

### 1. Objectives

To provide the Company Standard for ensuring, promoting, and maintaining a Workplace environment free from all forms of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization.

To ensure education of employees and third parties, and to encourage and/or require employees/third parties and managers to report hazards, risks, concerns or complaints in order to prevent bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization in the Workplace or which has the potential to cause psychological harm and/or an effect upon the Workplace.

## 2. Scope and Applicability

#### 2.1 **Processes**

- 1. Processes: People/Human Resources, Legal, Ethics and Compliance and Assurance.
- 2. Sub-processes: None.

#### 2.2 Individuals/Organizations

- 1. Internal: Employees of Worley and all of its subsidiaries.
- 2. External: Third parties on Worley premises, job applicants, temporary workers, contractors, suppliers, consultants, customers, and visitors.

### 3. Requirements to be met

#### 3.1 Introduction

- The company expects co-workers and third parties to behave in accordance with this Standard. This Standard is supported by Code of Conduct which forms part of an employee's contract of employment.
- This Standard is to be read in conjunction with The Respectful Workplace Behavior Policy.



### 3.2 Standard

- Any requests for exceptions or deviations to this Standard must be submitted to the process owner.
- In locations where, local applicable law provides greater protection than the provisions of this Standard, local applicable law shall be followed. In these situations, the local People team shall communicate applicable differences.
- We do not tolerate any form of disrespectful or harmful behaviors including bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization. The Company's work environment should be free from disrespectful or harmful behaviors, for any reason including but not limited to those protected characteristics as set forth in section 5 below.
- Company Standard and/or local applicable law prohibit co-workers and third parties, as well as supervisors and managers, with whom the employee comes into contact from engaging in bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization.
- The Company prohibits all forms of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization., regardless of whether it happens to be illegal under the law of the jurisdiction where it occurs or whether it happens to be acceptable within local cultural norms in a country where the Company is working. What may appear to be common behavior in certain countries because of local customs may still be a prohibited conduct under this and other Company policies because it is not consistent with the Company's values, principles and expectations.
- Co-Workers must treat colleagues and others with dignity and respect and should always consider whether their words or conduct could be offensive, demeaning, belittling and/or cause psychological harm.
- Employees and third parties should take the time to ensure they understand this Standard and what types of behavior are unacceptable, both in and out of the Workplace (i.e., business trips, events or social functions), or which has an effect upon the Workplace.
- Even unintentional bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization is unacceptable and, in some cases, unlawful.
- Any form of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization may subject both the Company and those individuals personally committing such acts to legal liability; conduct and behavior does not have to rise to the level of illegality under applicable law in order to violate this Standard.
- Impact versus intent.
  - Conduct and behavior under this Standard are measured and assessed by determining the impact and/or potential harm caused on the targeted



person or group. The intent of the individual is not the focus when determining offensiveness or impact.

- The questions asked are whether a reasonable person would be offended under the circumstances and whether the complaining party was personally offended. Keep in mind that differences in the protected characteristics as set forth in section 5 may result in different views as to what is offensive and what is not.
- Supervisor/subordinate romantic and/or sexual relationships are prohibited.
  - Romantic and/or sexual relationships between a subordinate employee and anyone who has direct or indirect supervisory authority or is in a position of authority ("Supervisor" for purposes of this section-n) over the subordinate employee undermine the atmosphere of trust essential to the employment relationship and may result in claims of harassment or discrimination, including sexual harassment.
  - · Consequently, it is a violation of this Standard for a subordinate employee and a Supervisor to become involved in a romantic and/or sexual relationship. When a romantic and/or sexual relationship develops or exists, the Supervisor must immediately disclose the relationship to his or her Immediate Supervisor (or, in the case of the CEO, to the Lead Director of the Board of Directors) ("Immediate Supervisor") and to the People Team. The subordinate employee may disclose the relationship to the Immediate Supervisor and to the People Team. A manager or supervisor who becomes aware of a romantic and/or sexual relationship between a Supervisor and a subordinate employee must disclose the matter to the People Team. The Immediate Supervisor and the People Team, in consultation with Legal, will determine the appropriate course of action including, but not limited to transfer or termination of one or both employees. Under no circumstances shall the Supervisor make or participate in any decisions that affect the compensation, evaluations, working hours, or any other employment conditions of the subordinate employee.
- Reporting.

