



# CEO POLICY 510

# COMPLAINTS & GRIEVANCES

VERSION	REVIEW COMPLETED	CEO APPROVAL	NOTES/ COMMENTS
1	May 2020	May 2020	Initial document
2	Jun 2021	Jul 2021	Review
3	Aug 2023	Aug 2023	Review
4	Nov 2023	Nov 2023	<ul style="list-style-type: none"><li>• Branding update</li><li>• Policy update to capture Anti-discrimination, Bullying and Harassment</li><li>• Updated and in depth definition table</li><li>• Added additional Federal and State References</li></ul>
5	Nov 2025	Nov 2025	Review

<b>APPLIES TO</b>	All CEnet Employees, Contractors and Directors	
<b>OWNER</b>	Manager People & Culture	
<b>ENDORSED BY</b>	Chief Financial Officer	November 2025
<b>APPROVED BY</b>	Chief Executive Officer	November 2025
<b>REVIEW CYCLE</b>	Biennial	
<b>NEXT REVIEW</b>	November 2027	
<b>RELATED POLICY DOCUMENTS</b>	Board Policy 103: Privacy Board Policy 500: People & Culture Board Policy 501: Safety & Wellbeing at Work Board Policy 502: Code of Conduct CEO Policy 512: Recruitment and Induction CEO Policy 514: Performance Management	

## 1. Purpose

The purpose of this policy is to outline CEnet’s resolution pathways available should Employees experience or witness unacceptable or unlawful behavior in the workplace or raise a workplace complaint.

This includes acts of discrimination, harassment or bullying and a breach of policy or legal obligation that applies to CEnet.

## 2. Guiding Principles

The management of complaints and grievances at CEnet is based on the following guiding principles:

- 2.1 To support the rights of Employees, Contractors and Directors to achieve their full potential free from discrimination, bullying, harassment, sexual harassment, sex-based harassment, victimisation and vilification.
- 2.2 To provide a robust set of principles, responsibilities and procedures associated with preventing and resolving complaints.
- 2.3 To ensure prompt resolution of grievances in a confidential manner, with access to informal and formal mechanisms for resolving complaints and grievances as required.

## 3. Policy Statements

- 3.1. CEnet is committed to maintaining a workplace that encourages, cooperates, collaborates and trust among all employees.
- 3.2. CEnet will promote and maintain positive working relationships and harmonious working environments to prevent, where possible, minor workplace complaints escalating to become a more serious matter.

- 3.3. On occasions, inappropriate behaviours may occur and a grievance process is required to resolve complaints or concerns.
- 3.4. Employees can report grievances when:
  - 3.4.1. They have been victims of workplace harassment;
  - 3.4.2. Their health and safety has been compromised;
  - 3.4.3. They have witnessed poor supervision and/or management behaviour;
  - 3.4.4. There are unjust changes made to the employment agreement;
  - 3.4.5. Policy guidelines are violated; and
  - 3.4.6. There is a dispute between co-workers, suppliers and/or management.
- 3.5. This policy applies whenever and wherever employees are at work, even if this work is undertaken outside ordinary business hours or away from the office. This includes:
  - 3.5.1. Off-site training days;
  - 3.5.2. Company social and sporting events;
  - 3.5.3. Team celebrations;
  - 3.5.4. Stakeholder engagement, events and conferences.
- 3.6. CENet will respond promptly and effectively to complaints which will be handled objectively and fairly with appropriate confidentiality.

## 4. Responsibilities

- 4.1. The CEO adopts the following general principles in assigning accountabilities and responsibilities relating to CEO Policies:

### **Chief Executive Officer:**

- a. Approves CEO Policies and reviews them on a scheduled and cyclical basis to ensure they are current and fit-for-purpose.
- b. Sets the direction, establishes the framework and highlights the guiding principles upon which the CEO Policies are based.
- c. Ensures resources are available to allow for proper and effective implementation of the CEO Policy.
- d. Promotes a culture that supports compliance with the CEO Policy.
- e. Delegates the responsibility of monitoring CEO Policy compliance and effectiveness to the Leadership Team, a designated Operational Committee or Designated Officer of the Leadership Team if considered appropriate to do so.

### **The Policy Owner and Executive Leadership Team:**

- a. Reviews and makes recommendations to the CEO on the adequacy of the CEO Policy.
- b. Reviews and makes recommendations to the CEO on any incident arising from non-compliance with the CEO Policy.

### **The Policy Owner and Executive Leadership Team:**

- a. Establishes and implements appropriate systems to support compliance with the CEO Policy.
- b. Facilitates training and education of those required to comply with the CEO Policy.

- c. Maintains appropriate registers and records as required under the CEO Policy.
- d. Monitors compliance with the CEO Policy and reports to the CEO any identified instances of non-compliance.

