

Discrimination & Sexual Harassment POLICY

Respect @ Work Discrimination and Sexual Harassment

PeopleIN Limited (ACN 615 173 076)

adopted on 28 Jan 2025

Discrimination & Sexual Harassment POLICY

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1 SCOPE

This policy applies to everyone who works for, acts for, or in some way, represents PeopleIN Limited together with its controlled subsidiaries (**PeopleIN**), anywhere in the world including:

- full time, part time, casual, permanent or temporary;
- contract or commission workers; and
- volunteers, vocational and work experience placements. (together **Staff**)

It applies to Staff:

- At the workplace;
- Performing work duties;
- Attending work events;
- Fulfilling work-related obligations;
- At a client/stakeholder premises; and
- Out of hours when the relevant conduct has a relevant connection to the employment relationship such as where the conduct is likely to cause serious damage to the relationship between the employee and other PeopleIN employees or the employee and PeopleIN, the conduct damages PeopleIN's interests or the conduct is incompatible with the employee's duty as an employee.

Further responsibilities also apply to organisational leaders including:

- Board members;
- Divisional leaders; and
- Greater leadership team members. (**Organisational Leaders**)

2 OBJECTIVE

The objectives of this policy are to promote a diverse, inclusive and respectful workplace environment whilst ensuring a workplace free of sexual, including sex-based, harassment, and unlawful discrimination. At any PeopleIN workplace, unlawful discrimination and sexual harassment are not tolerated. All Staff are directed not to engage in sexual harassment or unlawful discrimination. Staff that engage in such behaviours will be subject to disciplinary action up to and including termination of their engagement or employment. This policy aims to assist Staff in understanding what unlawful discrimination and sexual harassment is and how we are all responsible for ensuring a workplace culture of respect and inclusiveness.

3 BUSINESS PRINCIPLES

At PeopleIN we have built a culture of respect and inclusiveness by embracing and supporting people of all backgrounds. The PeopleIN group of companies have Corporate Values which guide how we build our culture and celebrate our achievements. They are:

- **We are HUMAN**
- **We are MEMORABLE**
- **We are BOLD**
- **We achieve the EXTRAORDINARY**

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At PeopleIN we know that our Staff are our most valuable asset. We recognise that we are the sum of our individual differences, life experiences, knowledge, innovation, creativeness, personal capabilities, and the talents that our Staff bring to our organisation. Our people represent our culture, our reputation and PeopleIN's achievements.

At PeopleIN we embrace and encourage our Staffs' differences in age, disability, ethnicity, family or marital status, gender identity or expression, language, origin, physical and mental abilities, race, religion or sexual orientation and other characteristics that make our Staff the unique humans they are.

Every person engaged by PeopleIN is responsible for contributing to the success of our Respect@Work Policy framework.

Upon induction to PeopleIN all Staff shall be provided with a copy of this policy. All Staff will read and confirm their understanding of the document and confirm their intention to adhere to the standards provided for in this document. PeopleIN will conduct annual refresher training in relation to its expectations to prevent unlawful discrimination and sexual harassment.

4 THE PEOPLEIN RESPECT @ WORK PRINCIPLES – THE MUST DO'S OF PEOPLEIN

We build and maintain a respectful workplace by behaving in accordance with these principles:

- (a) We treat each other with respect and consideration.
- (b) We are inclusive, valuing others and embracing our differences.
- (c) We recognise the efforts and achievements of others.
- (d) We consider the impact of our behaviours on others.
- (e) We apply these principles throughout the lifecycle of PeopleIN employment, from recruitment to retirement.
- (f) We call out inappropriate treatment or behaviours and recognise our personal and collective responsibilities to maintaining a respectful workplace.

Responsibilities:

- (a) All Staff are expected to uphold the above principles in their interactions with others in the workplace and in their dealing with clients and other third parties.
- (b) Organisational leaders have a responsibility to promote a work environment that prevents unlawful discrimination and sexual harassment. This includes a responsibility to:
 - a. Ensure PeopleIN's Respect@Work framework remains fit for purpose to prevent the occurrence of unlawful discrimination and sexual harassment in the workplace.
 - b. Ensure that Staff are provided with appropriate training and guidance concerning anti-discrimination, sexual harassment awareness and PeopleIN's Respect@Work framework.

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- c. Ensure that Staff have access to the appropriate levels of support and counselling when raising issues in accordance with the Respect@Work framework.
- (c) Staff in supervisory or managerial roles have a responsibility to ensure that their team environments are respectful and inclusive. These Staff have a responsibility to ensure that their team environments are free from unlawful discrimination and sexual harassment. This includes a responsibility to:
 - a. Monitor their team environments to ensure that the above principles are complied with.
 - b. Role model behaviours consistent with the above principles.
 - c. Ensure all Staff under their supervision have completed their anti-discrimination and sexual harassment awareness training.
 - d. Respond to any identified discrimination or sexual harassment issues in accordance with the Respect@Work policy and procedure framework.
- (d) All Staff have a responsibility to report, or resolve informally, any issues pertaining to unlawful discrimination or sexual harassment.

