

HARASSMENT & DISCRIMINATION POLICY

POLICY

NZPM is committed to ensuring the workplace is free from harassment and unlawful discrimination. Harassment or unlawful discrimination of co-workers, customers or suppliers is unacceptable and will not be tolerated. It is the Company's expectation that employees are treated fairly and equitably and that managers take positive steps to prevent harassment and unlawful discrimination. Complaints will be acted upon as promptly as reasonably possible and investigated thoroughly. The Company encourages, and is committed to achieving, internal resolution of issues where possible.

This policy applies to behaviours that occur within the workplace, during work hours, in connection with work, and on social media. It sets out the actions and behaviours that could be considered harassment or unlawful discrimination and how NZPM may respond.

HARASSMENT

Harassment occurs when a person is subjected to behaviour that is unreasonable, unwanted or offensive, and that either by its nature or through repetition, has a detrimental effect on the person's health, safety and wellbeing, employment, job performance or job satisfaction.

Unreasonable behaviour means behaviour that a reasonable person, having considered the circumstances, would see as unreasonable. Examples of harassment include:

- Threats and intimidation;
- Verbal abuse including jokes, suggestive comments and offensive gestures relating to a person's disability, religious conviction, race, colour, gender, ethnic or national origins or sexual characteristics;
- Humiliation and/or degrading comments;
- Distribution or display of material regarded as offensive; and
- Repeated, unwanted and deliberate physical contact.

Harassment can be a one-off serious incident or can be repeated behaviour of a less serious nature, or a combination of behaviours. Harassment can also occur through social media, written material such as notes, electronic messages, voicemail, phone and/or video calls inside or outside of the workplace and/or work time.

Sexual Harassment

Sexual harassment includes any unwanted or unwelcome sexual behaviour that makes a person feel offended, humiliated, intimidated or uncomfortable. Sexual harassment in the workplace includes:

- Use of language (written or spoken), visual material or physical behaviour of a sexual nature that is unwelcome or offensive; and
- Requests for sexual intercourse, sexual contact or other form of sexual activity that is unwanted, offensive or, if that request is accompanied by either a promise of some kind of preferential treatment, or a threat (or implied threat) of some kind of detrimental treatment, either directly or by implication.

Any allegations of sexual harassment will be notified to the Board in the monthly reporting.

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Racial Harassment

Racial harassment includes unwanted, hurtful or offensive behaviour towards another person on the grounds of their race, colour, or ethnic or national origins. Racial harassment in the workplace includes use of language (written or spoken), visual material or physical behaviour expressing hostility, contempt or ridicule towards a person's race, colour or ethnic or national origins, religious or political beliefs.

Workplace Bullying

Workplace bullying is a form of harassment that intimidates, humiliates or undermines and creates a risk to health, safety and wellbeing. Behaviour is generally repeated or persistent and can involve a range of behaviours over time. Bullying behaviour can range from verbal or physical assault to subtle psychological abuse and includes direct violence, physical assault or intimidation, abusive language, passive aggression, and behaviour that insults, victimises, or threatens.

Genuine and reasonable performance management and/or disciplinary action are not considered to be workplace bullying. One-off incidents of unreasonable behaviour including forgetfulness, rudeness or tactlessness are also not considered to be workplace bullying. A single serious incident, however, may constitute harassment and/or a breach of company policy, and accordingly such behaviour is not acceptable.

DISCRIMINATION

Discrimination occurs when a person is treated less favourably than others either directly or indirectly, in the same or similar circumstances. Unlawful discrimination occurs where the reasons for that discrimination are prohibited under human rights legislation. Prohibited grounds include:

- Gender
- Age
- Marital status
- Family status
- Race
- Colour
- Ethnic or national origin
- Religious or ethical belief
- Political opinion
- Employment status
- Disability
- Sexual orientation

RESPONSIBILITIES

Managers are responsible for ensuring a workplace free from harassment and discrimination. This responsibility includes the behaviour of themselves, company representatives, employees, customers and suppliers.

Employees are responsible for ensuring their behaviour is consistent with this policy and are not expected to tolerate any form of harassment or discrimination. Should harassment occur, the complaints procedure is to be applied.

An employee experiencing workplace harassment or discrimination is entitled to raise a complaint.

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Employees are encouraged in the first instance, to tell the person that their behaviour is unwelcome and offensive and ask them to stop. Employees may then report the issue to their manager, or if preferred approach a member of the Human Resource team to make a formal complaint.

In the event that an employee is not comfortable using the above channels, we provide a Speak Up line that employees can call and report their concerns anonymously.

REPORTING

Where an employee reports an issue to their manager or a member of Human Resources, the issue must then be reported through that management line up to the Head of People and Safety.

The Head of People and Safety must then report the issue to the CEO.

Reported issues and/or formal complaints will be assessed and may be reported to the Board on the judgement of the CEO, excluding Sexual Harassment complaints which will all be reported to the Board.

FORMAL COMPLAINTS

NZPM management has overall responsibility for the prevention of harassment and discrimination. Formal complaints will be treated seriously and investigated as fairly and as promptly as possible. Employees will be provided with necessary support while the process is resolved. The complainant, witnesses and the person accused of acting inappropriately are entitled to seek advice and support at any time.

All instances of suspected or alleged harassment and discrimination will be thoroughly investigated. The primary responsibility for investigating all suspected harassment and discrimination is with the Human Resource team. NZPM is committed to our legal and moral obligations to act fairly, honestly and in good faith when conducting investigations. All employees must cooperate with any investigation into suspected harassment, bullying and/or discrimination.

If it is found that harassment or discrimination has occurred, all practicable steps will be taken to ensure that the offending behaviour is not repeated. Disciplinary action up to and including summary termination of employment may be taken against anyone found to be harassing or discriminating against an employee, customer or supplier.

It is important to note that NZPM may not be able to take formal action against alleged workplace harassment, unlawful discrimination or bullying unless the company can provide the person alleged to have acted inappropriately with details of who the complainant is and the behaviour(s) complained of. Complaints that are made "off the record" or "in confidence" may not be able to be investigated.

NZPM may choose not to conduct an investigation or take any action where it considers the behaviour(s) complained of do not, even if proven, constitute harassment, bullying or unlawful discrimination. If an investigation reveals that the complaint is vexatious, frivolous or malicious or that the allegations are not true or not in good faith, NZPM may take disciplinary action against the complainant.

Anyone involved in a harassment or discrimination issue must ensure that the circumstances and

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facts of the issue are disclosed only to those within NZPM who are directly involved in investigating and/or resolving the issue or have a 'need to know' (e.g., a lawyer or external representative). In particular, it is important that anyone who either makes a complaint or may be witnesses to the circumstances giving rise to a complaint, does not discuss the matter outside of the investigation and resolution processes.

EMPLOYEE ASSISTANCE PROGRAM

In some circumstances, an employee may wish to seek confidential counselling services. OCP can be used to address issues of a work or personal nature that may be impacting on health and wellbeing. The OCP contact details are available from the intranet, your manager or a member of the HR team.

POLICY OWNERSHIP

Reviewed by: Compliance Committee - 17 July 2025

Approved by: NZPM Board – 24 July 2025

Policy review date: July 2028