



RESPECTFUL WORKPLACE

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1.0 Policy Statement

Stanwell Corporation Limited (Stanwell) is an energy employer for **everyone**. We all have a right to a safe, respectful, and inclusive work environment that is free from workplace violence, sexual harassment, unlawful discrimination (including harassment), vilification, bullying and victimisation and where we receive a fair go.

Stanwell is committed to preventing unacceptable behaviour as a critical part of providing a safe and healthy working environment. We use our values of *We care* to guide our behaviour and make choices that create an environment where we all feel respected.

2.0 Purpose/Scope

This policy applies to everyone at Stanwell, including employees, directors, contractors and visitors (our **people**).

This policy sets out the behavioural standards required of our people in their interactions with each other or the broader community whilst undertaking activities that have a connection to Stanwell. These standards apply:

- in the workplace (including in or outside normal working hours);
- while working offsite (including hybrid work arrangements and working from home);
- during work activities (including training and travel);
- at work related events (including social and community activities); and
- where interactions are through technology such as e-mail, text messaging or social media (including the private use of such mediums if there is a sufficient connection to the workplace or other people at work).

Our people have a legal obligation to ensure that these standards and expectations are upheld.

This policy provides the framework for how we seek to prevent workplace violence, unlawful discrimination, harassment, sexual harassment, vilification, victimisation and bullying from occurring at Stanwell, and how we seek to ensure everyone receives a fair go in the workplace.

It also outlines what unacceptable behaviours are, how to report concerns, how we will respond, the consequences for breaching this policy and the support available. It should be read in conjunction with the Respectful Workplace Procedure.

Legal action can be taken against individuals in relation to some forms of unacceptable behaviour. Criminal charges, potentially resulting in fines or imprisonment, can be laid against individuals in relation to some forms of unacceptable behaviour, including under work health and safety laws. Furthermore, individuals may have liability for unlawful conduct (including unlawful discrimination or harassment) where they cause, request, instruct, induce, encourage, aid, assist, permit or otherwise authorise unlawful conduct. Stanwell may also be vicariously liable for unlawful sexual harassment or unlawful discrimination.

3.0 Content

3.1 What are unacceptable behaviours

Workplace violence, sexual harassment, unlawful discrimination (including harassment), vilification, bullying and victimisation are unacceptable at Stanwell and are unlawful under state and federal legislation.

The relevant legislation may vary from time to time, accordingly the examples and definitions in this Policy are non-exhaustive. The section below outlines the types of unacceptable behaviours that Stanwell does not tolerate.

(i) Workplace violence

Workplace violence is any incident where a person is abused, threatened or assaulted at the workplace or while they are carrying out work. Workplace violence covers a broad range of actions and behaviours that can cause short-term and long-term physical and/or psychological harm. Workplace violence can be one-off or repeated.

(ii) Sexual harassment

Sexual harassment is any unwelcome sexual advance, unwelcome request for sexual favours, or unwelcome conduct of a sexual nature where a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Sexual harassment may result from a single incident or a series of incidents.

Everyone can experience sexual harassment and it can occur between members of the same gender.

Where the behaviour is invited, consensual or reciprocated, it is not unlawful, however the behaviour should be in line with workplace conduct expectations. Furthermore, simply because a person is in a consensual relationship or maintains a friendship with another person does not mean that sexual behaviour will be consensual. Sexual behaviour which has not been consented to by a friend or partner may still be unlawful.

(iii) Unlawful discrimination

Unlawful discrimination occurs when a person is treated less favourably because of a particular attribute or personal characteristic (a protected attribute). It also occurs when a person is denied fair and equitable access to employment, training, development or advancement because of a protected attribute.

Protected attributes include: sex, relationship status, pregnancy, parental status, breastfeeding, age, race, impairment, religious belief or religious activity, political belief or activity, trade union or industrial activity, lawful sexual activity, gender identity, sexuality/sexual orientation, transgender status, gender expression, intersex, family/carer responsibilities, association with or in relation to a person identified on the basis of any protected attributes.

