Workplace Conduct and Anti-Discrimination Policy

(Including Employee Assistance Program – WHS Addendum)

1. Purpose

Riverina Traffic Services Pty Ltd (RTS) is committed to providing a safe, respectful, inclusive and lawful workplace. This policy sets out RTS's expectations regarding workplace conduct and behaviour and integrates:

- Bullying and Harassment
- Sexual Harassment (Positive Duty compliance)
- Equal Opportunity and Anti-Discrimination
- Grievance Resolution
- Wilful and False Representation by Employees
- Employee Assistance Program (EAP) as a Work Health and Safety (WHS) support mechanism

This policy supports RTS's obligations under the Work Health and Safety Act, Sex Discrimination Act, Fair Work Act, and relevant anti-discrimination legislation.

2. Scope

This policy applies to all RTS employees, including permanent, part-time and casual.

Where appropriate, immediate family members may also access the Employee Assistance Program (EAP) in accordance with the provider's terms.

3. Policy Statement

RTS recognises that inappropriate workplace behaviour, discrimination, bullying, harassment, and unresolved grievances can create psychosocial risks to health and safety.

RTS is committed to:

- Promoting a workplace culture based on respect, dignity and inclusion
- Preventing and responding to bullying, harassment, sexual harassment and discrimination
- Providing clear, confidential reporting and grievance resolution pathways
- Supporting affected workers through appropriate measures, including access to the Employee Assistance Program (EAP)
- Ensuring employees can seek assistance without fear of stigma, victimisation, or adverse consequences
- Meeting its positive duty and WHS obligations to eliminate or minimise psychosocial risks so far as is reasonably practicable

4. Bullying and Harassment

RTS is committed to providing a workplace free from bullying and harassment.

Bullying is defined as repeated unreasonable behaviour that creates a risk to health and safety.

RTS will:

- Ensure all workers are aware of their rights and responsibilities regarding workplace conduct
- Implement reporting and investigation procedures to address complaints promptly and fairly
- Take appropriate corrective or disciplinary action where bullying or harassment is substantiated
- Provide training and support to promote a respectful and inclusive workplace culture

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5. Sexual Harassment (Positive Duty)

RTS maintains a zero-tolerance approach to sexual harassment.

Sexual harassment is defined as unwelcome sexual behaviour that makes a person feel offended, humiliated or intimidated.

RTS will:

- Take proactive and preventative steps to eliminate sexual harassment and related victimisation
- Ensure employees understand their rights and obligations under workplace laws
- Provide confidential and accessible reporting channels
- Respond promptly to incidents and conduct fair investigations
- Take appropriate disciplinary action against perpetrators
- Offer support services, including access to the Employee Assistance Program (EAP), to affected individuals

6. Equal Opportunity and Anti-Discrimination

RTS is committed to fostering a diverse and inclusive workplace by ensuring equal opportunity for all employees.

RTS will:

- Prohibit discrimination based on race, gender, age, disability, religion, sexual orientation, or other protected attributes
- Promote fair recruitment, training, and promotion processes
- Provide education on discrimination and inclusive workplace behaviour
- Investigate complaints thoroughly and take corrective action where required

7. Grievance Resolution

RTS encourages open communication and provides a structured process for resolving workplace grievances.

RTS will:

- Maintain a formal grievance resolution procedure
- Ensure grievances are handled impartially, confidentially, and without retaliation
- Encourage employees to raise concerns with their Supervisor, Manager, or HR
- Offer mediation and support services, including access to the EAP, where appropriate

8. Wilful and False Representation by Employees

RTS expects all employees to act with integrity and honesty.

Wilful and false representation includes falsifying information, making knowingly false or malicious claims, or engaging in deceptive conduct.

RTS will:

- Investigate allegations of wilful or false representation
- Take disciplinary action, up to and including termination, where misconduct is substantiated
- Reinforce ethical behaviour through training and workplace policies

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9. Employee Assistance Program (EAP) – WHS Addendum

9.1 Purpose of the EAP

RTS provides an Employee Assistance Program (EAP) to support employees experiencing personal or work-related issues that may affect their wellbeing, safety, or performance at work.

9.2 What the EAP Provides

The EAP offers confidential, short-term, solution-focused counselling and support, including assistance with:

- Work-related stress, fatigue, or burnout
- Mental health concerns (e.g. anxiety, depression)
- Bullying, harassment, sexual harassment or workplace conflict
- Relationship or family issues
- Grief, loss, or trauma
- Financial or legal concerns (general advice)
- Alcohol or other drug concerns

The EAP does not replace ongoing or specialised treatment but may provide referrals where required.

9.3 Confidentiality

All EAP services are strictly confidential. RTS will not be informed of:

- The identity of employees who access the EAP
- The reasons for accessing the EAP
- The content of counselling sessions

RTS may receive de-identified, aggregated usage data only.

9.4 Voluntary and Manager-Recommended Access

- Access to the EAP is voluntary and self-initiated
- Managers may recommend the EAP where wellbeing or fitness-for-work concerns arise
- Use of the EAP is supportive and does not constitute disciplinary action unless linked to a formal risk management or fitness-for-work process

9.5 WHS and Psychosocial Risk Management

The EAP forms part of RTS's WHS framework to:

- Identify and manage psychosocial hazards
- Support employees following complaints, investigations, or critical incidents
- Promote early intervention and recovery

10. Roles and Responsibilities

Employees

- Take reasonable care of their own health and wellbeing
- Treat others with respect and dignity
- Raise concerns early and access support when needed

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Managers and Supervisors

- Promote awareness of this policy and the EAP
- Respond appropriately to reports of misconduct or distress
- Maintain confidentiality and procedural fairness

RTS Management

- Ensure this policy is implemented and communicated
- Maintain access to an EAP
- Monitor trends and continually improve workplace conduct and wellbeing systems

11. No Detriment

Employees will not be disadvantaged, discriminated against, or treated unfavourably for making a complaint, participating in a process, or accessing the EAP.

12. Review and Continuous Improvement

This policy will be reviewed annually or earlier if required due to legislative change, organisational change, or identified risks. Employees are encouraged to contribute to maintaining a fair, safe and inclusive workplace.

Signed by Chief Executive Officer:



Shane Egan: …… 12/02/2026
(Name) (Signature) (Date)

Owner	Riverina Traffic Services Pty Ltd
Date of Adoption/Amendment	**Revision No:**
29 January 2019	1
24 February 2023	2
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