

Theme Policy for Reporting Misconduct and Situations Involving Discrimination or Harassment	Effective YYYY-MM-DD 2024-11-30
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Adoption

Resolution No. Resolution number	Adopted on YYYY-MM-DD 2022-09-23	Revised YYYY-MM-DD 2025-06-12	Secretary General Stéphanie Assouline, Acting Vice President – Corporate, Legal and Regulatory Affairs and Chief Governance Officer
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1. DEFINITIONS

In this policy, the following terms have the meaning assigned to them below:

wrongdoing	<p>An act is considered a wrongdoing if it is:</p> <ul style="list-style-type: none"> a) a violation of any law or regulation applicable in Québec b) a serious breach of the standards of ethics and professional conduct c) a misuse of funds or property belonging to Hydro-Québec, including the funds or property it manages or holds for others d) gross mismanagement within Hydro-Québec, including abuse of authority e) any act or omission that seriously compromises or that may seriously compromise a person's health or safety or the environment f) advising or ordering a person to commit an act referred to in paragraphs a) to e) above <p>A wrongdoing includes acts committed or about to be committed by a Hydro-Québec employee or director in the performance of their duties, or by any other person, partnership, group or other entity as part of an adjudication or awarding of a Hydro-Québec contract, or in the performance of such a contract, including the granting of financial assistance.</p>
discrimination	<p>Intentional or unintentional distinction, exclusion or preference for any of the reasons set out in the <i>Charter of Human Rights and Freedoms</i> (race, colour, sex, sexual orientation, gender identity or expression, pregnancy, marital status, age (except as provided for by law), religion, political convictions, language, ethnic or national origin, social condition, disability or the use of a means to remedy that disability) and which has the effect of destroying or compromising a right.</p>
harassment	<p>Distressing behaviour in the form of repeated and hostile or unwanted conduct, words, actions or gestures that affect the victim's dignity or psychological or physical integrity and results in a harmful work environment for them. Harassment also includes such behaviour in the form of such words, actions or gestures of a sexual nature. A single serious instance of this type of conduct can also constitute harassment if it causes such harm and has a continuing harmful effect on the victim.</p>
misconduct	<p>Any violation of the codes of ethics that apply to Hydro-Québec's employees or directors or any violation of the <i>Supplier Code of Conduct</i> committed or about to be committed concerning Hydro-Québec's activities.</p> <p>For the purposes of this policy, misconduct excludes a situation of harassment or discrimination.</p>
Ethics and Integrity Officer	<p>Person appointed by the President and Chief Executive Officer as being responsible for managing ethics and integrity in accordance with the <i>Act to facilitate the disclosure of wrongdoings related to public bodies</i>, as well as any other legislative provisions amending it from time to time, pursuant to the appointment notice signed on June 12, 2024.</p>
reprisal	<p>Any adverse action or threat of adverse action against a person, such as a transfer, suspension, demotion, dismissal or termination of their internship, and any disciplinary action or interference with a person's employment, working conditions or internship, including discriminatory measures, or imposing any other sanctions because that person exercised a mechanism set out in this policy.</p>
reporting	<p>The act of communicating information, in good faith, about misconduct or a situation of discrimination or harassment that a person has allegedly a) committed, b) asked a third party to commit, c) intends to commit, or d) intends to ask a third party to commit.</p>
disclosure	<p>The act of communicating information to the Protecteur du citoyen [Public Protector] that may demonstrate that a wrongdoing involving Hydro-Québec was committed or is about to be committed.</p>

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2. OBJECTIVES

In order to preserve trust in Hydro-Québec and maintain high standards of integrity and ethics, Hydro-Québec's Board of Directors and management make available to everyone a service for reporting misconduct and situations involving discrimination or harassment.

The reporting service also helps identify ways to improve Hydro-Québec's processes, practices and guidelines.

The objectives of this policy are to ensure that action is taken and that sanctions are applied, if applicable, following an audit or investigation conducted as a result of a report or complaint of discrimination or harassment, when it is proven to be well founded. It also aims to establish a protection regime against reprisals for the persons involved in a case opened under this policy.

This policy also aims to promote the disclosure of wrongdoings in accordance with the *Act to facilitate the disclosure of wrongdoings relating to public bodies* and the protection regime against reprisals pursuant to the *Act respecting protection against reprisals related to the disclosure of wrongdoings*.