Racial discrimination is a form of unlawful discrimination. It occurs when a person is treated less favourably, or not given the same opportunities, as others in a similar situation, because of their race, skin colour, descent, national origin or ethnic origin or immigrant status.

The person's motive for discriminating is irrelevant, for instance, it does not have to be deliberate, conscious or planned, and it is not necessary that the person who discriminates considers the treatment as less favourable.

Discrimination can present in two ways:

- *Direct discrimination* happens if a person treats, or proposes to treat, a person on the basis of a protected attribute less favourably than another person without the attribute is or would be treated in similar circumstances. This will include harassment.
- *Indirect discrimination* happens where a rule, policy or practice applies to everyone but has the effect of being less favourable to persons with a protected attribute.

Treating people differently is sometimes necessary to make sure that everyone is being given equal opportunities, for example diversity targets. These situations can be considered as special measures and may not be considered as unlawful.

There can also be situations where there are legal exceptions to unlawful discrimination, for example genuine occupational requirements or where the employee cannot perform the inherent requirements of the position and there are no reasonable adjustments that can be made without unjustifiable hardship to Stanwell.

(iv) Harassment

Harassment is any form of behaviour that is unwelcome (not wanted) or uninvited (not asked for), a reasonable person would have anticipated would humiliate, offend or intimidate the person exposed to the behaviour and is based on a protected attribute as outlined above (for example, race, gender, sexuality, religion). It is a form of unlawful discrimination. Harassment can be verbal or physical and can be a one-off incident.

LGBTIQA+ status harassment is a form of harassment that targets an individual or group, based on sexuality or gender identity.

(v) Vilification

Vilification happens when someone says or does something in public that could cause other people to hate, to have serious contempt for or to severely ridicule individuals or groups because of their race, religion, sexuality or gender identity. Vilification is unlawful and in certain circumstances may be a criminal offence.

(vi) Bullying

Workplace bullying is repeated and unreasonable behaviour directed towards an individual or group that creates a risk to health and safety.

Repeated behaviour refers to the persistent nature of the behaviour and can involve a range of behaviours over time.

Unreasonable behaviour means behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

Health and safety includes physical and/or psychological health.

Bullying involves a repeated or a pattern of behaviour. Therefore, a single incident is not considered to be bullying. However, the behaviour may still be deemed inappropriate and could be subject to disciplinary action. It is also possible that workplace bullying can be directed at colleagues, at leaders or subordinates.

It is important to note that a single incident of bullying or repeated instances of bullying may also constitute unlawful harassment or discrimination when it relates to a protected attribute.

We want our people to be their best. Our leaders use regular coaching and feedback to provide our people with constructive feedback on their performance. They are empowered to make decisions about poor performance, take disciplinary action and direct and control the way work is carried out. Reasonable management action that is carried out in a reasonable way is not bullying.

At Stanwell, we demonstrate our value, *We adapt*, by embracing change and new ideas, working together and encouraging questions and different perspectives. Sometimes this will generate debate, discussion and disagreements. When these conversations are respectful they help us all grow and succeed. In this context, low level conflict and debate may not meet the definition of bullying.

(vii) Victimisation

Stanwell supports the right of our people to make a complaint under this policy without suffering victimisation, bullying, recrimination or detriment as a result.

It is unlawful to victimise a person because they have made or propose to make a complaint or provide information about unlawful discrimination, harassment or bullying or if they have tried to prevent or stop such behaviour.

Victimisation means to subject, or threaten to subject, another person to any detriment. It does not matter if the allegation is not pursued or a complaint is not made. It is also unlawful to victimise someone who is a witness or who is supporting an individual who intends to or has made a complaint. Victimisation is also sometimes called reprisal or adverse action.

3.2 Recognising unacceptable behaviours

Unacceptable behaviours can take many forms and can be viewed as a spectrum of behaviours, from mildly offensive to serious misconduct. Unacceptable behaviours can be verbal (things you say), behavioural (actions you take), physical (things you do) or through the use of technology.

