, an external front-line contact appointed for this purpose, handles the complaint promptly and privately taking into account the nature of the allegations.

If the complaint is deemed admissible, an investigation may be carried out by the resource-person/ front-line contact or by an external investigator appointed for this purpose. Any investigation is carried out impartially, thoroughly, and respecting the rights of the individuals concerned.

The investigation will determine whether the complaint is founded or unfounded, in whole or in part, and whether the allegations constitute acts of harassment, misconduct, or violence under this Policy.

Any investigation report is strictly confidential and not provided to parties involved in the complaint, subject to applicable legal obligations.

Following an investigation, the complainant and the accused meet with the resource-person to inform them of the relevant conclusions, in accordance with privacy obligations.

6.7 Further measures

Following the processing of a report or complaint, the Employer determines the appropriate actions according to the conclusions, nature of the situation, applicable obligations, and any specific needs.



6.7 Reports and complaints procedure

In the case of a report, please submit it in a clear and detailed email to one of the email addresses below provided for internal and external parties.

A formal complaint is submitted by completing and submitting Appendix 1, also sent to one of the emails below provided for internal and external parties.

Internal reports or complaints

Please submit your report or complaint to signalements@hahaha.com

These are processed by:

- Human Resources Department (Designated person)

In cases of conflict of interest or if HR is unable to receive a report or complaint, the organization has designated a substitute:

- Legal Affairs Department

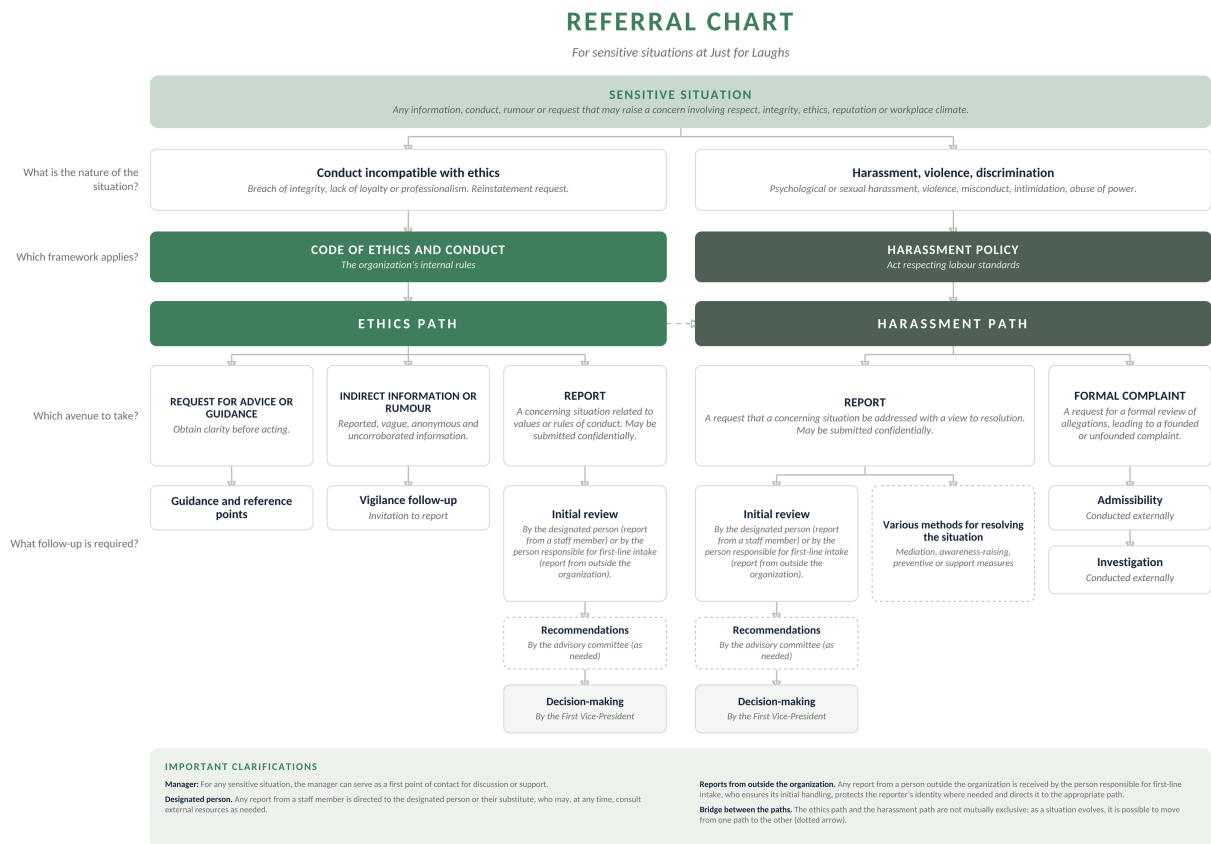
External reports or complaints

A report or complaint made by an external party will be systematically received by an external first-line intake person: Jarvis Resolution. These reports or complaints will be processed with the required respect and confidentiality.

