



2016

Placentia Bay Atlantic Salmon Aquaculture Project Women's Employment Plan



Grieg Newfoundland Salmon Ltd.

Marystown, Newfoundland

8/19/2016

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1.0 Introduction

Demand for quality seafood is increasing as is the concern over food security. Newfoundland, as an island, is very much dependent on food importation and as such, risks food shortages should there ever be a disruption in either supply from mainland North America or with current transportation methods such as ferries and roads. As well, there are global concerns with regard to supplies for fresh quality seafood. However, Newfoundland has tremendous resources available that are currently being underutilized that could not only help alleviate concerns with food security but also assist with the increasing demand for high quality seafood products in North America and potentially even globally.

Grieg Newfoundland Salmon Ltd. (GNS) realizes this potential for Newfoundland and is pursuing a state-of-the-art Recirculating Aquaculture System (RAS) for culturing triploid Atlantic salmon (*Salmo salar*) smolt in Marystown, Newfoundland and Labrador (NL) with on-growing marine cage sites in Placentia Bay, NL, and processing into high end quality salmon fillets and other speciality products at a facility in St. Lawrence, NL (Figure 1).

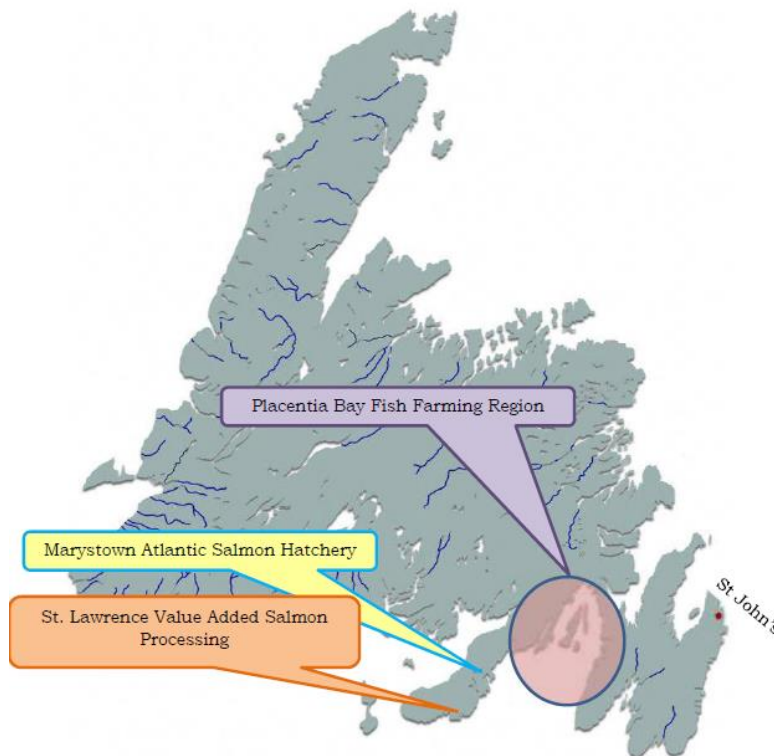


Figure 1: Location in Placentia Bay Newfoundland of Grieg Newfoundland Salmon Ltd. operations

Grieg Newfoundland Salmon Ltd. (the holding company in Newfoundland for Grieg Newfoundland AS of Norway (Grieg Holding AS 40%, Kvasshøgdi AS 40%, and Ocean Choice International (OCI) 20%)) has three subsidiary companies, Grieg NL Nurseries Ltd. is the land based hatchery operations, Grieg NL Seafarms is the marine based sea cage site and Grieg NL Development Ltd (Figure 2). The Grieg group of companies are one of the world’s leading fish farming enterprises specializing in Atlantic salmon, with operations in Norway, British Columbia and Shetland, UK. GNS’s focus is on sustainable use of resources while achieving profitable growth.

