

It is the policy of GCM Contractors Ltd. to prohibit any form of harassment in each company workplace. The Company specifically prohibits any form of harassment by or toward employees, contractors, suppliers, or customers.

Objectives of the Policy

- provide a work environment that fosters mutual employee respect and working relationships free of harassment
- To ensure that all staff understand their responsibilities to avoid conduct and behaviour that constitutes bullying or harassment of other staff.
- To ensure that managers and supervisors understand their responsibilities to take measures to prevent bullying and harassment from staff or others taking place and to take steps to deal with alleged bullying and harassment, including, where necessary, swift and effective disciplinary action.
- To provide staff with both advice on how to deal with bullying and harassment and a procedure by which they can seek a resolution.
- To ensure that all parties are treated fairly and equitably and, whenever possible, to seek a constructive resolution mutually acceptable to both parties.

Harassment will not be tolerated. Forms of harassment include, but are not limited to:

- Harassment based on age
- Bullying
- Harassment based on disability
- Racial harassment
- Harassment based on religious or political conviction
- Sexual harassment
- Harassment based on sexuality or gender orientation

Definitions

In this policy:

- **discrimination** means unfair or unjust treatment of or decisions affecting an individual because of their sex, race, age, marital status, transgender status, carer’s responsibilities, disability, age, union membership, or other personal activities covered by the *NSW Anti-Discrimination Act 1977*.
- **harassment** means verbal or physical conduct which, because of its severity and/or persistence, is likely to create a hostile or intimidating environment which may detrimentally affect an individual's employment or education. Harassment is defined by reference to the nature and consequences of the behaviour, not the intent of the initiator (NSW Anti-Discrimination Act 1977).

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- **sexual harassment** means unwelcome sexual advances, requests for sexual contact and verbal or physical conduct of a sexual nature when submission to, or rejection of, such advances, requests or conduct is explicitly or implicitly a term or condition affecting employment or education decisions; and/or when such advances, requests or conduct have a detrimental effect on an individual's work or study environment (*Sex Discrimination Act 1984*).
- **bullying and workplace violence** means any on-going anti-social behaviour that offends, degrades or humiliates a person, and has the potential to create a risk to health, safety and wellbeing. Bullying and workplace violence refer to coercive, unethical activities that create an environment of fear.

All employees, including supervisors and managers, will be subject to disciplinary action up to and including termination for any act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their supervisors, to higher management, or their designated Human Resources Department contacts. All complaints will be promptly and thoroughly investigated.

In order to ensure that the policy is adhered to, the GCM Contractors Ltd. undertakes to:

- Publicise the Policy throughout the Company
- Provide specialist training for Managers/Supervisors to raise their awareness and to deal with harassment issues
- Address bullying and harassment issues in relevant staff training programmes
- Treat any complaint of harassment promptly, sensitively and thoroughly
- Protect confidentiality as far as possible
- Monitor the implementation of the policy and review it on an ongoing basis to ensure that it continues to be effective.



Gary McLaughlin
Director of GCM Contractors Ltd.

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