

APPROPRIATE WORKPLACE BEHAVIOUR POLICY

Ghella is an **equal opportunity employer** that endeavours to maintain a safe and productive work environment where people are treated with dignity, courtesy and respect. Inappropriate behaviours in the workplace are not acceptable and are not condoned by Ghella. They can also be unlawful under local legislation and may expose the persons concerned and Ghella to liability.

Inappropriate behaviour may occur by way of insults, comments, gossiping or spreading of rumours, social isolation or targeting, physical acts, intimidation or emotional manipulation. Inappropriate behaviours may be constituted by:

- **Bullying** - a repetitive anti-social or unreasonable behaviour that offends, degrades, intimidates or humiliates a person, including continuously and deliberately excluding someone from workplace activities, withholding information essential for effective work performance or setting unreasonable deadlines or tasks unreasonably below or beyond a person's skill level, denying access to information, supervision, consultation or resources such that it has a detriment to the worker, spreading misinformation or malicious rumours, changing work arrangements, such as rosters and leave, to deliberately inconvenience a particular worker or workers or excessive scrutiny of work.
- **Discrimination** - when a person is treated less favourably than another because of a particular attribute (directly or indirectly). Our *Equality, Discrimination and Inclusion Policy* provides more details on these aspects.
- **Harassment** - behaviour which, because of its severity or persistence, is likely to create a hostile or intimidating environment and detrimentally affects a person's participation or engagement and includes offensive, belittling, humiliating, intimidating or threatening, unwelcome and unsolicited behaviours and is of the type that is usually unreciprocated and can usually be expected to be repeated, makes the work environment unpleasant, humiliating or intimidating, and can make it difficult for work to be effectively completed.
- **Sexual Harassment** - any behaviour of a sexual nature, which is unwelcome. It may involve a single incident or a series of incidents. Sexual Harassment may include physical contact (e.g. touching, patting, pinching, kissing or embracing someone, sexual assault and rape), verbal comments and non-verbal actions (e.g. leers, stares, displays of sexually explicit material, offensive body and hand movements, suggestive letters, drawings and emails, indecent exposure or stalking), including the unwelcome or inappropriate promise of rewards in exchange for sexual favours or adverse employment decisions as a result of denied sexual favours.
- **Victimisation** - when a person targets, exploits or treats another person unfairly including taking action, bullying or intimidating a person because they have made a complaint, denying promotion opportunities without reasonable consideration of their objective merits or reasonable requests for flexible work arrangements being denied due to a personal dislike of the person making the request.

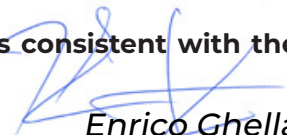
Ghella encourages employees to try to initially resolve issues directly and informally through a process of discussion and conciliation. However, it is crucial that employees do not ignore inappropriate behaviours they may experience, witness or become aware of as this may give the impression that these behaviours are acceptable. Managers are tasked to provide support for informal grievances and complaints or trigger formal investigations/escalation as appropriate.

Ghella provides access to confidential reporting channels that may be used for cases of inappropriate behaviour in the workplace. Our *Whistleblowing Policy* provides more details on this.

Ghella requires that its business partners, suppliers and subcontractors align to the appropriate workplace behaviour principles expressed in this policy.

This policy is communicated to our employees as part of the mandatory induction process and it is available to all stakeholders via the company's website and the intranet.

It is reviewed annually during management system reviews to ensure it is consistent with the company's mission and vision.


Enrico Ghella
Chairman, January 2020