



AWI GROUP POLICY DEALING WITH EQUAL OPPORTUNITY, ANTI- DISCRIMINATION, HARASSMENT, VICTIMISATION AND BULLYING AND GRIEVANCE PROCEDURES

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Jurisdiction: Global

Document Owner: GM, People & Culture

Reviewed Date: October 2024

Next Review Date: October 2025

Version: #7

DATE	APPROVED BY	VERSION #	AMENDS
October 2024	PCC / BOARD	7	Inserted reference to SafeWork NSW Code of Practice Sexual and Gender-based Harassment
October 2023	PCC / BOARD	6	Amended references from he/she to they
October 2022	PCC / BOARD	5	Amended to include reference to the company's commitment to impose a positive duty to prevent sexual harassment in the workplace, in accordance with the recommendations set out in the Respect@Work Report.
October 2021	PCC / BOARD	4	Amended to include the fact that Sexual harassment is defined as "serious misconduct" under the Fair Work Regulations 2009 (Cth) and may therefore be grounds for termination of employment without notice.
October 2020	PCC / BOARD	3	See previous version
October 2019	PCC / BOARD	2	See previous version
November 2018	PCC / BOARD	1	Created

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Policy dealing with

- Equal Opportunity, Anti-Discrimination, Harassment, Victimisation and Bullying
 - Grievance Procedures
-

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Policy dealing with:

- Equal Opportunity, Anti-Discrimination, Harassment, Victimisation and Bullying
 - Grievance Procedures
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1. Scope and Application of this Policy

- This Policy applies to the behaviour of all employees (including Directors) of Australian Wool Innovation Limited (“**AWI**”), while they are at the workplace, and also when they are performing work for or representing AWI away from the workplace.
- This Policy also applies to the behaviour of all other persons who provide services for AWI (including contractors, subcontractors, labour hire workers, work experience students or trainees) whilst at work. These persons and employees are collectively referred to as “**Workers**” in this Policy.
- This Policy applies to behaviour that occurs during and outside of working hours (in so far as that outside of hours conduct is connected with the Worker’s engagement with AWI or has an impact on the reputation or business activities of AWI) which may include when Workers are:
 - (a) carrying out, or acting in the course of their duties;
 - (b) providing services for AWI;
 - (c) at work functions (including out of ordinary business hours) such as team dinners, Christmas parties, client functions or any other functions arranged or authorised by AWI;
 - (d) representing AWI, for example, at a conference (including after hours during conferences), or entertaining clients on an informal basis;
 - (e) travelling for work purposes;
 - (f) engaging in social media; or
 - (g) otherwise acting within the course of their employment or engagement.
- This Policy applies to the way Workers interact with:
 - (a) job applicants;
 - (b) other Workers;
 - (c) visitors; and
 - (d) clients and other members of the public.
- AWI considers inappropriate behaviour which is engaged in “privately” in connection with work to be unacceptable. Examples include Workers sending “private” emails between each other on the work email system, “private” conversations between

workers in the workplace during a break or communicating through social media either during or outside of work hours.

2. Status and Nature of this Policy

- This Policy sets out AWI's position on equal opportunity, discrimination, harassment, victimisation, bullying and other improper and unlawful conduct. This Policy also sets out AWI's grievance procedures for dealing with these matters.
- This Policy replaces all previous policies issued by AWI dealing with the subject matters set out in this Policy.
- AWI may at any time vary, replace or withdraw this Policy unilaterally. This Policy does not impose any contractual obligations on AWI. This Policy does not form part of any Worker's contractual arrangements with AWI. To the extent that this Policy requires AWI Workers to do or refrain from doing any act, it constitutes a direction from AWI with which Workers must comply or face possible disciplinary action. Disciplinary action may include the termination of a Worker's employment or engagement.
- This Policy contains a summary of some laws relating to anti-discrimination, harassment and bullying. However, these laws may change from time to time. For a full and current understanding of these laws, you should refer to the relevant legislation.

3. Purpose of this Policy

- The purpose of this Policy is to assist AWI with promoting a workplace where:
 - (a) all decisions about Workers are made on relevant factors such as merit, qualifications and expertise, rather than on any discriminatory or otherwise unlawful grounds;
 - (b) there is a safe working environment for all Workers;
 - (c) Workers perform their work professionally and do not engage in improper or offensive conduct; and
 - (d) Workers have a readily accessible avenue for complaint in relation to improper conduct.
- All unacceptable workplace behaviour outlined in this Policy is contrary to AWI's values, and may result in the taking of disciplinary action, up to and including termination of employment or engagement (including summary termination), against a Worker who engages in unacceptable workplace behaviour and/or those who permit or assist in the behaviour.
- Workers should be aware that they are responsible for their own actions and that any claims of unacceptable workplace behaviour may result in civil or criminal proceedings against them in an individual capacity, as well as exposing AWI to the risk of liability.

