



Sugar and Renewables



## Sexual Harassment Prevention Plan

Managing the risk of sexual harassment and sex or gender-based harassment in our workplace

18/08/2025

For Co

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## 1. Introduction

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At Wilmar Sugar and Renewables, we work as One Team — and we have Zero Tolerance for unsafe or disrespectful behaviour. Zero Tolerance does not mean every breach leads to the same outcome. It means every concern will be taken seriously, assessed on the facts, and addressed through a fair, consistent, and proportionate response in line with our legal obligations.

Sexual harassment, sex-based harassment, and gender-based harassment are unacceptable. These behaviours cause real harm to individuals, damage team trust, and affect our ability to operate safely and effectively. Addressing harassment is part of how we keep our teams safe, productive, and working well together. Just like physical safety, respect at work is essential for operational reliability and trust.

Preventing this conduct is more than a legal requirement under the Sex Discrimination Act 1984 and the Work Health and Safety Regulation 2011. It is also how we live our values of safety, integrity, and respect every day. It supports our positive duty under the Respect@Work reforms to eliminate harassment, discrimination, and victimisation as far as reasonably practicable.

This plan addresses unlawful sexual, sex-based, and gender-based harassment, as well as inappropriate or harmful conduct that can arise where there are power imbalances, minority group status, or other vulnerabilities. This includes behaviour targeting people because of their cultural background, sexual orientation, gender identity, disability, age, or employment status (such as casual, apprentice, or visa workers). It also recognises that psychosocial risks — such as hostile environments, isolation, or unchecked poor behaviour — are workplace health and safety risks that must be actively controlled.

Harassment can happen to anyone. National data and Wilmar's own risk assessments show that certain work environments create higher risks for some groups, including women in male-dominated industries like ours. These risks do not mean other experiences are ignored. Men can and do experience harassment, and may face additional barriers to speaking up. Our focus is on managing risks where they are highest, which strengthens protections for everyone.

This plan sets out how we identify and manage risks, implement control measures, and ensure clear, accessible reporting pathways. It combines leadership, education, active risk management, and workforce involvement so that prevention is part of how we work, not just a complaints process.

## 2. Purpose

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The purpose of this plan is to make harassment prevention a deliberate and embedded part of Wilmar Sugar and Renewables' operations. It sets out reasonable, proportionate measures to meet our positive duty under the Sex Discrimination Act 1984 and our obligations under the Work Health and Safety Regulation 2011. These measures protect people, strengthen culture, and support safe, respectful workplaces across all operations.

This plan also builds workforce trust by making respect and accountability a shared standard, not just an HR requirement.

Specifically, this plan aims to:

- Ensure every Wilmar site, workgroup, and contractor understands expected standards of behaviour and the consequences of breaching them
- Provide clear, accessible processes so anyone can raise concerns at any stage without fear of victimisation
- Equip leaders at all levels to recognise risks early, take timely and proportionate action, and follow consistent response pathways
- Integrate harassment risk management into Wilmar's broader safety system, alongside physical and

- psychosocial hazard controls
- Foster a culture of One Team, Zero Tolerance where respect, accountability, and safety are visible in daily operations
- Monitor the effectiveness of prevention activities through data, consultation, and review, and adjust controls as risks or workforce needs change

This plan is a control measure within Wilmar's broader psychosocial hazard risk management framework, consistent with the *Managing the risk of psychosocial hazards at work Code of Practice 2022*. It is an integrated element of the WHS framework, not a standalone HR policy.

### 3. Scope

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Wilmar's standard for safe and respectful behaviour applies wherever we work or represent the company — on site, travelling, or at industry events. This plan applies to all people engaged with Wilmar Sugar and Renewables in any capacity, including:

- Permanent, temporary, and casual employees
- Apprentices, trainees, and interns
- Contractors, labour hire workers, and their employees
- Service providers, suppliers, consultants, and growers when on site
- Visitors and third parties who enter or interact with our workplaces

This plan applies to conduct occurring:

- At all Wilmar workplaces and operations, including sites we own, operate, or control (such as mills, refineries, transport centres, farms, Yarraville, and Oonooie) and any other location where Wilmar work is undertaken
- At third-party sites where Wilmar personnel are performing work or representing the company (e.g. grower locations, supplier premises, industry events)
- In accommodation or shared facilities provided by Wilmar or its contractors, and during work-related travel
- In digital work environments used for work purposes, including email, messaging platforms, video conferencing, and work-related social media
- At work-related events, training, meetings, or social functions, whether on-site or off-site
- In situations outside normal work hours where conduct has a clear connection to Wilmar operations or impacts the work environment or employment relationships.

### 4. Risk Factors & Workforce Profile

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Harassment can occur in any workplace, but some groups face higher risks due to the nature of their work, the environments they operate in, or their employment arrangements.

