



# WORKPLACE POLICY & PROCEDURES MANUAL

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## BULLYING, HARASSMENT AND EQUAL OPPORTUNITY POLICY

### Application of policy

1. This policy applies to all employees of Indepet Ltd (**Indepet**) (**Employees**).
2. In this policy:
  - 2.1. except where a contrary meaning is indicated, **CEO** means the CEO of Indepet or the CEO's nominated representative.
  - 2.2. **Company** means Indepet Ltd.
  - 2.3. **the affected employee** means any Employee who is subjected to, or who makes a complaint of bullying, harassing or discriminatory behaviours.
  - 2.4. **workers** includes Employees as well as independent contractors engaged by the Company, and its employees, sub-contractors or other individuals engaged to perform work or provide services on their behalf.
3. This policy applies to conduct occurring at, or in connection with work, including conduct which occurs out of work hours and away from the workplace (for example at work functions or events or online).

### Policy objective and scope

4. The Company responsibilities, so far as it is reasonably practicable, is to provide and maintain a working environment for their Employees that is safe and without risks to health and to ensure that persons other than Employees are not exposed to risks to their health and safety arising from the conduct of the Company's business.
5. Employees and other workers also have responsibilities to take reasonable care for their own health and safety and the health and safety of others who may be affected by their conduct.
6. In line with these responsibilities, the Company expect the workplace to be free from unlawful discrimination, bullying and harassment. The purpose of this policy is to assist to ensure that:
  - 6.1. unlawful discrimination, harassment and bullying do not occur in the Company's workplace, or in connection with work;
  - 6.2. Employees who make a genuine complaint about unlawful discrimination, harassment or bullying are not unlawfully victimised;
  - 6.3. if unlawful discrimination, harassment, or bullying has occurred in the workplace, or in connection with work, it is reported and appropriately addressed; and
  - 6.4. there is awareness in the Company's workplace of the prohibition against unlawful discrimination, harassment and bullying and the potential consequences if the prohibition is breached.

### What is unlawful discrimination?

7. Unlawful discrimination may occur if a person treats or proposes to treat another person less favourably in areas protected by law (including in employment and in connection with the provision of goods and services) because the other person has a particular attribute, or if the

first person imposes a condition, requirement or practice that is not reasonable and has the effect, or is likely to have the effect, of disadvantaging persons with that attribute.

8. The attributes covered by equal opportunity laws include:

- age;
- breastfeeding;
- employment activity;
- gender identity;
- disability;
- industrial activity;
- lawful sexual activity;
- marital status;
- parental status or status as a carer;
- family or carer's responsibilities;
- pregnancy;
- physical features;
- political belief, activity or opinion;
- race;
- descent or national or ethnic origin;
- colour;
- national extraction;
- social origin;
- religious belief or activity;
- sex;
- sexual orientation;
- an expunged homosexual conviction; and
- personal association with a person who is identified by reference to any of the above attributes.

9. Unlawful discrimination may also occur if a person engages in conduct that may offend, insult, humiliate or intimidate another person, or which incites hatred against, or serious contempt for, or revulsion or severe ridicule of that person, on the ground of race or religion.

#### **What is workplace harassment or bullying?**

10. Workplace harassment or bullying is repeated, unreasonable behaviour directed towards a worker or group of workers, that creates a risk to health and safety.

11. **"Unreasonable behaviour"** includes behaviour that a reasonable person, having regard to all the circumstances, would consider unacceptable or inappropriate, and behaviour that a reasonable person would expect to intimidate, victimise, humiliate, undermine, insult, hurt or threaten another person.

12. **"Repeated behaviour"** can include a range of behaviours over time.

13. **"Behaviour"** can include actions or omissions of individuals or a group and may involve using a system of work as a means of victimising, humiliating, undermining or threatening.

14. Bullying or harassing behaviour may include (but is not limited to):

- 14.1. verbal abuse, threats, sarcasm, and other forms of demeaning or offensive language or communication;
- 14.2. isolating or ostracising behaviour;
- 14.3. constant unconstructive criticism or nit-picking;
- 14.4. vexatious complaints;

- 14.5. deliberately withholding information that a person needs to adequately exercise her or his role;
  - 14.6. directing physical violence, attacks, threats or repeated pranks towards a person;
  - 14.7. unreasonably overloading a person with work or allowing insufficient time for completion and then criticising the employees work in relation to this;
  - 14.8. deliberately undermining or refusing to accept the authority of supervisors;
  - 14.9. making offensive, insulting or demeaning comments to or about a person, including by sending such comments in emails or messages or posting them online; and
  - 14.10. spreading gossip or rumours.
15. Reasonable management of an Employee's performance or conduct or other reasonable management action carried out in a reasonable manner does not amount to bullying or harassment.

### **What is sexual harassment?**

16. “**Sexual harassment**” includes an unwelcome sexual advance, an unwelcome request for sexual favours or other unwelcome conduct of a sexual nature in relation to another person in circumstances where a reasonable person would anticipate that the person to whom the conduct is directed would or may be offended, humiliated or intimidated. It does not include conduct that is welcome, occurring within a personal relationship of mutual attraction and/or friendship.
17. Sexual harassment may occur in a single incident or a series of incidents. The harassment may be subtle and implicit rather than explicit.
18. Sexually harassing behaviour may include (but is not limited to) unwelcome:
- 18.1. physical contact (eg. kissing, touching, patting or brushing against a person);
  - 18.2. demands or requests for sexual favours;
  - 18.3. offensive or demeaning comments of a sexual nature;
  - 18.4. jokes or innuendo of a sexual nature;
  - 18.5. sexual propositions or advances or requests for dates;
  - 18.6. offensive gestures;
  - 18.7. staring;
  - 18.8. displaying, sending, emailing or downloading offensive material; and
  - 18.9. questions, remarks, or insinuations about a person's sexual activities or private life.

### **Unlawful behaviours**

19. Workplace bullying or harassment (including sexual harassment) and unlawful discrimination are unlawful behaviours under State, Territory and Federal legislation, including the *Equal Opportunity Act 2010* (Vic), *Racial & Religious Tolerance Act 2001* (Vic), *Racial Discrimination*

*Act 1975 (Cth), Sex Discrimination Act 1984 (Cth), Age Discrimination Act 2004 (Cth), Disability Discrimination Act 1992 (Cth), Fair Work Act 2009 (Cth) and Crimes Act 1958 (Vic).*

20. Bullying, harassing or discriminatory behaviours may cause unacceptable risks to health and safety and contravene the duties owed under the *Occupational Health and Safety Act 2004* (Vic).

#### **The Company's approach to harassment and workplace bullying**

21. Workplace harassment or bullying is unacceptable. Bullying or harassing behaviours connected with work, even if occurring outside work hours or away from the Company's premises, will not be tolerated.
22. Any incident of harassment or bullying behaviour should not be ignored and should be dealt with in accordance with the procedures contained in this policy so that it may be addressed, and repeat conduct prevented.
23. Persons found to have engaged in bullying or harassing behaviour may be subject to disciplinary action (including potential termination of employment) and may face prosecution under legislation including the *Occupational Health and Safety Act 2004* (Vic) and the *Crimes Act 1958* (Vic).

