

Policy title	Anti-discrimination, bullying and harassment policy
Policy number	EP002
Owner	Managing Director
Date effective	01 July 2025
Date of next review	30 June 2028

1 Purpose

In keeping with its vision and values, all Estuari People are expected to demonstrate honest, law-abiding, respectful, and fair behaviour. This policy articulates the responsibilities and expectations of Estuari People in observing and upholding Estuari’s approach to inappropriate behaviour and conduct in the workplace.

2 Scope and audience

This policy applies globally to all Estuari People as defined herein. The policy also applies to visitors to Estuari places of work.

Estuari People are subject to the laws of the country they are in, however must follow the principles of this policy regardless of whether that country has specific fraud and corruption laws in place.

3 Applicable laws and regulation

Discrimination, bullying, harassment, sexual harassment, victimisation and vilification are unacceptable at Estuari and are unlawful under the following legislation:

- *Fair Work Act 2009* (Cth);
- *Sex Discrimination Act 1984* (Cth);
- *Racial Discrimination Act 1975* (Cth);
- *Disability Discrimination Act 1992* (Cth);
- *Age Discrimination Act 2004* (Cth); and
- Unique State and Territory discrimination and / or equal employment opportunity laws.

4 Definitions

Term	Definition
Bullying	<p>Repeated, unreasonable behaviour directed towards another person that creates a risk to health and safety. It can include, but is not limited to, behaviours which may be considered unreasonable, such as:</p> <ul style="list-style-type: none"> ▪ Verbal abuse ▪ Initiation or hazing practices ▪ Intimidation ▪ Humiliation

	<ul style="list-style-type: none"> ▪ Undermining and threatening behaviours ▪ Sabotaging another person’s engagement with Estuari ▪ Ridiculing a colleague’s opinion ▪ Assigning meaningless tasks unrelated to the position ▪ Psychological harassment ▪ Excluding or isolating colleagues ▪ Deliberately withholding information that is vital for effective performance of a colleague’s duties
Discrimination	Unfair treatment towards an individual based on a personal attribute protected by law. Discrimination can be direct or indirect, and protected attributes are different depending which State or Territory the conduct occurs in.
Direct discrimination	Where a person treats – or proposes to treat – another person or persons with an attribute unfavourably because of that attribute.
Estuari People	As the context requires, all directors, employees, contractors, consultants, volunteers, and members of Estuari, irrespective of location.
Harassment	Unwelcome behaviour or conduct that causes a person to feel offended, humiliated or intimidated, where a reasonable person could have anticipated that reaction in the circumstances. Harassment may include one-off behaviours or conduct, and need not be repeated.
Indirect discrimination	Where a person imposes – or proposes to impose – a requirement, condition or practice on another person or persons that has, or is likely to have, the effect of disadvantaging persons with an attribute, and that is not reasonable.
Protected attribute	<p>Personal characteristics which it is unlawful to discriminate against under applicable legislation. Protected attributes under the Fair Work Act are:</p> <ul style="list-style-type: none"> ▪ Race ▪ Colour ▪ Sex ▪ Sexual orientation ▪ Age ▪ Physical or mental disability ▪ Marital status ▪ Family or carer's responsibilities ▪ Pregnancy ▪ Religion ▪ Political opinion ▪ National extraction ▪ Social origin ▪ Breastfeeding ▪ Gender identity ▪ Intersex status ▪ Experiencing family and domestic violence.

	Applicable attributes may differ depending on the State or Territory the conduct occurs in.
Sexual harassment	<p>Unwelcome behaviour or conduct of a sexual nature that causes a person to feel offended, humiliated or intimidated, where a reasonable person could have anticipated that reaction in the circumstances. Examples of sexual harassment may include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Staring or leering ▪ Unnecessary familiarity, such as deliberately brushing up against another colleague, or unwelcome touching ▪ Suggestive comments or jokes ▪ Insults or taunts of a sexual nature ▪ Intrusive questions or statements about a colleague’s private life ▪ Displaying posters, magazines or screen savers of a sexual nature ▪ Sending sexually explicit emails or text messages ▪ Inappropriate advances on social networking sites ▪ Accessing sexually explicit internet sites whilst at work ▪ Requests for sex or repeated unwanted advances ▪ Other behaviour that may be considered an offence under applicable criminal laws, such as physical assault, indecent exposure, sexual assault, stalking and / or obscene communications.
Victimisation	Where a person subjects or threatens to subject another person to any detriment because the other person – or a person associated with the other person – makes a complaint (i.e. of sexual harassment, harassment, bullying etc.).
Vilification	Behaviour that incites hatred, serious contempt, revulsion or severe ridicule for a person or group of people, because of an attribute.

5 Policy statement

Estuari recognises that inappropriate behaviour in the workplace, such as discrimination, bullying, harassment, vilification, victimisation and / or sexual harassment, can create physical and psychosocial risks to the health and safety for our team members. Estuari is committed to ensuring a safe, flexible and respectful environment for all Estuari People, free from inappropriate behaviour.

All Estuari People are entitled to:

- Work free from incivility and inappropriate behaviour
- The right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised
- Reasonable flexibility and genuine consideration of their needs in performance of the duties.

6 Roles and responsibilities

The Managing Director is responsible for:



- Ensuring all team members understand and are committed to the principles at law relating to inappropriate behaviour and conduct canvassed in this policy, and applying them in Estuari places of work
- Setting the example in their own behaviour
- Ensuring Estuari follows through with its commitment to proactively addressing inappropriate behaviour
- Ensuring immediate and appropriate steps are taken to minimise or eliminate unlawful and inappropriate behaviour in Estuari environments
- Ensuring all complaints regarding inappropriate behaviour are treated confidentially (insofar as possible), seriously and with empathy.

Managers and supervisors must:

- Model appropriate standards of behaviour
- Take steps to educate and make employees aware of their obligations under this policy and the law
- Intervene quickly and appropriately when they become aware of inappropriate behaviour
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard
- Help employees resolve complaints informally where possible
- Refer formal complaints about breaches of this policy to People & Capability for investigation
- Ensure employees who raise an issue or make a complaint are not victimised
- Ensure that recruitment decisions are based on merit and that no discriminatory requests for information are made
- Genuinely consider requests for flexible work arrangements.

All team members must:

- Ensure they do not engage, or aid / abet / encourage others to engage, in unlawful or inappropriate behaviours
- Follow the Estuari complaints procedure in good faith if they experience any inappropriate behaviour
- Maintain confidentiality if involved in the complaint procedure
- Treat everyone with dignity, courtesy and respect.

7 Breach

Any breach of this Policy by a team member may lead to counselling or further disciplinary action by Estuari, up to and including dismissal or cessation of engagement.

8 Version history

Version	Date of approval	Summary of updates
1.0	01 July 2025	Approved.

