

Seven Group Holdings – Diversity and Equal Employment Opportunity Policy

1. Purpose

Seven Group Holdings (SGH) is an inclusive organisation that embraces diversity in the workplace and is committed to ensuring that all SGH employees are provided a workplace of equal opportunity. This Policy sets out SGH's commitment to promote and uphold the SGH values which support to foster an inclusive culture and embrace diversity in all its forms.

Maintaining a workplace that provides equal opportunities and embraces diversity is the shared responsibility of all SGH employees.

Any conduct which is deemed to be in breach of this Policy may, in accordance with SGH's legal obligations, result in disciplinary action.

2. Scope

This Policy applies to employees when carrying out work duties or work-related activities both on site and off site. It extends to work-related and non-work-related electronic communications.

This Policy also applies to recruitment and selection, conditions and benefits, training and promotion, task allocation, hours of work, leave arrangements and workload, as well as interactions with other employees, clients, customers, suppliers and other third parties.

Diversity and Equal Employment Opportunity Policies within SGH subsidiary companies, operating divisions, business units and joint ventures managed by SGH are expected to be consistent with this Policy.

3. Policy Evaluation and Review

SGH's People & Culture team is the owner of this Policy and is responsible for implementation, interpretation, application, review and revisions. This policy will be periodically reviewed, every two years at a minimum, to ensure it is operating effectively and/or when legislation is changed. Revisions are subject to SGH Board approval.

4. Diversity and Equal Opportunity

The differences of individuals combine to create a diverse workplace. Differences such as gender identity, age, cultural background, religious beliefs, marital or family status, ethnicity, cultural background, physical abilities, socio-economic background, sexual orientation, perspectives and experience are viewed by SGH as important to achieving its goals. Diversity is to be valued and utilised in order to create a positive workplace for employees and in turn enable positive outcomes for SGH by being able to attract, retain and motivate employees from the widest possible pool of available talent in a competitive environment.

SGH is committed to ensuring equal opportunity for all employees at all levels of the organisation, where an individual's characteristics of diversity do not negatively impact decision making regarding employment opportunities. An inclusive workplace environment and commitment to gender diversity are essential elements of the commitment to equal opportunity.

5. Principles

- An effective implementation and assessment process will be in place to ensure that equal employment opportunity and diversity forms part of SGH work practices.
- SGH and its employees recognise the benefits of a workplace culture that accepts the experiences and perspectives of all employees, in order to foster an inclusive workplace culture.
- Employees are consulted on equal opportunity and diversity issues relevant to them.
- Employees are appropriately trained and understand the benefits of a diverse and inclusive culture including employee engagement, retention and satisfaction.
- The employment processes of recruitment, management and promotion are to be based on merit, competency and performance. This Policy is regularly monitored and revised to reflect developments in best practice, as well as regulatory and organisational changes.

6. Roles

This part outlines the duties of categories of persons in ensuring diversity, equal opportunity and the standards of behaviour outlined in this Policy are achieved.

Board

- Sets objectives and works to ensure that organisational behaviour is consistent with an inclusive workplace that embraces diversity.

Executive Team

- Set objectives and demonstrate behaviour consistent with an inclusive workplace that embraces diversity.
- Adhere to the minimum standards of behaviour outlined in this Policy.
- Report unacceptable behaviour and deal with any complaints made, appropriately and promptly.

Managers and Supervisors

- Demonstrate behaviour consistent with an inclusive workplace that embraces diversity and promote such a workplace by:
 - Encouraging the sharing of diverse experiences and perspectives.
 - Identifying and considering how particular diverse attributes can create value and assist employees to make such a contribution.
 - Fairly reviewing performance against objectives set at least once a year.
- Adhere to the standards of behaviour outlined in this Policy.
- Report unacceptable behaviour and deal with any complaints made, appropriately and promptly.

6.1 Employees

- Demonstrate a commitment to developing an inclusive workplace that embraces diversity by:
 - Respecting and accepting the unique experiences and characteristics of others.
 - Sharing personal experiences and perspectives.

