

Purpose

Greater Western Water (**GWW**) is committed to providing a safe, inclusive and respectful workplace free from unlawful discrimination, harassment, bullying and victimisation. Further, GWW is committed to providing a productive and positive work environment for all employees, visitors, contingents/contractors and consultants. This commitment is based on the need to work together to prevent and eliminate all forms of unlawful discrimination, harassment (including sexual harassment and sex-based harassment), bullying and victimisation.

GWW values diversity, creativity, and the unique perspectives that each person contributes. By fostering a culture of respect and openness, we empower our employees to express their true identities, driving innovation and collaboration for our collective success.

This policy also supports GWW's aim to facilitate an inclusive environment which embraces differences in gender, culture, language, sexual orientation, gender identification, age, qualifications, experiences, a person's disability, and difference in approach & opinions.

To the extent that the contents of this policy refer to obligations on GWW, they are guidelines for management or summaries of applicable legislative requirements only and are not contractual terms, conditions, or representations on which a staff member may rely.

Objectives

GWW will endeavour to ensure that in the application of all company policies, practices and procedures, no unlawful discrimination takes place. Further, GWW will ensure that its company policies, practices and procedures, so far as reasonably practicable, actively promote equality. We aim to ensure that when employment decisions are made, they are based on individual merit, not on irrelevant attributes or characteristics that an individual may possess.

GWW will also endeavour to ensure that no sexual, sex-based, racial, or other harassment, bullying or victimisation occurs in the workplace.

Safe, Inclusive and Respectful Workplace Policy

Further, GWW is committed to achieving the following Equal Employment Opportunity (**EEO**) objectives:

- To ensure everyone is treated fairly;
- To provide a safe, flexible, and respectful work environment for employees and customers free from all forms of unlawful discrimination, bullying and sexual harassment;
- To keep all policies and procedures consistent with EEO principles; and
- To ensure achievement of our objectives through our EEO initiatives, which includes training on EEO and related issues and covers the understanding of gender inequality, addressing sexual harassment and other unlawful behaviours, and fostering a respectful work environment.

In meeting our objectives for People Culture & Safety, Greater Western Water seeks to support the achievement of the People strategic objectives in our 2030 Strategy.

Scope

This policy applies to:

- Board Members;
- All GWW employees, "in house" contingents/contractors and consultants including those engaged through an employment agency;
- job candidates;
- student placements, cadets, trainees and volunteers; and
- Delivery Partners (and their sub-contractors) engaged by GWW.

This policy is not limited to the workplace or work hours but extends to all places and functions that are work related or which impact the working relationship. For example, work or customer/supplier meetings, work lunches, conferences, work organised social functions, and external functions. Staff members should comply with this policy at all work-related functions. This policy also applies:

- to your visits to other workplaces in connection with work;
- to your interactions with other staff over the internet (e.g. via social media), including outside of working hours;
- in all aspects of employment, including but not limited to recruitment, and selection,

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Doc ID: POL-46

This document is uncontrolled when printed or saved locally

Page 2 of 9

Safe, Inclusive and Respectful Workplace Policy

conditions and benefits, training and promotion, task allocation, shifts, hours, leave arrangements, workload, equipment and transport; and

- to your treatment of other employees, employees of clients/third parties and of other members of the public encountered in the course of your GWW duties.

This policy should also guide how GWW provides services to customers and how it interacts with other members of the community.

Roles and responsibilities

Greater Western Water's Responsibilities

GWW has a positive duty to take reasonable and proportionate measures to eliminate, as far as possible, conduct that includes:

- sexual harassment;
- harassment on the ground of sex (being unwelcome conduct based on the sex of the person, but not necessarily sexual in nature);
- discrimination on the ground of a person's sex (being differential treatment based on the sex of the person);
- conduct that subjects a person to a 'hostile working environment' (see below) on the ground of sex (being, conduct that results in an offensive, intimidating and humiliating environment for people of one sex, but not necessarily directed at a person); and
- acts of victimisation that relate to complaints, proceedings, assertions or allegations in relation to conduct above.