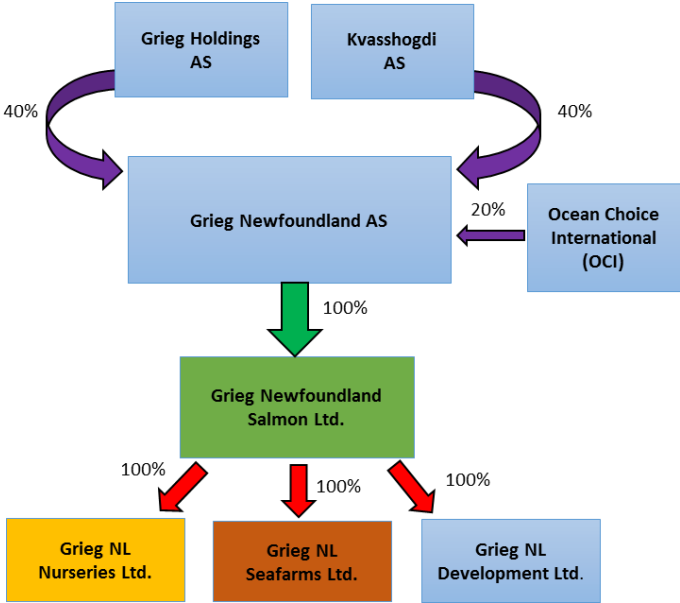


Figure 2: Corporate Structure of the Grieg Group of Companies

This project has strong potential in terms of export market opportunities and economic benefit, especially in outport Newfoundland. An operation of this size will provide very significant employment opportunities, resulting in a much needed major boost to the current economy of NL and providing prospects for graduates to utilize their skills and knowledge in their home province. Newfoundland is world renowned for some of its training facilities and the graduates that it produces. The Fisheries and Marine Institute of Memorial University is one such training facility that GNS has already utilized for recruiting skilled employees and will continue to utilize this and other training facilities in the province for its workforce.

The proposed Project was registered for Environmental Assessment (EA) review under the Newfoundland and Labrador *Environmental Protection Act (NL EPA, Part 10)* in February 2016. Following governmental and public review of the EA Registration, the Minister of Environment and Conservation announced on July 22, 2016 that the Project had been released from the EA review process, subject to a number of associated terms and conditions. These included the following:

Prior to the commencement of construction activities, the proponent must submit a Women's Employment Plan for the project to the Women's Policy Office that meets the approval of the Deputy Minister.

The preparation and submission of this document is intended to address the above noted condition of EA release for the Project.

This Plan provides an overview of the various measures that GNS will take to help ensure the involvement of a diverse and inclusive workforce during the implementation phase of the Project. This includes measures to enhance and maintain the participation of women in the Project during its various phases.

1.1 Project Workforce and Schedule

The subsidiaries of GNS will be Grieg NL Nurseries Ltd., a land based hatchery and nursery and Grieg NL Seafarms Ltd., a marine based sea cage grow out site. Each of these subsidiaries will be structured with a senior management team overseeing staff.

Construction of the land based hatchery and nursery is slated to begin in the Fall of 2016 and continue in phases through 2021. At its peak construction period in 2017-2018, it is estimated that upwards of 200 persons will be working on project-related construction activities. Once the land based hatchery and nursery facility is fully operational by 2018, an estimated 36 employees will be working there in permanent, year-round positions. (Table 1).

GNS will also have four marine based areas for continued grow out of the salmon to market size. Once full production is reached in 2021 and all four marine areas are in use, it is expected that 137 employees will be working at these marine sites in Placentia Bay (Table 1).