Any employee has the right and obligation to report bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization whether directed at the employee or observed by the employee. Employees reporting bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization in the Workplace, or which have an effect upon the harm of the individual or Workplace, may do so to any supervisor or manager in their reporting line, to the People Team and/or to the Worley Ethics Helpline or to a member of Legal. If reporting to a supervisor, manager, People or Legal, employees must report incidents of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization to an individual who is not involved in the allegation of



bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization.

- Hazards that relate to bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization must be recorded in the Worley Assurance System as a hazard. If the matter relates to an incident this is to be recorded as an event and normal reporting processes to the Worley Ethics Helpline.
- Managers and supervisors are required to immediately report any complaints (whether received directly or indirectly) of harmful behaviors (or other misconduct) to the People Team or to the Worley Ethics Helpline, who will engage with Compliance as determined necessary, so the Company can investigate and, when determined to be necessary, take steps to resolve the complaint. This obligation by managers and supervisors exists even when the complaint is directed at the manager or supervisor receiving the complaint, and even when the individual submitting the complaint does not report to the manager or supervisor directly. All incidents of violence in the Workplace, or which have an effect upon the Workplace, must immediately be reported to a member of management, the People Team and Assurance. Emergency services are to be contacted in the event of immediate danger. All incidents of violence are to be recorded as an event in the Assurance System.
- Any incident that results in a physical or psychological injury that requires any form of medical treatment, days away from work, restricted/reduced work duties or transfer to another job shall be reported and recorded in accordance with Incident Reporting. Any incident that results in the damage or loss of Worley property or assets shall be reported in accordance with the before mention procedure.
- Any employee who experiences or witnesses bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in the Workplace, or which has an effect upon the individual or workplace, may also report the incident to the Worley Ethics Helpline as follows:
  - Submit a report online. (Available toll-free 24 hours a day, 7 days a week.)
  - <u>https://worleyparsons.sharepoint.com/sites/Ethics/SitePages/Ethics-</u> <u>Helpline(1).aspx</u>
- Any employee who witnesses or is a victim of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in the Workplace, or which has an effect upon the Workplace, will be provided support through the company Employee Assistance Program (EAP).
- External complaints of harassment or discrimination.



- Nothing in this Standard is intended to prevent employees from pursuing other avenues of recourse if they believe they have experienced or are experiencing bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in the Workplace, or which have an effect upon the Workplace. Such recourse may include filing a complaint with an appropriate federal agency (e.g., the U.S. Equal Employment Opportunity Commission or its local jurisdiction equivalent), or any other national, state or local agency.
- Investigation.
  - The Company shall provide a timely acknowledgement to any report of alleged bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization.
  - The Company shall ensure an investigation is conducted by qualified personnel.
  - The investigation shall be timely under the circumstances and conditions present, fair, and thorough; the investigation should be conducted consistent with the local law and policies applicable to investigations; and appropriate due process should be provided based on local law applicable to such investigations.
  - The Company will close the investigation in a timely manner, as such may be affected by the circumstances and conditions present.
  - If determined appropriate and necessary to the circumstances based on the investigation, the Company shall take appropriate remedial and other steps to prevent further offences.
- Confidentiality.
  - Confidentiality is an important part of the processes provided under this bullying, victimization and Harassment Standard. The Company will use its best endeavors to ensure confidentiality is maintained. In this regard, everyone involved in the operation of this Standard, whether making a complaint or involved in any investigation, is responsible for observing the high level of confidentiality that is required. Details of the investigation, including the names of the person(s) making the complaint and the person accused must only be disclosed to those directly involved in the investigation and for sole purpose of conducting the investigation.
  - Any employee who violates confidentiality in a manner inconsistent with this Standard may be subject to appropriate disciplinary action, up to and including termination of employment.
- Disciplinary action.
  - Any employee who violates this Standard or encourages another to violate this Standard shall be subject to undertaking appropriate remedial measures and/or subject to disciplinary action, up to and including termination of employment.



