DIVERSITY AND INCLUSION POLICY

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St Barbara Code of Conduct Framework

This Policy is one component of St Barbara’s Code of Conduct Framework. At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:

- Diversity & Inclusion Policy
- Equal Employment Opportunity Policy
- Health & Safety Policy

(= Policy published on www.stbarbara.com.au)

- Community Relations Policy
- Donations, Sponsorships and Community Programs Policy
- Environmental Policy

(O = Document in preparation)

- Anti-Bribery and Anti-Corruption Policy (inc. Gifts, Entertainment and Hospitality)
- Code of Conduct
- Conflict of Interest and Related Parties Policy
- Securities Dealing Policy
- Whistleblower Policy

(= Internal document published on ROCKi)

- Continuous Disclosure and External Communication Policy
- Privacy Policy
- Risk Management Policy
- Social Media Policy

Key internal documents

- Domestic & Family Violence Policy
- Fitness for Work Policy
- Grievance Resolution Framework
- Leadership Framework
- Mental Health Policy
- Workplace Discrimination and Harassment Guideline

(= Policy published on www.stbarbara.com.au)

- Health, Safety, Environment and Community Management System

(O = Document in preparation)

- Whistleblower System

(= Internal document published on ROCKi)

Key internal documents

- Delegation of Authorities Matrix
- IT Usage Guideline
- Procurement Policy
- Records Management Policy
- Risk Management Framework
- Treasury Policy

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1. OVERVIEW

St Barbara Limited and its subsidiaries (St Barbara) recognises that a diverse and inclusive workforce supports a high performance culture and is actively seeking to enhance the diversity of the workforce including manager and non-manager roles, the senior management team and Board of Directors.

St Barbara is an equal opportunity employer and employs on the basis of role requirements with selection based on qualifications, skills and experience.

In promoting a culture that embraces diversity and inclusion, and to illustrate this commitment, St Barbara has developed the Diversity and Inclusion Policy (Policy).

The Policy actively facilitates a more diverse and representative workforce and management structure, whilst ensuring that the best qualified and experienced people are recruited and retained according to St Barbara’s circumstances at all times.

St Barbara is committed to:

- creating a workplace that promotes equal opportunity, diversity and inclusion;
- maintaining a workplace where all personnel (including employees and contractors) are able to perform their duties free from all forms of unlawful discrimination and harassment;
- promoting an inclusive culture where fairness and equity leverages the unique skills and abilities of every employee, and where respect, equity and positive recognition of differences are appreciated;
- the recruitment of employees and board members from a diverse pool of qualified candidates;
- understanding and articulating the benefits arising from diversity and inclusion;
- supporting diversity, inclusion and gender equality in relation to recruitment, retention, performance management, promotions, talent identification, succession planning, training and development, restructures and operational changes;
- supporting the workforce in relation to family and caring responsibilities;
- identifying and addressing pay equity issues; and
- ensuring practices and procedures across St Barbara are carried out in accordance with this Policy.

St Barbara aims to be a leader in the industry for diversity and inclusion through advocacy, representation, identifying best practice, consultation and innovation.

St Barbara will not tolerate unlawful discrimination, harassment or victimisation in the workplace.

2. SCOPE

Although St Barbara recognises that the concept of diversity incorporates a number of different factors, gender and Indigenous engagement have been identified as key areas of focus. Specifically, St Barbara is committed to achieving adequate representation of women across St Barbara, including on the Board of Directors and within senior management roles as well as representation of Indigenous people in the workforce.
St Barbara intends for this Policy to be read in conjunction with its Code of Conduct, Equal Employment Opportunity Policy and Workplace Discrimination and Harassment Policy.

This Policy may be amended from time to time.

3. ROLES AND RESPONSIBILITIES

The Board of Directors are responsible for:

a) Reviewing and approving the St Barbara Diversity and Inclusion strategies including gender equality, flexible working, Indigenous Engagement, Domestic and Family Violence

b) Setting measurable diversity objectives

c) Annually assessing these objectives and progress to achieving them.

The Executive Leadership Team are responsible for:

a) Recommending diversity and inclusion objectives to the Board for consideration;

b) Implementing this Policy including initiatives that promote and support a diverse workforce in which employees feel empowered and encouraged to perform at their best.

The General Manager Human Resources is responsible for the governance of Diversity and Inclusion.

All leaders are accountable to contribute to St Barbara’s diversity objectives and are expected to build diversity into their teams and to demonstrate, through their behaviours and actions, commitment to fostering a diverse and inclusive culture where diversity is valued and individual differences are understood, respected and valued.

All employees are responsible for contributing to a culture in which diversity is valued and individual differences are understood, respected and valued.

4. ANNUAL DISCLOSURE

St Barbara will disclose annually in its Corporate Governance Statement the measurable diversity objectives and the progress in achieving those objectives as set by the Board of Directors.

This will include disclosure on the proportion of women in the organisation, in senior executive roles and on the Board of Directors as well St Barbara’s overall gender pay gap and proportion of Indigenous employees.

St Barbara will also include in its Corporate Governance Statement an indication of gender diversity which the Board of Directors consider desirable from time to time in Board membership.
5. POLICY PUBLICATION

This Policy or a summary of its main provisions will be made available on St Barbara’s website.

6. POLICY REVIEW

The Remuneration and Nomination Committee will review this Policy and report to the Board annually on St Barbara’s progress towards achieving its stated diversity and gender equality objectives.