

Grievance Policy

1. Overview

GPT aspires to be a workplace in which all employees respect each other's diverse range of experiences and backgrounds. To maintain an inclusive, supportive and high performing work environment, GPT aims to provide its employees with various mechanisms to express grievances and have them resolved in a fair, equitable and prompt manner.

2. Purpose

This policy sets out GPT's approach 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. What is a grievance?

A grievance is any concern, problem or complaint you have about your work, your workplace or the people you work with. It might relate to how you have been treated, a decision that affects you, your working conditions, or the behaviour of another person. Raising a grievance simply means letting GPT know about it so that it can be looked into and, wherever possible, resolved.

In this policy, the person who raises a grievance is called the complainant, and the person a grievance is about is called the respondent.

4. Scope

This policy applies to all GPT employees whether on a permanent, casual, temporary or fixed-term contract basis. While employees are required to comply with the terms of this policy, this policy does not form part of any employee's employment contract and may be reviewed, amended or withdrawn from time to time, at GPT's discretion. GPT also applies the principles and protections in this policy to others who work with us, including contractors, labour hire workers, work experience placements and volunteers.

5. Policy

This policy is a guide. GPT will follow the process that best suits each grievance and may adapt these steps to fit the circumstances.

At a glance: There are two ways a grievance can be resolved. Most concerns can be sorted out through the direct resolution process, which is usually a supported conversation. Where a matter is more serious, or cannot be resolved that way, the formal grievance process applies. Support is

available to you at every stage, and you can bring a support person to any meeting. An overview of both pathways is set out in Appendix 1.

5.1 Direct Resolution Process

Generally, for grievances of a less serious nature, an early resolution process can often be an appropriate method of resolution. This usually consists of a direct discussion between the relevant parties to resolve the issue. Where an employee does not feel comfortable with raising an issue directly with the person concerned, or the issue is potentially more serious in nature or cannot be resolved through a direct discussion, the employee should approach their line manager or the People team.

On occasion, this process may be facilitated or mediated by a manager or a member of the People team. More frequently however it generally takes the shape of a direct discussion being held between the affected parties where the issue is resolved in that setting. Done at an early point and in a constructive way, many minor disputes and issues can be adequately resolved to the satisfaction of all participants in this way.

The reaching of a resolution directly between the parties does not prevent GPT from taking any other action that it considers appropriate in response to a grievance. For example, in circumstances where an informal resolution is reached between parties, and GPT is of the view that the information disclosed in the grievance poses a potential risk to the health and safety of GPT employees, GPT may decide that a further response to the grievance is required.

5.2 Formal Grievance Handling Process

For grievances of a more serious or sustained nature, or where the direct resolution process has been unsuccessful, a formal grievance handling process may be followed. When a formal grievance handling process is followed, it will generally have the following features:

- **Confidentiality** – The grievance will only be discussed with others on a “need to know” basis (to the extent this is reasonably possible). These individuals may, for example, 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 handled fairly and impartially with a view to obtaining a fair and timely outcome for all parties. Any investigation will also be conducted in a fair and impartial manner. This means the respondent will be told what has been alleged, given a genuine opportunity to respond before any decision is made, and the matter will be decided by someone impartial.
- **Sensitivity** – Certain grievances may involve particularly personal information about the individuals involved. This information will be dealt with sensitively.
- **No Victimisation** – All persons (i.e. the complainant, the person(s) complained about, and any witnesses) involved in a formal grievance will be advised that any form of victimisation

or reprisal against any other person involved or suspected to be involved in the grievance will result in disciplinary action, which may include termination of employment.

- **Support** – Anyone involved in a grievance, including the complainant, the respondent and any witnesses, may bring a support person to any meeting or interview, and can access confidential support at any time (see Support and wellbeing below).

5.2.1 Steps in the Formal Grievance Handling Process

The formal grievance handling process will include such steps as may be determined to be appropriate by GPT based on the nature of the grievance. These steps may include some or all of the following:

