

Harassment Policy



GSS Group
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Statement

GSS Group has high standards of workplace behaviour for its staff. These standards include a code of conduct for professional working relationships between staff. All employees have the right to enjoy good working relationships with each other and managers/supervisors. All employees should feel comfortable and respected in the workplace and they should be able to work in an environment free from harassment. In line with its standards, the Company takes its obligations seriously with respect to sexual and racial harassment and workplace bullying under federal and state law. Our commitment is reflected in this code of conduct.

Sexual or racial harassment and workplace bullying will not be tolerated under any circumstances.

Complaints will be investigated promptly, confidentially and impartially. Disciplinary action will be taken against any employee who breaches the policy.

Complainants and witnesses will be protected from victimisation or reprisals if they raise matters relating to sexual or racial harassment and workplace bullying.

Quick communication of a complaint in accordance with this policy is likely to result in the satisfactory resolution of a complaint. If the procedure does not resolve the problem, staff members should notify Management immediately so that appropriate steps can be taken.

All staff must familiarise themselves with this code.

Policy

This policy identifies behaviour, which is unacceptable and contrary to GSS Group, Staff Code of Conduct. The policy identifies consequences to infractions of the policy and means by which inappropriate behaviours can be addressed by management.

Scope

This policy applies to all staff employed or contracted by GSS Group.

It is GSS Group policy that all employees should work in a safe and supportive environment, where differences are respected. Everyone must be able to work in an environment free from harassment and bullying. All employees have the right to work in an environment free of bullying. They also have a responsibility to ensure they do not bully others.

GSS Group aims to:

- create a working environment which is free from sexual or racial harassment and workplace bullying and where all members of staff are treated with dignity, courtesy and respect
- provide an effective procedure for complaints based on the principles of natural justice
- treat all complaints in a sensitive, fair, timely and confidential manner
- guarantee protection from any victimisation or reprisals
- encourage the reporting of behaviour which breaches the sexual or racial harassment, violence or bullying policy
- promote appropriate standards of conduct at all times

Definitions

What is Sexual Harassment?

Sexual harassment is any unwanted, unwelcome behaviour of a sexual nature that makes a person feel humiliated, intimidated or offended.

Sexual harassment can take many different forms and may include physical contact, verbal comments, jokes, propositions, and the display of offensive material or other behaviour, which creates a sexually hostile working environment.

Sexual harassment can be constituted by a single act and is not limited to a course of conduct is not limited to conduct within normal working hours and includes conduct after hours if it occurs on a business related occasion, for example, at a seminar, client function or office party can occur even where there is no intention to cause harm is not limited to how a person treats fellow employees, it is also how a person treats customers and other persons with whom they have contact in the course of their employment

Some examples of sexual harassment are:

- physical contact (e.g. patting, pinching, embracing, kissing or brushing up against another's body)
- 'flashing' or sexual gestures sexual propositions or continued request for dates
- sexually oriented teasing or abuse
- statements (verbal or written) with sexual connotations, either directly to a person, or in his or her presence
- intrusive questions or insinuations about a person's private life
- unwelcome remarks about a person's appearance or body
- sexual jokes, abusive language, innuendos, offensive telephone calls, pornographic photographs, reading material or objects
- offensive e-mail messages or computer screen savers

There is no onus on the person being harassed to say he/she finds the conduct objectionable. Many people find it difficult to speak up. All employees are

responsible for their own behaviour. If you think the behaviour may offend, then don't do it!

What is not Sexual Harassment?

It is **not** sexual harassment to develop friendships with other workers. Sexual harassment is not behaviour, which is based on mutual attraction, friendship and respect. If the interaction is consensual, welcome and reciprocated it is not sexual harassment.

What is Racial Harassment?

Racial harassment involves threatening, abusing, insulting or taunting another person based on that person's race, and/or in circumstances where the other person is disadvantaged or reasonably believes that they would be disadvantaged by objecting to the threat, abuse, insults or taunts.

Racial harassment can take many forms, such as:

- can be constituted by a single act and is not limited to a course of conduct
- is not limited to conduct within normal working hours and includes conduct after hours if it occurs on a business-related occasion, for example, at a seminar, client function or office party
- can occur even where there is no intention to cause harm

Some examples of racial harassment might be:

- insulting jokes, suggestions or derogatory comments about another employee's racial or ethnic background
- insulting, threatening, abusive or taunting telephone calls, faxes or e-mails
- using language that is regarded as insulting to describe racial or ethnic groups
- possessing and displaying threatening or abusive posters or written material about a racial group

What is Workplace Bullying?

Workplace bullying is any behaviour that involves threatening, abusing, insulting or taunting another person.

Examples of such behaviour include:

- shouting or swearing at a person
- undermining them through any means
- using a position of authority unfairly
- Harassment is Unlawful
- any harassment is prohibited under anti-discrimination legislation. An employee who subjects another person to sexual or racial harassment and workplace bullying:
 - may be prosecuted personally (including possible criminal proceedings)
 - may be personally liable to pay compensation to the person concerned

- may incur liability for the Company to compensate the person concerned
- will be subjected to disciplinary action which may result in dismissal

What is workplace violence?

