			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

STATEMENT

The Town of Gibbons is committed to ensuring the safety and security of all employees. In pursuit of this goal, the Town of Gibbons has established a zero-tolerance rule for harassment or violence in the workplace. If harassment or violence should occur, at the Town of Gibbons, this policy also outlines the process for complaints and investigations.

The organization will create prevention plans for violence and harassment and these will be developed in consultation with the health and safety committee or health and safety representative, as applicable. They will also be regularly reviewed and updated.

1. DEFINITIONS

As per Alberta's Occupational Health and Safety (OHS) Act and taken directly from the government of Alberta:

"Workplace Harassment" means: a single or repeated incident of objectionable or unwelcome conduct, comment, bullying, or action intended to intimidate, offend, degrade or humiliate a particular person or group. It is a serious issue and creates an unhealthy work environment resulting in psychological harm to workers.


Workplace harassment includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and a sexual solicitation or advance.

"Sexual harassment" involves any unwanted sexual behaviour that affects or prevents a person from getting or keeping a job, promotion or living accommodations. It is a form of discrimination based on the grounds of gender, including transgender, which is prohibited under the Alberta Human Rights Act.

It includes unwanted or uninvited:

- sexual remarks
- gestures
- sounds like leering or whistling
- actions that make a person feel unsafe, degraded or uncomfortable, even if the harasser claims to have been only joking

"Workplace Violence," whether at a worksite or work related, is defined as the threatened, attempted, or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm. It can include:

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

- physical attack or aggression
- threatening behaviour
- verbal or written threats
- domestic violence
- sexual violence

“Workplace” refers to any land, premises, location, or thing at, upon, in or near which a worker works including the organization's offices, off-site locations where work is performed, social events related to work or away from work but resulting from work (i.e., a threatening phone call to your home or another personal electronic contact from co-workers or clients).


The rules in Part 27 of the OHS Code:

- define workplace harassment and violence in all forms, including domestic and sexual violence
- require employers to investigate incidents of violence and harassment and take corrective action
- require employers to develop violence and harassment prevention plans
- require review of plans at least once every 3 years
- require employers to advise workers of treatment options if harmed by violence or harassment; workers are entitled to wages and benefits while attending treatment programs

Note that this Workplace Violence and Harassment Policy is administered in conjunction with The Town of Gibbons’s Human Rights Commitment and includes freedom from discrimination under any of the grounds established by the Alberta Human Rights Code, including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed (religion), sex (including pregnancy), sexual orientation, gender identity, gender expression, age (18 and over), marital status (including same-sex partners), family status, disability, and record of offences.

2. SAFE WORKING ENVIRONMENT

- 2.1 The Town of Gibbons is committed to ensuring a safe working environment, specifically one that is free from violence and harassment. To ensure employee safety, this policy will outline the following:
- 2.1.1 Awareness of what violence and harassment are
 - 2.1.2 Responsibilities of workplace parties

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25


- 2.1.3 Hazard assessment
- 2.1.4 Prevention plans
- 2.1.5 Incident investigation and reporting
- 2.1.6 Worker training

3. COMMITMENT

- 3.1 The Town of Gibbons is committed to eliminating wherever possible, or as much as is reasonably practicable, the hazard of violence and harassment in the workplace. If this is not reasonably practicable, The Town of Gibbons is committed to controlling the hazard of violence in the workplace.
- 3.2 Harassment and violence will not be tolerated from anyone including people external to the organization, such as clients or customers, as well as those within the organization, such as employees, volunteers, contractors, and managers.

4. AWARENESS OF VIOLENCE AND HARASSMENT

- 4.1 Here are some of the ways that violence or harassment could manifest in the workplace (note that this list does not include every example; please speak with your supervisor if you have any doubt about the appropriateness of an action):
 - 4.1.1 Threatening behaviour, including verbal threats or abuse
 - 4.1.2 Aggressive behaviour, including encroaching on personal space
 - 4.1.3 Any sort of physical assault
 - 4.1.4 The spreading of malicious rumours or gossip about an individual or a group
 - 4.1.5 The social exclusion or isolation of someone or a particular group of people in the workplace
 - 4.1.6 Damaging, hiding, or stealing someone's personal belongings or work equipment
 - 4.1.7 Persistently criticizing, undermining, belittling, demeaning, or ridiculing someone
 - 4.1.8 Swearing at someone or using inappropriate language toward them
 - 4.1.9 Using the Internet to harass, threaten or maliciously embarrass someone