Please submit your report or complaint to confidentiel@hahaha.com



6.8 Decision-making chart – sensitive situation management



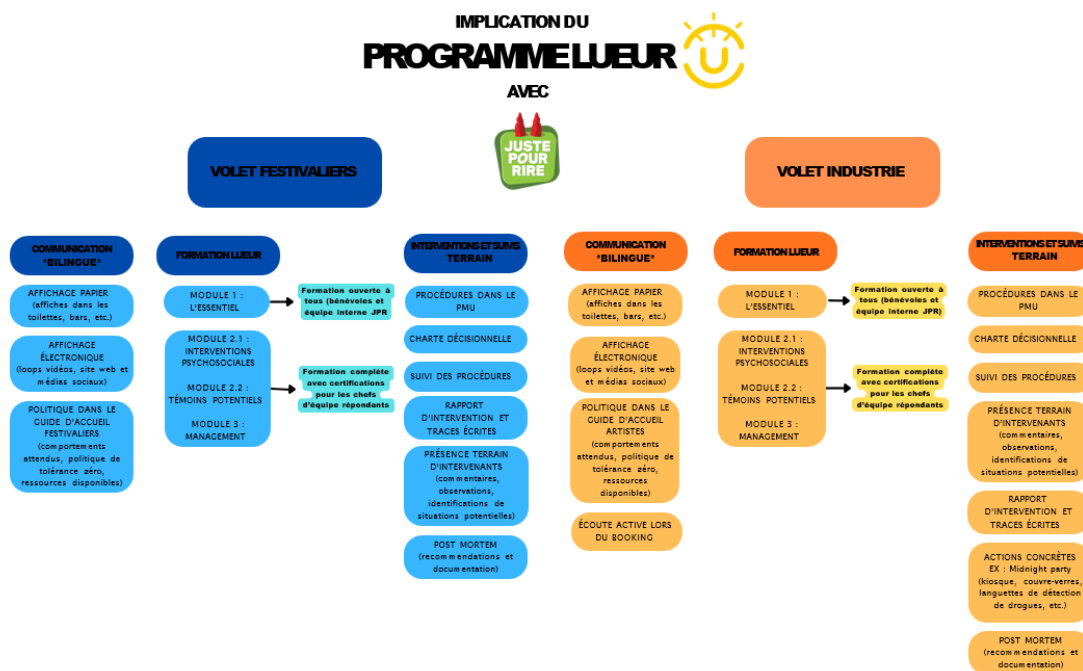
Prepared by Jany's Résolution

6.9 Collaboration with the Lueur program

Our organization also works with the Lueur program, which establishes measures to ensure the safety of our festival-goers (as well as industry members) and prevent all forms of harassment and sexual exploitation during our events. This partnership also enables several representatives of the organization to participate in Lueur program training sessions, promoting the implementation of pertinent tools in our operations as well as developing concrete internal expertise and know-how reaching the highest standards in harassment prevention.



Below we provide an example of concrete elements of initiatives carried out with the Lueur program:





7. No retaliation and frivolous or false allegations

No retaliation measure may be imposed on a person who, in good faith, filed a report or complaint, provided information, witnessed a situation, assisted in a review, participated in an investigation, or raised a concern under this Policy.

Equally, any Employee found to have made frivolous or false allegations with a harmful or abusive intent or in bad faith may face administrative or disciplinary measures up to dismissal.

8. Disciplinary and administrative measures

The Employer will take all necessary measures to put a stop to a situation of harassment, misconduct, or violence brought to its attention. These measures may include and are not limited to: change of assignment, last-chance agreement, training or sensitivity requirements, request for apology, pledge not to reoffend, management intervention, administrative measure, or a disciplinary measure up to dismissal.

Disciplinary or administrative measures are confidential. The Employer and designated persons do not divulge the nature of sanctions imposed on other Employees.