Types of unacceptable behaviour	Examples	
Workplace violence	<ul style="list-style-type: none"> Physical assault such as hitting, scratching, kicking, grabbing, pushing and throwing objects 	<ul style="list-style-type: none"> Verbal threats and abuse Intentionally coughing or spitting on someone
Sexual harassment	<ul style="list-style-type: none"> Unwelcome comments or questions about a person's sex life Repeated and inappropriate invitations to drink, dinner or non-work related events Jokes of a sexual nature or about a person's sexual orientation or gender identity Sexual objectification of people Whistling, catcalling, honking Staring or leering Requesting intimate images/videos of someone 	<ul style="list-style-type: none"> Unwanted physical contact (including touching or fondling) Actual or attempted sexual assault or rape Sexually explicit or suggestive emails, SMS or social media (including the use of emojis with sexual connotations) Display of sexually graphic or degrading material including posters, cartoons, graffiti or messages left on desks or in common areas

Types of unacceptable behaviour	Examples	
Unlawful discrimination	<p style="text-align: center;"><i>Direct discrimination</i></p> <ul style="list-style-type: none"> • Not employing someone because of their age • Not allowing a person to join a workplace committee because of their gender • Harassing someone (see below) 	<p style="text-align: center;"><i>Indirect discrimination</i></p> <ul style="list-style-type: none"> • Having a policy which only promotes full time employees • Having a policy which does not consider the impact of religious beliefs on working hours
Racial discrimination	<ul style="list-style-type: none"> • Making racial slurs and remarks or generalised racial statements • Posting racially offensive cartoons, meme's or other images • Negatively commenting on a person's cultural heritage • Making racially based jokes 	<ul style="list-style-type: none"> • Making unwelcome or intrusive comments about a person's cultural attire • Calling people racial names or referencing the colour of the skin in an insult
Harassment	<ul style="list-style-type: none"> • Making derogatory comments or taunts because of a person's disability, age or sexual orientation • Offensive gestures based on a person's disability, age or sexual orientation • Making unwelcome comments about someone's age 	<ul style="list-style-type: none"> • Ignoring or isolating a person because of their disability • Making insulting slurs based on a person's ethnicity or negatively commenting on a person's heritage
LGBTIQA+ status harassment	<ul style="list-style-type: none"> • Unwelcome jokes of a sexual nature or referencing someone's sexual orientation • Deliberately misgendering an individual's gender identity (e.g. towards a colleague who has transitioned gender) • Making hurtful, derogatory or unwanted comments about a colleague's sexuality 	<ul style="list-style-type: none"> • Using negative comments or slurs about LGBTIQA+ people at work • Unwelcome questions/ comments about a person's sex life • Initiating gossip at work, or innuendo regarding someone's LGBTIQA+ status (e.g. someone who is Intersex or is not open about being LGBTIQA+)
Victimisation	<ul style="list-style-type: none"> • Being ostracized or excluded from work or work related social function after making a complaint about a colleague's inappropriate behaviour 	<ul style="list-style-type: none"> • Being denied a promotion after helping a colleague make a discrimination complaint
Bullying	<ul style="list-style-type: none"> • Excluding, isolating, ostracizing or freezing out (e.g. encouraging others not to associate with a colleague) 	<ul style="list-style-type: none"> • Aggressive or intimidating conduct (e.g. standing unnecessarily close or throwing work tools down on a bench)

Types of unacceptable behaviour	Examples	
	<ul style="list-style-type: none"> • Verbal, physical or emotional abuse (e.g. swearing, shouting, pushing or coercing) • Spreading malicious rumours • Unjustified criticism or complaints • Malicious pranks or initiation rituals 	<ul style="list-style-type: none"> • Behaving in a rude and hostile manner (e.g. treating a team leader in a demeaning and denigrating manner during meetings) • Unreasonable work expectations • Belittling or humiliating comments
Vilification	<ul style="list-style-type: none"> • Making severely disrespectful and highly offensive statements about a particular race in a team meeting 	<ul style="list-style-type: none"> • Handing out pamphlets or written material in the canteen that incites hatred about LGBTIQ+ people

3.3 Everyone has a role to play

Everyone at Stanwell has a role to play in preventing and responding to unacceptable behaviours. At Stanwell, we all set the tone and can make a positive change by what we say, or do.

