



Ethical Employment & Workforce Diversity Policy

Purpose

In recent years there has been growing scrutiny of working conditions in the cleaning industry, with the Fair Work Ombudsman reporting and prosecuting numerous cases of workers not receiving their lawful wages and entitlements. The Bendigo Cleaning Company, a trading name of OFG Bendigo Pty Ltd (ACN 682 049 921) ("TBCC", "we", "us", "our") is committed, through all of its actions and employment practices, to being an ethical employer and a diverse, inclusive workplace.

This policy also sets out how TBCC builds a workplace that includes people of every background, age, gender, culture, faith and ability — with specific commitments for Aboriginal and Torres Strait Islander people, women, young and mature-age workers, people from culturally and linguistically diverse backgrounds, LGBTQIA+ people and carers — and how we include people with disability at every stage of employment, from recruitment through to development, adjustments, and return to work after injury or illness.

Scope

This policy applies to all TBCC employees, contractors and suppliers, and to all recruitment, employment, return to work and procurement activity across the business. It applies at TBCC's own premises and at every client site where TBCC staff work.

Definitions

Ethical Employment: employment that meets or exceeds an employee's lawful entitlements, and that is free from exploitation, discrimination and unsafe conditions.

Modern Award: the industrial instrument setting minimum pay and conditions for a sector — for TBCC's cleaning workforce, the Cleaning Services Award 2020 (MA000022).

National Employment Standards (NES): the minimum employment entitlements set out in the Fair Work Act 2009 (Cth), which apply in addition to the relevant modern award.

Equal Opportunity: the right of every person to be considered for work, training and advancement on merit, free from discrimination.

Culturally and Linguistically Diverse (CALD): describes people from a range of cultural and language backgrounds, including recently arrived migrants and refugees.

Diversity: the differences between people, including in culture, ethnicity, language, faith, age, gender, sexual orientation, gender identity, disability, family and caring responsibilities, and life experience.

Inclusion: an environment where every person is respected, can take part fully and has a fair chance to progress, so that diversity is genuinely valued rather than only counted.

Discrimination: treating a person less favourably, or applying a rule that unfairly disadvantages them, because of a personal characteristic that is protected by law, such as race, sex, age, disability, sexual orientation, gender identity, religion, or family or carer status.

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Sexual Harassment: unwelcome sexual conduct that a reasonable person would expect to offend, humiliate or intimidate, including comments, messages, images, touching and requests for sexual favours.

Cultural Safety: an environment that is spiritually, socially and emotionally safe for Aboriginal and Torres Strait Islander people, where their identity, culture and obligations are understood and respected.

LGBTQIA+: lesbian, gay, bisexual, transgender, queer or questioning, intersex, asexual, and other people of diverse sexual orientation, gender identity or sex characteristics.

Disability: has the broad meaning given in the Disability Discrimination Act 1992 (Cth). It includes physical, intellectual, psychiatric, sensory, neurological and learning disability, and covers disability a person has now, has had in the past, may have in the future, or is believed to have.

Reasonable Adjustment: a change to a process, practice, task, tool, roster or work environment that allows a person with disability to apply for, perform and progress in a role safely and effectively, without imposing unjustifiable hardship on TBCC.

Inherent Requirements: the essential tasks of a role that must be performed for the job to be done, as distinct from the particular way those tasks are usually carried out.

Unjustifiable Hardship: an adjustment that would impose major difficulty or unreasonable cost on TBCC after all relevant circumstances, including available funding support, have been considered.

Disability Employment Services (DES) and Inclusive Employment Australia (IEA): Australian Government-funded employment services that help people with disability find and keep work. IEA replaced DES from 1 November 2025.

Employment Assistance Fund (EAF): an Australian Government fund, accessed through JobAccess, that can contribute to workplace modifications, equipment and services for eligible employees with disability.

Return to Work Coordinator: the TBCC position responsible for coordinating an injured or ill worker's return to work, with the seniority and competence to help TBCC meet its return to work obligations.

Suitable Employment: employment that an injured worker has the capacity to perform safely, consistent with their treating health practitioner's advice.

Pre-injury Employment: the role the worker held before the injury or illness, or an equivalent role.