#### **The Company's approach to discrimination and equal opportunity**

24. Unlawful discrimination is unacceptable. Discriminatory conduct occurring at or in connection with work may result in disciplinary action, including termination of employment. Discriminatory conduct may also amount to a criminal offence, may be reported to the police and may result in fines, or even imprisonment.
25. The Company provides equal opportunity towards applicants for employment and their current Employees in accordance with Federal and State legislation. The Company does not unlawfully discriminate against Employees or applicants for employment in relation to employment decisions such as:
  - 25.1. hiring;
  - 25.2. setting terms or conditions of employment;
  - 25.3. promotion or training opportunities; or
  - 25.4. dismissal.
26. The Company will endeavour to consistently employ capable people to manage and work in its business in a safe and profitable manner. This allows all people employed by the Company to utilise their skills to their fullest potential, with the pathway to achieving the highest position possible.

#### **Employee responsibilities under this policy**

27. Employees must not:
  - 27.1. unlawfully discriminate against any person at or in connection with work;
  - 27.2. subject any other person to bullying or harassing behaviour at or in connection with work;
  - 27.3. victimise anyone involved in a complaint or investigation of discrimination, harassment or bullying; or

- 27.4. make a vexatious or knowingly false complaint of bullying, harassment or discrimination.

#### **Management responsibilities under this policy**

28. The CEO is responsible for implementing and enforcing this policy as well as:
  - 28.1. ensuring that all Employees are made aware that unlawful discrimination, harassment, and bullying are strictly forbidden; and
  - 28.2. acting on matters brought to the CEO's attention in accordance with the discretions and procedures set out in this policy.

#### **Preliminary procedure if discriminated against, bullied or harassed**

29. Employees have the right not to be unlawfully discriminated against or harassed or bullied in the workplace and that right will be supported by the Company.
30. An affected employee who reasonably believes that he or she has been unlawfully discriminated against, or harassed or bullied at work by another person (**the other person**) should take the following steps:
  - 30.1. Tell the other person directly to stop the conduct, if the affected employee feels comfortable doing so.
  - 30.2. If the other person's behaviour or attitude does not change, or the affected employee feels uncomfortable raising the issue directly, the affected employee should discuss the matter with the CEO.
  - 30.3. If the matter is raised with the CEO, options for addressing the situation will be discussed with the affected employee with the aim of resolving the issue.
  - 30.4. If the situation is not resolved as a result of the above steps or the incident is of a serious nature, the affected employee may make a formal complaint in accordance with the procedure set out below.
31. If the complaint directly involves the CEO, the preliminary procedure above and the formal procedure below apply as if any reference to the CEO is a reference to the Chairman of the Board of the Employee's employer. If the complaint relates to member of the Board, that Board member will not take part in any investigation or decision making in relation to the complaint.

#### **Formal complaint procedure if discriminated against, bullied or harassed**

32. To initiate the formal complaint procedure, the affected employee is required to submit a formal complaint to the CEO in writing, setting out the circumstances of the alleged incident or incidents (including all relevant details, such as dates, locations, details of the conduct alleged and the names of the other person and any potential witness(es) to the alleged conduct).
33. In fairness to all concerned, and to minimise the risk of repeat behaviour occurring, a formal complaint should be made as soon as possible after the alleged incident. Complaints about behaviour occurring a long time ago are difficult to investigate fairly and the CEO may determine that a complaint is too old to be properly or fairly investigated. Without limitation, a complaint about behaviour that occurred more than 12 months prior to the date of the written complaint is unlikely to be investigated.

34. After a written complaint is submitted the following steps will occur:
- 34.1. The CEO will consider the complaint and decide whether or not an investigation is appropriate in the circumstances. An investigation may not be considered appropriate if (for example):
- 34.1.1. there has been delay in the complaint being made which is likely to adversely affect the fairness or reliability of the investigation; or
  - 34.1.2. the CEO believes the complaint is vexatious or knowingly false;
  - 34.1.3. the CEO believes that the conduct alleged would not (if substantiated) amount to bullying, harassing or discriminatory behaviour; or
  - 34.1.4. the alleged behaviour has already been investigated or dealt with, or there is no real risk of the alleged behaviour being repeated or continuing at or in connection with work.
- 34.2. If the CEO determines that an investigation is appropriate, the CEO may investigate the matter personally or appoint a delegate or an external investigator to investigate the complaint, using the following procedure.

#### **Investigation procedure**

35. The CEO or appointed investigator will interview the affected employee about the matter. The affected employee may bring an independent support person to the interview.
36. A summary of the complaint will be provided to the other person and he or she will be given an opportunity to respond to the complaint in an interview with the CEO or appointed investigator. The other person may bring an independent support person to the interview.
37. Where there is a dispute over facts, the CEO or appointed investigator may gather statements from witnesses, relevant documents or such other relevant evidence as is considered appropriate. The CEO or appointed investigator may make findings concerning disputed facts if he or she considers there is sufficient evidence to do so or may, where appropriate, form a view that alleged facts are not able to be substantiated by reasonably available evidence.
38. The CEO may make a decision as to the outcome of the investigation conducted by the CEO or an appointed investigator if the CEO considers it appropriate to do so, or may determine that the CEO or appointed investigator will instead report to the Board of Indepet (as the CEO considers appropriate in the circumstances) in relation to the investigation.
39. A report to the Board may contain any information the CEO or appointed investigator considers necessary or relevant to the outcome of the investigation, and may include a summary of the investigation process, the evidence and the findings, and may include recommendations as to whether or not the complaint is substantiated on the available evidence, and as to any outcome recommended by the CEO or appointed investigator.
40. Where a report is provided to the Board, the Board will consider the report, and make a decision as to the outcome of the investigation. The Board is not obliged to adopt any recommendations contained in the report and may take such steps to resolve the matter as are considered reasonably appropriate in the circumstances.
41. The affected employee and the other person will be notified whether or not the complaint has been found to be substantiated and may be provided with additional information at the discretion of the Board or CEO, but will have no entitlement to receive a copy of any report or documents prepared or gathered for the purpose of the investigation, or to be informed of the



reasons for any decision of the CEO or Board or of any disciplinary or other action taken. A complaint may be found to be unsubstantiated due to a lack of independent evidence.

42. Employees who are involved in an investigation or complaint must co-operate with the CEO or investigator and should not do anything which is likely to prejudice, hinder or unreasonably delay the investigation process. Employees involved in a complaint or investigation procedure under this policy should keep the matter confidential and should not discuss the matter with other Employees or third parties (except any legal advisers appointed by them) without prior authorisation of the CEO.
43. The procedures contained in this policy do not limit the affected employee's ability to refer any complaint to an external body having authority to deal with such complaints.

#### **Disciplinary action**

44. Disciplinary action may be taken by an Employee's employer if bullying, harassing or discriminatory behaviour is found to have occurred, whether or not a complaint has been made, and whether or not the behaviour has been repeated. Disciplinary action may include termination of employment.
45. If a complaint of bullying, harassment or discrimination is found to be unsubstantiated, appropriate steps may be taken at the discretion of the relevant Employee's employer, for example, to counsel any person involved in the complaint or investigation and/or to remind any person of their obligations and/or the employer's expectations.

#### **Vexatious or false complaints**

46. Disciplinary action may be taken against an Employee if the Employee makes a vexatious or knowingly false complaint of bullying, harassing or discriminatory behaviour, which may include termination of employment.