- Tribunals and Courts may impose personal fines on, or award damages against, an individual found to have engaged in unlawful discrimination, bullying, harassment, victimisation or vilification or for breach of health and safety legislation.

4. Workplace Behaviour Responsibilities

- All Workers are expected to contribute to creating an inclusive work environment, where individuals are respected and treated with courtesy.
- AWI has a responsibility to take reasonable steps to prevent discrimination, harassment, bullying, victimisation, vilification and violence from happening in the workplace. This involves educating Workers about inappropriate behaviour, putting this Policy in place and making grievance procedures available.
- In addition to these actions, AWI will take all reasonable and proportionate measures available to it to eliminate the risk of sex discrimination, sexual harassment and victimisation occurring in the workplace. This includes, but is not limited to, regular training and development, as well as the assessment of employee awareness and compliance with expected standards of behaviour. You may refer to the “Code of Practice Sexual and Gender based Harassment” at Safework.nsw.gov.au for more details.

Workers

- Each Worker must:
 - (a) ensure that he or she does not discriminate against, harass, bully, victimise, vilify or engage in workplace violence against any Workers;
 - (b) not aid, abet or encourage other persons to engage in discrimination, harassment, bullying, victimisation, vilification or violence;
 - (c) not engage in gossip or inappropriately disclose personal information about others;
 - (d) maintain confidentiality of a formal investigation;
 - (e) treat others with courtesy and respect;
 - (f) comply with this Policy; and
 - (g) remain aware that they may individually be held legally responsible for their acts and may be subject to disciplinary action.

Managers

- Managers have an important role in the prevention of inappropriate workplace behaviour. Managers must endeavour to comply with the responsibilities applicable to all Workers as well as:
 - (a) model appropriate workplace behaviour;
 - (b) take reasonable steps to ensure that their team is aware of this Policy;

- (c) take steps to stop inappropriate behaviour when they observe unacceptable workplace behaviour;
- (d) take appropriate steps to deal with complaints raised with them; and
- (e) not victimise any Worker who has lodged a complaint under this Policy.

5. Equal Opportunity

- AWI is an equal opportunity employer. This means that AWI strives to ensure that opportunities for all Workers are determined on individual job performance, ability and potential, without regard to factors such as sex, race, disability, age, religion, marital status, sexuality, transgender status, family responsibilities or other protected grounds under discrimination legislation (including the Prohibited Grounds as set out below in this Policy).
- All Workers and job applicants will be assessed according to their skill, qualifications, abilities, prior work performance, aptitude and general ability to perform the inherent requirements of a role in question where a decision is to be made about hiring, job allocation or promotion.

6. Unlawful Discrimination

- AWI does not condone or authorise practices that are unlawfully discriminatory in the processes of hiring, assignment, performance assessment or promotion.

What is discrimination?

- Discrimination in the area of work is unlawful or prohibited under Federal, State and Territory legislation. Discrimination can take the form of either direct or indirect discrimination.
- Direct discrimination means less favourable treatment in the same or similar circumstances on the basis of one of more unlawful grounds as provided in anti-discrimination legislation. For example, a female employee being demoted because she is pregnant, telling jokes about someone or teasing them because of their race, or failing to employ someone because of a disability.
- Indirect discrimination means a condition, requirement or practice adopted which appears to treat everyone the same, but:
 - (a) is more difficult for a person or a group of persons to comply with because of an attribute protected by anti-discrimination laws in circumstances where other persons (who are in similar circumstances but do not possess the same attribute) are able to comply with that condition, requirement or practice or find it less difficult to comply with it; and
 - (b) is unreasonable in the circumstances.

