

ALZAI HEALTH CORP.
(the “Corporation”)

RESPECT IN THE WORKPLACE POLICY

Purpose

1. This policy describes prohibited workplace conduct and provides a process for investigating complaints (the “**Policy**”).

Policy

2. **Policy Statement**

- (a) The Corporation is committed to providing a collegial working environment in which all individuals are treated, and treat each other, with respect and dignity. The Corporation prohibits discrimination, harassment and violence in the workplace and in the conduct of its business. Each individual has the right to work in a professional atmosphere which promotes equal opportunity and respect. Human rights legislation prohibits discrimination in employment practices, terms and conditions on protected grounds where such conduct is not reasonably justifiable. Occupational Health and Safety legislation also prohibits violence and harassment in the workplace. The Corporation requires all employees, contractors and consultants to comply with the law and this Policy.
- (b) Workers, contractors and consultants working with Corporation are expected to behave in an appropriate manner at all times, including at events outside the workplace if the worker/contractor/consultant’s presence is connected with the Corporation and its business, for example, during a business trip or at social functions arranged on behalf of Corporation or where attending as a representative of the Corporation.
- (c) The Corporation has adopted this Policy to make clear that any Harassment (as herein defined) or Workplace Violence (as herein defined) is not tolerated in the Corporation. Individuals, regardless of seniority or level of authority, found to have engaged in conduct constituting Harassment or Workplace Violence will be subject to appropriate discipline, up to and including termination of employment or termination of contract.

3. **Application and Purpose of the Policy**

- (a) This Policy applies to all those working at the Corporation, including contractors and consultants.
- (b) The purposes of this Policy are:
 - (i) to maintain a working environment that is free from Harassment and Workplace Violence;
 - (ii) to alert workers, contractors and consultants of the Corporation to the fact that Harassment and Workplace Violence in the workplace is in violation of the law; and

- (iii) to establish a mechanism for receiving complaints of Harassment and Workplace Violence and to provide a procedure by which the Corporation will deal with such complaints.
- (c) Notwithstanding the existence of this Policy, every worker of the Corporation has the right to seek assistance from the Human Rights Commission or Tribunal in the province in which the worker is employed or engaged, or to make a complaint under Occupational Health and Safety legislation or refuse unsafe work, even when steps are taken under this Policy.
- (d) This Policy is not intended to constrain acceptable social interaction between workers, contractors and consultants of the Corporation.
- (e) The Corporation recognizes that a worker, contractor or consultant of the Corporation, while carrying out their work, may be subjected to Harassment or Workplace Violence by others who are not in the direct employ of the Corporation, but who conduct business with the Corporation (e.g. customers, suppliers, etc.). In this instance, the Corporation acknowledges its responsibility to investigate the complaint and take such steps as are reasonable and appropriate in the particular circumstances.

Definitions

4. For the purposes of this Policy, the following definitions will apply:

- (a) **“Complainant”** means the person who brings forward a complaint of Harassment or Workplace Violence under this Policy, and includes a person directly affected by the alleged Harassment or Workplace Violence or a third party;
- (b) **“Complainee”** means the person against whom a complaint of Harassment or Workplace Violence has been made;
- (c) **“Harassment”** means engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome. It also includes “workplace sexual harassment” which means (a) engaging in a course of vexatious comment or conduct because of sex, sexual orientation, gender identity, or gender expression, where the conduct is known or ought reasonably to be known to be unwelcome; and (b) making a sexual solicitation or advance where the person making it is in a position to confer, grant, or deny a benefit or advancement and knows or ought reasonably to know the solicitation is unwelcome. Workplace harassment does not include reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace.
- (d) **“Workplace Violence”** means (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or (c) a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