#### **Victimisation**

47. Victimisation of any Employee who makes a genuine complaint or report of discrimination, bullying or harassment of any kind is unlawful and will not be tolerated.
48. Disciplinary action may be taken against any Employee who victimises or retaliates against a person who has made a complaint of discrimination, bullying or harassment, or against any person who is involved in a complaint or investigation of a complaint of discrimination, bullying or harassment.

The Company reserves the right to amend this policy at their discretion. In case of amendments, Employees will be informed as soon as possible.

## ELECTRONIC USE AND COMMUNICATION POLICY

### Application of policy

1. This policy applies to all employees of Indepet Limited (**Indepet**) (**Employees**).
2. In this policy, **Company** means Indepet and **Management** means the CEO of Indepet Ltd or the CEO's nominated representative.
- 3.

### Policy objective and scope

4. This policy is intended to protect the Company and Employees from potential legal liability and to assist Employees to understand and comply with the Company's expectations and requirements for use of the internet, computer facilities, electronic devices and systems in connection with work.
5. Other Company policies, including the Company's Bullying, Harassment and Equal Opportunity Policy and Employees' obligations under applicable discrimination, harassment and occupational health and safety legislation also apply to online behaviour.
6. Employees should be aware that a breach or failure to comply with this policy may result in disciplinary action including termination of employment. The Company may seek to recover any costs incurred by any of them as a result of a breach of this policy by an Employee. The Employee may also be personally liable if the law is broken in respect of any matters set out in this policy.

### Electronic security and privacy

7. Employees may be provided with or required to set passwords (including PINs or passcodes) on the Company computers, systems, electronic devices or associated accounts. Employees must provide any password which is necessary to access any account, information or content on any of the Company's computers, electronic systems, devices or associated accounts to the CEO on request. Passwords otherwise must not be disclosed to anyone without the CEO's authorisation, and Employees must protect the secrecy of passwords and the security of Indepet's electronic data at all times.
8. The use of a password on any computer, electronic system, electronic device or associated account, does not provide Employees with any right or expectation of privacy in any content stored using that device, system or account.
9. By accessing and using the Company's computers, electronic systems, electronic devices and/or associated accounts, Employees are taken to consent to and authorise management to access any files or data created, accessed, stored or saved using the Company's computers, electronic systems, devices or associated accounts, including the content of emails. Management may access such information or data at any time, including if it appears to management to be necessary in order to ensure compliance with legal requirements or this policy.
10. Employees waive any right of privacy in anything they create, access, store, send or receive on any of the Company's computers, electronic systems, electronic devices and associated accounts and as such, should not use them to send, receive or store

information that they wish to keep private. The Company can, but is not obliged to, monitor emails and usage of electronic devices and accounts without prior notification. If there is evidence that an Employee is not adhering to the guidelines set out in this policy, or is using any computer, electronic system, electronic device or associated account in a manner contrary to the Employee's duties or the interests of the Company, the Company may take disciplinary action, including termination of employment and/or legal action.

### **External equipment, hardware and software**

11. Any electronic device or hardware including storage devices of any nature should not be connected to the Company's network(s) or any of the Company's computers under any circumstances without prior approval of management. This includes hand-held devices, portable disc drives, external computers, or smart mobile phones.
12. Employees may not install any software or hardware to any of the Company's computers or networks without first receiving express permission from management.

### **Email policy**

13. Email is used as a business communication tool and Employees are required to use this tool in a responsible, effective and lawful manner. It is important that Employees are aware of the legal and practical risks of email and apply the guidelines of this policy and common sense to the use of email to minimise those risks. Failure to comply with these guidelines or improper use of email may result in disciplinary action, including termination of employment.
14. Employees should be aware that email can be subject to court orders for production as evidence in legal proceedings.

### **Legal Risks**

15. The legal risks associated with emails include that:
  - 15.1. email can be subject to court orders for production as evidence in legal proceedings and should be regarded as permanent records;
  - 15.2. sending or forwarding emails containing defamatory, discriminatory, bullying, harassing, offensive, racist or obscene remarks or other unlawful content, may result in liability for an Employee and/or the Company;
  - 15.3. forwarding, copying or disseminating confidential information or intellectual property may result in liability for an Employee and/or the Company.
  - 15.4. opening or sending emails, links or attachments that contain a virus or malicious software may result in damage and associated legal liability.

### **Legal Requirements**

16. Without limiting the need to follow general guidelines and apply a common sense approach to email use, the following legal requirements must be strictly adhered to. It is prohibited to:

- 16.1. send or forward emails containing defamatory, discriminatory, bullying, harassing, offensive, racist or obscene remarks or other unlawful content. If an Employee receives an email of this nature, the Employee must promptly inform management.
- 16.2. forge or attempt to forge email messages.
- 16.3. disguise or attempt to disguise your identity when sending email.
- 16.4. send email messages using another person's email particulars or account.
- 16.5. copy or use intellectual property comprised in a message or attachment belonging to another user without permission of the originator.

### **Email practice**

- 17. The Company views email as an important means of communication and recognise the importance of proper email content and prompt replies in conveying a professional image and delivering good customer service.
- 18. The Company's email system is supplied and intended to be used primarily as a business tool. The sending of personal emails, chain letters, junk mail, jokes, sexually explicit material, games or program files is not permitted.
- 19. The following guidelines should be adhered to at all times:

#### **Writing Emails**

- 19.1. Employees should take the same care in drafting an email as they would for any other written communication. Emails should be drafted using professional, respectful and courteous language.
- 19.2. Emails should not give the impression an Employee is representing, giving opinions or otherwise making statements on behalf of the Company, or creating any obligation on behalf of the Company, unless the Employee is expressly authorised to do so.

#### **Signatures**

- 19.3. Employees must clearly identify themselves in all emails.

#### **Confidential information**

- 19.4. As email is not a secure medium, care should be taken when sending any confidential information by email. If an Employee is in doubt as to whether it is appropriate to send certain information via email, the Employee should check this with management before sending the email.
- 19.5. Employees must not transmit sensitive or confidential information to a personal email address or other email address without prior written authorisation by management.

## **Internet usage**

20. Access to the internet is supplied as a business information tool and Employees are required to use this tool in a responsible, effective and lawful manner. The Company reserve the right to monitor or audit internet use by Employees.
21. The Company prohibits the use of their internet facilities, devices, computers or systems to upload, download, access or store any information or content that is sexually explicit, racist, offensive, discriminatory, bullying, harassing or unlawful.
22. Employees are not permitted to use the internet to create legal or contractual obligations for or on behalf of the Company unless specifically authorised to do so.

## **Content**

23. It is important that Employees remain transparent in relation to their affiliation with the Company and distinguish personal opinions from opinions of the Company when using the internet. For instance, if an Employee publishes any content to an external website which has a connection with the Employee's work or profession but is not authorised to be written on behalf of the Company, the Employee should use a disclaimer such as "*The postings on this site are my own personal views and are not made or authorised to be made on behalf of Indepet.*"
24. Employees must not publish any confidential, private or proprietary information of the Company or their clients, suppliers, shareholders or business partners nor disclose other Employees' personal information.
25. Employees must not publish any content which could cause damage to the reputation of the Company, Directors, related entities, employees, officers, clients, suppliers or shareholders.
26. Employees should be respectful of the opinions of others and must not post or link any materials that are defamatory, harassing, discriminatory, offensive, insulting, bullying, threatening, hateful or indecent.