Finally, this policy is part of Hydro-Québec's commitment to adopting and promoting a responsible, integrated approach based on the principles of the *United Nations Global Compact*, to which it is a signatory.

3. REPORTING AND DISCLOSURES

a. Misconduct

i. Reporting

Anyone can report misconduct by telephone or online, at any time:

- 1 866 384-4783 (toll-free number)
- [Secure online form](#)

Situations can be reported anonymously to Hydro-Québec. Hydro-Québec is committed to taking all measures necessary to ensure that the identity of the person making the report or cooperating in an audit or investigation conducted further to a report remains confidential.

Reporting under this provision will be handled in accordance with the standard *Norme de traitement des signalements d'inconduite* [Handling of Misconduct Reports].

ii. Protection against reprisals

1. Prohibition against reprisals

It is prohibited to retaliate against a person because they:

- a) made a report or filed a complaint.
- b) cooperated in an audit or investigation conducted further to a report or complaint.

It is also prohibited for anyone to threaten a person with reprisals to prevent them from reporting a situation, filing a complaint or cooperating in an audit or investigation.

2. Recourse against reprisals

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Any person who believes they are the victim of reprisals can contact the Ethics and Integrity Officer, who is responsible for taking the necessary steps to ensure that appropriate protection measures are put in place. In a timely manner and when applicable, the Ethics and Integrity Officer reminds the persons involved in the case or cooperating in an audit or investigation about the time limit for seeking recourse under the *Act respecting labour standards*.

Employees or managerial personnel who believe they are a victim of a prohibited practice under section 122 of the *Act respecting labour standards* must exercise their recourse with the Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST) [Québec's workplace health, safety and equity board] within 45 days following the complaint. Recourses available to unionized personnel depend on the applicable provisions of their collective agreement.

b. Wrongdoing

i. Disclosure

Any person can, in the public interest and at any time, disclose information to the [Protecteur du citoyen](#) that may demonstrate that a wrongdoing (as defined above) involving Hydro-Québec was committed or is about to be committed. Disclosures filed with the Protecteur du citoyen are handled in accordance with the procedure it has established, and they can be filed anonymously.

The contact information for the Protecteur du citoyen's Direction des enquêtes sur les divulgations en matière d'intégrité publique is as follows:

Direction des enquêtes sur les divulgations en matière d'intégrité publique
Protecteur du citoyen

800, place D'Youville, 18e étage, Québec (Québec) G1R 3P4

Phone:

1 800 463-5070 (toll free in Québec)
418 643-2688 (Québec City region)

Fax:

1 844 375-5758 (toll free in Québec)
418 692-5758 (Québec City region)

Secure online forms:

[Form – Disclosing wrongdoing | Protecteur du citoyen](#)

ii. Obligation to cooperate

Every person is required to cooperate fully in the audits and investigations of the Protecteur du citoyen.

It is prohibited for anyone to obstruct or attempt to obstruct the handling of disclosures, for example, by providing false or misleading information or by refusing to provide or by destroying a document that is relevant to an audit or investigation conducted by the Protecteur du citoyen.

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iii. Confidentiality

As liaison officer with the Protecteur du citoyen, the Ethics and Integrity Officer implements all necessary measures to ensure the confidentiality of information brought to their attention in that capacity.

Anyone cooperating in the audits or investigations conducted by the Protecteur du citoyen must maintain the confidentiality of the information brought to their attention in this regard.

iv. Protection against reprisals

1. Prohibition against reprisals

It is prohibited to retaliate against a person because they:

- a) made a disclosure.
- b) cooperated in an audit or investigation conducted further to a report or complaint.
- c) exercised a right under the *Act respecting protection against reprisals related to the disclosure of wrongdoings* or the *Act to facilitate the disclosure of wrongdoings related to public bodies*.
- d) advised a person to make a disclosure or exercise a right under the *Act respecting protection against reprisals related to the disclosure of wrongdoings* or the *Act to facilitate the disclosure of wrongdoings related to public bodies*, encouraged them to do so or provided them with information about these possibilities.
- e) have personal or family connections with someone who made a disclosure or exercised a right under the *Act respecting protection against reprisals related to the disclosure of wrongdoings* or the *Act to facilitate the disclosure of wrongdoings related to public bodies*.

