

# Diversity Policy

NetLinkz Limited ACN 141 509 426

## 1. Introduction

This policy supports the commitment of NetLinkz Limited ACN 141 509 426 (**Company** and, together with its controlled entities, the **Group**) to an inclusive workplace that embraces and values diversity while always upholding the principle of meritocracy.

The Group acknowledges, in particular, the benefits of the recommendations and guidance provided in the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations* that relate to diversity, however, it is also cognisant of the fact that the Group is in its development phase and its workforce is not of a size where the benefits of such initiatives, are proportionate to the costs involved in the formal implementation of such strategies.

To this end, the Group has adopted a tiered approach to the implementation of its Diversity Policy which is relative to the size of the Group and its workforce.

Where the Group employs 100 or more employees, the Board of the Company undertakes to adopt practices in line with the recommendations and guidance provided in the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations*.

Whilst the Group's workforce remains below this threshold, the Board of the Company will continue to drive the Group's diversity strategies on an informal basis, and will apply the initiatives contained in this Diversity Policy to the extent that the Board considers them to be necessary, practical and achievable in the context of the Group's needs and available resources.

## 2. Purpose of this policy

The purpose of this policy is to:

- (a) outline the Company's commitment to creating a corporate culture that embraces diversity and, in particular, focuses on the composition of its Board and senior management; and
- (b) provide a framework for the achievement of Company's formal and informal diversity objectives.

## 3. Benefits of diversity

- 3.1 Diversity refers to the variety of differences between people in an organisation. Diversity encompasses gender, race, ethnicity, disability, age, sexual orientation, gender identity, marital or family status, religious or cultural background and more.
- 3.2 The Group's commitment to diversity at all levels forms part of its merit-based organisational culture dedicated to the recruitment and retention of the best available talent at all levels, up to and including the board of directors of the Company (**Board**).
- 3.3 The Group believes that embracing diversity in its workforce contributes to the achievement of its corporate objectives (including optimal financial performance in a competitive labour market) and enhances its reputation. It enables the Group to recruit and retain the right people from a diverse pool of talented candidates, which in turn enables the Group to:
  - (a) make more informed and innovative decisions, drawing on the wide range of ideas, experiences, approaches and perspectives that employees from diverse backgrounds, with differing skill sets, bring to their roles;
  - (b) identify and rectify gaps in the skills and experience of employees;

- (c) enhance employee retention;
- (d) innovate and maximise the available talent to achieve corporate goals; and
- (e) better represent the diversity of its stakeholders and markets.

## 4. Commitment to diversity

4.1 The Group is committed to:

- (a) promoting diversity among employees, consultants and senior management throughout the Company;
- (b) to the extent practicable, and where the Group employs 100 or more people, addressing and complying with the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations* (as amended from time to time) (**ASX Recommendations**) by establishing measurable objectives for achieving gender diversity; and
- (c) keeping shareholders informed of the Company progress towards implementing and achieving its diversity objectives.

## 5. Corporate culture

5.1 The Company aims to create a corporate culture that:

- (a) provides access to equal opportunities at all levels of work based on merit;
- (b) embraces and values diversity and seeks to encourage and facilitate opportunities for the employment of people from different backgrounds;
- (c) provides skills and career development initiatives; and
- (d) increases workforce participation and creates an inclusive environment where all employees feel included and valued.

5.2 The Group is an equal opportunity employer and welcomes people from a diverse set of backgrounds.

5.3 In order to have a properly-functioning diverse workplace, discrimination, harassment, vilification and victimisation will not be tolerated within the Group.

## 6. Board composition and skills matrix

While skills such as leadership and previous experience as a chief executive, chair or board member of a large organisation have traditionally been prerequisites to appointment as a director, the board recognises that other skills gained from experience in the following areas are key skills and experience that the Board as a whole should comprise:

- (a) understanding of the industry in which the Group operates;
- (b) public listed company experience;
- (c) stakeholder management skills;
- (d) business acquisition and integration skills;
- (e) financial literacy and legal and regulatory knowledge;
- (f) diversity;
- (g) knowledge of the information technology industry including risks and opportunities associated with that industry;
- (h) understanding of the regulatory environment in which the Group operates;
- (i) health, safety and environment and social responsibility; and

- (j) organisational development and human resources.

## 7. Recruitment of senior management and employees

- 7.1 The Group is committed to ensuring equal employment opportunity for all of its employees and senior management, based on merit, ability, performance and potential, in a way that contributes to the achievement of its corporate objectives, including diversity.
- 7.2 The Board will monitor and promote the diversity of staff and the associated corporate culture, including by ensuring that recruitment and selection processes at all levels are appropriately structured so that a diverse range of candidates are considered and will seek to put in place processes to seek to ensure that there are no biases that might discriminate against certain candidates.
- 7.3 The Company recognises that all employees may have domestic responsibilities and, where appropriate, aims to promote and create an environment which is conducive to all employees' domestic responsibilities.

## 8. Diversity Commitments

- 8.1 The Company will implement the following diversity commitments:
  - (a) the Board will review and determine, as frequently as required, a diversity agenda that meets the particular needs of the Company, including identifying the skill, experience and expertise requirements set for the Board and senior management necessary to effectively oversee its business and achieve its corporate goals (**Diversity Agenda**);
  - (b) the Board will seek to ensure that the Diversity Agenda is taken into account in the selection and appointment of qualified employees, management and Board candidates and will consider options in order to expand the range of qualified candidates to select from; and
  - (c) the Board will seek to identify and consider initiatives that:
    - (i) assist in the development of a range of skilled and experienced Board candidates, in particular women, such as practices relating to career advancement and skills development which prepare employees for management or Board positions;
    - (ii) assist with enhancing employee retention; and
    - (iii) assist with minimising career disruption when employees take time out of the workplace to meet other obligations and/or attempt to re-enter the workforce,
- (**Diversity Commitments**).
- 8.2 While the focus of the ASX Recommendations is on promoting the role of women within organisations, the Company recognises that other forms of diversity are important and seeks to promote a range of diversity initiatives throughout the Company beyond gender diversity.
- 8.3 The Board seeks to ensure that appropriate measures are introduced and responsibilities are delegated, where appropriate, to ensure that the Company's Diversity Commitments are implemented appropriately.

