



Diversity Policy

H&G High Conviction Limited
ACN 660 009 165
(Company)

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1 Scope and purpose of Policy

1.1 Company's commitment

The Company is committed to promoting diversity within the Company and recognises the value of diversity in achieving the Company's corporate objectives and maximising value to shareholders.

The Company considers that diversity within the Company will improve the quality of decision-making, productivity and teamwork amongst its Employees. The Company recognises that organisational performance is linked to workplace diversity. Through fostering an inclusive environment which recognises a variety of quality Employees, the Company aims to improve employee retention, to embrace different perspectives and to enhance the Company's reputation.

1.2 Application of Policy

This Policy applies to the Board and all senior management, Employees and contractors of the Company.

This Policy is to complement existing employment related policies and documentation. This Policy does not form part of an Employee's contract of employment with the Company or any of its related bodies corporate, nor does it give rise to contractual obligations. However, to the extent that this Policy requires an Employee to do or refrain from doing something, and at all times subject to legal obligations, this Policy forms a direction of the Company with which an Employee is expected to comply.

1.3 Purpose of Policy and objectives

The purpose of this Policy is to enable the Company to:

- (a) facilitate equal employment opportunities based on relative ability, performance or potential;
- (b) create an inclusive workplace culture that embraces diversity and that rewards people who act in accordance with this Policy;
- (c) achieve an awareness in all staff of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity; and
- (d) build a safe work environment by taking action against inappropriate workplace and business behaviour including discrimination, harassment, bullying, victimisation and vilification.

2 Definitions

General terms and abbreviations used in this Policy have the meanings set out below:

ASX means ASX Limited ACN 008 624 691 or the securities market operated by ASX Limited, as the case may be.

ASX Corporate Governance Council means the corporate governance council established by the ASX.

ASX Corporate Governance Principles means the *ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition, 2019)* as amended from time to time.

Board means the board of Directors of the Company.

Company means H&G High Conviction Limited ACN 660 009 165.

Director means a director of the Company.

Employee means executive Directors, managers and all other staff engaged or employed by the Company either on a contract of employment or a salaried basis.

Measurable Objectives means the measurable objectives which have been set to achieve gender diversity.

Policy means this 'Diversity Policy'.

Secretary means the company secretary of the Company.

3 Diversity framework

3.1 Board responsibilities

The Board is responsible for designing and overseeing the implementation of this Policy.

The Directors will be responsible for promoting diversity within the Company's culture and monitoring the effectiveness of this Policy.

The Company commits to the communication of this Policy within the Company and to its shareholders and the market, including via the corporate governance page on its website, so as to demonstrate transparency and accountability.

The Board is responsible for developing Measurable Objectives and reviewing annually both the Measurable Objectives and the Company's progress in achieving the Measurable Objectives as outlined further in paragraph **Error! Reference source not found..**

The Board will conduct all Board appointment processes in a manner that promotes diversity, including establishing a structured approach for identifying a diverse pool of candidates.

3.2 Strategies

The Company's diversity strategies may include:

- (a) recruiting from a diverse pool of candidates for all positions, including senior management and the Board, to guard against any conscious or unconscious biases that might discriminate against certain candidates;
- (b) reviewing succession plans to ensure an appropriate focus on diversity;
- (c) identifying specific factors to be taken into account in recruitment and selection processes to encourage diversity;
- (d) developing and achieving numerical targets for the proportion of women on the Board, in senior executive roles and in the workforce generally within a specified timeframe;
- (e) developing and achieving numerical targets for female representation in key operational roles within a specified timeframe with the view to developing a diverse pipeline of talent that can be considered for future succession to senior executive roles;
- (f) developing a culture in which discrimination, harassment, vilification and victimisation are not tolerated;
- (g) providing opportunities for Employees on extended parental leave to maintain their connection with the Company; and
- (h) any other strategies the Board develops from time to time.

3.3 Employees

All Employees are required to act in a manner that supports diversity within the workplace and promotes the objectives set out in this Policy. Employees are encouraged to provide feedback to management regarding programs or initiatives which will improve this Policy.

