



Anti-Discrimination and Equal Employment Opportunity (EEO) Policy

**nib holdings limited ABN 51 125 633 856 and all related entities
within the nib Group (“the nib Group”) or (“nib”)**

Dated 22 August 2025



1. Scope

Our Anti-Discrimination and Equal Employment Opportunity (EEO) Policy applies to all directors of the Board, as well as all officers, executives, leaders, employees, candidates, contractors, consultants and associates of nib, excluding the Honeysuckle Health Group which is subject to a separate policy.

2. Policy Statement

nib is committed to providing an equitable and inclusive work environment where everyone is treated fairly and with respect.

nib views all forms of discrimination, harassment, sexual harassment, bullying, victimisation and vilification as extremely serious. Allegations or complaints of this behaviour will be treated seriously, investigated and dealt with promptly, in accordance with nib's Grievance Policy and Performance Management and Discipline Policy.

nib will take all reasonable steps to ensure that employees are treated fairly with dignity and respect, and to maintain an environment that supports employee psychological safety.

3. Principles

nib has zero tolerance for discrimination, harassment, sexual harassment, bullying, victimisation or vilification. This includes (but is not limited to) *direct or indirect* discrimination on the basis of gender, race, nationality, religion, colour, language, marital or family status, gender identity, sexual orientation, transgender status, intersex status, age, compulsory retirement, disability, personal associations, political beliefs, family responsibilities, pregnancy, breastfeeding, carer's and family responsibilities, membership or non-membership of a trade union and being, or having been, subjected to family and domestic violence.

3.1 Racial Discrimination

nib is committed to providing a working environment free from racism, racial discrimination, harassment, sexual harassment and vilification and to ensuring that our employees, clients and customers are not disrespected because of their race (including colour, nationality, descent or ethnic or ethno-religious or national origin).

We recognise that in order to treat all employees and candidates equitably, adjustments to processes and practices may be required and as a result, nib may use special measures for Aboriginal and Torres Strait Islander and Māori candidates and/or employees to mitigate the inequities faced by First Nations and Indigenous peoples living in Australia and New Zealand.

3.2 Equal Employment Opportunity

nib is committed to the principles and practice of Equal Employment Opportunity (EEO). We believe in having a workplace in which all our people enjoy equal opportunity to jobs, advancement, career development and employee experience. Unlawful discrimination, harassment, sexual harassment, bullying, victimisation and vilification contravene the principles of EEO and will not be tolerated.



Our EEO principles mean that nib will:

- Assess all policies and practices (including any Enterprise Agreement(s) where applicable) to ensure consistency with the EEO principles and commitments outlined in this Policy;
- Ensure that our employment practices support EEO, including gender equality, including but not limited to:
 - Employment and engagement of employees;
 - Engagement of independent contractors;
 - Performance review processes;
 - Restructure and significant operational changes, such as redundancies; and
 - Training for leaders on dealing with resistance to gender equality initiatives.
- Ensure that recruitment, selection and promotion practices are appropriately structured so that a diverse range of candidates are considered and that leaders making these decisions are mitigating any
- conscious or unconscious biases that might discriminate against a person on any attribute outlined in this Policy or under anti-discrimination laws;
- Provide employees with equal opportunity to access to training, learning and personal development opportunities, providing an environment where all our people are supported to achieve their full potential and have equitable access to opportunities to learn, develop and grow;
- Create a work environment that is accessible to all and provides flexibility to accommodate the diverse needs of our people so that they have equitable and consistent access to flexibility to balance work and personal needs;
- Provide a work environment and workspaces that ensure the psychological and physical health, safety and wellbeing of our people, members, visitors and contractors across all sites and operations;
- Maintain formal grievance procedures for dealing with claims of discrimination, harassment, sexual harassment or other inappropriate behaviour and ensure individuals who express any concerns can do so without fear of retaliation, penalty or personally negative consequences;
- Where behaviour not in line with this Policy such as bullying, harassment, sexual harassment and/or discrimination has been found to have taken place, nib will take corrective or disciplinary action; and
- Communicate this Policy and deliver training to all employees and leaders on bullying, harassment, sexual harassment and discrimination to ensure they are all aware of their obligations and understand nib's commitment to EEO and anti-discrimination.