Table 1: Estimated Full Time (FT) and Part Time (PT) employees required for GNS Land Based and Marine Based Construction and Operations, 2016-2022

Occupation	NOC Code (2011)	FT/PT	Max # of Positions	GNS or Contractors (CT)	Years Required
LAND BASED HATCHERY AND NURSERY PHASE					
Construction Phase					
Engineering Manager	0211	FT	3	CT	2016-2021
Civil Engineers	2131	FT	2	CT	2016-2021
Civil Engineering Technologists	2231	FT	2	CT	2016-2021
Drafting Technologists/Technicians	2253	FT	1	CT	2016-2021
Land Survey Technologists/Technicians	2254	FT	1	CT	2016-2021
Construction Inspector	2264	FT	4	CT	2016-2021
Electrical Power Line and Cable Workers	7244	FT	5	CT	2016-2021
Telecommunication Line and Cable Workers	7245	FT	5	CT	2016-2021
Steamfitters, Pipefitters and Sprinkler System Installers	7252	FT	20	CT	2016-2021
Welder	7237	FT	10	CT	2016-2021
Carpenters	7271	FT	20	CT	2016-2021
Concrete Finisher	7282	FT	20	CT	2016-2021
Heavy Equipment Mechanics	7312	FT	4	CT	2016-2021
Crane Operators	7371	FT	2	CT	2016-2021
Truck Drivers	7511	FT	5	CT	2016-2021
Heavy Equipment Operators	7521	FT	4	CT	2016-2021
Construction Labourers	7611	FT	92	CT	2016-2021
TOTAL			200		
Operational Phase					
Senior Management	0016	FT	1	GNS	2016-
Maintenance Manager	0714	FT	1	GNS	2016-
Production Manager	0911	FT	1	GNS	2016-
Aquaculture Managers	0823	FT	7	GNS	2016-
Aquaculture Technicians	2221	FT	16	GNS	2017-
Aquaculture Technicians	2221	PT	6	GNS	2017-
Welder	7237	FT	1	GNS	2017-
Heavy Equipment Operators	7521	FT	1	GNS	2017-
Air Conditioning Mechanic	7313	FT	1	GNS	2017-
Power Systems Electrician	7202	FT	1	GNS	2017-
TOTAL			36		

Occupation	NOC Code (2011)	FT/PT	Max # of Positions	GNS or Contractors (CT)	Years Required
MARINE BASED SEA CAGE PHASE					
Installation Phase					
Captains	8261	FT	1	CT	2017
Engineering	0211	FT	1	CT	2017
Deck Hands	8441	FT	6	CT	2017
Electrical Industrial	7242	FT	1	CT	2017
Welder Operator	7237	FT	1	CT	2017
Heavy Equipment Mechanic	7312	FT	1	CT	2017-
Crane Operator	7371	FT	1	CT	2017-
TOTAL			12		
Operational Phase					
Senior Managers	0016	FT	2	GNS	2016-
Supervisor General Officer	1211	FT	1	GNS	2016-
Supervisor Financial	1212	FT	1	GNS	2016-
Human Resources Officer	1223	FT	1	GNS	2016-
Administrative Assistant	1241	FT	1	GNS	2016-
Maintenance Manager	0714	FT	1	GNS	2016-
Production Manager	0911	FT	1	GNS	2016-
Aquaculture Managers	0823	FT	7	GNS	2016-
Aquaculture Technicians	2221	FT	33	GNS	2017-
Crane Operator	7371	FT	2	CT	2017-
Captains	8261	FT	16	GNS & CT	2017-
Deck Hands	8441	FT & PT	36	GNS & CT	2017-
Welder	7237	FT	1	CT	2017-
Heavy Equipment Mechanics	7312	FT	6	CT	2017-
Power Systems Electrician	7202	FT	3	GNS	2017-
Aquaculture Labourers	8613	FT & PT	25	GNS	2017-
TOTAL			137		

A lumpfish hatchery is also planned to be used as a cleaner fish in the cages with the salmon as a natural means of controlling sea lice infestations. It is expected that by 2017 the lumpfish hatchery will be employing 10 individuals (not employed directly by GNS).

In 2019, the first salmon are expected to be harvested and subsequent years will see an increase in processing needs as all four marine sites are harvested. By 2022, it is expected that 426 individuals will be working in the NL seafood processing will be involved in the processing and services needed to bring GNS Atlantic salmon products to market.