- (e) **“Domestic Violence in the Workplace”** means a person who has a personal relationship with a worker (e.g., a current or former spouse, current or former intimate partner or a family member) may physically harm, or attempt or threaten to physically harm, that worker at work. Workers must report to Company if workers could be exposed to domestic violence at the workplace. For the purposes of this Policy, Domestic Violence in the Workplace is included when reference to “Violence” is made.
5. Harassment may include, but is not limited to:
 - (a) written or verbal abuse or threats;
 - (b) racial or ethnic slurs;
 - (c) unwelcome remarks, jokes, innuendo or taunting about a person’s body, attire, age, marital status, pregnancy, sexual orientation, ethnic, racial origin, disability, handicap, religion or any other prohibited ground;
 - (d) display of sexual, racial, ethnic or religious offensive material;
 - (e) unwelcome sexual remarks, gestures, repeated invitation, requests or insults, whether indirect or explicit;
 - (f) leering or other obscene or offensive gestures;
 - (g) repeated incidents of wearing inappropriate clothing that attracts sexual attention;
 - (h) unwelcome physical conduct such as touching, hugging, kissing, pinching;
 - (i) sexual assault and physical assault; and
 - (j) unequal treatment in employment practices based on a prohibited ground that is not reasonably justifiable.
 6. Harassment also includes any form of retaliation or reprisal against an individual for having invoked this Policy, for having participated or cooperated in an investigation under this Policy, or for having associated with the person who properly invoked this Policy.
 7. Harassment may be either intentional or unintentional; unintentional behaviour may still constitute Harassment but may attract different action by the Corporation than if the behaviour was intentionally meant to harass. It is not an acceptable defence to say that offence was not intended. It is the effect of the conduct that is material.
 8. For the purposes of this Policy, work-related Harassment means harassment or discrimination by a worker, contractor or consultant of the Corporation that occurs either in the working environment or anywhere else if as a result of employment responsibilities or employment relationships.
 9. General discipline should not be confused with Harassment. The discipline of workers is part of the regular work environment.

Responsibilities of the Corporation

10. In connection with this Policy, the Corporation is committed to providing a workplace that is free from Harassment and Workplace Violence shall:
 - (a) encourage a workplace free from Harassment and Workplace Violence;
 - (b) investigate each complaint of Harassment or Workplace Violence, where appropriate in the circumstances;
 - (c) take appropriate action, including imposing discipline, when a complaint of Harassment or Workplace Violence is substantiated as a result of an investigation conducted under this Policy, regardless of the seniority of the offender, where appropriate in the circumstances;
 - (d) support and assist any worker, contractor or consultant of the Corporation who files a complaint of Harassment or Workplace Violence in good faith;
 - (e) support and assist any worker, contractor or consultant of the Corporation who complains of Harassment or Workplace Violence by a person who is not a worker, contractor or consultant of the Corporation;
 - (f) review the procedures of this Policy as often as necessary, but at least annually, to ensure that it adequately meets the Policy objectives;
 - (g) maintain records as required by this Policy;
 - (h) make all workers, contractors and consultants of the Corporation aware of the need to provide a workplace free from Harassment and Workplace Violence and of the existence of procedures available under this Policy; and
 - (i) appoint Advisors and provide training and resources for them to fulfill their responsibilities under this Policy.
11. Every worker, contractor and consultant working with Corporation has a responsibility to play a part in ensuring that the Corporation's workplace environment is free from Harassment and Workplace Violence. This responsibility is to be discharged by avoidance of any conduct that constitutes Harassment or Workplace Violence. In addition, any worker, contractor or consultant of the Corporation who believes that a colleague has experienced, or is experiencing Harassment, Workplace Violence or retaliation for having brought forward a complaint under this Policy, must notify one of the Advisors appointed under this Policy.

