

# Respectful Workplace Policy

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## 1. Purpose

Stockland is committed to providing a safe and respectful workplace and taking positive actions to enhance our employee experience.

Stockland is committed to providing workplaces free from **discrimination (including racism), harassment (including sexual harassment), bullying, victimisation, aggression, and violence**. We want to achieve this because we care about the wellbeing and contribution of each of our employees and it aligns with our purpose and values.

All Stockland employees are expected to behave in a manner which positively represents our brand, reputation, and values, ensuring that their actions don't cause harm to others (even if harm is not intended).

The purpose of this Policy is to give our employees clarity on how we collectively create and maintain a respectful workplace, including:

- clearly defining responsibilities and expected standards of behaviour;
  - detailing the types of behaviours that are considered unacceptable;
  - helping our employees recognise and call out poor behaviour; and
  - providing employees with practical options to raise and address any concerns they may have.
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## 2. Scope

This Policy applies to all employees with a connection to a Stockland workplace, including remote or third-party worksites, and applies to Stockland Corporation Limited, Stockland Trust and their related companies and trusts (collectively "Stockland") and all Stockland employees (including non-executive directors, permanent, casual, fixed/maximum term employees, and temporary workers) ("employees" or "you").

Key topics covered in this Policy (click the topic to be taken to the relevant part of this Policy)

- [When does this Policy apply?](#)
  - [What are my responsibilities?](#)
  - [Respectful Workplace Behaviours](#)
    - [What is discrimination?](#)
    - [What is harassment?](#)
    - [What is sexual harassment?](#)
    - [What is bullying?](#)
    - [What is victimisation?](#)
  - [Speaking up when witnessing inappropriate behaviour](#)
  - [What is respectful workplace communication?](#)
  - [What is workplace conflict?](#)
  - [How should I handle workplace violence?](#)
  - [How to Raise concerns](#)
  - [Reporting and Evaluation](#)
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- [What Employee assistance is available?](#)
- [What are the relevant laws and related legislation?](#)
- [How does this Policy interact with relevant laws?](#)
- [What if I breach this Policy?](#)
- [When will the Policy be reviewed?](#)
- [What are the related policies?](#)

Adherence to this Policy is mandatory.

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### 3. When does this policy apply?

This Policy applies to all activities and behaviours in connection to the workplace, including:

- carrying out your work duties (for example, serving Stockland customers);
- at work-related events, including social functions, that may be outside of work hours;
- at non-related work events such as social gatherings that may be in connection to employment;
- when using Stockland equipment or facilities, including computers, email, and phones;
- when using social media platforms and/or online messaging services; and
- when completing any duties in connection with Stockland.

While we seek to engage with partners who share our values and the standards set out in this policy, nothing in this Policy is intended to create a relationship of employment, agent or contractor/principal between Stockland and any employee of an unrelated company, contractor or client.

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### 4. What are my responsibilities?

Everyone has a role to play in helping create and maintain a respectful workplace at Stockland.

We expect all employees (and any other person to whom this Policy applies) to comply with the standards of behaviour outlined in this Policy, and to speak up when they see unacceptable or inappropriate behaviour taking place at the workplace, or in connection with the workplace.

We expect that all employees will:

- positively contribute to a respectful workplace culture through their actions, behaviours, and words;
- behave responsibly and professionally;
- listen and respond appropriately to the views and concerns of others;
- speak up and not walk past problems;
- exercise reasonable judgement;
- be a role-model and uphold Stockland's values;
- be fair and honest in their dealings with others; and
- maintain confidentiality, where appropriate.

## 5. Respectful Workplace Behaviours

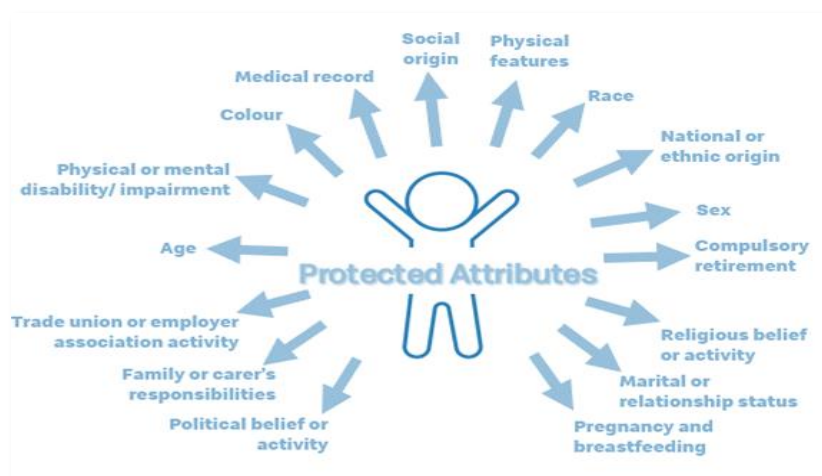
Stockland will not tolerate disrespectful workplace behaviour in any form and is committed to providing an environment where all employees feel valued, safe, comfortable and respected whilst being free from discrimination, harassment and bullying.