3.3 Raising Concerns about Discrimination, Harassment and Sexual Harassment

3.3.1 Internal reporting

Any person has the right to raise a concern, make a complaint and take action to report discrimination, harassment, sexual harassment, bullying, victimisation and vilification.

nib's grievance resolution policies and procedures provide a basis for resolving work-related concerns or grievances promptly, impartially, justly and with appropriate sensitivity. The policies outline the informal and formal steps to be taken to promptly resolve issues that may arise in the workplace. All grievances will be treated seriously and confidentially to the extent allowed by law. Employees should refer to nib's grievance resolution policies and procedures for instructions on how to raise a concern or make a complaint.

nib have a duty of care towards all our employees, and if we believe that the health and safety of our workforce is at risk then we may decide to investigate even if a formal report has not been made.

3.3.2 External reporting

Where the person making a complaint does not feel comfortable making an internal report, or where an employee has made an internal report, but no action has been taken within a reasonable time, a report can be made using nib Group's external independent whistleblower service in alignment with our [Whistleblower Policy](#).

Our whistleblower service is also available to any external party who has a concern or complaint to make regarding discrimination, harassment, sexual harassment, bullying, victimisation and vilification.

A person may also choose to take a complaint of discrimination, harassment or sexual harassment to the relevant government bodies such as the:

- Australian Human Rights Commission;
 - New Zealand Human Rights Commission;
 - Irish Human Rights and Equality Commission;
 - UK Equality and Human Rights Commission;
 - US Federal Equal Opportunity Commission;
 - Californian Civil Rights Department; or
 - The relevant equal opportunity commission at any time.
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4. Responsibilities

4.1 Leaders

Leaders are responsible for:

- Promoting a workplace that is free from any form of discrimination, harassment, sexual harassment, bullying, victimisation and vilification;
- Ensuring that all employees know their rights and responsibilities in order to provide and experience a safe, respectful and inclusive work environment;
- Providing opportunities for employees to resolve complaints in a fair, timely and confidential manner;
- Maintaining open lines of communication and allowing employees to express any concerns without fear of retaliation, penalty or personally negative consequences; and
- Reporting any incidents that breach this Policy and ensuring that appropriate action is initiated as soon as possible after an issue is reported.

4.2 Employees

Employees are responsible for:

- Complying with this Policy at all times and reporting any incidents that breach this Policy and ensuring that appropriate action is taken as soon as possible after an issue is reported;
- Respecting the rights of other employees, clients, customers, contractors and visitors to freedom from unlawful discrimination, harassment, sexual harassment, bullying, victimisation and vilification; and
- Always considering how their behaviour will be viewed by the person or people affected by it. It is sometimes difficult to know whether a person will find the behaviour acceptable, and some people will be offended by behaviour that does not offend other people.

4.3 People and Culture

People and Culture are responsible for:

- Providing regular reporting to the MD/CEO and Board on the number and prevalence of formal and informal complaints of bullying, discrimination, harassment and sexual harassment; gender of complainant and accused; nature of incidents; outcomes of investigations; and actions to prevent and respond to complaints;
- Supporting any impacted employee and understanding how they would like the issue managed;
- Ensuring nib's grievance resolution policies and procedures are followed; and
- Taking all reasonable steps to ensure confidentiality is maintained.