**Employee:**

- a. Complies with and adheres to the CEO Policy and any associated procedures and guidelines established to support compliance with the CEO Policy.
  - b. Reports any identified instance of non-compliance with the CEO Policy to an identified authority.
- 4.2. CEO Policies may have specific accountabilities and responsibilities. These are outlined in the CEO Policy Responsibility Assignment Matrix (RACI) which is maintained by the Executive Leadership Team upon delegation by the CEO. The RACI is reviewed and updated at least annually.

## 5. Definitions

<i>Bullying</i>	When an individual or group of individuals repeatedly behave unreasonably towards a worker and that behaviour creates a risk to health and safety.
<i>Complaint</i>	An expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
<i>Contractor</i>	An external contractor or agency staff member engaged with CEnet to provide a service.
<i>Discrimination</i>	Occurs when an individual or a group is treated unfavourably because of a personal attribute protected by law.
<i>Employee</i>	A person directly employed by CEnet (either on a full-time, part-time, fixed-term or casual basis).
<i>Grievance</i>	A concern, problem, or complaint that an employee has about their work, the workplace, or someone they work with.
<i>Harassment</i>	A type of discrimination involving unwelcome language or behaviour that, regardless of the intention, could be reasonably anticipated to offend, embarrass, intimidate or threaten another person.
<i>Reasonable Management</i>	Reasonable Management includes actions, such as general performance monitoring, reasonable constructive criticism, check-ins, setting

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	reasonable goals and KPIs, putting in place performance improvement plans, completing investigations, and justified disciplinary action up to and including termination of employment.
<i>Sexual harassment</i>	Sexual harassment in the workplace generally includes any unsolicited or unwelcome conduct of a sexual nature which a reasonable person would find intimidating, humiliating or offensive, where a reasonable person would anticipate the possibility of that reaction in the circumstances, regardless of the intention of the offender. Sexual harassment can be driven by gender inequality.
<i>Sex-based harassment</i>	Is conduct that is seriously demeaning but is not necessarily sexual. This could include making sexist remarks or harassing on the grounds of gender stereotypes.
<i>Vexatious claim /complaint</i>	A vexatious claim/complaint can be, but is not limited to, a groundless complaint that causes distress, detriment or harassment to the subject of the complaint; or a complaint that is unduly repetitive, burdensome, or unwarranted when compared to its merits.
<i>Victimisation</i>	Occurs when a person subjects another person to detriment because they have lodged, or may lodge, a discrimination, bullying or harassment complaint.
<i>Vilification</i>	Is behaviour that incites hatred, serious contempt for, or revulsion or severe ridicule of a person or group of people because of their race or religion.
<i>Workplace / work environment</i>	A location where someone works for his or her employer, a place of employment. Such a place can range from a home office to a large office building or factory.

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## 6. Guidance

The following federal, state and territory legislations are applicable to this policy:

### 6.1. Federal

- 6.1.1. Australian Human Rights Commission Act 1986 (Cth)
- 6.1.2. Age Discrimination Act 2004 (Cth)
- 6.1.3. Disability Discrimination Act 1992 (Cth)
- 6.1.4. Fair Work Act 2009 (Cth)
- 6.1.5. Racial Discrimination Act 1975 (Cth)
- 6.1.6. Sex Discrimination Act 1984 (Cth)
- 6.1.7. Work Health and Safety Act 2011 (Cth)

### 6.2. New South Wales

- 6.2.1. Anti-Discrimination Act 1977 (NSW)
- 6.2.2. Work Health and Safety Act 2011 (NSW)
- 6.2.3. Work Health and Safety Regulation 2011 (NSW)

- 6.3. Queensland
  - 6.3.1. Anti-Discrimination Act 1991 (QLD)
  - 6.3.2. Work Health and Safety Act 2011 (QLD)
  
- 6.4. Tasmania
  - 6.4.1. Anti-Discrimination Act 1998 (TAS)
  - 6.4.2. Work Health and Safety Act 2012 (TAS)
  
- 6.5. Northern Territory
  - 6.5.1. Anti-Discrimination Act 1992 (NT)
  - 6.5.2. Work Health and Safety (National Uniform Legislation) Act 2011 (NT)
  
- 6.6. ACT
  - 6.6.1. Discrimination Act 1991 (ACT)
  - 6.6.2. Work Health and Safety Act 2011 (ACT)

## **7. Breaches of this Policy**

- 7.1. Where an Employee, Contractor or Director is found to have breached any of their obligations under this Policy and/or applicable Federal, or State or Territory legislation, disciplinary action may be taken. In the case of Employees, this may include a formal written warning or the termination of the Employees employment (with or without notice). In the case of a Contractor or Director, this may include the termination of their engagement. The breach may also result in prosecution of either CEnet and/or the Employee or Contractor/Director. Prosecution may result in a criminal conviction with the imposition of a penalty against the prosecuted party or parties.

## **8. Monitoring Arrangements**

Compliance with this Policy is subject to CEnet's monitoring and review procedures including the annual compliance review program as overseen by the Executive Leadership team.

**END OF POLICY**