5 UNACCEPTABLE BEHAVIOURS – THE MUST NEVER DO’S OF PEOPLEIN

At PeopleIN the following behaviours are strictly prohibited and are never acceptable:

- (a) Any form of unlawful discrimination that results in a person being treated less favourably than another person because of their background or personal attributes (actual or perceived).

Note: *Discrimination does not include actions that are taken to ensure an employee can perform the inherent requirements of their role, being unable to implement an unreasonable adjustment or actions taken as the result of reasonable management action.*

- (b) Any form of workplace sexual harassment.
- (c) Any form of communication which promotes an opinion or action that is prejudiced, bigoted or discriminatory.
- (d) Taking an adverse action for any reason relating to a staff member’s protected attribute such as race, gender or gender identity, sexual orientation, age, physical or mental disability, marital status, family or carer’s responsibilities, pregnancy, religion, political opinion, nationality, or origin.

Note: *Staff must be aware that any form of unlawful discrimination or sexual harassment is **strictly prohibited**. Unlawful discrimination and sexual harassment will amount to misconduct. Any staff member found to have engaged in such behaviour in, or in connection with, the workplace will be subject to disciplinary action up to and including termination of employment.*

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6 RESOLVING A GRIEVANCE OR RAISING A COMPLAINT

If you or a colleague are experiencing or witnessing inappropriate behaviours, unlawful discrimination or sexual harassment you may raise those issues and have them addressed pursuant to the PeopleIN Grievance and Complaint Managing Procedure.

Any grievance or complaint raised pursuant to this policy shall be managed in accordance with the PeopleIN Grievance and Complaint Management Procedure.

This will involve a process of:

- Attempted informal resolution of the issue between staff members. If this is not effective or appropriate in the circumstances the matter will escalate to the next step.
- Formal resolution through escalation to supervisor or HR.
- The resolution of the matter will be addressed promptly and in a manner that is sensitive and prioritises: safety at work, the preferences of the complainant in how the matter is addressed (where appropriate) and fairness to all of the parties involved in the matter.
- The matter will be resolved to ensure a safe workplace free from sexual harassment and unlawful discrimination.

Alternatively, where appropriate, such a matter may be addressed as a whistleblower disclosure or otherwise as a confidential disclosure under the PeopleIN Whistleblower Policy. This ensures there is a confidential option for disclosure of unacceptable behaviours.

7 RELATED POLICES AND GUIDANCE:

PeopleIN Code of Conduct

PeopleIN Diversity and Inclusion Statement

PeopleIN Grievance and Complaints Managing Procedure

PeopleIN Respect@Work Bullying and Harassment Policy

PeopleIN Whistleblower Policy

8 RELEVANT LEGISLATION

- Australian Capital Territory – *Discrimination Act 1991*
- New South Wales – *Anti-Discrimination Act 1977*
- Northern Territory – *Anti-Discrimination Act 1996*
- Queensland – *Anti-Discrimination Act 1991*
- South Australia – *Equal Opportunity Act 1984*
- Tasmania – *Anti-Discrimination Act 1998*
- Victoria – *Equal Opportunity Act 2010*
- Western Australia – *Equal Opportunity Act 1984*
- *Age Discrimination Act 2004*

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- *Australian Human Rights Commission Act 1986*
- *Disability Discrimination Act 1992*
- *Racial Discrimination Act 1975*
- *Sex Discrimination Act 1984*
- *Fair Work Act 2009*

9 ADDITIONAL RESOURCES:

PeopleIN Employee Assistance Program

Lifeline Australia: <https://www.lifeline.org.au/>

Beyond Blue: <https://www.beyondblue.org.au/>

Our Watch : <https://workplace.ourwatch.org.au/>

White Ribbon: <https://www.whiteribbon.org.au/Find-Help/Help-Lines>

It Stops with Me: <https://itstopswithme.humanrights.gov.au/>

Multi-Cultural Australia: https://www.multiculturalaustralia.org.au/anti_racism_resources

Human Rights Council of Australia: <https://www.hrca.org.au/>

10 POLICY REVIEW

This policy will be reviewed at least annually (or more frequently if necessary due to technical or other business policy requirements). The Group reserves the right to suspend, modify, or withdraw this Policy at any time. All Staff are responsible for regularly reviewing its terms.