



Procedure Title:	Diversity and Inclusion Policy		
Document Number:	HR-PO-42	Revision:	Second Edition
Issue Date:	June 2015		
Custodian:	Board of Directors		

1. Policy

The Board of Pepper Group Limited (together with its related bodies corporate, **Pepper or the Company**) is committed to the diversity and inclusion of its people and recognises the value of attracting and retaining employees with different ideas, abilities and backgrounds to assist in achieving the Company's Core Competencies.

The Company's policies and practices promote equal opportunity and demonstrate a commitment to providing an environment that values diversity with a conscious desire to achieve understanding, respect, inclusion and continuous learning.

This diversity policy applies to all employees, prospective employees and contractors of Pepper, and to all aspects of the employment relationship. It also applies to the directors of Pepper.

2. Definition

Diversity is a collection of individual attributes that include characteristics such as gender, cultural background, religion, sexual orientation, disability and age as well as perspective, thought, education and experience. It embodies all the ways in which people differ and all the characteristics that make one individual or group different from another.

Inclusion is about creating an environment where diverse individuals have a sense of belonging, respect and support, and feel connected with others.

At Pepper, diversity and inclusion relates to:

- Equal employment opportunities based on merit
- A workplace that embraces and capitalises on individual differences
- A workplace that is free from discriminatory behaviours and practices
- A people framework that promotes equity and fairness, and limits negative perceptions
- The provision of flexible work arrangements to support employees

3. Related Legislation

- Fair Work Act 2009
- Racial Discrimination Act 1975
- Sex Discrimination Act 1984
- Workplace Gender Equality Act 2012
- Disability Discrimination Act 1992



4. Related Documents

- Recruitment and Selection Policy
- EEO, Anti-Discrimination, Harassment & Bullying Policy
- Code of Conduct
- Grievance and Appeals Policy

5. Responsibilities

Board

- Approve this policy and the Gender Diversity Plan, including setting measurable objectives each year which address the representation of women in senior roles within the business and on the Board, to actively facilitate a more diverse and representative management and leadership structure.
- Review the measurable objectives set under the Gender Diversity Plan, as well as the Company's progress towards achieving them each year.
- Review the respective proportions of men and women who are employed by the Company as a whole, in senior executive positions and on the Board.

Executive Team

- Role model inclusive behaviours.
- Promote a flexible working environment that meets the needs of both employees and the Company.
- Compliance with diversity reporting requirements.
- Create a culture that is equitable and where everyone is treated fairly and with respect. This includes championing diversity and inclusion in all people related practices, respecting differences, living Pepper's values and developing and/or supporting others fairly.

6. Procedures

6.1 Recruitment, Selection and Promotion

Pepper is committed to ensuring equal opportunity exists in all practices associated with the recruitment, selection and promotion of individuals, in particular, the recognition of individuals with different backgrounds, skills and knowledge. Additionally, practices are based on the individual's demonstration of ability, experience and values against key selection criteria without regard to gender, race, disability, transgender status, political opinion, religion, age, pregnancy, sexual preference, marital status or other prohibited criteria.

6.2 Talent Management and Performance

Pepper is committed to supporting and encouraging the personal and professional development of all employees; ensuring that access to development and training is free of any direct or indirect discriminatory practices. The Company provides tools and processes to allow employees to continuously review and develop their capabilities and participate in career growth discussions with their Manager. To



ensure bias is removed from performance review practices, performance is measured on the achievement of agreed objectives.

6.3 Pay Equity Audits

Pepper undertakes gender pay equity audits annually in order to gain an insight into the effectiveness of its diversity policies.

6.4 Flexibility

Pepper recognises the importance of supporting the flexibility needs of employees. Therefore, the Company offers a range of flexible working arrangements so that employees can balance their work and personal commitments and, in turn, increase employee engagement, retention and maximise the talent pool.

7. Complaints Procedure

The Company will treat all complaints relating to a breach of this policy seriously and will investigate them promptly and confidentially, in accordance with set procedures. In some circumstances, it may be appropriate to engage an independent person to investigate the complaint. Any proven incidents will result in disciplinary action, up to and including dismissal.

Pepper recognises the rights of the person accused of workplace harassment, discrimination or bullying to be treated with natural justice. This includes the right to know full details of allegations against them, a right of reply to those allegations, a presumption of innocence until evidence against them shows otherwise and the benefit of any reasonable doubt.

Any employee lodging a complaint under this policy should follow the Company's Grievance & Appeals Policy.

8. Disclosure

The following details will be included in the Company's Annual Report:

- the respective proportions of men and women who are employed by the Company as a whole, in senior executive positions and on the Board or, if applicable, the Company's most recent "Gender Equality Indicators" as defined by the *Workplace Gender Equality Act 2012*;
- a summary of the Company's progress towards achieving the measurable objectives set under the Gender Diversity Plan and approved by the Board pursuant to this policy for the year to which the Annual Report relates; and
- details of the measurable objectives set under the Gender Diversity Plan and approved by the Board pursuant to this policy for the subsequent financial year.