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Policy Statement

TBCC is committed to:

- Upholding human rights and fair working conditions in line with the expectations of our customers, our community and the law.
- Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with employees and clients, consistent with our values of integrity, trust and acting responsibly.
- Welcoming and engaging people from diverse backgrounds and ages, and building genuine pathways into secure, ongoing employment.
- Building a workforce that reflects the communities we serve, including Aboriginal and Torres Strait Islander people, women, young and mature-age workers, people from culturally and linguistically diverse backgrounds, LGBTQIA+ people, carers, and people who face barriers to work.
- Providing a respectful workplace that is free from discrimination, sexual harassment, racism, bullying and victimisation.
- Recruiting, developing and retaining people with disability on merit, and making reasonable adjustments so they can work safely and effectively.
- Supporting every injured or ill worker to return to safe and durable work as soon as it is appropriate.

Our Legal and Regulatory Context

TBCC's approach is informed by the following laws, which are summarised here and should be read in their current form:

- **Disability Discrimination Act 1992 (Cth)** — makes it unlawful to discriminate against, harass or victimise a person because of disability in employment, and requires reasonable adjustments unless they would cause unjustifiable hardship.
- **Equal Opportunity Act 2010 (Vic)** — prohibits discrimination on the basis of disability and other attributes, and places a positive duty on employers to take reasonable and proportionate measures to eliminate discrimination, sexual harassment and victimisation as far as possible.
- **Fair Work Act 2009 (Cth)** — sets the NES, gives eligible employees, including employees with disability, a right to request flexible working arrangements, and protects employees from adverse action because of disability or injury.
- **Workplace Injury Rehabilitation and Compensation Act 2013 (Vic)** — requires employers to provide suitable or pre-injury employment to workers with a work-related injury or illness, and to appoint a return to work coordinator.

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- **Occupational Health and Safety Act 2004 (Vic)** — requires TBCC to provide and maintain a safe workplace, which includes assessing the safety of any adjustment.
- **Sex Discrimination Act 1984 (Cth)** — prohibits sex discrimination, sexual harassment and discrimination because of sexual orientation, gender identity, intersex status, marital or relationship status, pregnancy or family responsibilities, and places a positive duty on employers to take reasonable and proportionate steps to eliminate workplace sexual harassment, sex discrimination and related victimisation as far as possible.
- **Racial Discrimination Act 1975 (Cth)** and **Age Discrimination Act 2004 (Cth)** — prohibit discrimination in employment on the basis of race, colour, descent, national or ethnic origin, and age.
- **Workplace Gender Equality Act 2012 (Cth)** — requires relevant employers (generally those with 100 or more employees, including as part of a corporate group) to report annually on gender equality indicators. TBCC will meet any reporting obligation that applies to it.

Working Conditions

- All TBCC cleaning staff are employed under the Cleaning Services Award 2020 (or any successor award) and the NES, with all lawful entitlements — including superannuation, leave and part-time or shift allowances — factored into TBCC's pricing and quoting.
- A safe working environment is provided, having regard to prevailing industry knowledge and any site-specific hazards, consistent with TBCC's Occupational Health & Safety Policy.
- Working hours comply with the law and relevant industry standards, whichever affords greater protection.
- TBCC does not discriminate in hiring, pay, access to training, promotion, termination or retirement on the basis of race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- TBCC does not use labour-only contracting or sub-contracting to avoid its obligations to employees under workplace or social security law.

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Building Success Through Diversity & Inclusion

TBCC recruits and retains great people, and achieves better outcomes for clients, by welcoming and engaging people from diverse backgrounds and ages.

Diverse Recruitment Partnerships

- TBCC maintains relationships with recruitment agencies and community organisations supporting diverse jobseekers, including employment service providers such as WDEA, AXIS, Headspace, APM and CVGT, CALD-specialist agencies such as Matchworks, and community programs.
- TBCC can provide external support and appropriate training to support a linguistically diverse workforce.

Inclusive Recruitment & Selection

- Job advertisements use plain, inclusive language and are shared through varied channels, including community and employment-service networks, alongside TBCC's standard channels.
- Selection is based on skills, experience and potential, assessed against consistent criteria, with more than one person involved in selection decisions wherever practicable.
- Recruitment steps, such as interviews, work trials and screening checks, are explained clearly and supported throughout, and are not used as unnecessary barriers to employment.

Internal Pathways & Leadership

- Leadership vacancies are advertised internally to all employees, and supervisors and administrators are recruited from within TBCC's diverse cleaning workforce wherever possible.
- TBCC's leadership team is trained in supportive leadership and maintains an open-door policy, and continuous improvement suggestions from any employee are welcomed.

Flexible & Secure Employment

- TBCC is committed to providing permanent and secure jobs, and to offering opportunities for promotion close to home.
- Flexible work arrangements are covered under Disability Inclusion and Carers & Family Responsibilities below.