## 9. Objectives for achieving gender diversity

- 9.1 Where the Group employees 100 or more people, the Board will:
  - (a) set measurable objectives for achieving diversity, specifically including gender diversity, in accordance with this policy and the Diversity Agenda set by the Board from time to time.
  - (b) review, assess and report on the effectiveness and relevance of these measurable objectives, the Group's progress towards achieving them and the adequacy of the Group's programs and initiatives in that regard, on an annual basis.

- 9.2 Any defined measurable objectives should identify ways and, where applicable, specify benchmarks against which the achievement of diversity is measured, in order for the Board to assess and report annually on the Company's progress towards achieving its diversity goals.
- 9.3 In order to set measurable objectives, the Board will assess its current diversity levels and identify where gaps exist. Measurable objectives will then be created which will seek to improve diversity in areas where most development is needed.
- 9.4 There are various measurable objectives which may be implemented by the Company to assist achieving the Diversity Commitments, including:
- (a) procedural and structural objectives;
  - (b) diversity targets; and
  - (c) initiatives and programs.
- 9.5 Where the Group employs 100 or more people, the Board will:
- (a) consider the extent to which the achievement of any measurable objectives should be key performance indicators for the Board and other senior management and require them to report on the achievement of such objectives;
  - (b) where, at the commencement of a financial year, the Company is included in the S&P / ASX 300, seek to ensure that at least 30% of the Company's directors are female;
  - (c) maintain a diverse field of potential candidates for senior management and Board appointments; and
  - (d) consider and, if relevant, implement policies and programs that address impediments to gender diversity in the workplace (including parental leave and flexible working arrangements that assist employees to fulfil their domestic responsibilities, as well as opportunities for employees on extended parental leave to maintain their connection with the Company, and other programs that, over time, help to prepare junior staff for senior management and Board positions), and review these policies to ensure that they are available to and utilised by both men and women at all levels.
- 9.6 Where the Group employs less than 100 employees, the Board of the Company will apply the initiatives set out in this Policy to the extent the Board considers them to be necessary, practical and achievable, and will otherwise manage the Group's diversity strategies on an informal basis, which may include:
- (a) regular review of the Group's diversity and inclusion practices at Board and senior management level against the Diversity Agenda to ensure the Diversity Agenda is being effectively carried out;
  - (b) to the extent necessary and practical, setting measurable objectives for achieving diversity, specifically including gender diversity, in accordance with this policy and the Diversity Agenda set by the Board from time to time.
  - (c) To the extent necessary and practical, review, assess and report on the effectiveness and relevance of any defined measurable objectives, the Group's progress towards achieving them and the adequacy of the Group's programs and initiatives in that regard.

## 10. Roles and responsibilities

Every employee within the Group is responsible for supporting and maintaining the Group's corporate culture, including its commitment to diversity in the workplace.

## 11. Disclosure of diversity objectives

- 11.1 For the purpose of fostering shareholder confidence in the Company, the Company acknowledges that reporting to shareholders on its Diversity Agenda and diversity objectives facilitates greater transparency and accountability in relation to diversity and that such reporting and transparency has been endorsed by the Board.

- 11.2 Where the Group employs more than 100 people, the Company will disclose in its annual report the measurable objectives set by the Board for achieving diversity in accordance with the Diversity Agenda and will report on its progress against those objectives.
- 11.3 In any event, the Company will disclose on an annual basis (within or in conjunction with its annual report) information about:
- (a) the proportion of women employees in the Company;
  - (b) the number of women in management positions; and
  - (c) the number of women on the Board.
- 11.4 The Board will determine the most appropriate method to present this information to ensure that it is accurate and does not falsely represent the participation of women and men within the Company.

## 12. Policy review, changes and publication

- 12.1 The Board will review this policy as necessary to ensure it complies with any applicable legal requirements and remains relevant and effective. External reviews of this policy may be undertaken at the request of the Board.
- 12.2 The Board may change this policy from time to time by resolution.
- 12.3 This policy is not contractual in nature.
- 12.4 This policy is available on the Company's website.

## 13. Interaction with other legislation

This policy applies to the extent that it does not conflict with equal employment opportunity and anti-discrimination legislation in jurisdictions in which the Group operates.

## 14. No obligation

No statement in this policy shall be taken, interpreted or construed so as to endorse:

- (a) a promise of continued employment or of the benefits of that employment;
- (b) the sole criteria for selection and/or promotion of the Company's employees, senior management or Board, other than their overall likely prospect of adding value to the Company and assisting with the Company achieving its corporate goals;
- (c) any conduct by any of the Company's employees, senior management members or Board members which is illegal or contrary to any anti-discrimination, equal opportunities or other legislation or law in any Australian State or Territory or any other foreign jurisdiction; and
- (d) any employee, senior management member or Board member feeling prejudiced by this policy in relation to their employment and/or development of their employment or otherwise, merely because their personal diversity attributes may be more, rather than less, common with others' diversity attributes.

## 15. Questions

Any questions about this policy should be directed to the company secretary of the Company.

## 16. Approved and adopted

The Company is committed to this policy and its implementation and to ensuring that diversity is achieved throughout the Company. This policy was approved and adopted by the Board on 25 September 2020.