- Any employee who makes a complaint of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in bad faith, or who deliberately provides false information or otherwise acts in bad faith as part of an investigation, shall be subject to appropriate disciplinary action, up to and including termination of employment.
- Retaliation.
  - Company Standard forbids retaliation against any employee who opposes bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in the Workplace, or which has an effect upon the Workplace, files a complaint, or testifies or participates in an investigation (see Whistleblower) in relation to a complaint.
  - No action will be taken against any employee who reports a complaint of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization in good faith, no matter what the outcome of the investigation.
  - Prohibited retaliation includes, but is not limited to, demotion; suspension; termination; failure to hire, promote, or grant merit increases; or failure to consider for hire, promotion, or grant of merit increases.
- Training.
  - Information and/or required training regarding bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization prevention and reporting shall be communicated and made available to employees upon hire, and periodically thereafter, as necessary.
- Maintenance.
  - The People Team, in consultation with Legal, shall review the Standard regularly and recommend changes as appropriate.
- Records.
  - Confidential records relating to reports of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, or victimization; investigations; and outcomes shall be maintained in appropriate Company records by the People team or other such group responsible for maintenance of such records.
  - Confidential disciplinary action records shall be maintained in the employee's personnel file.



# 4. Responsibilities

Responsibility	Action
Employees/Co Workers	Employees and co-workers are responsible for respecting the dignity of others, adhering to this Standard, and reporting instances of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization to their manager or People team, whether the employee is the subject of the prohibited behavior, learns of it from one of the parties involved, or is a bystander, when it occurs and as consistent with this Standard.
Managers	Managers are responsible for adhering to this Standard. They are to report all instances of harmful behaviors in a timely manner and are responsible for building and maintaining a safe and respectful work environment.
People Team and Assurance	People Team and Assurance (each in consultation with Legal) and/or Legal are responsible for investigating (or causing the investigation of) complaints of bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization; recommending an appropriate response (following consultation with Legal); and maintaining confidential records of any complaints. HR is also responsible for ensuring the periodic training of employees regarding preventing and addressing bullying, harassment, sexual harassment, sexual assault, discrimination, racism, vilification, violence, and victimization in the Workplace.
Assurance	Assurance, in consultation with the before mentioned functions, are responsible for any associated injury and illness records, and records associated with property damage.

## 5. Definitions

Word / Phrase	Definition			
Bullying and Victimization	Repeated unreasonable, offensive, intimidating, malicious or insulting behavior directed towards a person in the Workplace (as defined herein) involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation. Bullying can take the form of physical, verbal and non-verbal conduct, including but not limited to:			
	1. Physical bullying. Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.			
	2. Verbal bullying. Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.			
	3. Gesture bullying. Nonverbal gestures that can convey threatening messages.			
	4. Exclusion. Socially or physically excluding or disregarding a person in work-related activities.			
	5. In addition, depending on the surrounding circumstances and facts, the following examples may constitute or contribute to evidence of bullying in the workplace:			
	<ul> <li>Persistent singling out of one person or group of persons.</li> </ul>			
	<ul> <li>Shouting, name-calling, insults or raising one's voice at an individual or individuals in public or in private.</li> </ul>			
	Social or physical isolation			



