



Complaints and Grievances Policy

Policy details			
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Policy Owner	Group P&C		
Version History			
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1. PURPOSE

1.1 This Policy aims to:

- (a) Outline the means for early complaint resolution through informal mechanisms wherever possible;
- (b) Prevent personal conflicts from becoming entrenched; and
- (c) Resolve complaints without unreasonable delay, and in an effective manner.

2. SCOPE

- 2.1 The JBS Australia Complaints and Grievances Policy applies to Baybrick Pty Ltd and its controlled subsidiaries excluding listed entities (the **Group**) and their employees (**Team Members**).
- 2.2 This policy does not apply where the subject of the complaint raised is a Qualifying Disclosure. In such circumstances, the complainant should refer to the JBS Australia Whistle Blower Policy.

3. POLICY STATEMENT

3.1 The Group strives to:

- (a) maintain a harmonious, fair and productive working environment; and
- (b) provide accessible and effective complaint resolution mechanisms to all Team Members.

4. ACCOUNTABILITIES

- 4.1 This Policy will be published and reviewed by the JBS Australia Group People & Culture Team.
- 4.2 The Group will take all reasonable steps to ensure that:
- (a) complaints are resolved in a timely manner; and
 - (b) procedural fairness is afforded to all Team Members against whom a complaint is raised.
- 4.3 Team Members have a responsibility to:

- (a) speak up if they become aware of unacceptable behaviours in the workplace; and
- (b) participate in any complaint resolution process in good faith and with a focus on achieving resolution of the concerns raised.

5. POLICY DETAILS

Preliminary steps

- 5.1 So far as reasonably practicable, Leaders should recognise the early signs of disharmony in their teams and if possible, take early, sensitive and positive steps to prevent and resolve potential or actual grievances between their Team Members.

Initiating complaints

- 5.2 Depending on the nature and severity of a Team Member's concern, The Group encourages Team Members to take one of the following steps:
- (a) If the Team Member feels comfortable doing so, approach the person directly about their conduct;
 - (b) Lodge a complaint by:
 - (i) Speaking directly with their immediate Leader or with a HR representative;
 - (ii) Calling Ethics Line on the numbers listed below. EthicsLine is a free call. It is confidential, secure and anonymous:

AUS: 1800 763 983

NZ: 0800 002 341
 - (iii) Lodging the complaint online at: jbsethicsline.jbssa.com; or
 - (iv) Putting the complaint in writing and posting it to: Group Manager, Human Resources, JBS Australia, PO Box 139, Booval QLD 4304.
- 5.3 To ensure fairness to all persons involved, all complaints must be lodged as soon as possible after the date when the problem or concern arose and usually no later than three months from the date of the most recent incident complained of.

Approaching the person directly

- 5.4 If a Team Member feels comfortable doing so, they should address the person concerned directly. Team Members should be calm and express their concerns clearly. It is important when addressing the person directly to:
- (a) tell them what they did;
 - (b) tell them how their conduct made the Team Member feel, or how it affected them; and
 - (c) clearly ask them to stop.

- 5.5 If a Team Member does not feel comfortable approaching a person directly, the conduct continues, or the complaint is serious, the Team Member:
- (a) is encouraged to raise the matter directly with their immediate Leader or with a HR representative; or
 - (b) lodge a complaint by one of the means outlined above as soon as possible.
- 5.6 The person who receives the complaint will determine which complaint resolution process outlined below is most appropriate in the circumstances.

Informal Complaint Resolution

- 5.7 Less formal and early resolution of complaints is encouraged wherever possible. This will usually be appropriate where the alleged conduct is less serious and is unlikely to result in disciplinary action being necessary.
- 5.8 Informal complaint resolution aims to resolve the matter amicably between the Team Members concerned. Actions taken to resolve the matter informally may include:
- (a) investigating the complaint on an informal basis;
 - (b) discussing the issue with the person against whom the complaint was made; and/or
 - (c) facilitating a meeting between the Team Members.

Formal Complaint Resolution

- 5.9 Formal complaint resolution will be used where the alleged conduct, if substantiated, is likely to result in disciplinary action being necessary.
- 5.10 A member of the HR team must be consulted in any matter where formal complaint resolution is being considered.
- 5.11 Formal complaint resolution will usually involve an investigation into the alleged conduct in accordance with the JBS Australia Workplace Investigations Procedure, but the specific investigation process followed will depend on the nature and severity of the alleged conduct and what is appropriate in the circumstances.
- 5.12 If the Group considers it appropriate for the safe and efficient conduct of the investigation, Team Members may be suspended or have temporary changes made to their working arrangements during the investigation.
- 5.13 The Group will endeavour to finalise all investigations in a timely and efficient manner.
- 5.14 If the alleged conduct is substantiated, the relevant Team Member may be subject to disciplinary action, up to and including termination of their employment.

6. CONFIDENTIALITY, VICTIMISATION AND VEXATIOUS COMPLAINTS

- 6.1 Strict confidentiality must be maintained at all times by all parties involved in a complaint resolution process or investigation, subject to any legal requirements for disclosure.



6.2 Victimisation of either a complainant, respondent or any other person involved in a complaint resolution process or investigation will not be tolerated by the Group. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action, up to and including termination of their employment.

6.3 If any Team Member believes they have suffered any such treatment, they should inform their HR representative as soon as possible.

6.4 The Group will not tolerate frivolous or vexatious complaints. Any person who does not make a complaint in good faith may be subject to disciplinary action, up to and including termination of their employment.

7. SUPPORT FOR TEAM MEMBERS

7.1 The Group offers free, confidential counselling support via its Employee Assistance Provider, Lifeworks.

8. PROCEDURES

8.1 Procedures may be made and amended from time to time pursuant to this Policy.

8.2 These Procedures are not intended to be prescriptive, and The Group may elect to deviate from these Procedures if it considers it is reasonable or necessary to do so in the circumstances.

8.3 The Procedures made under this Policy will be read in conjunction with any similar procedure in any applicable industrial instrument. To the extent that there are any inconsistencies between the Procedure and an applicable industrial instrument, the process described in the applicable industrial instrument will be followed.

9. NON-CONTRACTUAL STATUS OF POLICY

9.1 This Policy and any Procedures made pursuant to it are not in any way incorporated as part of any applicable industrial instrument, nor do those documents form any part of a Team Member's contract of employment. The Group may amend this Policy at any time in its sole discretion.

10. QUERIES ABOUT THIS POLICY

10.1 Team Members should contact their Leader or HR representative if they have any questions about the application of this Policy.

11. BREACHES OF THIS POLICY

11.1 Breaches of this Policy may result in disciplinary action being taken, up to and including termination of employment.