1.2 Employment Diversity Principles and Commitments

GNS is committed to diversity in the workplace and believes strongly in non-discrimination with a focus on personnel that are committed, dedicated and knowledgeable in their area of expertise or have a strong willingness to learn and grow. It is these qualities that GNS intends to pursue to build a team that will continue to support the Grieg group of companies values and principles. GNS recognizes that diversity in the workplace promotes not only different perspectives but also opinions that can in turn provide varying approaches and solutions and therefore will be embracing such diversity in its workforce.

GNS has developed this Women's Employment Plan (WEP) for Grieg Newfoundland Salmon Ltd. and its subsidiary companies. This plan is intended to encourage a proactive approach toward a workplace environment with policies and practices that promote moral fairness and provide a work environment free from harassment and discrimination. Although traditionally male-dominated, aquaculture and other marine related careers have in recent years seen an increase in women in these non-traditional roles. This is reflected in the current workforce of GNS, with seven employees, four of whom are women (thereby representing 57% of the current workforce). GNS recognizes that talent is not gender specific, and as such will promote a workplace culture that is supportive of women in order to attract and retain talented individuals that can contribute to the success of GNS.

GNS expects all its employees to support this WEP by actively discouraging any behaviour or language that can be considered gender insensitive or not respectful of others. In addition, all managers of GNS will be expected to ensure that staff are aware of equality in the workplace, participate in any training programs offered by GNS to increase awareness of gender sensitivity and contend in a timely and appropriate manner with any personnel that exhibits gender insensitive behaviour.

GNS has developed a number of strategies and initiatives to aid in reaching our goal of an inclusive and reflective workforce. Striking a balance between merit and equality is paramount for our organization. Establishing the proper framework for gender equality will be met through the following responsibilities and beliefs by senior management in our planning and our operations:

- Senior management is committed to gender equality
- GNS has sufficient resources and knowledgeable personnel, along with a positive atmosphere that will promote gender equality
- There are accountability frameworks which ensure that the gender equality policy is implemented

- Gender equality is treated as an objective in and of itself
- Gender equality is recognized as relevant to every aspect of operations
- Gender analysis is integrated into Project planning
- Methods are identified to ensure there is broad participation of women and men as decision makers in the planning process, and
- Clear, measurable, and achievable gender equality results are developed in the earliest phases of the process

2.0 Community and Communication

GNS is prepared to learn from other organizations within the aquaculture industry and other sectors, in order to establish, implement and maintain a positive approach to employment diversification. GNS is committed to working with the community as well as the public sector, government agencies, various women's groups such as the Newfoundland and Labrador Organization for Women Entrepreneurs (NLOWE), Provincial Advisory Council on the Status of Women, Women Interested in Successful Employment (WISE), Women in Resource Development Corporation, Women in Science and Engineering Newfoundland and Labrador, the NL Department of Advanced Education, Skills and Labour and educational institutions such as the Fisheries and Marine Institute to maximize opportunities for women.

2.1 Community

GNS is committed to supporting local communities, particularly with regard to employment opportunities for women. Specifically, GNS will:

- Work with education and training institutions and relevant industry and stakeholder organizations to generate overall awareness of job opportunities associated with the Project and the necessary skills required.
- Participate in information sessions at the community level, with the assistance of government and non-government stakeholders, which are responsive to women needs.
- Provide associated career information to guidance counsellors in secondary school systems.
- Provide support for Women's Job Information Workshops.
- Incorporate gender based analysis information gathered from external stakeholders into the company's policy and workplace design decisions.

- Link with and provide support to women’s organizations / networks, which support the employment of women.
- Meet with community groups and women’s organizations to review existing and potential women’s employment initiatives and strategies.
- Profile female employees working in non-traditional occupations in internal and external company communications material.
- Continue to develop and maintain a corporate culture and work environment within the company that facilitates the achievement of the career goals of women, and provides them with the training and support they need to help them meet their goals and the corporation's business objectives. This includes continuing to offer assistance programs and mentorship to provide employees with an opportunity to enhance knowledge and skills relevant to their work and to advance within the organization according to their goals and aspirations.

