

A3D-OPR-POL-0075

## EEO and Anti-Discrimination Policy

### Document Control – Version History

Version	Approved By	Date	Summary of Changes
1	Rebekah Letheby	(Original)	Initial release of the Anti-Bribery and Anti-Corruption Policy.
2	Rebekah Letheby	25 July 2025	Periodic review and minor revisions to the Policy.
3	Rebekah Letheby	28 May 2026	Added table of contents, updated formatting

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## 1. Purpose

Aurora Labs is committed to providing a safe, respectful, and inclusive workplace free from discrimination, harassment, bullying, and victimisation.

This policy reflects Aurora Labs' obligations under current Western Australian and Federal legislation, including:

- *Equal Opportunity Act 1984 (WA)* (as amended in 2024 regarding gender reassignment).
- *Work Health and Safety Act 2020 (WA)* and supporting regulations.
- *Fair Work Act 2009 (Cth)*.
- *Sex Discrimination Act 1984 (Cth)*.
- *Racial Discrimination Act 1975 (Cth)*.
- *Disability Discrimination Act 1992 (Cth)*.
- *Age Discrimination Act 2004 (Cth)*.

Aurora Labs will take all reasonable and practicable steps to eliminate unlawful discrimination and to promote equality of opportunity in all aspects of employment.

## 2. Applicability

This policy applies to all:

- Employees, contractors, directors, consultants, contractors, interns, labour hire staff, volunteers, and job applicants.
- Activities and locations related to Aurora Labs' business, including offices, client sites, remote work, digital environments, work travel, training, conferences, and social functions.

## 3. Policy Statement

Aurora Labs will:

- Ensure that employment decisions (hiring, promotion, training, conditions) are based on merit and the inherent requirements of the role.
- Take proactive steps to maintain a workplace free from discrimination, harassment, bullying, and victimisation.
- Meet its obligations under the Work Health and Safety Act 2020 (WA) by protecting employees from psychosocial hazards, including harassment and bullying.
- Provide a confidential and fair grievance resolution process.
- Take disciplinary action against anyone found in breach of this policy, up to and including termination.

## 4. Definitions

### **Discrimination**

Discrimination occurs when a person is treated less favourably because of a personal characteristic or protected attribute. It may be:

- Direct discrimination – overt unfair treatment.
- Indirect discrimination – a policy or requirement that disproportionately disadvantages a protected group without justification.

Protected attributes under WA and Federal law include:

- Race, colour, national or ethnic origin, or immigrant status.
- Sex, gender identity, intersex status, marital or relationship status, pregnancy, potential pregnancy, breastfeeding, or family responsibilities.
- Sexual orientation.
- Disability (physical, intellectual, psychiatric, sensory, neurological, learning, illness, or medical condition).
- Age.
- Religious or political belief or activity.
- Parental or carer responsibilities.
- Union membership or non-membership.
- Physical features.
- Association with someone who has, or is assumed to have, one of these attributes.

### Exemptions

It is not discrimination if a decision is:

- Based on an inherent requirement of the role.
- Part of a lawful and reasonable performance management process.

## 5. Responsibilities

- **Management:** Implement policies, training, and monitoring to ensure compliance.
- **Supervisors & Team Leaders:** Promote inclusion and act promptly on complaints.
- **Employees & Contractors:** Treat others with dignity and respect, report breaches, and uphold Aurora Labs' values.

## 6. Grievance and Complaints

Aurora Labs provides an internal grievance process to resolve issues quickly and fairly.

- Complaints will be treated confidentially, promptly, and impartially.
- Employees will not be victimised or disadvantaged for lodging genuine complaints.
- Where internal resolution is not possible, matters may be referred to external bodies, including the:
  - Equal Opportunity Commission of WA.
  - Fair Work Commission.
  - Australian Human Rights Commission.
  - WorkSafe WA (for WHS-related concerns).

## 7. Review and Compliance

- This policy will be effective from issue date and be reviewed if laws change.

- The review will consider legislative updates, including reforms to the *Equal Opportunity Act 1984 (WA)* currently under government consideration.
- Aurora Labs is committed to continuous improvement in promoting diversity, equity, and inclusion.