

# FAIR TREATMENT & EQUAL OPPORTUNITY POLICY

## OVERVIEW

Mantr Group is committed to the prevention of any form of discrimination, sexual harassment or victimisation at the workplace or at any place where work-related activities are performed, including at social functions. Mantr Group Management consider these to be unacceptable forms of behaviour and will not tolerate such behaviour under any circumstances.

This policy applies to all workers in their relationships with each other, with applicants for employment with Mantr Group and with persons who have dealings with Mantr Group.

All individuals have a right to be treated equitably and without harassment occurring in the workplace. All employees have the responsibility to respect the rights of fellow workers, by not taking part in any action that may constitute harassment and by supporting and promoting the achievement of equal opportunity.

## EQUAL EMPLOYMENT OPPORTUNITY AND DISCRIMINATION

This policy reflects the spirit and intent of federal and state affirmative action and anti-discrimination legislation in Australia. Mantr Group believes that people are more productive in an environment that is free from discrimination.

Mantr Group is an equal opportunity employer. We are committed to ensuring that factors relating to a person's ability to perform his or her responsibilities, and to develop in his or her employment, are paramount to decisions about an individual's work.

Equal opportunities mean ensuring that employment policies and practices are based on, and operate according to, the principle of merit. Mantr Group is therefore committed to ensuring that its employment practices are free from any unlawful discrimination based on:

- Race/ethnicity
- Gender
- National origin
- Marital status
- Sexual preference/lawful sexual activity

- Age
- Disability/impairment, including infectious disease
- Industrial/employment activity
- Physical features
- Pregnancy
- Family responsibilities
- Religious beliefs
- Political conviction
- Breastfeeding
- Gender identity

Mantr Group is committed to ensuring that its employment practices are free from any unlawful discrimination based on a person's association (including as a relative) with someone who has one of the characteristics listed above.

Discrimination can take many forms, some of which are direct or open. Others may be indirect or hidden. Direct discrimination occurs when a person is treated less favourably than another, simply because of a personal characteristic or status unrelated to job performance, such as gender, race, sexuality, marital status (as listed above).

Indirect discrimination occurs when a policy or requirement which at first glance seems fair, in fact operates to the detriment of a particular group of people because of a characteristic of that group, such as age, race, family circumstances or gender (as listed above).

## **WORKPLACE HARASSMENT**

Mantr Group are committed to providing an environment that is free from sexual harassment and from any other harassment on the discriminatory grounds listed above.

## **DEFINITIONS**

Unlawful harassment includes some things that might not be perceived to be harassment. For example, the creation of a work environment that is generally hostile to a person or group of people with particular characteristics. Sexual harassment,

discriminatory harassment and victimisation due to making a complaint are unlawful and amount to discrimination under federal and state anti-discrimination law.

**Sexual harassment** is unwelcome conduct of a sexual nature, including unwelcome sexual advances, which are likely to make a person feel offended, humiliated or intimidated. It does not require an intention to harass and does not require the recipient to ask for the behaviour to stop. It is not mutually accepted behaviour. For example, harassment does not usually include genuine compliments or mutually acceptable physical contact.

**Discriminatory harassment** is a recognised form of discrimination which occurs when a person is harassed because of characteristics such as disability, gender, race and age (or any of the other grounds outlined above).

**Victimisation** occurs when a person is treated unfairly or less favourably because of making or intending to make a complaint of sexual harassment or discrimination.

Some examples of behaviour which can be sexual harassment or discriminatory harassment include:

- Acting towards, or speaking to a person in a manner which threatens them;
- Making jokes, suggestive comments or offensive gestures related to a person's race, colour, ethnic origin, disability, gender or sexual characteristics;
- Distribution or display of material (including through e-mail) which may be offensive, such as sexually explicit posters or pictures, racist or sexist jokes or cartoons;
- Persistent questions about a person's private life;
- Personal comments about appearance, size, clothing;
- Demands for sexual favours, either directly or by implication;
- Unwanted and deliberate physical contact; and
- Indecent assault, rape and other criminal offences.

## **GRIEVANCE PROCEDURE**

Mantr Group are required to ensure that all employees are treated fairly and equitably and are not subject to discrimination, victimisation or harassment. Any concerns can be discussed privately and confidentially with management.

All employees must appreciate that raising an allegation of harassment, discrimination or victimisation against another person in the workplace is a serious

matter. Regardless of whether the complaint is substantiated, the act of raising the complaint will have significant and often permanent consequences both personally and professionally for the other party.

Mantr Group will not tolerate abuse of the processes outlined in this policy or the making of vexatious complaints.

Use of the Grievance Procedure to deal with issues of harassment, victimisation or discrimination is purely voluntary and not mandatory. However, if an employee decides not to raise the issue in the manner outlined in this policy or by seeking external help, the employer expects that this will be the end of the matter. In particular, the employee must not seek to progress the issue informally e.g. allowing the matter to be the subject of innuendo or gossip, harassing the other party, etc. Breach of this aspect of the policy may attract disciplinary sanctions.

All staff are required to treat any complaints under this policy confidentially and discuss a complaint only to assist its resolution. A serious form of victimisation can occur when co-workers discuss and take sides on complaints about potentially discriminatory or harassing behaviour. Staff are encouraged to come forward to obtain assistance from the nominated people to ensure any inappropriate conduct that exists does not continue.

## **COMPLAINT HANDLING**

Mantr Group has established confidential procedures for handling complaints. These procedures are based on the principle that the rights and privacy of both parties to a complaint should be safeguarded. Mantr Group believes it is important that any complaint is dealt with promptly, professionally and with sensitivity.

If you have a complaint or a harassment problem you can speak confidentially to one of the management team.

The relevant agencies and the Employer encourage internal resolution of complaints where possible. Our internal complaint handling guidelines are as follows:

**1** If you feel comfortable doing so, you should first advise the other person, verbally or in writing, in a direct or firm manner that their behaviour is unacceptable. This may be enough to stop the unwelcome behaviour. You can speak with a Contact Officer who can assist with this step or suggest other options.

It is suggested that you keep diary notes of all incidents with names, dates, witnesses and any response you make in respect to the incidents.

**2** Speak with a Contact Officer about the incident(s). The Contact Officer will discuss options for stopping the harassment. This may involve nominating one of the internal

Conciliators who will first discuss and clarify the allegations with the relevant parties and then attempt to find a suitable and appropriate resolution.

**3** If either party is unhappy with the progress of the complaint or the resolution, he/she can request the Employer to appoint an independent mediator. If the complainant is dissatisfied with the progress or resolution he/she can lodge a complaint with the relevant agencies as listed above. Both parties will be afforded natural justice. This means that:

- Complaints Will Be Investigated Promptly;
- The Allegations Will Be Put To The Alleged Perpetrator;
- Each Party Will Be Given The Opportunity To Express Their Version Of Events; and
- The Alleged Perpetrator Will Be Treated As Innocent Unless The Allegations are proven. All file notes relating to the complaint will be kept in specially provided locked files. Only the management member dealing with particular complaints will have access to these files. Employees involved in harassment or discrimination complaints may also be offered professional support services such as counselling or medical advice, as appropriate.

These guidelines may not be practical for every case, and you or the Contact Officer may suggest more applicable resolution procedures

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**Signed: Pawan Mishra – COO**

02/01/2025

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**Date**