2.2 Communication

GNS is taking a hands-on approach to encourage women’s participation in non-traditional roles, it also recognizes that in order to significantly affect women’s employment levels, industry and government organizations will have to work together to promote a positive message. This message should outline the advantages of gender diversity in the workplace in addition to referencing the current levels of employment by women in the various trade and professional occupations.

To support gender diversity at the local level, as outlined throughout the Women’s Employment Plan, GNS will develop and utilize the following tools as part of its own communications strategy.

- GNS will provide women’s organizations with Project information to ensure members of key target audiences are informed of available employment and business opportunities. The company will also support successful contractors and subcontractors to provide timely employment information to relevant stakeholder organizations.
- Working with stakeholder organizations to provide information and assistance to help ensure that women and other members of underrepresented groups understand the job application process, including the role of contractors and unions, and how to register and apply for Project-related positions.

- The use of appropriate language and imagery in all job ads and other communications to encourage women to apply for job opportunities. A gender equity and diversity statement will be included in any such promotional materials related to the development of the Project.
- Any Project-related promotional and communications materials will use positive images and articles / profiles regarding the involvement of women in working on the Project and in the aquaculture industry as a whole.
- GNS will include statements in Project-related tender documents to inform potential contractors of their obligation to assist with maximizing the involvement of women and in reporting the results of efforts and outcomes with regard to their employment.
- Working with high schools and post secondary institutions in the area to promote the aquaculture industry as a viable career for young women considering post-secondary education options.
- Reinforcing key messages and promote women's employment, particularly in non-traditional roles, in the local community.
- Conducting school visits at the grade and post secondary levels to promote employment opportunities in the aquaculture industry. When conducting such visits, GNS will use female role models employed by the company.
- Reinforce key messages promoting women's employment in media interviews and presentations.
- Sponsor programs designed to promote women's employment (e.g. Women in Science and Engineering (WISE) program.)

3.0 Land Based and Marine Based Operations

3.1 Recruitment

GNS is committed to being an equal opportunity employer devoted to gender diversity with competitive benefits, compensation, and the continuous improvement associated with the advancement of employment of women within the organization. This includes with respect to its own direct workforce, as well as supporting contractors and subcontractors to maximize the involvement of women in the Project's labour force where qualified for Project requirements.

To support the recruitment of women in its workforce GNS will adhere to the following policies and practices:

- Commit to working with training institutions in the province (including the Fisheries and Marine Institute) to support the integration of female registered students and their transferrable skills into the GNS workforce. These programs at training institutes such as the Fisheries and Marine Institute are skills and trades that are applicable to the Grieg group of companies and have representation of females in all fields (Table 1). GNS will commit to coordinating with these institutes for recruitment fairs as well as work term placements for female graduates.

Table 1: Enrollment by gender for the fall 2014 and fall 2015 Diploma and Advanced Diploma programs at the Fisheries and Marine Institute of Memorial University of Newfoundland

Marine Institute Program	Total Enrollment (# Females)	
	Fall 2014	Fall 2015
Advanced Diploma	24 (7)	17 (6)
Food Safety	12 (3)	9 (2)
Sustainable Aquaculture	7 (2)	3 (2)
Water Quality	5 (2)	5 (2)
Diploma in Technology		
Food Technology	15 (8)	14 (6)
Year 1	4 (4)	
Year 2	2 (1)	4 (4)
Year 3	5 (1)	1
Year 4	4 (2)	9 (2)

Marine Institute Program	Total Enrollment (# Females)	
	Fall 2014	Fall 2015
Marine Environmental Technology	35 (30)	30 (24)
Year 1	16 (13)	9 (6)
Year 2	11 (9)	12 (10)
Year 3	8 (8)	9 (8)

Source: Fisheries and Marine Institute, School of Fisheries, 2016

In addition to the various communication measures described in the previous section, GNS will also implement the following related to recruitment of the Project workforce:

- Develop training sessions to educate supervisors and managers in the recruitment processes to guarantee practices free of gender prejudice.
- Have a hiring panel consisting of men and women who support gender diversity.
- Provide equal worth to job qualifications and work experience despite gender.
- Consider, where possible and practical, job shadowing and on-the-job opportunities to women enrolled in science, technology fields, and industrial trades where women are underrepresented (WISE program, student work terms).
- Continue to practice a zero tolerance policy on discrimination and harassment.
- Continue to support and promote hiring practices that are consistent with a healthy and productive working environment.
- Ensure that women are appropriately represented throughout the workplace.
- Conduct exit interviews for analysis and feedback into the Company's recruitment and retention plan.

