

DIVERSITY, VIOLENCE, DISCRIMINATION AND HARASSMENT POLICY

[Fund Manager] (the “**Fund Manager**”) is committed to providing a safe and respectful working environment in which all individuals with whom we interact on behalf of the firm, are free from workplace violence and harassment.

As such, we have adopted this policy, which is primarily based on the following series of principles:

- respect for individuals’ physical and psychological integrity;
- respect for individuals’ dignity and privacy;
- the right of individuals to enjoy fair and reasonable working conditions that do not endanger their health or safety; and
- the right to be treated equally, without discrimination or harassment.

Scope

This policy protects “**Collaborators**” in the “**Workplace**”.

Collaborators include:

- all managers, team members, contributors and other employees and contractors of the Fund Manager (collectively, “**Fund Representatives**”);
- all entrepreneurs, founders, employees, contractors and representatives of portfolio companies or prospective portfolio companies;
- all employees and representatives of our investors and prospective investors; and
- all other start-up community members and anyone with whom we interact on behalf of the Fund Manager.

The Workplace includes:

- our offices and other locations where our work is performed; and
- all other locations in which the Fund Manager conducts its business and other activities, including, but not limited to, conferences, forums and social events.

Diversity and Non-Discrimination Commitment

We provide equal opportunities to all qualified Collaborators and do not discriminate against Collaborators because of age, sex (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), race, colour, sexual orientation, religion, creed, political belief, record of offences, place of origin, ancestry, ethnic origin, citizenship, marital

status, family status, gender identity, gender expression, disability, source of income or any other ground protected by law.

This applies, consistent with applicable law, to all aspects of the Fund Manager's interactions with Collaborators, including recruitment, investment, divesture, promotion, training, transfer, discipline, termination, compensation, benefits and participation in all activities, events and programs sponsored by the Fund Manager. All Fund Representatives must follow this policy in dealing with all applicants, co-workers, customers, clients, visitors, entrepreneurs, founders, employees, contractors and representatives of portfolio companies, prospective portfolio companies, investors and prospective investors.

The Fund Manager has an accommodation and accessibility process in place and provides accommodations for Collaborators with disabilities in accordance with applicable legislation. If a Collaborator requires a specific accommodation because of a disability or other reason, please reach out to the [e.g. **Chief Financial Officer, senior officer in charge of operations or senior partner**], or his or her designate (the "**Designated Official**").

Safe Workplace Commitment

The Fund Manager will take whatever steps are reasonable to prevent harassment with respect to Collaborators and to protect Collaborators from violence in the Workplace from any source, be it from other Collaborators, service providers (i.e. delivery or maintenance personnel) or strangers.

The Fund Manager will not tolerate harassment or violence towards Collaborators in the Workplace from any source. All Fund Representatives are responsible for complying with this policy and working together to prevent violence and harassment in the Workplace. Failure by any Fund Representative to comply with this policy may lead to discipline, up to and including termination of employment (or the relationship) for just cause or serious reason.

The Fund Manager will ensure that there is a Designated Official appointed at all times and that the identity, role and contact information of the Designated Official will be communicated and available to all Fund Representatives.

Harassment and Violence in the Workplace

"**Workplace Harassment**" means engaging in a course of vexatious comment or conduct against a Collaborator in a Workplace that is known, or ought reasonably to be known, to be unwelcome. Workplace Harassment includes, but is not limited to, sexual harassment, psychological harassment and harassment based on age, sex, race, colour, sexual orientation, religion, creed, political belief, record of offences, place of origin, ancestry, ethnic origin, citizenship, marital status, family status, gender identity, gender expression, disability, source of income or any other ground protected by law. A poisoned or hostile working environment is also a form of Workplace Harassment and prohibited by law.

Workplace Harassment includes many forms of behaviour, such as:

- insulting, intimidating, demeaning, annoying, embarrassing or otherwise offensive behaviour;
- inappropriate or unwelcome focus or comments on a person's physical characteristics or appearance;

- bullying and cyberbullying;
- isolation and shunning, gossip, rumours, negative blogging, insults, name-calling;
- slamming doors, throwing objects and physical contact;
- Workplace Sexual Harassment (defined below); and
- any other psychological harassment that affects an individual's dignity or psychological or physical integrity.

Workplace Harassment does not include legitimate, reasonable management actions that are part of the normal work function, including but not limited to:

- measures to correct performance deficiencies, such as placing someone on a performance improvement plan;
- imposing discipline for workplace infractions;
- requesting medical documents in support of an absence from work where legally permitted; and
- enforcement of Workplace rules and policies.

