



Equal Employment Opportunity and Discrimination Policy

1 Purpose

This policy outlines the Company's commitment to ensuring a respectful workplace by ensuring a workplace free of discrimination (at all levels within the organisation), and the equitable treatment of all current and prospective employees. Unacceptable conduct such as discrimination will not be tolerated and this policy provides detail on what constitutes discrimination, what is expected of employees of Ventia Group, and what actions an employee can take if they identify or experience discrimination in the workplace.

2 Scope

This policy applies to employees of Ventia (whether permanent, fixed, or temporary, and including directors, executives, and leaders) and any third party or subcontractor engaging in activity for, or on behalf of, Ventia. In this policy, the term employee or 'workforce' includes all these groups.

When a member of Ventia has a controlling position in a joint venture or similar arrangement this policy will be adopted for the joint venture or other arrangement. In other circumstances, Ventia will remain bound by this policy and will seek to have partners adopt this policy.

3 Principles

In line with Ventia's commitment to diversity and inclusion, all employees at Ventia have the right to work in an environment where they are treated respectfully. Respectful behaviour includes personal integrity and professionalism, practising fairness and understanding, demonstrating respect for individual rights and differences and accountability for one's actions.

Ventia is committed to creating respectful workplaces that are productive, rewarding, and enjoyable. They are environments where staff work well together and recognise that behaviours and attitudes affect others, and that each individual has the right to be treated with respect.

As outlined in our Code of Conduct Ventia is committed to promoting workplace equality and diversity. This includes ensuring a workplace free of discrimination (at all levels within the organisation), and to the equitable treatment of all current and prospective employees. Discrimination will not be tolerated and is not acceptable in any of our workplaces. Our people at all times are to be treated fairly, respectfully and with dignity.

Ventia further encourages and supports a workplace culture that allows employees a safe place to speak up about any behaviour that may be in breach of this policy.

3.1 Equal access

Equal Employment Opportunity (EEO) is a positive way of describing the absence of discrimination in the workplace. This means that decisions about selection and appointment of employees, promotion, training, remuneration, benefits, terms and conditions of employment and termination of employment are made on the basis of clear and objective



criteria, such as skills and abilities, rather than subjective and irrelevant characteristics, such as gender or race.

Ventia policies, practices, and procedures, will be applied in a non-discriminatory way which gives all current and prospective employees fair and equal access to opportunities within Ventia.

All appointments, transfers, training, and staff development opportunities will be made on the basis of merit.

4 Unacceptable workplace conduct

4.1 What is unlawful discrimination?

Unlawful discrimination is unacceptable and will not be tolerated. Unlawful discrimination can be either direct or indirect as follows:

- **Direct discrimination** occurs when a person with a protected attribute (for example, a disability) is treated less favourably than someone without that attribute in circumstances which are the same or substantially similar. For example, an employee is refused a promotion for being too old.
- **Indirect discrimination** occurs when an unreasonable requirement, condition or practice is imposed that has, or is likely to have, the effect of disadvantaging people with a protected attribute. For example, a workplace policy which states that Managers must work full time, would indirectly discriminate on the grounds of sex because women are more likely to work part time because of family responsibilities.

Generally, across Australia and New Zealand, the following attributes are protected against unlawful discrimination:

- sex
- race
- disability
- age
- marital status
- pregnancy or potential pregnancy
- breastfeeding
- family responsibilities, family status, parenthood, and responsibilities as a carer
- sexual orientation, gender identity, intersex status
- religious belief or activity
- association with a person who has a protected attribute.

Additionally, and depending upon the region, state or territory, the following may also be protected against unlawful discrimination:

- racial hatred
- physical features
- being affected by family violence
- political belief or activity
- trade union activity
- irrelevant criminal records or spent convictions.
- transgender, homosexual, and HIV/AIDS vilification.



All employees, contractors, subcontractors, and labour personnel must ensure they do not engage in discriminatory behaviour against other employees, other managers or supervisors, or clients and suppliers.

Leaders must ensure that employees, contractors, subcontractors, and labour hire personnel are aware that discrimination or harassment will not be tolerated.

4.2 What is victimisation?

Victimisation is subjecting or threatening to subject someone to a detriment because they have asserted their rights under equal opportunity law, made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment, or victimisation. Victimisation is against the law.

It is also victimisation to threaten someone (such as a witness) who may be involved in investigating an equal opportunity concern or complaint.

Victimisation is a very serious breach of this policy and is likely (depending on the severity and circumstances) to result in formal discipline if founded.

Ventia has a zero-tolerance approach to victimisation.

5 Objectives and strategies

5.1 Maintaining an equitable workplace free from discrimination

Ventia will:

- promote a work environment free from all forms of discrimination and one where you are treated with dignity, courtesy, and respect
- encourage you to report any discriminatory behaviour to your Leader or local People & Capability representative; and
- take action relating to complaints of bullying and harassment in a timely manner.

