

# Anti Bullying, Harassment and Discrimination Policy

## 1.0 Introduction

SCG Limited is committed to providing a safe and respectful environment for all employees free from all forms of harassment, bullying and discrimination. Employees are required to treat others with dignity, courtesy and respect. This applies to all behaviour from, or directed at, an employee, contractor, customer, suppliers or visitor.

This policy looks to ensure that all employees:

- Understand SCG's commitment to a positive workplace and that unacceptable behaviour will not be tolerated under any circumstance
- Have access to the information and resources they need to better understand and prevent harassment, bullying and discrimination
- Know how to raise a concern or complaint and the options available to them.

## 1.1 Harassment

**Harassment** is defined as any unwelcome comment, conduct or gesture that is insulting, intimidating, humiliating, malicious, degrading or offensive. It might be repeated or an isolated incident but it is so significant that it adversely affects someone's performance, contribution or work environment. It can include physical, degrading or threatening behaviour, abuse of power, isolation, discrimination, sexual harassment and racial harassment.

Refer to the Employment Relations Act 2000 for definitions about **Discrimination, sexual harassment** and **racial harassment**. It is behaviour that is unwanted by the recipient even if the recipient does not tell the perpetrator that the behaviour is unwanted. It may be unintentional.

## 1.2 Bullying

Bullying is defined as unreasonable and repeated behaviour from an individual towards another person or group that can lead to physical or psychological harm. Repeated behaviour is persistent and can include a range of actions. Unreasonable behaviour covers actions which a reasonable person wouldn't do in similar circumstances, these can include;

- victimising
- shouting
- racial slurs
- humiliating
- ridiculing
- belittling
- intimidating
- physically threatening.

A single incident is not considered bullying but can escalate if ignored.

Managing performance in line with business policies and processes is not bullying.

#### **1.4 Discrimination**

SCG shall ensure that there is no discrimination in employment and occupation. Employment and occupation practices are non-discriminatory.

#### **1.5 Freedom of Association and the Right to Collective Bargaining**

SCG shall respect freedom of association and the effective right to collective bargaining.

Employees are able to establish or join worker organizations of their own choosing.

SCG respects the full freedom of workers' organizations to draw up their constitutions and rules.

SCG respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

#### **1.6 Responsibilities**

SCG will do the following to minimise and respond to workplace bullying, harassment or discrimination. Senior management and the board of directors will minimise workplace bullying, harassment or discrimination by:

- establishing respect for the broad range of human values and character strengths required for the organisation to survive;
- actively looking for ways to create a positive workplace "healthy work" that employees feel is pleasant, fair, rewarding and positively challenging;
- encouraging positive leadership styles and investing in our managers to achieve this;
- training key employees to receive bullying reports and give support and advice;
- directing attention towards behaviour rather than people, and aiming to promote harmonious relationships across the organisation;
- providing workers who believe they have been bullied, harassed or discriminated against with a range of options to resolve the issue;
- promoting low-key solutions before formal actions where appropriate;
- aiming to repair the working relationship and promote positive work values;
- openly discussing bullying, harassment and discrimination, in both formal and informal settings, and providing information and training about it;
- identifying factors that contribute to bullying, harassment or discrimination, and putting effective control measures in place;
- ensuring our processes and systems are fit for purpose and regularly reviewed;
- having regular worker surveys on our work culture.

Employees agree to:

- tell their managers if they experience or see any bullying, harassment or discrimination behaviours – if the manager is the person behaving in a bullying, harassing or discriminatory manner then advise the Managing Director or the People & Culture Advisor;
- try low-key solutions, e.g. if you feel safe to do so, talk to the person about their behaviour.
- follow the company's informal or formal processes when making a complaint;
- keep an eye out for other people, providing support when seeing a person being isolated or experiencing reprisals;
- accept that perceptions of bullying may need to be negotiated.

Managers agree to:

- ensure workers have clarity on what their roles entail;
- intervene early to call out and deal with any unreasonable behaviour before it escalates;
- record and investigate complaints fairly and in line with the business or undertaking's policies and processes;
- look for informal solutions before escalating an issue to higher levels (eg. mediation or investigation) where appropriate.

When dealing with an allegation of bullying, harassment or discrimination SCG will:

- treat all matters seriously and investigate promptly and impartially;
- ensure neither the person who complained nor the alleged bully are victimised;
- support all parties involved;
- find appropriate remedies and consequences for confirmed bullying as well as false reports;
- communicate the process and its outcome;
- ensure confidentiality;
- use the principles of natural justice;
- keep good documentation
- have specialist external advisors available to help.

To report bullying, harassment or discrimination, you can use the following forms (available online or from HR) to make a formal complaint against bullying or to report informal behaviour:

- Informal Reporting of Unreasonable Behaviour
- Formal Report of Bullying, Harassment or Discrimination

Upon receipt of any complaints of bullying or informal behaviour reported, SCG will follow the general principles:

- **Take all allegations seriously**
- **Act promptly**  
Set timelines and deal with reports/complaints as soon as we can after we receive them.
- **Clearly communicate the process**  
Tell everyone involved what the process is  
Let the people involved know if there are delays to timelines

- **Ensure non-victimisation**  
Protect the people involved from victimisation.
- **Support the people involved**  
Anyone involved can have a support person present at interviews or meetings (eg health and safety representative, their union, colleague, friend).  
Tell everyone involved what support is available to them (eg do you have an employee assistance programme, health and safety representatives?).
- **Maintain privacy (confidentiality)**  
Maintain privacy for all parties involved.  
Ensure details of the matter are only known to those directly concerned (except their representative or support person).
- **Be unbiased and fair**  
Treat the people involved fairly.  
Get someone unbiased and trained to look into the allegation.  
Make decisions on how to deal with the allegation based on the facts.  
Clearly tell the people involved what you are going to do (taking into account privacy).