### 5.1. What is discrimination?

Equal employment opportunity means that all people regardless of their protected attributes have a right to be fairly considered for employment, promotion, or training opportunities. Unlawful discrimination in respect of any decision-making process at Stockland is not allowed under this Policy.

Unlawful discrimination is treating a person or a group of people less favourably based on a “protected attribute”. It is also unlawful to discriminate against another person because they have a close relationship with a person with a protected attribute, for example, not inviting a person to a work event because they are married to someone with a disability or making a joke about people with disabilities to a person who is married to someone with a disability.

The attributes protected by anti-discrimination legislation vary between jurisdictions and include (but are not limited to) the attributes outlined in the below graphic:



\*The definition of “sex” is inclusive of sexual orientation, gender identity, sexual expression or activity and intersex status.

Unlawful discrimination can be direct, when a person or a group of people are treated less favourably than another person or another group of people in similar circumstances because of a protected attribute. Examples include only hiring employees of a particular gender or overlooking someone for a promotion because of their race.

Unlawful discrimination can also be indirect, when a requirement or condition applies in the same way for everybody but disadvantages a group of people who share a protected attribute, provided the requirement is not reasonable. A possible example of this would be requiring all employees to complete an online activity which does not cater for the visually impaired where reasonably alternate activities are available.

Discrimination can be isolated or once off. Systemic unlawful discrimination is unlawful discrimination that affects any person and is continuous, repetitive or forms a pattern.

It is not unlawful to base decisions for career advancement on conduct, performance, experience, and qualifications, or where a disability means the employee is unable to perform the inherent requirements of the role.

Any employee of Stockland who becomes aware of discriminatory practices or behaviour is expected to speak up and report these.

## 5.2. What is harassment?

As defined by the Australian Human Rights Commission, harassment can be unlawful when a person is treated less favourably on the basis of certain personal characteristics, such as age, sex, pregnancy, marital status, breastfeeding, age, disability, sexual orientation, gender identity or intersex status. Some limited exemptions and exceptions apply. Harassment can include behaviour such as:

- telling insulting jokes about particular racial groups
- sending explicit or sexually suggestive emails or text messages
- displaying racially offensive or pornographic posters or screen savers
- making derogatory comments about someone's race or gender
- asking intrusive question about someone's personal life, including their sex life

Behaviour is considered unwelcome where it has not been invited or solicited by a person, and where the recipient regards it as undesirable, offensive or disagreeable. Whether the behaviour is unwelcome is a subjective question from the perspective of the person subject to the behaviour. The behaviour may still be unwelcome even where it:

- may not have been unwelcome to others;
- has been accepted behaviour in the work environment in the past; or
- was not intended to offend, humiliate or intimidate.

Harassing another employee, or person that an employee may encounter whilst carrying out their work or performing their duties is unacceptable at Stockland and may be unlawful.

Harassment can take many forms, including physical, verbal, or visual harassment, and can be a single incident or repeated behaviours. Harassment may include comments said to a person, as well as words or statements made on a phone call, or in a text message, video, email or published online through social media.

The intention of the person carrying out the behaviour does not matter. Even if a person's behaviour was not meant to cause humiliation, offence, embarrassment, or intimidation, it may still be harassment.

## 5.3. What is sexual harassment?

Sexual harassment is defined by the Australian Human Rights Commission as an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Sexual harassment can take many forms, including physical, verbal, or visual harassment, and can be a single incident or repeated behaviours.

Even if a person's behaviour was not intended to be sexual in nature, nor cause humiliation, offence, embarrassment or intimidation, it may still constitute sexual harassment if the person receiving the behaviour perceives it as sexual harassment.

