



***Protection from reprisal.***  
***Your Right. Our Mission.***

**TERMS OF SETTLEMENT (Mediation)**

BETWEEN

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(Commissioner)

(Representative)

AND

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(Complainant)

(Representative)

AND

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(Employer)

(Representative)

AND

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(Individual Respondent)

(Representative)

The parties have made the decision to use mediation to resolve the application in file n° *[file number]* submitted by the Commissioner concerning *[subject]*. The parties acknowledge that all aspects of this matter have been resolved to their satisfaction as per the terms below. The Commissioner is satisfied that the public interest is respected.

The parties agree to the following terms of settlement without admitting to any liability:

The Employer, without prejudice to any position it may wish to take in future cases involving similar matters or circumstances, hereby agrees:

1. to;
2. to;

3. to;

The individual respondent hereby agrees:

4. to;
5. to;
6. to;

The Commissioner hereby agrees:

7. to withdraw the application filed on *[date]* ;
8. to;
9. to;

The Complainant hereby agrees:

10. to the withdrawal of the application filed on *[date]*;
11. to;

The Parties hereby agree:

12. to exonerate each other, their servants and representatives from all complaints, grievances, requests or other recourses arising from this dispute and discharge themselves from all monies owed.
13. that they have read, understand and accept all the terms and conditions of this settlement.
14. not to disclose the content of these terms of settlement and its specific conditions except to implement this settlement, by legal obligation, if a judicial authority orders its, or by consent of all parties.
15. a press release may be agreed upon to provide for parts of the settlement which the parties may disclose;

16. in the event that terms and conditions are inconsistent with any applicable legislation, these terms and conditions shall, to the extent of such inconsistency, be null and void.

17. that this agreement constitutes full and final settlement of the specific issues and conditions associated with the Commissioner's application and does not create a precedent.

AGREED IN

\_\_\_\_\_

ON

\_\_\_\_\_

(City and province)

(Date)

Name in block letters

Signature

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