

Diversity and Inclusion Policy

February 2025

Context & Purpose

At Xenith we are guided by our Company Values & Expected Behaviours. These are the foundation of how we conduct ourselves and interact with each other, our clients, suppliers, shareholders, and other stakeholder.

Xenith (the Company) is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair trading, honesty and integrity in our business activities.

This policy has been put in place to ensure any concerns raised regarding any misconduct or improper state of affairs or circumstances in relation to the Company's business are dealt with effectively, securely, appropriately, and in accordance with the Corporations Act 2001 (Cth) ;p the Taxation Administration Act 1953 (Cth) and any other relevant Commonwealth legislation that governs a Company's business (collectively referred to as 'the Act').

The Company encourages the reporting of any instances of suspected unethical, illegal, corrupt, fraudulent, or undesirable conduct involving the Company's business and provides protections and measures to individuals who make a disclosure in relation to such conduct without fear of victimisation or reprisal.

This policy will be provided to all employees and officers of the Company upon commencement of their employment or engagement and will also be available via Employment Hero.

The policy is also available to persons outside the organisation and can be accessed on the Company website.

Scope

The purpose of this policy is to outline the value that we see in diversity and inclusion, and the benefits these bring to our company.

A failure to meet any of the objectives referred to in this policy is not intended to create consequences for employees, except where the failure to observe our diversity initiatives gives rise to discrimination, harassment, bullying or victimisation.

Accordingly, this policy is intended to provide guidance on:

- what workplace diversity is and its benefits
- our key principles and metrics for assessing diversity
- our responsibilities in respect of workplace diversity.

Policy

Guidelines and Scope

What is workplace diversity?

Workplace diversity is a means of promoting collaboration and empowerment in the workplace by embracing our people.

Diversity includes our individual unique characteristics such as our race, gender, ethnic and cultural backgrounds, age, sexual orientation, religion, social and educational status, family responsibilities and other variables.

Inclusion of diversity in our workplace is where people feel, and are, valued and respected irrespective of their personal attributes, characteristics or circumstances, and where they:

- have the opportunity to progress in their employment without disadvantage or less favourable treatment
- have access to resources which facilitate professional development
- can contribute their perspectives and talents to improve their organisation
- have a sense of belonging.

Diversity is the shared responsibility of all employees. The company recognises that to have an inclusive workplace, discrimination, harassment, vilification and victimisation cannot and will not be tolerated.

Key Principles

Managing diversity successfully means creating an environment that values and utilises the contributions of different people. This enables us to attract and retain the best talent and improve employee satisfaction and productivity. This is critical to better decisions being made and developing more innovative business solutions to improve the success of the company through improved client service.

To achieve a diverse workforce, we are steadfast on fostering a workplace culture that is welcoming, celebrates diversity and is accommodating. This means that we need to treat all people with dignity and respect, and adopt organisational methods and systems of work which promote inclusivity, including through the following principles:

Service to our customers: The diversity of our workforce should reflect our customers and the diverse communities we work with every day.

Gender equality: Women and men have a right to equal participation in the workplace. Gender equality ensures that all employees have access to equal opportunities in developing their careers in a workplace free from bias.

Remuneration and reward: We are committed to equal pay for equal work and rewarding our people fairly. Accordingly, we will seek to ensure that there is no direct or indirect wage discrimination towards or against different employees.

Supporting flexible working: Our focus is on having an agile work environment where every person can thrive. We are committed to providing opportunities for employees through flexible working arrangements for a fixed period or on an ongoing basis.

Recruitment and promotion: Diversity will be actively promoted during our recruitment and promotions processes by applying the values contained in this policy. Accordingly, performance will be measured against agreed objectives to promote equitable outcomes in terms of recognition and/or reward.

Training: The company will provide training on diversity, in addition to discrimination, harassment, bullying and our code of conduct. This training is designed to raise awareness and encourage behaviour that supports a work environment that embraces diversity.

Key Metrics

Some key metrics that we can apply to measure the success of this policy include:

- reviewing representation at senior levels of the company

- maintaining accurate records of the composition of the company's workforce at all levels in respect to relevant aspects of diversity
- assessing pay equality of employees undertaking the same work
- identifying existing flexible work arrangements
- parental leave return rates
- considering exit interview data.

Our Responsibilities

Promoting workplace diversity is everyone's responsibility, at all levels within the business. We all have a responsibility to foster a culture in the workplace where diversity is valued and supported.

Company responsibilities

We make a commitment to workplace diversity through our initiatives and decision making, and in compliance with any statutory obligations

To the extent possible, we will provide employees with a safe work environment free from discrimination, harassment, and bullying.

We will continue to demonstrate and embrace the principles of workplace diversity by building a culture of inclusivity where diversity is recognised and valued.

Manager responsibilities

- Consult regularly with employees in developing and maintaining workplace practices that support professional development, and provide flexibility for employees, as required.
- Ensure that diversity and inclusion strategies and actions are based on a consultative process that engages multiple stakeholder groups and involves the participation of a diverse range of people.
- Ensure that all relevant company processes and policies are reviewed for unconscious bias.
- Consistently and actively support and encourage employees to participate in workplace diversity education activities.
- Ensure that all performance agreements recognise, value and utilise the individual skills and strengths of employees.
- Uphold merit principles when recruiting and selecting employees.

Your responsibilities

- Treat everyone with courtesy and respect.
- Demonstrate behaviours that contribute to the enhancement of a culture in which diversity is valued.
- Comply with the company's policies, including is Code of Conduct.
- Participate in training and report concerns to prevent or eliminate differential treatment, including all forms of bullying or harassment.

Questions

This policy does not cover every possible event or action. There will be circumstances where it is difficult to know what to do. In such cases you must exercise caution and common sense and comply with the

underlying principles of this policy. If you have any questions or doubts about this policy please direct them to your supervisor, manager, human resources or a senior manager.

Support Available

Any employee who makes a disclosure under this policy or is implicated as a result of a disclosure that is made may access the Company's Employee Assistance Program (EAP) which is a free and confidential counselling service provided by EAP Assist.

Make an appointment - EAP Assist

Where appropriate, the Company may also appoint an independent support person from the Human Resources team to deal with any ongoing concerns you may have.

Other Matters

Any breach of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment.

In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee's written employment contract.

Disclaimer

The Company reserves the right to amend or rescind this procedure at any time without notice.

Document Control

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