



cutting through complexity



ASX
COMPLIANCE

ASX Corporate Governance Council Principles and Recommendations on Diversity:

Analysis of 31 December 2011
year end disclosures

kpmg.com.au





Contents

1	Executive summary	2
2	Introduction	4
3	Methodology	6
4	Disclaimer	7
4.1	Inherent limitations	7
4.2	Third party reliance	7
5	Diversity policy and reporting	8
5.1	Establishing a diversity policy	8
5.2	“If not, why not?”	10
5.2.1	Policy disclosure: sector analysis	11
5.2.2	Policy disclosure: impact of entity size	12
5.3	Measurable objectives for achieving gender diversity	13
5.3.1	Measuring achievement of gender diversity	14
5.3.2	Beyond gender diversity	14
5.3.3	Measurable objectives: sector analysis	15
5.3.4	Measurable objectives: impact of entity size	16
5.4	Recognising the benefits of diversity	17
5.5	Diversity initiatives/practices in action	18
5.6	Made available to the public	19
6	Gender diversity	20
6.1	Disclosure on the proportion of women	20
6.2	Sector analysis	22
7	Disclosure against non-mandatory commentary	24
7.1	Board selection	24
7.2	Remuneration	25
A	Appendix 1	26
A.1	31 December year-end entities	27
A.2	ASX 10 listed entities	34
A.3	Global Industry Classification Standard (GICS)	35
A.4	Market capitalisation	35
B	Appendix 2	36
B.1	Basis of analysis	37

1 Executive summary



In June 2010, the ASX Corporate Governance Council (CGC) released changes to its Corporate Governance Principles and Recommendations (Recommendations) which introduced recommendations relating to diversity. The changes, applicable to ASX listed entities, took effect for financial years beginning on or after 1 January 2011.

This report provides an analysis of the disclosures made in relation to the diversity Recommendations by listed entities with a 31 December year end together with a review of the diversity practices adopted within the ASX Top 10 listed companies (ASX10). In addition to measuring compliance with the requirement to “if not, why not” reporting against the diversity Recommendations, this report describes:

- the activities listed entities are undertaking in the pursuit of diversity in their organisations
- the reasoning behind their efforts in the area of diversity
- whether entities are taking up some of the suggestions in the Commentary to the Recommendations – against which reporting is not mandatory.

The ASX Education and Research Program commissioned this research to assist listed entities to plan and implement their diversity activities and reporting with the benefit of knowing what their peers have done and to inform the broader community of the impact of the diversity Recommendations on listed entity behaviour in respect to diversity.

Our key findings from this analysis are as follows:

Diversity policies

- The majority of entities within the sample reported they have established diversity policies which generally stretch well beyond gender.
- The financial and energy sectors achieved the highest percentage of entities reporting the establishment of diversity policies on a sector basis.
- There is a direct correlation between the size of an entity and the likelihood a diversity policy has been established.

Measurable objectives

- More than half of the entities that had a diversity policy also reported measurable objectives for achieving gender diversity.
- The majority of entities setting measurable objectives reported they set targets to achieve female participation at different levels of the organisation.

- There was evidence of less specific objectives that may prove difficult to measure over time.
- Entities may benefit from further guidance from the CGC on the meaning, and setting of ‘measurable objectives’.

Gender diversity

- The majority of entities have reported statistics for women on the board, at the senior executive level and throughout the whole organisation.
- Some entities do not provide a clear definition of the ‘employee groups’ in respect of which they have disclosed gender data. It would benefit their reporting and enable better understanding by stakeholders if entities provided a clear definition of the ‘employee groups’ in respect of which they are reporting female participation.

Board selection processes and remuneration reviews

- While there was no requirement to report on board selection processes, some disclosure by entities was evidenced in response to the commentary in the Recommendations about the desirability of greater transparency in board selection and appointment processes.
- Some entities also provided information about remuneration audits in response to the guidance around the item in the commentary to Recommendation 8.1.

2 Introduction



On 30 June 2010, the CGC released changes to its Recommendations introducing recommendations relating to diversity. The 31 December 2011 annual reports are the first to include disclosures on the revised Recommendations. However, early adoption of the changes was encouraged by the CGC.

Australia was one of the first OECD countries to provide a structured protocol for reporting on diversity and for the first time, listed entities are formally required to either report their diversity initiatives to the public or state the reason why no disclosure has been made.

The diversity amendments to the CGC Recommendations, which followed the Corporations and Markets Advisory Committee's (CAMAC) March 2009 Diversity on Boards of Directors Report, was prompted by corporate Australia's record on diversity, international developments and studies demonstrating that diversity can help drive competitiveness.

The intention of the CGC is that entities embrace the spirit of the Recommendations in driving a culture-change in their organisations, rather than adopting a 'tick the box' compliance approach.

This report provides an analysis of reporting by listed entities with a 31 December 2011 year end. We also reviewed the diversity practices reported by the ASX 10 where the majority of the entities have had clear diversity strategies in place for some time and are 'early adopters' of the changes.



To summarise, the diversity Recommendations are:

Recommendation	Entity must report against on an “if not why not” basis
3.2	<ul style="list-style-type: none"> - Establish a diversity policy - Disclose the diversity policy or a summary of that policy - Include in the diversity policy requirements for the board to establish and annually assess measurable objectives and the progress towards achieving them - Set measurable objectives for achieving gender diversity
3.3	<ul style="list-style-type: none"> - Disclose in each annual report the measurable objectives for achieving gender diversity and progress towards achieving them
3.4	<ul style="list-style-type: none"> - Disclose in each annual report the proportion of women employees in the organisation, women in senior executive positions and women on the board
3.5	<ul style="list-style-type: none"> - Disclose in the corporate governance statement of the annual report an explanation of any departure from the Recommendations - Diversity policy should be made publicly available, ideally by posting the diversity policy or a summary of it on the entity’s website
2.6	<ul style="list-style-type: none"> - Disclose in the corporate governance statement of the annual report a statement as to the mix of skills and diversity which the board is looking to achieve in its membership

Commentary to recommendation	No requirement to report
2.4	<p>Encourage listed entities to provide greater transparency around board processes in searching for and selecting new board directors, including:</p> <ul style="list-style-type: none"> - Whether the entity has a skills matrix - The process to identify and select board candidates, including whether professional intermediaries are used to identify and/or assess candidates - The steps taken to ensure that a diverse range of candidates is considered - The factors taken into account in the selection process
8.1	<ul style="list-style-type: none"> - Encourage listed entities to disclose that the remuneration committee considered remuneration by gender



3 Methodology

This report examines the level of disclosure under the Recommendations for listed entities with a 31 December year end.

211 of the 237 listed entities with a 31 December year end (all entities that had lodged 2011 annual reports as at 30 April 2012) were reviewed. Delisted or suspended entities, foreign exempt entities and debt issuers were excluded from the review. A list of the entities that were reviewed is set out in Appendix 1.

The approach used in the review was to examine each entity's annual report and other sources (where appropriate) to determine an entity's compliance with each diversity Recommendation. The basis and measurement for our analysis is set out at Appendix 2.

We also examined our findings by reference to:

- Global Industry Classification Standard (GICS) sector
- Market capitalisation (as at 30 March 2012)

Please refer to Appendix 1 for a breakdown of the various groups (i.e. sector/size) of listed entities reviewed.

We also reviewed the diversity practices adopted by the ASX 10 (refer to Appendix 1 for the relevant companies as at 30 March 2012). Please note the ASX 10 disclosure results are only included for those entities with a 31 December year end.

Interviews were also conducted with a number of senior directors of listed entities and governance officers of institutional investors to obtain their views on implementing diversity initiatives and reporting against the diversity Recommendations.

4 Disclaimer



4.1 Inherent limitations

This report has been prepared as outlined in KPMG's engagement with ASX. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently no opinions or conclusions intended to convey assurance have been expressed.

The findings in this report are based on a qualitative study and the reported results reflect a perception of KPMG but only to the extent of the sample surveyed, being ASX listed entities.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by the interviewees consulted as part of the process.

KPMG has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events

occurring after the report has been issued in final form.

The findings in this report have been formed on the above basis.

4.2 Third party reliance

This report has been prepared at the request of the ASX Education and Research Program in accordance with the terms of its engagement with KPMG. Other than our responsibility to ASX neither KPMG nor any member or employee of KPMG undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that third party's sole responsibility.

5 Diversity policy and reporting

5.1 Establishing a diversity policy

Recommendation 3.2

Entities should establish a diversity policy and disclose the policy or a summary of that policy.

