

Non-Discrimination and Anti-Harassment Policy

Approved date	15 May 2024
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1. INTRODUCTION, PURPOSE AND CONTEXT

Under Meridian's Non-Discrimination and Anti-Harassment Policy ("Policy"),

- **Discrimination, sexual harassment, other harassment and bullying are unacceptable.**
- **Meridian does not tolerate any form of discrimination, harassment or bullying, as defined below.**

It is backed up by Meridian's [Code of Conduct](#) with which all employees are required to comply. This includes that:

- Discrimination is unacceptable.
- Any form of harassment or bullying is unacceptable.

Specifically, the Code of Conduct states:

We value diversity and inclusion

Meridian is dedicated to upholding an inclusive environment where individual differences are valued and respected and everyone is treated fairly, with dignity, and with respect. Discrimination is unacceptable.

We provide a professional and safe work environment

Meridian is committed to maintaining a professional and safe work environment. Verbal or physical behaviour that is not appropriate in a professional working environment, or behaviour that makes others feel uncomfortable in their workplace, is not acceptable.

Meridian does not tolerate any form of harassment or bullying. This includes any uninvited or unwelcome behaviour which offends, humiliates or intimidates another person either in the workplace or at work-related functions.

Under Meridian's [Belonging \(Diversity and Inclusion\) Policy](#)

'Meridian is dedicated to creating an inclusive environment where all of our employees are encouraged to reach their full potential, and individual differences are valued and respected'.

Definitions

Discrimination under the Human Rights Act 1993, is generally unlawful if you're treated unfairly or less favourably than another person because of your:

- age
- colour
- race

- disability, includes illness
- employment status
- ethical belief
- ethnic or national origin
- family status
- marital status
- political opinion
- religious belief
- sex
- sexual orientation.

Harassment is inappropriate behaviour of one or more persons towards another person (directly or indirectly), that is unwanted, offensive to them, and which is either a significant single incident or is repeated such that it has a negative effect on their employment, job performance or job satisfaction.

Bullying is repeated and unreasonable behaviour directed towards a worker or a group of workers that can lead to physical or psychological harm.

2. SCOPE AND FIT

This policy applies to all Meridian Group employees, contractors and Directors.

This policy may be reviewed and amended, replaced or withdrawn by Meridian at any time.

3. POLICY STATEMENT

Under this Policy,

- **Discrimination, Sexual harassment, Harassment and Bullying are unacceptable.**
- **Meridian does not tolerate any form of Discrimination, Harassment or Bullying.**

We require all Meridian employees to undertake training on the requirements under this Policy. This training is included in our Code of Conduct training.

We encourage our people to report any instances of Discrimination, Harassment or Bullying that they see or experience at work, or in a Meridian context. This includes Discrimination or Harassment by, or toward, employees, contractors, customers or other external parties.

Complaints about Discrimination, Harassment or Bullying will be treated seriously, dealt with fairly and appropriately, and within a reasonable timeframe (see process below).

Appropriate action (which may include disciplinary action) will be taken against person(s) determined by Meridian to have engaged in Discrimination, Harassment and/or Bullying under this Policy.

Complaint Processes

Employees may instigate a Discrimination, Harassment or Bullying complaint / concern by:

- contacting and reporting it to your Manager, your Manager's manager, a General Manager, the Chief People Officer, the General Counsel or a member of the People Team or Legal Team.

- following the procedure set out in Meridian's **Whistleblowing Policy** <https://www.meridianenergy.co.nz/public/Investors/Governance/Policies/2023/Whistleblowing-Policy.pdf>
- contacting the New Zealand **Human Rights Commission** <https://tikatangata.org.nz/resources-and-support/make-a-complaint>
- contacting Worksafe NZ <https://www.worksafe.govt.nz/notifications/report-an-unsafe-or-unhealthy-work-situation/health-or-safety-concern/>

Once a complaint is made, Meridian will consider the complaint and an investigation of the matter may be undertaken. In some cases, it might be appropriate for Meridian to engage an independent third party to conduct the investigation. In other cases, Meridian may conduct the investigation internally.

We will do our utmost to ensure that a Meridian person is not victimised as a result of making a complaint in good faith. If you feel that you have experienced victimisation, you should immediately report it to a senior manager or the People Team.

The Protected Disclosures (Protection of Whistleblowers) Act 2022 provides protection to people who disclose serious wrongdoing in accordance with that Act. Meridian's Whistleblowing Policy offers a reporting and investigation mechanism that protects a person who makes a disclosure, from reprisal or disadvantage.

The Outcome

Where Discrimination, Harassment or Bullying under this Policy is substantiated, one or more of the following outcomes may occur to the person(s) deemed to be at fault: remedial action, disciplinary action (including dismissal), or legal action.

Malicious, Vexatious or Frivolous Complaints

If it appears that a complaint under this Policy is malicious, vexatious or frivolous or otherwise made in bad faith (i.e. it appears that the complainant is lying about the allegation, or it is obviously untrue), this will be investigated and as a result there may be grounds for disciplinary action against the complainant.

What should you do if you are accused of Discrimination, Harassment or Bullying?

If someone tells you that your words or actions are considered to be harassment or bullying, it is important that you treat this seriously - pause, consider their point of view, and the impact your behaviour is having on them. What is not offensive to one person may be offensive to another, even if done in jest. Seek advice from your manager or People Team member if you believe you are being unfairly accused.

If a formal complaint has been made about you, you are entitled to information about what it is that you are said to have done. You will be given an opportunity to respond to the allegations before any disciplinary action is taken. You are also entitled and encouraged to seek independent advice and to have representation, such as a support person, present during any formal meeting that may occur.

What should you do if you witness an employee harassing a Meridian person, or being harassed at work by a Meridian person, customer, supplier, contractor etc?

Take immediate steps (including seeking help from others) to ensure the person's safety, if that appears to be at risk.

Depending on the circumstances, either discuss the situation with the people involved, and/or a People Team member or a Meridian manager. If you are concerned about what you saw, you are encouraged to speak to your Manager or People Team member who will have further information about what can be done to support the victim and/or what other steps can be taken.

4. **RESPONSIBILITIES**

Chief People Officer

Ownership of this policy

Meridian Managers

Apply the provisions of this policy, role-model appropriate behaviour, respond to complaints made in accordance with this policy and associated Guidelines.

Employees and contractors

Comply with the provisions of this policy and related provisions (e.g. Code of Conduct), undertake training on this policy.

5. **MORE INFORMATION**

Meridian's Harassment and Bullying Guidelines is accessible to all employees and contractors, and includes further information.