



Diversity Policy

Version 1.3
Updated: December 2019

**smart
group**
corporation

1 Overview

Diversity and Inclusion are at the core of Smartgroup's culture.

We are proud of our Diverse and Inclusive culture, that we are recognised for best practice and that our people feel recognised and supported at work.

The diversity in our teams reflects the diversity in our customers and the communities we support, allowing us to truly connect and deliver outstanding service.

Smartgroup's core values are:

- Teamwork and accountability drive us Beyond Further
- We practice honesty and integrity always
- We have a customer obsession
- We are approachable and open-minded.

The purpose of this policy is to outline Smartgroup's commitment to creating a workplace that is fair, accessible, flexible, inclusive and in which unlawful discrimination, bullying, harassment, vilification or victimisation are not tolerated. The commitment of Management and the Board to this policy demonstrates the importance and value of diversity within the culture of Smartgroup at all levels.

Our culture thrives on mutual respect, teamwork and diversity of thought in the workplace among people who are diverse in work background, experience, perspectives, education, age, gender, race, ethnicity, physical abilities, religious belief, sexual orientation, gender identity, marital or family status and other real and perceived differences. We strive to ensure that our workforce reflects the diversity of our customers and markets, and harnesses the unique talents, perspectives and experiences of all our team members.

Through creating gender balanced and diverse leadership and teams, and a truly inclusive working environment, we are continuing to build an agile, high performing organisation which actively leverages diversity to create competitive advantage.

2 Application

This policy applies to all directors and employees (whether full time, part time or casual) of the Smartgroup group of companies. This policy also extends to consultants, contractors and other persons that act on behalf of Smartgroup and its associates, where reasonable and practical. In this policy, these persons are collectively referred to as "team members".

3 Definitions

Diversity refers to all the characteristics that make individuals different from each other. It includes characteristics such as age, caring responsibilities, cultural diversity, disability, gender, Indigeneity, sexual orientation and religion. Diversity encompasses differences in backgrounds, qualifications and experiences, and other differences in approach and viewpoint.

Inclusion refers to the act of creating workplace environments in which any individual or group feels welcomed, respected and valued to fully participate and contribute.

4 Diversity Strategy

Our strategic intent for Diversity and Inclusion is the attraction, retention and development of a diverse team of skilled people who are increasingly engaged, enabling delivery on our strategy. We have developed a number of Policies to specifically address this intent including our Recruitment and Selection Policy, Parental Leave Policy and Workplace Behaviours and EEO Policy.

Smartgroup will develop strategies, initiatives and programs, overseen by the Board and driven by our Management Team, to promote diversity in line with our principles with a view to:

- Developing collective skills, experience and attributes of team members and senior management across Smartgroup;
- Creating a diverse talent pool of skilled and experienced employees to progress over time into senior management and board positions and
- Ensuring Smartgroup's culture and management systems are aligned with and support this Policy.

We are committed to gender diversity and the fundamental principle that gender is not a barrier to participation and success at any level of our workforce. Where there are shortfalls in achieving our Gender Diversity targets (or opportunities to improve our outcomes), Smartgroup will develop an action plan to address gender imbalance.

Smartgroup will establish measurable objectives, including key performance indicators (KPIs) for the diversity strategies, initiatives and programs (including Gender Diversity) as they are developed. These will be updated regularly in the Diversity and Gender Equality Strategy.

5 Principles

Merit

Decisions concerning all aspects of employment, including recruitment, selection, development, promotion and remuneration, are based on skills, qualification, capabilities, aptitudes and performance.

Fairness and Respect

Smartgroup embraces diversity and equal opportunity and does not tolerate any form of discrimination in the workplace.

Commercial Success

Diversity and equal employment opportunity initiatives are based on sound business principles and objectives. They focus on improving results and value for Smartgroup shareholders, our team members and the communities in which we operate.

6 Diversity in Action

Diversity Programs

Smartgroup has a range of programs in place to drive and improve diversity and inclusion.

Some examples include:

- Merit-based recruitment, performance and reward processes;
- Needs based career development and succession planning processes;
- Internally reviewed and externally benchmarked remuneration practices;
- A range of tailored leave options including parental leave, diversity leave, domestic and family violence leave, career break and additional purchased leave;
- Flexible work arrangements;
- Smartgroup Parents Portal to support all working parents and specifically to manage the transition to parental leave, opportunities to keep in touch on leave and successfully transition back to work.
- Tracking and reporting of gender equality indicators in accordance with WGEA requirements;
- Community programs designed to support the communities within which we work.

7 Responsibility for Promoting Diversity

Team Members

Team members are responsible for:

- Familiarising themselves with the policy; and
- Behaving in a manner that supports diversity outcomes for Smartgroup.

Managers

Managers are responsible for:

- Promoting a culture of diversity within their teams;
- Ensuring team members have open access to policies and procedures regarding diversity;
- Understanding their role in promoting diversity within the organisation, communicating and implementing policies and procedures effectively; and
- Ensuring their management practices and behaviours are consistent with the principles set out in this policy and working with team members to integrate the values of diversity into team practices.

Executive Management Team

The Executive Management Team are responsible for:

- Promoting diversity as an important strategic and cultural factor to achieve business objectives across Smartgroup;

- Consulting with relevant managers, and our Human Resources and Remuneration Committee, propose measurable diversity objectives to the Board to achieve gender diversity, identify ways in which achievement is to be measured and report to the Board on the progress in achieving these objectives;
- Reporting to the Board on diversity issues within Smartgroup and make recommendations;
- Identifying, with our People and Culture Team, ways to promote a culture supportive of diversity, including developing policies, programs and guidelines;
- Implementing, with our Human Resources and Remuneration Committee, programs and initiatives designed to achieve greater gender diversity on the Board and in senior management, including leadership development and succession planning; and
- Introducing appropriate procedures for proper implementation of this policy and a review mechanism to assess the effectiveness of this policy.

The Board

The Board are responsible for:

- Together with senior management, reviewing ways to promote a culture supportive of diversity;
- Reviewing and approving measurable objectives for achieving diversity, including gender diversity across and at various levels of Smartgroup;
- Annually assessing these objectives and the progress in achieving them; and
- Reviewing and monitoring the effectiveness of this policy, including in relation to Board diversity.

8 Related Documents and Applicable Legislation

This Policy operates in conjunction with the Workplace Behaviours and EEO Policy, Recruitment and Selection Policy, Leave Policy and Parental Leave Policy as well as the relevant related procedures or toolkits and applicable state/territory or federal legislation.

- Age Discrimination Act 2004
- Australian Human Rights Commission Act 1986
- Disability Discrimination Act 1992
- Fair Work Act 2009
- Gender Equality Act 2012
- Racial Discrimination Act 1975
- Racial Hatred Act 1995
- Sex Discrimination Act 1984
- State and Territory Workplace Health and Safety laws
- State and Territory Anti-Discrimination Laws

9 Review and Other Information

This policy replaces all pre-existing diversity policies. Smartgroup may vary this policy or procedures from time to time. It does not form part of your contract of employment or override the terms of any contract of employment or award which might also apply to your employment with Smartgroup.

10 Document Control

| Version | Date | Author | Reason |
|---------|------------------|----------------|---|
| 1.0 | 11 November 2017 | Leisa Hartigan | Initial document |
| 1.1 | 5 September 2018 | Leisa Hartigan | Minor update. |
| 1.2 | 1 July 2019 | Leisa Hartigan | Updated template and formatting. Minor wording changes. |
| 1.3 | 11 December 2019 | Leisa Hartigan | Updated content for compliance to revised ASX Principles, new policies and reference to programs. |