			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

- 4.1.10 Using the Internet to make sexual threats, or to harass or exploit someone sexually
- 4.1.11 Abusing authority by publicly ridiculing or disciplining a subordinate
- 4.1.12 Abusing authority by interfering with a subordinate's performance or job (for example, blocking applications for leave, training, or promotion in an arbitrary manner)
- 4.1.13 Abusing authority by soliciting a sexual or romantic relationship from a subordinate, or making social invitations with sexual overtones to a subordinate
- 4.1.14 Making abusive or derogatory remarks or jokes about someone's gender, gender identity or gender expression, sex, or sexual orientation (for example, homophobic remarks)
- 4.1.15 Sexual touching (for example, patting, pinching, caressing, kissing, fondling)
- 4.1.16 Sexual invitations or requests in return for a promise of a reward (such as a promotion)
- 4.1.17 Displaying offensive posters, cartoons, or images of a sexual nature
- 4.1.18 Sending inappropriate electronic communications (for example, sexually explicit emails)
- 4.1.19 Domestic violence (also called intimate partner violence, domestic abuse or relationship abuse) is a workplace hazard when it occurs in the workplace (it puts the targeted employee at risk and may pose a threat to coworkers)

This list is sourced from the [Government of Canada](#)

5. SUPERVISORIAL/MANAGERIAL DUTIES

- 5.1 At the Town of Gibbons, nothing in this policy will limit the abilities of supervisors and managers to complete their duties provided they perform them in a respectful, professional manner in good faith. Any reasonable conduct of an employer or supervisor related to the normal management of workers, or a work site does not constitute workplace harassment. Differences of opinion or minor disagreements between coworkers are also not generally considered to be workplace harassment if steps are taken to resolve the conflict. The exercise of supervisorial/managerial authority could include:
 - 5.1.1 Supervising employees, including setting out their performance expectations and providing feedback (both positive and constructive) about their work performance

	TOWN OF GIBBONS Policy	WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25


- 5.1.2 Taking measures to correct performance, including using performance improvement plans
- 5.1.3 As necessary, taking disciplinary action
- 5.1.4 Assigning work to employees and directing to them how and when it should be done
- 5.1.5 Requesting updates or reports on the progress of the work
- 5.1.6 Managing time off requests, including either approving or denying requests
- 5.1.7 Where necessary, asking for medical documentation to support work absence(s)

6. OBLIGATIONS OF WORKSITE PARTIES

- 6.1 The Town of Gibbons is responsible to make sure employees are not subject to workplace violence or harassment. They must also ensure they do not participate in it.
- 6.2 At the Town of Gibbons, supervisors must make sure the workers they are supervising are not subject to workplace violence or harassment.
- 6.3 The Town of Gibbons employees must ensure they do not take part in violent or harassing behaviours at any time.

7. CONDUCTING A RISK/HAZARD VIOLENCE ASSESSMENT AND CREATING PREVENTION PLANS

- 7.1 The Town of Gibbons is committed to preventing workplace harassment and violence by implementing proactive risk prevention measures. To reduce the risk of harassment or violence, The Town of Gibbons will take into consideration specific risk factors that may contribute to these risks, including:
 - 7.1.1 Working in a community-based setting
 - 7.1.2 Interaction with the public and/or working with unstable or possibly volatile clients.
 - 7.1.3 The exchange of money
 - 7.1.4 Working alone or in small numbers
 - 7.1.5 Working at night
 - 7.1.6 Working in a high crime area

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

- 7.2 Prevention measures will be implemented to address these risks and ensure a safe work environment for all employees. Based on the results, the Town of Gibbons will put prevention plans and measures in place to mitigate the hazards.


8. SUMMONING IMMEDIATE ASSISTANCE - EMERGENCY PROCEDURES

- 8.1 If you require immediate assistance following an act of violence, are being threatened, or consider yourself to be in imminent danger, contact the police/emergency services immediately by dialling “911” and follow department/facility emergency response procedures (where relevant).
- 8.2 If you are unable to phone 911 right away, you should:
- 8.2.1 Yell for help.
 - 8.2.2 If in a vehicle, honk the horn repeatedly, turn on hazard lights and lock all vehicle doors.
 - 8.2.3 If possible, use the vehicle’s emergency alarm.
 - 8.2.4 Immediately move to a safe location.
 - 8.2.5 Contact a manager/supervisor.
- 8.3 Canada’s *Criminal Code* specifically lays out matters such as violent acts, sexual assault, threats, and behaviours such as stalking.