The policy should include requirements for the board to establish measurable objectives for achieving gender diversity and for the board to assess annually both the objectives and progress in achieving them.

KPMG comments

Now there is an established framework for entities to report on diversity, stakeholders can easily ascertain if diversity has been addressed by the board and if it is a part of the entity's strategy.

Although many entities would already have diversity policies in place, the Recommendations provide a standard approach to communicate their focus on diversity and its priority within the entity.

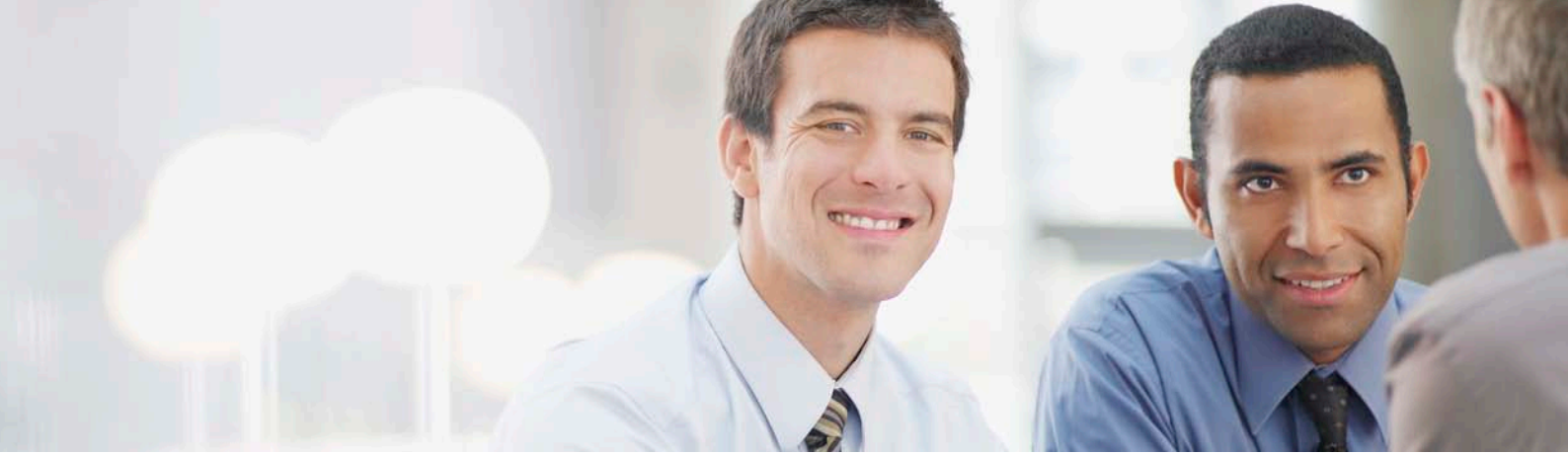
The data shows that the majority of entities in the sample reported they have established diversity policies, with the majority of those policies covering much more than just gender.

The financial services and energy sectors had the highest level of disclosure of diversity policies of all the sectors reviewed. Representation of both sectors in the samples was from across the spread of the ASX so this result was not influenced by entity size.

Given the sample sizes and the timing of the review it is perhaps too early in the reporting year to place too much emphasis on these results in relation to sector. Certainly these two sectors have felt the impact of skills shortages and may potentially recognise the benefits of implementing diversity policies in their organisations.

The data showed there is a direct correlation between the size of an entity and the likelihood they have adopted a diversity policy.

In instances where smaller entities had not adopted a diversity policy, this was mainly due to their size, scale of operations and/or availability of resources which made it more difficult for these entities to focus on certain aspects of corporate governance.

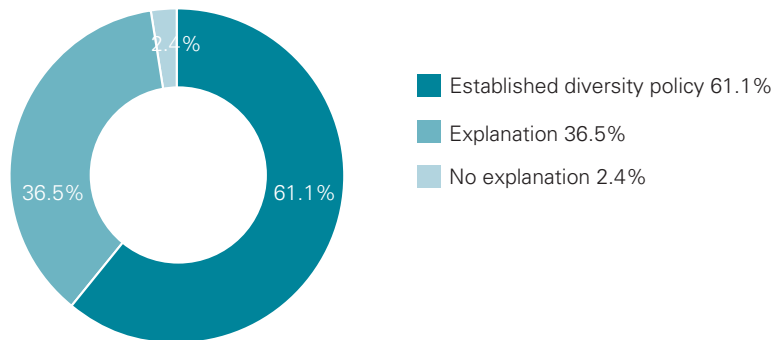


From the sample of 211 entities, 206 entities (98%) reported that they had either established a diversity policy or for those that had not, provided an explanation as to why not¹.

- 125 entities (59%) disclosed that they had established a diversity policy². An additional four entities (2%) reported this through an ASX announcement³.

- 60 entities (28%) included an explanation in the corporate governance statement of their annual report as to why they had not established a diversity policy. An additional 17 entities (8%) reported their explanation through an ASX announcement as to why they had not established a diversity policy.

Diversity policy reporting



Of the 129 entities that reported they had established a diversity policy, 124 entities (96%) disclosed the policy or a summary of that policy.

Diversity is broadly defined in the commentary to Recommendation 3.2 as including, but not limited to “gender, age, ethnicity and cultural background”. This is reflected in the diversity policies currently in place at various entities within the ASX. The vast majority that reported do not solely concentrate on gender and, in fact, go beyond what is suggested in the commentary to the Recommendations.

- Of the 129 entities that reported they had established a diversity policy, 114 entities (88%) disclosed that it covered more than gender.

Aside from gender, some of the additional groups that entities have incorporated in their definition of diversity include age, ethnicity, religious beliefs, cultural background, disability, sexual orientation, marital status, language, experience, physical ability, education and political beliefs.

Recommendation 3.2 states that the diversity policy should include requirements for the board to establish and annually assess objectives and the progress towards achieving them.

- Of the 129 entities that reported they had established a diversity policy, 87 (67%) disclosed they had requirements for the board to establish and annually assess the objectives and the progress of achieving them.

¹ The outstanding 2% of entities included one which has since delisted, one about to undertake a corporate transformation (“backdoor listing”) and three who were allowed to rectify after the date of the report.

² Entities reported this through their annual reports and/or on their websites.

³ The reporting by way of ASX announcement, in the majority of cases, resulted from follow-up action by ASX Compliance after the release of the entity’s annual report.

5.2 “If not, why not?”

In recognition some of the Recommendations may not be appropriate to every entity’s circumstances, the CGC provides entities with the opportunity to adopt alternative governance practices provided they explain why.

The “if not, why not” approach ensures entities do not disregard the Recommendations since they must explain their reasons for not adopting a Recommendation to stakeholders.

Overall, the majority of entities that did not disclose a diversity policy adopted the “if not, why not” approach and provided an explanation as to why.

Common “if not, why not” explanations provided by entities included:

- Informal processes are already in place for monitoring diversity or the entity had established an informal policy
- The entity is in the process of developing a diversity policy
- Impractical/unnecessary to establish a diversity policy due to the entity’s size, stage of development and nature of operations.

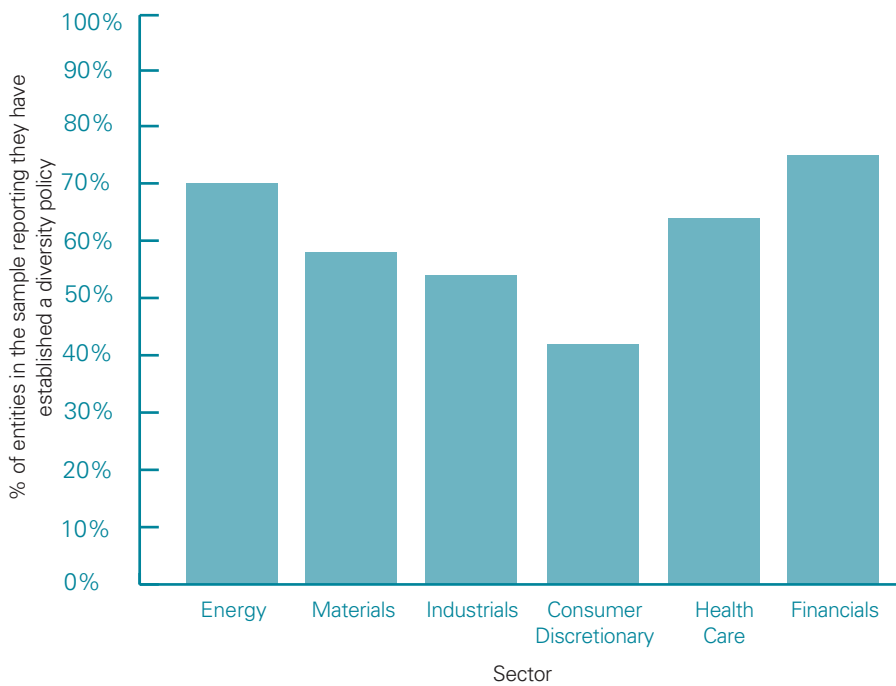
⁴ Please note that we included in our analysis only the GICS sectors which had 8 or more entities. As a result, entities from the following GICS sectors: Consumer Staples, Information Technology, Telecommunication Services, Utilities were not included in our analysis.