## **Care in posting**

27. Everything written on the internet can be traced back to its author through a range of methods and electronic data is often recoverable even once deleted by the author. It is also common for content to be copied and reposted on the internet without the author's knowledge, and once content is posted online, it can be impossible for it to be removed from the public arena.
28. Employees are required to take these factors into account when using the internet, including social media, and to have regard to the potential for such content to be copied, re-published, accessed or used by others and consider any potential impact on the interests of the Company.
29. Employees are encouraged to pause before publishing content on the internet and to consider the possible implications of the content being posted. It is the Employees' responsibility to ensure that any content posted online is appropriate.

## **Social media**

- 30. Employees should be aware that online social media can share a connection with the workplace, either intentionally or unintentionally.
- 31. For the purpose of this policy, “**social media**” includes (but is not limited to):
  - 31.1. multimedia and social networking websites such as Facebook, My Space, Yahoo Groups, YouTube, LinkedIn, Twitter and other similar sites;
  - 31.2. blogs; and
  - 31.3. Wikis such as Wikipedia and any other site where text can be posted.
- 32. The Company requires Employees to be aware of the potential crossover between work and personal use of social media and be aware that use of social media may impact on the Company and the Employee’s employment.

## **Access at work**

- 33. Employees are not permitted to access social media using the Company’s equipment without express written consent of management.

## **Connection to work**

- 34. There is not always a clear distinction between an Employee’s conduct in his or her personal life and work life. Even though content may be published by an Employee outside of work hours or away from the physical workplace does not mean there will not be a connection with, or impact on, the Employee’s employment with the Company. For example, communications between Employees or references on social media to the Company, its’ related entities, officers, employees, clients, shareholders or suppliers (whether or not by name) or to incidents occurring at work, occurring either during or outside work hours may be treated as an employment issue for which an Employee may be disciplined, including by having his or her employment terminated.

## **Recording devices**

- 35. Employees are expected to be frank, honest and open in their dealings with others in the course of their employment. Mobile phones or other recording devices (whether provided by the Company or privately owned) must not be used to record any conversation or interaction with any other person at or in connection with work (including by recording audio, video, or by transcription) unless all other parties to the conversation or interaction know the recording is being made, and have consented to the recording being made.

The Company reserves the right to amend this policy at their discretion. In case of amendments, Employees will be informed as soon as possible.

## GRIEVANCE HANDLING POLICY

### Application of policy

1. This policy applies to all employees of Indepet Limited (**Indepet**) (**Employees**).
2. In this policy:
  - 2.1. **Company** means Indepet
  - 2.2. an Employee who has a workplace grievance is referred to as the **affected employee**; and
  - 2.3. **management** means the CEO of Indepet or the CEO's nominated representative.

### Policy objective and scope

3. The Company recognises the importance of dealing with disputes or grievances within the workplace promptly, fairly and co-operatively, without disruption to work or disharmony in the workplace.
4. Complaints about bullying, harassment or discrimination are to be dealt with in accordance with the procedure set out in the Company's Bullying, Harassment and Equal Opportunity Policy. This policy and the internal grievance procedure set out below applies to all other Employee grievances related to the work environment, including grievances relating to management decisions, administrative issues, workplace safety, personality clashes or any act or omission in the workplace that an employee believes is unfair, unlawful, or unjust.

### General principles

5. Employees are expected to:
  - 5.1. maintain professional working relationships with colleagues;
  - 5.2. communicate with each other openly, honestly and fairly;
  - 5.3. work together co-operatively; and
  - 5.4. attempt to resolve conflict in the workplace at a local level promptly, informally and co-operatively wherever possible.
6. The Company's resources are limited, and it is expected that trivial or minor disputes will be resolved by Employees without undue need for involvement of senior decision makers wherever possible. Management may refuse to act on a complaint or a grievance at any stage if a grievance appears to be frivolous, trivial or vexatious, has already been dealt with, or if a separate process has been or is being used to deal with the grievance.
7. Employees against whom a complaint or allegation is made may request to be accompanied by a support person at any meetings in relation to a workplace grievance and such a request will not be unreasonably refused.
8. Management are not obliged to inform any Employees complaining of a grievance of the nature of any disciplinary or other action taken to resolve the grievance or the reasons for any decisions or recommendations made.

## Confidentiality and record keeping

9. Employees who have a workplace grievance, or who are involved in grievance procedure, should not discuss the grievance with other Employees or persons within or outside the workplace other than in accordance with this policy and should keep matters raised or discussed during the course of the grievance procedure confidential.
10. Inappropriate discussion of grievances outside the grievance procedure may be harmful to working relationships and the Company's business or reputation and may result in disciplinary action being taken against the Employee(s) involved.
11. Copies of any written correspondence or documents relating to a grievance and written records of any meetings or interviews conducted as part of the grievance procedure may be kept and placed on the relevant Employee's confidential personnel file for a specified or indefinite period of time as determined by management.
12. Nothing in this policy is intended to limit or detract from any right of the Company or their employee to obtain confidential legal or other advice from external advisors, or to exercise legal rights which they otherwise have to seek external resolution of a workplace grievance.

## Grievance procedure

13. In fairness to all concerned, a genuine grievance should be raised as soon as possible. Grievances about behaviour occurring a long time ago are difficult to investigate and the CEO may determine that a grievance is too old to be properly or fairly dealt with or investigated. Without limitation, a complaint about behaviour that occurred more than 12 months prior to the date of the written complaint will not be investigated.

### Stage 1.

14. If a grievance relates to another Employee and it is appropriate to do so in the circumstances, the affected employee should raise the grievance directly with the person concerned (**the relevant employee**) and attempt to resolve the issue by informal discussions with the relevant employee.
15. Any Employee asked to discuss a grievance is required to co-operate in attempting to resolve the dispute amicably.

### Stage 2

16. If direct discussions with an individual are not appropriate in the circumstances or do not resolve the grievance, the affected employee should notify the CEO about the grievance. If the grievance directly involves the CEO, the affected employee should notify a director of the Employee's employer and all reference to the CEO below are taken to be references to that director or his/her nominee appointed for the purpose of this procedure.
17. The CEO will meet with the affected employee and attempt to resolve the matter by discussion with the affected employee. The CEO may suggest options for resolving the grievance or consult with such other persons as the CEO considers necessary to attempt to promptly resolve the grievance.
18. The CEO may take any steps he or she considers likely to be useful in attempting to resolve the grievance, including to:
  - 18.1. require the affected employee to state in writing the grievance, any facts or allegations on which the grievance is based and any remedy sought;
  - 18.2. meet with the affected employee and any other person directly involved in the grievance (either separately or together);



- 18.3. provide any parties involved in the grievance with a reasonable opportunity to provide information or documents relevant to the dispute;
  - 18.4. take such steps to inform himself or herself about the grievance as he or she considers to be necessary;
  - 18.5. seek external advice or opinion in relation to the grievance;
  - 18.6. if he or she considers it to be appropriate in the circumstances, provide the affected employee and any other persons directly involved in the dispute with an opportunity to consider and respond to relevant information provided by any other party to the grievance;
  - 18.7. discuss with the parties to the grievance options for resolution;
  - 18.8. make recommendations to the parties for resolution of the grievance; and/or
  - 18.9. take such action to resolve the grievance as he or she considers to be reasonable and appropriate in the circumstances, including by consulting with one or more members of the Board of Directors of the Company, referring the grievance to the Board, or making recommendations for disciplinary or other action to the Board.
19. The CEO is not obliged to take any step the CEO does not consider to be reasonable or likely to assist in resolving the grievance.