Equal Opportunity

- TBCC is an equal opportunity employer and does not tolerate discrimination in any form.
- TBCC complies with all applicable industrial relations laws and provides a safe, fair and welcoming workplace to everyone.

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Respect, Safety & Zero Tolerance

- TBCC does not tolerate discrimination, sexual harassment, racism, bullying or victimisation, whether it occurs at TBCC premises, on a client site, or online or on social media, and whether it involves colleagues, clients or members of the public.
- In line with its positive duties under the Sex Discrimination Act 1984 (Cth) and the Equal Opportunity Act 2010 (Vic), TBCC takes reasonable and proportionate steps to prevent harm before it happens, not only to respond to complaints. This includes identifying risks such as lone, night and after-hours work, working at isolated sites and working alongside clients' staff, training supervisors and employees, and acting promptly on concerns.
- Anyone can raise a concern with a supervisor or with management. Concerns are handled fairly and confidentially, and no one is disadvantaged for raising a concern in good faith. A person can also contact the Australian Human Rights Commission, the Victorian Equal Opportunity and Human Rights Commission or the Fair Work Ombudsman.

Inclusive Culture & Learning

- All employees receive an employee handbook which outlines our policy on respect, inclusion and how to raise a concern.
- TBCC invites feedback from employees of all backgrounds about how inclusive the workplace feels through its open-door policy, team conversations and other channels, and acts on what it hears.
- TBCC recognises significant days that matter to its people and community, such as NAIDOC Week, National Reconciliation Week, Harmony Day, International Women's Day, International Day of People with Disability and IDAHOBIT.

Aboriginal & Torres Strait Islander Inclusion

- TBCC provides culturally safe recruitment, induction and workplaces, and supports Aboriginal and Torres Strait Islander employees to take part in cultural and community obligations.
- TBCC's commitments on Aboriginal and Torres Strait Islander employment, leadership pathways and procurement are set out in its Indigenous Procurement and Employment Policy, which should be read together with this policy.

Gender Equality

- TBCC applies classifications, pay, rostering and access to training consistently, regardless of gender, and is committed to equal pay for equal work under the Cleaning Services Award 2020.
- TBCC encourages women, and people of all genders, to apply for and progress into leading hand, supervisory and management roles, and reviews the gender balance of its workforce and leadership each year.

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- TBCC supports employees affected by family and domestic violence through family and domestic violence leave under the NES, flexible arrangements and confidential support.

Cultural, Linguistic & Faith Inclusion

- TBCC welcomes people from culturally and linguistically diverse backgrounds, including migrants and refugees, and works with community and settlement organisations to open pathways into secure work.
- Induction, safety and work instructions are provided in plain English and, where helpful, in pictorial form, with translated material or interpreters used for important matters such as employment terms, safety and how to raise a concern.
- TBCC makes reasonable efforts to accommodate religious and cultural observances, such as prayer times, festivals and cultural events, through rostering, leave and flexible arrangements.
- TBCC supports employees on employer-sponsored or other visas to understand their workplace rights, consistent with its Modern Slavery Policy.

Age Inclusion

- TBCC welcomes young workers, trainees, and mature-age and older workers, and does not make decisions about recruitment, rostering, training, promotion or retirement on the basis of age.
- Young and new workers are supported through induction, supervision and a buddy or mentor, and mature-age workers are supported through reasonable adjustments, such as task rotation or lighter equipment, where needed.
- TBCC encourages the sharing of skills and knowledge across generations, including through experienced employees mentoring newer team members.

LGBTQIA+ Inclusion

- TBCC provides a workplace where LGBTQIA+ employees can be themselves, and does not tolerate discrimination, vilification or harassment on the basis of sex, sexual orientation, gender identity, gender expression or sex characteristics.
- TBCC respects employees' names, pronouns and privacy, and does not disclose a person's sexual orientation, gender identity or sex characteristics without their consent.

Carers & Family Responsibilities

- TBCC supports employees who care for children, family members or others by considering flexible hours, rosters and leave in line with the NES, and does not discriminate on the basis of parental or carer status.

People Facing Barriers to Work

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- TBCC works with employment service and community organisations to offer opportunities to people who face barriers to work, such as young people, long-term unemployed people, refugees, veterans, and people returning to work after a break.

Disability Inclusion

Our Inclusion Statement

TBCC is committed to being a workplace where every person, including people with disability, is welcomed, respected and able to do their best work. We recruit, develop and retain people on merit, make reasonable adjustments so employees can perform their roles safely and effectively, and work with employment services and community organisations to open secure jobs and clear pathways into leadership.

This statement, and this policy, are published on TBCC's 'Compliance' page of the website so that candidates, employees, clients and partners can see our commitments.