For example, a requirement that employees work full-time to receive a particular benefit may amount to indirect discrimination against employees with family responsibilities who work part-time

Grounds of discrimination

- The following grounds of discrimination are unlawful or prohibited under Federal, State or Territory legislation and are prohibited under this Policy (“**Prohibited Grounds**”):
 - sex
 - marital or relationship status
 - family responsibilities (including parental status)
 - breastfeeding
 - HIV/AIDS
 - mental, intellectual or psychiatric disability/ impairment (including imputed disability/ impairment)
 - sexuality e.g. heterosexuality/ homosexuality
 - transgender status and gender identity
 - national or ethnic origin
 - race
 - colour
 - descent
 - physical features (Victoria only)
 - carers' responsibilities
 - pregnancy (including potential pregnancy)
 - age
 - compulsory retirement
 - criminal record (subject to important exceptions)
 - political opinion
 - trade union or employer association activity
 - medical record
 - religion
 - immigration
 - physical disability
- It is also unlawful to discriminate against another person because they are associated with a person who has attributes relating to one of the Prohibited Grounds.

Exceptions to the rule

- Discrimination laws do contain a number of exceptions. For example, discrimination in the area of employment may not be unlawful where:
 - (a) the ground of discrimination constitutes a "genuine occupational qualification"; or
 - (b) the employee cannot perform the inherent requirements of the position, or requires services or facilities to do so, but the provision of those will impose an unjustifiable hardship on AWI.
- There are also other exceptions under relevant State, Territory and Federal laws.

How do I report a complaint about Discrimination?

- AWI encourages Workers to report any discrimination that they have experienced or witnessed, promptly and in accordance with the "Raising Grievances" section of this Policy.
- Victimisation of a person for making or participating in a complaint is not acceptable and will not be tolerated, as set out in the "Victimisation" section of this Policy.

7. Unlawful Harassment

- It is unlawful to harass Workers that you come into contact with as a result of your work, on the basis of a Prohibited Ground.
- Unlawful harassment will occur if you engage in conduct that is:
 - (a) unsolicited or unwelcome;
 - (b) related to a Prohibited Ground (e.g. race, gender, religion); andin circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.
- AWI considers harassment on any grounds to be unacceptable workplace behaviour.
- It may only take a single act to constitute unlawful harassment, and it doesn't matter if you do not intend to hurt, humiliate or offend someone. Remember, just because you think something is funny, does not mean that other people will not be offended
- Harassment can occur by way of physical conduct, in writing, and on emails. Examples of harassment include, but are not limited to:
 - (a) ridiculing a person based on their skin colour;
 - (b) circulating racist jokes or cartoons;
 - (c) impersonations or racial stereotypes;
 - (d) patronising a person because of their age;
 - (e) derogatory nicknames based on a person's sexual orientation; and
 - (f) making insulting and humiliating comments to a person with a disability.

Sexual Harassment

- Sexual harassment is a discrete form of unlawful harassment. Unlawful sexual harassment will occur if you engage in conduct:
 - (a) which is of a sexual nature;
 - (b) which is unsolicited or unwelcome; and

- (c) a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated, or intimidated.
- There is no requirement that the harasser intends to offend, humiliate or intimidate another person. Sexual harassment is not limited to a person of one sex harassing a person of the opposite sex and it can be carried out against a person of any gender. It is unnecessary for a person to object to the behaviour at the time it occurs.
- The following are some examples of conduct, which, if unwelcome, may constitute unlawful sexual harassment:
 - (a) repeated unsolicited requests for dates or declarations of love;
 - (b) asking to go away for a “dirty weekend”;
 - (c) commenting on a Worker’s relationship;
 - (d) threats to treat persons unfavourably unless they engage in sexual conduct;
 - (e) promises to provide persons with benefits or employment if they engage in sexual conduct;
 - (f) sexual advances - whether they involve touching or not;
 - (g) sexual epithets, jokes, written or verbal references to sexual conduct, gossip regarding one’s sex life, comment on an individual’s body or appearance, comment about an individual’s sexual activity, deficiencies, or prowess;
 - (h) staring at a person or parts of their body;
 - (i) gender-based insults or taunting;
 - (j) displaying sexually suggestive objects, pictures, cartoons;
 - (k) sexually offensive internet material, social media posts, screensavers, or emails;
 - (l) leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
 - (m) conversations or innuendo of a sexual nature including via email or by text message;
 - (n) behaviour which would be an offence under criminal law such as sexual assault, indecent exposure or stalking;
 - (o) behaving in an inappropriate and unwanted sexual manner towards a former partner;
 - (p) pranks such as setting up a room to appear as though staff members have used the room for a “sex romp”;
 - (q) inquiries into one’s sexual experiences; and
 - (r) discussion of one’s sexual activities.