5.2.1 Policy disclosure: sector analysis

The analysis below shows, by sector, how entities have dealt with the diversity requirements. Entities have been classified into sectors by applying the Global Industry Classification Standard (GICS)⁴.

GICS	Sample size	Entities reporting diversity policy established ⁵	
		Number	%
Energy	33	23	70%
Materials	88	52	59%
Industrials	20	11	55%
Consumer Discretionary	19	8	42%
Health Care	14	9	64%
Financials	21	16	76%

Sector: Diversity policy disclosure



⁵ Includes entities that reported through ASX announcements.

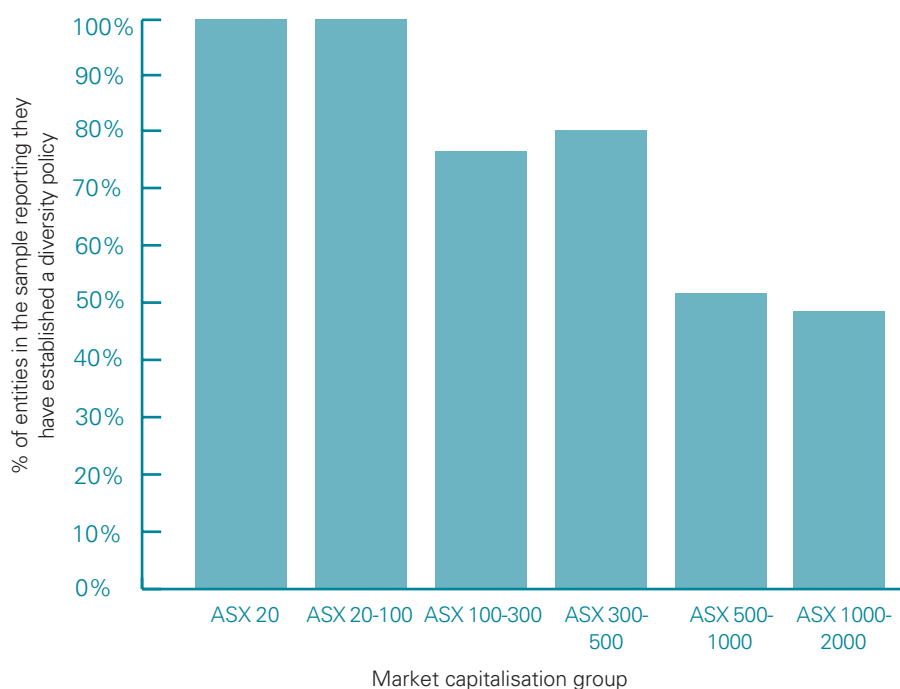
5.2.2 Policy disclosure: impact of entity size

Our review found there is a positive correlation between entity size and the level of disclosure.

Below is an analysis of how different sized entities have dealt with the diversity Recommendations. Entities were grouped according to their market capitalisation as at 30 March 2012.

Market capitalisation	Sample size	Entities reporting diversity policy established ⁶	
		Number	%
ASX 20	4	4	100%
ASX 20-100	11	11	100%
ASX 100-300	34	26	76%
ASX 300-500	25	20	80%
ASX 500-1000	57	29	51%
ASX 1000-2200	80	39	49%

Entity size: Diversity policy disclosure



⁶ Includes entities that reported through ASX announcements.

5.3 Measurable objectives for achieving gender diversity

Recommendations 3.2 and 3.3

Entities should establish measurable objectives for achieving gender diversity and disclose the objectives in the annual report along with the entity's progress towards achieving the objectives.

KPMG comments

Establishment of measurable objectives is recommended to assist entities in transforming their diversity strategies and goals into achievable outcomes.

Overall, the number of entities, across most sectors and the spread of the ASX, reporting that they have set measurable objectives is encouraging.

The majority of entities have set targets for the number of women to be employed at specific levels of management and at board level consistent with the example provided in the commentary to the Recommendations. Consideration should be given to whether it was the intention of the CGC that all entities have numerical targets or is it appropriate to set objectives relating to implementation of initiatives.

Some entities have chosen measures relating to diversity initiatives or have simply disclosed broader, aspirational statements without disclosing how achievement of these would be measured over time. For example:

- Create development opportunities for men and women that develop skills and experience for advancement
- Provide flexible workplace arrangements
- Provide employment opportunities for people with disabilities
- Promote an inclusive culture
- Review gender gaps

There will be a challenge for entities to make these objectives measurable and demonstrate to stakeholders clear progress against them over time. Further guidance from the CGC on what constitutes a "measurable objective" may assist entities in setting more definitive measures.

Although the Recommendation relates to setting measurable objectives to achieve gender diversity, several entities have set diversity objectives beyond gender, indicating that these entities are not simply complying with requirements but giving consideration to the specific diversity issues facing their business. The robustness of objectives set will become clear in the next reporting season when entities will be required to report progress of achievement against them.

5.3.1 Measuring achievement of gender diversity

- Of the 129 entities reporting a diversity policy, 76 entities (59%) reported they had established measurable objectives for achieving gender diversity.
- Of the 76 entities reporting they had established measurable objectives, 58 entities (76%) disclosed the details of their measurable objectives for achieving gender diversity.

The majority of entities reported they had set measurable objectives using specific targets aimed at maintaining or improving the participation of women at different levels of the organisation. For example:

- To increase the representation of women employees in the whole organisation to x% over x years.
- To increase the number of women in middle management positions to x% by 201x.
- To increase the number of women in senior executive positions to x% by 201x.
- To achieve an x% target of female representation on the Board.

Other notable measurable objectives directed towards achieving gender diversity include:

- Review of gender remuneration parity to be undertaken on an annual basis.
- Potential candidates for vacant positions must include at least one female candidate.
- During the board selection process, the professional consultant assisting the board must provide at least one credible and suitably experienced female candidate.
- In interviews for executive positions, there needs to be at least one appropriately qualified female candidate and at least one female on the interview panel.

Common “if not, why not” explanations provided by entities included:

- Due to the size of the entity and its workforce the Board does not consider it appropriate to set measurable objectives at this time.
- Due to the stage of development that the entity is in the Board does not consider it appropriate to include measurable objectives at this time.
- Due to the nature of the entity’s operations the Board has not established measurable objectives.
- Intends to establish measurable objectives in the near future.

As this is the first year the Recommendations apply to listed entities with a 31 December year end, we have not included in the report an analysis of entities’ disclosure in relation to their progress in achieving their measurable objectives.

5.3.2 Beyond gender diversity

Examples of measurable objectives reported that went beyond gender diversity:

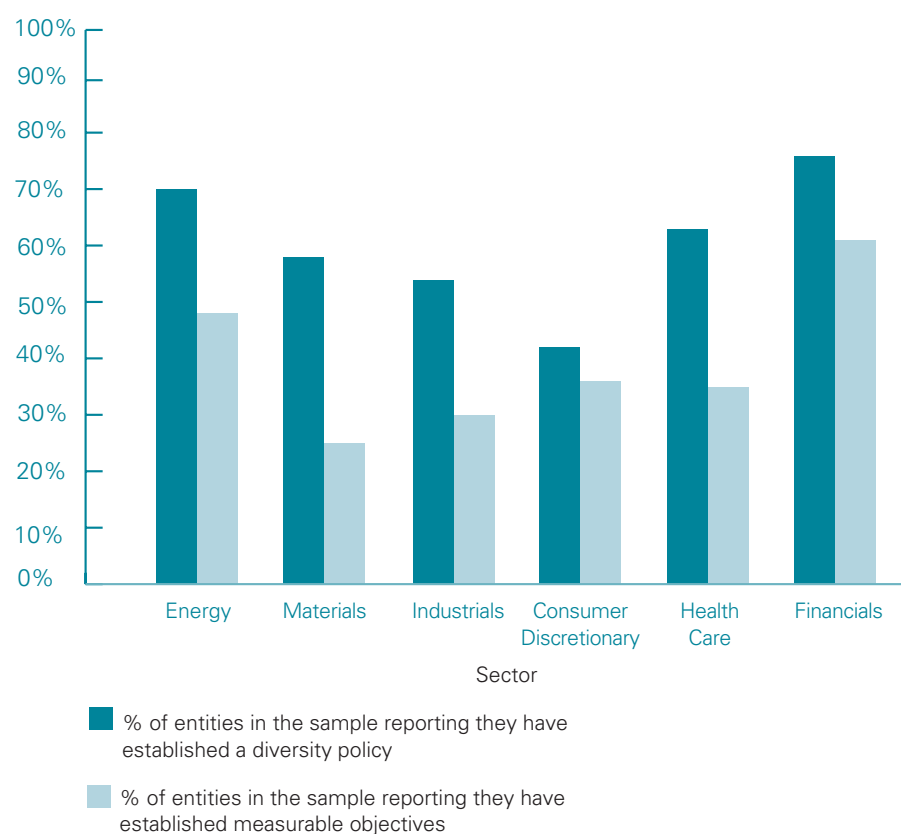
- To provide x positions to people from disadvantaged backgrounds and support their advancement through mentoring and cultural awareness programs.
- To achieve an x% of indigenous employees in the workforce by end of x period.
- To develop and implement an approach to managing and improving age diversity.
- Provide employment assistance and opportunities to indigenous Australians.
- Provide disability employment opportunities.

5.3.3 Measurable objectives: sector analysis

Below is an analysis by sector of the percentage of entities that have established diversity policies and out of those entities, the percentage that have established measurable objectives⁷.

GICS	Sample size	Entities reporting diversity policy established ⁸		Entities reporting measurable objectives established ⁹	
		Number	%	Number	% ¹⁰
Energy	33	23	70%	16	70%
Materials	88	52	59%	23	44%
Industrials	20	11	55%	6	55%
Consumer Discretionary	19	8	42%	7	88%
Health Care	14	9	64%	5	56%
Financials	21	16	76%	13	81%

Sector: Measurable objectives



⁷ Only the GICS sectors which had eight or more entities are included in our analysis. As a result, entities from the following GICS sectors: Consumer Staples, Information Technology, Telecommunication Services, Utilities were not included in our analysis.

⁸ Includes entities that reported through ASX announcements.

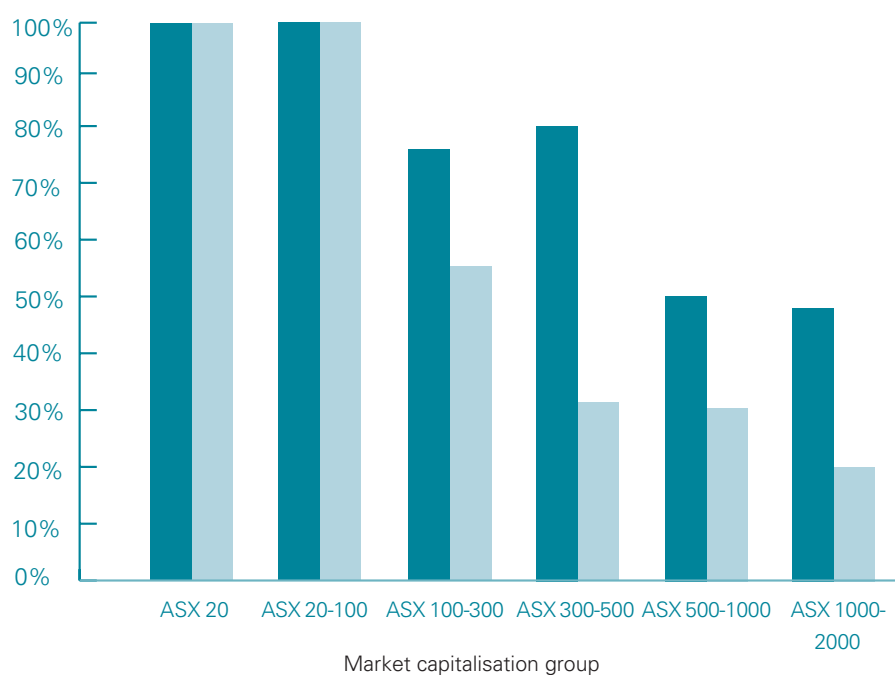
⁹ Includes entities that reported through ASX announcements.

¹⁰ Of the entities that reported they had established a diversity policy, the percentage of entities that reported they had established measurable objectives.

5.3.4 Measurable objectives: impact of entity size

Market capitalisation	Sample size	Entities reporting diversity policy established ¹¹		Entities reporting measurable objectives established ¹²	
		Number	%	Number	%
ASX 20	4	4	100%	4	100%
ASX 20-100	11	11	100%	11	100%
ASX 100-300	34	26	76%	19	73%
ASX 300-500	25	20	80%	8	40%
ASX 500-1000	57	29	51%	18	62%
ASX 1000-2200	80	39	49%	16	41%

Entity size: measurable objectives



■ % of entities in the sample reporting they have established a diversity policy

■ % of entities in the sample reporting they have established measurable objectives

¹¹ Includes entities that reported through ASX announcements.

¹² Includes entities that reported through ASX announcements.

5.4 Recognising the benefits of diversity

KPMG comments

Studies have demonstrated the potential financial benefits related to the implementation of diversity initiatives¹⁴. The comments expressed by reporting entities reflect the perspective that diversity adds value to an entity's bottom line, improves an entity's overall image as well as having a positive effect on both internal and external stakeholders. For instance, early adopters have recognised:

- the social and commercial value that diversity brings to an entity
- the importance of diversity in allowing an entity to develop quality solutions to challenges
- the ability for diversity to create sustainable value for the entity and its stakeholders
- a diverse and inclusive workforce benefits employees as well as the business

The CGC has acknowledged through the commentary to the Recommendations that entities benefit from diversity at all levels, whether it is at the board, senior executive or organisational level.

Our analysis has shown that entities have highlighted the following as some of the benefits resulting from a diverse workforce:

- Commitment to diversity creates a competitive advantage and improves entity performance.
- Maximises achievement of an entity's vision and goals in the future.
- Access to different perspectives and ideas.

- Improves an entity's responsiveness to the diverse needs of various stakeholders such as employees, shareholders, customers.
- Results in a high performing workforce and maximises opportunities to attract, retain and develop the very best talent.
- Fosters greater innovation and promotes better problem solving.
- Better reflects the communities in which we operate.

The single biggest benefit and the fundamental thing that drives this, is creating the deepest possible talent pool.¹³

¹³ Neil Hamilton, OzMinerals Chairman

¹⁴ For example The Bottom Line: Corporate Performance and Women's Representation on Boards, Catalyst, October 2007 McKinsey "Women Matter: Gender diversity, a corporate performance driver" (2007)

5.5 Diversity initiatives/practices in action

KPMG comments

Although entities are not required to disclose their diversity initiatives/practices, this information can provide stakeholders with an understanding of the action they are taking. Entities, yet to report, can learn from what strategies other entities are implementing.

Examples of initiatives that entities have implemented are discussed below. From current commentary and our discussions with directors, it was clear the impetus must come from the CEO and executive team¹⁵.

Commentators, investors and directors are also clear that entities should be concentrating on the pipeline of women coming through the organisation rather than simply looking at the gender representation at the top levels. Entities should be looking at recruitment practices to ensure they consider the widest possible pool of candidates and provide flexible working practices and the appropriate mentoring and support to ensure they can recruit and retain women at the right levels.

Examples of diversity practices that entities have introduced include:

- Diversity committee/council
- Flexible workplace arrangements
- Unconscious bias training programs
- Diversity audit
- Gender based analysis of remuneration.

Examples of the diversity practices that early adopters have put in place include:

- Diversity champions network to share best practice across the entity.
- Formalisation of the remuneration committee's responsibility to review remuneration by gender.

- Unconscious bias training programs to reduce the impact of unconscious bias in decision-making situations such as recruitment.
- Mentoring program for high potential female board candidates.
- Disability action plan outlining the entity's strategy for assisting employees and clients with disability.
- Indigenous employment strategy to improve employment equity for Indigenous Australians.

¹⁵ "Our experiences in elevating the representation of women in leadership - A letter from business leaders" - October 2011

5.6 Made available to the public

Recommendation 3.5

Entities should make the diversity policy or a summary of that policy publicly available, ideally by posting it to the entity's website in a clearly marked corporate governance section.

KPMG comments

The majority of entities with a diversity policy in place complied with this Recommendation, with 96% disclosing the policy or a summary of the policy.

