

ADCORP HOLDINGS LIMITED – FITNESS FOR WORK POLICY



Process Area	Human Resources	Policy Owner:	Head: AHA People and Culture
Policy Title:	Fitness for Work	Revision No.:	1
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This policy is applicable to the Adcorp Group of companies, its affiliates and subsidiaries in Australia in which it operates hereinafter referred to as "Adcorp".

Policy Summary:

The Fitness for Work Policy establishes Adcorp's commitment as a Person Conducting a Business or Undertaking (PCBU) to providing a healthy and safe work environment by ensuring all personnel can perform their duties without risk to themselves or others. The policy provides a consistent framework for managing factors that impact functional capacity, including fatigue, illness, injury, and the influence of drugs or alcohol. It outlines shared responsibilities where employees must present for work in a fit state and notify management of any impairments, while Adcorp commits to exploring reasonable adjustments that do not cause unjustifiable hardship. Operating under the Work Health and Safety Act 2011 (Cth) and the Disability Discrimination Act 1992 (Cth), the policy prioritizes medical evidence as the basis for assessment and includes clear protocols for phased returns to work and the protection of sensitive medical privacy.

Approved by:

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1. POLICY STATEMENT

Adcorp, as a Person Conducting a Business or Undertaking (PCBU), is committed to providing a healthy and safe work environment for all employees, contractors, and visitors. This policy outlines our approach to managing fitness for work, which is the state in which an employee is able to perform their job duties safely and effectively, without posing a risk to themselves or others. This policy addresses a range of factors that can impact an individual's fitness for work, including but not limited to, fatigue, illness, injury, and the influence of drugs or alcohol.

The purpose of this policy is to:

- Fulfill our legal obligations under work health and safety legislation.
- Protect the health and safety of all personnel.
- Provide a consistent and fair framework for managing situations where an employee's fitness for work is in question.
- Support employees who may be experiencing a condition that impacts their ability to work safely.

2. SCOPE

This policy applies to all Adcorp employees, including those on fixed-term and casual contracts, as well as contractors and agency staff ("personnel"). It covers all work-related activities, whether performed on company premises, at a client site, or while working remotely.

3. EMPLOYEE RESPONSIBILITIES

All Adcorp personnel have a responsibility to:

- Present for work in a fit and healthy state to perform their duties safely.
- Take reasonable care for their own health and safety and ensure their actions do not adversely affect the health and safety of others.
- Notify their manager or supervisor as soon as practicable if they believe they are not fit for work due to any reason, including illness, injury, fatigue, or the effects of medication.
- Provide medical documentation, such as a medical certificate or a "Statement of Fitness for Work," as required by their manager to confirm their capacity to perform their duties.
- Cooperate with any reasonable adjustments that may be required to enable them to perform their role safely.

Employees are not obligated to disclose full diagnoses—only the functional impact on their work. This avoids breaching privacy expectations and complies with DDA confidentiality principles.

4. MANAGEMENT'S RESPONSIBILITIES

Adcorp managers and supervisors are responsible for:

- Ensuring a safe working environment and, so far as is reasonably practicable, eliminating or minimising risks to health and safety.
- Consulting with employees when a legitimate concern of fitness for work issue is identified.
- Taking appropriate and lawful action when an employee's fitness for work is in question. This may include requesting a medical assessment, providing reasonable adjustments to the role, or, in serious cases, standing the employee down.
- Maintaining the confidentiality of all medical and personal information provided by an employee. Medical information will be stored securely and only accessible to authorised personnel.
- Providing access to support services, such as the Employee Assistance Program (EAP), where appropriate.

5. MANAGING FITNESS FOR WORK

5.1. Fatigue

As a predominantly office-based company, fatigue can still pose a risk to health and safety. Employees are required to manage their own fatigue and report any concerns to their manager. Adcorp will take reasonable steps to manage fatigue, such as ensuring employees take scheduled breaks and do not work excessive hours without prior agreement.

To reduce the risk of fatigue and support employee wellbeing, Adcorp encourages all personnel to:

- Take regular rest breaks, including a minimum of one 10–15 minute break every 2–3 hours of continuous screen-based work, in addition to scheduled meal breaks.
- Avoid working excessively long hours without approval or consultation with their manager.
- Refrain from performing work outside their normal hours unless necessary and pre-approved.

Where an employee is experiencing ongoing fatigue, or feels their workload is unsustainable, they must notify their manager as soon as practicable. Managers are responsible for assessing the situation and may:

- Reallocate or reschedule tasks to manage workload.
- Encourage leave where appropriate.
- Refer the employee to the Employee Assistance Program (EAP) or medical support services.
- Adjust work hours or duties temporarily, in consultation with the employee.

Persistent fatigue issues will be addressed through a collaborative process with the goal of ensuring the employee's safety and long-term fitness for work.

5.2. Drugs and Alcohol

Adcorp has a zero-tolerance policy for employees attending work under the influence of drugs or alcohol where it affects their ability to perform their duties safely and effectively. Personnel

suspected of being under the influence of drugs or alcohol will be stood down immediately and sent home in a safe manner, at their own expense. This will be subject to an investigation, and disciplinary action may follow.

Any action (stand-down, disciplinary) will be based on objective evidence and may involve supporting documentation or assessment.

Transport will be arranged at Adcorp's discretion to protect the safety of the employee.

5.3. Medical Conditions and Reasonable Adjustments

Where an employee has a medical condition, including a mental health condition, or an injury that may impact their ability to perform the inherent requirements of their role, they must notify their manager.

Adcorp will engage in a collaborative process with the employee and, where appropriate, their treating medical practitioner to:

Understand the nature of the condition and its impact on their ability to perform the "inherent requirements" of the job.

