

Dispute Resolution Policy and Procedure

Purpose

RightShip aims to investigate and resolve disputes, grievances and complaints raised by employees and workers promptly and appropriately.

This policy outlines the steps for any employee or worker who feels they have experienced inappropriate behaviour in the workplace, or who has otherwise witnessed, conduct that amounts to a breach of any of RightShip's policies, procedures or Code of Conduct or otherwise exhibits unlawful or inappropriate behaviour.

Scope

This Policy applies to all RightShip employees and workers. For purposes of this Policy "worker" means an individual performing work in any capacity for RightShip including as an employee, independent contractor, work experience student or volunteer.

The terms of this Policy do not form part of an employee's contract of employment and the policy may be varied, replaced or terminated at any time without notice at RightShip's discretion.

General principles

RightShip's dispute resolution process under this policy is:

Confidential - As far as reasonably practicable and subject to applicable laws, confidentiality will be respected and maintained during the dispute resolution process. Only people directly involved in the dispute or who are directly involved in investigating and making determinations about the dispute will have access to information about it. As far as is practicable, everyone involved in the dispute will be informed of the importance of confidentiality. Information will be stored securely and will only be placed on a personnel file if an individual is disciplined as a part of the dispute resolution process or where RightShip otherwise deems it appropriate to do so.

Impartial - RightShip aims to ensure that everyone involved in the dispute gets an opportunity to tell their side of the story. Everyone has the right to be treated fairly and to have the dispute resolved by someone who is impartial and acts fairly and in good faith. No one will make any assumptions or take any action until all relevant available information has been collected and considered.

Any person who has had a complaint or allegations made against or about them has a right to be provided with details of the complaint or allegations. Individuals involved in the dispute resolution process will have access to a support person if they request it.

Free from adverse action - RightShip will not take any adverse action, and will not tolerate any adverse action being taken, against any employee or worker in response to them making a complaint or assisting someone to make a complaint or being involved in the investigation of a complaint (for example as a witness) under this Policy or otherwise. Any substantiated victimisation will be treated seriously and may result in disciplinary action being taken up to and including termination of employment or engagement.

If any employee or worker is found to have made a complaint or grievance maliciously or in circumstances where the employee or worker knew or should have known that the complaint or grievance was false or contained false allegations, RightShip may take disciplinary action against the employee or worker, including up to termination of employment or engagement.

Dispute resolution procedure

RightShip is committed to ensuring that disputes are resolved promptly and fairly with care and understanding. Our focus is on the resolution of the dispute, not punishment.

Confidentiality and impartiality will be preserved, as far as is practicable.

Raising a dispute

Informal - RightShip encourages employees and, where relevant, workers, to discuss problems, ideas or questions with management. We have found that in most cases employees find that a frank talk with their manager is the most effective way to deal with a problem or suggestion.

However, RightShip recognises that there may be some occasions when employees and workers do not feel comfortable raising an issue with a particular manager. For example, an employee or worker may feel uncomfortable because they wish to raise a concern about the conduct of the manager or a member of the executive team. Likewise, the matters that an employee or worker wish to raise may be very serious, such as threats to their personal safety, and it would be more appropriate to go straight to Human Resources.

To the extent that an employee or worker wishes to make what he/she considers to be an "informal" complaint of any behaviour that is unlawful or otherwise in breach of RightShip policies, please be advised that RightShip may nonetheless investigate the facts alleged in such "informal" complaint if it deems it appropriate to do so.

Formal - If the results of a discussion with a manager are not satisfactory, or if, for any reason, an employee or worker does not feel comfortable raising an issue with a particular manager, employees and workers are encouraged to speak to Human Resources. While not all problems can be solved as an employee or worker might

wish, this Policy is designed to ensure that RightShip is aware of problems and responds appropriately.

If this step is taken the complainant may be required to provide, within a timeframe which will be communicated by RightShip, full details of the complaint in writing including relevant dates, times, witnesses (if any) and details of the specific allegation(s) being made.

An employee or worker's grievance may be investigated as a result of them having raised a complaint.

A supervisor who observes an incident that may constitute discrimination, harassment, victimisation or bullying or who otherwise becomes aware of such an incident, should immediately notify Human Resources, who may arrange for an investigation, if deemed appropriate.

Investigating complaints

Appropriate for Investigation - As outlined above, RightShip may request that a complaint be put in writing by an employee or worker. Once a complaint is received under this Policy RightShip may investigate the complaint, if we deem it appropriate to do so in all the circumstances.

Discreet - RightShip will endeavour to deal with any complaint or grievance that is made in a discreet manner preserving confidentiality, wherever practicable. However, this may not always be possible as it could compromise RightShip's ability to ensure a proper review or investigation is conducted, to institute remedial measures, or to act in RightShip's best interests.

