



Sexual Harassment 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 Sexual Harassment Policy applies to all nib holdings limited Group employees, including Directors of the Board, officers, executives and leaders, except Honeysuckle Health Group who have a separate policy. It also applies to everyone connected to and working with nib, including consultants, contractors and associates.

2. Policy Statement

nib is committed to providing a safe, respectful and inclusive work environment where everyone is treated fairly and with dignity. Sexual harassment has no place in our workplace, and it represents behaviours that are below the standards we expect from our employees, and everyone connected to nib.

We have zero tolerance for any form of discrimination, harassment, sexual harassment, bullying, victimisation or vilification. We recognise our positive duty to take reasonable and proportionate measures to eliminate unlawful conduct. There will be action and consequences that are appropriate and proportionate to the behaviour and the impact of this behaviour.

2.1. Guiding principles

Our guiding principles to prevent sexual harassment in our workplace are:

- We will be proactive in providing a safe workplace and eradicating sexual harassment in all its forms and will provide safe and effective responses for those impacted;
- We will educate and support our employees and leaders on respectful workplace conduct, how to prevent, intervene early and respond to offensive behaviour;
- We will encourage a shared responsibility where everyone has a role to play in preventing and responding to sexual harassment to ensure the safety and wellbeing of others;
- We expect our employees to act in a professional manner which is respectful and inclusive when interacting with others and be aware of how their behaviour impacts others;
- We expect our employees that, if it is safe to do so, they will intervene or report any behaviour that may cause offence, distress or harm to others;
- We will not tolerate any form of sexual harassment from, or directed towards, our employees. We will ensure that all our employees feel safe and supported in our workplace;
- We will treat all allegations or complaints of sexual harassment seriously and ensure they are investigated and dealt with promptly;
- We will support any employee who has experienced sexual harassment in our workplace, and we will prioritise their safety and wellbeing, while involving them in the decision about how to handle the issue;
- We will raise awareness and education of behavioural change programs available for perpetrators of sexual harassment;
- We will maintain confidentiality and privacy of any employee who reports sexual harassment in our workplace as far as possible whilst ensuring our duty of care to all employees; and
- We will continue to consult with our employees regarding the identification and control of risks for sexual harassment to ensure we are providing a safe workplace.

2.2. 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, demeaned or intimidated.

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 on communication platforms.

It is important to note that sexual conduct that has been welcomed in the past can become unwelcome.

Sexual harassment is not:

- Behaviour based on mutual attraction, friendship, and respect; and/or
- Interactions that are consensual, welcome, and reciprocated.

2.3. How can sexual harassment occur

Sexual harassment can occur:

- At any time (including outside of work hours) in any situation where a person interacts with colleagues, contractors, customers and visitors;
- In our work locations, working from home and work-related events (e.g. conferences, parties, business development activities and social functions);
- In different forms including physically, verbally, in writing or through electronic communications (phone, email, text/instant messaging, and social media);
- Regardless of gender and can be by someone from the same or different gender;
- When there is no intent to cause offence;
- In a single act or as a series of acts; and
- Outside of work and in relation to relationships and interactions with colleagues.

2.4. Reporting concerns about sexual harassment

2.4.1 Internal reporting

Any person has the right to raise a concern, make a complaint and take action to report sexual harassment. 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 on how to raise a concern.

When a concern is raised or a complaint is made internally about sexual harassment, we will act promptly and work with the employee to address the matter. For instance, we will seek their preferences in how to deal with the matter, including the outcome they are seeking. We will consider ways to support the employee such as providing access to our Employee Assistance Program (EAP) or changing their work arrangements. Wherever possible we will keep the matter confidential and take steps to preserve the employee's anonymity if that is their preference.

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

2.4.2 External reporting

Where the person who has a concern or complaint does not feel comfortable, 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 sexual harassment.

A person may also choose to take a complaint of discrimination and/or harassment to the Police and/or 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.

3. Responsibilities

3.1. Employees

Employees are responsible for:

- Complying with this policy at all times and understanding their obligation to report any behaviour that breaches this Policy;
- Respecting the rights of other employees, consultants, contractors, associates, candidates, clients and customers to freedom from unlawful discrimination, harassment, bullying, victimisation and vilification;

- Not engaging in unwelcome behaviour or conduct of a sexual nature towards anyone in the workplace;
- Behaving professionally and treating others with dignity, courtesy, and respect whether at work, working from home or out of work settings;
- Completing assigned compliance training on how to prevent, intervene and report incidents of sexual harassment;
- Intervening, if they feel safe and comfortable, in any situation where they feel the behaviour may cause offence, distress or harm to others; and
- Protecting, supporting and not disadvantaging or unfairly treating a person for making or being involved in raising a concern or making a complaint.

3.2. Leaders

In addition to the above responsibilities, leaders are responsible for:

- Promoting and role modelling a workplace that is free from any form of sexual harassment;
- Ensuring that all employees have completed their assigned compliance training to know their rights and responsibilities in order to provide and experience a safe, respectful and inclusive work environment;
- Identifying, addressing and educating employees about behaviour that enables or condones sexual harassment;
- Encouraging employees to speak up and report any sexual harassment concerns they have;
- Providing opportunities for employees to resolve concerns in a fair, timely and confidential manner;
- Supporting any employee who is impacted by sexual harassment, and prioritising their care and support when responding to concerns or complaints related to of sexual harassment; and
- Creating an environment where employees feel safe to express any concerns without fear of retaliation, penalty or personally negative consequences.

3.3. People and Culture

People and Culture are responsible for:

- Providing monthly reporting to the MD/CEO and Board on the number and prevalence of formal and informal complaints, gender of complainant and accused, nature of sexual harassment incidents, outcomes of investigations, actions to prevent and respond to sexual harassment;
- Developing and maintaining sexual harassment prevention plans in accordance with legislative requirements;
- 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.

3.4. Board and Executive

Our Board and Executive are responsible for:

- Ensuring sexual harassment 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 sexual harassment incidents.
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4. Related documents

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

- Code of Conduct
 - Anti-Discrimination and Equal Opportunity Policy
 - Health, Safety and Wellbeing Statement
 - Whistleblower Policy
 - Grievance Resolution Policy and Procedure (internal)
 - Grievance Resolution Procedure (internal)
 - Performance Management & Discipline Policy and Procedure (internal)
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5. Monitoring and compliance

Sexual harassment is unlawful and prohibited under legislation. Some forms of sexual harassment such as sexual assault, rape and stalking may also constitute a criminal offence. In some cases, nib may be required to report the matter to the Police.

Any breaches of this policy will be reported to the Group Chief People Officer and managed in accordance with the company's Performance Management & Discipline procedures.

6. Policy Governance Schedule

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