3.4 Non-inclusive or discriminatory behaviour

- (a) Direct discrimination is denying a person of an opportunity or treating them less favourably because they belong to a particular group or category.
 - (i) For example: not employing a female applicant on the grounds of males typically doing the job.
- (b) Indirect discrimination occurs when an action or policy which appears to treat everyone equally, has a discriminatory effect against a certain group of people.
 - (i) For example: holding workplace meetings after work hours when Employees with family responsibilities would find it hard to attend.
- (c) Harassment is any form of behaviour that is unwelcome and which offends, humiliates or intimidates a person.
- (d) Sexual harassment is any form of unwelcome sexual attention. This may be obvious or indirect, physical, or verbal, intentional or unintentional, or behaviour that creates a sexually hostile or intimidating environment.
- (e) Bullying is the repeated less favourable treatment of a person by another or others that may be considered unreasonable and inappropriate workplace behaviour. The behaviours can be physical, verbal or non-verbal.
 - (i) For example: assaulting, shouting or isolating a person in the workplace.
- (f) Victimisation is when an Employee is treated less favourably for making a complaint or providing information as a witness.
 - (i) For example: using pay back, refusing to acknowledge the person, removing or reducing benefits.
- (g) Vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule of another person or group of persons on the grounds of race, ethno-religious beliefs, HIV or AIDS, transgender or homosexuality.
 - (i) For example: graffiti that encourages hatred of a particular race of people.

Nothing in this Policy is to be taken, interpreted or construed so as to endorse:

- (a) the principal criteria for selection and promotion of people to work with the Company being other than their overall relative prospect of adding value to the Company and enhancing the probability of the Company achieving its objectives;
- (b) any discriminatory behaviour by or of the Company contrary to the law, or any applicable codes of conduct or behaviour for the Company and its personnel; or
- (c) any existing Employee of the Company in any way feeling threatened or prejudiced by this Policy in their career development or otherwise, merely because their diversity attributes at any time may have more, rather than less, in common with others.

4 Measurable Objectives

4.1 The Board

The Board will adopt Measurable Objectives and review the Company's progress in meeting these objectives and the effectiveness of these objectives each year.

The Board will review on the effectiveness of the Company's diversity objectives each year. This report will include a review of the relative proportions of men and women at all levels in the organisation.

4.2 Compliance

The Company intends to meet its obligations with respect to the issue of diversity, as may be required under the ASX Corporate Governance Principles and other regulatory requirements (if any), by:

- (a) establishing this Policy as a compliant policy in accordance with ASX Corporate Governance Principle 1.5 by:
 - (i) establishing Measurable Objectives; and
 - (ii) the Board assessing annually the Measurable Objectives and the Company's progress towards achieving them;
- (b) disclosing this Policy or a summary of it on the corporate governance page on the Company's website in accordance with ASX Corporate Governance Principle 1.5;
- (c) making disclosure in its annual report, and in accordance with ASX Corporate Governance Principle 1.5, regarding:
 - (i) the Measurable Objectives set by the Board for a particular period under this Policy;
 - (ii) the Company's progress towards achieving the Measurable Objectives in the relevant period;
 - (iii) the proportion in the Company and the Group (relative to their male counterparts) of:
 - (A) female Employees; and
 - (B) females in senior executive positions (for the purposes of this disclosure, being the CEO and all Employees directly reporting to the CEO);
 - (iv) either the Company's most recent Gender Equality Indicators, as that term is defined in the *Workplace Gender Equality Act 2012* (Cth) or the proportion of males and females on the Board; and
 - (v) if the Company was in the S&P/ASX 300 Index at the commencement of a reporting period, the Measurable Objective for achieving gender diversity in the composition of its board to have not less than 30% of its Directors of each gender within the previous reporting period; and
- (d) making disclosure in its annual report, and in accordance with ASX Corporate Governance Principle 2.2, of the mix of skills and diversity that the Board is looking to achieve in the composition of the Board.

4.3 **Responsibility for compliance**

The Secretary will assume the responsibility to ensure that the Company meets its compliance and reporting obligations referred to in paragraph 4.2 above, including by collecting and collating all relevant data and ensuring that management processes and systems are adequate and effective for such reporting obligations to be met.

5 Review

This Policy will be reviewed regularly by the Board and in any event at least once a year, having regard to the changing circumstances of the Company and any changes to the Policy will be communicated by the Company to its staff, its shareholders and the market.

Updates and amendments to this Policy will be the responsibility of the Secretary. All new management or other relevant staff will be provided with a copy of this Policy as part of their induction into the Company. Any updates or amendments as approved by the Board will be notified to appropriate officers and staff by the Secretary and corresponding updates and amendments will be made to this Policy and contained on the corporate governance page on the Company's website.

The Board may amend this Policy by resolution.

Adopted by the Board on 8 August 2022