#### 4.1 Higher Risk Groups

Risk is often heightened where there are:

- Imbalances of power or authority
- Work environments where individuals are under-represented
- Employment arrangements that create uncertainty or dependency
- Greater exposure to isolated or high-risk settings

At Wilmar, these risk factors overlap with our 2025 workforce profile:

- 22% of our workforce is female in a male-dominated environment
- 6% are under 21, reflecting a less experienced cohort
- 30% are temporary workers and 13% are entry-level (including apprentices and graduates), indicating

- groups with less job security
- 4% are contractors and external workers, creating additional oversight needs when third-party labour operates on our sites
- 3% are international workers, bringing cultural and language considerations
- Aboriginal and Torres Strait Islander employees, LGBTIQ+ workers, and employees from culturally and linguistically diverse backgrounds are present across our operations
- 2% work remotely on farms, creating greater isolation risk

In our industry, risk is often heightened for employees in the minority on a crew, working in unfamiliar or isolated environments, or relying on others for continued employment. While these factors may concentrate risk for certain groups, controls in these areas strengthen protections for everyone.

## 5. Definitions

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For the purposes of this prevention plan, *sexual harassment and related conduct* includes three forms of unlawful behaviour under the *Sex Discrimination Act 1984*:

- Sexual harassment
- Sex-based harassment
- Gender-based harassment (including conduct targeting gender identity or expression)

These behaviours are distinct but may overlap. All are prohibited and addressed in this plan through risk identification, controls, and response measures.

### 5.1 Sexual Harassment

Unwelcome conduct of a sexual nature, where a reasonable person would expect the conduct could offend, humiliate, or intimidate. Examples include:

- Unwanted touching, hugging, or kissing
- Sexual jokes, innuendo, or comments about someone's appearance
- Sharing sexually explicit material
- Repeated unwelcome invitations to go on a date

### 5.2 Sex-Based Harassment

Unwelcome conduct of a seriously demeaning nature based on a person's sex, in circumstances where a reasonable person would expect the conduct could offend, humiliate, or intimidate. Examples include:

- Comments suggesting women are not suited to technical or leadership roles
- Mocking a man for expressing emotions or taking carer's leave
- Telling someone they should act more "like a man" or "like a lady"

### 5.3 Gender-Based Harassment

Unwelcome behaviour that targets a person because of their gender, gender identity, or gender expression. Examples include:

- Ridiculing someone for not conforming to traditional male or female roles
- Making negative remarks about transgender or non-binary people

Excluding someone from work activities because of how they express their gender

## 6. Prevention Activities & Controls

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Wilmar Sugar and Renewables will take all reasonable and proportionate steps to eliminate or minimise the risk of sexual, sex-based, and gender-based harassment, as far as is reasonably practicable.

In managing psychosocial hazards, Wilmar applies the hierarchy of controls, prioritising elimination where possible, then applying safer systems of work, engineering and administrative controls, and supporting measures such as training, information, and supervision.

These controls are embedded into our safety systems, leadership practices, and workforce engagement so that prevention is part of daily operations, not just a policy statement. Our prevention activities and controls include:

## 6.1 Risk Identification & Monitoring

- Conduct site-level harassment risk assessments as part of the broader WHS psychosocial hazard management program.
- Review work design factors that may increase risk (e.g. isolated work, high-risk rosters, limited supervision, power imbalances).
- Analyse workforce composition and operational environments to identify higher-risk groups or situations.
- Monitor incident reports, complaints, and near misses for emerging trends or control gaps.
- Apply additional controls in isolated or high-risk settings, such as scheduled check-ins, supervisor presence, and environmental adjustments where feasible.
- Table review outcomes and improvement actions at the WHS Committee and include them in safety reports to the Senior Leadership Team.

## 6.2 Consultation Mechanisms

Wilmar Sugar and Renewables maintains structured consultation processes to identify, assess, and manage harassment risks. Consultation is embedded into daily operations through:

- Site safety meetings, toolbox talks, and operational forums
- Pre-start discussions and risk assessments
- Annual workforce surveys, focus groups, and targeted engagement with higher-risk workgroups
- Contractor engagement via onboarding, site safety briefings, and contract management meetings

These mechanisms ensure risks are identified early and feedback is captured to improve prevention measures.

## 6.3 Clear Standards & Policies

- Maintain this Sexual Harassment Prevention Plan, the Respect in the Workplace Standard, and supporting guidance material.
- Review and update documents in line with legal changes, operational needs, and workforce feedback.
- Ensure all policies are accessible to employees and contractors through the intranet, onboarding materials, and site postings.

## 6.4 Leadership & Accountability

- Require leaders to model respectful behaviour and take early action on inappropriate conduct.
- Integrate harassment prevention and respectful workplace leadership into KPIs and performance expectations for managers.
- Reinforce expectations regularly at leadership forums, site roadshows, and operational meetings.
- Hold leaders accountable for maintaining safe, respectful team environments, with performance reviewed through feedback, culture measures, and performance discussions.
- Ensure responses are consistent, proportionate, and in accordance with legal obligations.

