

1. Our Commitment

Zenith RBA Pty Ltd is committed to fostering a workplace that is safe, respectful, inclusive, and free from all forms of discrimination, harassment, and psychosocial harm.

All employees have the right to work in an environment that promotes dignity, fairness, and equality. This policy is aligned with Australian legislation and reinforces our commitment to creating a professional workplace culture that supports positive working relationships and psychological well-being.

This policy has been developed in compliance with the following legislation:

- Sex Discrimination Act 1984 (Cth)
- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Acts (Nationally) – including provisions for psychosocial hazards
- Any applicable state or territory anti-discrimination legislation

Discrimination and sexual harassment are unlawful and strictly prohibited. Zenith RBA Pty Ltd has a positive duty to prevent these behaviours and to actively eliminate or minimise any risks associated with them in the workplace.

2. Responsibilities of All Employees

All employees must:

- Treat others with respect, courtesy, and fairness at all times.
- Refrain from engaging in any behaviour that constitutes discrimination, harassment, vilification, victimisation, or bullying.
- Report any observed or experienced incidents of inappropriate conduct.
- Contribute to a workplace culture that supports inclusion, psychological safety, and wellbeing.

3. Responsibilities of Managers and Supervisors

Managers and supervisors play a critical role in maintaining a workplace free of harassment and discrimination. They are responsible for:

1. Leading by example through inclusive, respectful, and fair behaviour.
2. Promoting awareness of this policy and relevant workplace laws.
3. Identifying, assessing, and managing psychosocial hazards, including sexual harassment, under WHS legislation.
4. Responding to reports or observations of misconduct in a timely and appropriate manner.
5. Providing support to affected individuals and referring matters to Human Resources or senior leadership where needed.
6. Ensuring no employee is disadvantaged or retaliated against for raising concerns.

All managers and supervisors must be familiar with and comply with their legal obligations under anti-discrimination and WHS laws.

4. Breaches and Consequences

Any breach of this policy or relevant legislation may result in disciplinary action, including but not limited to:

- Counselling or performance management
- Formal warning(s)
- Suspension or termination of employment
- Notification to relevant regulatory authorities

Serious breaches may constitute unlawful conduct and could lead to civil or criminal liability for individuals and the organisation.

5. What Constitutes Discrimination and Sexual Harassment?**Discrimination**

Discrimination occurs when someone is treated less favourably because of a **protected attribute**, including:

- Sex, sexual orientation, gender identity, intersex status
- Race, colour, descent, ethnic origin, national origin
- Disability (physical, mental, intellectual)
- Age
- Marital or relationship status
- Pregnancy or potential pregnancy
- Religion
- Political opinion
- Family or carer responsibilities
- Industrial activity

Discrimination can be direct or indirect and is unlawful under both federal and state legislation.

Sexual Harassment

Sexual harassment is **any unwelcome conduct of a sexual nature** that makes a person feel offended, humiliated, or intimidated, and where a reasonable person would anticipate that reaction in the circumstances.

Sexual harassment includes (but is not limited to):

Verbal:

- Sexually explicit jokes or comments
- Repeated unwelcome invitations or advances
- Inappropriate sexual remarks

Non-Verbal/Visual:

- Displaying or circulating sexual images or messages
- Leering or suggestive gestures
- Sexualised emojis or symbols in communication

Physical:

- Unwelcome touching, hugging, patting, or brushing up
- Blocking someone's movement or space
- Giving unsolicited massages

Digital/Online:

- Sending sexually suggestive or explicit content via email, chat, or social media
- Making inappropriate comments during video calls or in shared digital spaces

Quid Pro Quo Harassment:

- Offering or implying benefits (e.g., promotions, hours) in exchange for sexual favours
- Threatening negative consequences for rejecting advances

Sexual harassment can happen in person, in writing, online, or via any communication platform. It can occur between colleagues, managers, contractors, customers, or visitors.

6. Psychosocial Hazards and Workplace Health and Safety

Sexual harassment and discrimination are recognised as psychosocial hazards under the Work Health and Safety Regulations. Employers have a positive duty to identify, eliminate, or minimise risks to psychological health and safety.

Zenith RBA Pty Ltd is committed to:

- Conducting regular risk assessments to identify psychosocial hazards
 - Consulting with employees and health and safety representatives
 - Implementing control measures to manage risk (e.g., policy training, reporting systems, leadership development)
 - Promoting a workplace culture that supports respectful communication, inclusion, and mental wellbeing
 - Monitoring complaints, workplace incidents, and feedback to continuously improve
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7. Reporting and Support

Employees who experience or witness sexual harassment, discrimination, or any form of inappropriate behaviour are strongly encouraged to report the matter as soon as possible.

Reports can be made to:

- Your immediate manager or supervisor
- Human Resources
- The General Manager or CEO

Complaints will be:

- Taken seriously and treated confidentially
- Managed in a trauma-informed and procedurally fair manner
- Investigated promptly and objectively
- Addressed without victimisation or retaliation

Support will be offered to affected employees, including access to counselling and reasonable workplace adjustments as needed.

8. Final Note

Zenith RBA Pty Ltd is committed to upholding the legal and moral obligation to maintain a workplace that is free from discrimination, harassment, and psychosocial harm. We will continue to:

- Foster respectful relationships and communication
- Promote equality, safety, and mental wellbeing
- Hold individuals accountable for inappropriate behaviour
- Ensure our policies and practices evolve with best practice and legal obligations

This is a shared responsibility, and every employee plays a role in helping create a safe, respectful, and inclusive environment.



Greg McDonnell
Group Managing Director

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Next Review: 01/07/2028