It is also prohibited to threaten a person with reprisals in an attempt to prevent them from making a disclosure, cooperating in an audit or investigation, or exercising a right under the *Act respecting protection against reprisals related to the disclosure of wrongdoings*.

2. Recourse against reprisals

Anyone who believes they are the victim of reprisals can file a complaint with the [Protecteur du citoyen](#) within 90 days of learning about these reprisals or threats of reprisals.

The Protecteur du citoyen can, with the parties' agreement, appoint a mediator to attempt to settle the complaint. If the parties refuse mediation or if no settlement has been reached by the end of the mediation, the Protecteur du citoyen can represent the complainant regarding the exercise of the appropriate recourse in court or, with the complainant's authorization, conduct an audit or investigation to determine whether the complaint is well founded and make appropriate recommendations to Hydro-Québec's President and Chief Executive Officer.

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c. Discrimination and harassment

The Hydro-Québec standard *Milieu de travail sain et exempt de discrimination et harcèlement* [Healthy Work Environment Free from Discrimination and Harassment] details the process for handling situations involving discrimination and harassment.

i. Reporting

Any person who witnesses a situation of discrimination or harassment (or a situation that could become one of discrimination or harassment) involving Hydro-Québec employees in the performance of their duties or third parties with whom Hydro-Québec employees are required to interact as part of their duties can disclose the situation to Hydro-Québec by reporting it.

Situations involving discrimination or harassment can be reported by telephone or online at any time:

- 1 866 384-4783 (toll-free number)
- [Secure online form](#)

The reporting of a situation will be handled in accordance with the procedure set out in the standard *Milieu de travail sain et exempt de discrimination et de harcèlement* [Healthy Work Environment Free from Discrimination and Harassment].

ii. Complaint

A Hydro-Québec employee who believes they are a victim of discrimination or harassment can file a formal complaint to initiate the complaint handling procedure involving discrimination or harassment provided in the standard *Milieu de travail sain et exempt de discrimination et de harcèlement* [Healthy Work Environment Free from Discrimination and Harassment]. To do this, the person wishing to file a formal complaint can call 1 866 384-4783 or fill out the *secure online form* at any time. In such a case, the file is assigned to an outside firm responsible for examining the validity of the complaint and, where applicable, conducting the investigation.

4. MAIN ROLES AND RESPONSIBILITIES

Ethics and Integrity Officer Hydro-Québec's Ethics and Integrity Officer is Ms. Karine Charest 514 707-4427	<ul style="list-style-type: none"> • Encourages proactive reporting of potentially prejudicial situations for Hydro-Québec; • Ensures that this policy and the standards <i>Norme de traitement des signalements d'inconduite</i> [Handling of Misconduct Reports] and <i>Milieu de travail sain et exempt de discrimination et de harcèlement</i> [Healthy Work Environment Free from Discrimination and Harassment] are applied in accordance with all applicable laws; • Coordinates and implements measures to prevent wrongdoings and misconduct, and reprisals or threats of reprisals; • Is responsible for the application and dissemination of this policy; • Documents the information required for Hydro-Québec's accountability obligations on the application of this policy; • Informs Hydro-Québec's employees about the possibility of making a disclosure under the <i>Act to facilitate the disclosure of wrongdoings relating to public bodies</i> and protection against reprisals under the <i>Act respecting protection against reprisals related to the disclosure of wrongdoings</i>;
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	<ul style="list-style-type: none"> Promotes the services and tools provided by the Protecteur du citoyen; Acts as a liaison officer when an audit or investigation is conducted for the purposes of the <i>Act to facilitate the disclosure of wrongdoings relating to public bodies</i> and the <i>Act respecting protection against reprisals related to the disclosure of wrongdoings</i>; and Acts as the primary contact with the Secrétariat du Conseil du trésor [Treasury Board Secretariat] regarding the application of the <i>Directive concernant les responsables de la gestion de l'éthique et de l'intégrité</i> [Directive That Concerns Officers Responsible for Managing Ethics and Integrity].
Executive Vice-President – Strategy and Finance	<ul style="list-style-type: none"> Applies the <i>Standard for Handling Breaches of Hydro-Québec's Supplier Code of Conduct</i>.
Executive Vice-President – Internal Audit	<ul style="list-style-type: none"> Is responsible for cases that, had it not been for a conflict of interest or apparent conflict of interest, would have been handled by the persons responsible for such matters. This person applies the <i>Procédure interne pour le traitement des signalements d'inconduites requérant l'indépendance du groupe d'Audit interne</i> [Internal Procedure for Handling Reporting of Misconduct Requiring the Independence of the Internal Audit Group] in these cases.