Word / Phrase	Definition
Bullying and	<ul> <li>Using obscene or intimidating comments or gestures.</li> </ul>
Victimization (Continues)	<ul> <li>Persistently and regularly not allowing another person to speak or express themselves (i.e., ignoring or interrupting).</li> </ul>
	<ul> <li>Personal insults and use of offensive nicknames.</li> </ul>
	Public humiliation in any form.
	<ul> <li>Constant criticism on matters unrelated or minimally related to the person's job performance or description.</li> </ul>
	<ul> <li>Spreading rumors and gossip regarding individuals.</li> </ul>
	<ul> <li>Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions).</li> </ul>
	<ul> <li>Deliberately excluding an individual or isolating the person from work- related activities, such as meetings.</li> </ul>
	<ul> <li>Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).</li> </ul>
	<ul> <li>Withholding information and resources to perform a person role and or assigning impossible deadlines</li> </ul>
	6. Legitimate, reasonable and constructive criticism of a colleague's performance or behavior, or reasonable instructions given to workers during their employment, will not amount to bullying on its own.
Harassment or Discrimination	Includes verbal, physical, and visual conduct that creates an intimidating, offensive, abusive, or hostile work environment or that interferes with work performance. Harassment or discrimination also includes, but is not limited to, any derogatory or inappropriate treatment directed toward an individual because of (1) race, (2) religion, (3) creed, (4) color, (5) national origin, (6) ancestry, (7) sex (including pregnancy, childbirth, breastfeeding, or medical conditions related to pregnancy, childbirth, or breastfeeding),
	(8) age, (9) medical condition, (10) marital or domestic partner status, (11) sexual orientation, (12) gender, (13) gender identity or intersex status, (14) gender expression and transgender status, (15) mental disability or physical disability, (16) genetic information, (17) military or veteran status, (18) citizenship, (19) low-income status, or (20) any other status or characteristic protected by applicable law. Persons may be harassed even if they are not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for him or her.
	1. Harassment or discrimination includes but is not limited to:
	<ul> <li>Verbal conduct such as epithets; offensive or derogatory comments; unusual comments about appearance or dress; racial slurs or comments, or offensive or derogatory ethnic jokes; or unwanted sexual advances, invitations, or comments.</li> </ul>
	<ul> <li>Visual conduct such as offensive or derogatory posters, cartoons, drawings, or gestures, also to include internet, e-mail, social media and any other form of communication.</li> </ul>
	<ul> <li>Unwanted and inappropriate physical contact or horseplay, including touching, pinching, pushing, grabbing, impeding or blocking normal movement, unnecessary brushing against someone, invading personal space, physical or sexual assault, or interference with work directed at an individual because of gender or another protected status.</li> </ul>
	<ul> <li>Unwelcome sexual advances, suggestive behavior, threats, demands, and requests for unwanted sexual favors such as a sexual request in order for an individual to keep his/her job or avoid some other loss, or an offer of job</li> </ul>



Word / Phrase	Definition		
Harassment or Discrimination	benefits in return for sexual benefits/favors or a suggestion that a refusal will hinder his/her career.		
(Continues)	<ul> <li>Retaliation, which is adverse action taken against an individual, for having reported harassment or discrimination or participated in an investigation regarding harassment or discrimination.</li> </ul>		
	• Stalking or pestering a person with unwanted attentions, gifts or messages.		
	<ul> <li>Mocking, mimicking or belittling a person's religion, mental or physical disability or age.</li> </ul>		
	<ul> <li>Sending or displaying material that is pornographic or that reasonable people find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the Internet).</li> </ul>		
	<ul> <li>Offensive or intimidating comments or gestures, or insensitive jokes or pranks that undermine the dignity of the person.</li> </ul>		
	<ul> <li>Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic, social, linguistic or religious group, or gender.</li> </ul>		
	<ul> <li>Outing or threatening to out someone on the basis of sexual orientation or transgender status.</li> </ul>		
	<ul> <li>Shunning someone, for example, by deliberately excluding them from a conversation or a Workplace social activity, on the basis of the person's protected status or characteristic.</li> </ul>		
Sexual Harassment	Sexual harassment is 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.		
	Examples of sexually harassing behavior include:		
	unwelcome touching;     staring or logring;		
	<ul><li>staring or leering;</li><li>suggestive comments or jokes;</li></ul>		
	<ul> <li>sexually explicit pictures or posters;</li> </ul>		
	<ul> <li>unwanted invitations to go out on dates;</li> <li>requests for sex;</li> </ul>		
	<ul> <li>intrusive questions about a person's private life or body;</li> </ul>		
	<ul> <li>unnecessary familiarity, such as deliberately brushing up against a person;</li> <li>insults or taunts based on sex;</li> </ul>		
	<ul> <li>sexually explicit physical contact; and</li> </ul>		
	<ul> <li>sexually explicit emails or SMS text messages</li> <li>other unwelcome conduct of a sexual nature which makes a person feel</li> </ul>		
	offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.		
	A working environment or workplace culture that is sexually permeated or hostile can include the display of obscene or pornographic materials, general sexual		
	banter, crude conversation or innuendo and offensive jokes.		
Vilification	Vilification is when someone publicly targets a person or a group of people by inciting hatred toward them, serious contempt for them, or severe ridicule of them because of their race, religion, sexuality, or gender identity.		
Violence	Acts in the Workplace, or which have an effect upon the Workplace, of abusive or violent behavior; physical violence; sexual, emotional, and psychological intimidation; verbal abuse; stalking; and economic control that has the potential to cause physical, mental, emotional, or other harm to others. Violence in the		



