



Human Rights Mitigation, Remediation and Reporting Guideline

1. Purpose

To define the process by which Contact mitigates and remediates human rights risks and reports annually on its approach to human rights issues.

2. Application

2.1 Mitigation

Contact has a wide range of measures in place to mitigate human rights risks across the business. For example, we:

- Maintain a **range of policies** which set out our approach to human rights and our expectations of employees, in alignment with our *Tikanga*, including Contact's Code of Conduct; Discrimination, Bullying and Harassment Prevention Policy, Inclusion and Diversity Policy; Health and Safety Policy; Environment Policy and Wellbeing Policy. We also publish an annual Modern Slavery Statement
- Include **human rights** and **labour rights** (including **modern slavery**) considerations in our **procurement process**. We raise the level of due diligence for higher-risk suppliers, based on Global Slavery Risk Index categorisations. Where suppliers do not meet the expected standard Contact works with them to address and resolve the relevant issue(s). Contact may also choose not to work with a supplier if its labour/modern slavery risks are high and/or it refuses to address existing risks.
- Set out our expectations for all suppliers regarding ethical, social and environmental business practices in Contact's **Supplier Code of Conduct**.
- Set targets, track and report annually on **Board diversity**; **employee diversity** (by gender, ethnic grouping and employment type); and **gender pay equity**.
- Take measures to increase **female representation** in senior and operational roles.
- Respect the rights and interests of **communities** by listening, and managing the environmental, economic and social impacts of our activities. We do this through a range of community engagement programmes.
- Take a partnership approach and manage whenua, awa and other taonga in the spirit of **Te Tiriti** to preserve and restore cultural heritage affected by generation assets and activities
- Assist **vulnerable customers** through our energy hardship programmes
- Provide a **Whistleblower hotline** for employees to report behaviour which contravenes our policies or Code of Conduct, as well as pathways for employees to report directly to appropriate **external channels** including the human rights Commission and WorkSafe.
- Deliver online and in-person **training** on human rights-related issues.

2.2 Remediation

Remediation in the event of a human rights breach will depend on the circumstances and may be determined by:

- a manager, the General Counsel or a Leadership Team member where the report is made to them;
- the designated group of three senior managers (the General Counsel; the Head of Risk and Business Assurance and the Head of Operations, People Experience) which receives reports made through the Whistleblower channel; or
- the Leadership team, where the issue is escalated to them.

This will be addressed in consultation with the affected person or people where they have supplied their details, or based on verified information where the report was made anonymously.

2.3 Reporting

Purpose:

- The purpose of reporting annually on our approach to human rights at Contact is to:
 - publicly explain how we meet our commitment to human rights
 - demonstrate that we are taking reasonable steps to address human rights risks
 - give stakeholders a means of evaluating our understanding of human rights issues, and show them how we put our policy into practice; and
 - show investors and employees that we are an investment/employer of choice.

Process:

- A designated group of three senior managers (the General Counsel; the Head of Risk and Business Assurance and the Head of Operations, People Experience) will receive human rights breach reports through the Whistleblower channel.
- This group will meet to review each report and determine any necessary remediation steps, as well as any further mitigation required based on longer-term trends.
- The People Experience team will prepare a human rights report for inclusion in/alongside Contact's Annual Integrated Report.

3. Compliance

Contact requires all employees and contractors to comply with this Guideline. Compliance with this Guideline will be periodically monitored by the General Counsel, Corporate Affairs.

4. Document control

Approved: March 2023

Document owner: Head of Operations, People Experience