



Group – Diversity, Equity & Inclusion Policy

PEXA Group Limited

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For internal and external use – Public Policy

Document control

Title: Group - Diversity & Inclusion Policy

Policy Owner: Group Chief People Officer

Functional Owner: General Manager, People & Culture AU / Head of People UK

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Contact for inquiries and proposed changes:

People Experience

Change History

Version	Date	Revised by	Brief outline of changes
1.0	June 2021	Board	Final version
1.1	October 2021	RCC/ARC	Scope revision
1.2	July 2022 Oct 2022	GRC GM, People Services	Update to Policy Owner Policy reviewed & with minor non-material updates; material change to governance from ARC to RNPC.
1.3	Nov 2023	GM People; GM People Services; Ashurst AU & UK	Annual Review
1.4	Nov 2024	Ashurst AU & UK; People Experience Leadership Team, Risk UK & AU	Annual Review

Approval History

Approval History Name	Version	Date	Approval Evidence
Board	1.0	Jun 2021	Minutes
Risk & Compliance Co/Board	1.1	Oct 2021	Minutes
Remuneration, Nominations & People Co/Board	1.2	17 Nov 2022	Minutes
Remuneration, Nominations & People Co/Board	1.3	23 Nov 2023	Minutes
RNPC/Board	1.4	Nov 2024	Meeting Minutes

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1. Purpose

PEXA Group Limited and each of its subsidiaries (**PEXA**) is committed to creating an inclusive environment for all our people and to anyone who visits or interacts with PEXA. PEXA aspires to have a diverse and inclusive workplace, and aims to develop a workplace diversity, equity and inclusion framework and embed workplace diversity, equity and inclusion within its systems and culture.

PEXA recognises workplace diversity, equity and inclusion as an integral part of how we operate. It is imperative to our success. Our commitment to all our people is to ensure equality and fairness, in particular ensuring that no employee experiences less favourable treatment or discrimination on the basis of gender, sex, race, colour, ethnicity, nationality, sexual orientation, gender identity, gender reassignment, age, disability (visible and non-visible), family status, marital or civil partner status, language, religion or belief, ethnic or national origin, perspective and experience. We are also committed to making reasonable adjustments as per the appropriate legislation of the jurisdictions we operate in (including the UK Equality Act 2010) where a disabled person may otherwise be placed at a substantial disadvantage in comparison to a non-disabled person.

This Diversity, Equity and Inclusion Policy (**Policy**) contributes to achieving PEXA's strategic objectives and embeds the importance and value of diversity at PEXA. It is important that PEXA is able to attract, retain and motivate employees from the widest possible pool of talent, and that PEXA is committed to building a workforce that reflects the diversity of our community, customers and employees, and helps us to create better experiences for them.

Our business policies, practices and behaviours promote workplace diversity and equal opportunity and create an inclusive and collaborative environment where individual differences are valued and all our people have the opportunity to realise their potential and contribute to PEXA's success.

2. Scope

This Policy applies to all directors, officers, employees, contractors, consultants, agency workers, volunteers, interns and service providers directly engaged by PEXA or any of its subsidiaries.

This Policy does not form part of any contract of employment or other contract to provide services, and PEXA may amend it from time to time.

3. Application

In order to meet our commitment to diversity, equity and inclusion, all staff working at PEXA's workplace must be aware of this Policy and ensure their behaviour is non-discriminatory. In addition, managers and supervisors are responsible for implementing this Policy within their teams and ensuring that any problems are dealt with promptly.

People Leaders have a responsibility as leaders to make decisions based on merit, to encourage diversity, equity and inclusion in their teams and to model appropriate behaviour to ensure a strong and diverse culture, which will significantly contribute to our commercial success.

Our commitment to diversity, equity and inclusion extends to everyone at PEXA, including staff (current, future and former), clients, customers and visitors. This Policy applies to all processes, practices and decisions relating but not limited to:

- recruitment, selection and retention;
- talent identification, succession planning and promotion processes;
- supervision, management and performance management;
- terms and conditions of employment (including pay, benefits and conditions);
- flexible working and leave;
- reasonable adjustments for employees with disabilities;
- disciplinary and grievance procedures;
- training, learning and development;
- goal setting; and
- termination of employment.

Successful recruitment and selection is a fundamental part of the business and candidate diversity allows for different strengths and contributions to be brought to PEXA. PEXA aims to recruit and appoint applicants objectively on the basis of their relevant merits and abilities. It is critical that decisions to hire, appoint or promote individuals are not made on a discriminatory basis. These same principles are applied when considering new Directors for appointment to the Board to ensure a balance of skills and background in candidate selection.

