

# Anti-Discrimination, Bullying, Harassment and Equal Opportunity Policy



GSS Group  
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GSS Group is committed to providing a workplace free of all forms of discrimination and harassment including bullying. It aims for equality of opportunity for all employees – both permanent and temporary – and is consistent with our policy of merit-based selection and promotion. By effectively implementing our Equal Opportunity (EO) Policy we will attract talented people and use their abilities to the maximum advantage for both the organisation and the employee alike.

Quality EO programs are increasingly part of what best-practice companies do to ensure the maximum contribution from their people by managing diversity effectively GSS Group seeks to make this best practice approach an integral part of our organizations culture. Discrimination and Harassment is not only **unacceptable** it is **unlawful** pursuant to state legislation (Equal Opportunity Act 1995, Racial and Religious Tolerance Act 2001) and federal legislation (Sex Discrimination Act, 1984; Racial Discrimination Act 1975; Disability Discrimination Act 1992; Human Rights and Equal Opportunity Commission Act 1986) and various Occupational Health & Safety legislation.

It is the responsibility of management to provide a working environment free from discrimination, harassment and bullying. To this end GSS Group will take all practicable steps to ensure our clients provide a similar working environment.

In addition, Management and their delegates are to ensure all complaints are treated confidentially, seriously and sympathetically. To this end, we have developed an internal complaint resolution process to assist our employees raise issues of concern. Relevant disciplinary action will be taken against anyone found to have breached this policy. No employee will be penalised or disadvantaged as a result of raising concerns or complaints relating to discrimination or harassment.

## What is Discrimination?

Unlawful discrimination occurs when a person considers they have been treated less favourably owing to an attribute (listed overleaf) when compared with a person not of that attribute.

Protected attributes in Victoria include:

- age
- disability/impairment
- industrial activity/inactivity
- lawful sexual activity
- gender identity
- marital status, including de facto
- physical features
- political belief or activity

- pregnancy/breastfeeding
- race
- religious belief or activity
- sex
- status as a parent or carer
- personal association with someone of the above attributes
- irrelevant criminal convictions

### **What is Harassment?**

Harassment is an unwanted behaviour and can take many forms. It may involve inappropriate actions, behaviour, comments or physical contact that is objectionable or causes offence. Unlawful harassment may relate to any of the attributes protected in various equal opportunity legislation mentioned above.

It is important to note that it is irrelevant at law as to whether or not the inappropriate behaviour was intended. It is also important to understand that it is the person being subjected to the behaviour, who determines whether the behaviour is welcome or unwelcome. In Victoria, co-workers can be named sole respondents in cases of alleged sexual harassment.

Harassment may be seen to have occurred if the behaviour makes the victim feel:

- offended and humiliated;
- intimidated or frightened; and/or
- uncomfortable at work

### **What is Sexual Harassment?**

Sexual harassment occurs when 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.

It has nothing to do with mutual attraction or private, consenting friendships whether sexual or otherwise.

Some examples of sexual harassment include:

- Persistent, unwelcome demands or even subtle pressures for sexual favours or outings;
- Leering, patting, pinching, touching or unnecessary familiarity;
- Offensive comments on physical appearance, dress or private life; and
- The public display of pornography (especially when it is directed at particular individuals) ranging from material that might be considered mildly erotic through to material that is sexually explicit.

GSS Group recognises that comments and behaviour, which do not offend one person, can offend another, the management/Board accepts that individuals may react differently and expects this right to be generally respected.

### **What is bullying?**

Workplace bullying is repeated, unreasonable behaviour directed toward an employee, or group of employees, that creates a risk to health and safety.

### **What is Victimisation?**

Victimisation is seen to occur when someone who has raised an equal opportunity complaint suffers a negative consequence as a result of raising that concern.

### **What can you do if you are being discriminated against?**

If you consider you have been discriminated against, raise your concerns with your manager, supervisor or account executive. These people should be in a position to give you the rationale behind any decision, which may have caused you to feel disadvantaged.

### **What can you do if you are being harassed or bullied?**

- do not ignore the harassment (ignoring the behaviour could be taken as consent)
- inform the offender that the behaviour is offensive and unacceptable and against company policy
- seek assistance in having the behaviour stopped. This may include making a report or a complaint

### **Who can assist you in Making a Report or Complaint?**

If you feel that you are unable to resolve the matter yourself, the following people will be able to assist you:

#### **Your Manager/Supervisor or Human Resources**

In addition to the management of GSS Group you may approach the Equal Opportunity Commission or WorkSafe for independent advice at any time

### **What will happen if you make a Complaint or Report?**

Any complaints or reports of discrimination, harassment or bullying will be treated quickly, seriously and sympathetically. They will be investigated thoroughly, impartially and confidentially. Managers, supervising consultants and the harassment program staff must act immediately on any reports of harassment. Employee will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.

### **What will happen to the person against whom you have Made a Complaint?**

Where complaints of discrimination have been substantiated, appropriate disciplinary action will apply. Serious breaches of the policy will lead to termination of employment. Similarly, action where necessary will be taken against anyone including employees or independent contractors, who have been found to have harassed a co-worker, or any other person during their employment.

All parties involved in a complaint have the option of accessing personal counselling via the organisation's EAP.

## **Our Commitment**

We place great emphasis on attracting and rewarding the best people. We are committed to providing an environment, which is safe and free of harassment and others with whom we associate at work.

This Anti-harassment policy has the full support and commitment of GSS Group Management and Board of Directors.

Please help us to help you by giving your support in monitoring and avoiding practices, attitudes and traditions which lead to harassment.

Endorsed by:

**Imran Mukhtar**

*Managing Director* February 2026

A handwritten signature in black ink, appearing to read 'Imran Mukhtar', written over a set of horizontal lines.