Of the 129 entities reporting a diversity policy, 124 entities (96%) disclosed the policy or a summary of the policy. 84 entities (65%) posted the policy or a summary of it on their website.

6 Gender diversity



6.1 Disclosure on the proportion of women

Recommendation 3.4

Entities should disclose in each annual report the proportion of:

- women employees in the whole organisation
- women in senior executive positions
- women on the board.

KPMG comments

The majority of entities have disclosed in their annual reports the proportion of women employees at different levels of the organisation. A review by sector showed that entities in the financial industry exhibited the highest level of disclosure overall.

We understand anecdotally that entities have had difficulties determining definitions for the data groups and different entities' approaches to disclosing the numbers is not always clear. Some entities have very broadly defined "senior executives", while others have restricted this level to their Key Management Personnel. Entities that have disclosed numbers at all levels throughout the organisation should be commended for their open approach.

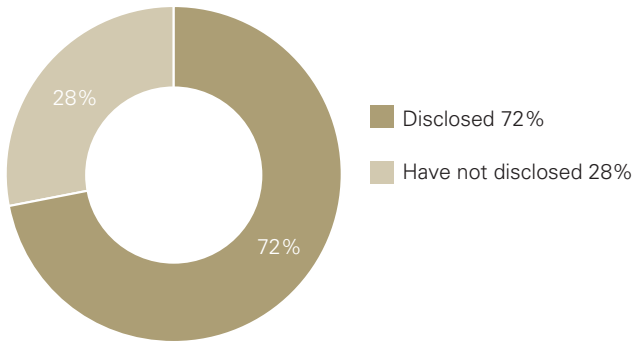
The commentary to Recommendation 3.4 leaves it open to individual entities to determine how best to report "an accurate and not misleading impression of relative participation of women and men in the workplace". However, entities should be encouraged to provide clear definitions and explanations of the groups in respect of which they have provided data. For example, it should be clear if data is provided for full-time equivalent or number of full and part-time employees.

Given the ongoing discussion surrounding the importance of the pipeline of female talent, further consideration may be given to the importance of looking at the statistics for middle management. Although, as with "senior executives" there would be difficulties with standard definitions.

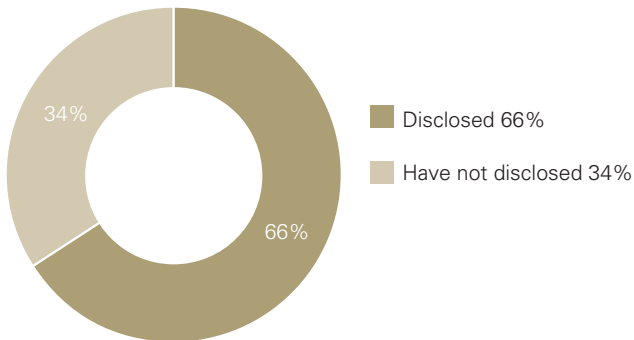
- 135 entities (64%) disclosed in their annual reports the proportion of women employees in the whole organisation. An additional 16 entities (8%) disclosed this through an ASX announcement.
 - the average percentage of women employees in the whole organisation was 31%.
- 125 entities (59%) disclosed in their annual reports the proportion of women in senior executive positions. An additional 14 entities (7%) disclosed this through an ASX announcement.
 - the average percentage of women in senior executive positions was 18%.
- 140 entities (66%) disclosed in their annual reports the proportion of women on the board. An additional 16 entities (8%) disclosed this through an ASX announcement.
 - the average percentage of women on the board was 8%.



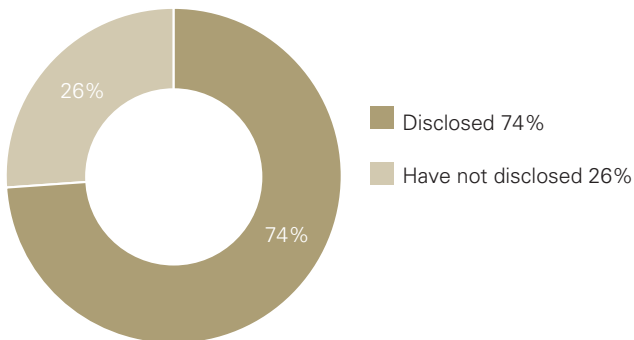
Disclosure of proportion of women in whole organisation



Disclosure of proportion of women in senior executive positions



Disclosure of proportion of women on board

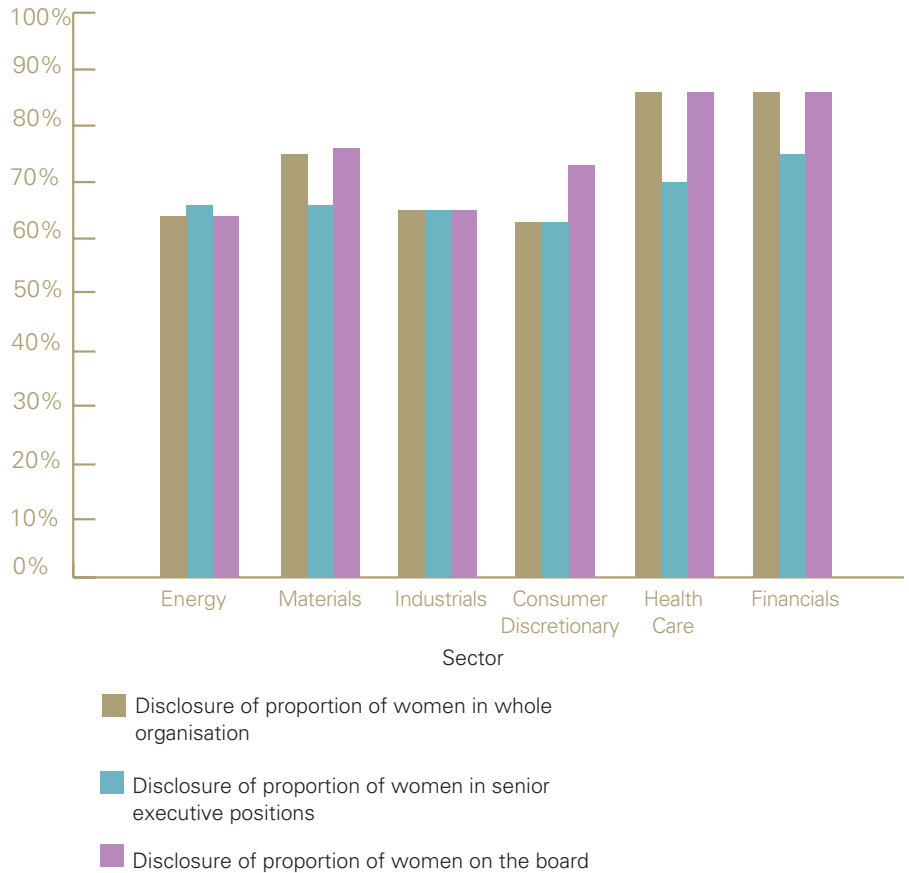


6.2 Sector analysis

Below is an analysis by sector of the entities that have disclosed in their annual report the proportion of women at different levels of the organisation.

Sector	Number of entities	Disclosure of proportion of women in whole organisation ¹⁷		Disclosure of proportion of women in senior executive positions ¹⁸		Disclosure of proportion of women on the board ¹⁹	
		Number	%	Number	%	Number	%
Energy	33	21	64%	22	67%	21	64%
Materials	88	66	75%	59	67%	67	76%
Industrials	20	13	65%	13	65%	13	65%
Consumer Discretionary	19	12	63%	12	63%	14	74%
Health Care	14	12	86%	10	71%	12	86%
Financials	21	18	86%	16	76%	18	86%

Sector: Gender diversity disclosure



¹⁷ Includes entities that reported through ASX announcements.

¹⁸ Includes entities that reported through ASX announcements.

¹⁹ Includes entities that reported through ASX announcements.

The following table shows, by sector, the average percentage of women reported²⁰:

- in the whole organisation
- in senior executive positions
- on the board.

	Average percentage of women in whole organisation	Average percentage of women in senior executive positions	Average percentage of women on the board
Energy	32%	16%	6%
Materials	22%	13%	4%
Industrials	29%	12%	12%
Consumer Discretionary	40%	28%	9%
Health Care	43%	29%	14%
Financials	46%	29%	15%

²⁰ These figures use the definitions provided by the entities themselves.

7 Disclosure against non-mandatory commentary

7.1 Board selection

Commentary to Recommendation 2.4

The non-mandatory commentary to Recommendation 2.4 (the board should establish a Nominations Committee) also encourages greater transparency in board selection and appointment process.