Our people are expected to:

- Behave in a way that creates a safe, respectful and inclusive environment through demonstrating our Values and acting in accordance with the Way We Work at Stanwell (our Code of Conduct), this policy and their obligations under various legislation;
- Speak up if you experience, observe or become aware of unacceptable behaviour, if you feel safe to do so, and make it clear when behaviours are unacceptable;
- Ensure the person impacted is safe and check in on them if appropriate;
- Understand how the person impacted would like you to help and encourage them to take action if appropriate;
- Undertake training or the induction relating to the Way We Work at Stanwell (our Code of Conduct);
- Understand the principles of this policy, recognise unacceptable behaviours and understand your obligations under this policy;
- Cooperate as requested in any enquiries or investigations about alleged incidents; and
- Keep details of the incident enquiries or investigations confidential.

Our leaders are integral in caring for our people and delivering our strategy. Our leaders are also expected to:

- Identify, address and educate our people about behaviour that enables or condones unacceptable behaviours;
- Create an environment that encourages teams to feel safe speaking up about or reporting unacceptable behaviours they experience, or know of;
- Demonstrate and model acceptable behaviour;

- Support an individual who is impacted and understand how they would like the issue managed;
- Prioritise the care and support of those impacted when responding to issues raised or observed;
- Escalate concerns in accordance with this policy and the Respectful Workplace Procedure and confidentially; and
- Reflect on our learnings and share our experiences to prevent inappropriate behaviours from occurring at Stanwell.

3.4 Personal relationships

A close personal relationship can be difficult to define because personal relationships can take many forms and can mean different things to different people and relationships can evolve over time. Many long-term platonic or intimate relationships form through work connections.

While we respect the privacy of employees, sometimes the nature of the relationships formed gives rise to actual, perceived conflicts of interest or compromised objectivity when it comes to important work-related decisions or actions.

Stanwell's Personal Relationships Procedure explains our expectations regarding full and early disclosure of these relationships so that any implications can be understood and we can work together to resolve any actual or potential conflict.

3.5 Reporting unacceptable behaviours

To help our people choose how they wish to report concern about someone's behaviour, we offer multiple options so they can speak with whomever they are most comfortable.

Reports can be made by people directly impacted or others who observe or know of the unacceptable behaviour. Reporting unacceptable behaviour helps us understand what is happening in the organisation.

Letting Stanwell know about these behaviours does not necessarily trigger a formal investigation, although that may be appropriate in some cases. Support, advice and early intervention may be effective in resolving the issues.

(i) A leader

You can speak to your line leader or any member of our leadership team (if you are uncomfortable speaking with your own leader in the first instance). Leaders can listen to your concerns, talk with you about your options, where you can get support and the different ways Stanwell could help you to resolve the issue.

There are some circumstances where a leader may need to refer the issue to the People and Culture (P&C) or Legal team, for example, where the behaviour is serious, creates risk to the psychological health and physical safety of others or where it involves a senior member of our organisation.

(ii) A P&C representative

Our P&C team can be contacted directly. They can help in various ways depending on your wishes and the circumstances of the issue.

They can:

- Listen to your concerns, talk with you about your options, where you can get personal support and the different ways the organisation could help you to resolve the issue.

- Support a leader to initiate a process to inquire or investigate your concerns, where appropriate, using an internal or external investigator.

(iii) Speak Up Platform

In instances where raising concerns with a leader or P&C representative may not be appropriate, or if you do not feel safe doing so, the Speak Up Platform offers a viable alternative. This platform provides employees, contractors, and consultants with a secure and confidential means to submit their concerns.

Speak Up: The Whistleblower pathway in Speak Up will send your matter directly to the Whistleblower Protection Officer.

