# Diversity and Inclusion Policy

## December 2020

<table>
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<td><strong>Approver:</strong></td>
<td>Board</td>
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<td>Diversity and Inclusion Manager</td>
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1. What is this policy?

At Link Group, we recognise and respect the importance of diversity and inclusion as an integral part of how we operate. As a global organisation we:

- Are committed to creating an inclusive and collaborative environment where difference is valued and each person can realise their potential and contribute to Link Group’s success.
- Recognise that embracing and supporting individual differences and gender equality brings the breadth of perspective and depth of experience critical to our success.
- Strive to be an organisation where our people are reflective of the make-up of the companies we serve as well as their customers throughout the world.

2. Why do we need this policy?

The Diversity and Inclusion Policy (Policy) aims through its implementation to ensure Link Group is:

- Sustaining an environment that treats people fairly and equitably (Equity)
- Attracting and retaining diverse talent by offering an inclusive and flexible workplace (Diversity and Inclusion)
- Facilitating teamwork and collaboration, looking to form high performing diverse teams
- Leveraging our global footprint and skills to enhance the client experience and organisational growth.

We also work to ensure diversity and inclusion is integrated across all areas of our business practices, policies and behaviours.

The following guiding principles, which promote awareness and a proactive approach to driving a gender balanced workforce of diverse backgrounds and experiences, are applied across the Link Group:

- We expect everyone to demonstrate appropriate workplace behaviours, ensuring the safety and wellbeing of all employees. We do not tolerate unlawful discrimination, harassment, bullying, vilification or victimisation.
- We promote collaboration and teamwork and expect all employees to be respectful in their interactions and communications with each other, our clients, suppliers and the broader community – acting with honesty and integrity.
- Our leader’s role model and reinforce inclusive behaviours ensuring that all people management practices and decisions are based on fairness and merit and focused on driving gender equity and a diverse workforce. This includes recruitment, retention, performance management, promotion, talent identification and succession planning, recognition, remuneration and reward.
- We look to ensure a high level of engagement and performance, offering all employees the opportunity to have equitable access to learn, develop and grow their careers.
- We recognise the importance of supporting a blended working environment and practices that can accommodate the needs of our people at all career and life stages, looking to sustain high performance and retention.
This Policy reflects our commitment to recruit on the basis of role requirements. We select people based on their skills, experiences and suitability for the role, and do not discriminate on the basis of diverse characteristics including, but not limited to gender, sexual orientation, age, cultural/ethnic background and any other attributes outlined in the ‘definition’ section of this Policy.

Link Group strives to be a diverse and equal opportunity employer. We are committed to respecting human rights and to conduct our business in a manner that respects the rights and dignity of all people in the communities we operate in globally.

3. Who does the policy apply to?

This Policy covers Link Administration Holdings Limited and each of its subsidiaries (Link Group) and all Link Group employees (Employees) globally including Link Group’s Board of Directors (Board) and including but not limited to permanent, casual, fixed term employees and temporary workers.

This Policy does not form part of your contract of employment. It is for guidance only and Link Group may remove, replace or vary this Policy as appropriate, in response to business requirements.

4. How to comply with this policy?

At every level, our people have accountability for ensuring the successful promotion of all aspects of diversity and inclusion and appropriate behaviour in the workplace and for adhering to the principles outlined in this Policy. Any substantiated breach of Link Group’s Diversity and Inclusion Policy will be dealt with seriously and may result in disciplinary action.

5. How will policy compliance be monitored?

A governance structure is in place that outlines senior level responsibilities through a number of committees involved in setting, implementing and overseeing the progress of our Diversity and Inclusion strategy.

Board Responsibilities

The Board, with the assistance of the Human Resources and Remuneration Committee is responsible for approving and overseeing the implementation of this Policy and monitoring its effectiveness. This includes the adoption of measurable objectives to assist Link Group to achieve diversity and inclusion, including but not limited to achieving gender diversity, and the review of Link Group’s progress in meeting these objectives and the effectiveness of these objectives each year.

The Board recognises that it must also provide guidance to management on the promotion of diversity and inclusion within Link Group.

Human Resources and Remuneration Committee’s Responsibilities

The Human Resources and Remuneration Committee (HRRC) is appointed by the Board to assist the Board in overseeing major people and remuneration practices of Link Group. The HRRC’s scope of responsibilities includes recommending measurable objectives to the Board to achieve diversity and inclusion, and providing the Board with an annual report on the status of workplace diversity and inclusion within Link Group and the effectiveness of the measurable objectives including for achieving gender diversity.
The HRRC is also responsible for recommending to the Board the disclosures and reporting to be undertaken in accordance with the ASX Corporate Governance Councils’ Principles and Recommendations and will also have due regard to commitments made to all relevant statutory requirements in Australia and in jurisdictions where Link Group operates.

Diversity and Inclusion Committee

The Diversity and Inclusion Committee, chaired by the Managing Director, comprised of the Executive Leadership Team (ELT) of Link Group, and supported by the Diversity & Inclusion Manager and is responsible for:

- Setting, communicating and monitoring the execution of the Strategy
- Overseeing adherence to this Policy and ensuring compliance with applicable laws
- Monitoring the impact of the Strategy and reporting the progress towards achieving its objectives internally and externally including updates to the Board via the HRRC
- Leading the implementation and integration of key link policies (such as recruitment, talent management) that promote the achievement of a diverse and inclusive workforce, and
- Serving as visible diversity and inclusion role models, advocates and representatives for Link Group.

To support leadership accountability, key performance indicators (KPIs) have been put in place with the ELT, to drive focus and ensure progress in achieving gender diversity. A variety of measures will be used to track and report diversity and inclusion progress.

6. Are there any interrelated policies?

This Policy should be read in conjunction with other Link Group policies and guidelines that define and support our commitment to expected behaviours and conduct of all people. These include:

- Code of Conduct and Ethics Policy
- Discrimination/ Equal Employment Opportunity (EEO) policies as they apply in the countries in which we operate
- Flexible Working Policy
- Modern Slavery and Human Rights Policy
- Performance Management Policy
- Remuneration Policy
- Recruitment Policy
- Sustainability Policy
- Talent Management and Succession Planning Policy
- Whistle Blower Policy
- Work, Health & Safety Policy.
7. Definitions

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<th>Term</th>
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<tr>
<td>Diversity</td>
<td>Means accepting each person as an individual irrespective of differences used to differentiate groups and people from one another. Differences may be visible or invisible. Differences may include but are not limited to gender, gender identity, age, ethnicity, cultural background, socio-economic background, sexual orientation, intersex status, marital or family status, carer responsibilities, pregnancy, breastfeeding, physical abilities/disabilities, mental health, neurodiversity, religious or political belief and flexible working arrangements.</td>
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<td>Inclusion</td>
<td>Inclusion refers to supporting all individuals across the course of their career, irrespective of their diverse backgrounds, to bring their whole selves to work. Embracing workplace inclusion and diversity involves developing people management strategies that accommodate differences in the background, perspectives and family responsibilities of employees.</td>
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<td>Equity</td>
<td>Equity is about ensuring that every individual has an equal opportunity to progress their careers and make the most of their talents taking into account their aspirations and individual circumstances.</td>
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<td>Link Group</td>
<td>Link Administration Holdings Limited and each of its controlled entities.</td>
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<td>Employees</td>
<td>Any permanent employee, temporary worker and contractor, full time and part time of the Link Group.</td>
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<td>ELT</td>
<td>Executive Leadership Team comprising the Managing Director and direct reports to the Managing Director.</td>
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