

EQUAL EMPLOYMENT OPPORTUNITY & ANTI-DISCRIMINATION POLICY

At Trackita Pty Ltd (“the Company”), we are firmly committed to maintaining a respectful, inclusive, and safe work environment for all. We do not tolerate any form of discrimination, bullying, harassment (including sexual and gender-based harassment), or other unlawful conduct. This policy outlines the standards of behavior expected from everyone associated with the Company and details how we address concerns that may arise.

1. Overview & Objectives

1. **Respect & Inclusivity:** We aim to create a workplace culture free from discrimination, bullying, sexual harassment, and gender-based harassment.
 2. **Fair Treatment:** Every individual should be treated with courtesy and dignity, regardless of position or seniority.
 3. **Retention & Diversity:** By upholding equal employment opportunity principles, we strive to attract, develop, and retain a skilled, diverse workforce.
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2. Scope

This policy applies to:

- **All Personnel:** Executives, managers, full-time, part-time, temporary, permanent employees, job applicants, interns, contractors, subcontractors, and volunteers.
 - **Work Context:** Any Company-related setting (e.g., on-site, off-site, or online), including conferences, work functions, business travel, and other events.
 - **Employment Aspects:** Recruitment, benefits, promotions, assignments, working hours, leave, performance evaluations, and access to Company equipment.
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3. Non-Contractual Nature

- This policy does not form part of any employment contract and does not confer contractual rights.
 - Any contractual terms will be documented in an employee's individual, written employment agreement.
 - Trackita Pty Ltd reserves the right to modify, revoke, or replace this policy at any time at its sole discretion.
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4. Staff Rights & Responsibilities

4.1 Rights

All staff have the right to:

1. **Merit-Based Processes:** Recruitment and selection decisions made solely on skills, qualifications, and experience.
2. **Safe Environment:** A workplace free from discrimination, bullying, sexual harassment, and gender-based harassment.
3. **Fair Complaints Process:** Lodge complaints or ask questions without fear of retaliation or negative consequences.
4. **Reasonable Flexibility:** Request accommodations for family responsibilities, disabilities, religious beliefs, or cultural practices.

4.2 Responsibilities

All staff are expected to:

1. **Comply with Policy:** Familiarize themselves with and uphold the standards set forth in this document.
 2. **Support Colleagues:** Direct anyone who experiences or observes misconduct to the appropriate resources for filing a complaint.
 3. **Maintain Confidentiality:** Refrain from unnecessary discussion of complaints and investigations.
 4. **Practice Respect:** Treat everyone—clients, coworkers, supervisors, and subordinates—with civility and consideration.
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5. Additional Responsibilities for Managers & Leaders

1. **Lead by Example:** Model behavior that aligns with the principles of this policy.
2. **Promote Awareness:** Ensure team members understand their obligations under the policy and relevant Australian laws.

3. **Address Issues Promptly:** Act swiftly upon being notified of possible misconduct.
 4. **Fair Complaint Handling:** Provide all parties a chance to voice their perspectives before making a decision.
 5. **Facilitate Informal Resolution:** Encourage direct, respectful dialogue to resolve smaller issues where appropriate.
 6. **Prevent Victimisation:** Protect employees from retaliation for raising or supporting a complaint.
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6. Unacceptable Conduct

Under Australian law, any form of discrimination, bullying, sexual harassment, or gender-based harassment is prohibited. Violations can result in disciplinary action, up to and including termination of employment. In some cases, the Company and individuals may also face legal repercussions.

7. Discrimination

Definition: Treating someone less favorably or imposing an unreasonable disadvantage because of protected attributes (e.g., race, sex, religion, pregnancy, age, disability).

- **Reasonable Adjustments:** In certain situations, employers are required by law to make “reasonable adjustments” to accommodate individuals with disabilities.
 - **Direct & Indirect:** Discrimination can be overt or subtle (e.g., policies that unintentionally disadvantage certain groups).
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8. Bullying

Definition: Repeated, unreasonable behavior toward a person or group that creates a risk to health and safety. It can include:

- Verbal abuse (face-to-face or written).
- Social exclusion or isolation.
- Unfair denial of workplace benefits or resources.

Where bullying relates to a protected attribute, it also constitutes discrimination. Any form of bullying is unacceptable and may breach workplace health and safety laws.

Note: Refer to the **Workplace Anti-Bullying and Anti-Harassment Policy** for further details on bullying and harassment not specifically tied to protected attributes.

9. Sexual Harassment & Gender-Based Harassment

9.1 Sexual Harassment

Unwelcome sexual conduct that makes someone feel offended, humiliated, or intimidated. Examples include:

- Comments on personal appearance or private life.
- Uninvited touching or physical contact.
- Repeated requests for dates when declined.
- Sharing sexually explicit images or messages.
- Making sexual gestures or innuendoes.

9.2 Gender-Based Harassment

Unfair treatment or intimidating behavior directed at someone because they are male or female. This may include comments implying only men or women can fulfill certain roles or responsibilities.

A **single incident** can suffice to constitute harassment, and the Company takes all reports seriously.

10. Locations & Circumstances

This policy applies to interactions:

- In the workplace.
 - At work-related gatherings (e.g., parties, conferences).
 - During work-related travel or off-site client visits.
 - Outside of standard work hours if related to Company business or relationships.
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11. Reporting a Concern

1. **Immediate Reporting:** Anyone who feels they have been mistreated—or witnesses misconduct—should inform a manager, supervisor, or a designated Company representative without delay.
 2. **No Retaliation:** Reporting staff will be protected from victimisation or reprisals for raising concerns in good faith.
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12. Confidentiality

- **Respect for Privacy:** All inquiries, complaints, and investigations should be kept as confidential as possible.
 - **Avoid Gossip:** Unauthorized disclosure of details related to a complaint or investigation may warrant disciplinary action.
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13. Victimisation Prohibited

Retaliating against someone who has filed a complaint or assisted in resolving a complaint is a serious breach of this policy and Australian law. This includes any intimidation, ostracism, or punishment directed at those who exercise their rights.

14. Public Hate Speech (Vilification)

Publicly offending, humiliating, or inciting hatred toward a person or group based on traits like race, gender, religion, or sexual identity is illegal and strictly prohibited. The Company has zero tolerance for such behavior.

15. Fair Hiring Practices

- **Skills & Qualifications First:** Recruitment decisions are based on an individual's capabilities, experience, and suitability for the role.
 - **Equality in Employment:** Hiring practices will not be influenced by personal characteristics unrelated to job performance.
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16. Consequences

Breaches of this policy may lead to disciplinary action, up to and including termination of employment. In certain cases, violators may face legal consequences under Australian law.

17. Associated Policies

For a comprehensive understanding of Trackita's standards and procedures, refer to:

- **Workplace Anti-Harassment & Anti-Bullying Policy**
 - **Code of Conduct**
 - **Grievance Handling Policy**
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18. Commitment to a Respectful Workplace

By adhering to this Equal Employment Opportunity & Anti-Discrimination Policy, every individual at Trackita Pty Ltd helps cultivate a positive, safe, and inclusive work environment. We appreciate your cooperation in upholding these principles, which are essential to our success and reputation as an employer of choice.