4. What is workplace diversity, equity and inclusion?

Fostering and promoting diversity, equity and inclusion will enable us to realise significant commercial benefits, including increased innovation, creativity and critical thinking. We believe that it will support us to bring our values to life and that creating an environment that values difference, diversity, equity and inclusion is beneficial to everyone.

At PEXA, workplace diversity, equity and inclusion means:

- an inclusive workplace that embraces individual differences;
- a workplace that is, as far as reasonably practicable, free from discriminatory behaviours and business practices including discrimination, harassment, bullying, victimisation and vilification;
- equitable remuneration frameworks and policies, processes and practices that limit potential bias;
- fair and effective processes for the appointment of our people that limit potential bias;
- awareness of different needs of employees;

- the provision of flexible work practices and policies to support employees; and
- attraction and retention of a diverse range of talented people.

5. Supporting policies

Our approach is underpinned by a diversity, equity and inclusion strategy which is endorsed by the Board and supported by a range of PEXA's other policies:

- **Code of Conduct and Ethics** – we are committed to complying with all applicable laws and regulations, and conducting our business with the highest standards of ethics and integrity.
- **Whistleblower** – we recognise the important role whistleblowing can play in the early detection of PEXA's exposure conduct that may be corrupt, illegal, immoral or unethical and we will support anyone who raises concerns in respect of such matters.
- **Workplace Behaviours** – we are committed to creating a respectful, courteous work environment free of unlawful discrimination, harassment, bullying and victimisation and we are committed to taking all reasonable steps to prevent and address it. Our aim is to provide a safe, respectful and fair working environment, attract and retain the best possible employees, and ensure that when employment decisions are made that they are based on merit.
- **Domestic Violence Support** – we recognise that employees face situations in their personal lives that may affect their performance or attendance at work. As such, PEXA is committed to supporting employees in relation to domestic and family violence. Information in relation to domestic violence arrangements is contained in the country-specific policies dealing with leave and employee assistance.
- **Flexible Work Arrangements** – we recognise the needs of employees to balance work and life commitments and will endeavour to ensure eligible people have access to flexible work options that work for them and the business. Information in relation to flexible work arrangements is contained in the country-specific policies dealing with leave and employee benefits.
- **Leave** – we recognise that our People have different needs and priorities at different stages of life and career. We offer a range of leave options depending on the statutory requirements of the relevant jurisdictions in which PEXA operates.
- **Learning & Development** – we recognise the importance of ongoing professional development of our employees and how essential it is to the success of the organisation. PEXA offers a wide range of learning opportunities through mentoring, inductions, in-house PEXA training, the PEXA Academy conferences, seminars, on-the job training, external training and online training through the Learning Management System.

6. Grievances

Any substantiated breach of this Policy will be dealt with seriously and may result in disciplinary action, up to and including termination of employment. PEXA is committed to taking appropriate action where a complaint is raised and an investigation may follow in line with PEXA's grievance procedures. For more information regarding raising a grievance, refer to PEXA's formal grievance procedures.

7. Responsibilities

The Board

The Board is responsible for oversight of the implementation of this Policy and monitoring its effectiveness.

The Board will measure the effectiveness of PEXA's policies and training and education programs established to assist PEXA to achieve diversity, equity and inclusion, including but not limited to gender diversity, and measure PEXA's progress in meeting these objectives through regular reporting and analysis.

The Board recognises that it must provide guidance to management on the promotion of diversity, equity and inclusion within PEXA.

The Remuneration, Nomination and People Committee

The Remuneration, Nomination and People Committee is responsible for reviewing this Policy, recommending policies to assist PEXA to achieve diversity, equity and inclusion and will provide the Board with an annual report on the status of workplace diversity, equity and inclusion within PEXA. This report will include details of the diversity, equity and inclusion initiatives across PEXA and relative proportions of men and women at all levels in the organisation.

The Remuneration, Nomination and People Committee will:

- make recommendations to the Board regarding the measurable objectives;
- annually assess the objectives set by the Board and regularly monitor the progress against them;
- review and monitor the effectiveness and publication of this Policy;
- annually review the proportion and remuneration of women who are employed by PEXA, including at the Senior Executive and Board level, and submit a report to the Board outlining its findings;
- benchmark PEXA's position and progress on diversity objectives and undertake gender pay equity audits to gain an insight into the effectiveness of this Policy; and
- oversee the implementation of initiatives outlined in PEXA's diversity, equity and inclusion strategy, including those arising from this Policy.

8. Related Documentation

- Group - Code of Conduct and Ethics Policy
- Group - Whistleblower Policy
- Group - Performance Policy
- Group - Workplace Behaviours Policy
- Country Leave Policies
- Country Family Policies
- Country Benefits Policies
- Country Grievance Procedure