



ANTI-BULLYING AND HARASSMENT POLICY

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- b) using the documents or data for any purpose not agreed to in writing by i24s.

1 PURPOSE

i24s Group Pty Ltd (“i24s”) (“the Group”) (ABN 74 650 861 402), is a 100 per cent owned and operated Aboriginal business. The Group is a leading provider of talent pipeline/workforce solutions, industrial equipment hire and goods, and outreach and advocacy services, for the Mining, Resources, Energy, Infrastructure and Property sectors.

i24s is committed to a workplace where everyone is treated with dignity and respect. Bullying, harassment, sexual harassment, discrimination and victimisation are prohibited.

The purpose of this **Anti-Bullying and Harassment Policy** (“Policy”) is to establish a workplace in which all individuals are supported, respected, and connected.

This Policy sets out:

- expected standards of behaviour;
- how to report concerns;
- how i24s will respond;
- available supports; and
- how we manage related psychosocial risks under our work health and safety duties.

2 INTRODUCTION

As a Group that values human rights, we honour the unique skills, competencies, and insights of people that represent the communities we serve. In addition to this Policy, our Code of Conduct sets out a common framework for how we expect our people to behave and do the right thing.

By employing people from diverse backgrounds and enabling everyone to bring their differences, skills, experiences and perspectives to work, i24s is well equipped to deliver valuable solutions to our clients.

3 SCOPE

This Policy applies to all Group employees, officers and contractors. When we say “we”, “our” or “us” we are referring to everyone at the Group.

Where appropriate, we will also encourage our clients, joint venture partners, stakeholders and suppliers, including non-i24s employees working for, or representing, i24s on project sites, and community stakeholders to respect this Policy.

4 DEFINITIONS

Bullying

Repeated, unreasonable behaviour directed at a worker or group that creates a risk to health and safety. Unreasonable behaviour is that which a reasonable person would consider victimising, humiliating, intimidating or threatening.

Reasonable Management Action (not bullying)

Reasonable actions carried out in a reasonable way, such as lawful performance management, setting KPIs/rosters, giving fair feedback, making disciplinary decisions after a fair process, allocating work, and managing work health and safety.

Harassment

Unwelcome conduct (e.g. verbal, physical or written/online) that demeans, offends, humiliates or intimidates a person.

Sexual Harassment

Any unwelcome conduct of a sexual nature where a reasonable person would anticipate the possibility that the person harassed would feel offended, humiliated or intimidated. It can be a single incident and includes sex based harassment (e.g. hostile, demeaning conduct based on sex or gender).

Discrimination

Adverse treatment because of a protected attribute (e.g. race, colour, sex, sexual orientation, gender identity, intersex status, pregnancy, family/carer responsibilities, age, disability, religion, political belief, national extraction, social origin, marital/relationship status).

Victimisation

Treating someone unfavourably because they made, intended to make, or helped with a complaint or inquiry.

Psychosocial Hazard

Anything in the design or management of work that could cause psychological or physical harm (e.g. high job demands, low control, remote work isolation, fatigue, poor support, exposure to aggression or violence, bullying/harassment).

5 POLICY

5.1 STANDARDS OF BEHAVIOUR

All workers must:

- act with courtesy, professionalism and cultural respect (including when working on/with Country);
- follow the Code of Conduct and client site rules;
- use appropriate language and avoid offensive jokes, slurs or unwanted remarks about someone's personal characteristics;
- never engage in bullying, harassment, sexual harassment or discrimination;
- use social and digital platforms responsibly (no doxxing, insults, sexualised content, or gossip about colleagues/clients);
- report concerns promptly and keep matters confidential; and
- cooperate with i24s investigations and corrective actions.

5.2 CONTEXTUAL EXAMPLES (NOT EXHAUSTIVE)

- **Bullying:** Repeated swearing at a cleaner/security officer; spreading rumours; excluding someone from information; repeatedly assigning demeaning tasks; aggressive texts in a team chat; threatening to cut shifts as payback.
- **Not Bullying (reasonable management action):** A supervisor directing a guard to follow the patrol route; performance counselling with specific examples; reallocating a shift for operational reasons, communicated respectfully.
- **Harassment:** Racial or sexist jokes; mocking someone's accent or disability; displaying offensive materials in the crib room; repeated comments about personal appearance.
- **Sexual Harassment:** Unwelcome touching; sexual comments or innuendo; sending sexual images/links; asking intrusive questions about private life; pressuring someone for dates or sexual favours; creating a hostile environment through sexualised banter.

