JW Aluminum is committed to providing all teammates with a healthy and safe work environment. JW Aluminum will ensure that procedures exist to allow complaints of bullying to be dealt with and resolved within JW Aluminum, without limiting any person’s entitlement to pursue resolution of their complaint with the relevant statutory authority. JW Aluminum is committed to the elimination of all forms of bullying.

This policy applies to all teammates of JW Aluminum. It applies during normal working hours, at work related or sponsored functions, and while traveling on work related business. There will be no recriminations for anyone who in good faith alleges bullying.

**DEFINITIONS**

Bullying is unwelcome or unreasonable behavior that demeans, intimidates or humiliates people either as individuals or as a group. Bullying behavior is often persistent and part of a pattern, but it can also occur as a single incident. It is usually carried out by an individual but can also be an aspect of group behavior (see "mobbing" below). Some examples of bullying behavior are, but are not limited to:

*Verbal communication*

* Abusive and offensive language
* Insults
* Teasing
* Spreading rumor and innuendo
* Unreasonable criticism
* Trivializing of work and achievements

*Manipulating the work environment*

* Isolating people from normal work interaction
* Excessive demands
* Setting impossible deadlines

*Psychological manipulation*

* Unfairly blaming for mistakes
* Setting people up for failure
* Deliberate exclusion
* Excessive supervision
* Practical jokes
* Belittling or disregarding opinions or suggestions
* Criticizing in public

Context is important in understanding bullying, particularly verbal communication. There is a difference between friendly insults exchanged by long-time work colleagues and comments that are meant to be, or are taken as, demeaning. While care should be exercised, particularly if a person is reporting alleged bullying as a witness, it is better to be genuinely mistaken than to let actual bullying go unreported.

**Mobbing.** Mobbing is a particular type of bullying behavior carried out by a group rather than by an individual. Mobbing is the bullying or social isolation of a person through collective unjustified accusations, humiliation, general harassment or emotional abuse. Although it is group behavior, specific incidents such as an insult or a practical joke may be carried out by an individual as part of mobbing behavior.

**CONSEQUENCES OF BULLYING**

Bullying is unacceptable behavior because it breaches principles of equality and fairness, and it frequently represents an abuse of power and authority. It also has potential consequences for

everyone involved.

**For those being bullied.** People who have been bullied often suffer from a range of stress- related illness. They can lose confidence and withdraw from contact with people outside the workplace as well as at work. Their work performance can suffer, and they are at increased risk of workplace injury.

**For the employer.** Besides potential legal liabilities, the employer can also suffer because bullying can lead to:

* Deterioration in the quality of work
* Increased absenteeism
* Lack of communication and teamwork
* Lack of confidence in the employer leading to lack of commitment to the job

**For others at the workplace.** People who witness bullying behaviors can also have their attitudes and work performance affected. They can suffer from feelings of guilt that they did nothing to stop the bullying, and they can become intimidated and perform less efficiently fearing that they may be the next to be bullied.

**RESPONSIBILITIES**

*Managers and supervisors*

* Ensure that all teammates are aware of the anti-bullying policy and procedures
* Ensure that any incident of bullying is dealt with regardless of whether a complaint of bullying has been received
* Provide leadership and role-modeling in appropriate professional behavior
* Respond promptly, sensitively and confidentially to all situations where bullying behavior is observed or alleged to have occurred

*Teammates*

* Be familiar with and behave according to this policy
* If you are a witness to bullying, report incidents to your supervisor, President or Human Resources Director as appropriate
* Where appropriate, speak to the alleged bully(ies) to object to the behavior

**IF YOU THINK YOU HAVE BEEN BULLIED**

* Any teammate who feels he or she has been victimized by bullying is encouraged to report the matter to his or her supervisor, or with Human Resources.
* Where appropriate, an investigation will be undertaken and disciplinary measures will be taken as necessary.

**Record of Revision**

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| --- | --- | --- |
| **Revision No.** | **Issue Date** | **Description** |
| 1 | 06/2023 | Document Created |
| 2 | 03/2024 | Not documented |
| 3 | 05/08/2025 | Converted to controlled document. |