



Anti-Discrimination and Harassment Policy

1 Introduction

Stockland will not tolerate discrimination, and aims to provide a working environment which allows all employees to realise their full potential and contribute to business success as part of a workforce whose make up reflects the diversity of the broader Australian population. To deliver on this, Stockland requires all employees to refrain from engaging in bullying, discriminatory, harassing or victimising conduct towards any colleagues, customers, suppliers, contractors or other individuals while at work or in the course of performing their duties or at work related functions including social events. All Stockland employees have a responsibility to treat all people with whom they work (including other employees, customers and suppliers) with respect, and avoid making judgements and decisions based on prejudice or assumption. This policy defines Stockland's position on some of the key issues which must be addressed as part of the creation of a truly diverse organisation.

2 Discrimination

Stockland will not tolerate discrimination against any employee, job applicant, customer or supplier is discriminated against because of any irrelevant factor. These factors include, but are not limited to:

- Gender
- Gender identity
- Gender expression
- Age
- Race, Nationality or Ethnic Origin
- Disability
- Family or Carer's Responsibilities
- Parental Status
- Marital or relationship Status
- Medical or Irrelevant Criminal Record
- Political Convictions
- Pregnancy or Potential Pregnancy
- Religious Beliefs
- Breastfeeding
- Industrial Activity or Union Membership
- Sexual orientation
- Intersex status
- Social Origin
- Physical Appearance

It may also be unlawful to discriminate against someone, and in any event Stockland will not tolerate discrimination against someone, on the basis of their association with someone with any of the above factors.

Discrimination can take two forms:

- Direct Discrimination, which occurs when a person is treated less favourably because of an irrelevant factor; and
- Indirect Discrimination, which occurs when an unjustifiable requirement or condition is imposed which has a disproportionate impact on people of a particular group or persuasion.

3 Harassment

Harassment involves behaviour of a physical, verbal or non-verbal nature which is unwelcome or offensive and which may intimidate or humiliate the recipient. It can involve a single action or a series of actions. Whether or not a particular behaviour constitutes harassment is determined by the perception of the person subjected to the behaviour – the intent or motive of the perpetrator is irrelevant. Harassment can occur at any time during the course of employment, including at work-related social functions and will not be tolerated by Stockland in any circumstances.

Examples of the types of behaviour which are likely to be considered harassment include:

- Derogatory or unwelcome comments regarding someone's race, sexual orientation, appearance or gender identity etc.



- Unwanted physical contact, including patting, touching, hugging or brushing up against someone's body.
- Pressure for social activity outside work where it has been made clear that this is not welcome.
- Jokes or innuendos relating to a person's gender, sexual orientation, race etc.
- Shouting or public humiliation.
- Offensive or obscene pictures, calendars, screen savers etc.
- Exclusion or social isolation.
- Distribution or viewing of offensive material via email or the Internet.
- Suggestions that sexual favours may further someone's career (or hinder it).
- Obscene telephone calls, texts or emails or through comments on or via social media.

Harassment does not include:

- Consenting relationships between people who are mutually attracted to each other; or
- Justifiable management action.

Physical assault (including sexual assault) is not an example of harassment, it is a criminal offence which, if it occurs, will be placed in the hands of the police.

4 Victimization & Vilification

Victimization occurs when someone who has reported an act of discrimination, harassment or provided information in an investigation is subsequently treated less favourably.

Vilification is behaviour that may encourage others to hate, have contempt for or severely ridicule a person or group of people because of their race, gender, sexual orientation etc.

Stockland will not tolerate any form of victimisation or vilification and will do everything reasonably possible to prevent it from occurring, such as maintaining the confidentiality of complainants wherever possible and taking appropriate action with those who victimise or vilify others.

5 Bullying

Stockland will not tolerate bullying by or towards anyone at the workplace, and is committed to preventing workplace bullying.

Bullying is repeated and unreasonable behaviour towards a person or group by another or others in the workplace, which creates a risk to health and safety. It includes behaviour that intimidates, offends, degrades, threatens or humiliates another person.

