

JIM PATTISON BROADCAST GROUP LP

EMPLOYMENT EQUITY PLAN - ADOPTED AUGUST 2013

Preface

The first goal in the Jim Pattison Broadcast Group's (the "Company") Employment Equity Plan (the "Plan") is "to recruit and retain a diverse group of exceptionally talented staff and to support them in ways that allow them to reach their highest potential." The Company's Plan focuses on goals and objectives to attain employment equity consistent with our Employment Equity Policy adopted by the Company in May, 2004, which was restated in the Company's first Employment Equity Plan adopted in August, 2008 which commitment continues today and which states as follows:

The Jim Pattison Broadcast Group is federally regulated and as such is governed by the *Employment Equity Act*. As a standard, the Company is determined to treat all employees equitably.

The government created the Employment Equity Act to address disparities in salaries, occupations, career patterns, unemployment and labour force participation rates in the experiences of women, Aboriginal peoples, persons with disabilities and members of visible minorities.

The Employment Equity Act ensures that no one is denied employment opportunities and benefits for reasons unrelated to ability. The Act states that this is achieved by correcting disadvantages in the workplace experienced by the four designated groups mentioned previously. It is also achieved by implementing the principle that employment equity means more than treating people in the same way but also requires special measures and the accommodation of differences.

The Act is designed so that the outcome of its implementation is an equitable representation of women, Aboriginal peoples, persons with disabilities and members of visible minorities in workplaces across Canada. Employers are expected through an analysis of their workforce and employment policies and practices to develop employment equity plans. The plans include the elimination of employment barriers and special measures to enhance employment opportunities for members of the four designated groups.

When a division of the JPBG is posting a job opening, it is a commitment of our employment equity initiatives that all in-house postings, outside ads for recruitment, etc. be tagged with:

"As part of the Jim Pattison Broadcast Group's Employment Equity Policy we encourage women, Aboriginal peoples, persons with disabilities and members of visible minorities to identify themselves as this may be to their advantage in helping us correct under-representation of those groups in our company."

Please ensure everyone is informed of this requirement as it is an initiative we must adhere to.

The Company recognizes that it will benefit from a workforce that reflects the rich diversity of Canadian society. Excellence is not limited to one or even a few groups. By becoming more inclusive and supportive of diversity we can draw on a wide field of excellence from within and across all diverse groups in Canada. One of the Company's guiding values and principles is a commitment to equal rights and dignity of all persons, and equity in opportunities and employment for all.

The Company is committed to fair employment practices for all employees. The Company has established an employment equity program in order to identify and remove barriers to equity in employment for members of designated groups. In addition, the Company will endeavour to create an inclusive and welcoming environment for members of any group protected by the Human Rights Code.

Merit is paramount. Instituting Equity helps to fully recognize merit. Employment equity focuses on results and works within a framework of inclusion, respect and a climate free of discriminatory barriers to support merit. Allowing intentional or unintentional employment barriers is at odds with the merit principle. Ensuring principles of fairness and equity are incorporated into all procedures and activities will result in equitable access to employment opportunities and a workforce reflective of the diverse population of the appropriate community.

Achieving equity is not possible until equity goals and initiatives are integrated into the normal processes and practices of the workplace and seen as a standard way of operating. The responsibility for achieving equity rests with all who make employment decisions and take action that affect the workplace. Accountability for achieving equity is, therefore, no different from accountability for achieving other company goals and objectives. Monitoring and regular reporting will be a normal part of the Plan.

The *Employment Equity Act* speaks of two types of equity goals: "positive policies and practices" and "numerical goals." Both these qualitative and quantitative goals are necessary to achieve equity. The Company's Plan focuses on 3 areas: to establish a structure within which equity measures will be developed and monitored (Goal 1 and objectives), to increase representation and assist retention of designated groups (Goal 2 and objectives), and to promote integration activities to create an inclusive climate and support productivity (Goal 3 and objectives).

This Plan is in effect from September 1, 2013 to August 31, 2015. It is the intention that the objectives of this Plan are to be carried on after 2015, and that employment equity will always be a part of the Company's policies.

The objectives in this Plan have existed since our Employment Equity Policy was adopted in May, 2004 and are ongoing objectives of the Company.

Goal 1:

To ensure the principles of fairness and equity are and continue to be incorporated into all aspects of employment including, recruitment and hiring, training and promotion, retention and accommodation in the workforce.

The work towards achievement of this goal has been ongoing.

- **Objective 1:** Continue to integrate equity goals and objectives into the Company's planning processes.
 - Equity goals and objectives are integrated in the regular goals and objectives for individuals. There must be mechanisms in place to hold individuals accountable for meeting these goals.
 - There will be consultation process in developing goals and objectives to ensure inclusion and involvement at all levels.
 - Responsibility:
 - President: to expect the Vice-Presidents and General Managers to include equity goals and objectives as part of the regular planning and review process and support the steps necessary to achieve them as part of the Company's quarterly reviews.
 - Vice Presidents, General Managers and Employment Equity Committee: to include equity goals as part of their regular planning and review process and to take steps necessary to achieve them.