Explore reasonable adjustments that could be made to the role or work environment to enable them to work safely. These adjustments will not cause Adcorp "unjustifiable hardship."

Request a medical assessment at the company's expense if there are reasonable concerns about the employee's fitness for work and their medical information is insufficient or unclear.

Mental Health conditions are treated equally under Disability Discrimination Act 1992 (Cth).

5.4. Return to Work

Following an injury or extended absence due to illness, employees must provide a medical clearance or a "Statement of Fitness for Work" before returning. Adcorp is committed to facilitating a safe and timely return to work, which may include a phased return and/or temporary modified duties, in consultation with the employee and their medical practitioner.

6. MANAGING CONFLICTS BETWEEN MEDICAL ADVICE AND EMPLOYEE PREFERENCE

6.1 Guiding Principles

- Adcorp must not expose employees or others to foreseeable risks arising from a known medical condition.
- Medical advice forms the primary basis for assessing fitness for work.
- Employee preference alone is not sufficient to override medical restrictions.
- Adjustments and decisions should be made through a collaborative and evidence-based process.
- Privacy of personal medical information must be maintained.

6.2 Temporary restriction Pending Clarification

Where medical documentation recommends remote work or restricted duties:

- The medical advice is treated as the default operating position.
- The employee must continue to follow the medical recommendation until further clarification is received.
- Managers are not permitted to approve attendance or duties that conflict with the current medical advice.

6.3 Obtaining updated medical clarification

If the employee believes they are capable of attending the workplace or performing additional duties, they must provide updated medical information that answers the following:

- "Is the employee medically fit to attend the workplace, and if so, under what conditions, restrictions or adjustments?"

This should focus on functional capacity, not diagnosis.

- Examples include limits to standing, lifting, driving, stress exposure, duration of attendance, or hours of work.

Adcorp may request additional clarification from the treating practitioner if advice is vague or inconsistent.

6.4 Manager assessment and risk review

Upon receiving updated medical guidance, the manager must complete a short risk assessment considering:

- the inherent requirements of the role
- the nature of the medical condition
- possible impact on the employee's health or safety
- possible impact on other workers or clients

- any temporary adjustments required
- operational risks or constraints

If risks cannot be eliminated or controlled to a reasonably practicable level, workplace attendance may be declined until safe to do so.

6.5 Temporary fit for work plan

If attendance is approved based on updated medical advice, a temporary plan must be developed. The plan should include:

- permitted duties
- any restrictions
- required adjustments or controls
- location of work (onsite, remote, hybrid)
- review dates (usually weekly or fortnightly)
- manager check-in requirements
- triggers for review (symptoms worsening, fatigue, new medication, etc.)

Both manager and employee should agree on the plan. It is not a contract; it is a safety control.

6.6 Right to decline attendance

Adcorp may decline workplace attendance in the following circumstances:

- medical exclusion or clear direction to avoid the workplace
- insufficient or unclear medical information
- inability to implement safe adjustments
- concern that attendance presents elevated WHS risk
- evidence that the employee's condition is deteriorating

Managers must explain the decision clearly and refer the employee to support options such as EAP.

7. POLICY REVIEW

This policy will be reviewed periodically or as required, to ensure its ongoing effectiveness and compliance with legislative changes.

8. DOCUMENT HISTORY

The following table lists the changes made to this document:

Version	Date	Author	Change
1.0	3/12/2025		Original document

ANNEXURE A – RELATED DOCUMENTATION AND LEGISLATION

This policy should be read in conjunction with the following legislation and other Adcorp policies and documentation:

Australia:

Legislation applicable to Australia:

Work Health and Safety Act 2011 (Cth): This is the overarching federal legislation that establishes the general duties of PCBUs to ensure the health and safety of workers.

Fair Work Act 2009 (Cth): This act is crucial for ensuring that an employer's actions are not discriminatory or unlawful. Key sections include those related to general protections and unfair dismissal.

Disability Discrimination Act 1992 (Cth): This is the principal federal legislation prohibiting discrimination on the basis of disability and mandating the provision of "reasonable adjustments."

Privacy Act 1988 (Cth): While an exemption applies to some employee records, this act provides a strong framework for ensuring that sensitive personal and medical information is handled appropriately and confidentially.

State and Territory Legislation

Work Health and Safety Acts: Each state and territory has its own WHS legislation, which largely mirrors the federal Act but may have specific variations.

New South Wales: Work Health and Safety Act 2011 (NSW)

Victoria: Occupational Health and Safety Act 2004 (Vic)

Queensland: Work Health and Safety Act 2011 (Qld)

Western Australia: Occupational Safety and Health Act 1984 (WA)

South Australia: Work Health and Safety Act 2012 (SA)

Tasmania: Work Health and Safety Act 2012 (Tas)

Australian Capital Territory: Work Health and Safety Act 2011 (ACT)

Northern Territory: Work Health and Safety (National Uniform Legislation) Act 2011 (NT)

Anti-Discrimination Legislation:

Each state and territory also has its own anti-discrimination legislation, which complements the federal DDA.

New South Wales: Anti-Discrimination Act 1977 (NSW)

Victoria: Equal Opportunity Act 2010 (Vic)

Queensland: Anti-Discrimination Act 1991 (Qld)

Western Australia: Equal Opportunity Act 1984 (WA)

South Australia: Equal Opportunity Act 1984 (SA)

Tasmania: Anti-Discrimination Act 1998 (Tas)

Australian Capital Territory: Discrimination Act 1991 (ACT)

Northern Territory: Anti-Discrimination Act 1992 (NT)