9. Legal framework

- *Quebec charter of human rights and freedoms*
- *Civil code of Québec*
- *Act respecting labour standards*
- *Act respecting occupational health and safety*
- *Act respecting industrial accidents and occupational diseases*

10. Revision

This Policy will be revised at least once per year or as needed, and any amendment will be communicated with staff.

The annual revision takes into account reports, complaints, prevention reports, social activities related to work, organizational changes, psychosocial risks, and risks of sexual violence observed in the area.



Appendix 1: Complaint form

IMPORTANT INFORMATION TO REVIEW BEFORE COMPLETING THIS FORM

This form allows you to file a formal complaint under the *JPR Workplace harassment, misconduct, and violence prevention and management policy*.

You have a time limit of **two (2) years** following the most recent instance of the alleged conduct to file a complaint. You may also, at any time and regardless of this form, directly contact **CNESST** (cnesst.gouv.qc.ca) or the **Commission des droits de la personne et des droits de la jeunesse (CDPDJ)**.

The submission of the complaint is **confidential**. No retaliation may be taken against you as a result of this action.

COMPLAINANT INFORMATION

Name: _____ Telephone: _____

Role: _____ Workplace: _____

Preferred email for communications related to this complaint: _____

Information of the individual(s) accused

Name: _____ Role: _____

Name: _____ Role: _____

Name: _____ Role: _____

1. What happened?

(Describe the alleged facts, words spoken, and actions, specifying what happened beforehand, during, and after each reported event.)



2. When?

(Specify the dates and circumstances surrounding the reported events.)

3. Place and witness(es)

(Specify the location where the event took place and identify the individuals present, if applicable.)

Is this the first event? Yes ☐ No ☐

If not, how frequently does this occur?

What are the dates of these events?

4. Actions and expectations

How have you attempted to resolve the situation?

What are your expectations following the submission of this complaint?

Do you have supporting documents for your complaint? Yes ☐ No ☐

(Attach these documents, if applicable.)



Other useful information to share

DECLARATION

The statements made in this form are true and to the best of my knowledge.

Date: _____

Employee name: _____

Signature: _____

Send the completed document, by confidential mail or email, to the resource-person.

A confirmation of receipt will be sent to you within five (5) business days.



Appendix 2: Tools available through CNESST

- [Harassment in the workplace | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Preventing harassment and intervening | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Psychosocial risks related to the workplace | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Preventive monitoring tool – How to prevent and manage psychological or sexual harassment in the workplace](#)

Training and webinars

- [Webinar – Demystifying psychological and sexual harassment in the workplace](#) (available on demand)
- [Online training on labour standards](#) : module on psychological and sexual harassment and an explanation of the complaint process with CNESST

Info sheets and videos

- [Examples of workplace harassment situations](#)
- [Mediation: a service for quick and amicable conflict resolution](#)
- [Psychological or sexual workplace harassment - Our expert's guidance](#)

Publications

- [Checklist – Workplace harassment | Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST \(gouv.qc.ca\)](#)
- [Understanding and preventing psychological and sexual harassment in the workplace – Practical guide for employers](#)
- [Psychological and sexual harassment – let's talk about it!](#)



Appendix 3: Other available resources

Resource	Type of support/access	Contact
Association québécoise Plaidoyer-Victimes	Resources and information for victims	Website: aqpv.ca/ressources/
Local social services – Greater Montréal	Referrals to nearby social and community services	Website: www.211qc.ca/ Telephone: 211
Info-Social 811	Psychosocial telephone counselling service	Telephone: 811
L'Aparté – Resources against harassment and violence in cultural settings	Specialized resource for cultural settings	Website: aparte.juripop.org/
Directorate of Criminal and Penal Prosecutions (DPCP) and the Quebec Ministry of Justice	“Support for victims of crime” section and legal information related to recourses	Support for victims of crime: https://www.quebec.ca/en/justice-and-civil-status/support-victims-crime DPCP info line for domestic and sexual violence: 1-877 547-DPCP (3727) Opening hours: business days, Monday to Friday, 8:30 a.m. to 12:00 p.m. and 1:00 p.m. to 4:30 p.m.
Quebec Bar Association – Rebâtir	Free legal counselling for victims of sexual and domestic violence (up to 4 hours)	Website: rebatir.ca/ Telephone: 1 833 REBATIR Email: projet@rebatir.ca
Virtual training and information on harassment in cultural settings	Information and expert advice created by the INIS and the Gouvernement du Québec	Website: https://unefoisdetrop.ca