The Company reserve the right to amend this policy at its discretion. In case of amendments, Employees will be informed as soon as possible.

## MOBILE PHONE POLICY

1. This policy applies to all employees Indepet Limited (**Indepet**) (**Employees**).
2. In this policy:
  - 2.1. **Company** means Indepet; and
  - 2.2. **Management** means the CEO of Indepet or the CEO's nominated representative.
3. This policy deals with issues specific to mobile phones, however Employees should be aware that other policies of the Company, including the Company's Electronic Use and Communications Policy also apply to mobile phones.
4. Employees should be aware that a breach or failure to comply with the terms of this policy may result in the withdrawal of benefits provided to the Employee in accordance with this policy and may result in disciplinary action including termination of employment.

### Provision and purpose of mobile phones

5. The Company may from time to time provide or pay for use of a mobile phone by an Employee. In this policy, references to providing or paying for a mobile phone include providing or paying for the mobile phone itself, providing or paying for use of a mobile phone plan or network and/or paying for charges associated with use of the mobile phone.
6. Where use of a mobile phone is provided or paid for by the Company, the purpose is to ensure that the Employee is able to be contacted, able to conveniently contact others and otherwise able to use the mobile phone as necessary for business purposes.
7. It is expected that where use of a mobile phone is provided or paid for by the Company, the mobile phone will be kept switched on and available for incoming calls and messaging (including SMS and emails) at all reasonable times.

### Data storage, monitoring and security

8. Mobile phones can store significant quantities of commercially sensitive, valuable or confidential information and need to be cared for responsibly and kept secure by Employees. Employee's obligations in relation to the confidentiality and security of information belonging to the Company extends to any data or information stored on a mobile phone.
9. The Company may, but are not obliged to, monitor use of mobile phones provided or paid for by the Company, including call, email and data usage, and may access and deal with any information stored, created, sent or received using a mobile phone provided or paid for by the Company.
10. A passcode/password must be enabled on any mobile phone provided by the Company, to protect against unauthorised access by third parties. The passcode/password for any mobile phone provided by the Company must be notified to management and must not be disclosed to any other person without written authorisation from management.
11. Data or information belonging to any of the Company which is created or stored on a mobile phone may only be copied or backed up by Employees to accounts and/or devices which are known to, authorised by and accessible to the Company. Copies or backups of mobile phone data may be stored to an electronic account linked to the Employee's work email address, which will belong to the Company, and/or to a computer used by the Employee which is owned by the Company and kept at the Company's premises. Copies or backups of mobile phone data must be secured using a password or passcode, and the password or passcode must be notified to management. The Company retains ownership of any information or data copied or backed up by an Employee and may access and deal with that information and data as they

see fit. Employees must notify the Company of the location of any copies or back-ups of mobile phone data and must provide the Company with the means to access and deal with that data, including by providing any necessary physical access, account details and/or passwords or passcodes.

### **Loss or Damage**

12. If a mobile phone provided or paid for by the Company is lost, stolen or damaged, the Employee should notify management immediately. Measures may be taken by the Company to remotely wipe or block the phone from use.
13. From time to time repairs, upgrades or software updates to mobile phones provided by the Company may be arranged by the Company. Employees are required to ensure that any mobile phone provided by the Company is made available to the Company on request.
14. If a mobile phone provided by to the Company is damaged or lost, it may be repaired or replaced at the Company's discretion, however the Company are under no obligation to repair or replace a lost or damaged mobile phone. Employees are responsible for ensuring that any mobile phones provided by the Company is kept secure and safe and are maintained in good working order and condition, fair wear and tear excepted. An Employee will be responsible for the cost of repairing or replacing a mobile phone which is damaged or lost due to carelessness, negligence, or intentional misuse by the Employee.

### **Ownership of mobile phone and associated equipment and telephone numbers**

15. Mobile phones and associated equipment, software, accounts and phone numbers provided for use by Employees are and remain the property of the Company and must be returned to the Company on request, or on termination of employment, unless an alternative arrangement is agreed between the Company and the Employee.
16. If an Employee transfers a privately owned mobile phone number to a mobile phone account of the Company, the phone number will become an asset of the Company and remain the property of the Company unless otherwise agreed between the Company and the Employee, including in the event the Employee's employment ends.

### **Personal use**

17. Reasonable incidental personal use of a mobile phone provided by the Company is permitted, however Employees are responsible for monitoring and ensuring that their personal use of a mobile phone provided or paid for by the Company is not excessive or unreasonable, and does not result in unreasonable or excessive cost or hinder the Employee's work or productivity.
18. An Employee will be responsible for payment of costs associated with personal use of a mobile phone provided by the Company if the Company considers that use to be excessive or unreasonable. Employees may be advised from time to time of limits or restrictions on permitted personal use of mobile phones provided or paid for by the Company and must comply with any such limits.

### **Improper or unlawful use**

19. Any penalty or infringement incurred by an Employee as a result of unlawful or improper use of a mobile phone is the responsibility of the Employee. Improper or unlawful use of a mobile phone provided or paid for by the Company (including use which is contrary to the terms of this, or other policies of the Company) may result in disciplinary action.

### **International use**

20. The cost of international calls or data usage can be substantial and mobile phones provided or paid for by the Company should not be used outside Australia without express authorisation.

International roaming or data use should not be enabled on the Company's mobile phones (and this should be checked prior to departing Australia) unless this is authorised by the Company and necessary for business purposes.

21. Employees will be responsible for payment of the cost of any personal calls made or received outside Australia, and any personal or otherwise unauthorised data usage outside Australia.

The Company reserve the right to amend this policy at their discretion. In case of amendments, Employees will be informed as soon as possible.

## OCCUPATIONAL HEALTH & SAFETY POLICY

### Application of policy

1. This policy applies to all employees Indepet Limited (**Indepet**) (**Employees**).
2. This policy also applies to any other person who performs work for, or provides services to or for the Company from time to time (whether or not on behalf of any third party) in relation to the work or services performed or provided by them in connection with the Company including any work or services performed or provided at the Company's workplace.
3. In this policy:
  - 3.1. **Company** means Indepet.
  - 3.2. **management** means the CEO of Indepet or the CEO's nominated representative, or (in relation to any matter requiring immediate attention) if he or she is not available, a member of the Board of Indepet;
  - 3.3. **relevant Company** means, in the case of Employee, the Employee's employer, and in the case of a worker other than an Employee, the Company the worker is engaged to perform work for or provide service to at the relevant time;
  - 3.4. **worker** includes an Employee and any other person referred to in paragraph 2 of this policy.

### Policy objective and scope

4. The Company recognise that they have obligations to provide and maintain healthy and safe workplaces for their workers, as far as is reasonably practicable, and to take reasonable steps to ensure that persons other than their respective workers are not exposed to risks to their health and safety arising from the conduct of their respective undertakings.
5. The Company also recognises that promoting health and safety in the workplace is most effective when jointly implemented and adhered to by the Company and its workers.

### The Company's responsibilities

6. The Company's responsibilities under this policy are to:
  - 6.1. implement and carry out this policy in their respective workplaces;
  - 6.2. comply with the *Occupational Health and Safety Act 2004* and all other applicable legislation in relation to health and safety relating to their respective workplaces and undertakings;
  - 6.3. provide instruction to their respective workers in relation to health and safety procedures and company requirements; and
  - 6.4. keep records relating to workplace accidents affecting their respective workers.

