

Group Dignity & Respect at Work Policy



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please contact the Diversity Equity & Inclusion team
on DEI@brambles.com

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Summary

The Group Dignity and Respect at Work Policy sets out the organisation's commitment to a respectful workplace, prohibiting bullying, harassment (including sexual harassment), discrimination, victimisation, workplace violence, aggressive or threatening behaviour, and microaggressions.

The Group (refers to all Companies in the Brambles Group) is committed to providing a respectful, safe, and inclusive workplace where all individuals are treated with dignity and respect and can raise concerns without fear of retaliation.

The Group also recognises and upholds a **positive duty, so far as is reasonably practicable**, to eliminate all forms of bullying, harassment, sexual harassment, discrimination, victimisation and workplace violence, especially about:

Key Takeaways

The Group will take reasonable and proportionate steps to prevent inappropriate conduct, including:

- Embedding respectful behaviours and values into our culture.
- Conducting regular risk assessments to identify and address psychosocial hazards.
- Implementing clear policies, procedures, and training to prevent and respond to inappropriate conduct.
- Ensuring leadership accountability and visible commitment to respectful workplace practices.
- Providing accessible reporting mechanisms and support for affected individuals.
- Monitoring and evaluating our practices to ensure continuous improvement.

This duty applies proactively, meaning we must aim to **prevent** unlawful conduct before it occurs, rather than simply responding to complaints or incidents after the fact.

Any policy breach may result in disciplinary action, up to and including termination of employment, in compliance with local laws.

Who does this policy apply to?

This policy covers **all employees** and covers incidents:

- which occur at work and outside of the workplace, such as when representing the business on third party sites, on business trips or at work-related events or social functions and on-line.
- committed by any third party, including customers, suppliers, contractors or visitors to premises. Should any incidents occur with a third party it is vital that it is highlighted so that support and action can be taken accordingly.

What is important to know about this policy?

This policy defines key terms and gives examples of acceptable and unacceptable behaviour, which apply throughout our organisation.

Intent is not a defence. Behaviour can violate this policy regardless of intent. All employees must understand and follow these standards.

Bullying

Bullying is repeated unreasonable behaviour that creates a risk to health and safety, is unwanted, offensive, or intimidating, and is meant to harm, frighten, or upset someone. Bullying may occur in person or through digital communication. Strict definition of bullying is subject to applicable local laws.

Bullying can include aggressive management, threats (physical or psychological), spreading malicious rumours, isolating or excluding individuals, assigning unmanageable workloads, excessive scrutiny, derogatory remarks, unreasonable demands, unwarranted criticism, and persistent overbearing supervision or public insults targeting someone's performance.

Harassment

Harassment is when someone acts in a way, whether by speaking, writing, or physically, that is unwanted and relates to things like age, race, sex, religion, disability, or other personal characteristics. This behaviour can make a person feel uncomfortable, insulted, or unsafe.

Harassment can happen just once if it is serious, or it can be repeated. In many jurisdictions, harassment is defined in law, so it is important to review any local policies.

Harassment includes actions like making derogatory jokes or slurs about protected traits, unwelcome physical contact, mocking disabilities, sharing offensive material, excluding people based on personal attributes, repeated unwanted social invitations, sexual or group coercion, unwelcome advances, threats to out someone's LGBTIQ+ status, and inappropriate comments on appearance related to sex or ethnicity.

Even "banter" intended as playful joking that targets personal attributes can be harassment if it causes offense.

Sexual Harassment

Sexual harassment, a distinct form of harassment, involves unwanted, unwelcome or uninvited sexual behaviour that a reasonable person would anticipate could possibly offend, humiliate, or intimidate. It may be verbal, non-verbal, or physical, including unwanted advances, requests for favours, or other conduct creating a hostile environment. Anyone, regardless of gender, can be affected, and perpetrators may include managers, colleagues, or third parties.

A single serious advance or threat, such as tying benefits to sexual cooperation, is also sexual harassment.

Sexual harassment may include situations where a person is pressured, directly or indirectly, to engage in unwanted sexual behaviour in exchange for workplace benefits or to avoid negative consequences; or conduct of a sexual nature, whether repeated or a single serious incident, creates a workplace environment that is intimidating, hostile or offensive.

Consensual interactions or welcomed compliments are not sexual harassment. For example, coworkers who mutually agree to date or engage personally are not committing harassment, though any Group or individual company policies and conduct codes must be followed.

Conduct that is genuinely welcome and professional is not sexual harassment, however behaviour must stop immediately if it becomes unwelcome.

Discrimination

Discrimination is treating someone unfairly due to traits like age, race, nationality, gender, sexual orientation, religion, disability, marital status, military status, pregnancy, or any other legally protected characteristic. It may be direct, through unequal treatment, or indirect, via policies that disadvantage a group. Employment decisions and daily interactions must be based on merit, not these personal characteristics, as discrimination is prohibited.

