



Discrimination, Bullying and Harassment Prevention Policy

1) Introduction

Promisia Healthcare Limited (**Promisia**) is committed to maintaining a safe, respectful, and inclusive work environment where all individuals are treated with dignity and fairness. We value diversity and are united in our stance of zero tolerance for any form of discrimination, bullying, or harassment.

This commitment extends to all individuals who interact with our business — including employees, contractors, residents, whānau, suppliers, and visitors.

We actively manage the risk of inappropriate behaviour through prevention, education, and a fair response process. Concerns or complaints will be taken seriously and addressed promptly, in alignment with our values and legal obligations.

2) Application

This policy applies to all directors, officers, employees (including secondees, temporary staff, contractors and consultants), and any person engaged to perform work or represent Promisia or its subsidiaries.

The expectations outlined in this policy also apply to visitors, residents, whānau, and other third parties while on Promisia premises or interacting with our people.

The policy applies to all work-related interactions — including those that occur outside regular working hours or off-site — and reflects our responsibility to provide a safe and respectful workplace under the Health and Safety at Work Act 2015, Human Rights Act 1993, and Employment Relations Act 2000.

Breaches of this policy may be considered serious misconduct and may result in disciplinary action, up to and including dismissal or termination of contract.

3) Key Principles

Promisia is committed to ensuring all our people can work in an environment free from discrimination, bullying, and harassment. These behaviours can cause serious harm and may breach several pieces of legislation including the Human Rights Act 1993, Employment Relations Act 2000, Health and Safety at Work Act 2015, and the Harmful Digital Communications Act 2015.

Below are working definitions that guide this policy and support alignment with our legal and ethical obligations:

Bullying

Repeated and unreasonable behaviour directed towards a person or group that creates a risk to health and safety.

- Repeated means persistent and occurring more than once.
- Unreasonable refers to actions that a reasonable person would see as victimising, humiliating, intimidating, or threatening.

Bullying may be verbal, physical, social, or psychological and includes cyberbullying (e.g. harmful use of email, messaging apps, or social media). The Harmful Digital Communications Act 2015 outlines serious consequences for online conduct intended to cause harm.

Discrimination

Unfavourable treatment based on one or more of the prohibited grounds of discrimination under the Human Rights Act 1993, including:

sex, marital status, religious or ethical belief, colour, race, ethnic or national origin, disability, age, political opinion, employment status, family status, or sexual orientation.

Harassment

Unwanted behaviour — verbal, physical, written, or visual — that offends, humiliates or intimidates a person and is either repeated or so significant that it creates a hostile environment.



This includes:

- Sexual harassment: Unwelcome conduct of a sexual nature.
- Racial harassment: Hostile or insulting behaviour based on race, ethnicity or nationality.

Harassment can also form part of broader bullying or discriminatory conduct.

Note: These behaviours often overlap. For example, harassment may also be discriminatory or bullying in nature. Promisia treats all such behaviours with equal seriousness.

4) Raising Concerns and Responding to Inappropriate Behaviour

Promisia encourages anyone who experiences or witnesses discrimination, bullying or harassment to speak up early — even if unsure whether the behaviour breaches this policy. Concerns may be raised formally or informally, and all reports will be treated seriously, fairly and with appropriate confidentiality.

People can raise concerns with their direct manager, facility manager, Chief Operating Officer (**COO**), or Chief Financial Officer (**CFO**), depending on the context and comfort level. Support is also available via Human Resources.

We commit to investigating all complaints in a timely, respectful and impartial manner. Where appropriate, resolution may include mediation, informal intervention, or formal investigation.

All investigations will follow natural justice principles, as outlined in the Protected Disclosures (Whistleblowing) Policy.

Individuals may also choose to raise concerns externally, including to the Human Rights Commission, WorkSafe New Zealand, or the Employment Relations Authority.

Retaliation or victimisation of any person who raises a concern in good faith is prohibited and may itself constitute serious misconduct.

5) Consequences of Breaching this Policy

If an investigation confirms that discrimination, bullying or harassment has occurred, appropriate disciplinary action will be taken in accordance with Promisia's employment and conduct policies.

Depending on the severity of the conduct, consequences may include:

- formal warnings;
- training or supervision;
- transfer or reassignment; and
- termination of employment or contract (including summary dismissal)

For non-employees (e.g. contractors, consultants or visitors), Promisia may restrict access to its sites, end contractual arrangements, or take other appropriate measures.

6) Prevention and Awareness

Promisia takes a proactive approach to preventing discrimination, bullying and harassment. This includes ensuring that all our people:

- Understand Promisia's commitment to a safe, inclusive and respectful workplace, and know that inappropriate behaviour will not be tolerated under any circumstances.
- Receive appropriate training and access to guidance materials to help recognise and prevent harmful behaviour.
- Know how to raise concerns, the support available, and what to expect from the response process.



7) Compliance

Promisia's leadership team, including the COO and CFO, is responsible for ensuring ongoing awareness of and compliance with this policy across all sites.

Known or suspected breaches should be reported to your manager, facility manager, COO or CFO.

Any person who feels unable to raise a concern through usual channels may do so under Promisia's Protected Disclosures (Whistleblowing) Policy, which allows confidential reporting of serious misconduct or wrongdoing.

Policy compliance may be monitored periodically and reviewed following any significant incident, regulatory change, or operational shift.

8) Roles and Responsibilities

At Promisia, every person has a role to play in upholding a safe, inclusive and respectful workplace.

All our people are expected to:

- Treat others with dignity and fairness.
- Speak up early if they experience or witness inappropriate behaviour.
- Cooperate with any investigation or resolution process.

Leaders and managers are responsible for:

- Ensuring all team members (including contractors, temps and secondees) are familiar with this policy and know how to raise concerns.
- Responding promptly and appropriately to complaints or early signs of concern.
- Fostering a culture where unacceptable behaviour is addressed and psychological safety is prioritised.

The COO and CFO are accountable for the policy's implementation, ongoing oversight, and periodic review.

This policy should be read in conjunction with Promisia's:

- Group Code of Ethics;
- Diversity and Inclusion Policy,
- Protected Disclosures (Whistleblowing) Policy; and
- Corporate Governance Code.

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