- Conduct of a sexual nature which is not specifically directed at a particular person can be sexual harassment and/or sex discrimination. For example, office banter of a sexual nature may intimidate or offend others who hear the discussion but do not participate in it, whether or not they expressly object to it.
- Where behaviour is invited, consensual or reciprocated, it is not unlawful. However, care needs to be exercised in considering whether such behaviour is genuinely invited or welcomed from the perspective of the person to whom the behaviour is directed. Simply because a person is in a consensual relationship or maintains a friendship with another person does not mean that sexual behaviour will be consensual. Sexual behaviour which has not been consented to by a friend or partner will still be unlawful. The fact that an individual might think they are flattering a person does not mean it cannot be sexual harassment.
- A person may think that their conduct is welcome or inoffensive, when in fact the recipient finds it distasteful but goes along with it to avoid a confrontation. This can happen where there is a difference in age, racial or cultural background, seniority or personal power between those concerned.
- Sometimes workplace participants feel they have to join in to avoid being victimised, teased or excluded by their workmates. Relationships can sour or change, messages can be misread and the line between what is welcome and unwelcome can be crossed. What may be acceptable socially or in private life could well be inappropriate in a work context.

How do I report a complaint about Harassment?

- AWI encourages Workers to report any harassment that they have experienced or witnessed, promptly and in accordance with the "Raising Grievances" section of this Policy.
- Victimisation of a person for making or participating in a complaint is not acceptable and will not be tolerated as set out in the "Victimisation" section of this Policy.

If a Worker is found to have engaged in harassment, he or she may be subject to disciplinary action, up to, and including, termination of employment or engagement. In particular, sexual harassment is defined as "serious misconduct" under the *Fair Work Regulations 2009 (Cth)* and may therefore be grounds for termination of employment without notice.

8. Bullying

- Bullying is another type of behaviour that AWI does not condone. Bullying may include, but is not limited to, behaviour which is otherwise unlawfully discriminatory or harassing.
- Bullying occurs in a workplace context where a Worker (or group of Workers):
 - (a) engages in repeated unreasonable behaviour toward another Worker (or group of Workers); and
 - (b) that behaviour creates a risk to the Worker's health and safety.
- A risk to health and safety includes both physical and mental health and safety.

- Bullying may include, but is not limited to the following types of behaviour:
 - (a) name calling or derogatory comments;
 - (b) spreading rumours;
 - (c) verbal or physical abuse;
 - (d) using a position of dominance to pressure an individual unreasonably;
 - (e) creating a hostile working environment;
 - (f) unreasonably excluding or isolating others;
 - (g) physical contact or assault;
 - (h) practical jokes;
 - (i) deliberately undermining work performance, for example, by refusing to give sufficient instructions, imposing unnecessary deadlines or impossible assignments;
 - (j) belittling an individual's contribution or opinion;
 - (k) misusing a performance management system, or a return to work process; and
 - (l) publicly criticising an individual or group of individuals.
- Bullying can occur between peers, or between a supervisor and subordinate (and can include "upwards" bullying of a supervisor by a subordinate or subordinates).
- Bullying can occur in a number of ways, including face-to-face, over the phone, via email, instant messaging, text messaging and social media or a combination of all of these forms.
- Bullying can be a contravention of health and safety legislation. Where a person is bullied because of an attribute protected by anti-discrimination legislation, such as race or age, it may also be unlawful under anti-discrimination legislation. Bullying of any nature is considered unacceptable workplace behaviour by AWI. Even where the conduct of a Worker does not amount to bullying, the conduct may be deemed inappropriate by AWI and the Worker may be subject to disciplinary action.

Reasonable Management Action

- Bullying does not include reasonable management action carried out in a reasonable manner.
- A manager may take reasonable action to direct and control the way work is carried out.
- Examples of reasonable management action include:

- (a) setting reasonable performance goals, standards and deadlines in consultation with Workers and after considering their respective skills and experience;
- (b) allocating work to a Worker in a transparent way;
- (c) fairly rostering and allocating working hours;
- (d) transferring a Worker for legitimate operational reasons;
- (e) deciding not to select a Worker for promotion, following a fair process;
- (f) informing a Worker about unsatisfactory work performance in a constructive way and in accordance with any workplace policies or agreements;
- (g) informing a Worker about inappropriate behaviour in an objective and confidential way;
- (h) implementing organisational changes or restructuring;
- (i) performance management processes; and
- (j) appropriate application of a grievance process.

How do I report a complaint about Bullying?