Sexual harassment may include:

- unwelcome sexual advances;
- unwelcome physical contact such as pinching, kissing, unnecessary touching, or invading someone's personal space;
- staring or leering in a sexual manner;
- persistently inviting someone on a date after previous refusal and unwelcome requests for any activity that is sexual in nature;
- making suggestive statements or drawings by phone, text message, video, email or published online or on social media
- unwelcome comments or jokes of a sexual nature or about a person's appearance, body shape, sexual activities, sexual orientation, gender identify or intersex status; or
- intrusive questions or comments about private life, gender identity, sexual orientation, sexual relationships and sexual practices.

### Objective Test of Sexual Harassment

The test of sexual harassment is objective, and asks the question: *"would a reasonable person, having regard to all the circumstances, anticipate the possibility that the harassed person would be offended, humiliated or intimidated by the behaviour?"*

The list of circumstances that are considered to determine this includes:

- sex, age, sexual orientation, gender identity, intersex status, marital or relationship status, disability status, religious belief, race, colour, national or ethnic origin; and
- the relationship between the parties involved.

Employees should be mindful of what they are discussing and sharing and making sure these conversations do not encroach on inappropriate topics that may be offensive or unwelcome to those involved.

### Unlawful Sexual Harassment

Sexual harassment can be unlawful and legal action may be taken against an employee who engages in it. Stockland recognises that senior leaders within Stockland may also be personally liable for sexual harassment carried out by employees, where they have failed to create a safe and respectful workplace.

In some cases, Stockland will report matters to the Police if there are reasonable grounds to suspect a crime has taken place (e.g., a suspected sexual assault) and Stockland will support the complainant in contacting and reporting the matter if the complainant chooses to do so.

## Hostile Work Environments

A hostile work environment exists when a person's behaviour within the workplace creates an environment that is offensive, intimidating or humiliating for another person to work in.

It is unlawful for a person to subject another person to a hostile work environment.

A hostile work environment can be caused by, for example, the sexual harassment of other colleagues, the displaying of obscene or pornographic materials, general sexual or sex-based banter or innuendo and offensive jokes. In such an environment, there may not be one individual victim, rather multiple people of one sex may be made to feel uncomfortable or excluded by the work environment.

### When can personal relationships be an issue at work?

Employees should consider carefully whether their conduct in pursuing or engaging in a personal relationship with a co-worker may be inappropriate or unwelcome. Even if the relationship occurs outside of the workplace it may impact the workplace, workplace behaviour and working relationships.

While some employees may form personal relationships through work, these types of relationships can also impact on the business where the relationship creates an actual, potential, or perceived conflict of interest. All employees must familiarise themselves with and comply with Stockland's Workplace Relationships Policy and Code of Conduct.

Possible workplace concerns which should be considered include:

- the nature of the working relationship between two parties. For example, if one employee is more junior, they may feel pressured to participate in a relationship;
- a manager cannot be seen to be impartial due to their relationship with an employee;
- whether the relationship between two employees makes others feel uncomfortable or unfairly treated; and
- whether the person can give clear and legal consent.

If you are in a relationship with another employee of Stockland, you are required to disclose that relationship to your direct manager in the first instance and then a People and Culture representative, so that they can effectively manage the actual, perceived, or potential conflict of interest in line with the Workplace Relationship Policy and Code of Conduct.

Sexual harassment may arise in situations where the personal relationship ends and the intimate behaviour of one of the parties is no longer welcome. Support should be sought from the relevant manager or the Employee Assistance Program as soon as possible if an employee is concerned about their behaviour or the behaviour of their ex-partner.

## 5.4. What is bullying?

Workplace bullying is repeated unreasonable behaviour directed towards an employee or group of employees that a reasonable person, having regard to all of the circumstances, would anticipate to be humiliating, intimidating, undermining or threatening and which causes a risk to an employee's health and safety. Bullying can include behaviour that intimidates, humiliates, threatens, or victimises a person (or people), such as:

- making comments that are abusive, oppressive, insulting or offensive;
- unjustified criticism, complaints or excessive scrutiny;



- deliberately excluding someone from workplace activities;
- withholding information that is vital for effective work performance; setting unreasonable timelines or constantly changing deadlines;
- setting tasks that are unreasonably below or beyond a person's skill level;
- denying access to information, supervision, or resources to the detriment of the employee;
- spreading misinformation or malicious rumours;
- deliberately changing work arrangements such as rosters and leave to inconvenience a particular employee;
- not supporting or recognising the gender identity of an individual;
- aggressive and intimidating behaviour; or
- teasing, practical jokes or initiations/hazing.