- **Victimisation:** Cutting hours, reassigning to less favourable shifts, or ostracising a worker because they complained or were a witness.
- **Third Party Conduct:** disrespectful behaviour by clients or members of the public toward i24s staff must be reported; i24s will engage the client, adjust the work design, or withdraw our worker if required.

5.3 RESOLUTION MANAGEMENT

Triage and Immediate Safety

Separate parties if needed, adjust rosters, implement contact limitations, and offer support. Record as a psychosocial hazard/incident in the HSE system.

Preliminary Assessment

Determine if informal resolution is suitable or if a formal investigation is required. Provide the respondent with details of the allegations, relevant evidence and reasonable time to respond. Offer a support person to all parties.

Fair Process

- Appoint an impartial manager or investigator.
- Collect evidence (i.e. interviews, documents, CCTV/site logs where lawful).
- Keep parties informed of key steps and expected timeframes.

Findings and Outcomes

Decide on the balance of probabilities. Outcomes may include: no breach but management action, coaching/mediation, written warning, final warning termination for serious misconduct, removal from site, changes to supervision/work design, and client engagement for third party issues.

Review and Risk Controls

- Identify contributing hazards (e.g. understaffing, poorly defined roles, isolated work, poor amenities).
- Implement controls (staffing levels, leadership presence, comms channels, PPE/duress, fatigue management, cultural awareness).
- Monitor effectiveness.

Closure and Records

Confirm decisions in writing to relevant parties, respecting privacy. Retain records securely and in line with the Privacy Policy and legal requirements.

Support and Adjustments

- **Support:** Refer to the i24s Employee Assistance Program and confidential services provided by third parties.
- **Work Adjustments:** temporary or ongoing changes to shifts, reporting lines, locations, duties or buddying.
- **Leave Options:** personal/carer's leave, compassionate leave, or other entitlements per awards/agreements and i24s policy.
- **Cultural Safety:** access to culturally appropriate support and escalation pathways.

5.4 CONFIDENTIALITY AND PRIVACY

We will protect confidentiality to the extent possible and lawful. Information is shared only with those who need it to manage risk, conduct the process or meet legal obligations. All records are stored securely.

5.5 TRAINING AND COMMUNICATION

- Included at induction and refreshed at least annually.
- Targeted modules for supervisors (i.e. early intervention, fair process, documentation).
- Toolbox talks for high-risk settings (i.e. FIFO/DIDO, night shifts, remote posts).
- Periodic campaigns on bystander action and respectful communications, including digital.

5.6 CONSULTATION

We consult workers and HSRs on psychosocial risks, proposed controls, and policy changes through team meetings, safety committees and anonymous feedback channels.

5.7 NON COMPLIANCE

Breaches of this Policy may lead to disciplinary action up to and including termination, removal from client sites, or cessation of contract. Certain behaviours (assault, threats, stalking) may be referred to Police.

5.8 MONITORING, MEASUREMENT AND REVIEW

Lead Indicators: Completion of training, supervisor check ins, consultation feedback, corrective actions closed on time.

Lag Indicators: Number and type of reports, investigation duration, substantiation rates, turnover/absenteeism in affected teams.

Audit: Annual work health and safety audit, and management review.

Review Triggers: Serious incident, trend increase, client request, or law/standard updates.

6 LEGISLATION AND STANDARDS

i24s complies with Australian and international legislation and requirements surrounding human rights, diversity, inclusion, equality, discrimination, bullying, harassment and equal opportunity. This includes various legal frameworks to help ensure people are not unfairly disadvantaged on account of traits such as race, ancestry, ethnicity, citizenship, creed, colour, age, physical features, sex, sexual orientation, lawful sexual activity, gender identity and expression, age, physical or mental disability, marital status, family responsibilities, pregnancy, breast feeding, carer responsibilities, religion, political opinion, industrial activity or trade union membership, affiliation, or military status.

Discrimination, bullying and sexual harassment are unacceptable at i24s and are unlawful under legislation including:

- Sex Discrimination Act 1984 (Cth);
- Racial Discrimination Act 1975 (Cth);
- Disability Discrimination Act 1992 (Cth);
- Age Discrimination Act 2004 (Cth); and
- Australian Human Rights Commission Act 1986 (Cth).

Employees who are found to have engaged in such conduct may be counselled, warned or disciplined.

Severe or repeated breaches can lead to formal disciplinary action including termination of employment. Employees can be held personally liable for certain breaches of discrimination law, and i24s can also be liable for our employees' conduct.

7 GOVERNANCE

The governance of this Policy is overseen by the Group's Officer and Chief Executive Officer.

For further information about this Policy, please contact i24s on +61 8 9209 2090 or admin@i24s.com.au

Angela Kickett

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