



Code of Conduct

Title:	Code of Conduct
Approved by:	QCN Fibre Board
Responsible lead:	Chief Executive
Audience:	All QCN Fibre
Brief description:	Sets out the standards of behaviour required of QCN Fibre Staff.
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1 Introduction

This Code of Conduct brings to life our culture and commitment to our customers. It sets out the standard of behaviour which is expected at QCN Fibre, to enable QCN Fibre Staff to contribute to the delivery of QCN Fibre’s objectives.

The guiding principles and requirements of the Code of Conduct need to be applied to each employee’s daily tasks and duties at QCN Fibre. Where an employee has any questions or concerns about understanding or applying this Code of Conduct, they should speak with the Chief Executive.

Likewise, if an employee is aware of something that might be a breach of the Code of Conduct, it should be raised with the Chief Executive so it can be addressed.

1.1 Scope

This Code applies to every person working for QCN Fibre. For the purposes of this document only, QCN Fibre Staff as:

- Any QCN Fibre employee whether permanent, temporary, full-time, part-time or casual
- Any volunteer, contractor, consultant, labour hire worker, or anyone who works in any other capacity for QCN Fibre.

This Code of Conduct applies in the workplace, at places where there is a connection with work, or where the employee’s behaviour impacts, or has the potential to impact QCN Fibre, including (without limitation) when:

- At work/on duty for QCN Fibre
- Attending and representing QCN Fibre at a work-related event or function or can be identified as working at QCN Fibre. This includes but is not limited to conferences, award events, media briefings, meetings.
- Wearing photo IDs or identification cards that show the QCN Fibre brand
- On QCN Fibre premises under the control of QCN Fibre.

2 Roles and Responsibilities

Chief Executive	<ul style="list-style-type: none"> ▪ Responsible for ensuring that the Code of Conduct is maintained and reviewed regularly to ensure currency. ▪ Responsible for developing the training material and providing input to training delivery on the Code of Conduct ▪ Responsible for ensuring that all staff understand and comply with the requirements of the Code of Conduct
Managers	<ul style="list-style-type: none"> ▪ Responsible for modelling and promoting the Code of Conduct. They have the ability to influence others by fostering an ethical environment and demonstrate this awareness in performing their duties, and in making decisions.
QCN Fibre Staff	<ul style="list-style-type: none"> ▪ Have an obligation to comply with the requirements of this Code of Conduct. Take personal responsibility to uphold this Code of Conduct in the performance of their duties ▪ Participate in training on their Code of Conduct obligations

2.1 Monitoring and Compliance

All QCN Fibre Staff will be required to undertake Code of Conduct awareness training at least every two years. The Chief Executive is responsible for ensuring that all QCN Fibre Staff understand and meet Code of Conduct requirements.

2.2 Risk Management

The Code of Conduct enables staff to perform their duties in a safe and productive environment where diversity is valued.

The Code of Conduct operates in conjunction with QCN Fibre's policies and procedures to ensure that risks associated with inappropriate behaviour are identified early and managed effectively.

3 Maintaining a Safe and Productive Work Environment

QCN Fibre is committed to providing a work environment where people are treated fairly, respectfully, and with dignity, free from harassment and bullying and any other inappropriate conduct

3.1 Workplace Bullying

Workplace bullying is repeated and unreasonable behaviour directed towards a staff member, or a group of QCN Fibre Staff, that creates a risk to health and safety.

Unreasonable behaviour includes behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

Workplace bullying can include behaviours such as practical jokes, belittling and humiliating comments, sabotaging a person's work, unjustified criticism, setting unreasonable deadlines, denying access to information, hiding documents or equipment, deliberately excluding someone from work-related activities, spreading malicious rumours, abusive and offensive language.

Workplace bullying can have significant and adverse impact on people and QCN Fibre.

Staff must not engage in actions or behaviours that involve Workplace Bullying. It is important that staff consider the implications of their behaviours.

Anyone experiencing or witnessing such behaviour should discuss this with the Chief Executive.

Note: Workplace bullying should not be confused with reasonable management action taken in a reasonable way such as constructive feedback, performance management, or individual or group development.