“Workplace Sexual Harassment” means engaging in a course of vexatious comment or conduct against a Collaborator in the Workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the Collaborator and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace Sexual Harassment may include, and is not limited to:

- unwelcome sexual advances;
- requests for sexual favours;
- other verbal or physical conduct of a sexual nature including sexual jokes, graphic spoken commentary about a person's body, derogatory or degrading remarks, leering, whistling, unwanted touching, hugging, kissing, tickling, pinching, patting, assault;
- enquiries or comments about an individual's sex life; and
- displaying sexually offensive material in the Workplace.

“Workplace Violence” means the attempted or actual exercise of physical force against a Collaborator in the Workplace that causes or is likely to cause physical injury to the Collaborator; or, a statement or behaviour that it is reasonable for a Collaborator to interpret as a threat to exercise physical force against the Collaborator in a Workplace that could cause physical injury to the Collaborator. Workplace Violence includes domestic violence that occurs in the Workplace.

Workplace Violence includes, but is not limited to:

- hitting, punching, slapping or other means of assaulting another person;
- challenging another person to a fight;
- engaging in dangerous, threatening or unwelcome horseplay;
- bringing a knife or other weapon of any kind onto our property including parking lots or other exterior premises;
- threatening harm through words, gestures, symbols or written materials; and
- stalking or other intimidating behaviour.

Responsibilities

The Fund Manager is committed to maintaining a professional and respectful working environment. The Fund Manager will ensure this policy and the supporting program are implemented and maintained and that all Fund Representatives have the appropriate information and instruction to protect themselves and other Collaborators from Workplace Violence and Workplace Harassment.

All Fund Representatives are responsible for working in compliance with this policy and the supporting program to support an atmosphere of trust, mutual respect and safety. All Collaborators are strongly encouraged to report any concerns about Workplace Violence or Workplace Harassment in the Workplace and must immediately, after removing themselves from the situation (if possible), report any incidents of Workplace Violence. There will be no negative consequences for complaints of Workplace Violence or Workplace Harassment made in good faith. Retaliatory action against a Collaborator reporting a situation in good faith and/or participating in an investigation will not be tolerated and any retaliatory conduct should be reported immediately.

Managers and supervisors of the Fund Manager are responsible for following this policy and the supporting program. They are also responsible for ensuring that measures and procedures developed to implement this policy are followed by all Fund Representatives and that Fund Representatives have the information they need to protect themselves. Management will comply with reporting, investigation and documenting procedures and investigate and deal with all concerns, complaints or incidents of Workplace Violence or Workplace Harassment in a fair and timely manner while respecting Collaborators' privacy as much as possible.

Fund Representatives who engage in Workplace Violence or Workplace Harassment, including Workplace Sexual Harassment, may be subject to disciplinary action, up to and including termination of employment (or the relationship) for just cause or serious reason.

Procedures

Minimizing the Risk of Workplace Violence

The Fund Manager will take all reasonable and practical steps to prevent violence in the Workplace including conducting a risk assessment in order to identify possible sources of violence and implementing a violence prevention program in order to eliminate or minimize the risk of violence.

Training and Education

In furtherance of the commitment of the Fund Manager to prevent Workplace Violence and Workplace Harassment, the Fund Manager will provide information and instructional training to all new and existing Fund Representatives. Training is mandatory and attendance will be taken. Training will be conducted in accordance with applicable laws.

Summoning Immediate Assistance in the Event of a Violent Incident

If an incident of Workplace Violence occurs, Collaborators should remove themselves from the situation (if possible). The first priority is to make the Workplace safe, and then to notify relevant internal and external authorities, including calling the police (911) if necessary.

Reporting and Investigation

The Fund Manager will investigate all incidents and complaints of Workplace Violence and Workplace Harassment in an objective and timely manner, take any necessary action to respond to those incidents and complaints, and provide reasonable support victims of Workplace Violence and Workplace Harassment.