The Burin Peninsula is an area of traditionally high Employment Insurance (EI) prevalence and GNS will have a significant positive impact on the labour force and ultimately the EI use in the region. The following table depicts the EI beneficiaries reported for the entire Burin Peninsula 2012-2014. As indicated in Table 2, 40% (4,770 individuals) of the labor force on the Burin Peninsula filed EI claims in 2014 with 38 % (1,805 individuals) of these beneficiaries being female. The very nature of this work will have positive impacts on the female workforce and particularly the prime labour force. Since operations for GNS will be full time

and not seasonal, this project could employ persons, particularly females in small communities on the Burin Peninsula where employment is often difficult to find and can provide them with long term employment security as opposed to relying on EI benefits for a portion of the year. In addition, the processing plant will create jobs in St. Lawrence and Fortune, two towns where at the present there is very little new employment activity.

Table 2: Prevalence of EI Beneficiaries Burin Peninsula, Newfoundland 2012-2014

	2012	2013	2014
Labour force	11,940	11,927 ³	11,925
EI beneficiaries	5,710	5,260	4,770
EI prevalence	47.8%	44.1%	40.0%
<i>Age of Beneficiary</i>			
Youth (less than 25)	430	360	305
Prime labour force (25-54)	3,470	3,150	2,875
Age 55+	1,810	1,740	1,585
<i>Gender of Beneficiary</i>			
Male	3,615	3,380	2,965
Female	2,095	1,880	1,805
% female	36.7%	35.7%	37.8%

Source: Government of Newfoundland Community Accounts

3.2 Hiring

The hiring process that GNS and contractors utilize must ensure that fair and equitable access is provided to all eligible candidates. Further, all employees must accept the importance and value of gender diversity in establishing a healthy productive workplace. Currently GNS has seven employees, four of which are women. In the future GNS intends to hire 24 full time employees and six temporary employees for land based operations with a 25% female target.

In support of this objective, GNS will implement the following initiatives:

- Ensure job advertisements state that GNS is an equal opportunity employer and will show women engaged in work when graphics / pictures are utilized.
- Participate in career fairs and school visits. Utilize women employed in non-traditional occupations and other success stories to support such efforts.
- Provide work term opportunities to women enrolled in cooperative education programs in the science, trades and technology fields.
- Ensure that individuals involved in the recruitment process are familiar with applicable Federal and Provincial Human Rights, labour, occupational health and safety, worker's compensation and other relevant legislation through the distribution of published educational material.

3.3 Career Planning

GNS is focused on strengthening, mentoring, and coaching structures that provide employees with the knowledge, skills and motivation to accomplish short and long terms goals within the aquaculture industry. GNS will use a series of management programs to fully support women at all levels within the organization through training, workshops, policies, etc. as they express interest to advance in their careers. The programs will be modified as feedback is received from employees and from monitoring developments in technology and learning from other organizations.

In addition, GNS will support women's advancement in their careers by:

- Developing and maintaining an internal commitment from managers and supervisors to identify potential employees for higher-level positions within the company.
- Promoting a culture that supports a positive relationship between men and women.
- Providing opportunities to enhance women's professional development.
- Identifying and addressing barriers that can be deterrents to peak performance.
- Allocating required resources, including mentors, to assist employees in career planning and aspirations.
- Examining innovative ways for employees to network and support career growth and planning for women.

GNS's Human Resources Department will take the necessary steps to align operational requirements with employee needs. GNS is confident that with sound business practices and clear company goals gender diversity will play an important role in the Grieg group of companies' workforce in addition to the training future of leaders.