Some instances of bullying will also amount to unlawful discrimination and/or sexual harassment.

Workplace bullying can impact the safety, health and wellbeing of our employees, and allegations of this nature are taken extremely seriously by Stockland. Bullying impacts not only the people involved, but the overall safety and culture of our workplaces. While one off instances of inappropriate behaviours may not fit the legal definition of bullying, these incidents can be very serious and present a risk to the health, safety and overall wellbeing of the impacted employees.

### What is not workplace bullying?

Reasonable management action, typically taken by managers or supervisors in relation to how work is to be performed or carried out, is not workplace bullying. Examples of reasonable management action may include:

- setting reasonable performance goals, standards and deadlines;
- rostering and allocating reasonable working hours;
- transferring an employee for operational reasons;
- deciding not to select an employee for promotion following a suitable selection process;
- informing an employee about unsatisfactory work performance in a fair and constructive manner;
- informing an employee about inappropriate behaviour in an objective and discreet way;
- disagreement with an employee on a given issue;
- implementing organisational changes or restructuring; or
- taking disciplinary action, including suspension or terminating employment.

### Cyber Bullying

Stockland expects all employees to conduct themselves online in the same safe and respectful way that they are required to when physically in their work environment. Cyber bullying is repeated unreasonable behaviour using technology (such as computers, tablets, smartphones) and software (social media, instant messaging, texts, emails, websites and/or other online platforms) directed towards an employee or a group of employees that creates a risk to their health, safety, and wellbeing.

Cyber bullying can happen at any time, in public or in private, and it is often only the bully and the victim who are aware it is taking place. Cyber bullying may include:

- abusive or hurtful texts, emails or posts, using words, images or videos;
- deliberately excluding others online;

- spreading gossip or rumours on social media; or
- imitating others online or using their log-in.

Employees should be aware that their conduct on the internet, including usage of social media, outside of working hours may still be subject to this Policy.

### 5.5. What is victimisation?

Victimisation is when a person who has made, or intends to make, a complaint or is involved in a complaint (such as a witness) about workplace behaviour is treated negatively because of their involvement. It also includes when a person is treated adversely because they support or are involved in addressing another person's complaint.

We encourage and expect our people to speak up if they see inappropriate behaviour. In return, we are committed to ensuring that our people can make genuine complaints without fear of retaliation or retribution. Employees of Stockland must not victimise anyone who reports inappropriate behaviour, a breach of this Policy or a breach of any applicable and relevant workplace laws. Any instances of this may result in disciplinary action being taken against the employee.

## 6. Speaking up if witnessing inappropriate behaviour

Sometimes we come across situations or incidents at work that we know are not right. When we see inappropriate behaviour, we want our employees to show support by calling out this behaviour and speaking in a safe and respectful way. This is consistent with our existing workplace health and safety obligations to protect each other from harm including physical and psychological harm.

### Why do we need Stockland employees to speak up?

Speaking up is expected because when we speak up, we take the first step in stopping unacceptable behaviour. Speaking up role-models respect and conduct aligned with our values, encourages others to come forward with concerns, and help build a culture of belonging where each person has a voice.

### When should you speak up?

It can sometimes be difficult to decide if you should speak up in certain situations. We encourage employees to consider the following questions if you are unsure what to do:

- Am I offended by what I saw?
- Does this situation worry me, or should it worry me?
- Does any person involved look or seem uncomfortable?
- Does watching this make me feel uncomfortable?

If you answered yes to any of these questions, you are encouraged to speak up if safe to do so.

Some examples of behaviours where you are expected to speak up include:

- An employee making hurtful comments referring to another employee's disability, sexuality, religious affiliation, gender or race;
  - When an employee is being harassed by another employee;
  - Inappropriate behaviour of a sexual nature;
  - Nasty or hurtful comments being made on social media by an employee about another employee;
- or



- Any use of alcohol or illegal drugs in breach of Stockland's Drug and Alcohol Policy.

### Who should I speak up to?

You can speak up to whomever you feel most comfortable. If you feel safe and comfortable doing so, calmly tell the other person you have an issue with their behaviour and ask that it stop or change. They may not realise the effect their behaviour is having, and your feedback may give them the opportunity to change their actions. You may also consider suggesting an alternate way of behaving in the circumstance that is acceptable to you.