GWW recognises that the conduct referred to above has underlying drivers, such as gender inequality.

Sex discrimination, sexual harassment, sex-based harassment, conduct that subjects a person to a hostile working environment and victimisation are unlawful under the *Sex Discrimination Act 1984* (Cth) as well as anti-discrimination legislation operating in every State and Territory. Unless GWW has taken all reasonable steps to prevent an employee from committing such unlawful acts in connection with their employment, GWW will be vicariously liable for that conduct. We will not tolerate any form of sex discrimination, sexual harassment, sex-based harassment, conduct that subjects a person to a hostile working environment or victimisation in the workplace.

GWW aims to prevent bullying, unlawful discrimination, sexual harassment and victimisation in the workplace through promotion of this policy. GWW aims to achieve

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Page 3 of 9

Safe, Inclusive and Respectful Workplace Policy

this by:

- creating a working environment which is free from bullying, unlawful discrimination, sexual harassment and victimisation and where all staff members are treated with dignity, courtesy and respect;
- embedding inclusivity into recruitment, promotion, and professional development processes;
- eliminating sexual harassment and conduct that amounts to subjecting a person to a hostile work environment on the grounds of sex;
- implementing training and awareness raising programs to ensure that all staff members know their rights and responsibilities, including our Safe, Inclusive and Respectful Workplace Program;
- providing an effective procedure for complaints based on the principles of fairness;
- treating all complaints in a sensitive, fair, timely and confidential manner, subject to the rights of others involved, and in accordance with the GWW Discrimination, Bullying and Harassment Guidelines;
- providing protection from any victimisation or reprisals;
- encouraging the reporting of behaviour which breaches discrimination and harassment policies; and
- promoting appropriate standards of conduct at all times.

GWW will ensure that this policy is readily accessible and will take all reasonable steps to ensure compliance with the policy through its Safe, Inclusive and Respectful Workplace Programs.

In addition to the above, it is the responsibility of the Board and Managing Director to ensure that:

Safe, Inclusive and Respectful Workplace Policy

- All People Leaders understand and are committed to the principles and legislation relating to GWW's Safe, Inclusive and Respectful Workplace Policy, program and applying it in the workplace;
- Employment decisions relating to appointment, promotion and career development are determined according to individual merit and the individual's inherent ability to carry out the job;
- The organisation has a workplace culture that strives for and promotes substantive equality; and
- They set an example through their own behaviour.

People Leader Responsibilities

All GWW People Leaders are responsible for taking all reasonable steps to prevent and address all forms of unlawful discrimination, harassment (including sex-based and sexual harassment), bullying and victimisation consistent with this policy. Our people leaders have a specific responsibility to promote an inclusive and respectful environment by addressing any concerns promptly and appropriately.

Our people leaders are responsible for driving cultural change within the organization. GWW has established clear leadership accountability for maintaining a harassment-free workplace and ensuring the implementation of its policies.

People Leaders must also:

- Model appropriate standards of behaviour;
- Take steps to educate and make staff aware of their obligations under this policy;
- Intervene quickly and appropriately when they become aware of inappropriate behaviour;
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard;
- Help resolve complaints informally;
- Refer formal complaints about breaches of this policy to People, Culture & Safety for investigation;

Safe, Inclusive and Respectful Workplace Policy

- Ensure staff who raise an issue or make a complaint are not victimised;
- Ensure that recruitment decisions are based on merit and that no discriminatory requests for information are made; and
- Seriously consider and consult on requests for flexible work arrangements.

Employee Rights and Responsibilities

All GWW employees are responsible for adhering to this policy, including reporting any potential breach of this policy to your People Leader or a member of the People, Culture and Safety Team.