In addition, Recommendation 2.6 requires entities to disclose in their corporate governance statement the mix of skills and diversity which the board is looking to achieve in its membership.

KPMG comments

Our review has shown there is limited disclosure on the board processes used in searching for and selecting new board directors. The majority of entities have provided a lower level of transparency than suggested in the commentary to Recommendation 2.4 which is referable to the fact it is not a requirement to report against the commentary.

From our review of Recommendation 2.6, less than half of the entities disclosed a statement of the board mix of skills and diversity in the corporate governance statement in the annual report.

However, a high level of compliance with this Recommendation was evidenced in the ASX 10 entities.

- 148 entities (70%) disclosed that they had a board skills matrix.
- 103 entities (49%) disclosed a process by which their board candidates are identified and selected.
- 91 entities (43%) disclosed that they used a professional intermediary to identify and/or assess candidates.
- 63 entities (30%) disclosed that they had taken steps to ensure that a diverse range of candidates is considered.
- 71 entities (34%) disclosed the factors that they take into account in the selection process.
- Overall, 88 entities (42%) had a medium to high level of transparency in relation to the processes adopted in searching for and selecting directors to the board²¹.
- 85 entities (40%) disclosed a statement as to the mix of skills and diversity.

²¹ Whether an entity has a low, medium or high level of transparency was determined as follows:

- Entities that had less than three of the factors with only general statements being made were regarded as having a low level of transparency;
- Entities that had three to five factors with only general statements being made were regarded as having a medium level of transparency;
- Entities that had all five factors and further elaborated on the factors were regarded as having a high level of transparency.



7.2 Remuneration

Commentary to Recommendation 8.1

The commentary to Recommendation 8.1 encourages entities to disclose whether remuneration by gender has been considered in the remuneration committee's review and recommendations to the board.

KPMG comments

We were not able to identify a high level of disclosure against this recommendation although we do note that some organisations had set measurable objectives relating to consideration of remuneration by gender.

From our discussions with directors, we understand this is now a very common remuneration committee agenda item. Where this is the case, entities would benefit by making this clear in their disclosure.

21 entities (10%) disclosed that their remuneration committee considered remuneration by gender in the annual report or diversity area of their website.

A Appendix 1



A.1 31 December year-end entities

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
1	AAC	Australian Agricultural Company Limited	Consumer Staples	408	ASX 101 - 300
2	AAX	Ausenco Limited	Industrials	534	ASX 101 - 300
3	ABC	Adelaide Brighton Limited	Materials	1,845	ASX 101 - 300
4	ABZ	Australian Bauxite Limited	Materials	50	ASX 501 - 1000
5	AFT	AFT Corporation Limited	Industrials	7	ASX 1001 - 2200
6	AGF	AMP Capital China Growth Fund	Financials	231	ASX 301 - 500
7	AGY	Argosy Minerals Limited	Materials	10	ASX 1001 - 2200
8	AIQ	Alternative Investment Trust	Financials	68	ASX 501 - 1000
9	AKP	Audio Pixel Holdings Limited	Consumer Discretionary	140	ASX 501 - 1000
10	ALK	Alkane Resources Ltd	Materials	493	ASX 101 - 300
11	ALL	Aristocrat Leisure Limited	Consumer Discretionary	1,640	ASX 101 - 300
12	ALZ	Australand Property Group	Financials	1,477	ASX 101 - 300
13	AMB	Ambition Group Limited	Industrials	12	ASX 1001 - 2200
14	AMP	AMP Limited	Financials	12,332	ASX 21 - 100
15	AOM	Australia Oriental Minerals NL	Materials	5	ASX 1001 - 2200
16	APE	AP Eagers Limited	Consumer Discretionary	421	ASX 101 - 300
17	APN	APN News and Media Limited	Consumer Discretionary	570	ASX 101 - 300
18	ARX	Arc Exploration Limited	Materials	6	ASX 1001 - 2200
19	ATP	Atlas South Sea Pearl Limited	Consumer Discretionary	13	ASX 1001 - 2200
20	ATV	Atlantic Gold NL	Materials	19	ASX 1001 - 2200
21	AUT	Aurora Oil & Gas Limited	Energy	1,556	ASX 101 - 300
22	AWC	Alumina Limited	Materials	3,014	ASX 21 - 100
23	AZZ	Antares Energy Limited	Energy	130	ASX 501 - 1000
24	BBL	Brisbane Broncos Limited	Consumer Discretionary	26	ASX 1001 - 2200
25	BDR	Beadell Resources Limited	Materials	483	ASX 101 - 300
26	BFG	Bell Financial Group Limited	Financials	141	ASX 501 - 1000

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
27	BLY	Boart Longyear Limited	Industrials	1,918	ASX 101 - 300
28	BOC	Bougainville Copper Limited	Materials	303	ASX 301 - 500
29	BUG	Buderim Ginger Limited	Consumer Staples	13	ASX 1001 - 2200
30	BZL	Braziron Limited	Materials	7	ASX 1001 - 2200
31	CAA	Capral Limited	Materials	66	ASX 501 - 1000
32	CCL	Coca-Cola Amatil Limited	Consumer Staples	9,472	ASX 21 - 100
33	CDH	Chongherr Investments Ltd	Materials	1	ASX 1001 - 2200
34	CGT	Castlemaine Goldfields Limited	Materials	26	ASX 1001 - 2200
35	CIX	Calliden Group Limited	Financials	26	ASX 1001 - 2200
36	CLY	Clancy Exploration Limited	Materials	7	ASX 1001 - 2200
37	CRM	Carbon Minerals Limited	Energy	31	ASX 501 - 1000
38	CTX	Caltex Australia Limited	Energy	3,750	ASX 21 - 100
39	CUX	Crossland Uranium Mines Limited	Energy	10	ASX 1001 - 2200
40	CYC	Cyclopharm Limited	Health Care	8	ASX 1001 - 2200
41	DRA	Dragon Mining Limited	Materials	84	ASX 501 - 1000
42	DRX	Diatreme Resources Limited	Materials	24	ASX 1001 - 2200
43	EAU	Eldorado Gold Corporation	Materials	116	ASX 501 - 1000
44	EEG	Empire Energy Group Limited	Energy	66	ASX 501 - 1000
45	EMM	Electrometals Technologies Limited	Industrials	6	ASX 1001 - 2200
46	EOS	Electro Optic Systems Holdings Limited	Industrials	33	ASX 501 - 1000
47	EPY	E-pay Asia Limited	Information Technology	14	ASX 1001 - 2200
48	ERA	Energy Resources of Australia Limited	Energy	668	ASX 101 - 300
49	ERJ	Enerji Ltd	Utilities	10	ASX 1001 - 2200
50	FAR	Far Limited	Energy	103	ASX 501 - 1000
51	FND	Finders Resources Limited	Materials	114	ASX 501 - 1000
52	GDA	Gondwana Resources Limited	Materials	2	ASX 1001 - 2200
53	GDO	Gold One International Limited	Materials	679	ASX 101 - 300
54	GEM	G8 Education Limited	Consumer Discretionary	180	ASX 301 - 500
55	GEN	Genesis Research & Development Corporation Limited	Health Care	1	ASX 1001 - 2200
56	GGG	Greenland Minerals and Energy Limited	Materials	187	ASX 301 - 500