3.4 Retention

GNS will develop a strategy to address the challenge of employee retention in the long-term in accordance with GNS's overall Human Resources philosophy. The major challenge for employers and workers is the retention of women in traditionally male-dominated industries and occupations. A key component to improve the situation is again the effectiveness of the gender analysis information where women and men working together contribute to policy and workplace conditions decision-making. GNS's plan for gender diversity starts with the premise that both men and women must be involved in building a welcoming and productive workplace.

In addition to the recruitment of women, GNS has also initiated policies and practises to retain and promote its existing women's work force. These include but are not limited to:

- A zero tolerance approach to gender-related harassment.
- Provide work schedules that promote better work/life balance and career path planning that offer the flexibility necessary to attend to family responsibilities.
- Reduce sources of unnecessary stress in the workplace such as harassment and work-family conflict.
- An employment equity policy throughout GNS.
- Work with contractors to ensure consistency in policy development and implementation.
- Hire qualified women to be developed as trainers and mentors where possible.
- Ensure that the compensation system provides for equal pay for equal work.

GNS will continue to communicate and update its policies with regards to gender diversity and women's employment.

By implementing the above policies and practices GNS believes that it is working toward a better, healthier working environment free of any form of harassment and discrimination towards women. Further details

on GNS plans to help ensure a diverse, safe and respectful workplace for its Project are detailed in the sections that follow.

4.0 Workplace Policies and Conditions

GNS has developed a number of workplace policies and practices to be adopted by the Company's Human Resources Department to ensure women are not only represented within GNS and its subsidiaries but also will have equality in all aspects of the business including compensation, respect, and dignity. These initiatives include but are not limited to:

1. GNS has developed a Code of Conduct and Ethics that supports women in the workplace. Employees will be expected to adhere to this Code and act in a positive manner in all that they do and say. Behaviour or conduct that is offensive including any form of harassment will not be tolerated and disciplinary action, including termination if necessary, will be taken.
2. Ensuring that all employees, contractors and subcontractors are aware of GNS standards, practices and policies related to the employment and involvement of underrepresented groups. These will be clearly documented and displayed at the Project worksite.
3. All Project workers will be provided with an orientation and induction program that includes health and safety, cultural awareness, gender sensitivity, and environmental awareness training.
4. Strict enforcement of corporate policies and practices related to women's employment and respectful workplaces, and a requirement for contractors to have an associated standard with a zero tolerance for harassment.
5. All Project facilities will comply with applicable regulatory requirements, including those related to accessibility and gender, as a minimum. This will include providing gender separate accommodations, washroom facilities and locker or change rooms wherever possible, as well as correctly fitting personal protective equipment. and appropriate tools and equipment to accommodate women's needs where feasible.
6. The use of gender inclusive / neutral language in all written correspondence and verbal communications with employees. Also, ensuring that gender equity and workplace diversity is evident in any images used in regular employee communications and notices.
7. GNS employees will be expected to use gender sensitive language in all their work activities.
8. GNS will ensure that opportunities exist for representation by women on all workplace committees where interest exists.

9. Providing on-going assistance and support in the workplace, including on-site workplace committee(s), employee assistance programs, and mentoring for women.
10. Ensuring that applicable policies and practices related to inclusion and diversity are known and communicated, including clearly outlined incident reporting procedures.
11. Providing supervisors with respectful workplace training to enable them to address any situations that may arise in a timely, safe and appropriate manner.
12. Continual reinforcement of Project-related policies and requirements about gender equity and diversity through regular tool box talks, lunch and learns, supervisory training, meetings, worksite posters and other such means.
13. Ensuring adequate and appropriate security onsite at all times, including that worksites, common areas and parking lots are well lit to support personal safety.
14. Conducting, through the HR Department, exit interviews with all employees (including females) and using this information to identify and address any identified concerns, including those that may be related to workplace conditions.

