

DISCRIMINATION AND HARASSMENT POLICY



Our commitment

ADCO is committed to providing a inclusive and diverse workplaces where every person is treated equitably, fairly and with respect. We aim to ensure the success of ADCO is enhanced by decisions that are based on merit and good working relationships.

This policy applies to all employees, contractors, temporary staff or personnel engaged by ADCO or at our workplaces (together, "Workers"). It also applies to our visitors.

ADCO aims to provide all Workers and our visitors with a workplace that is healthy, safe, and free from discrimination, harassment, bullying, victimisation, vilification, violence, including gendered violence, and any other conduct or behaviour which is not consistent with maintaining an inclusive and diverse workplace.

Discrimination, bullying, harassment, victimisation and vilification are unacceptable and unlawful under Commonwealth and State laws.

Our expectations

You must not engage in any unlawful discrimination, bullying, harassment, sexual harassment, sex-based harassment, violence, including gendered violence, or any other conduct which is not consistent with maintaining an inclusive and diverse workplace.

This policy applies to conduct at all ADCO workplaces, including conduct which takes place outside of ADCO's premises or normal business hours, such as on social media or at work events to the extent it is related to your employment or engagement with ADCO, or our operations.

Unlawful discrimination can occur on the basis of, among other things, race, ethnicity, religion, political opinion, national origin, sex, sexual preference, age, physical or mental disability, marital status and family or carer's responsibilities. Both direct and indirect discrimination is unlawful and unacceptable at our workplaces.

Workplace bullying is repeated and unreasonable behaviour directed toward a Worker or group of Workers, that creates a risk to health and safety. Reasonable management action carried out lawfully and in a reasonable manner is not bullying.

Unlawful harassment may include any type of unwelcome behaviour that offends, insults, humiliates or intimidates another person in the workplace based on a particular attribute where a reasonable person in the circumstances would

have anticipated that the behaviour might offend, insult, humiliate or intimidate the harassed person. Unlawful harassment also includes sexual harassment and sex-based harassment.

Sexual harassment occurs where a person engages in unwelcome conduct of a sexual nature in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person exposed to the conduct would be offended, humiliated or intimidated.

Sex-based harassment is unwelcome conduct of a seriously demeaning nature by reason of another person's sex or gender.

ADCO supports its commitment to providing a healthy, safe and inclusive work environment, so far as reasonably practicable, by:

- promoting a workforce free from all forms of bullying, harassment and discrimination;
- maintaining a zero tolerance for such behaviours;
- investigating all reports or complaints of such behaviour confidentially, impartially and with victim sensitivity;
- ensuring managers make themselves available to receive and respond to issues raised;
- encouraging Workers and visitors to report incidents of discrimination, harassment, bullying or violence, so that responsible action can be taken to address the incident and eliminate such behaviour;
- providing our employees with access to our Employee Assistance Program;
- actively seeking to remove barriers that prevent the fair and equitable treatment of personnel; and
- demonstrating respect and fairness, free of any form of discrimination, in our interactions with external stakeholders, including clients, subcontractors, and visitors.

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How you can help

You are responsible for:

- behaving in a respectful and professional manner at all times;
- complying with this policy and not engaging in discrimination, harassment, bullying, victimisation or vilification of any kind;
- reporting unacceptable behaviours or conduct described in this policy;
- cooperating with investigations into allegations of such behaviour; and
- attending training regarding the matters in this policy.

Managers have an important role in modelling appropriate workplace conduct and in preventing inappropriate workplace behaviour. Managers must:

- model and reinforce the standards of workplace conduct required under this policy;
- raise awareness of ADCO's zero tolerance of conduct prohibited under this policy;
- take active steps to prevent and stop any inappropriate behaviour by a Worker; and
- take appropriate steps to resolve any complaint about inappropriate behaviour by a Worker.

Reporting breaches

Where you believe that a breach of this policy may have occurred, ADCO strongly encourages you to report the matter to your Manager, if you feel comfortable to do so.

Alternatively you may report a breach to our:

- State Manager; or
- Head of Corporate Affairs,

details for whom are published on our website.

All reports will be dealt with confidentially, in a timely and victim sensitive manner, and in accordance with our Grievance Policy, if appropriate.

Breaches of this policy create a safety risk and will be taken seriously

If you breach this policy by engaging in any engaging in discrimination, bullying, harassment, victimisation or vilifying conduct, you may be subject to disciplinary action, including the termination of employment or engagement. This extends to any activity which aids or encourages such behaviour by another person.

This policy does not form part of your contract of employment or engagement with ADCO or impose contractual obligations on ADCO.

ADCO may amend or vary this policy, in its absolute discretion, from time to time.

Our contact

If you have any queries about this policy, please contact the relevant State Manager.

A blue ink signature of Neil Harding.

Neil Harding
Managing Director