

Diversity, Equity & Inclusion Policy

1. Scope

This Policy applies to all Cromwell people and entities across the Group.

2. Policy Statement

Diversity is both the visible and invisible differences (age, sexual orientation, gender identity, disabilities, neurodiversity, ethnicity, religious beliefs, cultural and linguistic background, socio-economic background, perspective, and experience) that make each of us unique. Equity refers to fair treatment for all people, so that the norms, practices, and policies in place ensure identity is not predictive of opportunities or workplace outcomes. Inclusion is about creating an environment where we all feel connected, safe, respected and valued and able to be our true and best selves.

At Cromwell, we are dedicated to fostering an equitable workplace where diversity is not only appreciated but actively promoted. Our goal is to cultivate a culture of respect and inclusivity, where every individual feels valued and empowered.

3. Roles, Responsibilities and Delegations

This Policy will be reviewed by the Head of Corporate Operations, and subsequently the Nomination and People Committee annually.

The Company Secretary will ensure that the Nomination and People Committee Charter reflects its role under this Policy.

4. References

Documentation

ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4th edition)

Legislation

Relevant to this Diversity Policy, Cromwell is a 'relevant employer' under the *Workplace Gender Equality Act 2012* (Cth) and complies with the reporting, notification and access requirements.

5. Policy Content

5.1 Diversity & Inclusion at Cromwell

Diversity and Inclusion are at the core of our values;

We are accountable: We hold ourselves accountable for our achievements by being transparent about our progress. We continuously measure our progress and report back to our people, our Board and external stakeholders.

We are progressive: We challenge ourselves to embrace new perspectives. We will listen to our people and our communities. We learn from their lived experiences, value their unique perspectives and remain agile in our approach to our Diversity and Inclusion Strategy.

We are collaborative: We include our people on the journey. We have many passionate supporters of Diversity and Inclusion across Cromwell, many of whom play pivotal roles in our D&I Committee and Employee Resource Groups. We respect the diverse and unique perspectives of our employees and create opportunity for them to contribute to shaping our strategy as it evolves.

5.2 Safety & Culture

Cromwell is committed to protecting both the physical and psychological health, safety and wellbeing of its employees. Cromwell has a Sexual Harassment Policy, an Equal Employment Opportunity Policy and a Grievance Procedure which underpin our commitments to preventing and responding to discrimination, bullying and harassment in the workplace.

5.3 Recruitment & Selection

We recruit in a way that complies with our legislative and regulatory requirements, attracts a diverse range of talent, and aligns with our values. The People & Culture team supports Hiring Managers to:

- Think broadly about the benefits of a team and an organisation with a diverse range of skills, experience, and perspectives.
- Review job descriptions and advertisements to eliminate bias and encourage a diverse range of candidates to apply.
- Be mindful of using inclusive language and behaviour during recruitment activities to encourage a diverse range of applicants.
- Be mindful, and keep in check, their biases, both conscious and unconscious.
- Use consistent, fair and equitable selection practices.

5.4 Flexible Work Practices

Cromwell acknowledges that people have commitments and interests outside of work and are committed to supporting them to achieve their work and personal goals. Australian employees who are carers, >55 years old or have a disability can request flexible working arrangements under the National Employment Standards. All employees can access a level of choice of how, when and where they work via Cromwell's Agile (Australia) Working Policies, in order to support an effective work and life balance.

5.5 Diversity Committee

Cromwell has a Diversity, Equity and Inclusion Committee made up of representatives from various departments and employee levels across the business. The mission of the Diversity, Equity and Inclusion Committee is to support the execution of the Diversity, Equity and Inclusion Strategy, advocate for and champion cultural change that promotes greater diversity and an inclusive organizational culture. The Committee is a link between the Leadership Team and the business as well as a forum for consultation, discussion and leveraging of resources.

5.6 Diversity, Equity & Inclusion Strategy

Cromwell has a Diversity, Equity and Inclusion Strategy which outlines the goals and action plans to be achieved. We acknowledge that Diversity, Equity, and Inclusion priorities will vary across each of the communities in which we operate, influenced by the local context. The Board will adopt (on recommendation from the Nomination and People Committee) measurable objectives for each financial year to ensure that targeted action toward increasing Cromwell's diversity and inclusiveness occurs. The objectives should be appropriate and meaningful and able to be measured and monitored for effectiveness. Specifically, they will include the Board's target with regard to gender equity in Board composition.

Notwithstanding anything to the contrary in this Policy, this Policy does not impose an obligation on any Cromwell Director, officer or employee to engage in, or justify engaging in, any conduct which is illegal or contrary to any anti-discrimination or equal employment opportunity laws in any State or Territory of Australia in which Cromwell operates.

5.7 Reporting progress

We regularly measure progress against our targets and objectives, and report back to our People and our Board.

As part of our annual reporting process, we publicly disclose our achievements against diversity objectives, other relevant people metrics, and key inclusion and diversity initiatives we have focused on throughout the year.

We provide additional reporting on gender equity outcomes within our statutory reporting under the Workplace Gender Equality Act (WGEA).

6. Review & Changes

This policy was reviewed and approved by Cromwell's Nomination and People Committee 7 May 2024.