3.2 Sexual Harassment

Sexual harassment is any unwelcome conduct of a sexual nature which is done either to offend, humiliate or intimidate another person, or where it is reasonable to expect the person might feel that way. It includes uninvited physical intimacy such as touching in a sexual way, uninvited sexual propositions, and remarks with sexual connotations. Sexual harassment does not have to be deliberate, or repeated to be unlawful.

Staff must not engage in actions or behaviours that involve sexual harassment. It is important that staff consider the implications of their behaviours.

Anyone experiencing or witnessing such behaviour should discuss this with the Chief Executive.

3.3 Unlawful Discrimination

QCN Fibre is committed to developing and maintaining a diverse and inclusive workplace where staff treat others fairly and with respect. Unlawful discrimination within the workplace will not be tolerated.

Discrimination occurs when a person is treated less favourably (either directly or indirectly) because of a certain attribute, or due to an association with a person identified as having a certain attribute.

Grounds for discrimination include gender, relationship status, pregnancy, parental status, breastfeeding, age, race, impairment, religious belief or religious activity, political belief or political

activity, trade union activity, lawful sexual activity, gender identity, sexuality, family responsibilities or association with a person identified as having one of these attributes.

Anyone experiencing or witnessing such behaviour should discuss this with the Chief Executive.

QCN Fibre Staff will:

- Treat others with respect and dignity
- Encourage and insist on a workplace free of harassment and bullying
- Demonstrate fairness and respect for diversity
- Ensure employment-related decisions, including recruitment, promotion, training and development, compensation and termination of employment are based on merit and business considerations

QCN Fibre Staff will not:

- Behave in a way that is offensive, insulting, intimidating, malicious or humiliating
- Engage in sexual harassment
- Make decisions based on attributes unrelated to job capabilities or performance
- Make jokes or comments about a person's race, gender, ethnicity, religion, sexual preference, age, physical appearance or disability etc.

4 Work Health and Safety

Every individual is responsible and accountable for health and safety management, and QCN Fibre Staff are required to be active role models of this commitment.

4.1 Safety

Safety is essential for all QCN Fibre Staff. QCN Fibre will continue working towards improving its safety procedures and safety culture.

Ensuring a safe work environment means all staff demonstrate safe behaviours at all times, ensuring the Chief Executive openly reports, discusses and resolves incidents and events in a timely manner, and proactively managing health and safety risks.

QCN Fibre Staff will:

- Demonstrate safe behaviours at all times
- Care for their wellbeing, and the wellbeing of others
- Proactively manage health and safety risks
- Comply with QCN Fibre's work health and safety policies and procedures and assist others to do the same
- Identify, assess and take steps to control and escalate health and safety hazards
- Report any accident, injury, illness or incident to the Chief Executive so that appropriate action can be taken
- Know what to do in the case of an emergency and ensure that visitors are familiar with QCN Fibre's emergency procedures.

QCN Fibre Staff will not:

- Assume that someone else will report a risk or concern, and that as a result it does not need to be raised

4.2 Fitness for Work

All QCN Fibre Staff are required to be physically and mentally capable of performing their role, without undue risk of harm to themselves or others, and not adversely affected by drugs, alcohol or fatigue.

QCN Fibre is an alcohol free workplace. A blood alcohol level of 0% must be maintained by QCN Fibre Staff while at work, including lunch breaks, business meetings and where otherwise representing the company.

Staff will advise the Chief Executive of any condition, medical condition and/or medication that may affect their ability to undertake their work in a safe and effective manner.

QCN Fibre Staff will:

- Come to work fit and ready to perform work
- Have a discussion with the Chief Executive if taking prescribed medication that could affect their work performance

QCN Fibre Staff will not:

- Undertake work (including driving to and from work, or attending work functions) while impaired by alcohol or drugs (illegal, legal or prescribed)
- Smoke on QCN Fibre premises

5 Representing QCN Fibre

When representing QCN Fibre, employees should behave courteously and professionally. A staff member's conduct reflects on QCN Fibre and should promote QCN Fibre as an organisation of highly-skilled professionals.

QCN Fibre Staff will maintain a tidy and professional appearance while on duty.

