

Corporate Governance Manual DIVERSITY POLICY

Application of Policy:	Global
	This Policy sets out the minimum requirements for the Group and applies to all Personnel and every member of the Group. Where the Group operates in a jurisdiction that imposes a higher standard, or a member of the Group has adopted its own policy which adopts a higher standard, those local standards or the local policy are deemed to be incorporated into and supplement this Policy and in the event of conflict supersede this Policy.

Definitions: Capitalised terms used throughout this Policy are defined in paragraph 12

1. Overview

The Group believes that promoting diversity and equal opportunity contributes positively to our business and performance. We aim to ensure that our workforce, including our Board, is made up of individuals with diverse skills, values, backgrounds and experience to benefit the Company.

Diversity assists us to achieve our objectives and deliver outcomes for our stakeholders, by enabling us to attract, retain and motivate the most suitably qualified and experienced individuals to our workforce. Diversity also accords with the Group's values.

This Policy sets out guidelines by which the Group will endeavour to increase the diversity of its Personnel, including at Board level.

2. Principle

The Group respects and values the competitive advantage of "diversity", and the benefit of its integration throughout the Group, in order to enrich the Group's perspective, improve corporate performance, increase shareholder value, and enhance the probability of achievement of the Group's objectives. Diversity accords with the Group's values, as set out in its Statement of Values.

3. What is "Diversity"

Diversity recognises and values the contribution of people with differences in background, experience and perspectives. Diversity encompasses, but is not limited to, characteristics such as gender, age, ethnicity, cultural background, disabilities, sexual orientation, race, religion, marital or family status, gender identity, socio-economic background, perspective

and experience.

4. **Policy Statement**

The Group believes diversity leads to increased organisational performance and improved culture. The Group is committed to:

- (a) equal employment opportunities;
- (b) attraction and retention of a diverse range of people; and
- awareness of the differing needs of a diverse range of employees. (c)

The Group recognises that employees (male and female) at all levels may have domestic responsibilities. The Group will, to the extent practicable, as part of a balanced working relationship, use its reasonable endeavours to assist personnel to meet their domestic responsibilities.

The Group will aim to provide opportunities for employees on extended parental leave to maintain their connection with the Group including, without limitation, by offering them the option (without any obligation) to receive all-staff communications and to attend work functions and training programs.

Discrimination, harassment, vilification and victimisation will not be tolerated by the Group.

5. Recruitment Selection and Promotion

The Group is an equal opportunity employer and its recruitment and selection protocols are designed to promote equality. All positions, from the Board down, will be determined through processes designed to identify and consider a diverse range of candidates with the most suitable knowledge, skills, experience and personal values relevant to the position. The Group is committed to such processes and to guarding against any conscious or unconscious biases that might discriminate against certain candidates. All candidates will be treated with dignity, respect and confidentiality.

6. Development and Performance

Employees are encouraged to develop and progress their careers regardless of gender, age, seniority or position. The Group offers its employees a wide range of development opportunities with leading external providers that build capabilities and fulfil career aspirations. These opportunities are available to all employees. Employees may seek approval to attend appropriate development opportunities with external providers which will build their capabilities and assist to fulfil career aspirations.

The Group reviews the performance of its employees on an annual basis. These reviews provide the Group with an opportunity to reflect upon the employee's performance, potential and remuneration and enables comparison to relevant peers. Monitoring of remuneration by gender and by position is undertaken to ensure fair outcomes for all employees.

7. Reporting

The Board will review this Policy periodically and assess whether business practices and behaviours are consistent with this Policy, including in relation to the measurable objectives that have been established, or progress towards achieving the measurable objectives.

The Board will, either itself or through the Nomination Committee, set measurable objectives for achieving gender diversity in the composition of the Board, senior executives and the Group's workforce generally, including with respect to one or more specific reporting periods. A measurable objective is one that can be clearly described, monitored and measured.

If the Company is in the S&P/ASX 300 at the commencement of a reporting period, the measurable objective for achieving gender diversity in the composition of its Board should be to have not less than 30% of its Directors of each gender within a specified period.

The Company Secretary will report to the Board on an annual basis the following information:

- the total number of female and male employees and the total number of employees;
- the total number of female and male investment managers and the total number of (b) investment managers; and
- (c) the total number of female and male Key Management Personnel and the total Key Management Personnel.

In its annual report, the Company will report on:

- the measurable objectives set by the Board to achieve gender diversity for that period, and, if the objectives have been altered since the most recent annual report, an explanation of the change;
- (b) the Group's achievement or progress towards achieving the measurable objectives set by the Board to achieve gender diversity for that period (and if the objectives have altered, which set of objectives are being reported against); and
- either: (c)
 - the proportion of women employed (on a full time equivalent basis) by the (i) Group at all levels and at senior executive levels (including how "senior executive" has been defined for these purposes), and the proportion of women on the Board; or
 - (ii) if the Company is or becomes a "relevant employer" under the Workplace Gender Equality Act 2012 (Cth), its most recent "Gender Equality Indicators" (as defined in and published under that Act).

Role of the Nomination Committee 8.

The Company's Nomination Committee will ensure that its Board recruitment and selection practices are appropriately structured so that a diverse range of candidates is considered and that there are no conscious or unconscious biases that might discriminate against certain candidates. The Nomination Committee may also assist the Board as requested with setting measurable objectives for achieving gender diversity in the composition of the Board, senior executives and the Group's workforce generally.

9. Training and Monitoring

The Group will provide initial training in relation to this Policy and thereafter on a periodic basis. The Group will put in place compliance and monitoring programs to review the Group's compliance with the requirements of this Policy.

10. Review and Amendment of this Policy

This Policy will be reviewed periodically by the Board to check that it is operating efficiently and whether any changes are required.

Any amendments to this Policy, other than updates for changes in the Company's branding or position titles, must be approved by the Board.

11. Contacts

Any queries about this Policy should be directed to the Company Secretary.

12. **Definitions**

Defined terms used in this Policy have the following meanings:

Term or Abbreviation	Definition and Explanation
Board	means the board of Directors.
Company	means Omni Bridgeway Limited (ABN 45 067 298 088).
Company Secretary	means the company secretary of the Company.
Director	means a director of the Company.
Group	means the Company and its related bodies corporate (as that term is defined in section 9 of the <i>Corporations Act 2001</i> (Cth)).
Key Management Personnel	means those persons having authority and responsibility for planning, directing and controlling the activities of the Company, directly or indirectly, including any Director (whether executive or otherwise) of the Company.
Managing Director	means the managing director of the Company or such equivalent office.

Personnel	means all full-time, part-time or casual staff, consultants, contractors, secondees and directors of or to the Group.
Policy	means this diversity policy.
Statement of Values	means the values and characteristics applicable to Personnel set out on the Company's website, as updated from time to time.

The most recent amendments to this Policy were approved by the Board take effect on 26 June 2020.