- AWI encourages Workers to report any bullying that they have experienced or witnessed, promptly and in accordance with the "Raising Grievances" section of this Policy.
- Victimisation of a person for making or participating in a complaint is not acceptable and will not be tolerated as set out in the "Victimisation" section of this Policy.
- If a Worker is found to have engaged in bullying, he or she will be subject to disciplinary action, up to, and including, termination of employment or engagement.

9. Vilification

- Vilification is where a person publicly abuses or derides another person because of a particular attribute. The threshold for whether the public use of acts or words (including but not limited to written or spoken conduct) constitutes vilification varies under different legislative schemes. For example, in NSW the test is whether the conduct provokes hatred, ridicule or contempt for a person or a group of people, while under the federal Racial Discrimination Act, the test is whether the act is reasonably likely in all the circumstances to offend, insult, humiliate or intimidate another person or group of people.
- Examples of vilification include, but are not limited to:
 - (a) displaying or communicating offensive material;
 - (b) uploading offensive material on the internet, Twitter or Facebook;
 - (c) calling people names; and

- (d) making offensive comments in public.

10. Dealing with Third Parties

- AWI will not tolerate third parties (such as contractors, customers, suppliers or other contacts) subjecting its Workers to discriminatory conduct, harassment, bullying or other improper conduct.
- Workers should promptly report if they have experienced or witnessed such conduct in accordance with the "Raising Grievances" section of this Policy.
- Similarly, Workers must not subject third parties to such inappropriate conduct.
- All Workers are expected to behave in a professional, courteous and respectful manner consistent with the values of AWI in their interactions with other staff, customers of AWI and external parties. All Workers need to remember that they are representatives of AWI and their conduct impacts the reputation of AWI.

11. Raising Grievances

- AWI encourages early reporting and action on grievances. All grievances will be dealt with as quickly as is possible in the circumstances.
- If a grievance arises in the workplace, the Worker is encouraged to first attempt, where and if appropriate, to settle the grievance informally by directly discussing the grievance and issues with the other party or parties to the grievance with a view to seek to resolve the issue.
- AWI also encourages Workers to discuss problems, ideas or questions relating to the subject matter of this Policy with anyone in AWI's management (this includes the Worker's Manager as well as management in the AWI Head Office). Sometimes, Workers find that a frank talk with their Manager may be the most effective way to deal with a problem or suggestion.
- However, AWI recognises that there may be some occasions when Workers do not feel comfortable raising an issue with their Manager. For example, the Worker may feel threatened, because they wish to raise a concern about the conduct of the Manager. Likewise, the matters that the Worker wishes to raise may be very serious, such as threats to the Worker's personal safety, and it would be more appropriate to go straight to a Grievance Contact Officer (see below).
- If the results of a discussion with a Manager are not satisfactory, or if, for any reason, the Worker does not feel comfortable raising an issue with the Worker's Manager, the Worker is encouraged to speak to a Grievance Contact Officer or any member of AWI's management. While not all problems can be solved as a Worker might wish, AWI's Grievance Procedure is designed to ensure that AWI's management is aware of problems, responds appropriately and promptly.
- A Worker's grievance may be investigated by AWI or by an external and independent party.
- Any manager who observes behaviour which may constitute discrimination, harassment, victimisation or bullying or otherwise becomes aware of such behaviour

should promptly notify the People & Culture team or a Grievance Contact Officer, who may arrange for an investigation if deemed appropriate.

Grievance Contact Officers:

- If a Worker wishes to raise a grievance and does not feel comfortable doing so with the Worker's manager, or the Worker has already exhausted this option, the Worker should raise it with one of AWI's Grievance Contact Officers.
- The Grievance Contact Officers are as follows:

General Manager People & Culture, currently Daniela Giorgiutti. Contact details: daniela.giorgiutti@wool.com or +61 (0)417 685 011;

People & Culture Manager, currently Jess Grouse. Contact details: jessica.grouse@wool.com or + 61 2 8295 3111;

Chief Executive Officer, currently John Roberts. Contact details: john.roberts@wool.com or + 61 (0)400 107 950; and

Company Secretary, currently Lucy Meadley. Contact details: lucy.meadley@wool.com or + 61 (0)400 119 258.

How is a complaint investigated?

