

Discrimination, Bullying and Harassment Prevention Policy

1) Introduction

We are committed to maintaining a positive and inclusive working environment and culture, where diversity is appreciated, and all people are respected and valued.

We have zero tolerance of all forms of discrimination, bullying and harassment. This applies whether this behaviour comes from, or is directed at, an employee, contractor, consultant, customer, supplier or a visitor to Promisia.

We foster an environment in which the risk of discrimination, bullying or harassment is actively managed. In the event of a complaint, appropriate action will be taken.

2) Application

This policy applies to all directors, and all employees (including any secondee, temp, contractor or consultant) of Promisia and its subsidiaries (collectively 'employees' or 'our people'). Behaviour or actions from employees or those representing Promisia that are in conflict with this policy may be considered serious misconduct or grounds for termination of contract for non-employees.

Outlined expectations also apply to visitors and other people present on Promisia work sites, using our facilities, or dealing with our employees or contractors. Where these parties are in conflict with the policy, appropriate action will be taken.

The policy applies at all times in work related situations and is not restricted by work hours or other time or place considerations.

3) Key Principles

In this policy, discrimination and harassment are defined as per the Human Rights Act 1993 and the Employment Relations Act 2000 (ERA) definitions, which are summarised below.

Bullying: Behaviour that most people would consider unwelcome, offensive, humiliating or intimidating and that potentially creates a health and safety risk.

- Repeated behaviour is persistent and can include a range of actions.
- Unreasonable behaviour covers actions which a reasonable person wouldn't do in similar circumstances, including victimising, humiliating, intimidating or threatening a person. A single incident isn't considered bullying but can escalate if ignored.

Bullying includes cyberbullying - where technology (internet, mobile phone, digital camera etc.) is used as a means to bully. The Harmful Digital Communications Act (2015) sets out serious consequences if electronic communications are used with the intent to cause harm, and includes 10 communication principles, many of which relate specifically to harassing, discriminatory or bullying behaviour.

Discrimination: Where a person is treated differently on the grounds of sex, marital status, religious belief, ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status or sexual orientation.

Harassment: Where a person is subjected to repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, at the place of work and/or in the course of employment that:

- expresses hostility against or intimidates or ridicules them.

- is unwanted, hurtful and offensive to the employee, and affects their performance or job satisfaction.

This is most commonly sexual or racial harassment but can include other forms.

NOTE: These terms are not mutually exclusive, so harassment and discrimination can be part of bullying.

4) Response to discrimination, bullying or harassment

We encourage our people to identify and report any instances of discrimination, bullying or harassment.

In the event where inappropriate behaviour or actions are observed or experienced, people should advise their direct manager, business unit leader or Chief Executive Officer as soon as possible. Complaints may be made informally or formally.

We treat all discrimination, bullying or harassment complaints seriously and ensure they are dealt with impartially confidentially and within a realistic timeframe.

A person alleging with bullying or discrimination, also has the option of taking the allegations directly to statutory bodies such as the Human Rights Commission or WorkSafe NZ.

5) Consequences

If discrimination, bullying or harassment is found to have taken place appropriate action will be taken. Such action may include summary dismissal, or termination of contract for non-employees.

6) Prevention

This policy, and the Bullying, Harassment & Discrimination Procedure are in place to ensure all our people:

- Understand Promisia's commitment to a positive workplace and that unacceptable behaviour will not be tolerated under any circumstances,
- Have access to the information and resources they need to better understand discrimination, bullying and harassment,
- Know how to raise a concern or complaint, and the options available.

7) Compliance

Compliance with this policy will be periodically monitored by the Chief Executive Officer.

Any known or suspected instances of non-compliance should be discussed with your manager, business unit leader or the Chief Executive Officer. Alternatively, any employee who is aware of a breach of this policy can take action in accordance with Promisia's Protected Disclosures (Whistleblowing) Policy.

8) Accountabilities

All our people have a responsibility to ensure discrimination, bullying or harassment is identified and to foster a positive and inclusive working environment and culture, where diversity is appreciated, and all people are respected and valued.

Leaders have a responsibility to ensure that all their people (including temps, secondees and contractors) are aware of this policy and the accompanying procedure and feel safe to raise any concerns at an early stage so they can be dealt with appropriately.

Document control
Approved: May 2021 Review date April 2023 Approver: Promisia Limited Board Document owner: Chief Executive Officer