

Equal Employment Opportunity (EEO), Anti-Discrimination and Anti-Bullying

This policy applies to all staff including contractors and covers all work-related functions and activities:

It also applies for all recruitment, selection and promotion decisions.

The objective of our EEO, Anti-Discrimination and Anti Bullying Policy is to improve business success by:

- Attracting and retaining the best possible employees.
- Providing a safe, respectful and flexible work environment.
- Delivering our services in a safe, respectful and reasonably flexible way.

Discrimination, Sexual Harassment and Bullying

Sperling is committed to providing a workplace free from discrimination, sexual harassment and bullying. This kind of behaviour will not be tolerated and may lead to disciplinary action up to termination.

Definitions:

Direct discrimination occurs when someone is treated unfavourably because of a personal characteristic that is protected under Legislation.

Indirect Discrimination occurs when a rule seems neutral but has a discriminatory impact on certain people. For example a minimum height requirement for a particular job might be applied equally to men and women, but may indirectly discriminate on the basis of sex, as women tend to be shorter than men.

Sexual Harassment includes unwelcome conduct of a sexual nature in circumstances in which it could reasonably be expected to make a person feel offended, humiliated or intimidated a reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated.

Workplace bullying may include behaviour that is directed toward an employee, or group of employees, that creates a risk to health and safety e.g. physical and/or verbal abuse, excluding or isolating individuals; or giving impossible tasks. It does not include reasonable management action or reasonable disciplinary action.

We provide equal opportunity in employment to people without discrimination based on personal characteristics protected under state and federal equal opportunity legislation such as:

- Age.
- Pregnancy and/or breastfeeding.
- Carer status.
- Disability.
- Employment activity.
- Gender identity.
- Industrial activity.
- Lawful sexual activity.
- Marital status.
- Parental status.
- Personal association with someone having any of these characteristics.
- Physical features.
- Political activity/belief.
- Race.
- Religious activity/belief.
- Sex.
- Sexual orientation.

Employees must report any behaviour that constitutes sexual harassment, bullying or discrimination to their manager. Employees will not be victimised or treated unfairly for raising an issue or making a complaint.

Any employee found to have breached this policy will be subject to disciplinary action, which may include dismissal as outlined in the complaint procedure below.

Reasonable Adjustments

Reasonable adjustments are changes that allow people with a disability to work safely and productively.

We will endeavour make reasonable adjustments for a person with a disability who:

- Applies for a job, is offered employment, or is an employee.
- Requires the adjustments in order to participate in the recruitment process or perform the genuine and reasonable requirements of the job.

When considering reasonable adjustments we will weigh up the need for change with the expense or effort involved in making it. If making the adjustment means a very high cost or great disruption to the workplace, it is not likely to be reasonable.