

# Equality & Diversity in the Workplace Policy



## Background

Broadspectrum Limited (Broad Spectrum or Company) is a public company, listed on the Australian Securities Exchange (ASX). As an international organisation, Broad Spectrum's workforce and client base represent a spectrum of individual attributes including (but not limited to) cultural and ethnic backgrounds, gender, age and family circumstances. Broad Spectrum recognises the benefits of such diversity and is dedicated to sustaining a work environment that respects individual differences and promotes equality and diversity at all levels of the organisation.

Accordingly, the Board has endorsed this Equality and Diversity in the Workplace Policy to support the Company's commitment to equality and diversity. Our commitment is also reflected in the Code of Business Conduct and applicable local policies and procedures. References in this Policy to Broad Spectrum include its related entities.

## Purpose of this policy

### **The purpose of this Policy is to:**

Set out the benefits of diversity and equality to Broad Spectrum;

- ▶ Promote a fair and inclusive workplace culture free from discrimination and harassment by setting out relevant employee obligations;
- ▶ Set out Broad Spectrum's objectives relating to diversity including but not limited to gender diversity, and the reporting requirements on these objectives; and
- ▶ Provide the standard and guide development of workplace policies and procedures at local levels of the Company.

## Scope

### **This Policy applies to all Broad Spectrum:**

- ▶ Employees;
- ▶ Business Partners; and
- ▶ Wholly and majority-owned operations in all countries in which Broad Spectrum operates. Where Broad Spectrum has a minority interest, there must be compliance with the minimum requirements set out in this Policy, recognising that the manner in which these requirements are met by Business Partners may vary. References in this Policy to Broad Spectrum include its related entities.

## Training and Communication

Broad Spectrum regularly communicates this Policy to Employees across Broad Spectrum through our established communication channels. Employees also receive regular training, in respect of this policy and associated local policies and procedures, in the scope of their employment with Broad Spectrum.

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## Broadspectrum legal obligations

Legal obligations behind this Policy include:

- ▶ laws in relation to workplace equal opportunity, discrimination and harassment that apply in the jurisdictions in which Broadspectrum operates; and
- ▶ ASX Corporate Governance Council Principles and Recommendations, which set out recommendations for ASX-listed entities in relation to establishing and disclosing a diversity policy, and setting and reporting on measurable objectives in relation to gender diversity.

## Definitions – Diversity and Equality

**Diversity** is the range of individual attributes such as cultural and ethnic backgrounds, gender, age and family circumstances present among Broadspectrum Employees. Other individual attributes include marital status, pregnancy, sexuality, disability, religion, political preference, and trade unionism.

**Equality** is the principle of affording Employees fair and equal opportunities in recruitment and selection, remuneration, career development and training, transfers, promotions and succession planning, and termination of employment, without regard to such individual attributes.

## Benefits of diversity and equality

Broadspectrum recognises that diversity as well as respect and appreciation of all Employees are integral to creating a collaborative workplace culture, competitive advantage in a global environment and, ultimately, sustainable business success.

The perspectives and experience present in a diverse and inclusive workforce enhance the quality and depth of decision-making, and improve collaboration and teamwork at all levels of the organisation. Such a workforce is well equipped to provide creative and innovative solutions aligned to the needs of our increasingly diverse and multicultural client base, and to respect, and meaningfully contribute to, the communities in which Broadspectrum operates. The Company believes that an inclusive and fair work environment, free of discrimination and harassment, has a positive impact on the wellbeing of Employees, job satisfaction, productivity and retention within the organisation.

## Equal access to employment opportunities

It is Broadspectrum' policy to comply with all laws governing equal employment opportunity applicable in the jurisdictions in which the Company operates.

It is also Broadspectrum' policy to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – being the skills, experience, qualifications and potential of the individual connected to the job - without regard to gender, age, sexuality, family circumstances, marital status, disability, religion, political preference, trade unionism or any other classification protected by applicable law.

