



Diversity & Inclusion Policy

Gale Pacific Limited

ACN 082 263 778

(the Company)

Adopted by the Board on 18 August 2016

Diversity & Inclusion Policy

Gale Pacific Limited and its subsidiaries (the Company)

1. Scope

Gale Pacific recognises that a diverse workforce is integral to its commercial success and is committed toward developing an inclusive and collaborative workplace culture.

Workplace diversity refers to a range of differences that exist between employees and the acceptance and respect of them. These differences can include gender, ethnicity, physical abilities, sexual orientation, age, language, religion, nationality, education, life experience, job function, work experience, personality, family status and carer responsibilities.

2. Diversity Policy Statement

Gale Pacific believes that a commitment to diversity is a business imperative as it creates value for our customers and shareholders, increases employee engagement, promotes innovation and ensures the organisation's sustainability.

We are proud of our diverse workforce and are committed to providing a workplace environment that fosters diversity through attracting, recruiting, engaging and retaining diverse talent, succession planning, Board appointments, flexible work arrangements and aligning the Company's culture with this commitment.

3. Diversity Strategy

The Company is committed to embracing diversity with the support of the following underlying initiatives:

3.1 Executive Leadership

The executive leadership team under the guidance of the Group Managing Director, will:

- a) perform a governance role to facilitate diversity management and champion an environment of mutual respect, dignity and openness to others;
- b) identify current and emerging opportunities to advance the diversity agenda & implement diversity initiatives across all areas of the business. This may entail the development of measurable objectives and report the achievement of these to the Board.

3.2 Equal Employment and Anti-Harassment

The Company's Code of Conduct and Business Ethics supports the Company's commitment of eliminating bullying, harassment and providing a workplace where employees can work without fear and inappropriate work conduct. It promotes the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements;

3.3 Appointment and Advancement

The hiring manager will consider diversity in relation to expectations of the relevant role, and adopt a fair merit based selection process focused on ability, performance and potential to ensure that there is no intended or unintended discrimination. This will entail:

- a) recruiting from a diverse pool of qualified candidates, and make efforts to identify prospective employees who have diversity attributes
- b) ensuring diversity of members on the selection panel appointing new employees (including senior management) and new Board members;

3.4 Remuneration

Managers will endeavour to ensure that there is no intended or unintended discrimination towards any particular diversity group or individual within a diversity group in relation to the remuneration or reward that an employee receives.

The Board, through its Remuneration and Nomination Committee, will review remuneration and incentives programs from time to time to ensure that there are no systemic biases.

3.5 Flexible work arrangements

The Company will endeavour to provide flexible working arrangements for employees to accommodate their individual circumstances while balancing the Company's business requirements.

3.6 Equal Employment and Anti-Harassment

The Company's Code of Conduct and Business Ethics supports the Company's commitment of eliminating bullying, harassment and discrimination. It supports the Company's commitment towards providing a workplace where employees can work without fear of unacceptable and inappropriate work conduct. It promotes the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements.

3.7 Compliance Requirements

The Company is committed to meeting its obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (3rd Edition) (**ASX Recommendations**) and any other applicable regulatory requirements, including by:

- a) establishing this policy (pursuant to ASX Recommendation 1.5(a));
- b) establishing measurable objectives for achieving gender diversity (pursuant to ASX Recommendation 1.5(a)); and
- c) the Board annually assessing the measurable objectives and the Company's progress in achieving them (pursuant to ASX Recommendation 1.5(a)).

The Company Secretary is responsible for ensuring that the Company meets its compliance referred to above.

3.8 Responsibilities

The Board is ultimately accountable for this policy.

The Chairman and Group Managing Director and members of the leadership team are responsible for the implementation of this policy and monitoring compliance with it, with the Company Secretary being responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant Board committee as appropriate).

4. Other matters

4.1 Overriding principles

Nothing in this policy will be taken, interpreted or construed so as to endorse:

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

4.2 Adoption of Policy and Board review

This Policy was adopted by the Board on **18 August 2016**, and takes effect from that date and replaces any previous policy in this regard.

The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

Amendments to this Policy

- 4.3** The Company may discontinue or amend any part or the whole of this policy from time to time at its absolute discretion. This Policy can only be amended with the approval of the Board.