Investigator - An investigation may be undertaken by a member of Human Resources or other staff member of RightShip or, where the Head of Human Resources deems it appropriate, by an external third party.

Investigation Style - Different types of complaints may call for different types of action including (where appropriate) different investigative action. However, the following is a guide as to what might happen if an investigation is to occur:

- an investigation may include a private interview with the complainant and, where appropriate, with relevant witnesses;
- the investigator may also interview the person or persons alleged to have engaged in the alleged conduct;
- when the investigation is complete, RightShip may, to the extent that it deems it appropriate, inform the complainant of the results of the investigation; and
- if it is determined that inappropriate conduct has occurred, RightShip will determine the appropriate disciplinary outcome.

Support people - If a party to the complaint elects to have a support person come to an interview, that person is not entitled to speak or advocate on their behalf. Legal counsel are not permitted to attend an interview on behalf of a party to the dispute.

No recording of interviews/meetings - Note taking is permitted during interviews and meetings. However, no party to the dispute is permitted to record any interview or meeting using audio or video recording.

Suspension - Depending on the seriousness of the complaint (and other circumstances) RightShip may decide to suspend a party to the dispute on full pay until any investigation is completed.

Written outcome report - Where an investigation has taken place the investigator may prepare (or request that any external investigator prepare) a written outcome report containing their investigation findings and possibly providing recommendations. Any such report may be shared with RightShip's compliance officer. Any such report will be prepared for RightShip's purposes only and will not be shared with the complainant or any party to the dispute unless RightShip deems it appropriate to do so.

Withdrawal of complaint or other circumstances - The complainant may withdraw a complaint or dispute at any stage or the complainant may cease employment or engagement with RightShip after making the complaint. However, if the allegations are of a serious nature, RightShip may decide to continue the investigation and take action in relation to any issues raised.

Review of Investigation - If an employee or worker wishes to have a complaint that they have raised and which has been investigated and finalised reviewed, they should contact:

- HR, if their manager or an external investigator carried out the investigation; or
- if HR conducted the investigation, the Chief Executive Officer.

Any request for a review of an investigation outcome or recommendation must be made in writing and sent to the appropriate person (see above) within 48 hours of that outcome or recommendation being communicated. A request for a review of an investigation outcome or recommendation can only be made on the basis of presenting new evidence that may reasonably impact on the outcome or recommendation.

Other action

RightShip will make an assessment on how best to manage a complaint or grievance received from an employee or worker.

RightShip may take other action in response to a complaint other than an investigation if it deems it appropriate in the circumstances to do so. Examples of other action RightShip may take include alternative dispute resolution such as mediation, coaching and counselling. Other examples of action may include disciplinary warnings, training, requirements for written apologies, or termination of employment or engagement.

Timeframes

RightShip will endeavour to deal with any complaint or grievances promptly, however, unforeseen circumstances, such as the absence of a party from the workplace, may delay any steps we propose to take under this Policy.

In any event, we may provide a likely timeframe for completion of any appropriate steps to an employee or worker who makes a complaint or grievance.

The timeline of an investigation into a complaint or grievance will vary depending on the complexity of the allegations and other factors. Below is guidance on what an investigation timeline might look like:

- an initial complaint or grievance is received;
- approximately 1-2 weeks later, an appropriate person from RightShip meets with the complainant, gathers further information and confirms the allegations being made;
- approximately 1-2 weeks after the above, an appropriate person from RightShip meets with person alleged to have engaged in the alleged conduct, puts the allegations to them and gives them an opportunity to respond;
- approximately 1-2 weeks after the above, an appropriate person from RightShip meets with any relevant witnesses to discuss their recollection of the relevant events and carries out any further inquiries;
- approximately 2-3 weeks after the above, RightShip will determine whether the complaints/allegations are substantiated and will communicate separately the outcome of the investigation to the complainant and the person alleged to have engaged in the alleged conduct; and
- if deemed appropriate, after the above steps have occurred, RightShip will take the required disciplinary or other action deemed suitable in a timely manner.

Violations

Employees who are found to have engaged in unlawful behaviour, inappropriate conduct or who are otherwise in breach of RightShip policies or procedures or its Code of Conduct may be subject to disciplinary action, up to and including termination of employment. Workers who have engaged in unlawful behaviour, inappropriate conduct or behaviour otherwise in breach of RightShip policies or procedures or its Code of Conduct may have their engagement terminated.

RightShip documents

- Bribery and Corruption Policy
- Equal Employment Opportunity, Anti-Discrimination Harassment, Bullying and Victimisation Policy
- Whistleblower Protection Policy

Procedure ownership and review

This procedure is owned by the Chief Executive Officer.

Procedure Version Control

No.	Date approved	Date effective	Section amended	Authorised by
1	May 2020	May 2020	Initial release	CEO
2	February 2023	February 2023	Review of investigation – tiered to HR then to CEO	CEO