



Equal Employment Opportunity & Affirmative Action Policy

As part of its compliance processes, Gusher is committed to equal employment opportunity regardless of sex, sexual preference, marital status, race, religion, nationality, political conviction, age or other criteria. Merit relative to the position requirements will be the only consideration for entry into the company, selection, transfer and promotion.

The aim is to establish and maintain an organisational culture where diversity is respected and welcomed; where personnel are recognised for their work performance rather than non-work related attributes.

This policy applies to all employees working for the company.

Equal Opportunity

Equal opportunity is actively promoted by:

- creating an environment free of discrimination and harassment
- providing clear and accountable policies and practices
- developing and operating affirmative action programs to increase access and promote success in employment
- providing awareness opportunities on equity issues
- providing effective mechanisms to resolve complaints.

Equal Employment Opportunity

The company undertakes to promote equal employment opportunity for their employees in all aspects of work activities. Equal employment opportunity results when the person best qualified is successful, without discrimination. This is achieved through processes which are open, transparent, competitive and based on merit.

The company has a longstanding commitment to the elimination of unlawful direct and indirect discrimination and harassment on the basis of:

- race, colour, descent, national or ethnic origin, ethno-religious background
- sex
- marital status
- pregnancy or potential pregnancy
- disability, (including physical, intellectual or other disability and illnesses such as HIV/AIDs) whether real or imputed, past, present or future disabilities
- age
- sexuality
- transgender status
- carers' responsibilities.

This policy relates to all aspects of employment, including recruitment and selection, promotion, job classification, staff development, supervision and interpersonal relationships.

The company is committed to policies and programs ensuring that persons with equivalent skills and qualifications have an equal chance of obtaining a position and of advancing within the company.



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Employees have the right to work in an environment that is safe, equitable, free from discrimination and harassment, and in which everyone is respected and treated fairly. Employees also have a responsibility to treat other workers fairly, with respect and without discrimination or harassment.

Managers and Supervisors are required to implement equal opportunity in the workplace on a day-to-day basis, including:

- taking active steps to prevent and eliminate discrimination and harassment
- dealing fairly and equitably with complaints or grievances from employees
- managing employees fairly, including consulting them about decisions that affect them
- providing all employees with equitable access to development opportunities (e.g. training) to achieve their goals, and
- conducting recruitment and selection processes fairly and in accordance with correct procedures.

Affirmative Action

Affirmative Action is a systematic approach to the identification and elimination of barriers encountered by target group members. It involves the development of specific programs in consultation with all employees.

The company recognises that certain groups of people are affected by past or continuing disadvantage or discrimination in employment. As a result they may be more likely to be unemployed or working in lower paid jobs. These groups include women, indigenous Australians, members of racial, ethnic and ethno-religious minority groups, and people with a disability.

The company is committed to the development of affirmative action programs appropriate to our employee profile.

Responses to Discrimination or Harassment

Employees who believe that they have been subjected to discrimination or harassment should follow the practice as described below:

Step 1: Informal

Try to resolve the matter directly with the other party involved. The HR Manager is available to provide assistance on a confidential basis in the process.

Step 2: Informal

If the matter is unable to be resolved with the help of the HR Manager, it must be referred to a senior manager or Director for assistance in resolving the matter informally.

Step 3: Formal

Where a formal complaint is made an investigation of the alleged incident(s) shall be carried out and documented. Witnesses may be called upon as part of the investigation



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Step 4: Legal

If at any stage during the grievance procedure the complainant is not satisfied with the company's actions they may choose to take their matter to the State Equal Opportunity Tribunal or the Human Rights and Equal Opportunity Commission. This is a last resort

The Resolution Process

Resolution options include the following:

A: If a *complaint is substantiated*, the outcomes may include:

- An apology (either/both verbal/in writing);
- An undertaking that the behaviour will cease;
- Formal counselling for the harasser/discriminator;
- Disciplinary action – including a warning or dismissal
- Education and training
- Notifying the police (this is up to the complainant, not the company)

B: If a *complaint is not substantiated*, the outcomes may include:

- Explaining reasons for the decision
- Advising the complainant of their right to take the matter to external organisations or jurisdictions.
- Monitoring the situation to ensure there is no further victimisation.
- Reminding all employees of the company standards of behaviour

C: If after investigation, *the complaint is found to be false/frivolous*:

- Disciplinary action may be taken against the person who made the complaint
- Termination of employment may occur
- Counselling/training may be required.

The company's commitment to equal employment opportunity is communicated through this policy to employees and subcontractors at induction, and is displayed within the organisation as is practical.

This policy, as part of the integrated management system, is reviewed annually for continuing suitability.

Accountability for the IMS is the Managing Director and responsibilities delegated to senior management throughout the organisation as documented.

Authorised: B.L. Malady, Managing Director

Signed:

A handwritten signature in black ink, appearing to read "B.L. Malady", written in a cursive style.



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This policy shall be reviewed annually by the Managing Director in consultation with employees.