Reasonable management action carried out in a reasonable way is not bullying. Other examples of behaviour that does not constitute bullying includes:

- Setting reasonable performance goals, standards and deadlines
- Rostering and allocating working hours where the requirements are reasonable
- Transferring a worker for operational reasons
- Informing a worker about unsatisfactory work performance or inappropriate behaviour in an objective confidential way
- Implementing organisational changes or restructuring
- Lawful termination of employment

Examples of behaviour, whether intentional or unintentional, that may be considered to be 'bullying' include:

- Abusive or insulting language or comments
- The use of offensive language
- Excluding, marginalising or isolating employees from normal work activities
- Persistent teasing, joking or holding a person up to ridicule
- Spreading misinformation or malicious rumours
- Repeatedly speaking to a fellow employee in a manner which is sarcastic or designed to humiliate
- Sending offensive or humiliating emails, texts or comments via social media
- Assigning meaningless tasks unrelated to an employee's role or unreasonably below an employee's skill level
- Unjustified criticism or complaints
- Deliberately changing working hours to inconvenience particular employees
- Deliberately withholding information that is vital for their effective work performance
- Sabotaging another employee's work.

Single incidents of such behaviour where they present a risk to health and safety will not be tolerated



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

The use of Stockland's electronic mail, internet or other computer systems to bully another person would also be in breach of Stockland's electronic mail and internet policy.

6 Legislation

Harassment, discrimination, bullying, victimisation and vilification are unlawful and Stockland may, where appropriate, refer any unlawful behaviour to the police, the work health and safety regulator or other relevant external body.

7 Raising Concerns

If you think you are being bullied, discriminated against, harassed, victimised or made to feel uncomfortable at work by an employee, supervisor, manager, client or supplier, you should speak up. If you feel comfortable doing so, you should also speak firstly to the person concerned, letting them know that their behaviour is unacceptable to you and that you want it to stop.

Otherwise in the first instance, you should contact if possible your manager otherwise your Human Resources Manager. You may also look to invoke the Grievance Procedure.

All reported incidents will be taken seriously and, any bona fide allegations made will be investigated. Stockland is not required to investigate any complaint or reported incident which appears to lack substance or if insufficient information is provided to enable a fair investigation to be conducted. Investigations will be conducted in a timely and impartial manner, and confidentiality will be maintained wherever possible.

Employees can access free, confidential counselling from our [employee assistance program](#).

If you think someone else at work is being bullied, discriminated against, harassed, victimised or made to feel uncomfortable by someone else at work, you should also speak to your Human Resources Manager. Managers and supervisors are also expected to be proactive in dealing with and/or reporting issues they observe within their teams.

If an Employee is not comfortable with reporting through Line Management or Human Resources Manager, they are encouraged to report the incident in accordance with the Whistleblowing Policy: See the [Whistleblower Policy](#) for further details.

8 Training

All permanent Stockland employees (and fixed-term employees on contracts of 6 months or more) complete on-line workplace bullying training as part of their induction process and then every 18 months after that. 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.

9 Breach

Any bullying, harassment, discrimination, victimisation or vilification is serious. Any employee found to have breached this policy in any way will be subject to appropriate disciplinary action which may include counselling, demotion, transfer or termination of employment, and may also be required to apologise and/or undertake additional training.

10 Policy Compliance

10.1 Employees who breach this policy may face disciplinary action up to and including dismissal

10.2 You 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.

11 Review

This Policy is reviewed and updated:

- When applicable and appropriate, including when there are changes in business practice, legislation and compliance obligations; and



- At least every 2 years.

12 Related Policies

[Whistleblower Policy](#)

[Code of Conduct](#)

13 Contact for Questions

For further details on any aspect of this policy, please contact the HR Services team via TAC on (02) 9035 2020, select option 2 or email TAC@stockland.com.au.

External bodies for complaints or information

Australian Human Rights Commission	1300 656 419
Fair Work Commission	1300 799 675
Anti-Discrimination Board of NSW	02 9268 5544
SafeWork NSW	13 10 50
Victorian Equal Opportunity & Human Rights Commission	1300 891 848
WorkSafe Victoria	03 9641 1555/1800 136 089
Anti-Discrimination Commission Queensland	1300 130 670
WorkSafe Queensland	1300 362 128
Equal Opportunity Commission of Western Australia	08 9216 3900
WorkSafe Western Australia	1300 307 877
ACT Human Rights Commission	02 6205 2222
WorkSafe ACT	13 22 81

14 Document Control

Revision	Date	Owner	Description of changes
1.0	24/01/2006	General Manager, Human Resources	Original document
1.1	10/02/2014	General Manager, Human Resources	Updated document
1.2	22/01/2016	General Manager, Human Resources	Minor formatting changes Minor update to definition of harassment Minor update to definition of victimisation & vilification
1.3	03/05/2018	General Manager, Human Resources	Updated formatting
1.4	13/06/2019	General Manager, Human Resources	Minor update to factors
1.5	08/06/2021	General Manager, Organisation Development and Corporate, People and Culture	Minor updates and Board Approved External Policy