### Worker's duties

7. Employees have duties under the *Occupational Health and Safety Act 2004* including to:
  - 7.1. take reasonable care for their own health and safety;

- 7.2. take reasonable care for the health and safety of others who may be affected by their acts or omissions at a workplace;
  - 7.3. co-operate with their employer with respect to any action taken by the employer to comply with a requirement imposed by the Occupational Health and Safety Act or Regulations;
  - 7.4. not intentionally or recklessly interfere with or misuse anything provided at the workplace in the interests of health, safety or welfare.
8. Contractors and self-employed persons have duties under the *Occupational Health and Safety Act* 2004, including to provide and maintain working environments that are safe and without risk to health of their employees and contractors, and to ensure, so far as it reasonably practicable, that others are not exposed to risks to their health and safety arising from the conduct of their undertakings.
9. Similar duties apply under work health and safety legislation in force in other Australian jurisdictions.
10. All workers have responsibilities under this policy to:
- 10.1. comply with all applicable legislation and codes of practice in relation to occupational health and safety;
  - 10.2. comply with this policy and all other health and safety procedures established and implemented by the Company, as well as follow any lawful directions issued by the Company in relation to health and safety;
  - 10.3. avoid risks to their own health and safety;
  - 10.4. ensure the health or safety of others (including fellow workers) is not put at risk;
  - 10.5. refrain from interfering with or misusing any items in the workplace which are for the purposes of promoting health and safety;
  - 10.6. obey all safety warnings (including signs or labels) within the workplace at all times;
  - 10.7. present themselves to work in a fit state to work safely at all times;
  - 10.8. report to management any adverse health and safety incidents, and any risks to health or safety observed by the worker.

### **Incident reporting procedure**

11. Any enquiry or complaint about health and safety in the Company workplace should be made or notified to management.
12. All workers are required to follow the incident reporting procedure set out below with respect to all accidents or incidents affecting health or safety (including near misses), dangerous occurrences and hazards:
- 12.1. report the incident to management immediately;
  - 12.2. record the incident in the Company accident and hazard register, or if any injuries are sustained in the register of injuries; and
  - 12.3. where an injured worker is in need of urgent medical assistance, the first employee on the scene of the accident or incident should telephone emergency 000 and

request an ambulance, or in the cases of minor injuries, should contact the relevant Company and request the attendance of a first aid officer.

### **Serious incident, dangerous occurrences and accidents**

13. All serious incidents and dangerous occurrences set out in Part 5 of the *Occupational Health and Safety Act 2004* are to be notified to management who will then inform WorkSafe if required.
14. **Serious incidents** include:
  - 14.1. the death of a person;
  - 14.2. a person requiring medical treatment within 48 hours of exposure to a substance;
  - 14.3. a person requiring medical treatment as an inpatient in a hospital;
  - 14.4. a person requiring medical treatment for:
    - 14.4.1. the amputation of any part of a person's body;
    - 14.4.2. a serious head injury;
    - 14.4.3. a serious eye injury;
    - 14.4.4. separation of skin from underlying tissue;
    - 14.4.5. electric shock;
    - 14.4.6. a spinal injury;
    - 14.4.7. the loss of a bodily function;
    - 14.4.8. a serious laceration; or
    - 14.4.9. any other injury to a person or other consequence prescribed by the Occupational Health and Safety Regulations 2007.
15. **Dangerous occurrences** include any incident that exposes a person in the immediate vicinity to an immediate risk to that person's health and safety through:
  - 15.1. the collapse, overturning, failure or malfunction of, or damage to, any item of plant that the *Occupation Health and Safety Regulations 2007* prescribe must not be used unless the plant is licensed or registered;
  - 15.2. the collapse or failure of an excavation or of any shoring, supporting an excavation;
  - 15.3. the collapse or partial collapse of all or part of a building or structure;
  - 15.4. an implosion, explosion or fire;
  - 15.5. the escape, spillage or leakage of any substance including dangerous goods as defined in the *Dangerous Goods Act 1985*;
  - 15.6. the fall or release from a height of any plant, substance or object;
  - 15.7. any other event in circumstances prescribed by the *Occupation Health and Safety Regulations 2007* as an event to which Part 5 of the *Occupational Health and Safety Act* applies.

## **Accidents**

16. Workers must not interfere with or disturb any accident site, unless essential to protect the health and safety of a person, aid an injured person involved in an incident or to take essential action to make the site safe or prevent a further occurrence of an incident. It may be necessary to report the accident or incident to WorkSafe who will appoint an inspector to inspect the site.

## **Health and safety requirements**

### **17. Floors and walkways**

- 17.1. Workers must keep their work areas clean, tidy and safe.
- 17.2. All floors and walkways (including stairs) should be kept free of obstructions and trip hazards, including electrical leads or cables.
- 17.3. All surfaces should be kept clean and dry to prevent slipping, or where a potential slipping hazard exists, a temporary warning sign be placed near the hazard to warn oncoming persons.
- 17.4. Workers should use designated walkways and unless authorised to do so, refrain from entering areas of the workplace which have motor vehicles or plant operating.

### **18. Storage**

Goods must be stacked and stored safely at all times in order to prevent the goods from falling. Storage should be arranged to minimise lifting as well as ensure easy access free of obstructions.

### **19. Heavy lifting**

Workers are not to attempt lifting any goods on their own which would ordinarily require two or more persons or if there is a foreseeable risk the worker will sustain injury.

### **20. Use of Equipment and Machinery**

- 20.1. If a worker become aware of any fault or defect (or potential fault or defect) with any piece of equipment or machinery, the worker must:
  - 20.1.1. immediately cease using that piece of equipment or machinery;
  - 20.1.2. ensure that the piece of equipment or machinery is conspicuously signed or tagged as having a potential fault or defect;
  - 20.1.3. notify management of the potential fault or defect; and
  - 20.1.4. record the incident in the Company logbook or incident register.

### **21. Smoking, drugs and alcohol**

- 21.1. The Company maintains a smoke-free workplaces. Smoking inside the Company's building or vehicles is strictly prohibited.
- 21.2. Workers are not permitted to consume or use alcohol or illegal drugs at work (except as provided for in paragraph 21.6) or during work times and are not permitted to attend work whilst adversely affected by illegal drugs or alcohol.



- 21.3. Workers should be mindful that consumption or use of drugs (including illegal drugs, prescription drugs and over the counter medication) or alcohol outside working hours or away from work may have an adverse effect on the health and safety of themselves or others at work, and may impact adversely on their employment or engagement with the Company.
- 21.4. No illegal drugs or alcohol may be present in a worker's body at any time the worker drives any vehicle for work purposes or in connection with work for the Company.
- 21.5. Workers must follow all instructions for the safe use of prescription drugs or over the counter medications, including any instructions or medical advice relating to dosage, use or operation of vehicles or other equipment while taking medication.
- 21.6. From time to time, workers may attend social or other functions related to work where consumption of alcohol is permitted. Workers should be mindful of the risks alcohol consumption may present to the health and safety of themselves or others, including as a result of unacceptable or offensive behaviour, and limit their alcohol consumption at such functions to reasonable levels. No worker should feel obliged to consume alcohol at any work or social function and non-alcoholic options will be made available at events or functions arranged by the Company. If a worker decides to consume alcohol at a work function, the worker must ensure that they do not drive afterwards if it is not safe or legal to do so, and should make arrangements for safe alternative transport.

