



**citadel group**  
MANAGING COMPLEXITY

## Diversity Policy

Terms & Conditions of Employment

Policy Document

July 2020



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## Document Control

Approving Authority	Chief Executive Officer (CEO)
Approval/Issue Date	1 January 2018
Version	Version 2.2
Owner	<ul style="list-style-type: none"> <li>Citadel Chief Financial Officer (<b>CFO</b>)</li> <li>Head of People &amp; Culture</li> </ul>
Users	<ul style="list-style-type: none"> <li>All people who have a role in the Company and each of its subsidiaries.</li> <li>All employees and subcontractors who perform work on behalf of The Citadel Group Limited and each of its subsidiaries (<b>Citadel</b> or <b>Company</b>).</li> </ul>
Obligations	<ul style="list-style-type: none"> <li>The Citadel Register of Delegations</li> <li>The Citadel Code of Conduct</li> <li>The Citadel Purpose and Values</li> <li>Fair Work Act 2009 (Cth)</li> <li>Australian Human Rights Commission Act 1986 (Cth)</li> <li>Disability Discrimination Act 1992 (Cth)</li> <li>Racial Discrimination Act 1975 (Cth)</li> <li>Sex Discrimination Act 1984 (Cth)</li> </ul>

VERSION	APPROVER	PUBLISH	CHANGE
V1.0	Miles Jakeman	12/1/2015	Consolidate all Workplace Behaviours Handbook to reflect recent organisational change.
V1.1	Miles Jakeman	02/02/2015	Update CGL Professional Conduct
V1.2	Miles Jakeman	12/03/2015	Include information on the roles and responsibilities of a Support Person. Added additional definition on Workplace Bullying Expand examples on Bullying in the Workplace.
V2.0	Darren Stanley	1/5/2016	Update and improve guidelines to promote effective dispute/conflict resolution in the workplace.
V2.1	Darren Stanley	1/5/2017	Included Performance Management, Termination and Drug & Alcohol Policy, Leave Policy, Development & Training Policy Recruitment, Induction & Selection Policy
V2.2	Darren Stanley	01/01/2018	Updated Diversity Policy into new format and simplification of
V5	Board	25/05/2020	Updated Diversity Policy to include gender targets and comply with 4 <sup>th</sup> Edition.



# 1 DIVERSITY POLICY

## 1.1 PURPOSE

Citadel respects and values the diversity of its employees, customers and stakeholders and is committed to finding ways to actively support and encourage a diverse workforce and inclusive workplace now and in the future.

Diversity and equity principles are integrated into our recruitment, work practices and performance development policies and procedures. The objective of this Policy is to improve our business success by ensuring that we:

- > attract, develop and retain the best possible Employees;
- > create a work environment (Culture) that embraces and combines the principles of equity and diversity in all that we do; and
- > provide a healthy, safe and secure work culture.

## 1.2 DEFINITIONS

**Culture** The aggregation of observed behaviours across all employees in the organisation arising from the tone from the top, reflected in our shared values and beliefs and shaped by symbols, systems and structures adopted by the organisation.

**Diversity** The term used to describe the differences and uniqueness of all people. It includes skills, knowledge, education, personality, experiences and perspectives of individuals and groups and includes characteristics such as:

- > age;
- > gender;
- > family responsibilities;
- > relationship status;
- > race;
- > religious belief;
- > cultural identity & background;
- > ethnicity;
- > sexual orientation;
- > gender identity;
- > intersex status;
- > socio-economic background;
- > physical and intellectual ability;
- > indigenous background; and
- > English language skills.

**Inclusion** Describes an environment where everyone is able to be themselves and feel valued, involved and respected for their perspectives and contributions. An inclusive workplace:

- > values the diversity of its employees, customers and stakeholders;
- > upholds the right of every employee to be treated with respect and fairness whilst performing their work;
- > is fair and equitable; and
- > is free of discrimination, harassment, bullying and other unlawful behaviour.

**WGEA** means the Workplace Gender Equality Agency.

## 1.3 SCOPE

This Policy applies to ongoing, non-ongoing & casual employees within Citadel and supersedes all previous policies relating to diversity.



## 1.4 POLICY

### Our Commitment

Citadel is committed to providing an organisational culture and workplace that fosters diversity and inclusion across all levels of the business. We will achieve this through eliminating stigmas and limitations and creating a culture of inclusion through the promotion of education, awareness and mutual understanding.