- **Objective 2:** Continue to systematically review policies and procedures and identify any barriers to members of designated groups.
 - A barrier is any policy, procedure, or practice that has a direct or indirect adverse effect on members of designated groups. Within that context, an employer will remove barriers unless it would cause undue hardship. Employers will continue to hire based on merit.
 - Responsibility:
 - President: to review all new policies and procedures. The President will ensure that the Employment Equity Committee as well as General Managers and Vice Presidents continue to review all new human resources policies and procedures and all substantial changes proposed for existing policies and procedures prior to review by the President.

- All those responsible for drafting policy: to apply an equity checklist to new policy provisions and review of existing policies. The checklist is attached as Schedule A to this Plan.

- **Objective 3:** The Company will regularly monitor progress of the Plan through review and update of the EECRS data every year. In August of 2014 a review of the status of the Plan is to be conducted in consultation with the Employment Equity Committee.
 - Responsibility:
 - President, Vice Presidents: to review EECR results every year in consultation with the Employment Equity Committee.
 - General Managers: to support and identify appropriate measurements.

- **Objective 4:** To consider and review positive incentives on an ongoing basis to encourage the implementation and achievement of equity goals and objectives.
 - Responsibility: President, Vice Presidents, General Managers and Employment Equity Committee.

Goal 2:

To improve the participation of members of designated groups in all jobs and at all levels where they are under-represented, and achieve and retain a workforce representative of the appropriate community.

- **Objective 1:** Adopt 3 year numerical hiring goals, based on estimated retirement data, current representation of designated groups, and the prospects for hiring members of designated groups in specified occupational groups where they are under-represented.
 - A hiring goal is not a quota, but serves as a comparator against which to measure the success of recruitment and selection strategies.
 - Hiring goals are the numbers of designated group members considered appropriate to hire in a specific occupational category over a 3 year period in order to increase their representation in our workforce.
 - To implement this objective the task is to look at areas of under-representation, anticipate hiring opportunities, set reasonable, specific numerical goals to increase representation and establish strategies that will assist in recruiting and selecting designated group members.

- Responsibility:
 - President, Vice Presidents: to review and consider annual company wide hiring goals and objectives in each year of the Plan.
 - General Managers: to establish and adopt hiring goals, for the President's approval, as part of the annual goals and objectives planning process; to revise and update these as necessary as suggested by new trends.
- The short term goal of the Company is to, within a time frame period of one to three years, continue to work to bridge all of the gaps identified in the four designated groups where the gap is -1 or -2 and fill the gap where it is -3 or greater, as determined by the August 2013 EE Goal Setting Reports as generated by the WEIMS software by designated group based on the number of employees as at August 2013. The gaps identified for the Jim Pattison Broadcast Group are:

Jim Pattison Industries Ltd.

Three Year Goal Setting Report: August 2013

Occupational Group	Women			
	Hires Required	3 Year Goal	Present Gap	Projected Gap
Senior Managers	3	1	(3)	(2)
Middle and Other Managers	8	5	(6)	(3)
Clerical Personnel	16	15	(1)	(1)
	27	21	(10)	(6)

Occupational Group	Aboriginal Peoples			
	Hires Required	3 Year Goal	Present Gap	Projected Gap
Semi-Professionals and Technicians	13	10	(10)	(3)
Intermediate Sales and Service Personnel	2	1	(1)	(1)
	15	11	(11)	(4)

Occupational Group	Visible Minorities			
	Hires Required	3 Year Goal	Present Gap	Projected Gap
Senior Managers	2	0	(2)	(2)
Middle and Other Managers	4	2	(4)	(2)
Semi-Professionals and Technicians	35	27	(25)	(8)
Supervisors	7	3	(6)	(4)
Clerical Personnel	8	4	(7)	(4)
Intermediate Sales and Service Personnel	14	8	(12)	(6)
	70	44	(56)	(26)

Occupational Group	Persons with Disabilities			
	Hires Required	3 Year Goal	Present Gap	Projected Gap
Semi-Professionals and Technicians	9	9	(1)	0
Supervisors	3	1	(2)	(2)
Clerical Personnel	1	1	(1)	0
Intermediate Sales and Service Personnel	3	2	(2)	(1)
	16	13	(6)	(3)

➤ **Objective 2:** Continue to develop processes and strategies to implement hiring goals as appropriate. As part of this objective, all general managers will circulate best practices and processes which are utilized by individual stations to raise awareness amongst all stations in the Company as to successful initiatives. The best practices and process will be used to:

- raise awareness of Jim Pattison Broadcast Group as a potential employer among designated group members;
- work more closely with professional training schools/colleges to recruit designated group members;
- post jobs with local agencies having contacts with designated group members;
- post jobs outside the broadcast industry to attract members of designated groups;

- make managers aware of the importance of encouraging designated group members to self-identify; and
- establish more active partnerships with Aboriginal organizations.