In the event of any of the above, the Town of Gibbons will immediately contact the police.

9. HISTORY OF VIOLENT BEHAVIOUR

- 9.1 Under the Alberta Occupational Health and Safety Act, the organization may be required to provide information (including personal information) to its employees about a person with “a history of violent behaviour” if:
- 9.1.1 The employee can reasonably be expected to encounter that person in the course of their work; and
 - 9.1.2 There is a potential risk of workplace violence because of exposure to the individual with a history of violent behaviour.
- 9.2 Pursuant to this obligation, if the organization is of the view that there is a risk of workplace violence such that an employee is likely to be exposed to physical injury, information that is

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

deemed reasonably necessary to protect employees from physical injury, including personal information and any known triggers of the individual's potentially violent behaviours will be communicated.

- 9.3 When disclosing personal information, the organization will limit as much as possible the amount of personal information provided and will not release any medical information that is deemed protected.
- 9.4 The organization will not disclose any information to individuals who are unlikely to encounter a person with a history of violence or to those who are not at risk of physical injury from that person.

10. DOMESTIC VIOLENCE


- 10.1 In the event the organization is aware that domestic violence could likely expose an employee to physical injury in the workplace, it will take every precaution reasonable in the circumstances for the protection of the affected employee(s).

11. INVESTIGATIONS OF COMPLAINTS

- 11.1 The Town of Gibbons will investigate any incidents of violence or harassment it becomes aware of and will take corrective action to address all incidents and complaints of workplace violence and harassment in a fair, respectful and timely manner.

12. MAKING A COMPLAINT / COMPLAINT INVESTIGATION PROCESS


- 12.1 Employees must:
- 12.1.1 Immediately report any incident of harassment or violence one is subject to or witnesses to management
 - 12.1.2 Participate as required in internal and external investigations concerning incidents of workplace harassment or violence.
- 12.2 At the Town of Gibbons complaints regarding harassment or violence may be brought forward to:
- 12.2.1 The CAO or the Assistant CAO
 - 12.2.2 An alternate complaint may be made to the Mayor or the Deputy Mayor if either of the above is the alleged perpetrator.

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25


- 12.2.3 Immediately upon receipt of a complaint, an investigation will begin, and additional information and context will be sought. The investigation may include:
- 12.2.4 A review of the details of the incident.
- 12.2.5 Separate interview(s) with the parties involved and any witnesses.
- 12.2.6 Examination of any relevant documents, emails, notes, photographs, or video.
- 12.2.7 A decision about whether the complaint constitutes workplace harassment or violence;
- 12.2.8 The preparation of a report which summarizes the incident, the steps of the investigation, the evidence collected, and any findings
- 12.3 The employee who disclosed the complaint, as well as the alleged perpetrator (provided they are both employees of [Organization Name]), will be kept up to date on the investigation and will be notified of the results of the investigation and any subsequent actions to be taken (as per the Confidentiality section below).
- 12.4 At the Town of Gibbons, supervisors/managers must:
 - 12.4.1 Take appropriate action(s) upon receipt of a complaint of workplace harassment or violence or when aware that workplace harassment or violence is occurring such as investigate incidents
 - 12.4.2 Prevent it from happening again
 - 12.4.3 Preparing investigation reports and retain them for at least 2 years
 - 12.4.4 Impose appropriate disciplinary measures in response to substantiated claims of workplace harassment or violence.
- 12.5 At the Town of Gibbons, all members of management who are aware, or who ought reasonably to be aware that incidents of workplace harassment or violence are occurring or are thought to be occurring are obligated to take appropriate action to stop the offending behaviours and actions, even in the absence of a formal complaint.

13. CONFIDENTIALITY DURING AND AFTER THE INVESTIGATION

- 13.1 The Town of Gibbons will ensure that it protects the privacy of any persons involved in:
 - 13.1.1 An occurrence

		TOWN OF GIBBONS Policy	WORKPLACE HARASSMENT POLICY AND PROCEDURE
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

