

Purpose and Scope

This policy ensures Coventry Group Ltd (CGL) operates in compliance with the ASX Corporate Governance Principles and Recommendations on diversity. Within CGL diversity means all things that encompass gender, sexual orientation and gender identity, race, ethnicity, cultural background, age, marital or family status, language, physical abilities and religious beliefs.

Definitions

Employee	Includes any person who works for CGL as a direct employee, trainee, apprentice, outworker or work experience student; contractor/sub-contractor and their employees, or an employee of a labour hire company assigned to work for CGL.
Equal Employment Opportunity	All people will be treated equally or similarly and not disadvantaged by prejudices or bias. This means that the best person for a job or a promotion is the person who earns that position based on qualifications, experience and knowledge.
Diversity	Refers to the visible and invisible differences that exist between people including, but not limited to, gender, culture, race, ethnicity, physical impairment, sexual orientation, age, language, religion, nationality and family/marital status.
Grievance	Grounds for complaint. May relate to a decision, behaviour, act or omission that an employee feels is unfair, discriminatory, unjustified, unlawful behaviour, or breaches any CGL policy.
Victimisation	When an employee is treated unfairly because they made a complaint or supported another employee making a complaint.
Vilification	Incite hatred towards, serious contempt for, or severe ridicule of a person because of their race, religion, sexuality or gender identity.
Work Environment	Anywhere work is conducted, or when employees are representing CGL. Including but not limited to external CGL functions/activities.

Authority

The Executive Leadership Team (ELT) is to authorise all policies. This policy was prepared by the General Manager, People, Safety, Wellness and Quality and is known in this policy as the Policy Owner.

Responsibilities

Except in the matter of Board composition, the Board has delegated responsibility for implementation of this policy to the Chief Executive Officer (CEO) who will monitor the progress and report to the Board on the effectiveness of equal opportunity and diversity issues.

The CEO, with the ELT will be responsible for the continual improvement in workplace diversity by setting and reviewing internal diversity goals. The progress and achievement of these goals will be reported to the Board.

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

Employees are responsible for living the values set out in the CGL Code of Conduct and role modelling inclusion without vilification.

Policy

CGL is committed to a work environment that values and promotes diversity. By encouraging and fostering equal opportunity and diversity, CGL is able to attract people with the best abilities and attributes to develop a workforce which is best placed to deliver value to our shareholders, customers and community in which we operate.

This policy supplements CGL's employment practices and procedures as well as our Code of Conduct and outlines our commitment to improving diversity in the work place.

CGL is committed to further developing initiatives which include:

- ensuring recruitment and selection practices reflect the principles of diversity and the Equal Employment Opportunity Act,
- creating a work environment that values and utilises contributions of employees with diverse backgrounds, experiences and perspectives,
- Supporting the promotion and talent management of a diverse pool of skilled and experienced employees in management positions and more generally increasing the representation across the Company,
- establishing mentoring, networking and development programs, and
- recognising employees (female and male) at all levels may have domestic responsibilities and, where practicable adopt flexible work practices, which will assist them to meet those responsibilities.

Associated Documents

- HR 100 Code of Conduct
- HR 101 Discrimination, Bullying and Harassment Policy
- HR 102 Grievance Policy
- HR 104 Conflict of Interest Policy

Policy History

<u>Description</u>	<u>Reference #</u>	<u>Date</u>	<u>Authority</u>
Original Policy	HR 700 00	May 2004	Unknown
Revision #1	HR 700 01	May 2015	The Board
Diversity Policy re-write	HR 001 03 (R 2.0)	May 2018	ELT
Document Control	HR 103 (R 2.1)	June 2018	ELT
Next Review Due		June 2020	