Responsibilities of Managers and Supervisors

12. Managers and supervisors shall:
 - (a) enforce policy, procedures and monitor worker compliance;
 - (b) not permit any worker to do work if it is likely to endanger the worker or another worker;
 - (c) not engage in or condone any acts or behaviours that are in conflict with this Policy;
 - (d) assist in the investigation process when required by Company; and

- (e) complete the incident form, when required;

Responsibilities of Workers

13. Workers shall:

- (a) be vigilant of risks of Workplace Violence and Harassment and report risks and/or hazards to their supervisor in a timely fashion;
- (b) participate in education and training programs so they can respond suitably to any incident of Workplace Violence or Harassment;
- (c) understand and comply with this Policy;
- (d) cooperate and participate in a fair investigation, when required;
- (e) report all incidents or injuries of Workplace Violence and/or Harassment or threats of Workplace Violence and/or Harassment to their supervisors or Advisors immediately; and
- (f) inform the Advisors about concerns regarding the potential for Workplace Violence and/or Harassment in the workplace;

Confidentiality

- 14. The Corporation understands it is difficult to come forward with a complaint of Harassment or Workplace Violence and recognizes the interests of those involved in keeping the matter confidential. To protect the interests of the Complainant, the person complained against, and any others who may report incidents of Harassment or Workplace Violence, confidentiality will be maintained throughout the investigatory process to the extent reasonably practicable and appropriate in the particular circumstances.
- 15. All records relating to a complaint, including: identifying information about any individuals involved, the content of meetings, interviews, results of an investigation, and any other relevant material, will be kept confidential by the Corporation, unless necessary for the purposes of investigating the incident or complaint, or for taking corrective action, or is otherwise required by law.

Advisors

- 16. The Corporation will appoint a minimum of 3 individuals to serve as Advisors under this Policy. The appointed Advisors are as outlined in RESPECT IN THE WORKPLACE POLICY hereto, which may be revised from time to time by the Corporation.
- 17. Each Advisor shall have access to notes and records kept by any other Advisor in relation to matters under this Policy. Advisors are entitled to confer with each other from time to time as they deem appropriate, unless a complaint involves an Advisor.
- 18. In carrying out their duties under this Policy, Advisors will be directly responsible to CEO, or in the event of a conflict in that regard, to the Chair of the Board of Directors of the Corporation.
- 19. The Corporation will arrange for Advisors to receive appropriate initial training as well as other institutional support and assistance in carrying out their responsibilities under this Policy.

20. The Advisors will maintain separate confidential files of all documentation and/or notes generated for each complaint received, whether verbal or written, under this Policy. Advisors may have access to those records as needed to resolve a complaint in accordance with this Policy.
21. In the event that an Advisor is in any way personally involved with the facts giving rise to the complaint or the investigation, that Advisor is excused from his or her responsibilities as an Advisor for that complaint only.

Procedure for Report and Handling Complaints

22. Initial Action by Complainant
 - (a) A Complainant who considers that they have been subjected to Harassment or Workplace Violence is encouraged, where reasonable to do so having regard to the nature of the conduct, to bring the matter to the attention of the Complainee.
 - (b) When the Complainant does not wish to bring the matter directly to the attention of the Complainee, or where such an approach is attempted and does not produce a satisfactory result, the Complainant should seek the advice of an Advisor.
23. Meeting with an Advisor
 - (a) The Advisor will provide a copy of the Policy to the Complainant and advise the Complainant of:
 - (i) the right to lay a formal written complaint under this Policy when the Complainee is a worker, contractor or consultant of the Corporation;
 - (ii) the availability of counselling and other support services provided by the Corporation;
 - (iii) the right to withdraw from any further action in connection with the complaint at any stage (even though Corporation may continue to investigate the complaint);
 - (iv) other avenues of recourse such as the right to file a complaint with the Human Rights Commission of the province in which the incident occurred, under Occupational Health and Safety legislation, or, where appropriate, the right to lay an information under the *Criminal Code*; and
 - (v) the time limits which apply to this Policy, and which may apply to such other avenues of recourse.

Outcomes to Meeting with Advisor

24. Where the Complainee is an employee, contractor or consultant of Corporation, there are three possible outcomes following a complaint of Harassment to an Advisor:

(a) Where the Complainant and Advisor agree that the conduct does not constitute Harassment or Workplace Violence:

- (i) If the Complainant and the Advisor, after discussing the matter, agree that the conduct in question does not constitute Harassment or Workplace Violence, as defined in this Policy, the Advisor will take no further action.