#### **Medical assessments**

- 22. From time to time, the Company may require Employees to undergo medical testing or assessment in order to comply with their obligations under occupational health and safety laws. Where a direction is given to an Employee to attend or undergo medical testing or assessment for a purpose associated with occupational health and safety requirements, the Employee must comply with that direction.

#### **Consequences of breach of this policy**

- 23. An Employee who fails to adhere to this policy, or applicable requirements under occupational health and safety legislation (including the *Occupational Health and Safety Act 2004*) may be subject to disciplinary action, including possible termination of employment.
- 24. A worker other than an Employee who fails to adhere to this policy, or applicable requirements under occupational health and safety legislation (including the *Occupational Health and Safety Act 2004*) may be required to cease work for the Company and any contract or arrangement for the provision of services or performance of work may be terminated.
- 25. A failure to comply with occupational health and safety legislation may also result in legal action being taken against a worker.

The Company reserves the right to amend this policy at their discretion. In case of amendments, workers will be informed as soon as possible.

## **PERSONAL PRESENTATION AND DRESS POLICY**

1. This policy applies to all employees of Indepet Limited (**Indepet**) (**Employees**). In this policy, **Company** means Indepet.
2. Employees of the Company are generally not required to wear a compulsory uniform to work (although branded polo shirts or other items of uniform may be required in certain circumstances) and are permitted to choose appropriate clothing to wear to work, provided that a clean, tidy and business appropriate standard of dress, personal presentation and hygiene must be maintained at all times.
3. The purpose of this policy is to ensure Employees are aware of and comply with the Company's general standards and expectations in relation to clothing, footwear, hygiene and personal appearance at work.

### **Clothing worn to work**

4. The following examples are not intended to be exhaustive but are intended to provide guidance to Employees as to acceptable and unacceptable standards of dress while working for the Company. The Company reserve the right to direct any Employee to change clothing or footwear worn to work, or to direct the Employee to leave the workplace, if the clothing worn by the Employee does not to meet the standards expected, or is considered inappropriate for work.

#### **Acceptable clothing**

- 4.1. Business-casual clothing is an accepted minimum standard of dress. Business casual clothing may include (for example) business-length dresses, tailored pants or slacks, business-length skirts, long or short sleeved collared shirts or smart polo shirts, tailored shorts, tailored knit-wear or cardigans, sports coats or jackets.
- 4.2. Skirts or dresses ending at, below or just above the knee are an appropriate minimum length for work. Shorts may be worn to work provided that they are an appropriate length, which should be no shorter than just above the knee. As a general rule, skirts, dresses or shorts should be long enough to cover the thighs when seated.
- 4.3. Clothing worn to work should be well fitting (neither too tight or baggy).
- 4.4. All items of clothing worn to work should be neat in appearance, and should be clean and ironed or pressed as appropriate to the item of clothing.
- 4.5. Employees should take into account the nature of the work being performed and the circumstances of that work when determining what to wear to work, including whether the Employee will be meeting with any shareholders, suppliers, clients or third parties that day.

#### **Unacceptable clothing**

- 4.6. Clothing depicting vulgar, insulting, inappropriate or offensive logos, words, symbols or images should not be worn at work.
- 4.7. Revealing or skin-tight clothing (such as mini-skirts, short dresses, leggings or revealing tops) and transparent items of clothing (such as see-through shirts or tops) should not be worn to work.
- 4.8. Underwear must not be visible at work.

- 4.9. Clothing worn to work should not have rips, holes, wrinkles, tears, stains or bad odours.
- 4.10. Jeans, denim skirts, exercise clothing, casual t-shirts, casual singlets, halter neck tops and similarly casual items of clothing should not be worn to work, except for casual dress days.

#### **Footwear**

- 5. Footwear worn to work should be safe, clean, polished, practical and appropriate to the work being performed and the environment in which it is being performed.
- 6. Open-toed shoes and heels may be worn by Employees in an office environment, but should not be worn if this is likely to unnecessarily create or increase a risk of injury to the Employee. Employees are encouraged to ensure that a practical, closed toe, flat soled pair of shoes is available for use at work when required.
- 7. Thongs are not acceptable footwear for work.

#### **Hygiene and personal presentation**

- 8. Employees are required to maintain a high standard of personal hygiene and a professional standard of personal appearance at work. This includes that:
  - 8.1. hair, face, hands and fingernails should be clean and tidy at all times.
  - 8.2. hands should be properly washed and dried after using the bathroom and after eating.
  - 8.3. appropriate steps should be taken to prevent and minimise unpleasant body odour and maintain fresh breath (particularly after eating, drinking or smoking).
  - 8.4. use of strong-smelling colognes and perfumes should be avoided.
  - 8.5. any wounds should be kept covered with an appropriate hygienic dressing or bandage.
  - 8.6. facial hair, if worn, should be neat and well groomed.
  - 8.7. make-up, jewellery and accessories are permitted to be worn, but should be reasonably conservative.
  - 8.8. body piercings, body art and tattoos should be covered by clothing where reasonably practicable.

#### **Attire at work functions**

- 9. When attending business or client functions such as daytime expos, branded uniform (including polo shirts with the Company's logo as appropriate) should generally be worn if available.
- 10. Some work functions or events may require a more formal or professional standard of dress than day to day work. If an Employee is unsure of the appropriate dress code or standard for a particular work or client function or event, the Employee should check the appropriate standard with the CEO before attending the event.

**ID cards and name tags**

11. ID cards or name tags may be provided for use by Employees, in which case they must be worn as directed.

**Non-compliance with policies**

12. Employees are expected to comply with the directions, guidelines and standards set out in the Company's policies and procedures and should be aware that failure to comply with policies or procedures may result in disciplinary action, which may include termination of employment.

The Company reserve the right to amend this policy at their discretion. In case of amendments, employees will be informed about them as soon as possible.

## VEHICLE POLICY

### Application of policy

1. This policy applies to all employees of Indepet Limited (**Indepet**) (**Employees**).
2. In this policy:
  - 2.1. **Company** means Indepet;
  - 2.2. **management** means the CEO of Indepet or the CEO's nominated representative.

### Policy objective and scope

3. From time to time, the Company may provide use of company vehicles to Employees, which may form part of an Employee's remuneration package or may be provided for temporary use by Employees (**company vehicle**).
4. A company vehicle is primarily to be used by the Employee in the course of his or her employment, however reasonable private use of a company vehicle provided to an Employee is allowed by the Company.
5. This policy covers all Employees provided with use of a company vehicle by the Company. This policy also covers all Employees, who may from time to time be required to use private vehicles for work purposes or in connection with work.
6. The aim of this policy is to ensure Employees understand and comply with the Company's expectations and requirements for appropriate, safe and legal use of company vehicle and private vehicles used for work purposes or in connection with work.

### Policy expectations

#### Compliance with safety expectations and road and driving laws

7. Any Employee operating a company vehicle at any time, or operating a private vehicle for work purposes or in connection with work, must adhere to all relevant State and Territory road legislation and driver licensing laws, including the *Road Safety Act 1986 (Vic)* and its related regulations and rules.
8. An Employee must notify management immediately if his or her licence is suspended, cancelled, becomes invalid, or if the status of the licence has changed and may have an impact on the Employee's ability to lawfully operate a company vehicle or a private vehicle used for work purposes or in connection with work. An Employee must produce his or her driver's licence at any time upon request by the Employee's employer.

