

# Equal Opportunity Employment Policy



GSS Group  
ABN: 12 668 595 382  
F01/122 Studio Ln, Docklands VIC 3008

**Date:** 03/02/2026  
**Review:** 01/02/2027

## 1. Purpose

GSS Group prides itself on being an equal employment opportunity employer and is committed to providing a safe working environment free of discrimination, vilification, bullying or harassment.

This policy applies to all workers including employees, volunteers and contractors engaged by GSS Group. It is applicable at the workplace and at any off-site events, during any work-related event, including off-site, at business trips, meetings, social events and training programs.

## 2. Application

This policy is binding and should be read in conjunction with other workplace policies. It does not form part of your employment contract.

Any worker (including employees, contractors or volunteers) who engages in any conduct that conflicts with this Policy will be subject to disciplinary action, which may include termination.

No worker will be penalised or disadvantaged for raising a genuine concern or complaint.

## 3. Discrimination

Discrimination is unlawful and not permitted at GSS Group.

Discrimination includes direct, indirect and non-deliberate discrimination. It involves any conduct which results in any individual being treated less favourably than another due to a specific characteristic of that individual, including:

- (a) race (including an individual's colour, nationality, descent and ethnic, ethno-religious or national origin);
- (b) marital status (including because an individual is single, married, divorced or in a de facto relationship);
- (c) age;
- (d) gender, transgender or intersex status;
- (e) sexual preference;

- (f) religious beliefs;
- (g) pregnancy and/or breastfeeding status (including because an individual might become pregnant or breastfeed);
- (h) disability (including a disability you think an individual might have, regardless of whether that person does have that disability)
- (i) carer's responsibilities (such as a responsibility to breastfeed, care for children or other family members)
- (j) political beliefs and/or activity; and/or union membership and/or activity.

It is also unlawful to treat an individual less favourably because they have a personal association with someone who has one or more of any of the above attributes.

It is not unlawful discrimination for reasonable adjustments to be made to cater to an individual's needs to assist them to perform their role, such as more frequent rest breaks for pregnant employees. It also does not include action taken because of a need to meet the inherent requirements of a role.

#### **4. Vilification**

Vilification is unlawful and it is not permitted at GSS Group to do any public act which vilifies an individual based on their race, sexual preference, gender (including transgender status) or HIV/AIDS status.

Vilification involves any public act which might encourage hatred, contempt or ridicule of an individual based on any of these characteristics.

Examples include but are not limited to speeches or statements in a public setting such as a workplace that vilify others, posting material on the internet or wearing clothing with slogans that vilifies others.

#### **5. Sexual Harassment**

Sexual harassment is unlawful and not permitted at GSS Group.

Sexual harassment involves any unwelcome behaviour that is of a sexual nature which a reasonable person in the given context would find offensive, humiliating or intimidating.

Examples of sexual harassment includes but is not limited to:

- (a) inappropriate physical contact, verbal comments, offensive jokes and sexual propositions;
- (b) communications that display offensive material (including posters or calendars);
- (c) offensive emails (including jokes);
- (d) requests for sex or other unwelcome sexual advances; and/or
- (e) unwelcome questions about a person's private life.

## **6. Workplace bullying**

Workplace bullying is unlawful and will not be tolerated at GSS Group.

Workplace bullying involves repeated and unreasonable behaviour that is directed towards another individual (or a group of individuals) that creates a risk to that individual's health and safety.

Repeated behaviour refers to a persistent nature of behaviour and can refer to a range of behaviours over time. Unreasonable behaviour means any behaviour that a reasonable person would consider to be unreasonable in those circumstances. It includes behaviour that is victimising, humiliating, intimidating or threatening.

Such bullying can include but is not limited to behaviour between an employee and their supervisor, or between employees, and both men and women can be the targets or perpetrators. It can range from very obvious verbal or physical assault to very subtle psychological abuse and may include:

- (a) physical (e.g. punching or kicking a person) or non-physical (e.g. verbal threats, sabotaging a person's work);
- (b) violence or threats of violence;
- (c) yelling, screaming or offensive language;
- (d) excluding or isolating another employee; and/or
- (e) psychological harassment.

Single incidents of such conduct may also present a risk to health and safety and will not be tolerated. Any workers (including employees, contractors or volunteers) who bully an individual or group of individuals will be subject to disciplinary proceedings that may include termination.

## **7. Reasonable management action**

Please note that reasonable management action does not constitute bullying if carried out in a reasonable manner. Managers are responsible for conducting performance reviews, managing employees and providing feedback on performance or work-related behaviour.

This may include negative feedback or comments which you may find uncomfortable, but it does not constitute bullying if carried out in a reasonable manner. Legitimate feedback, comments or advice about your performance or conduct at work, or feedback provided to assist you meet your performance goals does not constitute bullying. It also does not include taking disciplinary action that is reasonable and in line with company processes or allocating work to you in line with your role requirements.

## **8. Victimisation**

It is also unlawful and not permitted at GSS Group to victimise, threaten, intimidate or otherwise disadvantage a person who alleges that they have been discriminated against, vilified, bullied or harassed.

GSS Group will take all reasonable measures to ensure that any workers who

have spoken up about such issues in good faith are protected and not impacted negatively.

Any worker responsible for victimising another individual will be subject to disciplinary action, which may include termination.

#### **9. Vexatious or Malicious Complaints**

Any intentionally false allegations that are found to be of a frivolous or vexatious nature will be treated seriously, and if found to be intentional or malicious, may result in disciplinary action including termination.

#### **10. Lodging a grievance**

If you feel that you have been subjected to unlawful discrimination, vilification, victimised, bullied or harassed, please let us know promptly. We treat any such allegations seriously and confidentially.

You may notify us by speaking with your supervisor, Human Resources Manager, or in line with our existing grievance procedures. If you believe it is safe and reasonable to do so, you may also ask the person responsible for such behaviour to stop such behaviour. If neither of these are suitable options, speak with the next senior person in line with reporting procedures.

Your grievance will be taken seriously, investigated and if established, appropriate disciplinary action will be taken against the person engaging in such behaviour. There are formal and informal ways of managing a grievance, and you may advise us if you have a preference, with the person you have disclosed this information to assisting you if you are unsure. Your complaint will be treated confidentially, and your privacy will be respected and maintained as much as possible.

#### **11. External Contacts**

External agencies such as the Human Rights Commission, the Anti-Discrimination Board of NSW, or the Fair Work Ombudsman may also be able to assist. However, we encourage all workers, including contractors or volunteers to notify GSS Group first to ensure we can address the issue is addressed appropriately.

Endorsed by:

**Imran Mukhtar**

*Managing Director* February 2026