4.4 Board and Executive

Our Board and Executive are responsible for:

- Ensuring discrimination, harassment, sexual harassment, bullying, victimisation or vilification prevention and early intervention are a leadership priority and organisational systems are in place to support this; and
 - Requiring regular reporting of frequency and nature of incidents.
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5. More Information

5.1 Related Documents

This Policy should be read in conjunction with the following documents:

- [Code of Conduct](#)
- [Corporate Governance Statement](#)
- [nib Group Diversity, Equity and Inclusion Action Plan FY24-26](#)
- [Diversity, Equity and Inclusion Policy](#)
- [nib Innovate Reconciliation Action Plan](#)
- [Human Rights Statement](#)
- [Health, Safety and Wellbeing Statement](#)
- [Sexual Harassment Policy](#)
- [Whistleblower Policy](#)
- [Media and Social Media](#) Policy (internal only)
- Grievance Resolution [Policy](#) and [Procedure](#) (internal only)
- Grievance Procedures in employee handbooks (internal only)
- Performance Management & Discipline [Policy](#) and [Procedure](#) (internal only)

5.2 Definitions

Term	Meaning
Equal Employment Opportunity	EEO refers to the principle that all individuals should receive fair and equal treatment in the workplace and have access to equal employment opportunities.
Discrimination	The law prohibits discrimination against an employee, customer, client, contractor or supplier of nib for any unlawful reason. Legislation in each jurisdiction prohibits discrimination on the basis of various grounds, which may differ between countries, states and territories. Under this Policy, and applicable law, you must not discriminate on the grounds of: • Age, compulsory retirement; • Disability or accessibility need; • Race, including colour, national or ethnic origin or immigrant status; • Religion; • Sex, pregnancy, marital or relationship status, carer or family responsibilities or breastfeeding; • Sexual orientation, gender identity, transgender status or intersex status; • Political beliefs, personal associations, membership or non-membership of a trade union; and/or • Being, or having been, subjected to domestic or family violence There can be two forms of discrimination. These are direct and indirect discrimination. Both are unlawful.
Direct Discrimination	Discrimination happens when a person, or a group of people, is treated less favourably than another person or group because of their background or certain personal characteristics. This is known as 'direct discrimination'.
Indirect Discrimination	Indirect discrimination occurs when there is an unreasonable rule or policy that is the same for everyone but has an unfair effect on people who share a particular attribute. Example: It could be indirect sex discrimination if a policy says that managers must work full-time, as this might disadvantage women because they are more likely to work part-time because of family responsibilities. Example: It could be indirect disability discrimination if the only way to enter a public building is by a set of stairs because people with disabilities who use wheelchairs would be unable to enter the building. Indirect discrimination is unlawful if the discrimination is based on certain attributes protected by law, such as a person's race, sex, pregnancy, marital or relationship status, breastfeeding, age, accessibility need, sexual orientation, gender identity or intersex status.
Harassment	Harassment is any unwelcome behaviour that offends, humiliates or intimidates a person. Harassment can be against the law when a person is treated less favourably on the basis of certain personal characteristics, such as race, sex, pregnancy, marital status, breastfeeding, age, accessibility need, sexual orientation, gender identity or intersex status. Harassment can include behaviour such as: • Telling insulting jokes about particular racial groups; • Sending explicit or sexually suggestive emails or text messages; • Displaying racially offensive or pornographic posters or screen savers; • Making derogatory comments or taunts about someone's race; • Asking intrusive questions about someone's personal life, including their sex life; and/or

- Having unwanted discussions about social policies or politics that a person might be connected to by a personal characteristic such as their race, religion, sexual preference or gender identity etc.

The law also has specific provisions relating to certain types of harassment.

- Sexual harassment is any unwanted or unwelcome sexual behaviour where a reasonable person would have anticipated the possibility that the person harassed would feel offended, humiliated or intimidated. It has nothing to do with mutual attraction or consensual behaviour;
- Harassment linked to the accessibility needs of a person or their associate is against the law; and
- Offensive behaviour based on racial hatred is against the law. Racial hatred is defined as something done in public that offends, insults, humiliates or intimidates a person or group of people because of their race, colour or national or ethnic origin.

Conduct can also be harassment even if the "harasser" does not mean to do anything that could be perceived as harassment (i.e. has no intention to offend, humiliate or intimidate). In some cases, if the conduct is serious enough, a single action can be harassment.

Sexual Harassment

Sexual harassment is any unwanted or unwelcome sexual behaviour where a reasonable person would have anticipated the possibility that the person harassed would feel offended, humiliated or intimidated.