- 13.1.2 The resolution process for an occurrence.
- 13.2 The Town of Gibbons will ensure that information and documents regarding a complaint or Incident, specifically the circumstances related to an incident of violence or harassment or the names of the complainant, the person alleged to have committed the violence, and any witnesses, will not be disclosed except to the extent necessary as required by law
- 13.2.1 investigate the incident
- 13.2.2 take corrective action
- 13.2.3 inform the parties involved in the incident of the results of the investigation and any corrective measures to be taken to address the incident
- 13.2.4 if necessary to inform workers of a specific or general threat of violence, potential violence, harassment, or potential harassment
- 13.3 At the Town of Gibbons, all parties involved in a workplace violence complaint, including Complainants, Respondents, witnesses, management, and support persons are expected to treat the matter and any information they become aware of as confidential. No party shall discuss the matter or associated details with other employees or witnesses. An employee may face disciplinary action if it is determined that they have failed to adhere to these confidentiality expectations.
- 13.4 The Town of Gibbons will prepare an investigation report outlining the circumstances of the incident and the corrective action taken. The employer must retain the investigation report for at least 2 years after the incident, keep it readily available, and provide a copy to an Alberta OHS officer on request.
- 13.5 All investigation notes and full reports will be retained in a separate file and are not to be saved in employee personnel files. Investigation outcome letters and disciplinary action will be saved in applicable employee files only when the complaint has been verified and is found to be in breach of this policy.
- 13.6 The Town of Gibbons will disclose only the minimum amount of personal information if disclosing any parts of the incident as described above. The personal information will only include:
- 13.6.1 what is necessary to inform workers of a specific or general threat of violence or potential violence or harassment or potential harassment.

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

14. APPLICABLE LAWS

- 14.1 This Workplace Harassment & Violence Prevention Policy is not intended to discourage or deter an employee from exercising their rights under any other applicable law, including the *Alberta Human Rights Act* and any other applicable laws.
- 14.2 No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy and the supporting procedures for addressing situations involving violence and harassment.

15. REFERRALS


- 15.1 Any employees who report an injury or adverse symptom resulting from an incident of violence or harassment at [Organization Name] are advised to consult a health professional for treatment or referral.
- 15.2 Should an employee be treated or referred by a physician as per the above, and the subsequent treatment sessions occur during regular work hours, the Town of Gibbons will not make a deduction from the employee's pay or benefits while they attend the session.

16. REVIEW AND UPDATE OF THIS POLICY AND PROCEDURES

- 16.1 The Town of Gibbons will review this policy every three years, or as often as necessary to properly protect employees from the risk of violence or harassment, or when recommended by the joint health and safety committee, as applicable. This policy and program will be reviewed after any harassment or violence incidents to determine if changes are necessary.
- 16.2 This policy will be reviewed with the joint health and safety committee.

17. TRAINING ON VIOLENCE AND HARASSMENT

- 17.1 The Town of Gibbons will provide employees with instruction and training on the contents of this policy and the procedures contained within for complaints and investigations.
- 17.2 Employees will also be trained in the hazards of workplace violence and harassment that may be present at the workplace including:
 - 17.2.1 the recognition of violence and harassment

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

17.2.2 the policies, procedures, and workplace arrangements that [Organization Name] has developed and implemented to eliminate or control the hazards of violence and harassment

17.2.3 the appropriate response to violence and harassment, including how to obtain assistance

17.2.4 the procedures for reporting, investigating, and documenting incidents of violence and harassment

18. INVESTIGATION PROCEDURE

18.1 The investigation process will be initiated upon receipt of a formal complaint from an employee or at the discretion of the employer where workplace violence is known or is suspected to be occurring.

18.2 The organization will endeavour to complete investigations within 90 calendar days or less once the process has been initiated; unless extenuating circumstances warrant a longer investigation (for example where more than five witnesses must be interviewed or in the event a witness, Complainant or Respondent is unavailable due to illness).


18.3 Once initiated, the investigation procedure will generally adhere to the following steps/guidelines:

18.3.1 The organization will appoint an internal or external investigator(s) to promptly conduct and document an investigation into the incident in which all facts are examined in a manner that is timely, fair, and impartial.


18.3.1.1 No person shall be appointed to the role of investigator where they have been named within a complaint.

18.3.1.2 Any allegations against the CAO will be investigated by a neutral third-party investigator.

18.4 The investigator(s) will review this policy, the submitted complaint and supporting documents, and will meet with the Complainant to gather additional details and information regarding the incident(s).