Any incident where an employee is physically attacked or threatened in the workplace. Some examples of workplace violence and some of these are also crimes.

- someone threatening to hurt you
- objects being thrown at you
- pushing, shoving, punching, kicking
- being touched up and any other type of indecent physical contact
- racial abuse
- unwelcome sexual comments

What is vilification?

Vilification is behaviour that:

- happens in a public place; and
- incites others to hate, to have serious contempt for or to severely ridicule individuals or groups because of their race, religion, sexuality or gender identity.

Workplaces can be considered public places. This means that any conduct which can possibly be observed by the public or any sort of communication either verbal or in writing to the public can be considered to have happened in a public place.

Some examples of vilification are:

- placing a poster or sticker on the customer service counter which incites others to hate people because of their race, religion, sexuality or gender identity.
- hate graffiti written on work toilet walls which incites hatred because of race, religion, sexuality or gender identity.
- wearing of symbols, badges or clothing in the workplace with slogans that incite hatred.
- an employee abusing a person because of their race, religion, sexuality or gender identity in the workplace which encourages others to hate people of that race, religion, sexuality or gender identity.
- a work colleague making a speech in the work cafeteria that incites hatred of people because of their race, religion, sexuality or gender identity.

Responsibilities of Management & Staff

All staff are responsible for ensuring that equal opportunity principles are respected. Managers and supervisors are responsible for understanding the legislation and ensuring that the workplace environment is safe and free from sexual harassment and the ongoing development and maintenance of this policy.

Managers and supervisors have a responsibility to:

- monitor the working environment to ensure that acceptable standards of conduct are always observed.
- model appropriate behaviour themselves.
- promote the organisation's sexual harassment policy within their work area.
- treat all complaints seriously and take immediate action to investigate and resolve the matter.

refer a complaint to Management if they do not feel that they are the best person to deal with the case (for example, if there is a conflict of interest or if the complaint is particularly complex or serious)

Informal Procedure

Where you elect to follow the informal procedure, the manager/supervisor you have approached (or another manager/supervisor at the appropriate level) will deal with the matter. In these circumstances there will be no investigation and instead the manager/supervisor will discuss the problem you have experienced and discuss possible solutions. The manager/supervisor will either:

- assist you to deal directly with the individual concerned to resolve the problem, or
- approach the individual concerned on your behalf.

Where a problem is not resolved under the informal procedure, you should approach the manager/supervisor or Management so that the formal procedure can be followed.

Formal Procedure

Where you elect to follow the formal procedure, the matter will be referred to Management who will undertake a full investigation and undertake all appropriate action.

The formal procedure is as follows:

- a full statement will be taken from you.
- the individual concerned will be informed of the allegations made by you and given an opportunity to respond.
- Management will consider what steps should be taken to investigate the matter and will discuss these steps with you and, in a separate meeting, with the individual concerned.

- Management will decide on the appropriate steps to investigate the matter further and may talk to you, the individual concerned and any other relevant person.
- Management will form an opinion on whether and, if so, what action should be taken and will discuss this with you and, in a separate meeting, with the individual concerned. Both of you will be given an opportunity to respond to how Management intends to deal with the matter.
- Management will then decide what, if any, action is appropriate and set this in motion. Management will inform you and the individual, again separately, of the action that has been taken.

Confidentiality

GSS Group will ensure that all complaints made under the policy are treated as confidential information and not disclosed to anybody other than those directly affected.

All employees are required to treat any allegation of sexual, racial harassment, violence and bullying, whether made by or against them, as confidential. These allegations should not be discussed with any person other than persons nominated under this policy.

This does not mean, however, that the individual employee cannot report this matter to the appropriate authorities under any law.

Helping Colleagues

How can you help colleagues?

If you believe a colleague is being harassed, you should offer your support and encourage your colleague to follow the steps set out in this policy and talk to someone who can help. **DO NOT** try to resolve the matter yourself.

Victimisation

Under anti-discrimination legislation, it is unlawful to threaten or otherwise victimize an employee, for example:

- for making or proposing to make a complaint
- for bringing or proposing to bring proceedings
- for asserting your rights or another person's rights under anti-discrimination legislation.

GSS Group will not tolerate victimization in the workplace. Employees should speak with Management if they are being victimized or are aware of instances of victimization.

Consequences for Breaching Policy

If a complaint of discrimination is substantiated, disciplinary action shall be taken against the offender.

If a complaint of sexual or racial harassment against an employee is substantiated and no effort is made by the offending individual to stop the harassment when counselled, then disciplinary action shall be taken against the offender. The Company regards such conduct as conduct justifying dismissal.

Reference

Equal Opportunity Act
1995 (VIC) WorkSafe
Victoria, June 2005

Federal Law

Age Discrimination Act
2004 (Cth) Disability
Discrimination Act 1992
Human Rights and Equal Opportunity
Commission Act 1986 Racial Discrimination Act
1975 Sex Discrimination Act 1984

Endorsed by:

Imran Mukhtar

Managing Director February 2026

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