4.1 Non-discrimination Policies

GNS recognizes and respects the *Canadian Human Rights Act* which prohibits employers from discriminating against individuals in hiring, firing, or the terms and conditions of employment because of certain personal characteristics. GNS expects this same commitment from its employees in all business activities. GNS has developed a Code of Conduct and Ethics that will also apply to gender in the workplace in which GNS clearly states that it expects the following behaviour from all its employees in all business activities:

- Respect the dignity of all individuals and ensure your actions and your workplace environment is free from all forms of discrimination including harassment and bullying.
- Do not label, categorize or treat others as a member of a different class.
- Ensure all decisions (employment, promotion, assignments) are based on job qualifications (education, training, experience) and merit.
- Consult with management if a conflict should arise that you feel is in violation of the laws, customs, beliefs or policies for any individual.
- Report any form of discrimination including hostile environments that you observe or may have experienced in the workplace.

4.2 Contractors and Partner Companies

GNS recognizes that as the Proponent of the Project it has overall leadership responsibility for advancing gender equity and diversity in the development of this Project. This will be guided and driven by the corporation's overall goals and core values, along with its policies, strategies and initiatives related to workplace diversity and equity as highlighted earlier in this document.

The implementation and success of the various initiatives outlined in this Plan also depends, however, on the cooperation and support of a variety of Project participants and stakeholders, including GNS contractors and their subcontractors, Project workers, government departments and agencies, industry associations, social and advocacy organizations, and others.

The goals, objectives and requirements of this Plan will be clearly communicated to all organizations and individuals involved in the Project. Given for example that the construction of the Project itself, and therefore any associated hiring, will be primarily undertaken by contractors, these companies will clearly have a key role in implementing this Plan and seeking to achieve its underlying goals and objectives. GNS will facilitate this by requiring contractors and subcontractors to be fully aware of and implement the various measures and principles outlined herein, by ensuring that these factors are considered in the procurement processes for the Project, through on-going communications and oversight, and through its continued participation in existing forums and initiatives that help to increase the involvement of women and other underrepresented groups in such projects. All contractors will be required to take proactive steps to increase the involvement of women through their respective hiring practices, and to implement the measures outlined in this Plan in a timely and effective manner. This will include strategies and procedures for the creation and maintenance of a safe, respectful and inclusive workplace, including associated policies and procedures and their communication, worker orientation and training, ensuring appropriate facilities and equipment, addressing any incidents or complaints, and other such measures as outlined in this Plan. All contractors will also be required to track and regularly report to GNS as requested on their various equity and diversity initiatives and outcomes.

As an equal opportunity employer, GNS will therefore ensure that contractors and partner companies will be informed of our Women's Employment Plan as well as the GNS code of conduct. GNS will work with contractors and partner companies and organizations to promote the Women's Employment Plan and its initiatives.

5.0 Monitoring and Reporting

GNS also recognizes the importance of monitoring and evaluating its women's employment objectives and initiatives, and to making adjustments to this Plan as required based on the principle of continuous improvement and through an on-going adaptive management approach. The company will use various means to gather information on the outcomes of its initiatives, including discussions with workers, supervisors and management which may take the form of workplace committees, focus groups (both formal and informal), exit surveys, and other discussions.

GNS will establish a four-person committee comprised of the General Manager, the Human Resources Manager and two other senior staff to monitor the Women's Employment Plan and program. This Committee will meet at least annually to review the company's performance. Any recommendations for changes arising from this feedback will be considered with respect to safety, productivity and cost, and a plan for execution of any necessary corrective measures will be developed.

GNS will also report to the Government of Newfoundland and Labrador on the Plan's implementation and outcomes. Specifically, this will involve regular reporting to the Minister Responsible for the Status of Women on the implementation of the various initiatives outlined in this Plan. These reports will include employment data by identified group and occupation (NOC) during the implementation phases of the Project. The reporting will indicate the number of individuals and total work hours undertaken by women during the Project for the reporting period in question.

It is proposed that this reporting will begin upon commencement of Project construction and will extend into the initial 2-3 years of operation, until such time as the entire Project workforce is in place and has largely stabilized. The nature and frequency of this reporting will be determined and developed in consultation with the Women's Policy Office.