



SHIP MANAGEMENT GROUP

WE MANAGE SHIPS SAFELY



Harassment and Anti-Discrimination Policy

ASP Ship Management Group (ASP) is committed to taking all reasonable steps to prevent Harassment and Discrimination so as to provide a safe, comfortable and productive work environment.

This Policy sets out what constitutes harassment and discrimination and ASP's complaint procedure which has been implemented to ensure that conduct of that nature is dealt with promptly, confidentially and impartially.

Harassment and Discrimination impinges on a person's rights and is prohibited by law. It can result in low staff morale, poor work performance, absenteeism, increased sick leave, risks to health & safety, accidents, resignations and an intimidating unproductive work environment. It can also result in legal action against the harasser, the discriminator, their immediate supervisor and manager and the organisation.

ASP will not tolerate Harassment and Discrimination. Any issues or complaints of Harassment and Discrimination will be treated in a timely, serious and confidential manner (where appropriate). In circumstances where allegations of Harassment and Discrimination have been substantiated, disciplinary action may be taken, including termination of employment or non-renewal of contracts.

When an alleged or proven incident of Harassment and Discrimination also equates to a criminal offence, it is generally the choice of the individual as to whether or not to report the incident to the police. Irrespective of whether a matter is reported to the police or not, ASP will ensure that where appropriate allegations of Harassment and Discrimination are fully and impartially investigated.

Defamation and other laws act as a deterrent to the making of false or vexatious Harassment and Discrimination complaints. If a complaint is found to have been made with deliberate malice, inappropriate intent or falsely and not in good faith, disciplinary action will be taken.

This Harassment and Anti-Discrimination Policy extends to all employees, supervisors, managers, contractors, consultants and board members; acknowledging the right of all to a professional and supportive working environment. Employees and workplace participants must also be aware of the contents of this Policy and their rights and obligations in respect of it.

In addition, this Policy requires all employees, supervisors, managers, contractors, consultants and board members to adhere to federal, state and territory laws prohibiting workplace and work related Harassment and Discrimination. Every individual is legally responsible and will be held accountable for their behaviour at work or outside of work, when representing the organisation.

Authorised by:

David Borcoski

Group Managing Director

1st April 2011

Authorised by:

Robert Bird

Group Chief Operating Officer

1st April 2011