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## ARI GRIEVANCE POLICY AND PROCEDURE [Interim]

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### Statement of Commitment

*Open communication and feedback are regarded as essential elements of a satisfying and productive work environment. Australian Registry Investments (ARI) encourages its employees and contractors to resolve any issues or concerns that they may have at the earliest opportunity with each other or, failing that, their immediate manager.*

*ARI values its people and acknowledges that an effective, prompt, fair, consistent and supportive procedure for handling grievances will contribute towards the maintenance of a harmonious and effective workplace.*

*The purpose of this document is to provide an avenue through which employees and contractors, and their managers, can resolve work-related grievances and complaints as they arise.*

*All grievances shall be dealt with seriously and sensitively, having due regard to procedural fairness and confidentiality.*

### Scope

This Policy applies to all ARI employees and contractors.

#### Related Documents

- [Interim] Behavioural Code
- [Interim] Disciplinary policy

### General Principles

The raising of a grievance does not imply any fault on any individual/s, and conversely it does not necessarily imply that the complaint will be found to be justified.

Employees and contractors should feel comfortable discussing issues with their manager in accordance with the procedures outlined below.

All formal avenues for handling of grievances must be fully documented.

No employee or contractor will be intimidated or unfairly treated in any respect if they utilise this policy to resolve an issue.

Discussions relating to the grievance should be between those directly involved. Where other parties become involved, they have a clear obligation to maintain confidentiality and respect the privacy of the parties and others involved in the process.

Any investigation of the grievance will be in accordance with the principles of natural justice, that is:

- Decision-makers will act fairly and without bias

- The person about whom a grievance is lodged shall have the opportunity to respond to any allegations

### **Responsibilities**

It is the responsibility of **Managers** to ensure that:

- They identify, prevent and address potential problems before they become formal grievances;
- They are aware of and committed to the principles of communicating and information sharing with their employees and contractors;
- All decisions relating to employment practices are made with consideration given to the ramifications for the individual, as well as the organisation in general;
- Any grievance is handled in the most appropriate manner at the earliest opportunity;
- Where a grievance or dispute requires it, an investigator is nominated in consultation with Human Resources
- All employees and contractors are treated fairly and without fear of intimidation.

It is the responsibility of **Employees and Contractors** to ensure that:

- They attempt to resolve any issues through their immediate supervisor and through internal processes at the earliest opportunity.

It is the responsibility of Human **Resources** to ensure that:

- All managers, employees and contractors are aware of their obligations and responsibilities in relation to communication and information sharing with their employees;
- Ongoing support and guidance is provided to all employees in relation to employment and communication issues;
- Assist in the nomination of an investigator where the grievance or dispute requires an investigation
- All managers, employees and contractors are aware of their obligations and responsibilities in relation to handling grievances;
- Any grievance that comes to the attention of managers is handled in the most appropriate manner at the earliest opportunity.

### **Preliminary Action**

Before initiating the grievance procedure, employees or contractors are encouraged to try to resolve any grievance directly with the person/s concerned. If this is not possible or appropriate, they should proceed to step 1 of the grievance procedure.

Although this document describes a three-step process in certain circumstances it may be appropriate for a step or steps to be missed or for an alternative procedure to be followed, without prejudicing the outcome.

### **Investigating a Grievance or Dispute**

An investigation may be required to resolve the grievance or dispute. The manager and Human Resources will decide who will take the role of the investigator for the purposes of the investigation.

The investigator will be responsible for ensuring procedural fairness and transparency are adhered to throughout the investigation.

The investigator should ensure that:

- the respondent is aware of all the allegations made against them in sufficient detail;
- the respondent is allowed a reasonable opportunity, including adequate time, to respond to each of the allegations;
- the investigation is carried out in a reasonable timeframe;
- all participants are given the opportunity to have a support person in the interviews pertaining to the investigation;
- all participants are required to maintain confidentiality

- the investigator has no personal interest or bias in the matter being investigated;
- all participants are given the opportunity to respond to any contradictory evidence;
- the investigator makes reasonable and diligent enquiries to ensure that there is sufficient evidence before making findings on the balance of probabilities.

### **Step 1: Talk to Immediate Manager/Supervisor**

Where the employee or contractor has been unable to resolve the grievance themselves, they should raise the matter with their immediate manager.

Where the grievance involves the supervisor, the employee or contractor should refer the matter to their supervisor's manager.

The manager should inform any respondents of the allegations made against them and provide them with an opportunity to respond.

### **Step 2: Referral to a Director or Manager**

If the grievance remains unresolved, then the matter is to be referred to the business unit Director or Manager by the employee or contractor's supervisor and/or the employee or contractor.

### **Step 3: Referral to the Chief Executive Officer**

If the grievance remains unresolved, then the matter is to be referred to the Chief Executive Officer by the employee or contractor's Director or Manager and/or the employee or contractor. Any decision made by the Chief Executive Officer in accordance with this policy is final.

### **Alternative procedures**

Complainants, respondents, and/or managers may seek advice or refer the matter to Human Resources at any time during the above-mentioned procedure.

### **Enquiries**

Advice in relation to this Policy and Procedure can be obtained from Human Resources.