Discrimination includes unfair treatment based on protected characteristics, such as not hiring, promoting, or including someone due to gender, race, religion, or sexual orientation. Making decisions based on business needs, qualifications, and performance is not discrimination.

However, requirements that unnecessarily exclude certain groups could be indirect discrimination. We work to ensure decisions are fair, impartial, and based solely on merit and business objectives.

Examples of discrimination include not hiring or promoting someone due to a protected characteristic (e.g. gender, sex, race); excluding colleagues from projects or events because of religion or sexual orientation; assigning harsher criticism or heavier workloads based on ethnic background; or requiring LGBTIQ+ employees to hide their identity when others are not asked to do so.

Assumptions may result in discriminatory practices; for instance, presuming an individual is unsuitable for a role due to the possibility of starting a family (pregnancy), or excluding a colleague from a work event based on perceived religious beliefs. Such conduct constitutes unfair treatment rooted in personal characteristics, which is unlawful in many jurisdictions and deemed inappropriate workplace behaviour at Brambles.

Microaggressions

Microaggressions are subtle, often unintended acts—verbal or non-verbal—that show bias toward marginalised groups. Though not always hostile, these actions can harm a person's dignity or well-being over time. They arise from stereotypes about someone's background and, while less obvious than harassment, could amount to harassment and are unacceptable in our workplace because they conflict with our inclusive culture.

Examples of microaggressions can include: asking a colleague of another ethnicity "Where are you *really* from?", which suggests they do not truly belong; telling a woman in a technical job "Wow, you're good at this for a woman!" (a compliment based on stereotypes); or repeatedly mispronouncing someone's name or not making an effort to learn it after being corrected.

Victimisation, Retaliation & Retribution

Victimisation, retaliation, and retribution involve treating someone unfairly for making or supporting a good-faith complaint under this policy, the Code of Conduct, or discrimination/harassment laws. Brambles prohibits any form of retaliation, meaning no employee can be penalised for raising legitimate concerns. Examples include punishing, ostracising, or otherwise mistreating individuals who report or participate in complaints about bullying, harassment, or discrimination.

Victimisation occurs when someone faces negative consequences for filing a harassment grievance or assisting others with complaints, such as denial of promotion, exclusion, or unfair reviews.

Any retaliation—like threats or demotion—for engaging in the complaint process is prohibited, regardless of timing. ***No complainant or supporter acting in good faith—even if their complaint is unproven—should ever face punishment or negative consequences for making or supporting a complaint.***

Workplace violence

Workplace violence includes physical force, menacing, threats, or aggressive actions that endanger employee or others' safety. ZeroHarm means no tolerance for violence or threats, whether from employees, managers, or third parties in any work setting.

Workplace violence includes physical assault (hitting, pushing, kicking, or restraining), threats to employees or their families, bringing or brandishing weapons, violent outbursts like throwing objects, and any aggression that causes injury or fear.

Serious verbal threats that create fear also qualify. Incidents such as fights or attacks are always extremely serious.

Anger or raised voices alone do not qualify as workplace violence unless accompanied by threats or physical action. Heated arguments without threats or contact, are not considered violence but are considered unprofessional.

Psychological Safety

Psychological safety means employees can raise concerns, share ideas, and report inappropriate behaviour without fear of retaliation.

Fostering psychological safety involves open discussion, valuing input, leaders admitting mistakes, supportive responses to errors, respecting all questions or ideas, and offering multiple ways to speak up. It means employees feel comfortable seeking help or voicing concerns, knowing their perspectives will be respected.

Behaviours that *undermine* psychological safety—such as punishing messengers of bad news, ridiculing questions, or penalising honest mistakes—are not tolerated at work.

Reasonable Management Action

Nothing in this policy is intended to prevent the Group or its managers from taking reasonable management action, carried out in a lawful, fair, and respectful manner. Reasonable management action may include, but is not limited to:

- Allocating work, setting performance objectives, and managing workloads;
- Providing feedback, guidance, or constructive criticism on performance or conduct;
- Addressing performance concerns, including performance improvement processes;
- Implementing disciplinary action or corrective measures where appropriate;
- Making decisions about operational requirements, resourcing, restructuring, or change; and
- Enforcing workplace policies, standards, and codes of conduct.

Reasonable management action does not constitute bullying, harassment, discrimination, or victimisation when it is undertaken in good faith, for legitimate business reasons, and in a reasonable and proportionate way.

Management action that is abusive, excessive, threatening, discriminatory, or otherwise unreasonable in the circumstances may breach this policy.

Raising Concerns (Reporting Procedures)

All employees should report any bullying, harassment, discrimination, or other inappropriate behaviour as soon as possible. Early action can prevent escalation.