If you are not comfortable speaking directly to the person, then you may wish to speak to your Manager, a member of the People and Culture team, or for more serious matters it may be through our different whistleblower channels. Where it is deemed not safe to intervene, an employee must still raise their concerns in an appropriate manner per the Escalation Policy.

### What role do Managers play in speaking up?

Managers play a critical role in setting and upholding the culture of the workplace and Stockland's values. Managers who show an appreciation for the importance of speaking up help create and foster a safe and respectful workplace. By role modelling speaking up and encouraging others to speak up, Stockland recognises the benefit this can have on creating a supportive and open workplace culture. Managers also have a role in supporting those who are impacted by inappropriate conduct.

A Manager who fails to speak up or report inappropriate behaviour may face disciplinary action.

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## 7. What is respectful workplace communication?

Stockland encourages positive and inclusive communication between all employees, including communication with any relevant stakeholders.

Respectful and inclusive communication should occur across all formats, including written, verbal, and digital – including email and social media. Managers have an increased responsibility to lead by example and always role-modelling the expected standards of communication.

Employees who choose to communicate in a language other than English within the workplace are encouraged to be mindful of the potential for miscommunication and misunderstanding, as well as the potential for feelings of exclusion or isolation of those who do not speak that language.

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## 8. What is workplace conflict?

Not all conflict will constitute bullying, harassment, discrimination, or victimisation - the behaviour may instead be an example of workplace conflict. Workplace conflict, whilst unwelcome, may not constitute a breach of this Policy.

Workplace conflict can occur when people's ideas, decisions or actions are in opposition, or when two employees don't get along. Workplace conflict may include two managers openly disagreeing on the best way to launch a promotion, or two colleagues having strong differing views on a project.

While workplace debate can be healthy and lead to better decisions, workplace conflict can detract from a positive work environment and, in appropriate circumstances, may be managed using the processes in this Policy.

## 9. How should I handle workplace violence?

Stockland is committed to providing safe workplaces for all employees. This includes identifying initiatives to minimise, reduce or eradicate disrespect, abuse and violence towards employees by members of the public, customers, clients and any other person interacting with our employees.

Workplace violence is any incident in which a person is abused, threatened, or assaulted in circumstances related to their work. We expect Stockland employees to speak up if they witness or experience workplace violence.

Workplace violence is unacceptable and will not be tolerated. Instances of workplace violence may amount to a crime (e.g., common assault) requiring Police notification.

## 10. How to Raise Concerns

At Stockland, we want everyone to feel comfortable in speaking up if they are feeling mistreated or uncomfortable. This includes our employees as well as our customers, residents, and suppliers.

### Resolving Concerns

Stockland understands that concerns can vary in nature, severity, duration, and expected resolution. How grievances can be raised, investigated, and resolved at Stockland will depend on the relevant factors, as well as the preferences of the parties involved, risk to health and safety, and the needs of the business.

Stockland commits to:

- Provide practical support and counsel on available support to the parties involved
- Taking action to limit any risk to health and safety
- Limit visibility and protect confidentiality (where appropriate)
- Provide suitable resolution options for reported grievances

If you feel safe and comfortable doing so, calmly tell the other person you have an issue with their behaviour and ask that it stop or change. They may not realise the effect their behaviour is having on you, and your feedback may give them the opportunity to change their actions. You may also consider suggesting an alternate way of behaving in the circumstance that is acceptable to you.

Stockland encourages anyone who experiences or witnesses behaviour which is not in line with our Values, or in compliance with our Respectful Workplace Policy, to act promptly in reporting the matter.

Raising awareness of an issue or incident allows us to become aware of a matter in a timely fashion, and assist with resolving it. Concerns can be reported informally or formally. For more information on how to raise concerns, understand the support available, and any considerations, please refer to the [Stockland Grievance Procedure](#) (located on People Hub)

*Please note that if your concern is about your manager, you can speak to another (or more senior) person about it. If you are uncomfortable doing this, you are encouraged to contact a People and Culture Representative to discuss your concerns, who will assist you to raise the matter with a suitable person.*

## Whistleblower Policy

Certain matters may fall under the protection of Stockland's Whistleblower Policy. If an Employee is not comfortable with reporting these matters through their manager or People and Culture, they are encouraged to report the incident in accordance with the Whistleblower Policy. Please refer to the Stockland Whistleblower Policy ([Whistleblower Policy](#)).