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
57	GID	GI Dynamics, Inc	Health Care	291	ASX 301 - 500
58	GPG	Guinness Peat Group Plc	Consumer Discretionary	111	ASX 501 - 1000
59	GPT	GPT Group	Financials	5,634	ASX 21 - 100
60	GRR	Grange Resources Limited	Materials	768	ASX 101 - 300
61	GTR	GTI Resources Limited	Materials	2	ASX 1001 - 2200
62	GXY	Galaxy Resources Limited	Materials	286	ASX 301 - 500
63	HAR	Haranga Resources Limited	Materials	78	ASX 501 - 1000
64	HDF	Hastings Diversified Utilities Fund	Utilities	1,118	ASX 101 - 300
65	HGG	Henderson Group PLC	Financials	1,288	ASX 101 - 300
66	HGL	Hudson Investment Group Limited	Financials	23	ASX 1001 - 2200
67	HIG	Highlands Pacific Limited	Materials	120	ASX 501 - 1000
68	HOR	Horseshoe Metals Limited	Materials	15	ASX 1001 - 2200
69	HRS	Hudson Resources Limited	Materials	39	ASX 501 - 1000
70	HTA	Hutchison Telecommunications (Australia) Limited	Telecommunication Services	1,404	ASX 101 - 300
71	HYO	Hyro Limited	Consumer Discretionary	12	ASX 1001 - 2200
72	IAU	Intrepid Mines Limited	Materials	385	ASX 101 - 300
73	IDE	IDEAS International Limited	Information Technology	20	ASX 1001 - 2200
74	IFS	IFS Construction Services Ltd	Industrials	4	ASX 1001 - 2200
75	ILU	Iluka Resources Limited	Materials	7,449	ASX 21 - 100
76	IPP	Iproperty Group Limited	Consumer Discretionary	220	ASX 301 - 500
77	IRE	Iress Market Technology Limited	Information Technology	889	ASX 101 - 300
78	IRN	Indophil Resources NL	Materials	517	ASX 101 - 300
79	IVA	Ivanhoe Australia Limited	Materials	842	ASX 101 - 300
80	IVC	InvoCare Limited	Consumer Discretionary	881	ASX 101 - 300
81	KGD	Kula Gold Limited	Materials	89	ASX 501 - 1000
82	KPL	Kina Petroleum Limited	Energy	26	ASX 1001 - 2200
83	KTL	KTL Technologies Limited	Industrials	2	ASX 1001 - 2200
84	LDW	Ludowici Limited	Industrials	321	ASX 301 - 500
85	LEG	Legend Mining Limited	Materials	48	ASX 501 - 1000
86	LMR	Lemur Resources Limited	Energy	23	ASX 1001 - 2200
87	MBN	Mirabela Nickel Limited	Materials	278	ASX 301 - 500
88	MES	Mesbon China Nylon Limited	Consumer Discretionary	30	ASX 501 - 1000

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
89	MGU	Magnum Mining and Exploration Limited	Materials	9	ASX 1001 - 2200
90	MLB	Melbourne IT Limited	Information Technology	137	ASX 501 - 1000
91	MNC	Metminco Limited	Materials	254	ASX 301 - 500
92	MOD	MOD Resources Limited	Materials	59	ASX 501 - 1000
93	MOL	Moly Mines Limited	Materials	112	ASX 501 - 1000
94	MOY	Millennium Minerals Limited	Materials	66	ASX 501 - 1000
95	MQA	Macquarie Atlas Roads Group	Industrials	789	ASX 101 - 300
96	MSI	Multistack International Limited	Industrials	1	ASX 1001 - 2200
97	MST	Metal Storm Limited	Industrials	4	ASX 1001 - 2200
98	NDO	Nido Petroleum Limited	Energy	88	ASX 501 - 1000
99	NEU	Neuren Pharmaceuticals Limited	Health Care	28	ASX 501 - 1000
100	NFE	Northern Iron Limited	Materials	355	ASX 301 - 500
101	NGE	New Guinea Energy Limited	Energy	47	ASX 501 - 1000
102	NOE	Novarise Renewable Resources International Limited	Materials	77	ASX 501 - 1000
103	OGL	OGL Resources Limited	Energy	11	ASX 1001 - 2200
104	OSH	Oil Search Limited	Energy	9,236	ASX 21 - 100
105	OTI	Oriental Technologies Investment Limited	Industrials	3	ASX 1001 - 2200
106	OZL	OZ Minerals Limited	Materials	3,049	ASX 21 - 100
107	PEM	Perilya Limited	Materials	346	ASX 301 - 500
108	PGS	Planet Gas Limited	Energy	18	ASX 1001 - 2200
109	PHA	Public Holdings (Australia) Limited	Financials	1	ASX 1001 - 2200
110	PMR	Precious Metal Resources Limited	Materials	3	ASX 1001 - 2200
111	PNA	PanAust Limited	Materials	1,832	ASX 101 - 300
112	POH	Phosphagenics Limited	Health Care	239	ASX 301 - 500
113	PRE	Pacrim Energy Limited	Materials	8	ASX 1001 - 2200
114	PSA	Petsec Energy Limited	Energy	51	ASX 501 - 1000
115	PYM	Pryme Energy Limited	Energy	13	ASX 1001 - 2200
116	QBE	QBE Insurance Group Limited	Financials	16,403	ASX 20
117	RAF	Raffles Capital Limited	Financials	12	ASX 1001 - 2200
118	RCT	Reef Casino Trust	Consumer Discretionary	99	ASX 501 - 1000
119	RIO	Rio Tinto Limited	Materials	28,499	ASX 20
120	RIS	Richfield International Limited	Industrials	2	ASX 1001 - 2200

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
121	RKN	Reckon Limited	Information Technology	295	ASX 301 - 500
122	RNY	RNY Property Trust	Financials	37	ASX 501 - 1000
123	ROC	Roc Oil Company Limited	Energy	273	ASX 301 - 500
124	ROG	Red Sky Energy Limited	Energy	10	ASX 1001 - 2200
125	SAV	Savcor Group Limited	Industrials	7	ASX 1001 - 2200
126	SGN	STW Communications Group Limited	Consumer Discretionary	363	ASX 301 - 500
127	SKI	Spark Infrastructure Group	Utilities	1,983	ASX 101 - 300
128	SLT	Select Vaccines Limited	Health Care	3	ASX 1001 - 2200
129	SMC	Strategic Minerals Corporation NL	Materials	16	ASX 1001 - 2200
130	SOC	Sovereign Gold Company Limited	Materials	8	ASX 1001 - 2200
131	STO	Santos Limited	Energy	13,422	ASX 21 - 100
132	SWW	SWW Energy Limited	Energy	6	ASX 1001 - 2200
133	SYD	Sydney Airport	Industrials	5,342	ASX 21 - 100
134	TAP	Tap Oil Limited	Energy	212	ASX 301 - 500
135	TAW	Tawana Resources NL	Materials	37	ASX 501 - 1000
136	TCM	Tiaro Coal Limited	Energy	32	ASX 501 - 1000
137	TGS	Tiger Resources Limited	Materials	249	ASX 301 - 500
138	TIG	Tigers Realm Coal Limited	Materials	68	ASX 501 - 1000
139	TMM	Tasmania Mines Limited	Materials	29	ASX 501 - 1000
140	TPT	Tangiers Petroleum Limited	Energy	49	ASX 501 - 1000
141	TYO	Treyo Leisure And Entertainment Limited	Consumer Discretionary	104	ASX 501 - 1000
142	TZN	Terramin Australia Limited	Materials	36	ASX 501 - 1000
143	UBI	Universal Biosensors, Inc.	Health Care	118	ASX 501 - 1000
144	UOS	United Overseas Australia Limited	Financials	443	ASX 101 - 300
145	VGO	Vantage Goldfields Limited	Materials	44	ASX 501 - 1000
146	VII	Vietnam Industrial Investments Limited	Materials	36	ASX 501 - 1000
147	VSC	Vita Life Sciences Limited	Health Care	19	ASX 1001 - 2200
148	WDC	Westfield Group Limited	Financials	20,388	ASX 20
149	WPL	Woodside Petroleum Limited	Energy	28,045	ASX 20
150	WRG	Water Resources Group Limited	Utilities	23	ASX 1001 - 2200
151	WRT	Westfield Retail Trust	Financials	7,880	ASX 21 - 100
152	XST	Xstate Resources Limited	Energy	8	ASX 1001 - 2200