In response to an incident or complaint of Workplace Violence or Workplace Harassment:

1. Wherever possible, and if he or she is comfortable doing so, a Collaborator who is a victim of Workplace Harassment may make it known to the harasser, in clear terms, that the comments made or the conduct displayed are unwelcome and will not be tolerated.
2. Any Fund Representatives alleging Workplace Violence or Workplace Harassment should make a complaint to their manager, or, if their manager is the source of the problem or reports to the person who is the source of the problem, to the next level of management, or to the Designated Official.
3. Collaborators who are not Fund Representatives alleging Workplace Violence or Workplace Harassment should make a complaint directly to Designated Official.
4. Collaborators can report incidents or complaints of Workplace Violence or Workplace Harassment verbally or in writing. The Collaborator reporting the incident or the person receiving the complaint should record the following information:
 - (a) Name(s) of the Collaborator who has allegedly experienced Workplace Violence or Workplace Harassment and contact information.
 - (b) Name(s), position(s) and contact information (if known) of the persons involved in the incident.
 - (c) Names of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information (if known).
 - (d) Details of what happened including date(s), frequency and location(s) of the alleged incident(s).

- (e) Any supporting documents the Collaborator may have in his/her possession that are relevant to the complaint.
 - (f) Any documents a witness, another person or the alleged harasser may have in their possession that are relevant to the complaint.
5. The person who receives the complaint will advise the Designated Official who will determine the method of investigation or action required to resolve the issue including, the method of investigation and/or resolution. Investigation and resolution may include participation by a neutral person or resource, such as an independent third party investigator.

However, if the complaint presents a conflict of interest for the Designated Official, which is deemed to include any situation where the complaint involves an allegation of Workplace Violence or Workplace Harassment against a senior partner of the Fund Manager or a person in a more senior management role than the Designated Official, then the Designated Official shall appoint an independent third party investigator.

6. The formality and scope of the investigation will be determined by the specific circumstances of each complaint. The person conducting the investigation will at all times act in a diligent, fair and unbiased manner in respect of any investigation into incidents and complaints of Workplace Violence or Workplace Harassment and in the performance of their duties as described in this policy. The person conducting the investigation will at minimum, complete the following:
- (a) Interview the Collaborator who allegedly experienced the Workplace Violence or Workplace Harassment and the individual(s) allegedly engaging in the Workplace Violence or Harassment, if they are Fund Representatives. Reasonable efforts will be made to interview individuals who are not Fund Representatives.
 - (b) Give the individual(s) allegedly engaging in the Workplace Violence or Workplace Harassment the opportunity to respond to the specific allegations raised by the Collaborator.
 - (c) Interview any relevant witnesses who are Fund Representatives. Reasonable efforts will be made to interview individuals who are not Fund Representatives.
 - (d) Collect and review any relevant documents.
 - (e) Take appropriate notes and statements during interviews.
 - (f) Prepare a written report summarizing the steps taken during the investigation, the complaint, the allegations, the response, the evidence of any witnesses, and the evidence gathered. The report will set out findings of fact and come to a conclusion about whether Workplace Violence or Workplace Harassment was found or not and shall be delivered to an appropriate member of the Fund Manager who is not in a conflict of interest (the “Decision Maker”) in order for the Decision Maker to decide upon and implement any corrective actions.
7. The Collaborator who has allegedly experienced Workplace Violence or Workplace Harassment and the individual(s) allegedly engaging in the Workplace Violence or

Workplace Harassment, if he or she is a Fund Representative, will be informed in writing of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation within ten days of the investigation being completed.

Record-Keeping

The Designated Official will maintain a record of the investigation including:

- (a) a copy of the complaint or details about the incident;
- (b) a record of the investigation including notes;
- (c) a copy of the investigation report;
- (d) a summary of the results of the investigation that was provided to the Collaborator who allegedly experienced the Workplace Violence or Workplace Harassment and the individual(s) allegedly engaging in Workplace Violence or Workplace Harassment, if he or she is a Fund Representative; and
- (e) a copy of any corrective action taken.

Such records will be kept for at least two years following the conclusion of the investigation.

Confidentiality

The investigation of each complaint will be handled in as confidential a manner as possible. While the investigation is ongoing, the person who experienced the alleged Workplace Violence or Workplace Harassment, the individual(s) allegedly engaging in the Workplace Violence or Workplace Harassment, and any witnesses will be instructed not to discuss the complaint, incident or the investigation with other Collaborators or witnesses unless necessary to obtain advice about their rights.

Information obtained about an incident or complaint of Workplace Violence or Workplace Harassment, including identifying information about any persons involved, will not be disclosed unless the disclosure is necessary for the purposes of conducting a full and fair investigation or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

All records of the investigation will be kept confidential.

[Individual representing highest level of management at Fund Manager]