This position also applies to the selection of directors of Broadspectrum Limited, which is outlined in the Board's Nominations Committee Charter.

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Management, Human Resources personnel and all other Employees, are required to:

- ▶ act in a balanced, non-discriminatory manner when making employment-related decisions in relation to other Employees,
- ▶ be aware of, and manage for, unconscious biases and work practices which may lead to exclusion of various groups or unintended discriminatory consequences,
- ▶ adhere to applicable local policies and procedures.

## Initiatives to support diversity

Broadspectrum encourages employment and promotion of individuals from groups that are underrepresented in the Company's workforce, aiming at all times to make employment-related decisions based on merit.

Management will, from time to time, implement various initiatives to increase representation of various groups in the workforce.

## Gender diversity objectives

In accordance with the ASX Corporate Governance Council Principles and Recommendations, the Board of Broadspectrum will regularly establish, review, and assess achievement against, measurable objectives in relation to gender diversity.

The Board has set initial measurable objectives in relation to gender diversity, aiming to increase the level of participation of women throughout the organisation, with particular regard to professional roles in the three layers of the Company below the role of the Managing Director/Chief Executive Officer.

The objectives and progress against them are to be disclosed and assessed yearly in the Annual Report. The Annual Report also includes information on the proportion of female employees in the whole organisation, women in senior executive positions (that is, direct reports to the Managing Director/Chief Executive Officer) and women on the Board.

## Discrimination and Harassment

It is Broadspectrum's policy to keep the workplace free of inappropriate conduct that detracts from principles of diversity and equality, including discrimination (including indirect discrimination) and harassment (including bullying, victimisation and vilification). It is also Broadspectrum's policy to comply with all laws addressing discrimination and harassment in the workforce applicable in the jurisdictions in which the Company operates.

Guided by the Code of Business Conduct and applicable local policies and procedures, Employees are not to engage in any form of discrimination and/or harassment towards other Employees, clients and business partners, at work and work-related functions.

While working in foreign geographic regions, Employees are expected to familiarise themselves with local culture, etiquette, protocol and communication techniques to ensure that their conduct, as a representative of Broadspectrum, is appropriate and culturally sensitive.

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## Role of the Board and the Human Resources Committee

The Board of Broad Spectrum has charged the Human Resources Committee with overseeing the implementation and effectiveness of this Policy.

The Board, on the recommendation of the Human Resources Committee, annually assesses the existing gender diversity objectives and progress in achieving them, as well as reviewing the gender diversity objectives themselves to ensure that, as a whole, those objectives remain appropriate for the Company.

The Human Resources Committee conducts this assessment on a bi-annual basis.

## Consequences for Breach of the Policy

Breach of the discrimination and harassment provisions of this Policy by Employees:

- ▶ Could expose the Company and individuals to civil liability (a financial penalty and liability for damages);
- ▶ Could expose the Company to significant reputation damage; and
- ▶ Will be regarded by Broad Spectrum as serious misconduct which may lead to disciplinary action, including termination of employment or contract.

## Review of this Policy

The Chief Executive, Human Resources is responsible for keeping this Policy up to date. A formal review of this Policy takes place annually.

This Policy will be submitted for review by the Human Resources Committee, who will make recommendations to the full Board. The Board is responsible for approving this Policy.

## Related Documents

This Policy should be read in conjunction with Broad Spectrum's other policies, including:

- ▶ Code of Business Conduct
- ▶ Board Nominations Committee Charter
- ▶ Business Partners Policy
- ▶ Whistleblower Policy
- ▶ Indigenous Relations Policy
- ▶ Reconciliation Action Plan
- ▶ Equality and Diversity in the Workplace Handbook (Australia), and
- ▶ Regional policies, including the Americas Diversity and EEO Statement, and the Equality and Diversity in the Workplace Policies for the Company's Canadian Operations.

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