

GRIEVANCE POLICY

1. Overview

GPT aspires to foster a unified, authentic and courageous workplace in which all employees respect each other's diverse range of experiences and backgrounds. To maintain a collaborative work environment, GPT ensures that employees have every opportunity to express grievances and have them resolved in a fair, equitable and prompt manner.

2. Purpose

This policy sets out The GPT Group's commitment to providing a safe and harmonious work environment and provides a guideline to facilitate the resolution of complaints, grievances or problems raised by employees.

3. Scope

This policy applies to all GPT employees whether on a permanent, casual, temporary or contract basis.

4. Policy

4.1 Informal Grievance Handling Process

For all grievances, GPT reserves the right to determine the nature of the response. Generally, for grievances of a less serious nature, an informal grievance handling process can often be the best method of resolution. This usually consists of a direct discussion between the parties to resolve the issue.

On occasion, this may be facilitated or mediated by a manager or a member of the People and Performance team, but generally speaking it is a direct discussion where the issue is discussed and resolved between the affected parties. Done at an early point and in a constructive fashion, many minor disputes and issues can be adequately resolved to the satisfaction of all participants.

4.2 Formal Grievance Handling Process

For grievances of a more serious or sustained nature, a formal grievance handling process may need to be accessed. When a formal grievance handling process is determined as required by the GPT Group, it is characterised by the following features:

- **Confidentiality** – The issue is only discussed with those that have a genuine need to know. These individuals may include the parties directly involved in the incident, witnesses, those who may make a decision on potential disciplinary action, and those involved in the investigation.
- **Fairness** – Grievances will be fairly and impartially investigated with the view of a fair outcome for all parties.
- **Sensitivity** – Certain grievances may involve particularly personal information about the individuals involved. These revelations will be dealt with in a sensitive fashion.
- **Resolution** – If a formal grievance processed is commenced it will be given the resources required to ensure that it is investigated and resolved in a timely fashion.
- **No Victimisation** – All parties (*i.e.* complainant, the person(s) complained about, and any witnesses) to a formal grievance will be advised that any form of victimisation or reprisal against any other party will result in immediate disciplinary action, which may include termination of employment.

4.2.1 Steps in the Formal Grievance Handling Process

The steps within the Formal Grievance Handling Process will be determined by the GPT Group based on the nature of the grievance. These steps may include some or all of those detailed below:

1. **Notification:** Formal grievances should be advised to your manager who must then advise People & Performance. If it is not appropriate to raise the matter with your manager then the grievance can be raised directly with People & Performance. If an employee does not feel able to use the existing

reporting channels due to the nature and/or seriousness of the issue then they may raise the matter with GPT's Whistleblower Officer. Please see the Whistleblower Policy.

2. **Initial Investigation:** The investigation will be conducted by People & Performance (or delegate, for example, Risk) and will commence with interviews with both the complainant (to establish the relevant information relating to the complaint) and the person(s) complained about (to obtain a response to the issues raised with the person(s) complained about). All parties will be advised that any contentious behaviour must stop and steps may be taken to prevent it, and these steps may include removing one or both parties from the workplace. Alternatively, if the opportunity presents for People & Performance to mediate or broker a solution to the dispute then this will be attempted.
3. **Further Investigation:** If the grievance cannot be resolved at an earlier phase or is of a particularly serious nature additional interviews and investigation may be required. This may include interviews with witnesses and/or the seeking relevant documentation, files, emails, phone records etc.
4. **Further interviews with Complainant and the Person(s) Complained About:** Additional interviews may be required to substantiate certain facts and/or to review information that has come out of the wider investigation of the issue and give the parties a further opportunity to respond.
5. **Determination on the Complaint:** Once the parties have been interviewed or re-interviewed and all relevant information reviewed, People & Performance will come to a determination on what constitutes a fair outcome of the grievance. This determination may be done in consultation with one or more members of the Leadership Team.
6. **Reporting Back:** People & Performance will report back to the complainant and the person(s) complained about with the outcome of the investigation.
7. **Actions:** Any disciplinary or other actions determined as a resolution of the investigation will then be actioned, and the ongoing situation monitored.

A formal grievance handling process can result in a range of possible actions which may or may not include disciplinary action (which, if it occurs, may include termination of employment). It should be noted that if a formal grievance is found to be without basis, or made in a frivolous or vindictive fashion, the individual lodging the complaint may be subject to disciplinary action, which may include termination of employment.

5. Roles and Responsibilities

Everyone who works at the GPT Group is responsible for ensuring that they:

- are familiar with this policy;
- comply with this policy; and
- attend regular GPT Group training.

People who work in supervisory positions at the GPT Group must also take all reasonable steps to ensure that the workplace is free from unacceptable behaviour and that any grievance raised by a team member is taken seriously and dealt with promptly in line with this policy.

6. Related Policies Procedures and Guidelines

- Equal Employment Opportunity and Workplace Behaviour Policy
- Whistleblower Policy
- Please refer to the Workplace Conduct & Issue Resolution page on the eXchange for a copy of the Grievance Resolution Flowcharts

7. Ownership and Version Control

Policy Owner	Phil Taylor – Head of People and Performance
Version	3
Date	April 2016
Classification	GPT Internal Use Only
Revision Status	Approved
Author	Shey Hooper
Email	Shey.hooper@gpt.com.au
Organisation	People and Performance

Revision	Description	Author
1	Original Version located eXchange intranet page	-
2	Policy review and Standard Format Adopted Final copy – approved by Chief Risk Officer 6 May 2014	Amanda Simpson
3	Policy review – 8 April 2016	Shey Hooper