

Workplace Violence and Harassment Policy

Agway Metals Inc. is committed to the prevention of workplace violence and harassment. We take every reasonable step to protect workers from workplace violence or harassment by or against management, employee's, clients, independent contractors and anyone who has a relationship with the company.

Workplace violence and harassment will not be tolerated from anyone and such actions are considered a serious offence for which immediate action will be taken.

For the purpose of this policy "WORKPLACE VIOLENCE" means:

- The exercise of physical force by a person against a worker in a workplace that causes or could cause physical
 injury to the worker,
- An attempt to exercise physical force against a worker in a workplace that could cause physical injury to the worker,
- 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, or
- Any workplace violence that is of a sexual nature.

"Harassment" means engaging in a course of vexatious comments or conduct, including that of a sexual nature, against a worker in a workplace that is known or ought to reasonably be known to be unwelcome. This includes any inappropriate conduct, comment, display, action or gesture by a person that:

- Adversely affects the worker's psychological or physical well-being and that the person knows or ought reasonably to know would cause a worker to be humiliated or intimidated; and
- · Constitutes a threat to the health or safety of the worker.

Agway Metals Inc. has developed a workplace violence and harassment program to implement this policy. It includes measures and procedures to protect workers from workplace violence and harassment, the means of summoning assistance and the process for reporting incidents of workplace violence or harassment.

Supervisors have a responsibility to assess the risk of violence to employees, minimizing those risks where necessary or reasonably possible and informing any affected employee of such risk or potential risk. Managers must act respectfully towards others and ensure that all employees have been appropriately trained to recognize the potential for violence or harassment. The management team will investigate and deal with all incidents of workplace violence or harassment in a fair and timely manner, respecting the privacy of all concerned as appropriate.

Employees have a responsibility to act respectfully towards others and to inform a manager of any violence, potential violence or harassment that they experience or witness free from negative consequences for reports made in good faith. Employees are responsible for attending any training or information sessions provided by the employer and co-operating with any efforts to investigate and resolve matters pertaining to this policy. It is in the best interest of all parties to treat people fairly.

Jamie Robertson President & CEO