

ADCORP HOLDINGS LIMITED – PSYCHOSOCIAL POLICY

Process Area	Health and Safety	Policy Owner:	Head: AHA People and Culture
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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 Psychosocial Policy establishes Adcorp's framework for protecting the psychological health and safety of all workers, contractors, and visitors in alignment with the Work Health and Safety (WHS) Act 2011 (Cth) and the Safe Work Australia Model Code of Practice. As the Person Conducting a Business or Undertaking (PCBU), Adcorp fulfills its primary duty of care by adopting a systematic four-step risk management process to identify, assess, control, and review psychosocial hazards such as high job demands, low control, and harmful workplace behaviors. The policy mandates a collaborative ownership model between Workplace Health and Safety (WHS) and People & Culture (P&C), ensuring that systemic risks are managed alongside individual employee support and wellbeing programs. By embedding psychosocial safety into the organizational culture and maintaining robust reporting and consultation mechanisms, Adcorp aims to meet its evolving legislative obligations across all Australian jurisdictions.

CONTENTS

1. INTRODUCTION AND COMMITMENT	3
2. BEST PRACTICE IN AUSTRALIA	3
3. FORMAL REPORTING MECHANISMS IN AUSTRALIA FOR EMPLOYEES TO RAISE CONCERNS REGARDING PSYCHOSOCIAL RISKS	4
4. ADCORP'S POSITION REGARDING THE OWNERSHIP OF PSYCHOSOCIAL RISKS BY EITHER P&C OR WORKPLACE HEALTH AND SAFETY	5
5. HOW ADCORP INTENDS TO COMPLY WITH ITS OBLIGATIONS UNDER THE NEW REGULATIONS ...	6
6. WHETHER ADCORP HAS FULFILLED ITS DUTIES AS AN EMPLOYER UNDER THE NEW REGULATIONS	7
7. DOCUMENT HISTORY	Error! Bookmark not defined.
Annexure A – RELATED DOCUMENTATION AND LEGISLATION.....	9

1. INTRODUCTION AND COMMITMENT

Adcorp is committed to providing a safe and healthy workplace for all its employees, contractors, and visitors. This commitment extends to ensuring both physical and psychological health and safety. We recognise that psychosocial hazards can have a significant impact on an individual's wellbeing and the overall work environment.

This policy outlines Adcorp's approach to identifying, assessing, controlling, and reviewing psychosocial risks in accordance with current Australian Work Health and Safety (WHS) legislation and best practices.

2. BEST PRACTICE IN AUSTRALIA

Adcorp's Psychosocial Policy is guided by the Work Health and Safety (WHS) Act 2011 (Cth) and relevant state/territory WHS Regulations, as well as the Safe Work Australia Model Code of Practice: Managing Psychosocial Hazards at Work. We acknowledge that:

Primary Duty of Care: As a Person Conducting a Business or Undertaking (PCBU), Adcorp has a primary duty to ensure, so far as is reasonably practicable, the health and safety of its workers and others, including psychological health.

Risk Management Approach: We will adopt a systematic four-step risk management process for psychosocial hazards:

Identify Hazards: Proactively identify reasonably foreseeable psychosocial hazards that could give rise to health and safety risks. This includes considering factors such as:

- Job demands (e.g., high workload, time pressure, emotional demands)
- Low job control
- Poor support (from supervisors or colleagues)
- Lack of role clarity
- Poor organisational change management
- Inadequate reward and recognition
- Poor organisational justice
- Traumatic events or material
- Remote or isolated work

Poor physical environment (e.g., unpleasant, poor quality, or hazardous conditions)

Harmful behaviours (e.g., bullying, harassment, violence, aggression, discrimination, misconduct)

Conflict or poor workplace relationships and interactions

Assess Risks: Assess the likelihood and consequence of harm from identified psychosocial hazards.

Control Risks: Implement control measures to eliminate psychosocial risks so far as is reasonably practicable, or if not reasonably practicable, minimise them so far as is reasonably practicable. This will follow the hierarchy of controls:

Elimination: Remove the hazard entirely (e.g., redesigning a process to remove a source of high emotional demand).

Substitution: Replace the hazard with a safer alternative.

Engineering Controls: Redesign the work environment or systems (e.g., implementing clear communication channels, improving workflow).

Administrative Controls: Implement safe work procedures, policies, training, and supervision (e.g., flexible work arrangements, mental health first aid training).

Personal Protective Equipment (PPE): (Less relevant for most psychosocial risks but could include personal alarms for isolated workers facing aggression risks).