## 6.5 Training & Awareness

- Provide mandatory harassment prevention training for all employees at induction and at regular

refresher intervals.

- Deliver targeted training for supervisors, managers, and higher-risk workgroups (e.g. shift teams, isolated work crews).
- Incorporate bystander training to empower employees to safely address or escalate inappropriate conduct.
- Maintain awareness year-round through toolbox talks, safety alerts, and internal campaigns.

## 6.6 Accessible Reporting Pathways

- Maintain multiple confidential channels for raising concerns (supervisors, People & Culture, Peer Support Officers, anonymous phone line).
- Encourage early reporting, even if the conduct does not meet a legal definition of harassment.
- Protect employees and contractors from victimisation or disadvantage when raising or supporting a concern.
- Ensure reports are handled promptly, fairly, and consistently.
- Manage all reports in line with procedural fairness, confidentiality requirements, and legal obligations.

## 6.7 Support & Recovery

- Provide access to a high-quality Employee Assistance Program (EAP) for complainants, witnesses, and respondents where appropriate.
- Offer practical workplace support, such as safety plans, changes in supervision, or role adjustments where required.
- Maintain confidentiality and dignity throughout the process.

## 6.8 Review & Continuous Improvement

- Review this plan following any significant incident, on request from leadership or safety functions, or at least every three years.
- Use incident data, consultation feedback, and industry developments to assess effectiveness.
- Update prevention activities to address new or emerging risks.
- Report prevention outcomes and improvements to leadership and, where appropriate, to the workforce.

## 7. Consultation

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Wilmar Sugar and Renewables will continue to consult with employees, contractors, Health and Safety Representatives (HSRs), and unions on the prevention of sexual, sex-based, and gender-based harassment. Consultation will occur through established WHS mechanisms and be:

- Held regularly via WHS Committee meetings, operational forums, toolbox talks, and engagement with at-risk workgroups
- Documented in WHS Committee minutes and site meeting records, with actions tracked to completion
- Incorporated into site risk assessment reviews to ensure harassment risks remain current in hazard registers

## 8. Feedback from Consultation

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Feedback and outcomes from consultation will be used to inform the review and continuous improvement of this plan. Outcomes will be shared back with teams so employees can see what actions have been taken in response to their input.

This ensures consultation remains an ongoing, documented process that actively shapes prevention

measures, rather than a one-off activity.

## 9. Responsibilities

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Preventing harassment requires action from everyone at Wilmar Sugar and Renewables. The plan sets the systems and controls, but its success depends on how people apply them day to day. The responsibilities below outline how prevention is actively supported at all levels.

### 9.1 All Employees

Employees are expected to:

- Follow this plan and associated workplace standards
- Complete all required training and refresher programs
- Contribute to a respectful, safe workplace by addressing or reporting concerns
- Support colleagues in raising concerns without fear of victimisation

### 9.2 Leaders & Supervisors

Leaders and supervisors are responsible for:

- Modelling respectful workplace behaviours and intervening early on inappropriate conduct
- Ensuring team members complete required training and understand expectations
- Monitoring workplace culture and risk factors, and escalating issues when necessary
- Supporting consultation processes and applying this plan consistently
- Actively seeking feedback from team members and addressing concerns early

### 9.3 Senior Leadership

Senior leaders are responsible for:

- Championing a culture of One Team, Zero Tolerance
- Allocating resources to implement and sustain prevention activities
- Monitoring risk data, consultation outcomes, and prevention performance

Reporting significant matters to the Senior Leadership Team and Board

## 10. Governance & Accountability

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Oversight of this plan sits with the Senior Leadership Team, supported by the Board through safety and culture reporting. Governance responsibilities include:

- Ensuring the plan is implemented consistently across all operations
- Monitoring harassment risk data, incident trends, and consultation outcomes
- Receiving regular updates through safety and culture reports
- Allocating resources to support prevention activities and corrective actions
- Holding leaders accountable for prevention outcomes as part of performance expectations

The Senior Leadership Team will ensure that actions arising from reviews are documented and tracked to completion.

## 11. Review & Continuous Improvement

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This plan will be reviewed to ensure it remains effective and aligned with legal requirements, operational realities, and workforce needs. Reviews will occur:

- Following any significant incident or emerging risk
- At the request of senior leadership, safety functions, or workplace auditors

- At least every three years

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Effectiveness will be assessed through:

- Trends in incident reports, complaints, and risk data
- Consultation outcomes with employees, contractors, and Health and Safety Representatives
- Feedback from targeted workforce engagement activities
- Audit findings and industry developments

Prevention activities will be updated to address new or emerging risks. Improvement actions will be reported to senior leadership and, where appropriate, communicated to the workforce. Key learnings and changes will be shared to demonstrate how feedback and incidents are being addressed.

Review outcomes and agreed improvements will be documented in WHS Committee minutes, tracked to completion, and reported through the safety governance framework to the Senior Leadership Team and Board.

For Consultation