For qualitative goals, the Company will continue to focus on the following:

- raise awareness of the career potential of the broadcast industry and the Company as an employer by sponsoring community events, contacting educational institutions where broadcasters are trained, holding (or participating in) career fairs, speaking at high schools;
 - raise awareness of the positive impact of the media in a community (and thus enhancing its image as a desirable career) through developing and airing special features related to designated group members;
 - post jobs with local community agencies involved in the placement of designated group members;
 - enhance outreach efforts by developing partnerships with Aboriginal organizations aimed at offering Aboriginal persons opportunities in the broadcast field and of recruiting qualified Aboriginal persons into existing positions; and
 - ensure managers receive training on employment equity, its importance to the Company, and the need to promote self-ID.
- Responsibility:
 - Vice Presidents, General Managers: to develop processes and strategies for the President's approval and to implement and review results as part of the annual planning process and to report on success employment equity initiatives to the management team.

➤ **Objective 3:** Provide training in equity selection procedures for hiring committees.

- Responsibility:
 - President, Vice Presidents: to raise awareness of employment equity principles amongst those responsible in the Company for hiring and to review training materials on employment equity principles for circulation by February, 2014.

- **Objective 4:** On a continuing basis, ensure that employees who are designated group members have equitable access to professional development opportunities.
 - Responsibility:
 - Vice Presidents and General Managers: to review appropriate strategies in consultation with the Employment Equity Committee by September, 2014.

- **Objective 5:** On an ongoing basis, continue to encourage an inclusive and welcoming work environment that supports the successful integration and retention of designated group members.
 - Responsibility:
 - President, Vice Presidents, General Managers: to continue to develop specific, practical strategies, e.g.
 - To continue to provide orientation and informal mentoring programs for new employees.
 - To continue to provide resources and opportunities for both formal and informal training on equity principles and issues for all employees on an ongoing basis during the term of the Plan.
 - All employees: to support an inclusive and welcoming work environment.

Goal 3:

To promote employment practices which advance equity and access for all.

- **Objective 1:** To continue to educate and orient managers and supervisors and all employees to the Company's employment equity commitments by publishing the Plan and any initiatives to all employees through posting the information at all stations..
 - Responsibility:
 - President, Vice Presidents, General Managers: to ensure communication occurs and new initiatives are implemented through the term of the Plan.
 - General Managers: to support the initiatives required and to facilitate and support the attendance of all supervisory staff through training and goal setting.

- **Objective 2:** To continue to incorporate equity and diversity training as a standard part of supervisory training for all those holding supervisory positions.
 - Responsibility:
 - President, Vice Presidents: to establish programs.
 - General Managers: to establish development plans which incorporate these programs.

- **Objective 3:** Continue identifying and implementing objectives and strategies in equity plans to achieve equity and report annually on equity progress and on goals for the coming year.
 - Responsibility: Employment Equity Committee and General Managers to whom these report; to annually review results of implementation and to set new objectives; to ensure that equity initiatives are reflected in other planning documents, e.g. business plans.

- **Objective 4:** Ensure there are systems in place for consultation and communication with the Company's employees and community, in particular designated group members in the community regarding the ongoing development of employment equity related policies and procedures.
 - Continue communication with employees and consultation and collaboration with employees' representatives on the preparation, implementation and revision of the Plan is required under the *Employment Equity Act* and will occur on an ongoing basis and annual reports will be posted at all Company stations.
 - In view of the fact that the implementation of this Plan will be enhanced by the participation of designated groups themselves, information should be disseminated as widely as possible to raise awareness of employment opportunities with the Company in the community.
 - Facilitate and encourage self-identification by both existing and potential employees by including self-identification elements in web based and hard copy job application materials as well as conduct self-identification surveys every two years to enable self-identification.
 - Responsibility:
 - President, Vice Presidents: to continue to participate in consultation and communication and to promote consultation and communication at the quarterly meetings of management.

- Vice-Presidents, General Managers: to determine at what point during the development of goals and objectives consultation and collaboration with employee groups and designated groups takes place.

The Plan will be in effect for 3 years. Each year, the Vice Presidents, General Managers and Employment Equity Committee will work with the President's office to prepare and disseminate an annual report on progress. At any point during the term of the Plan and particularly at the mid-term point in February, 2014, the President shall convene a meeting of the Vice Presidents, General Managers and Employment Equity Committee to review what steps can be taken to meet the goals and objectives of the Plan or alternatively, facilitate reaching consensus on amendments to the Plan which amendments shall be consistent with the spirit and intent of employment equity.

**SCHEDULE A
EQUITY CHECKLIST**

Human Resources Policies/Procedures Checklist			
<i>Adapted from Version 1.2 – September 2006 HRSDC, Labour Program</i>			
EEOG:	All Employees <input type="checkbox"/> or specify:		
Formal/Informal Policy/Procedure:			
Assessment Measures	Yes	No	Comments
Does it conform to human rights and employment laws?			
Is it applied consistently to all personnel?			
Does it impact unequally on designated group members?			
Does it accurately predict/evaluate performance?			
Is it necessary for the safe or efficient operation of business?			
Is it based on a bona fide occupational requirement?			
Is accommodation possible (individual)?			