5.1 Social Media and Public Discussion

Only QCN Fibre Staff members authorised by the Board pursuant to the Authorisation Policy are permitted to post on social media on behalf of QCN Fibre for approved business use. QCN Fibre Staff members are required to use the same level of care and professionalism as with other written communications.

Appropriate use of social media is a requirement where the employee's use of social media is connected to QCN Fibre, even when it is out of work hours, on private and restricted networks, and on personal technologies and equipment.

QCN Fibre Staff will:

- Refrain from communications that may damage or be reasonably perceived as detrimental to QCN Fibre's reputation or that of its customers.
- Refrain from communications that are potentially offensive, obscene, defamatory, abusive, derogatory or otherwise unlawful, inappropriate or unprofessional.
- Refrain from addressing any media enquiries through social media communications.
- Report media and public comment enquiries promptly to the communications leader, and not respond unless specifically authorised by the Chief Executive
- Take all reasonable steps to ensure that any comments which are made as a private citizen are clearly understood to be personal viewpoints, or those of a separate organisation

QCN Fibre Staff will not:

- Use any QCN Fibre trademarks, brand or the identity or images of colleagues and other individuals in external communications, including social media (and hashtags), unless specifically authorised to do so

- Act as spokesperson for QCN Fibre or imply that they represent QCN Fibre unless specifically authorised.
- Discuss or disclose any confidential information, other non-public proprietary QCN Fibre information, personal information that is obtained in their capacity as a QCN Fibre Staff member, or any confidential information regarding or obtained from QCN Fibre's customers, potential customers or vendors.

6 Conflicts of Interest

6.1 Identifying and Managing of Conflicts of Interest

QCN Fibre Staff are required to avoid any activity which would conflict with their responsibilities to QCN Fibre, or compromise the quality of their work performance, their commitment to their work, or their ability to make appropriate decisions.

Conflicts of interest create the risk that professional integrity may be questioned. Thus, personal views and interests must be put aside to ensure customer trust in QCN Fibre to act professionally and in accordance with policies and procedures.

Conflicts of interest can be actual, perceived, or potential.

- An actual conflict of interest involves a current issue that results in a direct conflict between your QCN Fibre responsibilities and a competing interest or obligation.
- A perceived conflict of interest involves a current issue where it could reasonably be perceived that a competing interest could give rise to a conflict between your QCN Fibre responsibilities and a competing interest or obligation.
- A potential conflict of interest arises where an existing interest or obligation could give rise to a future conflict between QCN Fibre responsibilities and a competing interest or obligation.
- Where an individual recognises there may be a conflict of interest they must advise the Chief Executive and notify QCN Fibre by completing a Conflict of Interest Declaration Form and submitting it for review.

While having a conflict of interest is not a breach of the Code of Conduct, failure to declare and manage a conflict of interest may be a breach.

QCN Fibre Staff will:

- Conduct all business relationships in a professional manner
- Avoid business dealings and personal relationships that cause or may cause conflicts of interest, or create the appearance of a conflict
- Excuse themselves from any decision making process where they have an interest that influences, or is perceived as influencing their ability to make an objective and appropriate decision.

QCN Fibre Staff will not:

- Hold positions or investments in organisations that have business dealings with QCN Fibre if the staff member is in a position to influence transactions, or if the relationship itself creates an actual, potential or perceived conflict of interest
- Misuse a staff member position to promote or assist an external activity or party
- Personally undertake any opportunities in which QCN Fibre could have an interest, and that are identified through the use of QCN Fibre information

6.2 Engaging in Secondary/Outside Employment

Prior to engaging in secondary /outside employment, or private business interests outside of QCN Fibre, staff must notify the Chief Executive, and ensure that the activity will not:

- Conflict or interfere with the employees QCN Fibre duties

- Adversely affect the employees work performance
- Involve information or resources obtained or available through work with QCN Fibre
- Discredit or disadvantage QCN Fibre
- Provide unfair advantage or benefit to the employee, or another party
- Occur during QCN Fibre working hours.
- If there is a possibility that any of the above could apply, or there could be a perceived conflict of interest the employee must:
 - Talk with the Chief Executive
 - Have record of how any conflict, or impact, will be managed
 - Declare the conflict of interest by completing a Conflict of Interest Declaration Form and submitting it for review.
- QCN Fibre resources such as telephones, photocopiers and computers, must not be used for the purposes of secondary employment or private business interests. The use of QCN Fibre resources for personal commercial gain or profit is not permitted at any time.

