

Ms K Toohey  
ACT Discrimination Commissioner  
ACT Human Rights Commission  
By email: [Human.Rights@act.gov.au](mailto:Human.Rights@act.gov.au)

1 April 2022

Dear Ms Toohey,

**Exemption under section 126 of the Anti-Discrimination Act 1977 –Leidos Australia Pty Limited**

I refer to the exemption order dated 27 February 2019.

In the reporting period 1 July 2021-31 December 2021 Leidos did not:

- (a) Reject any job candidates for the purpose of the US Export regulations
- (b) Retrench or redeploy any employees due to the requirements of the US Export regulation.

To comply with the Exemption Order Leidos has taken the following steps:

- Developed and implemented a procedure to identify whether roles to be advertised will require access to export controlled material;
- included in job advertisements, where a requirement of the role would involve access to ITARS controlled material, notification that one of the requirements of the role is compliance with ITAR requirements and that the role is subject to an exemption order;
- established a procedure concerning dual nationals to screen for risk of diversion;
- Security passes do not differentiate by the use of colour or other method to identify any nationality;
- Information in relation to security clearances and access to controlled technology is restricted to Leidos' employees with a need to know this information.
- Briefed team leaders as to the terms of the Exemption Order and what constitutes unacceptable behaviour;
- Made available on its Trade Compliance page a complete copy of the Exemption Order and provided a high level summary of the order, the steps Leidos must take in the event that it wishes to rely on the exemption and channels for reporting concerns;
- Revised the Leidos Australia anti-discrimination policy and grievance procedure;
- Refreshed trade compliance training and made it compulsory for all staff to undertake by 31 March 2022;
- Required all personnel to undertake Code of Conduct training which included a section concerning the company's expectation that staff would not act in a discriminatory manner.

Yours sincerely,





Ms K Toohey  
ACT Discrimination Commissioner  
ACT Human Rights Commission  
By email: [Human.Rights@act.gov.au](mailto:Human.Rights@act.gov.au)

5 May 2023

Dear Ms Toohey,

**Exemption under section 126 of the Anti-Discrimination Act 1977 –Leidos Australia Pty Limited and Gibbs Cox (Australia) Pty Ltd NI2023-12**

I refer to the exemption order dated 11 January 2023.

In the reporting period 1 July 2022-31 December 2022 Leidos did not:

- (a) Reject any job candidates for the purpose of the US Export regulations
- (b) Retrench or redeploy any employees due to the requirements of the US Export regulation.

To comply with the Exemption Order Leidos has taken the following steps:

- Developed and implemented a procedure to identify whether roles to be advertised will require access to export controlled material;
- included in job advertisements, where a requirement of the role would involve access to ITARS controlled material, notification that one of the requirements of the role is compliance with ITAR requirements and that the role is subject to an exemption order;
- established a procedure concerning dual nationals to screen for risk of diversion;
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