(iv) Respect Contact Officers

We have a network of Respect Contact Officers based across each of our locations. You can choose to speak to the person you feel most comfortable with, regardless of your location or team.

Respect Contact Officers are employees from various teams within Stanwell who have volunteered to play a role in creating a safe workplace at Stanwell. Their details can be found on GenNet.

They can:

- Provide you with another avenue to obtain information promptly and confidentially about concerns relating to unacceptable behaviours.
- Listen to your concerns, talk with you about your initial options and support you in finding information including personal support.

Each Respect Contact Officer is provided with training and information relating to their role, confidentiality expectations, Stanwell policies and procedures and resolution pathways.

(v) Stanwell's Whistleblower Protection Policy

In some circumstances, you may prefer to tell us about the behaviour through our Whistleblower protection framework. This framework provides you with a confidential way of raising your concerns about Reportable Conduct and gives you the option, if you prefer, of not sharing your identity.

You can report these matters by contacting the Company Secretary (Whistleblower Protection Officer) by:

Phone: 1800 671 902
Email: company.secretary@stanwell.com
Mail: Feedback
C/- Company Secretary
GPO Box 800
Brisbane QLD 4000

You should refer to the *Whistleblower Protection Policy* for more information on how this option may apply to your situation.

(vi) External body

You may wish to seek help from an external body or authority who can provide information about your options.

Some organisations who specialise in matters relating to unacceptable behaviours include:

- Australian Human Rights Commission
- Queensland Human Rights Commission
- Fair Work Commission
- Workplace Health and Safety Queensland
- Crime and Corruption Commission Queensland

3.6 How we will respond

There are a number of ways we can help to resolve concerns depending on the wishes of the person impacted by the behaviour, the context and circumstances. These resolution options include:

- Early intervention
- Informal pathways
- Formal action
- External pathways
- Referral to Police where an alleged criminal offence has occurred

Stanwell's aim is to prevent and eliminate unacceptable behaviour from occurring in our workplace. As concerns will differ, our approach does not mean we respond in the same way to every incident.

Our Respectful Workplace Procedure sets out in detail the options and processes for addressing and resolving concerns relating to unacceptable behaviours.

3.7 Possible outcomes

Consequences for breaching this policy

The decision about any outcomes relating to a breach of this policy will take into consideration all of the circumstances of the case including the seriousness of the behaviours, the context, the impact on the individual, the seniority of the offender and any relevant industrial instruments.

There are a range of outcomes and implications for a person's employment that we might consider if unacceptable behaviour is substantiated. This may include, but will not be limited to:

- Requirement to participate in education or behaviour change coaching;
- Disciplinary action against the person found to have engaged in the unacceptable behaviour, including and up to termination of employment or termination of engagement;
- An apology from the offender, facilitated in a controlled way with support people; or
- Consequences for the position and remuneration of the offender such as demotion; transfer to another location; withholding remuneration increases or bonus payments; removal of leadership responsibilities.

Any outcomes will be made in accordance with the Respectful Workplace Procedure, Managing Performance and Conduct Procedure and the *Stanwell Power Station Enterprise Agreement 2019* (where applicable). In certain circumstances, a breach of this policy may be referred to an appropriate authority for investigation.

Where a serious allegation has been made about matters which might meet the definitions of a Protected Disclosure under the Whistleblower Protection Policy, then the recipient of the

information (such as the Leader or People and Culture) should treat the complaint confidentially and immediately report the disclosure to the Whistleblower Protection Officer (Company Secretary), so that the information can be dealt with under the Protected Disclosure Procedure.

Organisation action

Our goal is to prevent unacceptable behaviour from occurring at Stanwell. If an incident occurs, it may be necessary to undertake a review of a particular work site or environment and implement targeted interventions such as culture surveys and further education.

Transparency of the existence of incidents and sharing de-identified case studies will also ensure that our leaders and employees continue to build capability in preventing these behaviours from occurring.

Information or complaints without substance

While complaints without substance are rare, if any of our people are found to have knowingly provided false information, knowingly made allegations of unacceptable behaviour without any substantive merit or for vexatious or malicious reasons, they may be subject to disciplinary action. In some circumstances, providing false or misleading information could be a criminal offence.