7 Confidentiality and Use of QCN Fibre Information

7.1 Employee Obligations

When performing work on behalf of QCN Fibre, employees have an obligation to protect QCN Fibre’s confidential information and to use it for its intended purpose. ‘Information’ refers to all internal and external data, held in either physical or electronic formats. During the course of their duties QCN Fibre Staff may acquire information about QCN Fibre, its customers, suppliers, contractors or other third parties that is confidential, competitively sensitive and/or proprietary. Staff should assume that company information is confidential or competitively sensitive and not for external distribution unless they have a clear indication that QCN Fibre has publicly released the information.

Information must not be used for personal benefit, or for the benefit of anyone outside QCN Fibre, and should only be accessed and used if necessary in the performance of QCN Fibre duties.

Where employees are not sure what information they can share, they should speak with the Chief Executive for further guidance.

QCN Fibre Staff will:

- Maintain the confidentiality of QCN Fibre’s information
- Report any leaks of QCN Fibre information to the Chief Executive
- Seek advice if considering dealing in securities associated with QCN Fibre’s operations
- Carefully consider the information disclosed to those external to QCN Fibre

QCN Fibre Staff will not:

- Disclose inside information to anyone outside QCN Fibre (with the exception of any disclosures made in accordance with any whistle-blower or public interest disclosure frameworks), including family and friends, unless it is appropriately authorised, documented and is necessary. This does not include disclosures made to a worker’s union or legal advisors for the purposes of seeking support or advice on a personal matter related to their own employment or on behalf of a union member. In such cases information should be shared in confidence.
- Store or transmit confidential information outside of QCN Fibre’s network/system without approval
- Recommend or suggest that anyone else buy, sell or deal in the securities of any company, while having inside information about the company
- Trade in the shares of companies when the employee has access to inside information that, if made public, could reasonably be expected to affect that company’s share price

8 Privacy

QCN Fibre has a Privacy Policy that sets out how QCN Fibre meets the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Information Privacy Act 2009* (Qld) (**IP Act**).

The National Privacy Principles (NPPs), as contained in the Privacy Act, establish a personal information protection regime. For the purposes of the NPPs, 'personal information' is regarded as information or opinion about an identified individual, or an individual who can be readily identified from such information. Examples include name, address, date of birth, telephone number, Tax File Number and bank account details.

As an entity subject to the NPPs, QCN Fibre remains committed to only collecting, using, disclosing and retaining personal information that is necessary to meet business requirements, in accordance with the Australian Privacy Principles (APPs) and the Privacy Act. The key obligations for QCN Fibre Staff in this context include the following:

- **Collection:** QCN Fibre Staff are to collect personal information by authorised means and for a purpose relevant to QCN Fibre's functions and operations.
- **Use:** Personal information must only be used for the purpose for which it was obtained unless special circumstances apply.
- **Disclosure:** Personal information must generally not be disclosed to external parties unless, for example;
 - Release of the personal information is required by law; or
 - The personal information is publicly available; or
 - QCN Fibre is authorised to do so in writing by the individual whose information is to be released.
- **Storage and retention:** Personal information must be stored securely and retained only for the relevant authorised period

When performing work on behalf of QCN Fibre, staff must adhere to the requirements relating to the collection, storage, use and disclosure of personal information as contained within the Privacy Policy. QCN Fibre respects employee personal information and privacy, and expects employees to respect the personal information and privacy of others.

QCN Fibre is also subject to Chapter 3 of the IP Act which establishes a personal information access and amendment regime. Under this regime, persons can apply to access their personal information held by QCN Fibre and also make an application to have their personal information, as held by QCN Fibre, amended. For the purposes of the IP Act, personal information is also defined as information which has the capacity to identify a person.

