

PromoCollection

Equal Opportunity and Non Discrimination Policy

Objective

PromoCollection is an Equal Opportunity Employer. Under the Anti-Discrimination Act 1977 (NSW), it is unlawful for any employer, to discriminate against an employee or role applicant because of characteristics such as sex, marital status, pregnancy, race, age, religion, family responsibilities, physical and or intellectual disability, political beliefs, homosexuality or gender identification.

PromoCollection is committed to ensuring that the working environment is free from discrimination and harassment. Discrimination and harassment will not be tolerated under any circumstances and disciplinary action will be taken against any employee (or contractor) who breaches the policy.

Definitions

For each of the types of discrimination (or 'grounds' as the legislation refers to them) there are five categories of discrimination.

Direct Discrimination

Direct discrimination occurs where a person is treated less favourably than another person in the same or similar circumstances for the substantial reason of their having or being perceived as having any of the following attributes:

- Their race, colour, descent or national or ethnic origin, as defined under the Racial Discrimination Act 1975 (Cth)
- Their sex, marital status, pregnancy as defined under the Sex Discrimination Act 1984 (Cth)
- A disability as defined under the Disability Discrimination Act 1992 (Cth)
- Their age as defined under the Age Discrimination Act 2004 (Cth)
- And some grounds under the Australian Human Rights Commission Act 1986 (Cth).

This can also include religion, political beliefs, homosexuality or gender identification. It is also unlawful to directly discriminate based on professional

trade occupation, irrelevant medical records, irrelevant criminal record or personal association with someone who has one or more of the above attributes. Consequently, everyone must be treated equally.

Indirect Discrimination

Indirect discrimination occurs when a rule or policy is applied to everybody, but which has an unequal or disproportionate effect on particular grounds. Hence indirect discrimination applies more to policies and practices rather than discriminatory behaviour.

Harassment

Harassment is any form of behaviour that is not wanted, not asked for and not returned and is likely to cause the other person to feel humiliated, offended or intimidated. Harassment is generally directed at a person because of their sex, pregnancy, race, disability, homosexuality, gender identification, religion or age.

Victimisation

Victimisation occurs when a person subjects another person to detriment (or threatens to do so) because they have made, intend to make or have helped someone else make a complaint, or refused to do an act in contravention of this policy because they provided information about a complaint. It also includes acting to a person's detriment because they have agreed to be a witness.

Vilification

Vilification occurs when a person incites hatred towards, serious contempt for or severe ridicule of a person or group of person on the grounds of sex, marital status, pregnancy, race, age, religion, family responsibilities, physical and or intellectual disability, political beliefs, homosexuality or gender identification.

Policy

Through our commitment to this policy and the upholding of the laws relating to equal opportunity and anti-discrimination PromoCollection aims to:

- Uphold appropriate standards of conduct at all times,

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- Create a discrimination and harassment free working environment where all employees, contractors and customers are treated with courtesy and respect,
 - Implement procedures and training to guarantee employees know their rights and responsibilities,
 - Provide an effective procedure for complaints and treat all complaints with respect in a fair, timely and confidential matter,
 - Encourage employees to report breaches of the policy and ensure that there is no threat of victimisation or reprisal in the event of a complaint.

PromoCollection will not tolerate any form of discrimination or harassment and action will be taken against any employee who breaches the policy.

Fair Recruitment

We will recruit new employees fairly - on the basis of merit - that is, the person who is the best person for the role will get the role based on merit selection.

Fair Access to Workplace Opportunities and Benefits

All employees will be provided with fair access to all workplace opportunities and benefits - for example, to training and development, role allocation, shift allocation, promotion and leave. We will encourage every employee to make full use of their particular skills and abilities.

A fairer go for all people

We will take particular care to make sure that all people are not disadvantaged at PromoCollection.

Procedure

There are a number of options available to employees for dealing with discrimination and harassment ranging from dealing with the matter individually to making a formal complaint. Persons who believe they have been discriminated against should read the PromoCollection's Grievance Resolution Policy which outlines what investigations will take place and who to report the incident to. All complaints of discrimination will be treated seriously, promptly, confidentially

and impartially.

Employees will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.

If an employee has been found to be responsible for discrimination or harassment against another employee then disciplinary action will be taken. Victimisation of an employee that has made the complaint about discrimination or harassment, or has supported another employee's complaint will not be tolerated.

If an employee is found to have breached this policy or any related PromoCollection policies, the employee will be subject to disciplinary action, up to and including dismissal in accordance with PromoCollection's Misconduct Policy.

Responsibilities

All employees are required to undertake anti-discrimination and equal employment opportunity awareness training as part of their e-learning training modules to ensure understanding of and compliance with the policy.

Managers have a responsibility to:

- Monitor the working environment to ensure that acceptable standards of conduct are observed at all times. If Managers observe discrimination or vilification in the workplace, they should take the appropriate steps in response to ensure the behaviour stops and is appropriately dealt with
- Model appropriate behaviour themselves, including ensuring they do not engage in conduct in breach of this policy
- Ensure employees and other relevant persons understand this policy
- Treat all complaints seriously and take appropriate action in response to the complaints.

All employees of PromoCollection have a responsibility to:

- Ensure that they do not engage in any discriminatory behaviour, vilification or otherwise breach this policy
- Report any incidences of discrimination or vilification in the workplace
- Offer support to anyone who is being discriminated against or vilified and let them know where they can get help and advice (they should not however approach the employee complained against)
- Maintain complete confidentiality of information and cooperate during the investigation of a complaint.

Exceptions

There are no exceptions to this policy.