(b) Where the Complainant brings clear evidence of Harassment or Workplace Violence but does not wish to lay a formal written complaint:

- (i) It may happen that a Complainant (or a third party) brings to the attention of the Advisor facts which constitute clear evidence of Harassment or Workplace Violence but, after discussion with the Advisor, the Complainant decides not to lay a formal written complaint. In that event, the following steps may be taken:
 - (1) The Complainant may request that the Advisor speak to the Complainee with a view to encouraging the Complainee to apologize to the Complainant for the conduct complained of and/or to obtain an assurance from the Complainee that the conduct complained of will not be repeated; but thereafter proceed no further, with which the Advisor agrees; or
 - (2) The Advisor, having received clear evidence of Harassment or Workplace Violence, may decide to lay a formal complaint even if the Complainant does not wish to lay a complaint.
 - (3) The Advisor will make record of what was said to the Complainee regarding the allegation of Harassment or Workplace Violence.

(c) Where the Complainant does not wish to lay a formal complaint, but the Advisor decides that the evidence and the surrounding circumstances are such as to require the laying of a formal complaint, the Advisor will:

- (i) issue a formal written complaint signed by the Advisor;
- (ii) provide a copy of the complaint, without delay, to the Complainee and the Complainant; and
- (iii) provide a copy of the complaint, without delay, to the CEO for review.

The CEO will review the complaint and determine whether an investigation will be undertaken under Section 28.

(d) Where the Complainant decides to lay a formal complaint:

- (i) If the Complainant, after meeting with the Advisor, decides to lay a formal complaint, including the situation where the Advisor is of the view that the conduct in question does not constitute Harassment or Workplace Violence, the Advisor will:
 - (1) assist the Complainant with the drafting of a formal written complaint, which must be signed by the Complainant;
 - (2) provide a copy of the complaint, without delay, to the Complainee and to the Complainant; and
 - (3) without delay, file the complaint with the CEO or, in the event of a conflict, with the Chair of the Board of Directors.

Investigation of a Complaint

- 25. When the Advisor provides a copy of the complaint to the Complainee, the Advisor will include, with the complaint, a copy of this Policy.
- 26. The Advisor may, if the Complainant and Complainee consent, seek a resolution meeting with a view to obtaining an apology or such other resolution as will satisfy the Complainant, without further investigation. The Advisor will advise both parties that, even if the matter is resolved to the satisfaction of the Complainant and Complainee, the Advisor nonetheless has the discretion under this Policy to complete an investigation and to take whatever action is appropriate in the circumstances.
- 27. The CEO will ensure that every complaint that does not settle at a resolution meeting is investigated and, where appropriate, take action, including the imposition of discipline, up to and including termination of employment.
- 28. An investigation under this Policy will be undertaken by a person, or persons, appointed by the CEO. An Advisor who participated in any attempts to have the parties resolve the complaint through reconciliation will not undertake an investigation of that complaint. Investigators will have the authority to make findings on the facts as discovered from the Complainant, the Complainee, the Advisor, any witnesses or other source of information. The investigator shall report to the CEO their findings and recommendations as a result of the investigation into the complaint. The CEO will make a finding of whether Harassment or Workplace Violence has been proven on the balance of probabilities (meaning more likely than not), and the action, if any, to be taken, in accordance with Section 35 herein.
- 29. Where the CEO makes a finding of Harassment or Workplace Violence under Section 28 herein, a copy of the complaint and the outcome of the investigation, including any action to be taken, will be filed in the personnel file of the Complainee. The CEO may take any steps they deem reasonable and appropriate with respect to the manner of the filing of records relating to the Harassment or Workplace Violence, having regard to the privacy and confidentiality of the material contained in the investigation records to be filed on the Complainee's personnel file, including filing only a summary of the decision and discipline.