Review Controls: Regularly review and, if necessary, revise control measures to ensure their ongoing effectiveness.

Consultation: Adcorp will consult with workers and Health and Safety Representatives (HSRs) on all aspects of psychosocial risk management, including identifying hazards, assessing risks, developing control measures, and reviewing their effectiveness.

Training and Information: Adcorp will provide appropriate information, training, instruction, and supervision to workers and managers on psychosocial hazards, risks, and control measures, as well as how to report concerns.

Compliance Codes: Adcorp will adhere to any specific state/territory compliance codes or guidelines related to psychosocial hazards, such as those being introduced in Victoria and Queensland for certain hazards like sexual harassment and bullying.

3. FORMAL REPORTING MECHANISMS IN AUSTRALIA FOR EMPLOYEES TO RAISE CONCERNS REGARDING PSYCHOSOCIAL RISKS

Adcorp is committed to fostering a culture where employees feel safe and supported to raise concerns about psychosocial risks without fear of victimisation. Our formal reporting mechanisms include:

Direct to Supervisor/Manager: Employees are encouraged to discuss concerns directly with their immediate supervisor or manager in the first instance.

People & Culture (P&C) Department: Employees can report concerns directly to the HR department, who are equipped to handle sensitive matters with confidentiality and professionalism.

Workplace Health and Safety (WHS): Employees can raise concerns with their designated WHS Representative or WHS Officer.

Anonymous Reporting (if applicable): Adcorp will consider and implement, where appropriate and feasible, an anonymous reporting mechanism (e.g., an external hotline or online platform) to allow individuals to report concerns without disclosing their identity.

Complaints and Grievance Policy: Adcorp's existing Complaints and Grievance Policy will include specific provisions for addressing psychosocial concerns, outlining the investigation process, confidentiality measures, and support available to all parties.

External Bodies: Employees are also informed of their right to report serious WHS breaches or concerns directly to the relevant state/territory WHS regulator (e.g., State based Safe Work bodies) if they believe their concerns are not being adequately addressed internally.

4. ADCORP'S POSITION REGARDING THE OWNERSHIP OF PSYCHOSOCIAL RISKS BY EITHER P&C OR WORKPLACE HEALTH AND SAFETY

Adcorp takes a shared ownership and collaborative approach to managing psychosocial risks, with both People & Culture (P&C) and Workplace Health and Safety (WHS) playing distinct but complementary roles.

Workplace Health and Safety (WHS) Department/Function:

Primary Responsibility: The WHS function holds the primary responsibility for the risk management process of psychosocial hazards. This includes:

- Developing and maintaining the Psychosocial Risk Management Policy and procedures.
- Conducting psychosocial hazard identification and risk assessments.
- Recommending and overseeing the implementation of control measures (e.g., work design changes, system improvements).
- Monitoring and reviewing the effectiveness of control measures.
- Providing WHS-specific training on psychosocial risk management.
- Investigating WHS incidents related to psychosocial harm.
- Ensuring compliance with WHS legislation and codes of practice.

Focus: The WHS focus is on the systemic prevention of harm arising from work-related psychosocial hazards.

People & Culture (P&C) Department:

Key Support Role: P&C plays a crucial support and operational role in managing psychosocial risks, particularly concerning:

Policy Development and Implementation: Collaborating with WHS on developing and implementing policies that address workplace behaviour, mental health, and employee support systems (e.g., anti-bullying, harassment, discrimination policies).

Employee Support and Wellbeing Programs: Designing and implementing programs that promote overall employee wellbeing, including Employee Assistance Programs (EAPs), mental health awareness initiatives, and work-life balance strategies.

Individual Case Management: Managing individual employee concerns, grievances, and complaints related to psychosocial issues, including workplace investigations where appropriate, ensuring fair and respectful processes.

Training and Development: Delivering training on respectful workplace behaviours, communication skills, and supporting managers in managing their teams' wellbeing.

Performance Management and Conflict Resolution: Providing guidance and support in managing performance and resolving workplace conflicts in a way that minimises psychosocial risk.

Return to Work: Supporting employees returning to work after a psychological injury or illness.

Focus: The People & Culture focus is on people management, culture, and individual support within the framework of psychosocial safety.

Collaboration is essential: Both HR and WHS will work closely together, sharing information (while respecting privacy), collaborating on risk assessments, incident investigations, and the development and review of integrated control measures. This ensures a holistic and effective approach to managing psychosocial risks at Adcorp. Senior leadership will provide clear direction and support for this collaborative model.