3.8 Supporting you

We offer multiple support options when you are reporting or responding to unacceptable behaviour. These support options are available to people who report issues, participate in inquiries or are the subject of inquiries about their behaviour.

Stanwell support services:

A leader, a P&C representative and Stanwell's Respect Contact Officers can all provide support to you. We also have two independent and confidential providers of counselling services that you can access:

- TELUS Health our Employee Assistance Provider (EAP); or
- Bunyarra Wellbeing Co.

This support can be through teleconference or with one on one on-site counselling services. You can find their details on GenNet. These providers have trained counsellors who can listen to your concerns and connect you with tools or strategies to help support your wellbeing.

External support services:

You may choose to seek support from an external provider. Providers that you may like to consider include:

- 1800Respect: the national domestic, family and sexual violence counselling, information and support service
- Mates in Energy: offer a support line and case management to workers who need support
- Lifeline: provides confidential crisis support that is accessible 24 hours a day via telephone, online chat or text messages

4.0 Responsibilities

Accountability	Requirement
Executive General Manager Business Services and/or Whistleblower Investigation Officer	<ul style="list-style-type: none"> Responsible for the investigation of complaints that breach this policy.
People and Culture	<ul style="list-style-type: none"> Ensure the appropriate training is provided in relation to this Policy, accompanying procedure and relevant legislation, codes and toolkits.
Leaders	<ul style="list-style-type: none"> Promote and provide information to employees, contractors and/or visitors on how to access this policy and associated procedure, and where to seek advice on relating to this policy. Understand that everyone has a role to play and the additional obligations for our leaders. Comply with all aspects of this policy. Respond appropriately to unacceptable behaviours taking into consideration resolution options.
Employees and Contractors	<ul style="list-style-type: none"> Comply with all aspects of this policy. Contribute towards a respectful workplace and raise concerns when they observe unacceptable behaviours. Complete training in relation to the Way We Work at Stanwell and Respectful Workplaces.
Visitors	<ul style="list-style-type: none"> Comply with all aspects of this policy.

5.0 Review, Consultation and Communication

Review:

This Document is required to be reviewed, as a minimum, every two years.

Communication/Requirements after Update:

This policy is available electronically via GenNet and Stanwell.com

At a minimum, this policy and any subsequent updates are communicated via GenNet to the entire corporation. Additional communication may be coordinated by the policy owner to update and inform relevant leaders and employees.

6.0 Definitions

Stanwell	Stanwell Corporation Limited and any body corporate which is ultimately wholly owned by Stanwell Corporation Limited.
Employee	A permanent full time, permanent part time, fixed term or casual employee employed by Stanwell Corporation Limited and any body corporate which is ultimately wholly owned by Stanwell Corporation Limited.
Leader	An employee's Line Leader or Supervisor.

7.0 References

Legislation (as amended or replaced from time to time) includes:

- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Fair Work Act 2009 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Anti-Discrimination Act 1991 (Qld)
- Work Health and Safety Act 2011 (Qld) and Managing the Risk of Psychosocial Hazards at Work Code of Practice 2022

Document No	Document Title
GOV-PROC-80	Respectful Workplace Procedure
GOV-POL-30	The Way We Work at Stanwell (our Code of Conduct)
GOV-POL-29	Whistleblower Protection Policy
GOV-PROC-36	Protected Disclosure Procedure
GOV-PROC-39	Managing Performance and Conduct Procedure
PEO-POL-24	Diversity and Inclusion Policy
PEO-PROC-09	Flexible Work Arrangement Procedure
PEO-PROC-XX	Close Personal Relations Procedure

8.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorse/Check	Approved By
0	03.08.2023	Replaced Fair Treatment Policy. Updated to reflect legislative definitions, compliance with legislation and feedback received through the 2022 Respect Review.	Keah Rose	PSC	Board
1	05.12.2024	Reference to Speak Up platform included.	Melissa Lee	Glenn Smith	Board