

# Diversity & 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 (gender, family status, age, sexual orientation, gender identity, disabilities, ethnicity, religious beliefs, cultural background, socio-economic background, perspective and experience) that make each of us unique. Inclusion is about creating an environment where we all feel connected, respected and valued and able to be our true and best selves.

Cromwell is committed to creating an inclusive workplace where diversity is valued and promoted because:

- We are made up of many individuals with unique differences but together; We are Cromwell.
- We exist to look after people. We are a people business – the stronger our people, the stronger our business.
- We strive for outperformance. Inclusion promotes a sense of belonging and wellbeing which increases engagement, and in turn, promotes strong performance.
- We are principled, respectful and responsible. We do the right thing by people.

## 3. Responsibilities

---

This Policy will be reviewed by the Company Secretary, the Head of People & Culture, the Diversity and Inclusion Specialist, and subsequently the Board annually.

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

## 4. References

---

### 4.1 Documentation

#### 4.1.1 Name

ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (4<sup>th</sup> edition)

## 4.2 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, progressive and collaborative.

We have a set of D&I Principles which guide the everyday behaviour of our people and stem from our values:

- We recruit from a diverse pool
- We select objectively, based on Key Skill Behaviours and common values
- We address inequality
- We call behaviour which doesn't align with these principles
- We schedule meetings and events inclusively
- We are empathetic to our people's commitments
- We ensure everyone gets an equal opportunity to contribute
- We use inclusive language
- We recognise the value of diversity
- We remunerate fairly
- We assess performance objectively
- We are conscious of our biases

We aim to:

- Create a culture of respect and inclusion; and
- Value and foster diversity.

We will do so by setting tangible action plans, measuring and reporting progress and creating executive accountability.

### 5.2 Culture

Cromwell is committed to protecting the health, safety and wellbeing of its employees and preventing discrimination and sexual harassment. Cromwell has a Sexual Harassment Policy, an Equal Employment Opportunity Policy and a Grievance Procedure.

### 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.
- 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. 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) and Hybrid (Europe) Working Policies, in order to support an effective work and life balance.

### 5.5 Diversity Committee

Cromwell has a Diversity and Inclusion Committee made up of representatives from various departments and employee levels across the business. The mission of the Diversity and Inclusion Committee is to support the execution of the Diversity and Inclusion Strategy, advocate for and champion cultural change that promotes greater diversity and an inclusive organisational 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.

The Board will adopt (on recommendation from the Nomination and Remuneration 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.

### 5.6 Reporting progress

We are continually measuring progress and reporting back to our People, our Board and to our securityholders (via the Corporate Governance Statement).

## **6. Review**

---

The Board reviews the Policy annually and last reviewed in April 2022.