30. Where the investigation results in a finding that the complaint of Harassment or Workplace Violence has not been proven, no record of the complaint shall be kept in the personnel file of the Complainee.
31. The Complainant will be informed of the outcome of the investigation in writing which will include the nature of any action taken by the Corporation. If the Complainant is not satisfied with the outcome of the investigation, the Complainant will be reminded of the continuing right to file a complaint with the Human Rights Commission or under occupational health and safety legislation (or any other legislation covering the conduct complained of) of the province where they are employed.

Procedure Where a Person Believes that a Colleague is Harassed or subjected to Workplace Violence

32. Where a person believes that a colleague has experienced, or is experiencing, Harassment or Workplace Violence (or retaliation for having brought forward a complaint of Harassment or Workplace Violence) and reports this belief to an Advisor, the Advisor shall meet with the person who is said to have been subjected to Harassment or Workplace Violence and shall then proceed in accordance with Section 24 of the Policy.

Incidents of Harassment or Workplace Violence by Persons Who Are Not Workers of Corporation

33. A worker, contractor or consultant of the Corporation who considers that they have been subjected to Harassment or Workplace Violence by a person who is not a worker, contractor or consultant of the Corporation should seek the advice of an Advisor.
34. The Advisor will consult with the CEO and thereafter take such action as is reasonable and appropriate to ensure that the Corporation fulfills its responsibility to support and assist its employees, contractors and consultants, in keeping with this Policy.

Action by the Corporation Following a Finding of Harassment or Workplace Violence

35. If a complaint is substantiated following an investigation under this Policy, Corporation will take appropriate action against the worker, contractor or consultant who violated this Policy. The exact nature and extent of the action taken will be determined based upon the seriousness of the offence and the steps taken by the violator to remedy or apologize for the misconduct. Any action taken under this Policy, including discipline, is at the sole discretion of the CEO. The action taken may include any of the following:
 - (a) warning;
 - (b) suspension;
 - (c) prohibition from engaging in similar acts or conduct in the future;
 - (d) mandatory training or participation in a program to address and correct the offensive act or conduct;
 - (e) recommendation to compensation committee on compensation;
 - (f) termination of employment; and/or

- (g) any other action the Corporation deems appropriate in the circumstances.

Frivolous, Malicious or Vexatious Complaints

36. The Corporation will not condone false, frivolous, malicious or vexatious complaints. A worker, contractor or consultant of the Corporation who makes a false, frivolous, malicious or vexatious complaint may be subject to action in accordance with Section 35 of this Policy. In the event that the CEO finds a complaint to not be proven and to be false, frivolous, malicious or vexatious in intent, a record of same may be filed in the personnel file of the Complainant.

Time Limit for Filing a Complaint

37. A complaint under this Policy must be filed within a reasonable time following the occurrence of the event. The Corporation adopts a twelve (12) month time frame for the filing of a complaint under this Policy. Unless otherwise prescribed by law, the Corporation will have no obligation to deal with a complaint when facts upon which the complaint is based occurred more than twelve (12) months prior to the date the complaint is filed. The Corporation, exercising its sole and absolute discretion, is not precluded from invoking this Policy for matters that occurred more than twelve (12) months prior to the date the complaint is filed.

Delegation by CEO

38. The CEO may, in any situation involving a complaint, delegate any one of or all of their responsibilities and authorities to another member of the senior management team, the Board of Directors or an external advisor, for the purposes of ensuring that a complaint made under this Policy is dealt with reasonably and fairly. The CEO or their delegate may consult with and engage legal advisors and experts to assist in the performance of the duties and responsibilities set forth in this Policy.

Adopted and approved by the Board: October 15, 2025.

APPENDIX A
RESPECT IN THE WORKPLACE POLICY

As provided in Section 16, the following are the Advisors appointed for the purposes of this Policy:

Name	Email address
1. Hayim Raclaw	hayim@alzaihealth.com
2. Ofri Kait	ofri@alzaihealth.com
3. Jenny Greer	admin@alzaihealth.com