Where QCN Fibre Staff receives a formal application under the IP Act to access or amend personal information, QCN Fibre Staff are to immediately refer the application to the Chief Executive. Formal applications made under the IP Act are applications made in writing using a specific application form approved under the IP Act. A request to update an address made by a member of the public by a telephone call to QCN Fibre would be an administrative request and would not constitute a formal application to amend personal information under the IP Act.

For further information or if a staff member is aware of any actual or suspected violations or risks to personal information it must be reported as soon as possible to the Chief Executive.

QCN Fibre Staff will:

- Comply with all legal requirements that apply to the collection, use, disclosure and retention of personal information
- Only collect, use, disclose and retain personal information that is necessary for legitimate activities and functions
- Use personal information in a way that is consistent and compatible with the purpose for which it was collected, unless otherwise approved by the relevant individual

- Utilise safeguards to help protect personal information against risks such as loss or destruction or unauthorised access, or the use, modification or disclosure of personal information
- Maintain the accuracy of personal information.

QCN Fibre Staff will not:

- Access personal information unless they have appropriate approval and a clear business need to do so
- Provide personal information to anyone inside or outside of QCN Fibre without proper approval.

9 Gifts and Entertainment

9.1 Entertainment and Hospitality

On occasions it will be appropriate for QCN Fibre to offer entertainment and hospitality to customers, workers and key stakeholders. As a GOC subsidiary, QCN Fibre and its workers need to be transparent and accountable for such expenditure.

Corporate entertainment and hospitality occurs when meals and/or entertainment is provided that is more than light meals/refreshments associated with a QCN Fibre business related activity.

Approval for expenditure on corporate entertainment and hospitality will in most instances need to be obtained in advance. Guidance on activities which constitute entertainment can be found in QCN Fibre's Corporate Entertainment and Hospitality Policy, along with details on limits and approval requirements.

Wherever expenditure on corporate entertainment and hospitality occurs, supporting documentation must be obtained and retained for tax and reporting purposes.

9.2 Receiving and Giving of Gifts and Donations

Accepting gifts from contractors and suppliers may be a legitimate way of building good business relationships, however as a GOC subsidiary, QCN Fibre does not encourage the receiving of gifts, as this could lead to the creation of a conflict of interest. Employees must never accept a gift or benefit if it is possible that this may influence their decision making, the way in which their job is performed, or cause others to perceive that there has been improper influence.

Token gifts, such as chocolates, a bottle of wine, diaries and souvenirs are generally acceptable provided they are not accepted from the same source on a regular basis.

If offered a gift with a value greater than \$100, staff must report the gift to the Chief Executive to see if the gift can be accepted. 'Reportable gifts' include all valuable items or property, as well as travel, entertainment, hospitality, or any other benefit inconsistent with industry norms or which could be considered inappropriate.

The Chief Executive must be informed immediately if a substantial gift or benefit is offered in an attempt to influence the employee's decision making.

When giving gifts or donations, prior approval from the Chief Executive will be required for any donation of services, materials, or money (other than approved QCN Fibre gifts) to external persons, institutions, organisations or charities where the value of the gift or benefit exceeds \$100 (or as amended from time to time).

QCN Fibre Staff will:

- Report and record any gift offered and accepted with a value greater than \$100

- Clearly articulate QCN Fibre's requirements on accepting gifts at the beginning of new business relationships, especially where cultural norms may be different from those outlined in the code
- Assess the potential for a conflict of interest when accepting gifts
- Be prepared to decline politely any offer not in line with QCN Fibre's standards
- Regard gifts received through an intermediary as being the same as those given directly

QCN Fibre Staff will not:

- Request a gift of any kind from a supplier, customer or other party. This includes both direct requests and giving the impression that the offer of a gift or hospitality would be appropriate or desirable.
- Retain a gift over \$100 without obtaining approval
- Receive gifts or favours in return for business services, or information, or a business advantage
- Accept gifts, not designed to further a valid business purpose or relationship.

10 Use of Company Resources

QCN Fibre's resources exist in various forms and include physical and non-physical resources such as facilities, equipment, information, data, and an employee's time at work. Each employee has an obligation to protect QCN Fibre's resources and to use them honestly, economically, efficiently and for their intended purpose.