As provided within the Code of Conduct, all employees are responsible for treating everyone equally; there are no exceptions. Employees must therefore never engage in actions or behaviours that constitute discrimination. Each employee is responsible for ensuring that they consider the implications of their behaviour at all times and take necessary corrective steps, including:

- supporting and encouraging colleagues to act appropriately and/or to raise a business conduct concern if they do not
- ensuring all consultants, contractors, and visitors to Ventia workplaces are treated with the same respect as employees
- being prepared to adapt behaviour in recognition that actions or behaviour acceptable in one culture may not be acceptable in another
- ensuring that when travelling or working in another site, office or country, the employee and any accompanying business associates and family members are familiar with local behaviours, practices, and customs, and show respect for these in all business dealings
- undertaking appropriate cross-cultural training, for example when being assigned to a different operation or culturally sensitive location
- always seeking advice from local management if you have any queries.



The impact discrimination at Ventia can be serious. It can lower morale, productivity, and performance standards, and increase absenteeism and decisions to resign.

5.2 Raising concerns or making a complaint

If an employee believes they have been subjected to bullying or harassing conduct in the workplace, the employee is encouraged to raise their concern or to make a complaint in one of the following ways:

- if comfortable to do so, discuss the concern with the other worker; or
- if not comfortable to directly discuss the concern with the other worker, notify one of the following:
 - your manager or supervisor (or One Up Leader if the concern relates to your leader), or
 - the relevant People & Capability (P&C) representative.

Depending on the particular circumstances, regard may also be had to Ventia's Whistle-Blower Protection Policy.

In addition, employees and their families have access to Ventia's Employee Assistance Program (EAP). This is a confidential and independent service (Australia contact 1800 808 374, New Zealand contact 0800 200 277).

5.3 Handling complaints

Ventia will:

- promptly respond to complaints of discrimination raised by a worker against another worker
- protect the individuals making a complaint as well as any witnesses from victimisation.

The process and conduct of Ventia's response will vary and be determined on a case-by-case basis, taking into account all relevant circumstances associated with the complaint.

Wherever appropriate, in the first instance, complaints will be dealt with in accordance with Ventia's Grievance Standard as an issue, concern, or complaint.

However, where the conduct complained of is serious enough to constitute serious misconduct if proven, the complaint will be dealt with under the Code of Conduct.

5.4 Maintaining confidentiality

It is unacceptable for employees to talk with other team members, clients, or suppliers about any complaint of discrimination or harassment.

Breaching the confidentiality of a formal complaint investigation or inappropriately disclosing personal information obtained in a professional role (for example, as a manager) is a serious breach of this policy and may lead to formal discipline.



5.5 Disciplinary action

Depending on the seriousness of the conduct, disciplinary or other remedial action will be taken against any person who discriminates or harasses another person whether they are an employee, a subcontractor, visitor, or a member of the community in which an employee is located. In the case of an employee, appropriate action may include termination of employment.

Disciplinary action may also be taken against any employee who victimises or retaliates against a person who has made a discrimination complaint under this policy. In the case of an employee, appropriate action may include termination of employment. Ventia may take disciplinary action against an employee who makes vexatious or frivolous complaints. In the case of an employee, appropriate action may include termination of employment.

Other laws might also apply, such as various applicable criminal codes.

6 Key accountabilities

All workers must:

- treat other employees, contractors, clients/suppliers, visitors, and community members fairly and with respect
- not discriminate against other employees, contractors, clients/suppliers, visitors, and community members
- not encourage discrimination
- comply with EEO guidelines, legislation and the EEO program and standards and procedures
- not bring vexatious claims of discriminatory behaviour.

Leaders must:

- implement EEO initiatives related to their respective areas
- ensure EEO principles, legislation and guidelines are implemented and upheld
- take appropriate steps to ensure all work practices and behaviours in the workplace are fair and equitable and provide all employees with equal access to fair, prompt, and confidential processes to deal with concerns, grievances, and complaints.

People & Capability representatives must:

- maintain employee awareness regarding EEO matters through activities such as EEO awareness training and the general promotion of EEO throughout the business, including at the induction of all employees
- investigate or assist with managing the investigation of discrimination grievances or complaints.

Executive General Managers (EGM) and General Managers (GM) must:

- ensure the effective management of EEO within the relevant business unit
- in conjunction with the People & Capability Representative (P&C), promote and maintain an environment of where all employees are aware of their individual EEO responsibilities and where EEO is given sufficient recognition at the management level.



7 Display requirements

Where a policy is required to be displayed for compliance or marketing purposes – eg, wall poster or booklet format – the formatting and style is to be developed in consultation with the Brand, Marketing and Communications (BMC) team.

Ownership of the policy and content remains with the relevant Functional Executive General Manager (EGM) irrespective of the format.

The Function (EGM) is also responsible for updating or rewriting the policy to suit the new format such as summarising the content or extracting the most relevant information.

BMC is responsible for converting the new text into the selected format.

8 Related documents

- Bullying and Harassment Policy
- Code of Conduct
- Diversity and Inclusion Policy
- Fair Play Guide
- Grievance Standard
- Whistleblower Protection Policy

Owner	Group CEO		
Advisory to Owner	Group Executive, People & Capability		
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