It has nothing to do with mutual attraction or consensual behaviour.

Examples of sexual harassment include:

- Unwelcome sexual advances or conduct of a sexual nature;
- Unwelcome physical contact such as touching, hugging, cornering or kissing;
- Staring, leering or stalking;
- Using suggestive or sexualised nicknames for colleagues;
- Making suggestive comments or sexually oriented jokes, innuendoes or having sexually explicit conversations;
- Sexual innuendo specifically targeting sexual orientation, gender identity or intersex status;
- Unwanted or persistent invitations to go out on dates or requests for sexual favours;
- Intrusive questions or unwelcome assumptions or commentary about a person's private life, sexual orientation, gender identity or body;
- Unnecessary familiarity, such as deliberately brushing up against a person;
- Displaying images of a sexual nature around the workplace;
- Displaying inappropriate materials designed to intimidate colleagues; and

Communicating content of an indecent or sexual nature, such as pornography or rude jokes, through social media or messaging or communication platforms.

Other types of harassment

Other types of unlawful harassment may include but are not limited to:

- Verbal abuse and comments that put down or stereotype people because of, for example, their race, sexual orientation, pregnancy, accessibility requirements or need, age, physical features etc.;
- Jokes based on race, sexual orientation, pregnancy, accessibility needs or requirements, age etc.;
- Imitating or making fun of someone's accent, or the habits of someone with an accessibility need;

	• Offensive gestures based on race, sexual orientation, pregnancy, accessibility needs or requirements, age etc.; • Ignoring or isolating a person or group because of their race, sexual orientation, pregnancy, accessibility needs or requirements, age etc.; • Threats or insults; • Display or circulation of racist or other offensive material; and/or Display of hostility against or being hurtful or offensive against, or bringing into contempt or ridicule, any other person on the ground of race, colour or ethnic or national origins.
Bullying	Workplace bullying is repeated, unreasonable behaviour by an individual or a group that creates a risk to health and safety. It can include, but is not limited to, behaviours such as: • Directing any form of aggressive or frightening behaviour towards a person or group of persons; • Shouting or swearing at someone; • Threatening to make, or actively making, someone's work or home life difficult; • Putting someone or a group of people down in a nasty way (often in front of others); • Baiting or teasing; • Placing abusive, belittling or intimidating phone calls, emails, notes and so on; • Deliberately changing work duties to victimise a particular employee/s; • Verbal abuse, including speaking in a belittling, demeaning or intimidating manner; • Sabotaging someone's work; and/or • Ridiculing someone's opinion, actions or choices. Bullying is not limited to the physical workplace. It can occur both face-to-face or by virtual means (commonly referred to as 'cyber bullying'). Bullying does not include expressing differences of opinion in an appropriate manner, standard personality conflicts or reasonable managerial actions, such as the raising of genuinely held concerns about an employee's conduct or performance.
Victimisation	Victimisation means subjecting or threatening to subject a person to some form of detriment because they have: • Lodged, or is proposing to lodge, a complaint of discrimination or harassment; • Provided information or documents to an internal investigation or an external agency; • Attended a conciliation conference; • Reasonably asserted their rights, or supported someone else's rights, under federal anti-discrimination laws; and/or Made an allegation that a person has acted unlawfully under federal antidiscrimination laws.
Vilification	Vilification is any public statement or act, which may cause, or is likely to cause hatred, contempt or ridicule. It does not necessarily have to be related to work. It is unlawful to vilify a person because of that person's race, colour, descent, nationality, ethnic origin, ethno-religious origin, national origin, homosexuality or transgender identity, or because the person is HIV positive or has AIDS. Certain acts that are unlawful harassment might at the same time be seen as unlawful vilification. It is important to understand that some acts of vilification are criminal offences.

6. Policy Governance Schedule

Approval date	22 August 2025
Next review	22 August 2027
Policy Owner	Group Chief People Officer People
Division	and Culture
Approved by	nib Group Board and the People and Remuneration Committee