

## Australian Registry Investments

### ANTI-DISCRIMINATION, BULLYING & HARASSMENT POLICY

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#### Statement of Commitment

*Australian Registry Investments (ARI) is committed to providing a safe, diverse and respectful environment for staff, visitors and customers free from all forms of discrimination, bullying and harassment. By effectively implementing our Anti-Discrimination and Harassment Policy we will attract and retain talented employees and create a positive environment for staff, visitors and customers.*

#### **Scope**

This Policy applies to:

All ARI employees, contractors and visitors to the workplace. The “workplace” extends to external premises and events such as work-related training, conferences, formal and informal social gatherings; social media postings.

#### The Policy also applies to:

- How ARI provides services to clients and customers and how it interacts with other members of the public
- Staff interactions with other staff, clients, customers and other members of the public encountered in the course of their ARI role

#### **Policy Objectives**

The objectives of the Anti-Discrimination and Harassment Policy are:

- To create an environment which is free from discrimination and harassment and where all employees, contractors and visitors are treated fairly and with respect;
- Encourage the reporting of behaviour which breaches this Policy
- Treat all complaints in a sensitive, fair, timely and confidential manner
- Promote appropriate standards of conduct at all time

#### **Related Documents**

- [Interim] Behavioural Code
- [Interim] Grievance Policy
- [Interim] Disciplinary Policy
- [Interim] Recruitment and selection Policy

- [Interim] Workplace Health & Safety Policy

## **Responsibilities**

### ARI is responsible for:

- providing a workplace free from discrimination and harassment;
- maintaining and communicating its policy against discrimination and harassment;
- maintaining and communicating a procedure under which complaints of discrimination or harassment are handled;
- taking appropriate action against any employee or contractor who engages in discrimination or harassment or other conduct which is inconsistent with this policy.

### ARI employees are responsible for:

- behaving in a manner which is consistent with this policy and the law, including by not engaging in acts of discrimination, harassment, vilification or victimisation;
- completing training and refresher training regarding discrimination or harassment, as directed by ARI; and
- maintaining confidentiality if they are involved in a complaint.

### Leaders and Managers are additionally responsible for:

- ensuring team members are aware of this policy;
- immediately contacting Human Resources if they receive a complaint of discrimination or harassment, or if they become aware of behaviour by an employee or contractor which may be discrimination or harassment in breach of this policy;
- ensuring complaints of discrimination or harassment are treated confidentially and handled in accordance with the [interim] Grievance policy;
- intervening when inappropriate behaviour is observed or escalating the matter as appropriate;
- encouraging behaviour consistent with this policy; and
- implementing, in conjunction with Human Resources, any recommendations from investigations into allegations of discrimination or harassment.

## **What is Discrimination?**

Discrimination occurs when a person or group is treated “less favourably” than another person or group on the basis of a person’s:

- Gender
- Race or nationality
- Age
- Ethno-religious background
- Political opinion/affiliations
- Mental or physical disability
- Carers’ responsibilities
- Pregnancy
- Marital status
- Sexual preference
- Transgender identity

## Types of discrimination

There are generally five types of discrimination:

- *Direct discrimination* - treating somebody less favourably on the grounds of their sex, race, etc
- *Indirect discrimination* - applying a rule which in practice disadvantages one's sex, race, etc, and cannot be justified
- *Victimisation* - treating someone unfairly because, for example, they plan to raise a discrimination-related grievance or they support someone in raising a grievance

## Bullying and Harassment

Bullying or harassment in the workplace can be harmful to those who directly experience and witness such behaviour.

### What is Workplace Bullying?

Workplace bullying is "the repeated, unreasonable behaviour directed towards a worker, or group of workers, that creates a risk of physical and/or psychological harm". Unreasonable behaviours are "behaviours that a reasonable person would find offensive, humiliating, intimidating, degrading or threatening".

### What is Harassment?

Harassment is any unwelcome, unsolicited and inappropriate behaviour towards a person or group which a reasonable person, having regard to all the circumstances, would consider to be offensive, humiliating, intimidating or threatening.

Harassment does not require any intent to offend or harm in order for it to be unlawful; rather it is the impact of the behaviour on the recipient, and nature of that behaviour, which determines whether it is harassment. Be aware that some behaviour may offend some people, and not others.

## Sexual Harassment

A person sexually harasses another person if:

- a person makes an unwelcome sexual advance, or an unwelcome request for sexual favours to another person, or
- engages in any other unwelcome conduct of a sexual nature in relation to another person, in circumstances

in which a reasonable person, having regard to all the circumstances, would have anticipated that the other person would be offended, humiliated or intimidated

Discrimination, harassment and bullying is not only unacceptable, it is unlawful pursuant the relevant legislation.

## Procedure

If you feel that you've been discriminated against, harassed, or bullied or have witnessed workplace harassment or intimidation, you should immediately bring the matter to the attention of your immediate manager. If you feel that your immediate manager is not the best person to deal with the complaint, then the issue should be discussed with an alternative manager or Human Resources.

If you feel comfortable to do so, you may try to resolve any grievance directly with the person/s concerned. If this is not possible or appropriate, the complainant should proceed to conciliation.

### **Conciliation**

You can lodge a complaint with either:

- Your manager/supervisor or other senior staff
- The manager/supervisor of the other party
- Human Resources

Your designated manager (the manager of whom you've lodged the complaint) or a member of Human Resources will attempt to conciliate between the parties to reach an outcome acceptable to all parties concerned, including ARI.

### **Investigations**

If conciliation does not achieve the desired outcomes for all parties then continued investigations will be carried out. This would include collection of evidence, statements from parties and witnesses involved in the matter.

All investigations relating to any matters of this nature will be done promptly and fairly, and with the utmost sensitivity and care.

If a complaint is substantiated, necessary action will be undertaken to eliminate inappropriate behaviour. This may include disciplinary action against the person/s involved which may result in dismissal from employment.

### **Alternative procedures**

Complainants, respondents, and/or managers may seek advice or refer the matter to Human Resources at any time during the above-mentioned procedure.

### **Enquiries**

Advice in relation to this policy may be obtained from Human Resources.