#### Mobile phones

9. It is illegal in all Australian States and Territories to use a hand-held mobile phone while driving, including while a vehicle is stationary but not parked (including to make or receive calls, text, send or receive emails or use any other function on the phone). Employees must comply with all laws relating to use of mobile phones in vehicles and must not use a hand-held mobile phone whilst driving a company vehicle at any time or while driving a private vehicle for work purposes or in connection with work.
10. All company vehicles are fitted with bluetooth/hands-free kits. These kits are supplied to enable hands-free use of mobile phones only as permitted by road laws and only when reasonably necessary. Use of hands-free mobile phones while driving should be kept to an absolute minimum, and should not occur in heavy traffic, poor road conditions or bad weather.

Wherever possible, Employees should stop and park safely if it is necessary to use a mobile phone while in a vehicle.

### **Smoking, drugs and alcohol**

11. Smoking is strictly prohibited in, or near, all company vehicles.
12. Employees are strictly prohibited from operating:
  - 12.1. a company vehicle at any time; or
  - 12.2. a private vehicle for work purposes or in connection with work;

whilst any illegal drugs are present in the employee's body, or whilst the Employee's blood alcohol concentration exceeds the applicable legal limit. Without limitation, an employee must maintain a blood alcohol concentration reading under 0.05% at all times whilst operating a company vehicle or operating a private vehicle for work purposes or in connection with work.

13. Employees must follow all instructions for the safe use of prescription drugs or over the counter medications, including any instructions or medical advice relating to dosage, use or operation of vehicles. An employee must notify management if he or she is taking any prescription or over the counter medication which is likely to adversely impact on the employee's driving ability.

### **Damage or collisions**

14. If an employee (either during or outside of work), is involved in any accident, collision or misadventure involving a company vehicle, he or she must report the matter to management as soon as possible, in addition to any legal requirements about reporting accidents to police.
15. Employees are strictly prohibited from intentionally or recklessly damaging any company vehicle and are required to cooperate with police at the scene of any accident involving a company vehicle or a private vehicle being used for work purposes or in connection with work.
16. Employees are responsible for reporting any fault or other physical or mechanical damage to a company vehicle that the employee becomes aware of while the vehicle is in the employee's possession. An employee must not drive a company vehicle while it is in an unroadworthy condition.
17. Employees are responsible for ensuring that any private vehicle used for work purposes or in connection with work is registered, in a safe and roadworthy condition and covered by adequate insurance.
18. If an Employee is involved in an accident while operating a company vehicle, and the Company's motor vehicle insurer refuses to accept a claim for loss or damage to the company vehicle or any third party (for reasons contained in the insurance policy), the Employee will be liable to pay for the full cost of any loss or damage to the company vehicle and the loss or damage to any third party (if applicable).

### **Offences, infringements or penalties**

19. If an Employee, while operating a company vehicle or a private vehicle for work purposes or in connection with work, is alleged to have committed any offence, or incurs any driving infringements or penalties, including but not limited to:
  - 19.1. driving under the influence of alcohol or illicit drugs
  - 19.2. speeding

- 19.3. parking infringements
- 19.4. unlicensed driving or driving whilst disqualified
- 19.5. dangerous or careless driving;

the alleged offence, infringement, any demerit points and any fine or other pecuniary penalty will be the sole liability of the Employee. Upon receipt of any infringement notice or other notice of an offence, infringement or penalty relating to a company vehicle, the Company will cause the matter to be transferred to the Employee who had responsibility for the company vehicle at the relevant time.

### **Security**

- 20. Employees are responsible for maintaining the cleanliness of any company vehicle used by the Employee and for ensuring that all contents of the vehicle are secured in an appropriately safe manner (including by ensuring the company vehicle is locked at all times whilst unattended).

### **Permitted drivers**

- 21. A company vehicle provided to an Employee by the Company may be driven by the Employee, or by a member of the Employee's immediate family who holds a valid full Australian driver's licence (not a probationary licence or learner's permit), provided that the family member is accompanied by the Employee while driving the vehicle. Other individuals are *not* permitted to use or drive the company vehicle at any time.

### **Reasonable Private Use**

- 22. An Employee provide with a company vehicle is permitted to use the company vehicle outside of work hours for reasonable private use only. Reasonable private use means ordinary and incidental travel by the Employee outside of work hours during weekdays and on weekends. It does not typically include travelling distances in excess of 100km in a single journey or travelling interstate in a company vehicle. The Employee is required to first discuss and obtain consent from the management before embarking on travel that would exceed reasonable private use of a company vehicle.

### **Log book**

- 23. An Employee who uses a company vehicle must maintain an up to date log book for the vehicle for a period of at least 12 continuous weeks in each five year period (and otherwise during any period requested by the Company), and during that period make entries in the log book for each occasion of travel including the origin and destination of travel; odometer readings; and whether the travel is business or private travel. The logbook must be made available for inspection by the Company on request.

### **Company vehicle expenses**

- 24. By arrangement with individual Employees, the Company may provide, pay for, or reimburse the Employee for expenses such as registration, insurance and scheduled maintenance of company vehicles. Employees may be supplied with a fuel card, which is to be used for re-fuelling company vehicles only.

### **GPS tracking**

- 25. A company vehicle may be fitted with a GPS tracking device which records details of the company vehicle's whereabouts and speed at particular times. By using a company vehicle, the employee gives his or her consent to the Company installing the device and collecting, using and disclosing any information obtained from the device for its own business purposes.

## **Revocation**

26. Authority to use a company vehicle (whether for work use, private use or both) can be withdrawn at any time at the discretion of the Company for reasons including (but not limited to) the following:
- 26.1. the Employee no longer holds a current licence or licence of an appropriate class needed to drive a company vehicle;
  - 26.2. unsatisfactory driving or non-observance of this policy or applicable road rules or laws by the Employee; or
  - 26.3. changes in the Company's insurance policies or premiums or costs associated with the provision or use of the company vehicle (including for example, changes to laws relating to fringe benefits tax);
  - 26.4. a change in the Employee's employment duties or responsibilities which alters the Employee's work travel requirements;
  - 26.5. the Employee ceases to be employed by the Company, or is or will be absent from work for an extended period of time.

## **Breach of policy**

27. A breach or failure to comply with this policy may result in disciplinary action, which may include termination of employment.

The Company reserve the right to amend this policy at their discretion. In case of amendments, Employees will be informed as soon as possible.



## **POLICY AND PROCEDURE DECLARATION**

**Indepet Limited**

**(Company)**

I have read and understood each of the policies and procedures contained in the Company's Policy and Procedure Manual, including the Company's:

1. Bullying, Harassment and Equal Opportunity Policy;
2. Grievance Handling Policy;
3. Occupational Health and Safety Policy;
4. Electronic Use and Communication Policy;
5. Vehicle Policy;
6. Personal Presentation and Dress Policy; and
7. Mobile Phone Policy.

I will comply with the requirements set out in the Company's policies and procedures and any future amendments that are brought to my attention and understand that failure to do so might result in legal and/or disciplinary action, including dismissal.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_