Inclusive Recruitment & Retention

- Roles are advertised through TBCC's standard channels and through employment service providers, and are described by their inherent requirements rather than assumptions about who can do the work.
- Applicants can apply and be interviewed in the way that suits them best — in writing, by phone, in person or with a support person — and are asked, without pressure, whether they need an adjustment for the application, interview or a work trial.
- Selection is based on merit and ability to perform the inherent requirements of the role, with reasonable adjustments considered before any decision that a person cannot perform it.
- TBCC does not ask for medical or disability information that is not needed for the role or for an adjustment.
- Retention is supported through regular check-ins with new starters, early conversations about adjustments, and review of adjustments when duties, sites or circumstances change.

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Reasonable Adjustments

TBCC will consider a reasonable adjustment whenever an applicant or employee asks for one, or where TBCC becomes aware that one may be needed. Examples include adjusted duties or task rotation, changes to roster or start times, lighter or ergonomic equipment, instructions in pictorial or plain-language form, Auslan or other communication support, assistive technology, a support person, or a graduated start.

- **Requesting:** a person can ask in any way that suits them — verbally or in writing, to their supervisor, to the General Manager, or through a support person or employment service provider.
- **Assessing:** the General Manager, or their delegate, meets with the person to understand their needs, considers the options with the person, and carries out a risk assessment of any adjustment under TBCC's Occupational Health & Safety Policy.
- **Funding:** TBCC will check whether the Employment Assistance Fund, an employment service provider or another program can contribute to the cost before concluding that an adjustment is too costly.
- **Deciding:** the decision, and the reasons for it, are given to the person in writing, in an accessible form. An adjustment is refused on the basis of unjustifiable hardship only after alternatives have been explored with the person.
- **Reviewing:** an adjustment is put in place as agreed, and reviewed periodically during the first 6 months, and again whenever the person's duties, site or needs change.
- **Raising a concern:** if the person disagrees with a decision, they can request to have it escalated to the Directors and are entitled to involve a support person.

Flexible Work Arrangements

- TBCC considers flexible arrangements, including changes to hours, rosters, sites and equipment, for employees with disability and for employees who are carers.
- Employees can make a request in line with the right to request flexible working arrangements under the Fair Work Act 2009 (Cth) and the Cleaning Services Award 2020. TBCC responds to each request in writing and explains its reasons if a request cannot be accommodated.

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Accessible Facilities, Equipment & Technology

- Where a client site presents an access barrier, TBCC will work with the client to remove it or to adjust the tasks or work location so that the employee can perform the role safely.
- Cleaning equipment is selected with ergonomics, weight and ease of use in mind. Where a disability prevents a person from safely operating particular equipment, TBCC will endeavour to adjust the equipment or reallocate duties so the person can continue to work safely, and will not require anyone to operate equipment they cannot safely use.
- Induction, training and policy documents are available in plain language, and TBCC will adapt them to suit individual needs on request.

Targeted Employment Pathways

TBCC already offers employment opportunities for people with disability through its relationships with employment services. TBCC will formalise these pathways by:

- Documenting the steps from referral through work trial to employment, including the contacts at TBCC and at each employment service provider.
- Considering work trials, supported wage arrangements under the Cleaning Services Award 2020, traineeships and nationally recognised training.
- Offering a buddy or mentor to every new starter who asks for one, and a development plan for employees with disability who are interested in leading hand, supervisory or site management roles.
- Reviewing measurable annual employment metrics for the employment of people with disability.
- Maintaining at least 2 supported employment placements for people with disability each year through employment service partners, with progress reported to the Directors annually.

Staff Development & Support

- All employees complete induction that includes TBCC's inclusion commitments and how to request an adjustment.
- Employees with disability have equal access to training, qualifications and promotion, with training delivered in accessible formats.
- Employees can use TBCC's open-door policy, or raise a concern confidentially with the General Manager.

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Relationships with Employment Services

- TBCC maintains working relationships with employment service providers, including those delivering Inclusive Employment Australia, and uses JobAccess and the Employment Assistance Fund for advice and funding on workplace adjustments.

Confidentiality

- Disclosing a disability or health condition is the employee's choice. TBCC does not require it, except where the information is needed to implement an adjustment or to keep the person and others safe.
- Information about a disability or health condition is kept confidential and shared only with the people who need it to implement an adjustment or return to work arrangement, in line with applicable privacy law and with the employee's knowledge.