Word / Phrase	Definition			
Violence (Continues)	Workplace includes such acts committed by Worley's employees, customers, contractors, or suppliers of any tier, temporary workers, relatives, visitors, or strangers against persons in the Workplace, or which has an effect upon the Workplace.			
	1. Violence in the Workplace, or which has an effect upon the Workplace, includes but is not limited to:			
	<ul> <li>Domestic violence: The use of violence between people who have an ongoing or have had a prior intimate relationship. A prior intimate relationship could include relationships between people who have been married, have cohabitated, or have had any other kind of intimate involvement.</li> </ul>			
	<ul> <li>A prior intimate relationship could include relationships between people who have been married, have cohabitated, or have had any other kind of intimate involvement.</li> </ul>			
	<ul> <li>Actual or potential intimidation: Engaging in or threatening actions that include, but are not limited to, stalking or behavior intended to frighten, coerce, or induce duress.</li> </ul>			
	<ul> <li>Physical attack: Unwanted or hostile physical contact such as hitting, fighting, pushing, shoving, or throwing objects.</li> </ul>			
	<ul> <li>Property damage: Damage to property. This includes property owned, leased by, or under the control of Worley wherever located; as well as property of Worley's employees, temporary workers, contractors, suppliers, consultants, and customers that is located on Worley's premises. It also includes any Threat of property damage.</li> </ul>			
	<ul> <li>Stalking: Willfully, maliciously and repeatedly following or harassing another person, or making a credible Threat with the intention to place that person in reasonable fear of death or great bodily injury.</li> </ul>			
	<ul> <li>Threat: The expression of intent to cause physical or mental harm. An expression constitutes a Threat without regard to whether the party communicating the Threat has the present ability to carry it out and without regard to whether the expression is contingent, conditional, or future.</li> </ul>			
Workplace	<ul> <li>Any location, either permanent or temporary, where an employee performs any work-related duties. It can also include any place where employees carry out work like activities in connection with their role as an employee and/or when using Worley's resources. Buildings and surrounding perimeters, including parking lots, field locations, and alternate work locations.</li> </ul>			
	<ul> <li>Work-related travel locations and events, such as airports, hotels, restaurants, or other transit locations.</li> </ul>			
	<ul> <li>Company-owned, leased, or rented vehicle, or employee's vehicle while conducting Company business.</li> </ul>			
Worley	The Worley Engineering Group Inc. group family of companies (collectively, "Worley" or "the Company").			
Standard (capitalized)	Used within a given Worley standard document (e.g., "this Standard") refers to that specific standard document.			



## 6. References

Document Number	Document Name
MS-CX-STD-0004	Code of Conduct Standard
MS-HR-POL-0015	Respectful Workplace Behavior Policy

## **Revision History**

Rev No	Rev Date	Description of Change	IS ID
Rev 2	04- December- 2023	Suggested improvements/wording changes to the Bullying and Harassment Standard to align with messaging of Respectful Workplace Behavior Policy.	3171
Rev 1A	04- September- 2023	As part of Global Psychosocial Hazard and Risk program, this document has been updated to align with ISO 45003, the international standard for managing psychosocial risks and promoting psychological health and safety in the workplace. This document has been revised to include 'victimization', update definition of 'sexual harassment' etc.	1954
Rev 1	01-July-2021	Added reference to Employee Assistance Program (EAP) support.	322