Cylinder Works Limited is committed to providing equal employment opportunity and a workplace free from discrimination, sexual harassment and bullying. This policy applies to all employees and contractors, all work-related functions and activities (including Company-sponsored external training), and recruitment, selection and promotion decisions.
The Company aims to attract and retain capable employees, provide a safe, respectful and reasonably flexible work environment, and deliver its services in a safe and respectful manner.

Equal Opportunity and Unacceptable Conduct

- Direct discrimination occurs when a person is treated unfavourably because of a personal characteristic protected under the Constitution or applicable equal opportunity requirements.
- Indirect discrimination occurs where an apparently neutral rule or requirement has a discriminatory effect on people with a protected characteristic.
- Sexual harassment includes unwelcome conduct of a sexual nature that a reasonable person would anticipate may offend, humiliate or intimidate the person concerned.
- Workplace bullying includes behaviour directed at an employee or group of employees that creates a risk to health and safety, such as physical or verbal abuse, excluding or isolating individuals, or assigning impossible tasks.
- CWL shall provide equal opportunity without discrimination on protected grounds identified in the Company's source policy, including age, breastfeeding, carer status, disability, employment activity, gender identity, marital status, parental status, personal association with a person having a listed characteristic, physical features, political activity or belief, pregnancy, race, religious activity or belief, sex and sexual orientation.
- Employees shall report discrimination, sexual harassment or bullying to their manager. Employees shall not be victimised or treated unfairly for raising a concern or making a complaint.

Reasonable Adjustments

CWL shall consider reasonable adjustments for a person with a disability who applies for a job, is offered employment or is an employee and requires an adjustment to participate in recruitment or perform the genuine and reasonable requirements of the job. Examples may include adjusting performance requirements, flexible working hours, telephone typewriter access for employees with hearing or speech impairments, screen-reading software, additional breaks for chronic pain or fatigue, or adjustable-height desks. The Company shall weigh the need for an adjustment against the expense or effort involved. An adjustment may not be reasonable where it would involve very high cost or significant workplace disruption, or where the person cannot perform the genuine and reasonable requirements of the job even with adjustments.

Procedure for Making a Complaint

- Where comfortable and safe to do so, the employee may tell the person responsible that the behaviour is unwelcome, offensive and must stop. The employee should keep a written record of the incident. If direct discussion is not comfortable, the employee should speak to a manager.

- If the behaviour continues, the employee should contact their supervisor or manager for support.
- If approaching the immediate supervisor is inappropriate, the employee feels uncomfortable, or the behaviour persists, the employee may contact another relevant senior manager or lodge a complaint with the Director.
- Complaints shall be treated confidentially as far as possible.

Receiving and Investigating Complaints

- The manager shall listen seriously, maintain confidentiality as far as possible and allow the complainant to have another person present during the interview if requested.
- The manager shall obtain the complainant's account step by step, record the details in the complainant's own words and ask the complainant to check the notes for accuracy.
- The manager shall explain and agree the next steps with the complainant. Where an investigation is not requested and the manager is satisfied that the conduct does not breach Company policy, the manager shall act promptly, maintain confidentiality and forward relevant notes to their manager.
- Where an investigation is appropriate, the manager shall not assume guilt; shall explain possible outcomes if allegations are substantiated; and shall interview the persons directly concerned and witnesses separately.
- The alleged harasser shall be informed clearly of the allegations and given an opportunity to respond. Interviews and investigation steps shall be documented, and disclosure shall be limited as far as possible.
- The manager shall decide appropriate action based on the evidence, check that the proposed action addresses the needs of the complainant and CWL, and refer the matter to more senior management where necessary.
- Relevant outcomes shall be discussed with the complainant where appropriate.

Possible Outcomes

Where a complaint is substantiated, outcomes may include counselling, a warning or dismissal of the person responsible; staff training or additional training for the person responsible or all staff; counselling for the complainant; or an apology on terms agreed by those involved.

Any employee found to have breached this policy may be subject to disciplinary action, up to and including dismissal, in accordance with Company procedures.

This policy shall be reviewed on an annual basis.

Approved By:

Michael Njoroge,
MD, Cylinder Works Limited.

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