## Accessibility

Stockland recognises the importance of having a grievance resolution process that is accessible to all employees, including those who may experience communication difficulties or have a disability which needs accommodating.

Stockland is committed to giving fair and reasonable consideration to any measures requested to facilitate full participation in the processes in this Policy. Employees are encouraged to advise Stockland of any accessibility matters so that these can be appropriately considered, including the inclusion of any carer or guardian in relevant discussions.

If you require additional support (e.g. you identify as LGBTQ+, have a disability or are from a culturally or linguistically diverse background), you can reach out to [People Services](#) who will put you in touch with an appropriate person.

## Raising false or misleading concerns

It's important to raise concerns that are true, and an honest reflection of what has occurred.

Any employee who raises a concern or reports bullying, harassment, discrimination, or victimisation must make sure they have a legitimate and genuine basis to do so. This means the employee should genuinely believe that a person (which could be the employee), is being bullied, harassed, discriminated against, or victimised and is raising the concern or making the report on that basis and not on any other unrelated basis.

If a concern is raised, or a report made, which is deliberately false, illegitimate, or misleading, then disciplinary action may be taken, up to and including possible termination of employment.

## Confidentiality and anonymity

Stockland is committed to handling all matters raised under this Policy with sensitivity and discretion. This includes considerations regarding confidentiality and anonymity. Where it is not possible to maintain confidentiality (due to the seriousness of the matter and/or action required by the empower) this will be discussed with you.

Where required, or appropriate, Stockland may notify external support services, authorities, or a governing or regulatory body of a grievance.

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## 11. Reporting and Evaluation

The prevention of and response to sexual harassment is a priority at Stockland and included in reporting to our Board and Stockland Leadership Team to help inform further action that our organisation needs to take to eradicate sexual harassment.

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## 12. Training

All permanent Stockland employees and maximum / fixed-term employees on contracts of 6 months or more complete on-line “Laws at Work” training as part of their induction process and then every 18 months thereafter. This training includes how to recognise, prevent, respond to and report workplace bullying. New employees are also informed of the process and support available to them with regards to reporting inappropriate behaviour as part of orientation and/or by acknowledging they have received and have read this policy as part of their new starter paperwork. Individuals and/or teams may be required to undertake more targeted training where warranted.

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## 13. What Employee Assistance is available?

Stockland’s Employee Assistance Program [Benestar](#).

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## 14. What are the relevant Laws and related legislation?

The People and Culture team can provide information on relevant laws and legislation as required.

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## 15. How does this Policy interact with relevant laws?

This Policy is not intended to override any rights or obligations under any applicable industrial instrument, or any applicable legislation.

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## 16. What if I breach this Policy?

To the extent that this Policy requires you to do, or refrain from doing something, it constitutes a direction from Stockland with which you must comply. Employees who breach this policy may face disciplinary action up to and including dismissal.

Failure to comply with this Policy may lead to disciplinary action. Disciplinary action can include:

- requiring you to issue a verbal or written apology;
- re-training in this Policy and other applicable re-training;
- a worksite transfer or restricted site access;
- counselling or a written warning; and/or
- Withholding remuneration increases or bonus payments
- termination of employment or engagement.

Employees should also be mindful that non-compliance with applicable Federal, State and Territory laws may lead to prosecution, fines, or imprisonment of the employee and/or representatives of Stockland.

All employees must adhere to Stockland's Escalation Policy in reporting any breach of this Policy that you are involved in or become aware of and do so in a timely manner.

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## 17. When will the Policy be reviewed?

This Policy is reviewed and updated:

- When there are relevant changes in business practice, legislation and compliance obligation; or
- At least once every 2 years; and
- When applicable and appropriate, whichever is sooner of the above

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## 18. What are the related policies?

- [Workplace Relationships Policy](#)
- [Conflict of Interests Policy](#)
- [Whistleblower Policy](#)
- [Code of Conduct](#)
- [Grievance Procedure](#)
- [Escalation Policy](#)

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## 19. Contact for Questions

For further details on any aspect of this Policy, please contact People Services on 02 9035 2020 option 2 or email [peopleservices@stockland.com.au](mailto:peopleservices@stockland.com.au).

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## 20. Document Control

Revision	Date	Owner	Description of changes
1.0	November 2023	General Manager, Performance and Reward	New policy