



# Workplace Behaviour Policy

In accordance with our Code of Conduct, Clough is committed to ensuring a working environment free from harassment, bullying, victimisation and aggression.

Clough will not tolerate:

- **Workplace Bullying** is when a person or a group of people repeatedly behave unreasonably towards a worker or a group of workers at work. Examples include aggressive or intimidating conduct, belittling or humiliating comments, teasing or practical jokes.
- **Workplace Harassment** is any unwelcome behaviour associated with unlawful discrimination which offends, intimidates, degrades, humiliates or creates a hostile work environment, irrespective of intent. Unlawful harassment can be direct or indirect on the grounds of (covered under applicable legislation) including, but not limited to, sex, marital status or pregnancy, family responsibility or family status, sexual orientation, race, religious or political conviction, impairment, age or, in certain cases, gender history. Unlawful harassment can be of a verbal, non-verbal or physical nature.
- **Workplace Aggression** is an action or incident which may physically or psychologically harm another person. Aggressive behaviour is present in situations where workers and other people are threatened, verbally abused, attacked or physically assaulted at work.
- **Workplace Victimisation** is where a person subjects, or threatens to subject, another person to disadvantage on the grounds that the person victimised has made, or proposes to make, a complaint or take other action under Equal Opportunity legislation.

In order to achieve this commitment, Clough will:

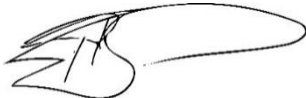
- Encourage the reporting of behaviours which breach this Policy;
- Educate employees about acceptable behaviour at work;
- Promptly, effectively and confidentially address complaints;
- Promote appropriate standards of conduct at all times;
- Provide appropriate and effective processes, structures and resources to prevent and address issues of harassment, bullying, victimisation and aggression.

All managers must:

- Implement this policy and ensure all employees work in an environment free from the threat or risk of harassment, bullying, victimisation and aggression;
- Ensure that all employees are aware that bullying, harassment, aggression or victimisation will not be tolerated;
- Role model appropriate behaviour at all times; and
- Act on any matter brought to their attention in accordance with this policy.

It is the responsibility of all employees to ensure they do not bully, harass, victimise or behave aggressively towards another employee or other people in the workplace. Employees must be aware that noncompliance with the policy will result in disciplinary action, which may include dismissal, as well as being subject to possible action under applicable legislation (Federal or State).

Employees, who believe they are being subjected to workplace harassment, bullying, victimisation or aggression should contact their Line Manager or Human Resources.



**Peter Bennett**

Chief Executive Officer & Managing Director  
Clough Limited  
October 2021