

Sexual Harassment and Sex or Gender-based Harassment Policy

The Group

Effective Date: May 2025

Next Review Date: May 2026

Approved by: Alyssa Shoppee – RTW & Safety Manager

1. Purpose

This policy affirms Brexa Australia & New Zealand, Clicks IT Recruitment, Index, HOBAN Recruitment Pty Ltd, Staff Solutions Bilingual (SSB), RED Appointments and RED Appointments NT and RAP2 are committed to providing safe, respectful, and inclusive workplaces for all employees, including on-hire workers, permanent staff, contractors, and candidates. Sexual harassment will not be tolerated under any circumstances.

2. Scope

This policy applies to:

- All permanent, full-time, part-time, and casual employees
 - On-hire (labour hire) employees placed at host sites
 - Contractors, consultants, interns, and candidates
 - Any work-related context, including client sites, work events, travel, and online interactions
 - All companies under the Group – HOBAN Recruitment PTY LTD (ABN 88 052 201 313), Staff Solutions Bilingual (ABN 88 052 201 313), RED Appointments (ABN 35 138 057 510) Brexa Finance Shared Services Pty Ltd (ABN 25 006 776 343), Clicks Recruit ABN (87 078 625 242), Index (ABN 33 123 720 043), and RED Appointments NT (ABN 83 153 591 586) and RAP2 (ABN 25 630 066 482)
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3. What is Sexual Harassment?

Sexual harassment is unwelcome conduct of a sexual nature that a reasonable person would find offensive, humiliating, or intimidating. It includes, but is not limited to:

- Unwanted touching or physical contact
 - Sexual jokes, comments, or innuendo
 - Repeated requests for dates or sexual favours
 - Display or sharing of sexually explicit images or materials
 - Sending inappropriate emails, messages, or social media content
 - Behaviour that creates a hostile or uncomfortable work environment
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4. Legal Framework

This policy complies with:

- Sex Discrimination Act 1984 (Cth)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2011 (Cth)
- Relevant State and Territory anti-discrimination laws

The Group and its Host Employers (client's sites) have legal obligations to prevent and respond to sexual harassment involving HOBAN Recruitment Group staff and all on-hire employees.

5. Our Commitments

The Group will:

- Promote a culture of respect and zero tolerance for harassment
 - Apply and review the Group's Sexual Harassment Prevention Plan
 - Take all reports of sexual harassment seriously and investigate them confidentially and promptly
 - Take appropriate action, including disciplinary measures, where necessary
 - Ensure all employees are aware of their rights and responsibilities
 - Support affected individuals, including access to Employee Assistance Programs (EAP) and counselling
 - Monitor workplace culture and review policies regularly
 - Review and monitor Host Employer sites by ensuring the Host Employer Assessment Form is competently completed
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6. Responsibilities

a. All Employees (Permanent and On-Hire)

- Treat everyone with dignity and respect
- Refrain from engaging in any form of sexual harassment
- Report any observed or experienced inappropriate behaviour

b. Managers and Supervisors

- Lead by example and uphold professional conduct
- Respond promptly and sensitively to any concerns raised
- Support staff involved in complaints

c. Host Employers (Client Sites)

- Maintain a safe and respectful environment for on-hire staff
- Cooperate in resolving any complaints involving on-hire personnel
- Comply with joint duty of care obligations under WHS and anti-discrimination laws

7. Reporting and Complaints Procedure

Reports can be made to:

- Your direct manager or supervisor
- Your Recruitment Consultant, Account Manager, Business Manager
- By using the 'Report a Workplace Hazard, Accident, Workplace Bullying or harassment' link on the HOBAN Website <https://www.hoban.com.au/hoban-on-hire-employees/>
- HOBAN Recruitment's EEO and Harassment Officer, Emily Robertson - email: emilyr@hoban.com.au phone: (03) 9203 4904

Anonymous reports will be considered but may limit our ability to investigate fully.

Investigation Process

- To investigate The Group will utilise the Complaint Management Procedure and use the Complaint Investigation Report to ensure consistency
- All complaints will be treated confidentially and impartially
- Investigations will follow the principles of **natural justice**
- Both the complainant and respondent will be informed of the outcome

Outcomes

Outcomes may include:

- Counselling, warnings, or termination of employment
- Reassignment or removal from host sites
- Support for complainants to return to a safe work environment

Victimisation of any person making a complaint is strictly prohibited.

8. Training and Awareness

All permanent and on-hire staff will receive:

- Induction training on sexual harassment and respectful workplace behaviour
 - Refresher training annually or as required
 - Guidance for working at client sites, which may include client or site-specific policies
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9. Review and Continuous Improvement

This policy will be reviewed **annually** or after any incident or legislative change. Staff input will be sought as part of the review process.

10. Contact Information

For support or to make a complaint, please contact:

Alyssa Shoppee – RTW & Safety Manager

Email: alyssas@hoban.com.au

Phone: 0488 017 907

Stephen Hall – ER/IR Manager

Email: stephenh@redappointments.com

Phone: (08) 7071 7350 Mobile: 0414 822 460

Naomi Vanderkley – Employee Experience Manager

Email: naomi.vanderkley@clicks.com.au

Phone: (07) 3027 2559 Mobile: 0420 314 502

Declaration

All employees are required to read, understand, and comply with this policy. Breaches may result in disciplinary action, which may include dismissal.