5. CONFIDENTIALITY

Hydro-Québec is committed to taking all necessary measures to ensure the confidentiality of the information conveyed.

Confidential handling means that only those who need to know the information in the context of their duties are authorized to access it, where such access does not compromise the independence and integrity of the process.

6. OBLIGATION TO COOPERATE

Every person must cooperate fully in the context of the reporting of a situation, a complaint, audit or administrative investigation.

It is prohibited for anyone to obstruct or attempt to obstruct the handling of reports or complaints, for example, by providing false or misleading information or by refusing to provide or by destroying a document that is relevant to an audit or investigation.

7. SANCTIONS AND RECOURSSES

Any person who commits misconduct or causes a harassment or discrimination situation that is determined to be well founded following an investigation, who commits or threatens reprisals or who contravenes this policy may be subject to administrative or disciplinary measures up to and including dismissal. They may also be subject to legal proceedings (civil, penal or criminal). Depending on the case, these measures will be implemented in accordance with applicable laws, regulations and guidelines, as well as with collective agreements or other agreements in effect establishing the working conditions of the Hydro-Québec employee.

Similarly, a supplier, partner or external third party who commits misconduct or causes a harassment or discrimination situation that is determined to be well founded following an investigation or who contravenes this policy may be subject to the sanctions and recourses set out in the agreement between them and Hydro-Québec, in the applicable legislation and regulations or in Hydro-Québec's guidelines in this regard, including the *Procedure for Handling Breaches of Hydro-Québec's Supplier Code of Conduct*.

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8. ACCOUNTABILITY REPORT

The DACG submits an accountability report:

- at least each semester to the audit committee of Hydro-Québec's Board of Directors on the reporting of situations;
- at least once a year to the human resources committee of Hydro-Québec's Board of Directors, jointly with the Vice-présidence principale – Talents et développement organisationnel [Office of the Senior Vice-President – Talent and Organizational Development], on the reporting of situations of discrimination or harassment.

The anonymity of any person who has reported a situation and of any person who has cooperated in the audit or investigation, as well as the confidentiality of their identity, must be preserved at all times, including after the audit or investigation.

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APPENDIX – Legal Requirements and Hydro-Québec Guidelines

This Policy is based primarily on the following:

- the *Act to facilitate the disclosure of wrongdoings relating to public bodies*
- the *Act respecting protection against reprisals related to the disclosure of wrongdoings*
- the *Anti-Corruption Act*
- the *Act respecting labour standards*
- the *Act to prevent and fight psychological harassment and sexual violence in the workplace*
- *ISO Standard 37001: 2025* (and all subsequent versions)
- the following Hydro-Québec guidelines:
 - *Code of Ethics for Hydro-Québec employees*
 - *Code d'éthique et de déontologie du Conseil d'administration et de la direction d'Hydro-Québec et de ses filiales* [Code of Ethics and Rules of Professional Conduct for the Directors and Executives of Hydro-Québec and Its Subsidiaries]
 - *Regulation respecting the ethics and professional conduct of public office holders*
 - *Supplier Code of Conduct*
 - *Politique sur la lutte contre la corruption* [Anti-corruption Policy] [in French only]
 - *Standard for handling breaches of the Supplier Code of Conduct*
 - the standard *Milieu de travail sain et exempt de discrimination et harcèlement* [Healthy Work Environment Free from Discrimination and Harassment] [in French only]
 - the standard *Traitemet des signalements d'inconduite* [Handling of Misconduct Reports] [in French only]
 - *Procédure interne pour le traitement des signalements d'inconduites requérant l'indépendance du groupe d'Audit interne* [Internal Procedure for Handling Reporting of Misconduct Requiring the Independence of the Internal Audit Group] [in French only]