Various channels are available for raising concerns, and we support all resolution methods, whether they be direct contact with your manager or your HR partner.

Your local policy explains the process, and HR is available for more information.

The Group provides a multi-lingual **Speak Up** platform which allows concerns to be reported online or via a local toll-free number telephone number and other channels for reporting workplace concerns, details of which are available in local policies or on the intranet [here](#).

All matters will follow a framework for responsible and fair investigations, with access to support services such as the Employee Assistance Programmes (EAPs) and potential temporary work adjustments if and where required.

If you believe a crime such as physical or sexual assault has occurred, you may contact the police.

Confidentiality

Concerns raised under this policy will be handled with confidentiality and sensitivity. We take all complaints seriously and aim to keep information private, except where legal Group or individual company obligations require disclosure.

Details will only be shared with those directly involved—investigators, relevant managers, HR, legal advisors, and the person accused so they can respond. In certain cases, it may be necessary for Senior Executives or Directors to be informed, in line with appropriate local legislation.

Everyone involved, including witnesses, must keep information confidential and act discreetly to protect privacy and ensure a fair process. Breaking confidentiality may result in disciplinary action, up to and including dismissal, in line with local laws and policies.

Making malicious or false allegations

Malicious or knowingly false accusations are not covered by this policy and may result in action in accordance with local policies or legislation. Honest complaints, even if unsubstantiated, will not be penalised. We encourage reporting any concerning behaviour, prioritising trust and open communication over fear. It is far more important that people speak up without fear.

What to do if you face a complaint

Formal complaints will be investigated following appropriate policy, whether local or the Speak Up policy, with fair opportunities to respond and appropriate support for all parties involved. As an individual or manager, you should respond openly and thoughtfully to concerns, whether informal or formal. You should take all issues seriously—do not dismiss them or label anyone as oversensitive. Your local HR team are available to support you throughout, or alternatively please follow any appropriate guidelines.

How this works across locations?

This Group Dignity and Respect at Work policy sets minimum standards for conduct across all locations, though local laws and practices may complement or override it where necessary.

Many countries protect workplace dignity through legislation. This policy supports those standards and aims to further promote inclusivity. Where conflicts arise between this policy and local law, local law will take precedence.

Local policies or guidelines—such as bullying and harassment protocols, health and safety rules, and complaint procedures—may supplement this group policy.

Employees should review relevant handbooks and regional or country-specific policies, including the Brambles Code of Conduct and Diversity, Equity and Inclusion Policy.

Implementation varies by region, with requirements such as investigation steps or reporting timeframes subject to local law. Managers and HR must ensure that local processes align with this policy.

Responsibilities by Role

To make our Dignity and Respect at Work a reality, each of us has a role to play every day:

Employee category	Responsibility
Brambles Board will:	● approve policy ● lead by example
Executive Leadership Team (ELT) will:	● champion Dignity and Respect at Work through leadership accountability ● lead by example and role model behaviours required ● support steps to provide a dignified and respectful environment in line with the policy.
People leaders will:	● lead by example and role model behaviours required ● Create and maintain appropriate behaviours within their teams, encourage a culture of speaking up, address inappropriate conduct, and support employees so far as is reasonably practicable ● work alongside Human Resources team to ensure the expectations of this policy are maintained ● provide the appropriate support, tools and, where required, adjustments for employees to fulfil their roles effectively

Employee category	Responsibility
HR leadership team will:	• implement this policy and review it annually • support the provision of regular training, including where necessary mentoring and coaching the Executive Leadership Team • ensure compliance and alignment with the policy
Every employee will:	• contribute to a culture of dignity and respect • speak up and not be a passive bystander to any inappropriate behaviour that contradicts this policy • be accountable for their own behaviour, take responsibility for personal development, where this is reasonably practicable
Suppliers and customers will:	• align with our Code of Conduct and principles of zero harm • take all reasonable steps to comply with local legislation around unlawful behaviours and the treatment of protected characteristics

Rules you should know

Brambles does not tolerate breaches of the Group Dignity and Respect at Work Policy and expects all employees to act with dignity and respect. Under this policy, such conduct is considered misconduct and may lead to disciplinary action, including dismissal for gross misconduct, as permitted by local legislation.

The policy will be:

- reviewed annually; and
- modified and amended at the Group's discretion. Employees must follow this policy, but it is not a contract and may be changed by the Group at any time to align with current laws.

Other references you should know about

Related policies can be found by searching the below names on Workday Search / Assistant:

- Corporate Social Responsibility policy
- Brambles Code of Conduct
- Group Diversity, Equity & Inclusion Policy
- Global Employee Privacy Policy
- Technology Services Acceptable Use Policy
- Speak Up Policy