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$000,000)	Market capitalisation group as at 30.03.2012
153	XXL	XiaoXiao Education Limited	Consumer Discretionary	1	ASX 1001 - 2200
154	AAZ	Australand Assets Trust	Financials	254	ASX 301 - 500
155	ALD	Allied Gold Mining Plc	Materials	119	ASX 501 - 1000
156	AOK	Austex Oil Limited	Energy	45	ASX 501 - 1000
157	AQG	Alacer Gold Corp	Materials	742	ASX 101 - 300
158	AUN	Austar United Communications Limited	Consumer Discretionary	1,844	ASX 101 - 300
159	AVD	Advance Energy Limited	Energy	1	ASX 1001 - 2200
160	AZK	Aziana Limited	Materials	16	ASX 1001 - 2200
161	BAB	Bullabulling Gold Limited	Materials	92	ASX 501 - 1000
162	BHU	Beacon Hill Resources Plc	Materials	N/A ²²	ASX 501 - 1000
163	BSR	Bassari Resources Limited	Materials	26	ASX 1001 - 2200
164	CHP	Chapmans Limited	Financials	2	ASX 1001 - 2200
165	CNB	Cic Australia Limited	Financials	70	ASX 501 - 1000
166	CNS	Centius Gold Limited	Materials	1	ASX 1001 - 2200
167	COM	Comops Limited	Information Technology	6	ASX 1001 - 2200
168	CRB	Carbine Resources Limited	Materials	17	ASX 1001 - 2200
169	CVR	Central Asia Resources Limited	Materials	25	ASX 1001 - 2200
170	DTG	Daton Group Australia Ltd	Materials	17	ASX 1001 - 2200
171	EIM	EI Corporation Limited	Industrials	5	ASX 1001 - 2200
172	ELM	Elemental Minerals Limited	Materials	286	ASX 301 - 500
173	EME	Energy Metals Ltd	Materials	53	ASX 501 - 1000
174	FER	Fermiscan Holdings Limited	Health Care	23	ASX 1001 - 2200
175	GPR	Geopacific Resources NI	Materials	9	ASX 1001 - 2200
176	HIN	Heartware International, Inc	Health Care	78	ASX 501 - 1000
177	IOG	Incremental Oil And Gas Limited	Energy	26	ASX 1001 - 2200
178	ISK	Island Sky Australia Limited	Consumer Discretionary	1	ASX 1001 - 2200
179	KGL	Kentor Gold Limited	Materials	141	ASX 501 - 1000
180	KNH	Koon Holdings Limited	Industrials	34	ASX 501 - 1000
181	KRL	Kangaroo Resources Limited	Materials	464	ASX 101 - 300
182	LSL	Luminus Systems Limited.	Financials	11	ASX 1001 - 2200
183	MAC	Macro Corporation Limited	Consumer Discretionary	2	ASX 1001 - 2200

²² BHU listed on the ASX on 5 April 2012.

	ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$000,000)	Market capitalisation group as at 30.03.2012
184	MDL	Mineral Deposits Limited	Materials	525	ASX 101 - 300
185	MRC	Mineral Commodities Ltd	Materials	13	ASX 1001 - 2200
186	MSR	Manas Resources Limited	Materials	32	ASX 501 - 1000
187	MXU	Multiplex Sites Trust	Real Estate	338	ASX 301 - 500
188	OGC	Oceanagold Corporation	Materials	665	ASX 101 - 300
189	OHL	Omnitech Holdings Limited	Information Technology	0	ASX 1001 - 2200
190	OMH	Om Holdings Limited	Materials	266	ASX 301 - 500
191	OYM	Olympus Pacific Minerals Inc	Materials	46	ASX 501 - 1000
192	PGI	Panterra Gold Limited	Materials	112	ASX 501 - 1000
193	PVE	Po Valley Energy Limited	Energy	16	ASX 1001 - 2200
194	RMT	Rma Energy Limited	Energy	7	ASX 1001 - 2200
195	RRP	Realm Resources Limited	Materials	26	ASX 1001 - 2200
196	RVA	Reva Medical, Inc	Health Care	211	ASX 301 - 500
197	RWD	Reward Minerals Ltd	Materials	56	ASX 501 - 1000
198	SEH	Sino Gas & Energy Holdings Limited	Energy	128	ASX 501 - 1000
199	SHC	Sunshine Heart, Inc.	Health Care	41	ASX 501 - 1000
200	SIE	Scigen Limited	Health Care	2	ASX 1001 - 2200
201	SIP	Sigma Pharmaceuticals Limited	Health Care	743	ASX 101 - 300
202	SLE	Sino-Excel Energy Limited	Industrials	24	ASX 1001 - 2200
203	SPH	Sphere Minerals Limited	Materials	635	ASX 101 - 300
204	SST	Steamships Trading Company Limited	Industrials	807	ASX 101 - 300
205	SUM	Sumatra Copper & Gold Plc	Materials	23	ASX 1001 - 2200
206	SXX	Southern Cross Exploration N.L.	Materials	3	ASX 1001 - 2200
207	TGZ	Teranga Gold Corporation	Materials	341	ASX 301 - 500
208	TNR	Torian Resources NI	Materials	3	ASX 1001 - 2200
209	TON	Triton Gold Limited	Materials	5	ASX 1001 - 2200
210	TSM	Thinksmart Limited	Financials	54	ASX 501 - 1000
211	TXN	Texon Petroleum Ltd	Energy	153	ASX 301 - 500

A.2 ASX 10 listed entities (as at 30 March 2012)

ASX Code	Entity Name	GICS Sector	Market capitalisation as at 30.03.2012 (\$'000,000)	Market capitalisation group as at 30.03.2012
BHP	BHP Billiton Limited	Materials	111,157	ASX 20
CBA	Commonwealth Bank of Australia	Financials	79,222	ASX 20
WBC	Westpac Banking Corporation	Financials	67,082	ASX 20
ANZ	Australia and New Zealand Banking Group Ltd	Financials	62,325	ASX 20
NAB	National Australia Bank Limited	Financials	55,084	ASX 20
NWS	News Corporation	Consumer Discretionary	46,678	ASX 20
TLS	Telstra Corporation Limited	Telecommunication services	40,938	ASX 20
WES	Wesfarmers Limited	Consumer Staples	34,735	ASX 20
WOW	Woolworths Limited	Consumer Staples	31,875	ASX 20
RIO	Rio Tinto Limited	Materials	28,499	ASX 20

A.3 Global Industry Classification Standard (GICS)

GICS Sector
Energy
Materials
Industrials
Consumer Discretionary
Consumer Staples
Health Care
Financials
Information Technology
Telecommunication Services
Utilities

A.4 Market capitalisation groups

Market capitalisation groups
ASX 20
ASX 20 – 100
ASX 100 – 300
ASX 300 – 500
ASX 500 – 1000
ASX 1000 – 2200

B Appendix 2



B.1 Basis of analysis

Recommendation	Must report on an "if not why not" basis Questions	Measurement
2.4	Has the Board established a nomination committee?	Yes No
2.6	How many entities have disclosed a statement as to mix of skills and diversity which the Board is looking to achieve in its membership in the corporate governance statement in the annual report?	Yes No
	Out of the entities that have a statement, how many entities have given a description?	Yes No
3.2	How many entities have established a diversity policy?	Yes No
	(a) How many entities' diversity policies cover more than gender?	Yes No Not applicable
3.2	How many entities disclosed the diversity policy or a summary of the policy?	Yes No Not applicable
3.2	How many entities' diversity policies include requirements for the board to annually assess the objectives and the progress of achieving them?	Yes No Not applicable
3.2/3.3	How many entities disclosed that they had measurable objectives for gender diversity?	Yes No Not applicable
	(a) Out of the entities that had measurable objectives, how many disclosed what the measurable objectives were?	Yes No Not applicable

3.3	How many entities disclosed their progress towards achieving measurable objectives?	Yes No Not applicable
3.4	How many entities have disclosed in its annual report the proportion of:	
	(a) women employees in the whole organisation	Yes No
	(b) women in senior executive positions	Yes No
	(c) women on the board	Yes No
3.5	How many entities have not adopted the recommendations and included in the corporate governance statement an explanation?	Yes No Not applicable
3.5	How many entities have posted a copy of their diversity policy or summary on their website?	Yes No Not applicable

Commentary to recommendation	No requirement to report Questions	Measurement
2.4	How many entities provided greater transparency around processes to search for and select new board directors, including disclosing:	Entity's level of transparency around processes to search for and select new board directors: <ul style="list-style-type: none"> • LOW (L) = < 3 factors with general statements made • MEDIUM (M) = has 3-5 factors but only make general statements in relation to each • HIGH (H) = has all 5 factors and elaborates on the factors
	(a) Whether the entity has a skills matrix and uses it to identify gaps in skills and experience on the board;	None General statement Provided description
	(b)(i) The process to identify board candidates;	None General statement Provided description
	(b)(ii) Whether professionals are used to identify and/or assess candidates;	Yes No
	(c) Steps taken to ensure a diverse range of candidates is considered; and	None General statement Provided description
	(d) Factors taken into account in the selection process.	None General statement Provided description
8.1	How many entities stated that their remuneration committee considered remuneration by gender?	Yes No



Contact:

KPMG

Rosheen Garnon
National Managing Partner – Tax
+61 2 9335 7255
rgarnon@kpmg.com.au

Sarah Hodgson
Director
+61 8 9263 7440
sarahhodgson@kpmg.com.au

ASX

Giri Tenneti
Education Executive
ASX Compliance
+61 2 9227 0594
giri.tenneti@asx.com.au

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

© 2012 KPMG, an Australian partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative (“KPMG International”), a Swiss entity. All rights reserved. Printed in Australia.

The KPMG name, logo and “cutting through complexity” are registered trademarks or trademarks of KPMG International Cooperative (“KPMG International”).

Liability limited by a scheme approved under Professional Standards Legislation.

July 2012. WAN09857TAX.