
Equal Opportunity Policy

1 Introduction

We are committed to conduct our business and activities in a sustainable and ethical manner and comply with relevant legal and regulatory requirements. This policy applies to all Wileo employees. All persons are to act in accordance with the principles set down in this policy.

2 Purpose

The purpose of the Equal Opportunity Policy is to ensure the creation and maintenance of an environment in which Staff Members are treated with respect, dignity, fairness and which is free from all forms of discrimination and harassment. This policy is designed to ensure that Wileo complies with all its obligations under the relevant legislation.

3 Policy

3.1 Policy Statement

Wileo is committed to ensure that all aspects of the workplace are free from unlawful discrimination by:

- the selection and appointment of employees and volunteers for employment, promotion or advancement, training and development will be merit based;
- review of employment will be considered without unlawful discrimination and in accordance with requirements set out in relevant legislation, industrial awards or agreements;
- extend equal opportunity to all individuals without regard for race, religion, color, gender, creed, national origin, age, disability or handicap status;
- no employee will be subjected to any form of detriment on the basis of a personal attribute.

Wileo employees, contractors and consultants are bound by their contract to follow our Equal Opportunity Policy while performing their duty or representing Wileo.

3.2 Policy objectives

- 3.2.1 To eliminate, so far as is possible, discrimination against persons on the grounds of sex, marital status, pregnancy, family responsibility or family status, race, religious or political conviction, impairment, age or gender history in the areas of work, accommodation, education, the provision of goods, facilities and services and the activities of clubs;
- 3.2.2 To eliminate, so far as is possible, sexual harassment and racial harassment in the workplace, and in educational institutions not limited to unwelcome sexual advances or requests for sexual favors as a term or condition for employment; creating an intimidating, hostile or offensive working environment or atmosphere either by verbal actions, including calling employees by terms of endearment; using vulgar, kidding or demeaning language or sexual harassment and racial harassment related to accommodation;
- 3.2.3 To promote recognition and acceptance within the community of the equality of men and women; and
- 3.2.4 To promote recognition and acceptance with the community of the equality of persons of all races, regardless of their religious or political convictions, their impairments or ages.

3.3 Employment of Employees

- 3.3.1 Wileo is committed to and will apply the principles of equal employment opportunity in the selection of all employees, promotion or advancement, training and development opportunities;
- 3.3.2 Wileo will ensure that the selection criteria do not exclude disadvantaged groups from equitable consideration for positions;
- 3.3.3 Employment selection will be sensitive to the needs of applicants from disadvantaged groups, particularly language difficulties and cultural differences;
- 3.3.4 Applicants who have a disability will be assessed against the selection criteria. During the selection, the employer will apply the principle of reasonable adjustment to any impact the applicant's disability may have on the operations of the service.

3.4 Access to Training and Development

Wileo will provide equitable access to training and development opportunities for all employees.

3.5 Equal Employment Opportunity Complaints Procedure

Wileo will ensure that all complaints/grievances in relation to discrimination, regardless of whether they are of a major or minor nature, will be treated seriously and an investigation carried out fairly, efficiently and expeditiously.

All parties to a grievance have the right to:

- have grievances conducted in a fair, objective and unbiased manner;
- be treated with respect;
- be kept informed about the progress of the grievance;
- only have relevant factors taken into account in addressing the matter;

- not be subjected to any form of retribution, either stated or implied;
- have a support person present at all stages of the process, but not a legal representative. A support person may be a work colleague who may offer support but not act as an advocate;
- be informed, orally and in writing, of the outcome of the grievance including reasons;
- confidentiality.

All parties to the grievance are expected to:

- respect and consider alternative opinions;
- fully participate in the grievance process;
- not personalize issues.

3.6 Opportunity for resolution (informal process)

Any employee who considers they have been discriminated against should raise their concern/s directly with the party or parties involved to resolve their concerns without recourse to the formal complaints procedure. The employee may approach their line manager to notify their concern and to clarify possible strategies for resolving their concerns without recourse to the formal complaints procedure.

3.7 Lodgments of a complaint (formal process)

If the problem is not, or cannot, be resolved to the satisfaction of the aggrieved person through informal means, the following should be implemented:

The aggrieved person should place their complaint in writing with the employer, marked for the attention of the Managing Director. The complaint should set out the nature and details of the matter, as well as any suggestions they may have to resolve the complaint;

Once the complaint has been lodged, care will be taken not to discriminate against or victimize the complainant or any other party.

3.8 Consultation about a complaint (consultation phase)

Wileo's Managing Director have the authority to deal with the formal complaint lodged and to consult with the complainant and respondent and investigate and resolve the complaint as appropriate. Attempts will be made in all cases to resolve the complaint to the mutual satisfaction of those involved. This should occur as soon as is reasonably practicable.

3.9 Complaint investigation phase

If it is not possible to resolve the complaint through discussions with relevant parties expeditiously, Wileo Managing Director will conduct a formal investigation into the complaint. This investigation should be completed within 10 working days of the conclusion of the consultation phase. All documents related to the complaint will be kept confidential and shall not be produced or made available for inspection, except on instruction from a relevant authority consistent with the service's privacy policy.

3.10 Resolution of complaint following investigation

If, following investigation, a complaint is found to have substance, Wileo Managing Director will determine an appropriate plan of action to resolve or further advance resolution of the grievance. This may include the use of an external mediator to mediate on the grievance between the parties, but only if both parties are agreeable to participate in the mediation. If, following investigation, the complaint has not been substantiated, the complainant may be counselled.

3.11 Disciplinary actions

Wileo may have to take disciplinary action against employees, contractors or consultants who intentionally fail to follow our Equal Opportunity Policy. Disciplinary actions will be taken including:

- Demotion;
- Reprimand;
- Suspension or termination;
- Detraction of benefits for a definite or indefinite time.

4 References

4.1 Relevant Legislation

- Sex Discrimination Act 1984 (Commonwealth)
- Racial Discrimination Act 1975 (Commonwealth)
- Disability Discrimination Act 1992 (Commonwealth)
- Human Rights and Equal Opportunity Commission Act 1986 (Commonwealth)
- Fair Work Act 2009 (Commonwealth)
- Equal Opportunity Act 1984 (WA)

4.2 Related Policy

WLC-MS-POL-005 Code of Conduct

5 Responsibility and Approval

The Managing Director is directly responsible for this policy.

This policy is active from **November 2023** and to be reviewed in **November 2024**.



Guillaume Massardier

Managing Director

6 Version Control

REVISION	DATE	DESCRIPTION	AUTHOR	REVIEW	APPROVAL
1	01/22	Draft	Lea	Lea	Guillaume
2	10/22	Review policy accuracy, no changes	Lea	Lea	Guillaume