



TMX GROUP LIMITED
RESPECTFUL WORKPLACE POLICY

January 26, 2022

**TMX GROUP LIMITED
RESPECTFUL WORKPLACE POLICY**

Effective Date:	January 26, 2022	Review Period:	Two Years	Date of Last Review:	June 25, 2020
Supersedes:	TMX Group Limited Respectful Workplace Policy				
Sponsor:	Cindy Bush Chief Human Resources Officer, Human Resources				
Owner:	Petra Moravec Director, Human Resources, Human Resources				
Approver:	TMX Strategy & Risk Committee				

1. PURPOSE

- 1.1** TMX Group Limited and its subsidiaries (“**TMX**”) are committed to fostering a Workplace based on mutual respect, cooperation and trust, by ensuring that its Workplace: (a) is inclusive and mutually respectful; (b) is free from any and all Inappropriate Workplace Behaviour that undermines TMX’s commitment to maintain a respectful Workplace; and (c) embraces TMX’s values of Client-centric, Courage and Trust.

2. SCOPE

- 2.1** This Policy applies to all TMX employees.
- 2.2** This Policy is supported by the Respectful Workplace Procedure (the “**Procedure**”), which outlines the process and actions required to implement this Policy.

3. DEFINITIONS

- 3.1** “**Good Faith**” means honesty in the intention to report an Informal Report or Complaint without malice or intent to damage the reputation of a TMX employee and/or TMX.
- 3.2** “**Inappropriate Workplace Behaviour**” means behaviour in a workplace that directly or indirectly affects the physical and/or mental health of employees and the safety of individuals and groups. Examples of Inappropriate Workplace Behaviour include:
- (a) Disrespectful Behaviour;
 - (b) Discrimination;
 - (c) Workplace Harassment;
 - (d) Workplace Sexual Harassment;

- (e) Workplace Violence; and
- (f) Substance Abuse.

3.3 “**TMX employee**” means any person who is a permanent, contract, seconded or temporary agency employee or a consultant of TMX.

3.4 “**TMX manager**” means a TMX employee’s direct supervisor.

3.5 “**Workplace**” means all TMX offices and/or locations visited by TMX employees while working on TMX related business, including, but not limited to: conferences, meetings, vendor/supplier or customer sites. A “Workplace” also includes work related social gatherings and interactions between TMX employees and TMX clients, customers and members of the general public.

4. ROLES AND KEY RESPONSIBILITIES

4.1 Each TMX employee

- (a) has a shared responsibility to promote a respectful Workplace that values diversity and inclusion; safety, dignity of a person, courteous conduct, mutual respect, fairness and equality and collaborative working relationships; accepts responsibility for their own actions, reactions, and behaviours and their impact on others and behaves in a respectful and appropriate manner towards TMX employees, or other individuals, at all times; and
- (b) is encouraged to report Inappropriate Workplace Behaviour, as soon as practicable, knowing that their concerns will be taken seriously and that appropriate action will be taken, especially where there is an imminent threat or risk of violence that could compromise a TMX employee’s safety.

4.2 Each TMX manager

- (a) must promote awareness of this Policy amongst TMX employees;
- (b) must treat all reports of Inappropriate Workplace Behaviour seriously and report them to Human Resources;
- (c) must support all parties involved in resolving any report of Inappropriate Workplace Behaviour;
- (d) must take appropriate action in a prompt, impartial and confidential manner when a report of Inappropriate Workplace Behaviour is made to them;
- (e) must recognize and take action on conduct that is or may be a violation of this Policy including actions that may offend, embarrass or humiliate a TMX employee, whether deliberate or unintentional; and
- (f) must ensure there is no retaliation against a TMX employee for reporting Inappropriate Workplace Behaviour or participating in an investigation.

4.3 Human Resources

- (a) must promote awareness of this Policy amongst TMX employees;
- (b) must treat all reports of Inappropriate Workplace Behaviour seriously;
- (c) must counsel TMX employees on their rights and options with regards to this Policy;
- (d) must consult with and provide advice to TMX managers and the TMX Senior Management Team in the application of this Policy;
- (e) must foster a Workplace culture of trust, courage and integrity supported by early detection and reporting of a violation of this Policy; and
- (f) must ensure that there is no retaliation against a TMX employee for reporting Inappropriate Workplace Behaviour or participating in an investigation.

4.4 TMX Senior Management Team

- (a) must promote awareness of this Policy amongst TMX employees;
- (b) must treat all reports of Inappropriate Workplace Behavior seriously and report them to Human Resources;
- (c) must support all parties involved in resolving any report of Inappropriate Workplace Behaviour;
- (d) must foster a Workplace culture of trust, courage and integrity supported by early detection and reporting of a violation of this Policy; and
- (e) must ensure that there is no retaliation against a TMX employee for reporting Inappropriate Workplace Behaviour or participating in an investigation.

5. POLICY PRINCIPLES

5.1 General

- (a) Each TMX employee has a personal responsibility to ensure that the Workplace is one in which all TMX employees are treated with dignity and respect, free from Inappropriate Workplace Behaviour.
- (b) TMX employees are encouraged to speak up and will not experience retaliation, or be disadvantaged, for raising concerns or reporting Inappropriate Workplace Behaviour.
- (c) TMX does not tolerate reports that are not made in Good Faith.

6. STANDARD

6.1 The following Standard is available for this Policy:

- (a) Respectful Workplace – Standard