



# **DIVERSITY POLICY**

**Trajan Group Holdings Limited**

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## 1 INTRODUCTION

### 1.1 Overview

Trajan Group Holdings Limited ACN 152 617 706 (**Company**) and its subsidiaries (**Group**) is an organisation that acknowledges the positive outcomes and better overall performance that can flow from embracing diversity and recruiting directors, officers and employees (**Personnel**) with diverse backgrounds, skills and worldviews. The Group recognises that fostering a diverse workforce is likely to:

- 1.1.1 assist in attracting and retaining first-class Personnel;
- 1.1.2 promote innovation throughout the Group; and
- 1.1.3 maintain a positive reputation for the Group.

The Group recognises that diversity extends beyond gender and includes, but is not limited to, differences that relate to ethnicity, age, physical and mental disability, marital or family status, socio-economic, religious or cultural background, sexual orientation and gender identity.

### 1.2 Application

This Diversity Policy (**Policy**) applies to the board of directors of the Company (**Board**) as a whole and all Personnel individually. This Policy does not form part of any Personnel's contract of employment or other agreement with the Group.

The Group, Board and Personnel must not rely on this Policy to defend conduct that does not comply with any applicable anti-discrimination law.

### 1.3 Policy objectives

The Board has adopted this Policy to:

- 1.3.1 recognise that diversity and inclusivity contribute to the overall success of the Group;
- 1.3.2 promote an organisation-wide culture that upholds diversity, inclusivity and equality;
- 1.3.3 ensure the Group fosters a safe, fair and respectful working environment for all Personnel; and
- 1.3.4 ensure the Group provides and maintains equal employment opportunities for all Personnel and candidates for Board appointment or employment with the Group.

## 2 DIVERSITY PRINCIPLES

### 2.1 Group commitments

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The Group is committed to maintaining a culture that embraces inclusivity, diversity and equal opportunity. As part of this commitment, the Group will not tolerate discrimination, bullying, harassment, vilification and victimisation in any form from any Personnel.

Without limiting the Group's general commitment to diversity, the Group will endeavour to ensure that the Group:

- 2.1.1 supports inclusion at all levels, while maintaining a commitment to high performance;
- 2.1.2 maintains structured and transparent recruitment, selection and advancement procedures, to ensure that a diverse range of candidates are considered for all roles;
- 2.1.3 does not allow potentially discriminatory conscious or unconscious bias to impact the Group's recruitment, selection and advancement decisions;
- 2.1.4 implements appropriate training, programs and procedures that will assist in the development of a broad pool of skilled and experienced Personnel; and

where appropriate, adopts flexible work practices to accommodate Personnel with diverse needs, including family responsibilities.

## 2.2 Board Responsibilities

The Board is responsible for leading the promotion of diversity and inclusivity throughout the Group and implementing, managing and reviewing this Policy.

The Board will, at the appropriate time and subject to the Group's size and operations, endeavour to, on an annual basis, establish appropriate and measurable diversity targets (**Measurable Objectives**) to achieve and maintain gender diversity in the Group. At least annually, the Board will evaluate the Measurable Objectives and the Group's progress in realising them.

## 2.3 Personnel Responsibilities

All Personnel are individually responsible for supporting the Group's commitment to diversity and inclusivity and must act in accordance with the Policy objectives and Group commitments set out in this Policy. Without limiting this responsibility, Personnel must not engage in any form of discrimination, bullying, harassment, vilification and victimisation against other Personnel, shareholders, customers, clients, suppliers or competitors of the Group.

All Personnel are required to report violations or suspected violations of this Policy. Personnel (other than directors) should promptly report such matters to their manager or the Human Resources Department. Directors must promptly report such matters to the Board.

## 2.4 Diversity Reporting

The Company will disclose:

- 2.4.1 this Policy, on the Company's website;

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2.4.2 any Measurable Objectives and the Group’s progress towards achieving them, in the Company’s annual report; and

2.4.3 the respective proportions of men and women on the board, in senior executive positions and across the whole Group (including how the Company has defined “senior executive” for these purposes), in the Company’s annual report.

### **3 ADOPTION AND REVIEW OF DIVERSITY POLICY**

#### **3.1 Adoption of this Policy**

The Board adopted this Policy on 23 March 2021. It takes effect from that date and replaces any previous policy in this regard.

#### **3.2 Review of this Policy**

This Policy can only be amended with the approval of the Board. The Board will review this Policy at least annually to ensure its effectiveness and will communicate any amendments to Personnel as appropriate.

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