It is our policy to treat all employees, prospective employees, agents, contractors, customers or suppliers fairly and equally regardless of their race, colour, sex, sexual preference, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction or social origin.

Citadel will not tolerate unlawful discrimination, harassment, workplace bullying or victimisation in the workplace. Breach of this Policy may result in disciplinary action, up to and including termination of employment.

### Inclusive Culture

Citadel is committed to creating a sustainable and inclusive environment for all employees and stakeholders. This includes policies and behavioural expectations to keep our workplace fair and encourage a culture of mutual respect. We also focus on the physical and mental wellbeing of our people.

Our inclusive culture is strengthened through encouraging and recognising creativity, innovation and thought leadership.

### Cultural Diversity

Citadel values cultural diversity among individuals and groups, and acknowledges that cultural diversity encompasses differences based on:

- > age;
- > gender;
- > family responsibilities;
- > relationship status;
- > race;
- > religious belief;
- > cultural identity & background;
- > ethnicity;
- > sexual orientation;
- > gender identity;
- > intersex status;
- > socio-economic background;
- > physical and intellectual ability;
- > indigenous background; and
- > English language skills.

### Gender Diversity

Citadel aims to create a culture that values, promotes and benefits from gender diversity and equality. We will ensure equal rights and opportunities for people through regular remuneration reviews to identify any gender pay gaps, attract and develop female talent and educate our people leaders about gender equality. Our policies will be regularly updated to reflect our processes for ensuring gender equality and opportunity in the workplace.

### Recruitment & Selection

Citadel fosters a culture where qualified applicants are recruited, developed and promoted on the basis of merit and their alignment to our organisational values.

We are committed to ensuring that recruitment and selection practices are transparent and equitable. This involves ensuring that qualified applicants from a diverse range of backgrounds have the opportunity to apply and be considered for available roles, and that there is no unlawful discrimination.

## Flexible Work Practices

Citadel is committed to supporting our people to balance their work and caring responsibilities. We provide a workplace that supports team members to access and utilise paid parental leave, part-time and other flexible working arrangements.

## 1.5 RESPONSIBILITIES

The Board will annually review and assess the diversity targets set for the Company and its progress in achieving them.

The Executive & Organisational Leadership Groups are responsible for implementing, monitoring and reporting to the Board on initiatives to achieve diversity and inclusion objectives.

Leaders are responsible for ensuring their management practices and behaviours are consistent with the principles set out in this policy.

Team members are responsible for ensuring their behaviour is consistent with the principles set out in this policy.

## 1.6 REPORTING

Measurable objectives and targets for diversity are contained within the People & Culture Strategic Plan and are reported on annually to the Nomination and Remuneration Committee, and to the Board.

Additionally, Citadel reports annually to the WGEA regarding its current gender profile and remuneration. Citadel has set itself the following gender diversity targets from 1 July 2020:

STRATEGIC FUNCTION	OUTCOMES	MEASURE	IMPLEMENTATION STRATEGIES
Community	<i>Diversity - To be a diversity leader, advocate in the industry and to build capability and best practice standards</i>	<ul style="list-style-type: none"> <li>❖ 75% of balanced diversity for new hires throughout the business.</li> <li>❖ Gender balance across all divisions improved by 10% by end of FY 2021.</li> </ul>	<ul style="list-style-type: none"> <li>❖ Raising cultural awareness, educating and providing employment and development opportunities.</li> <li>❖ Providing opportunities for those transitioning into retirement.</li> <li>❖ Providing access for women returning to work (feeding rooms/ facilities)</li> <li>❖ Ensuring that employees have full access to the Employment Assistance Program provider (EAP).</li> <li>❖ Providing a flexible workplace.</li> <li>❖ Paying everyone the same.</li> </ul>

The Board reserves the right to adjust targets based on any significant employment or commercial sector changes during the policy period.

## 1.7 SUPPORTING POLICIES

- > Code of Conduct
- > Bullying, Harassment and Grievance Resolution Policy
- > Parental Leave Policy
- > Performance Management Policy
- > Recruitment, Selection and Onboarding Policy
- > Working from Home Policy



## 1.8 POLICY REVIEW

This Policy, and the Company's performance toward meeting its gender diversity targets will be reviewed at least annually by the Nomination and Remuneration Committee.

This policy may be reviewed at other times as the Nomination and Remuneration Committee sees fit.

## 1.9 POLICY ADOPTION

This Policy was adopted by the Board on 25 May 2020 and is effective from 1 July 2020.

This policy is available on the Company's website.

The Policy may be amended by resolution of the Board.