



Policy Name:	Bullying & Harassment Policy
Attention:	LSH Group Australia Employees
Version:	1.3
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Approved By:	GCEO / Corporate Review / MD

Bullying and Harassment Policy

1. Purpose

LSH Group Australia ("the Group") is committed to providing a respectful, inclusive, and safe workplace that is free from workplace bullying, harassment, sexual harassment, discrimination, and victimisation.

The Group recognises that bullying and harassment can cause serious psychological and physical harm to individuals and negatively impact workplace culture, safety, and performance. This policy supports the Group's obligations to eliminate or minimise psychosocial risks and to provide a work environment that is safe and without risks to health, so far as is reasonably practicable.

All Workers have a shared responsibility to take reasonable care that their conduct does not adversely affect the health and safety of others.

2. Scope

This policy applies to all employees (permanent, fixed-term and casual), contractors, labour hire workers, consultants, officers, and representatives of the Group ("Workers").

The policy applies to conduct that occurs:

- In the workplace;
- While performing work-related duties;
- During work-related events, travel, or training;
- Through work-related communications, including email, text, phone, and social media;
- Where conduct impacts the workplace, even if it occurs outside normal working hours.

3. Legislative Framework

This policy is informed by and must be applied consistently with applicable Australian legislation and regulatory guidance, including but not limited to:

- *Work Health and Safety Act 2011* (Cth and State equivalents);
- *Fair Work Act 2009* (Cth);
- *Sex Discrimination Act 1984* (Cth);
- *Australian Human Rights Commission Act 1986* (Cth);
- State and Federal anti-discrimination and equal opportunity legislation;
- *Privacy Act 1988* (Cth);
- Fair Work Commission and Safe Work Australia guidance on workplace bullying and psychosocial hazards.

4. Policy Objectives

The objectives of this policy are to:

- Promote dignity, respect, and appropriate workplace behaviour;
- Prevent bullying, harassment, sexual harassment, discrimination, and victimisation;
- Provide clear guidance on rights, responsibilities, and acceptable conduct;
- Ensure concerns are raised, managed, and resolved promptly and fairly;
- Meet the Group's work health and safety and equal opportunity obligations.

5. Definitions

Workplace Bullying

Repeated and unreasonable behaviour directed towards a worker or group of workers that creates a risk to health and safety.

- **Repeated behaviour** refers to persistent behaviour that may involve a range of actions over time.
- **Unreasonable behaviour** is behaviour that a reasonable person would consider victimising, humiliating, intimidating, or threatening.

Workplace Harassment

Unwelcome behaviour that offends, humiliates, or intimidates a person and is related to a protected attribute under discrimination law. Harassment may be a single incident or repeated behaviour.

Sexual Harassment

Any unwelcome sexual advance, request for sexual favours, or other unwelcome conduct of a sexual nature where a reasonable person would anticipate the possibility that the person harassed would feel offended, humiliated, or intimidated.

Discrimination

Occurs when a person is treated less favourably, or experiences adverse action, because of a protected attribute such as sex, age, race, disability, pregnancy, religion, sexual orientation, family or carer responsibilities, or other attributes protected by law.

Victimisation

Subjecting a person to detriment because they have made, or propose to make, a complaint or have participated in a complaint process.

6. What Constitutes Bullying and Harassment

Examples may include, but are not limited to:

- Persistent unwarranted criticism or undermining behaviour;
- Insults, belittling comments, or offensive language;
- Intimidation, threats, or aggressive behaviour;
- Unwanted physical contact or invasion of personal space;
- Social exclusion or isolation;
- Deliberately withholding information necessary for work;
- Setting unreasonable or impossible deadlines;
- Offensive jokes, images, or material (including electronic communications).

7. What is Not Bullying or Harassment

Reasonable Management Action

Reasonable management action carried out in a reasonable manner is not bullying or harassment. This may include:

- Allocating work, setting goals, standards, and deadlines;
- Providing feedback or managing performance;

- Taking disciplinary action in accordance with policy;
- Transferring or redeploying workers for operational reasons;
- Managing workplace conflict.

Workplace Conflict

Differences of opinion or disagreements alone do not constitute bullying or harassment. However, unmanaged conflict may escalate and should be addressed early.

8. Health and Wellbeing Impacts

Bullying and harassment may result in serious impacts, including stress, anxiety, reduced performance, physical illness, relationship breakdowns, and other psychological harm.

9. Employee Assistance

The Group provides access to an Employee Assistance Program (EAP) to support Workers experiencing distress related to workplace issues. The EAP is confidential and available at no cost to employees.