The use of QCN Fibre equipment, materials or other resources for private reasons is generally not permitted unless prior approval is obtained from the Chief Executive. Within reason, a limited amount of personal use of telephones, photocopiers and computers is acceptable, provided this does not interfere with an individual's work, and is not connected with a second job, or any private business interests i.e. anything where a profit may be made via the use of QCN Fibre resources.

QCN Fibre resources are not to be used for any offensive, obscene, illegal or otherwise inappropriate purposes (e.g. online/internet gambling), and QCN Fibre will not be responsible for any such acts committed using QCN Fibre assets.

QCN Fibre Staff will:

- Use QCN Fibre resources for their intended purpose
- Protect QCN Fibre's resources from waste, damage, misuse, loss, fraud or theft
- Prevent non-authorized personnel from accessing QCN Fibre facilities, information, data or other assets where possible, and report immediately any use of resources where there is a suspected breach.

QCN Fibre will not:

- Use QCN Fibre resources for personal gain
- Enter into any fraudulent or illegal transactions involving QCN Fibre's resources
- Permit unauthorised entry to a QCN Fibre site or office, or access to QCN Fibre's information technology
- Deliberately access, store, send, post or publish inappropriate material, or ignore others doing so
- Use QCN Fibre resources for secondary employment or private business interest

11 Complaints Management

Workers are encouraged to discuss any concerns that they have regarding behaviour which may be in breach of the requirements of the Code of Conduct with the Chief Executive.

12 Consequences of a Breach

QCN Fibre is committed to the standards and principles outlined in this Code of Conduct. The Code of Conduct is designed to attract the highest level of confidence from colleagues, shareholders, customers and suppliers. It is also there to protect QCN Fibre Staff by providing guidelines on expected standards of behaviour.

Any breach of the Code will be managed in accordance with the Performance Counselling and Discipline Procedure outlined in the Employment Handbook.

13 Definitions

The following definitions apply to this policy and any related policy documents.

Term	Definition
Conflict of Interest	<p>Where a worker has competing interest or loyalties and these competing interest could interfere with the proper and impartial performance of the employee's duties at QCN Fibre, or could have the appearance of affecting the worker's judgement, objectivity or independence.</p> <p>Conflicts of interest can be actual, perceived or potential</p> <ul style="list-style-type: none"> ▪ An actual conflict of interest involves a current issue that results in direct conflict between the employee's QCN Fibre responsibilities and a competing interest or obligation ▪ A perceived conflict of interest involves a current issue where it could reasonable be perceived that a competing interest could give rise to a conflict between the employee's QCN Fibre responsibilities and a competing interest or obligation. ▪ A potential conflict of interest arises where an existing interest or obligation could give rise to a future conflict between the employee's responsibilities and a competing interest or obligations
QCN Fibre Staff	<p>The Directors of QCN Fibre and any QCN Fibre employee whether permanent, temporary, full-time, part-time or casual, or any volunteer, student, contractor, consultant, labour hire worker, or anyone who works in any other capacity for QCN Fibre.</p>
Sexual Harassment	<p>Sexual harassment is any unwelcome conduct of a sexual nature which is done either to offend, humiliate or intimidate another person, or where it is reasonable to expect the person might feel that way.</p>
Social Media	<p>The range of web-based communication tools that enable people to interact and share information and ideas online.</p>
Unlawful Discrimination	<p>Unlawful discrimination can be direct or indirect.</p> <p>Direct discrimination occurs when a person is treated less favourably because of a certain attribute, or due to an association with a person identified as having a certain attribute.</p> <p>Indirect discrimination is when a person/s imposes, or proposes to impose a term:</p> <ul style="list-style-type: none"> ▪ Which a person with an attribute does not or is notable to comply; and ▪ A higher proportion of people without the attribute comply or are able to comply; and ▪ Is not reasonable. <p>Grounds for discrimination include gender, relationship status, pregnancy, parental status, breastfeeding, age, race, impairment, religious belief or</p>

	religious activity, political belief or political activity, trade union activity, lawful sexual activity, gender identity, sexuality, family responsibilities or association with a person identified as having one of these attributes.
Workplace Bullying	Repeated and unreasonable behaviour directed towards a worker, or a group of workers that creates a risk to health and safety. Unreasonable behaviour includes behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.