- Demonstrating to colleagues that their contributions are valued.
- Ensure that standards of behaviour are met by:
 - Adhering to the standards outlined in this Policy.
 - Raising incidents or patterns of unacceptable workplace behaviour.
- Report unacceptable behaviour.

6.2 Inclusive Environment

An inclusive environment is one in which individual differences are accepted, respected and valued.

In working towards achieving an inclusive environment, the following initiatives are supported by SGH:

- Flexible Work Practices
 - Flexibility provides employees with a wider range of choices as to how, when and where they are able to undertake their work activities.
 - Development of flexible work practices, tailored to individual needs, to assist all employees to balance work with family, carer or other responsibilities.
 - These practices may be formal, such as part-time hours, or informal, such as working from home.
 - Staff on extended leave have the opportunity to maintain their connection with SGH by attending work functions, training and continuing to receive all staff communications.
- Career Development and Performance
 - Decisions regarding employment and remuneration are based on merit, ability, performance and potential.
 - SGH strives to make decisions in a transparent and fair manner that excludes conscious or unconscious biases that might discriminate against certain candidates. Internal placements are recruited through the assessment of individual merit, skills and experience.
- Talent and Succession Planning
 - Assisting all employees to achieve career development and progression.
 - Ensuring the talent of all employees is recognised and utilised to retain and increase diversity across all levels of SGH by designing and implementing programs that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare for senior management and board positions.
 - Decisions relating to task allocation, training and development are based on merit, performance and talent.

6.3 Equal Representation and Gender Equality

SGH is committed to equal representation of men and women across all levels and roles within the organisation.

In accordance with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations, the Remuneration & Nomination Committee, under

delegation from the Board, will set measurable objectives for achieving gender equality and, on an annual basis, assess both the objectives and SGH's progress in achieving them.

SGH will complete and submit an annual Workplace Gender Equality Agency Report and provide notifications required by the *Workplace Gender Equality Act 2012* (CTH).

Information about the measurable objectives can be found:

- On SGH's website, where SGH's Workplace Gender Equality Agency Report will be published;
- In SGH's Annual Report, which will include a summary of SGH's progress towards achieving the measurable objectives set under this Policy for the year to which the Annual Report relates; and
- In SGH's Annual Report, which will include details of the measurable objectives set under this Policy for the subsequent financial year.

6.4 Gender Representation Review

Each year the Remuneration & Nomination Committee will review the proportion of men and women on the Board, in senior executive positions and across the whole organisation and will outline its findings to the Board (including how "senior executive" has been defined for this purpose).

SGH will disclose in its Annual Report the information referred to above (that is, the proportion of men and women on the Board, in senior executive positions and across the whole organisation) and, if applicable, SGH's most recent Workplace Gender Equality Agency Report findings, which will include additional factors such as the "Gender Equality Indicators" as defined by the *Workplace Gender Equality Act 2012* (CTH).

7. Definitions

Electronic Communications:

- Work-related electronic communications such as email.
- Non-work related electronic communications including social media posts expressed through a blog, web page, social networking or similar site.

Employees: SGH's directors, officers, executive team, contractors, managers and all other employees.

SGH: Seven Group Holdings Limited.

Work-related activities: Includes but is not limited to work related functions, business trips, working away from the office and conferences.

Diversity: visible and invisible differences that exist between individuals such as race, ethnicity, gender, gender identity, sexual orientation, socio-economic status, age, marital status, family responsibility, physical abilities, religious beliefs, political beliefs, or other ideologies.

Inclusion: refers to having a culture where all people feel welcome and able to contribute regardless of their varying experiences, views and backgrounds and the practice of ensuring all individuals having access to equal opportunities (training, promotion, etc) within their employment without any barriers due to their non-competency or merit based differences.

Equal Employment Opportunity (EEO): refers to all individuals having equal access to employment and development opportunities based on merit, and without fear of discrimination and harassment.

8. Related Policies

This policy should be read in conjunction with:

- SGH Code of Conduct
- SGH Discrimination, Bullying and Harassment Policy
- SGH Workplace Health and Safety Policy
- SGH Grievance Resolution Policy and Procedures
- SGH Whistleblower Policy