	TOWN OF GIBBONS Policy	WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

- 18.5 Individual(s) named in the complaint (known as Respondents) will be advised via written notification of the complaint that has been filed against them. The notification will inform the Respondent of the alleged offensive action(s)/behaviour(s) made against them.
- 18.6 The investigator will then meet with the Respondent to allow the individual to respond to the presented allegations and to gather facts and information.
- 18.7 Where warranted, the organization may issue a paid administrative leave to the Respondent, Complainant and any other party deemed necessary until the investigation is completed.
- 18.8 Employees on paid administrative leave pending the results of the investigation must remain available to meet with the investigator and to return to work as requested.
- 18.9 The investigator may also individually meet with witnesses, and any other individual deemed necessary to provide additional evidence or context/information pertinent to the investigation.
- 18.10 Once the investigator is satisfied with the amount of information collected from all parties, they will decide as to whether the allegation(s) are substantiated based on a balance of probabilities and, where substantiated, make recommendations on any remedial action to be taken.
- 18.11 The investigator will provide an investigation report which must include a summary of the steps taken during the investigation, the complaint and allegations of the Complainant, the response from the Respondent(s), the evidence of any witnesses, any additional evidence gathered, findings of fact, the conclusion of the investigation and any recommendations made.
- 18.12 If the investigator deems a breach of the policy has occurred, the organization will take necessary corrective action were deemed appropriate to do so.
- 18.13 If the results of the investigation do not substantiate that a breach of this policy has occurred, the allegations will be disregarded in any subsequent employment decision affecting the parties involved. This is the case except where there is a repetition of the same allegation from the same or different parties, and in that case, further investigation and corrective action may occur. However, if after investigating any complaint, the organization determines that the complaint is not genuine or that an employee has deliberately provided false information regarding the complaint, disciplinary action may be taken against the Complainant or the individual who gave the false information.
- 18.14 If the Complainant disagrees with the outcome of the investigation, they will have the option to pursue recourse through the applicable legislation (example: The Human Rights Code or the Occupational Health and Safety Act).

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

18.15 The Town of Gibbons will provide the Complainant and Respondent (where the Respondent is an employee) with a written outcome letter summarizing the investigation findings and any disciplinary action to be taken because of the investigation.

18.16 All parties involved in the investigation process, including the Complainants, Respondents, and witnesses, are responsible for fully cooperating with the investigator(s) throughout the investigation process.

19. BREACHES OF POLICY

19.1 Any employee of The Town of Gibbons who is found to have breached this policy by engaging in violence or a form of reprisal; who breaches confidentiality expectations; fails to cooperate with an investigation; makes a complaint in bad faith or supplies falsified information will be subject to appropriate disciplinary action.

19.2 Disciplinary action may range from training, counselling, written warning, suspension, work transfer and termination of employment, depending on individual circumstances. Additionally, the organization may pursue criminal charges where warranted.

20. DISCIPLINARY ACTION

20.1 Any employee who is found to have breached this policy by engaging in violence or a form of reprisal; who breaches confidentiality expectations; fails to cooperate with an investigation; makes a complaint in bad faith, or supplies falsified information will be subject to appropriate disciplinary action.

20.2 Disciplinary action may range from training, counselling, written warning, suspension, work transfer and termination of employment, depending on individual circumstances. Additionally, the organization may pursue criminal charges where warranted.


21. RECORD KEEPING

21.1 The Town of Gibbons will securely retain records of all complaints or incidents of harassment including copies of:

21.1.1 The complaint or details about the incident

21.1.2 Records of the investigation, including notes

21.1.3 Witness statements, if taken

			
TOWN OF GIBBONS Policy		WORKPLACE HARASSMENT POLICY AND PROCEDURE	
POLICY TYPE Personnel	DATE APPROVED May 14, 2025	RESOLUTION 25.225	POLICY # PP 1-25

21.1.4 The investigation report, if any

21.1.5 Results of the investigation that were provided to the Complaint and Respondent

21.1.6 Any corrective action is taken to address the complaint or incident of workplace harassment

22. REPORTS OF VIOLENT INCIDENTS - WORKPLACE EXPECTATIONS

22.1 The Organization Shall:

22.1.1 Promptly investigate all reported acts and incidents of violence.

22.1.2 Consult with other parties (i.e., legal counsel, Health and Safety Consultants, Health and Safety Representatives, Employee Assistance Providers, Human Rights, and local Police Services) as deemed necessary to address, resolve and mitigate incidents.

22.1.3 Take all reasonable measures to identify and eliminate risks and root causes resulting from the incident.

22.1.4 Comply with all reporting requirements under occupational health and safety regulations.

SUPERCEDES POLICY PP 1-19

LEGISLATION

Alberta Human Rights Act

Occupational Health & Safety Act

Occupational Health & Safety Code

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Acting Mayor Dale Yushchyshyn

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Interim CAO Eric Lowe