10. Roles and Responsibilities

The Group will:

- Provide a safe and respectful workplace;
- Maintain clear procedures for raising and managing concerns;
- Investigate complaints promptly, confidentially, and fairly;
- Take appropriate action where misconduct is substantiated;
- Protect Workers from victimisation.

Managers must:

- Model appropriate behaviour;
- Act promptly on observed or reported issues;
- Support affected Workers;
- Escalate serious matters to Human Resources;
- Prevent victimisation.

Human Resources will:

- Provide advice and support;
- Coordinate investigations;
- Ensure procedural fairness;
- Maintain records in accordance with privacy obligations.

Workers must:

- Treat others with respect;
- Comply with this policy;
- Report inappropriate behaviour;
- Cooperate with investigations;
- Not engage in victimisation.

11. Reporting and Complaint Handling

Reporting

Concerns may be raised informally or formally with a Manager, Human Resources, or Dealer Principal. Serious matters must be escalated to Human Resources.

Informal Resolution

Where appropriate, early intervention or informal resolution may be attempted, including discussion, mediation, or guidance.

Formal Investigation

Serious matters or unresolved complaints may proceed to a formal investigation. Investigations will be impartial, confidential, and evidence-based.

12. Procedural Fairness

All complaints will be managed in accordance with principles of procedural fairness, including impartial decision-making, the right to respond, and decisions based on evidence.

13. Outcomes and Consequences

If a breach of this policy is substantiated, outcomes may include counselling, training, formal warnings, disciplinary action up to and including termination of employment. Serious conduct may also expose individuals and/or the Group to legal consequences.

14. Record Keeping and Confidentiality

All records will be maintained confidentially in accordance with the *Privacy Act 1988* (Cth). Information will only be disclosed on a need-to-know basis.

15. Policy Review

This policy will be reviewed at least every 12 months, or earlier if required due to legislative or operational changes.

16. Policy Status

This Policy does not form part of any employee's contract of employment. It is a lawful and reasonable direction of the Company with which compliance is required. Any statement in this Policy about what the Company will or will not do does not create a legally binding obligation on the Company.

This Policy may be amended from time to time to reflect changes in legislation, regulatory requirements or organisational needs.

(Appendix A) - Bullying & Harassment Reporting Form

Incident/s Details

I am making this report of bullying and/or harassment as:

- ☐ The Complainant
- ☐ Bystander

Date/s behaviours occurred:

Name of person/s involved:

Describe the incidents/s in your own words, giving as much detail as possible:

Behaviours

Please select the types of behaviours that have occurred. You can select more than one.

- ☐ Discriminatory comments and/or actions
- ☐ Abuse / Threat / Insult
- ☐ Shouting and/or aggressive language
- ☐ Offensive or abusive language
- ☐ Unwanted physical contact
- ☐ Intimidation
- ☐ Setting unrealistic workloads / deadlines
- ☐ Other:

What was your reaction:

Who witnessed the incident/s:

Who helped? Who did nothing? Who else is being affected?

Frequency

Please select the frequency of the incidents:

- ☐ Once
- ☐ Daily
- ☐ Weekly
- ☐ Monthly
- ☐ Occasionally
- ☐ Other:

Location

Where did the incident/s occur:

Reporting

Who have you reported the incident/s to? You can select more than one person.

- ☐ No one
- ☐ My supervisor / direct report
- ☐ Dealer Principal
- ☐ Human Resources
- ☐ Other:

When did you report it:

How did you report it?

- ☐ Verbally
- ☐ In writing
- ☐ Email

What happened when you reported the incident:

What actions were taken by the person you reported the incident to:

Who have you told outside of work:

I believe that the bully.. (Please select all relevant options)

- ☐ Is joking and doesn't mean for their actions to upset / intimidate me
- ☐ Is still a nice person
- ☐ Was my friend
- ☐ Became a bully after a disagreement at work
- ☐ Enjoys hurting / upsetting me
- ☐ Follows an example set by their supervisor
- ☐ Bullies other staff
- ☐ Other:

Outcome

What would you want as an outcome / solution?

From the bully:

From your employer:

From yourself:

Do you have any additional information that you would like to provide:

Your Details (optional)

Note: you cannot be advised of an outcome if you do not identify yourself

Your Name:

Your Contact Details:

(Appendix B) - Resolution of Workplace Harassment or Bullying Grievance Flowchart

If you have decided to proceed with an informal or formal process for Workplace Harassment or Bullying, the following steps must be followed:

