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| Policy Name: | Diversity, Inclusion and Anti-Discrimination Policy | | |
| Policy Number: | 3.03 | Date: | February 2023 |

POLICY STATEMENT:

JC Steele is a discrimination free workplace. JC Steele complies with the Equal Opportunity Act 2010 (the Act) and expects all of its employees to act in accordance with the Act. JC Steele will not tolerate any type of discrimination in the workplace. In accordance with all federal, state and local laws, we will recruit, hire, remunerate, train and develop, evaluate, discipline, place, promote, roster and terminate the employment of employees equally and fairly. We will also provide a workplace which is free from discrimination, bullying and harassment.

It is the policy of JC Steele that all employees are aware of what constitutes discrimination and 'protected attributes' under the law.

JC Steele actively encourages diversity of all types: race, religion, age, sex, sexual orientation or gender identification or expression, physical attributes, disability and political persuasion, among others, and creates a safe, inclusive and accepting environment.

JC Steele has established this policy as it recognises the need to be proactive in ensuring discrimination does not occur in the workplace, as well as ensuring that diversity, inclusion and tolerance are hallmarks of our culture. All employees of JC Steele are expected to comply with this policy. Engaging in any type of discriminatory behaviour is not only a breach of JC Steele policy but is also unlawful.

PROCEDURES:

- a. Under the Equal Opportunity Act 2010 it is against the law to discriminate against a person on the basis of the following protected attributes:
 - Age
 - Carer status
 - Disability
 - Employment Activity
 - Gender identification or expression
 - Industrial action
 - Lawful sexual activity
 - Marital status
 - Parental status
 - Physical features
 - Political belief or activity
 - Pregnancy
 - Breastfeeding
 - Race (including colour, nationality, ethnicity and ethnic origin)

- Religious belief or activity
 - Sex
 - Gender Identity
 - Intersex status
 - Sexual orientation or gender identification or expression
 - Personal association with someone who has, or is assumed to have, any of these personal characteristics.
- b. Discrimination is unfavorable treatment of a person due to one or more of their personal characteristics. Discrimination may take the form of direct discrimination and/or indirect discrimination, whereby:
- **Direct discrimination** is when a person treats or proposes to treat a person with a protected personal attribute unfavorably because of that personal attribute.
 - **Indirect discrimination** is also against the law and refers to situations where treating everyone the same is unfair. This occurs where an unreasonable requirement, condition or practice that purports to treat everyone the same ends up actually disadvantaging someone with a personal attribute protected by the law.
- c. Sexual harassment is also against the law. Engaging in conversations or activities that make somebody feel uncomfortable or offended, especially with regards to sex, sexual orientation or gender identification or expression, or intersex status can be considered sexual harassment and also be discriminatory. JC Steele does not permit any type of sexual harassment or discrimination in the workplace – refer to the Sexual Harassment and Sex Discrimination Policy for further details.
- d. All employees are encouraged to be mindful of conversations that may offend or upset someone based on any of the protected attributes, including telling inappropriate or discriminatory jokes.
- e. Functions that occur outside of the workplace, but as an extension of the workplace (even when not organised by JC Steele), are covered by this policy as well as the JC Steele Bullying and Harassment Policy. This includes employees attending drinks or dinner outside work times.
- f. If you feel that you have been the victim of discrimination you should advise your manager, in line with the JC Steele Grievance Procedure Policy. If you are unable for any reason, to approach your manager, then you should speak with the Managing Director or HR Representative.
- g. If JC Steele fails to take appropriate action or rectify the situation, you can seek advice from the Victorian Equal Opportunity and Human Rights Commission on 1300 292 153 or email enquiries@veohrc.vic.gov.au.
- h. JC Steele requires all employees to contribute to an environment that is not only free from discrimination of any sort, it actively embraces and welcomes diversity in all its forms and actively seeks to be inclusive and to promote understanding and tolerance.