

DIVERSITY AND INCLUSION POLICY

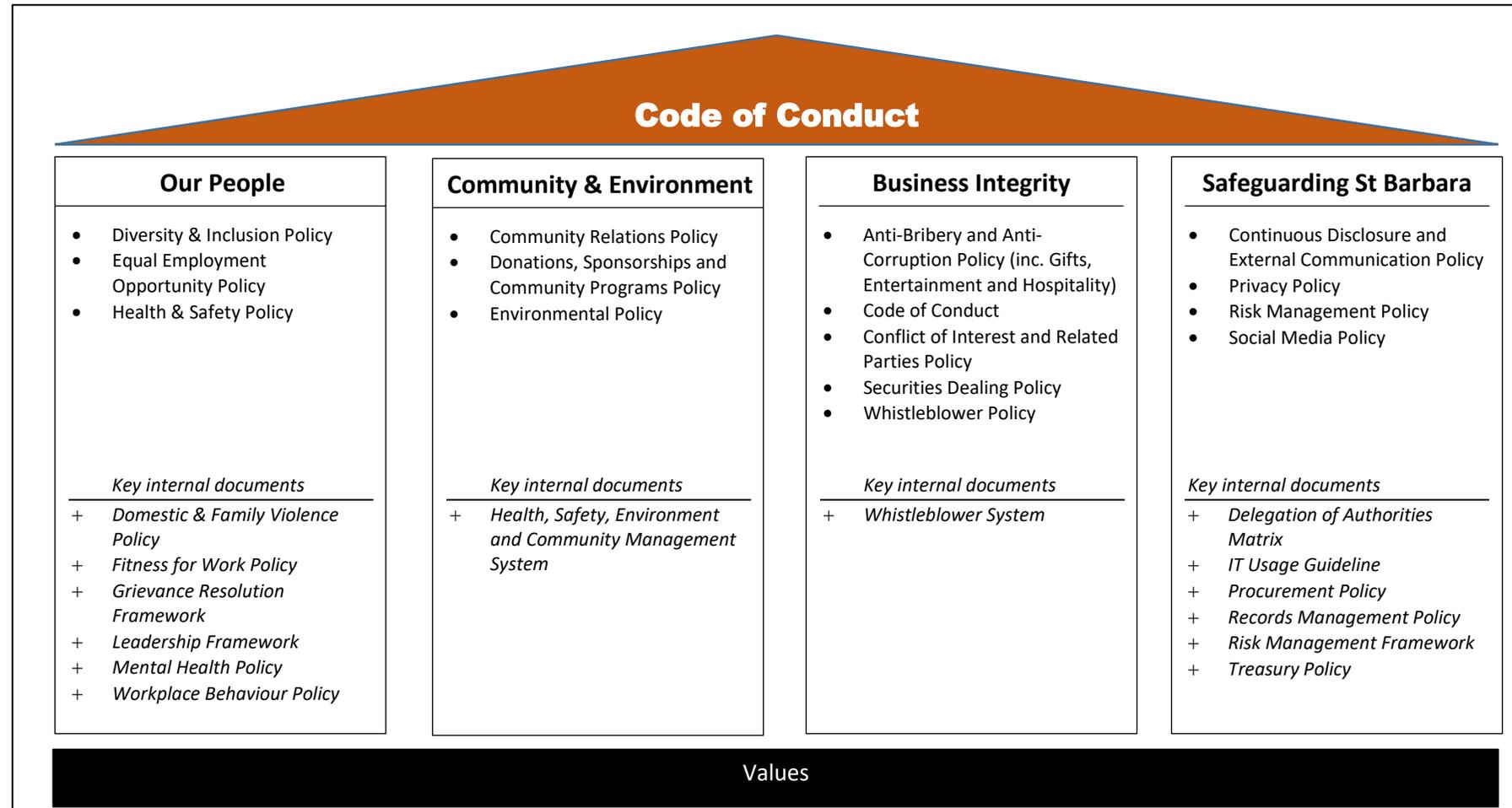
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St Barbara Code of Conduct Framework

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:



● = Policy published on www.stbarbara.com.au

○ = Document in preparation

+ = Internal document published on ROCKi

1. OVERVIEW

St Barbara Limited and its subsidiaries (**St Barbara**) recognises that a diverse and inclusive workforce is critical to ensuring a high performance culture where people are respected, their individual contribution valued and a safe and supportive work environment is fostered.

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 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.

The Policy also encourages an inclusive culture that embraces diversity of thought, experience and background, which further aligns to the company’s commitment to organisational effectiveness and building brilliance.

The Company is committed to actively encouraging and promoting an inclusive work environment and enhancing 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. Consideration is also given to ensuring appropriate representation from the communities in which St Barbara operates, including Indigenous representation, while recognising the associated need to invest in upskilling the community.

In 2020, St Barbara launched five leading commitments to guide our decisions, actions and behaviours and ensure we do the right thing.

				
SAFETY ALWAYS	EMPOWERED PEOPLE DIVERSE TEAMS	STRONGER COMMUNITIES	RESPECTING THE ENVIRONMENT	GROWING SUSTAINABLY
Zero harm is always our target. Zero harm to all people as we responsibly operate our assets to their full potential. This focus on safety guides everything we do.	We are an employer of choice committed to inclusion and diversity. We provide a caring work environment where our talented people are happy, thrive, feel safe and can fulfil their potential.	We strive to help our communities thrive, grow and prosper. We build meaningful relationships, investing time and energy to ensure local communities are enriched by being our neighbours.	We are committed to caring for the environment. We think differently to find solutions to actively manage and neutralise our impact; because we care about the environment and our planet.	Growing our business sustainably, where it makes sense, and with strong governance practices, means we can add value for everyone: our shareholders, our people and our communities.

These commitments, complemented by our values, underpin our vision to be a brilliant, global mining company that grows sustainably and creates enduring, positive impacts.

St Barbara’s Commitment ‘Empowered People, Diverse Teams’ states: *We are an employer of choice committed to inclusion and diversity. We provide a caring work environment where our talented people are happy, thrive, feel safe and can fulfil their potential.* St Barbara is committed to achieving this by:

- 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 person, 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 equality in relation to recruitment, retention, performance management, remuneration, 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

St Barbara recognises that the concept of diversity incorporates a number of different factors, with gender and Indigenous engagement identified as key areas of focus given their particular relevance to the industry and jurisdictions in which the Company operates.

Specifically, St Barbara is committed to achieving 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 Behaviour Policy.

This Policy may be amended from time to time.

3. ROLES AND RESPONSIBILITIES

The Board of Directors is responsible for:

1. Reviewing and approving the St Barbara Diversity and Inclusion strategies including, but not limited to; gender equality, flexible working, Indigenous engagement, domestic and family violence;
2. Setting measurable diversity objectives annually; and
3. Regularly assessing these objectives and progress to achieving them.

The Executive Leadership Team is responsible for:

1. Recommending diversity and inclusion objectives to the Board for consideration; and
2. Implementing this Policy including initiatives that promote and support a diverse workforce and inclusive workplace in which employees feel empowered and encouraged to perform at their best.

The Executive General Manager People is responsible for the governance of diversity and inclusion.

All leaders are accountable to contribute to St Barbara's diversity and inclusion strategies and are expected to ensure diversity of their teams and demonstrate, through their behaviours and actions, commitment to fostering an inclusive culture where diversity is celebrated and individual differences are understood, respected and valued.

All employees are responsible for contributing to creating and positively building on this culture.

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 on an annual basis and report to the Board throughout the year on St Barbara's progress towards achieving its stated objectives.