Diversity policy

InvestSMART Group Limited ACN 111 772 359 (Company)

Introduction

The Company is committed to employee and Board diversity which recognises the strategic and personal advantages that arise from a workplace where decisions are based on merit and all employees are treated equally. Our Company values are set out in our Code of Conduct and include fostering a workplace that is safe and inclusive, where everyone is free to be themselves, free from unlawful discrimination, bullying and harassment.

This Policy applies to the Board and all employees of the Company and the Group.

This Policy is to complement Company employment-related policies and documentation. This Policy does not form part of an employee's contract of employment with the Company or any of its related bodies corporate, nor does it give rise to contractual obligations. However, to the extent that this Policy requires an employee to do or refrain from doing something, and at all times subject to legal obligations, this Policy forms a direction of the Company with which an employee is expected to comply.

ASX corporate governance council's corporate governance principles

To the extent practicable, the Company has adopted the recommendations provided in the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th Edition, 2019) (ASX Corporate Governance Principles) and in particular to the recommendations regarding diversity.

Objectives

This Policy provides a framework for the Company to achieve the following Objectives:

- (a) a diverse and skilled workforce, leading to continuous improvement in service delivery and achievement of corporate goals;
- (b) a workplace culture characterised by inclusive practices and behaviours for the benefit of all employees;
- (c) a work environment that values and utilises the contributions of employees with diverse backgrounds, experiences and perspectives through improved awareness of the benefits of workforce diversity and successful management of diversity; and
- (d) awareness in all employees of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity.

This Policy does not impose on the Group, its directors, officers, agents or employees any obligation to engage in, or justification for engaging in, any conduct which is illegal or contrary to any anti-discrimination or equal employment opportunity legislation or laws.

Benefits of diversity

The Company recognises that organisational performance is linked to workplace diversity. Workplace diversity includes ethnicity, cultural background, gender, sexual orientation, age, martial and family status, religious beliefs, physical abilities, socio-economic background, perspective, experiences or other ideologies. By fostering an inclusive

environment the Company aims to improve employee retention, to embrace different perspectives and to enhance the Group's reputation.

In order to foster an inclusive workplace, the Company cannot and will not tolerate discrimination, harassment, vilification and victimisation.

Board's commitment

The Board is committed to workplace diversity and is responsible for developing strategies to meet the Objectives of this Policy and monitoring the progress of measurable objectives (if any).

Strategies

The Company's diversity strategies include:

- (a) recruiting from a diverse pool of candidates for all positions, including Key Management Personnel and the Board;
- (b) identifying specific factors to be taken into account in recruitment and selection processes to encourage diversity;
- (c) developing a culture which takes account of domestic responsibilities of all employees, regardless of gender and adopting flexible work practices that will assist them to meet those responsibilities;
- (d) taking reasonable steps to ensure that recruitment and selection practices at all levels are appropriately structured so that a diverse range of candidates are considered and guarding against any conscious or unconscious biases that might discriminate against certain candidates; and
- (e) any other strategies the Board develops from time to time.

Monitoring and evaluation

The Board will:

- (a) oversee the implementation of this Policy;
- (b) monitor measurable objectives (if any) for achieving diversity on the Board and in the workplace generally;
- (c) undertake to conduct the annual formal review of the effectiveness of this Policy;
- (d) include the measurable objectives set by the Board (if any) in the annual key performance indicators for Key Management Personnel; and
- (e) ensure the progression of this Policy, including implementing strategies to do so.

Overriding caveat

Nothing in this Policy shall be taken, interpreted or construed so as to endorse:

- (a) the principal criteria for selection and promotion of people to work with the Company being other than their overall relative prospect of adding value to the Company and enhancing the probability of the Company achieving its objectives;
- (b) any discriminatory behaviour by or of the Company contrary to the law, or any applicable codes of conduct or behaviour for the Company and its personnel; or
- (c) any existing person of the Company in any way feeling threatened or 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.

INVESTSMART

Version	Reviewed
2022.05	ARC May 2022