Harassment & Complaints

- TBCC does not tolerate discrimination, harassment or victimisation of any person because of disability, or because they are the associate or carer of a person with disability.
- Concerns can be raised to management directly or escalated to the Directors. A person can also contact the Victorian Equal Opportunity and Human Rights Commission, the Australian Human Rights Commission or the Fair Work Ombudsman.

Return to Work After Injury or Illness

TBCC supports every worker who has been injured or become ill to return to safe and durable work as soon as it is appropriate, whether or not the injury or illness is work-related.

Principles

- Early, respectful contact with the worker, and consultation with them about their return to work.
- Work is good for recovery when it is safe, so TBCC plans a return around what the worker can do, based on the advice of their treating health practitioner.
- Return to work arrangements are practical, written down and reviewed regularly.
- No worker is pressured to return before they are medically cleared, or to give up their rights.

Work-Related Injury or Illness

- Workers must report any work-related injury, illness or incident to their supervisor immediately, in line with TBCC's Occupational Health & Safety Policy.
- TBCC will notify its WorkCover insurer or agent and manage the claim in line with the Workplace Injury Rehabilitation and Compensation Act 2013 (Vic).

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- TBCC's General Manager is the appointed Return to Work Coordinator who has appropriate seniority and competence to manage the process.
- TBCC will provide suitable employment to a worker with a work-related incapacity, and pre-injury employment once the worker has capacity to return to it, in line with the Act.
- The General Manager will consult the worker, and with the worker's consent, their treating health practitioner, to understand their capacity, and will agree a written return to work plan covering duties, hours, equipment, modifications and review dates.

Non-Work-Related Injury or Illness

- Workers should tell their supervisor as soon as they can if an injury or illness affects their ability to work, and provide a medical certificate or clinical advice about their capacity.
- TBCC will consider modified duties, adjusted hours, equipment and a graduated return, using the same adjustment process as for disability.
- TBCC will not end a worker's employment because of a temporary absence or an injury or illness without first obtaining appropriate advice, and without considering adjustments, redeployment and the worker's rights.

Keeping Everyone Safe

- Duties offered during a return to work must be assessed for risk under TBCC's Occupational Health & Safety Policy and consistent with the worker's medical clearance.
- Fitness for work and fatigue requirements continue to apply, as set out in TBCC's Fitness For Work Policy & Procedure.

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Workforce Diversity Snapshot

TBCC monitors the diversity of its workforce as part of this policy. The figures below are based on information employees have chosen to share with us, and will be reviewed annually.

Workforce Measure	
Full-Time Permanent	35%
Part-Time Permanent	45%
Casual Employees	20%
Contractors	0%

Gender Equality	
Female Employees	52%

Age Demographic	
Aged 45+	15%
Aged under 21	5%

Indigenous Demographic	
Aboriginal / Torres Strait Islander	3%

Diversity & Inclusion	
LGBTQIA+	5%

Disability	
Disability	3%

Monitoring & Reporting

- TBCC reviews its workforce diversity data and ethical employment practices annually, and reports on progress to the Directors at least annually.
- Each year, TBCC will report on the number of employees who have chosen to identify as having disability.
- Each year, TBCC will also review its workforce profile — including the mix of permanent, part-time and casual roles, gender, age, Aboriginal and Torres Strait Islander employment, and the representation of diverse employees in leading hand, supervisory and management roles — and report the findings to the Directors. Diversity information is provided voluntarily and kept confidential.
- TBCC records the number and type of discrimination and harassment concerns raised each year, without identifying individuals, and reports how they were resolved and any improvements made.
- At each review and release of this policy, the General Manager conducts an internal audit of reasonable adjustment requests and decisions, recruitment outcomes for people with

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disability, and return to work cases, and reports the findings and any corrective actions to the Directors.

- TBCC reviews the accessibility of its website, recruitment materials and key systems at least annually.
- Any concern about working conditions, discrimination or a failure to receive lawful wages and entitlements can be raised through TBCC's Issue Resolution Policy.

Review and Updates

The General Manager is the owner of this policy and the contact point for workforce inclusion; makes or delegates reasonable adjustment decisions; ensures the annual report is completed; and holds the Return to Work Coordinator role.

This policy will be reviewed annually, or sooner if legislation, industry standards or business practice changes require it, including changes to the Disability Discrimination Act 1992 (Cth), the Sex Discrimination Act 1984 (Cth), the Equal Opportunity Act 2010 (Vic), Inclusive Employment Australia, or Victorian return to work requirements.

This policy has been endorsed by the Directors of OFG Bendigo Pty Ltd, which receives the annual workforce diversity and disability inclusion report and oversees the implementation of this policy.

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