

DISCRIMINATION, HARASSMENT AND BULLYING PREVENTION POLICY



Our commitment

ADCO is committed to providing a safe, healthy and inclusive work environment free from any form of Discrimination, Harassment, Sexual Harassment, Gender-Based Harassment, Bullying, Victimisation, Vilification or violence across its business. ADCO recognises and is committed to meeting its obligations under laws related to health and safety, sexual harassment, other forms of harassment, bullying, discrimination, human rights, equal opportunity and racial vilification.

Application

All Workers have the right to a working environment where everyone is treated fairly and with respect, dignity, and equality.

Conduct that is inconsistent with this policy will be subject to management action which may include disciplinary action up to and including termination of employment (for ADCO employees) or termination of engagement (for ADCO's Trade Partners).

This policy applies to conduct at all ADCO workplaces, including conduct that 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 a Workers employment, engagement, or association with ADCO and its operations.

Definitions

Capitalised terms in this policy are defined in Procedure Discrimination, Harassment and Bullying Prevention.

Responsibility

All leaders, managers and supervisors of Workers at an ADCO workplace (including leaders, managers and supervisors of Trade Partners) have an obligation and responsibility to ensure a safe, healthy and inclusive work environment (including without limitation, in relation to Psychosocial Hazards and ADCO's Positive Duty). They must lead by example, promptly address any conduct or behaviour that is inconsistent with this policy and consult with ADCO Senior Management if they witness or receive a report of conduct inconsistent with this policy.

Consistent with ADCO's Positive Duty, leaders, managers and supervisors must take proactive steps to prevent

conduct inconsistent with this policy, including identifying and managing Psychosocial Hazards, and not merely responding to reports after conduct has occurred.

Leaders, managers and supervisors must immediately report any instances of Discrimination, Harassment, Sexual Harassment, Gender-Based Harassment, Bullying, Vilification, or Psychosocial Hazards to their line manager, an ADCO Connector or ADCO Senior Management.

All Workers must treat each other with courtesy, professionalism, respect and dignity and refrain from engaging in any conduct or behaviour inconsistent with this policy.

Workers must not engage in any form of Discrimination, Harassment, Sexual Harassment, Gender-Based Harassment, Bullying, Victimisation, Vilification or violence of any kind, or any other conduct which is inconsistent with maintaining an inclusive and diverse workplace.

Reporting

Any Worker who believes they have been subjected to any conduct inconsistent with this policy should report it to their line manager, an ADCO Connector or a member of ADCO Senior Management. A number of reporting options are available, including:

- Notification to an ADCO Connector identified on The Hub or at a specific workplace;
- Completion of a [Notification of an Issue](#) form available at ADCO projects and provide the completed form to Senior Management or anonymously via the project site mailbox; or
- Verbal or written notification to a line manager or a member of ADCO Senior Management.

Response

Reports of conduct inconsistent with this policy will be treated confidentially and will be managed in accordance with Procedure Discrimination, Harassment and Bullying Prevention.

ADCO prohibits victimisation of any person who reports conduct in accordance with this policy, or who participates in an investigation into such conduct.

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Any unauthorised disclosure of a report about inappropriate conduct or any acts of Victimisation may result in management action up to and including termination of employment (for ADCO employees) or termination of engagement (for Trade Partners).

Support

ADCO provides 24/7 confidential counselling, support and assistance through its [Employee Assistance Program](#) accessible via The Hub or Phone App to employees or their family members that may be impacted by conduct inconsistent with this policy.

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

- Providing workplace conduct training to address Psychosocial Hazards and unacceptable workplace conduct;
- Promoting a workforce free from all forms of unsafe and disrespectful conduct;
- Maintaining a zero tolerance for such conduct;
- Responding to all reports of such conduct confidentially, impartially and with sensitivity;
- Ensuring managers make themselves available to receive and respond to issues raised;
- Encouraging workers, Trade Partners and visitors to report instances of unacceptable workplace conduct and Psychosocial Hazards so that appropriate action can be taken;
- Providing ADCO employees with access to our Employee Assistance Program;
- Actively seeking to remove barriers that prevent the fair and equitable treatment of all personnel; and
- Demonstrating respect and fairness, free of any form of discrimination, in our interactions with external stakeholders, including Trade Partners and visitors.

Related Resources

- Procedure Discrimination, Harassment and Bullying Prevention
- Management System Health Safety Environment
- Grievance Policy
- Supplier Code of Conduct
- Diversity and Inclusion Policy
- Work, Health and Safety Policy

Our contact

Questions about this policy should be directed to the relevant ADCO line manager or State Manager.

Neil Harding
Managing Director