5. HOW ADCORP INTENDS TO COMPLY WITH ITS OBLIGATIONS UNDER THE NEW REGULATIONS

Adcorp is proactively preparing for and intends to comply fully with its obligations under the new psychosocial regulations by:

Updating Policies and Procedures: Reviewing and updating all relevant WHS policies and procedures, including this Psychosocial Policy, to align with the specific requirements of the new regulations and associated codes of practice in each jurisdiction where Adcorp operates.

Conducting Comprehensive Risk Assessments: Implementing a program of regular and comprehensive psychosocial risk assessments across all departments and roles. This will involve:

- Utilising various methods such as employee surveys, focus groups, interviews, and analysis of existing data (e.g., incident reports, absenteeism rates).
- Actively consulting with workers and HSRs throughout the assessment process.

Implementing and Reviewing Control Measures: Developing and implementing a hierarchy of control measures to eliminate or minimise identified psychosocial risks. This will involve:

- Prioritising higher-level controls (e.g., work redesign, improving organisational systems).
- Developing specific prevention plans for high-risk psychosocial hazards where required by legislation (e.g., bullying, sexual harassment, high job demands).
- Regularly reviewing the effectiveness of these controls and making adjustments as needed.

Training and Awareness Programs: Rolling out targeted training programs for:

Leaders and Managers: To equip them with the knowledge and skills to identify, assess, and manage psychosocial risks within their teams, respond to concerns, and foster a mentally healthy workplace.

All Employees: To raise awareness of psychosocial hazards, their potential impact, Adcorp's policy, and how to report concerns.

Enhancing Reporting and Response Systems: Strengthening existing reporting mechanisms to ensure they are accessible, trusted, and responsive. This includes:

- Clearly communicating reporting channels to all employees.
- Ensuring prompt and thorough investigation of all reported concerns.
- Providing appropriate support to individuals involved in reported incidents.
- Maintaining confidential and accurate records.

Embedding Psychosocial Safety into Organisational Culture: Promoting a culture of psychological safety where open communication, early intervention, and mutual respect are valued. This includes:

- Leadership commitment and visible support for psychosocial safety initiatives.
- Integrating psychosocial risk management into performance reviews and continuous improvement processes.

Allocating Resources: Ensuring adequate resources (financial, human, and time) are allocated to effectively implement and maintain the psychosocial risk management framework.

Monitoring and Reporting: Establishing clear metrics and regular reporting mechanisms to monitor the effectiveness of Adcorp's psychosocial risk management efforts and report to senior management and the Board where appropriate.

6. WHETHER ADCORP HAS FULFILLED ITS DUTIES AS AN EMPLOYER UNDER THE NEW REGULATIONS

Adcorp understands that fulfilling its duties as an employer under the new regulations is an ongoing commitment, not a one-time achievement. Adcorp will demonstrate its fulfillment of these duties through:

Evidence of Proactive Risk Management: Maintaining documented evidence of:

- Systematic identification of psychosocial hazards.
- Thorough risk assessments.
- Implementation of control measures, including a clear rationale for the chosen controls (especially if lower-level controls are used).
- Regular review of control measure effectiveness.
- Robust Consultation Records: Keeping comprehensive records of consultation with workers and HSRs on all aspects of psychosocial risk management.
- Training Records: Documenting all training provided to employees and managers on psychosocial hazards, risks, and the policy.

Effective Reporting and Response: Demonstrating that:

- Employees are aware of and utilise reporting mechanisms.
- Concerns are promptly addressed, investigated, and appropriate actions taken.
- Support is provided to those impacted.
- There is no evidence of victimisation for raising concerns.

Continuous Improvement: Regularly reviewing the effectiveness of the overall psychosocial risk management system, including this policy, and making adjustments based on:

- Feedback from employees and employee representatives.
- Results of risk assessments and incident investigations.
- Changes in legislation or best practice.
- Emerging trends in psychosocial health.
- Leadership Engagement: Demonstrating active engagement and commitment from Adcorp's senior leadership in promoting and resourcing psychosocial safety.

Compliance Audits: Conducting internal or external audits of the psychosocial risk management system to verify compliance and identify areas for improvement.

By consistently applying these principles and processes, Adcorp aims to not only comply with its legal obligations but also to foster a truly safe, supportive, and psychologically healthy workplace for all.

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:

1. Commonwealth (Federal) Legislation:

Work Health and Safety Act 2011 (Cth): This is the foundational piece of legislation. It establishes the primary duty of care for Persons Conducting a Business or Undertaking (PCBUs) to ensure, so far as is reasonably practicable, the health and safety of workers and others. Crucially, "health" is defined to include psychological health. This means that the general duties under the WHS Act apply equally to psychological as well as physical health and safety.