1. **Notification:** An employee may raise a formal grievance with their manager, who will then advise a member of the People team. If it is not appropriate to raise the matter with the employee's manager, then the grievance can be raised directly with a member of the People team. Certain grievances may be more appropriately reported and dealt with in accordance with GPT's Whistleblower Policy, a copy of which can be located on Skyline (GPT's intranet). GPT will acknowledge a grievance in a timely manner and will keep the parties informed as it progresses.
2. **Early resolution:** If an opportunity presents for the People team to mediate or facilitate a solution to the dispute at an early stage, and it is appropriate to do so, then this may be attempted.
3. **Investigation:** Depending on the nature of the grievance, an investigation may be necessary to clarify what has occurred and to determine the best course of action to resolve the issue. Any investigation will be conducted by the People team (or a delegate, for example, Legal, Risk or external investigator) and will involve speaking with people who are involved in the grievance. This will generally involve one or more 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 from the person(s) complained about). The investigation may also involve speaking with witnesses and/or obtaining and reviewing relevant documentation, files, emails, phone records, etc. GPT may put interim measures in place to protect those involved while a grievance is being looked into, for example adjusting reporting lines, work location or duties. These measures are precautionary and are not a finding against any person.
4. **Outcomes:** Based on all of the available information, including the findings of any investigation, a determination will be made as to whether the allegations of the grievance have been substantiated and what actions will be taken in response. Such actions may, for example, involve disciplinary action, up to and including termination of employment, and/or ongoing monitoring of the situation.
5. **Reporting Back:** Where appropriate, the People team will report back to the complainant and the person(s) complained about regarding the outcome of the investigation.
6. **Review:** An employee may request a review of the grievance outcome where they believe:

- the grievance procedure was not followed;
- relevant information was not considered and could not reasonably have been provided earlier; or
- there is new information that may materially impact the outcome.

To request a review, please contact the Head of People Business Partnering and Experience or the Chief People Officer within a reasonable time of being told the outcome, and explain which of these reasons applies. The review will be completed by someone who was not involved in the original decision. A request for review is not an opportunity to re-investigate a matter simply because an employee disagrees with the findings of the outcome.

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). A grievance raised honestly and in good faith will not lead to any disadvantage to the person who raised it, even if it is not ultimately substantiated. It should be noted that if a formal grievance is found to have been made in bad faith, or in a knowingly false, frivolous or vindictive way, the individual lodging the complaint may be subject to disciplinary action, outcomes of which may include termination of employment. Further explanation of disciplinary action and outcomes can be found in Appendix 1 of the Code of Conduct.

5.3 Reporting of Grievances

General statistics outlining the number of grievances, themes and outcomes are periodically reported to the Executive Team and Board to assist them in assessment and management of GPT's culture.

6. Support and wellbeing

GPT takes a supportive, person centred approach to grievances. Raising or being involved in a grievance can be stressful, and support is available to everyone involved, whether or not a matter proceeds to a formal process.

You may bring a support person, such as a colleague, friend or union representative, to any meeting or interview. A support person is there to support you, not to advocate or answer on your behalf.

Free and confidential counselling is available through GPT's Employee Assistance Program (Telus Health) on 1300 361 008. External support is also available through 1800RESPECT on 1800 737 732.

Using this internal process does not remove your legal rights. You may also seek advice or assistance externally, for example from the Fair Work Commission, the Fair Work Ombudsman, a relevant anti-discrimination body.

7. Roles and Responsibilities

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

- are familiar with this policy;
- comply with this policy; and

- attend regular GPT training.

People who work in supervisory positions at GPT 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.

8. Related Policies Procedures and Guidelines

- Code of Conduct
- Equal Employment Opportunity and Workplace Behaviour Policy
- Sexual Harassment Policy
- Whistleblower Policy
- [Workplace and Conduct Resolution page on Skyline](#)
- Grievance Resolution Pathways – see Appendix 1

9. Document Control

Policy Owner	Lucy Nowland – Head of People Business Partnering and Talent
Version	7
Date	June 2026
Classification	GPT Internal Use Only
Revision Status	Approved
Author	Lucy Nowland
Email	Lucy.Nowland@gpt.com.au
Team	People Team

Revision	Description	Author
1	Original Version located 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
4	Policy review – update to section 4. Policy	Amanda Neill
5	Policy review	Amanda Neill
6	Policy review in conjunction with Sexual Harassment Policy October 2023	Lucy Nowland
7	Policy review and update	Lucy Nowland

Version	Document Owner	Author	Description	Document Approver	Approval / Revision Date
1	-	-	-	-	-
2	-	Amanda	Policy review	Chief Risk	May 2014

Version	Document Owner	Author	Description	Document Approver	Approval / Revision Date
		Simpson		Officer	
3	Head of People and Performance	Shey Hooper	Policy review	-	April 2016
4	Chief People Officer	Amanda Neill	Policy review, section 4	-	-
5	Chief People Officer	Amanda Neill	Policy review	-	-
6	Chief People Officer	Lucy Nowland	Policy review	Chief People Officer	Oct 2023
7	Head of People Business Partnering and Talent	Lucy Nowland	Policy review and update	Chief People Officer	June 2026

Appendix 1 – Grievance Resolution Pathways