- AWI takes all grievances made by Workers seriously. There is no "one-size fits all" approach to dealing with issues that arise in the workplace. For this reason, AWI, in its absolute discretion, reserves the right to address and manage a grievance in a manner it considers appropriate in the circumstances. This Policy sets out examples and guidance around the way this may occur, but it is not a mandatory process for either Workers or AWI.
- When AWI receives a complaint, AWI may investigate the allegation if AWI deems it appropriate to do so in all the circumstances. Any investigation will be conducted in such a way as to maintain confidentiality to the extent practicable in the circumstances. Different types of complaints may call for different types of investigative action. However, the following is only a guide as to what might occur if an investigation is commenced.
- AWI's investigation may include (without limitation) a private interview with the complainant and, where appropriate, with witnesses. AWI may also interview the person or persons alleged to have engaged in the conduct. When AWI has completed its investigation, AWI may, to the extent it believes is appropriate, inform the person issuing the complaint of the results of that investigation. If it is determined that inappropriate conduct has occurred, AWI will act accordingly.
- AWI will aim to deal with any grievance in a manner that aims to preserve the working relationships of the parties involved. Grievances will be handled in a manner sensitive to the needs of the complainant, the person subject to the complaint, and all other affected parties.
- AWI strives to carry out investigations in a prompt manner. This may not always be possible depending on the circumstances. However, the complainant and the person or persons alleged to have engaged in the conduct will be informed of the

approximate time period that the investigation is expected to take. AWI will keep these people informed of the general progress of the investigation.

- All participants in the grievance process are required to keep the discussions and information of the process and/or investigations relating to the grievance confidential. However, it is important to note that AWI cannot guarantee the anonymity of those involved. AWI has obligations to all parties involved in a complaint. AWI may have to provide an alleged perpetrator or other party to a grievance with details which are necessary to enable them to provide an informed response or explanation.
- To the extent a Worker wishes to make what he/she considers to be an "informal" complaint, please be advised that AWI may nonetheless investigate the facts alleged in such "informal" complaint.
- In the case where a complaint is made against a member of the AWI Board, this will be investigated, where appropriate, by an external and independent party.

What happens if Workers are found to have engaged in unlawful or improper behaviour?

- Where a determination is made that a grievance is substantiated, AWI will consider whether any, and if so what, disciplinary action is appropriate. Workers who are found to have engaged in unlawful or improper behaviour will be subject to disciplinary action, up to and including termination of employment or engagement.
- Some examples of the types of action that may be considered in response to a substantiated grievance include:
 - (a) an apology (verbal or written);
 - (b) an undertaking that the behaviour will cease;
 - (c) a formal warning;
 - (d) transfer or demotion;
 - (e) suspension (without pay);
 - (f) termination of employment or engagement; and/or
 - (g) awareness-raising sessions and training.
- In determining the appropriate action to be taken, circumstances which may be taken into account include:
 - (a) the seriousness of the conduct;
 - (b) whether those involved knew what they were doing and intended to do it;
 - (c) whether there are any mitigating circumstances; and
 - (d) any other relevant matters.

- If a grievance is unsubstantiated or there is insufficient evidence, the complainant and person against who the grievance is made will be informed of the outcome. Parties will be expected to move on from the grievance in a mutually respectful manner.

12. Complaints made in Bad Faith

- Workers must not make any complaints under this Policy in bad faith. This includes circumstances where the Worker lodging the complaint is aware that the complaint is not truthful and is acting maliciously. Any such complainants will not be afforded the protections set out in this Policy, and the Worker may be subject to disciplinary action (which may include termination of employment or engagement).

13. Victimisation

- AWI will not tolerate any behaviour whereby a Worker victimises another person because they are involved in a complaint about alleged unlawful discrimination, harassment, bullying or other inappropriate behaviour.
- It is unlawful to victimise another person because:
 - (a) he or she has made a complaint;
 - (b) he or she is about to make such a complaint, or
 - (c) he or she is otherwise involved in a complaint, for example, as a witness in an investigation.
- Victimisation may include, but is not limited to, the following types of behaviour:
 - (a) treating somebody detrimentally;
 - (b) creating a hostile working place for the person concerned;
 - (c) verbal abuse and derogatory comments;
 - (d) intimidation;
 - (e) withholding opportunities;
 - (f) any form of retaliation;
 - (g) terminating the employment of an individual or refusing them a promotion; and
 - (h) threatening a person.
- If you feel that you are being victimised, you should promptly report the incident in accordance with "Raising Grievances" section of this Policy.
- If a Worker is found to have engaged in victimisation, he or she will be subject to disciplinary action, up to and including termination of employment or engagement.

14. Questions or Concerns

If you have any questions or concerns regarding this Policy please contact the People & Culture Team.



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