Work Health and Safety Regulations 2011 (Cth): These regulations provide more specific detail on how to comply with the duties under the WHS Act.

Part 3.1 - General Risk Management: This part outlines the general risk management process (identify, assess, control, review) that applies to all hazards, including psychosocial hazards.

Regulations 55A to 55D (specifically for Psychosocial Hazards): These were introduced to explicitly address psychosocial risks. They define "psychosocial hazard" and "psychosocial risk" and outline specific requirements for PCBUs to:

Identify reasonably foreseeable psychosocial hazards that could give rise to health and safety risks.

Implement control measures to eliminate or, if not reasonably practicable, minimise these risks, applying the hierarchy of controls.

Consider specific factors when determining control measures, such as the duration, frequency, and severity of exposure, how hazards interact, and the design/systems of work.

Work Health and Safety (Managing Psychosocial Hazards at Work) Code of Practice 2024 (Cth): This is an approved code of practice under the WHS Act. While codes of practice are not legally binding in the same way as the Act or Regulations, they provide practical guidance on how to achieve compliance with the duties. Courts may refer to codes of practice as evidence of what is "reasonably practicable" in managing risks.

Work Health and Safety (Sexual and Gender-based Harassment) Code of Practice 2025 (Cth): This is a newer specific code addressing these particular psychosocial hazards.

2. State and Territory Legislation (Harmonised WHS Laws):

Most Australian states and territories have adopted the Model Work Health and Safety (WHS) laws developed by Safe Work Australia. This means their WHS Acts and Regulations largely mirror the Commonwealth legislation, including the recent amendments specifically addressing psychosocial risks.

As of late 2024/early 2025, most jurisdictions have either fully adopted or are in the process of adopting the model psychosocial regulations and codes of practice. However, there can be minor variations and different commencement dates for specific regulations and codes.

Key Legislation in Each Jurisdiction (applying the Model WHS Laws, with specific amendments for psychosocial risks):

New South Wales (NSW):

Work Health and Safety Act 2011 (NSW)
Work Health and Safety Regulation 2017 (NSW) (including specific psychosocial risk regulations introduced in October 2022)
Code of Practice: Managing psychosocial hazards at work (NSW)

Queensland (QLD):

Work Health and Safety Act 2011 (QLD)

Work Health and Safety Regulation 2011 (QLD) (including the Work Health and Safety (Psychosocial Risks) Amendment Regulation 2022)
Managing the risk of psychosocial hazards at work Code of Practice 2022 (QLD)

Western Australia (WA):

Work Health and Safety Act 2020 (WA)

Work Health and Safety (General) Regulations 2022 (WA) (including psychosocial risk provisions effective December 2022)
Code of Practice: Psychosocial Hazards in the workplace (WA)

South Australia (SA):

Work Health and Safety Act 2012 (SA)

Work Health and Safety Regulations 2012 (SA) (including the Work Health and Safety (Psychosocial Risks) Amendment Regulations 2023)
Aligned with the Safe Work Australia Model Code of Practice

Tasmania (TAS):

Work Health and Safety Act 2012 (TAS)

Work Health and Safety Regulations 2022 (TAS)
Aligned with the Safe Work Australia Model Code of Practice

Australian Capital Territory (ACT):

Work Health and Safety Act 2011 (ACT)

Work Health and Safety Regulation 2011 (ACT) (including specific psychosocial risk provisions effective November 2023)
Work Health and Safety (Managing Psychosocial Hazards at Work Code of Practice) Approval 2023 (ACT)

Northern Territory (NT):

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

Work Health and Safety (National Uniform Legislation) Regulations 2011 (NT)
Aligned with the Safe Work Australia Model Code of Practice

3. Victoria (Non-Harmonised Jurisdiction):

Victoria has its own distinct WHS legislation and has not adopted the harmonised WHS laws. Occupational Health and Safety Act 2004 (Vic): Similar to the WHS Act, this Act requires employers to provide a safe working environment, and "health" is defined to include psychological health.

Occupational Health and Safety Regulations 2017 (Vic): While Victoria previously addressed psychosocial risks under its general duties, it is introducing specific regulations.

Occupational Health and Safety (Psychological Health) Regulations: These new regulations are expected to be fully in force by 1 December 2025. They will create specific duties for Victorian employers to identify and control psychosocial hazards, with a focus on risk management. There will also be a supporting compliance code. These regulations may also include specific requirements for "prevention plans" for certain high-risk hazards (e.g., aggression, bullying, sexual harassment, high job demands, exposure to traumatic content).