# **Diversity Policy**

Pepper Money Limited (ACN 094 317 665)

Adopted by the Board on 6 May 2021

Updated on 30 May 2024

#### Pepper Money Limited Diversity Policy

### 1. Introduction

- (a) Pepper Money Limited (ACN 094 317 665) (the **Company**) acknowledges the positive outcomes and better overall performance that can be achieved through a diverse workplace, including the ability to attract, retain and motivate directors, officers and employees from the widest possible pool of available talent.
- (b) The Company recognises and utilises the contribution of diverse skills and talent from its directors, officers and employees. The Company also recognises that in order to have an inclusive workplace, discrimination, bullying, harassment, vilification and victimisation cannot and will not be tolerated.
- (c) For the purposes of this policy, diversity refers to the mix of people in the Company that is, the differences between people in how they identify in relation to their:
  - (i) social identity (i.e. gender, marital or family status, sexual orientation, gender identity, intersex status, age, disability status, caring responsibilities, ethnicity, religious affiliation, socio-economic or cultural background).
  - (ii) professional identity (i.e. profession, education, work experiences, organisational level, functional area, division/department, and location)

The above aspects come together in a unique way for each individual and shape their perceptions, as well as other's perceptions of them.

- (d) This policy applies to all officers, employees and all people who work at the Company, including contractors and consultants.
- (e) This policy will be reviewed at least annually by the Board of the Company (**Board**) to ensure that it is operating effectively and whether any changes are required.

## 2. Commitment of the Company

The Company is committed to:

- (a) ensuring that the Company's corporate culture and values at all levels supports diversity, equity and inclusion in the workplace whilst maintaining a commitment to a highperformance culture;
- (b) ensuring that recruitment and selection practices at all levels are appropriately structured so that a diverse range of candidates are considered and guarded against any conscious or unconscious biases that might discriminate against certain candidates;
- (c) designing and implementing programs and processes that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare them for senior management and Board positions;
- (d) monitoring the Company's Gender Pay Gap and ensuring action is taken to narrow any identified gaps
- (e) supporting at all levels an individual's domestic responsibilities (including the adoption of flexible work practices that will assist them to meet those responsibilities);
- (f) providing opportunities for employees on extended parental leave to maintain their connection with the workplace;

- (g) ensuring the policy for selection and appointment of new directors is transparent and considers all facets of diversity to avoid "groupthink" or other cognitive biases in decision making;
- (h) ensuring development and succession plans for directors and Senior Management include gender diversity as a relevant consideration;
- (i) monitoring and measuring the achievement of all diversity objectives set by the Board; and
- (j) considering whether key performance indicators for senior management might be an appropriate way of furthering gender diversity objectives.

### 3. Responsibilities

- 3.1 The Board has formally adopted this policy, reflecting a commitment by the Board for accountability across the Company to achieve its diversity goals.
- 3.2 The Board has responsibility for this policy, including its regular review and the monitoring of its effectiveness.
- 3.3 The Board has responsibility to:
  - (a) annually set measurable objectives for achieving gender diversity in the composition of its Board, senior management and workforce generally (**Objectives**) and, where appropriate, other aspects of diversity including in respect of women in leadership, age diversity and cultural diversity. If the Company enters the S&P/ASX 300 Index at the commencement of a reporting period, the measurable objective for achieving gender diversity in the composition of the Board will be to have not less than 2 female directors within a specified period;
  - (b) assess annually the Company's progress in achieving the Objectives; and
  - (c) disclose:
    - (i) the Diversity Policy on the Company's website;
    - (ii) the Objectives set for the relevant reporting period and the Company's progress in achieving the Objectives in the Company's annual report; and
    - (iii) the respective proportions of men and women on the Board, in senior executive positions and across the whole workforce (including how the entity has defined "senior executive" for these purposes) or the entity's Gender Equality Indicators, as defined in the Workplace Gender Equality Act 2012 (Cth).
- 3.4 The Company has a responsibility to report on (if or when required by law):
  - (a) workforce data on:
    - employee age (year of birth)
    - primary workplace location
    - CEO and casual manager remuneration
  - (b) sex-based harassment, harassment on the grounds of sex or discrimination
- 3.5 The Company has a responsibility to provide (if or when required by law) the Workplace Gender Equality Agency (WGEA) executive summary report and industry benchmark

report to the Board.

- 3.6 If the Company undertakes a gender pay equity audit, the Board will be advised and consider the results of any such audit and any disclosure related issues.
- 3.7 The Board will be responsible for approving any key performance indicators for senior management in relation to any of the Company's diversity objectives.