You are entitled to:

- Recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics;
- A workplace free from unlawful discrimination, bullying and sexual harassment;
- To raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised; and
- Reasonable flexibility in working arrangements, especially where needed to accommodate family responsibilities, disability, religious beliefs, or culture.

You must:

- Report any potential breach of this policy;
- Not encourage, or camouflage any form of bullying, unlawful discrimination, sexual harassment, or victimisation;
- Follow the standards of behaviour outlined in this policy;
- Treat everyone with dignity, courtesy and respect;
- Understand the process of how to make a complaint; and
- Respect and uphold the confidentiality of the complaint resolution process and procedures.

Unacceptable Workplace Conduct

Bullying, unlawful discrimination, sexual harassment or victimisation are unacceptable at GWW and are unlawful under the following Federal and State legislation:

- Sex Discrimination Act 1984 (Cth)

Safe, Inclusive and Respectful Workplace Policy

- Racial Discrimination Act 1975 (Cth)
- Disability Discrimination Act 1992 (Cth)
- Age Discrimination Act 2004 (Cth)
- Australian Human Rights Commission Act 1986 (Cth).
- Equal Opportunity Act 2010 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Racial and Religious Tolerance Act 2001 (Vic)
- Fair Work Act 2009 (Cth)
- Occupational Health and Safety Act 2004 (Vic)

GWW is committed to ensuring that its approach to resolution of any complaint or allegation under this policy is person-centred and trauma-informed: the safety and wellbeing of a staff member disclosing or reporting relevant unlawful conduct under this policy is a priority for GWW.

If any staff member engages in bullying, unlawful discrimination, sexual harassment or victimisation against a job applicant, customer, supplier, employee or any other workplace participant, or other person with whom they come into contact through work, that employee will face disciplinary action, which may include dismissal.

Where contractors, contingent workers, volunteers, students or other external parties are found to have breached this policy, the association with GWW will be ceased following the relevant provisions of the contractual requirements.

False or vexatious allegations of bullying, unlawful discrimination, sexual harassment, or victimisation will also not be tolerated and if found to have occurred, will result in disciplinary action against the person making the false or vexatious complaint, up to and including dismissal.

Further Information and Support

Further information on bullying can be obtained by visiting the website of the Fair Work Commission or WorkSafe Victoria.

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Doc ID: POL-46

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Page 7 of 9

Safe, Inclusive and Respectful Workplace Policy

Further information on unlawful discrimination and harassment can be obtained by visiting the website of Fair Work Commission, the Australian Human Rights Commission, or the Victorian Equal Opportunity and Human Rights Commission.

Staff who have experienced conduct which amounts to criminal conduct, such as sexual assault, can contact the Police for further assistance.

Support is available to anyone who witnesses or experiences unacceptable conduct as described in this policy. Employees may access GWW's Employee Assistance Program on 1300 OUR EAP (1300 687 327). The People, Culture and Safety Team is also available to facilitate support.

Responsibility, Review and Feedback

GWW regularly reviews its policies, procedures, and workplace culture to ensure compliance with applicable laws and to identify any potential gaps in prevention or support mechanisms.

References and related documents

VPSC Code of Conduct

Talent Acquisition and Selection Policy Diversity and Inclusion Policy Accessibility Policy

Family Violence Policy

Dispute and Grievance Procedure

EEO Discrimination Bullying and Harassment Guidelines

Relevant Enterprise Agreement

Review Process

The policy will be reviewed biennially

Approved by the Board March 2025

Next due for review by the Board in March 2027

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Page 8 of 9

Version control table

Version No.	Doc Owner	Change / Update	Date
4.0	Workforce Integration Partner	Update to reflect outcomes of breach for non-employees.	April 2021
4.1	Manager HR Services and Systems	Change in title Safe, Inclusive and Respectful Workplace Policy Updates to reflect changes to legislation	Jan 2023
4.2	Head of People Services	Updates to reflect changes to legislation and internal policies	Feb 2025