



Diversity, Equity & Inclusion Policy

February 2024

About this Policy

Sets out ASX Group's organisational commitment to Diversity, Equity and Inclusion.

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1. Objective

1.1. Purpose

At ASX Group our highly diverse workforce is vital to building and maintaining a fair and dynamic marketplace. We want ASX Group to be a place where everyone feels like they belong and are respected, and diverse points of view are seen as critical to achieving our vision, purpose and strategy.

ASX Group is committed to creating and maintaining an inclusive workforce that values, embraces and celebrates diversity in all its forms including (but not limited to) sex, gender identity, gender expression, sexual orientation, race, ethnicity, cultural heritage, ability or disability, age, neurodiversity, religion, beliefs, relationship status, caring responsibilities, socioeconomic status or any other aspects of identity.

We recognise that diversity, equity and inclusion improve our ability to attract, inspire, develop and retain talent, create engaged and high performing teams, and manage risk in all its forms.

Fostering a safe, inclusive and respectful workplace is a critical way that we live our values. We do not tolerate discrimination, bullying, hostile working environments, victimisation or harassment (including sexual harassment and harassment on the grounds of sex) (See Appropriate Workplace Behaviour policy and Code of Conduct).

This Diversity, Equity and Inclusion policy sets out the guiding principles and practices which inform our approach to creating a diverse and inclusive workplace.

1.2. Scope

This enterprise policy applies to all ASX Group Staff (directors, employees, contractors, consultants and secondees), collectively referred to as '**ASX people**', '**you**' or '**your**'.

ASX Group means ASX Limited and all of its subsidiaries and is collectively referred to as '**ASX**', '**our**', '**we**' or '**us**'.

The philosophy and principles outlined in this Policy applies across the business, is the responsibility of all ASX Group Staff and must be adhered to by all parties acting for, or on behalf of, any part of ASX.

2. Diversity, Equity and Inclusion (DEI) at ASX Group

2.1. Principles and Requirements

We all have a role in supporting a diverse and inclusive workplace

All ASX Group Staff have a responsibility to create inclusion and celebrate the Diversity of our workforce. In particular, People Leaders and Senior People Leaders have a responsibility to encourage Diversity and Inclusion in their teams, minimise any Bias in people related processes and to model inclusive and respectful behaviours to ensure a strong and diverse culture at ASX, which will significantly contribute to our commercial success.

People Practices

ASX considers DEI in our People Practices by implementing where required processes, procedures, training and other interventions to minimise the impact of conscious, unconscious or systemic Bias. People Practices include but are not limited to:

- recruitment
- retention
- performance management
- promotions
- talent identification
- succession planning
- training and development
- terminations
- goal setting
- terms and conditions of employment

Successful recruitment and selection at all levels (including Board of Directors) is a fundamental part of building the future workforce we need to deliver on strategy. Candidate diversity also allows for different strengths and contributions to be brought to ASX.

DEI Pillars

ASX's Diversity, Equity & Inclusion Strategy is aligned to three pillars:

- Attract and retain a diverse workforce.
- Reward, develop and promote equitably.
- Create a culture of inclusion and belonging.

People & Culture design and implement a range of initiatives to ensure ASX Group continues to make progress across these pillars. Key areas of focus along with outcomes are identified in the Diversity, Equity & Inclusion Strategy, and a range of actions to enable us to reach these outcomes are defined by People & Culture and reviewed annually.

Gender Equality

At ASX, we believe in ensuring our workplace provides broadly equal opportunities and outcomes for all genders and ASX Group Staff are able to access and enjoy equal rewards, resources and opportunities regardless of gender.

ASX recognises that gender inequality is not experienced in the same way by all people, and that people have multiple dimensions to their identity (e.g. females with a disability, LGBTIQ+ identifying males) and we strive to, where possible, look at the intersection of gender identity and race, cultural identity, sexual orientation, disability, neurodiversity and all forms of identity, especially those that are underrepresented in our organisation.

1. ASX publicly sets and communicates gender balance targets and progression at organisational, Management, Executive and Board levels, which are measured and monitored through organisational metrics designed to ensure equity across our people processes.
2. ASX is focused on a holistic approach to promoting pay equity across the employee lifecycle. Our processes serve to raise awareness, ensure fairness, and identify and flag and address discrepancies and include:
 - a. Gender Pay Equity Action Plan which is committed to achieving pay equity at all levels. Progress against the Gender Pay Equity Action Plan is reported to tracked by the Remuneration People and Culture Committee and the Board of Directors. Pay analysis is provided by gender for like-for-like roles and 'average salary' and unexplained differences proactively addressed.
 - b. Ensuring no gender pay gap in like-for-like roles and with the same experience, skill level, education and experience.
 - c. Commitment to taking all reasonable steps to reduce ASX Group Organisational Average Gender Pay Gap year-on-year.

- d. Raising awareness of pay equality at Executive level, Board level, and across ASX employees .
 - e. Pay analysis by gender at all stages of people process (recruitment, remuneration review, promotion).
 - f. Compliance with legislated gender-based remuneration reporting requirements
3. At ASX we believe in the benefits of flexible working, and we have both formal and informal options in place that are available. Additional support is provided for parents and carers through our Parental Leave Policy and services provided by our Employee Assistance Provider.
 4. Every year we seek feedback from employees on Diversity, Equity and Inclusion experiences in our workplace (including Gender Equality) through our annual experience survey. The results of the survey are reported to both the Executive team and the Board of Directors. Our Employee Network Group, WE@ASX is dedicated to empowering and supporting women at ASX and fostering a gender equal culture.
 5. ASX Group has zero tolerance for discrimination, bullying, hostile working environments, victimisation or harassment (including sexual harassment and harassment on the grounds of sex) which is outlined in our Appropriate Workplace Behaviour policy. Matters relating to discrimination, bullying, hostile working environments, victimisation or harassment (including sexual harassment and harassment on the grounds of sex) are reported to the Board People & Culture Committee (PCC).
 6. Mandatory training and reporting ensures all employees are aware of the processes we have in place to ensure equality.

Further commitments are detailed in the Diversity, Equity & Inclusion Plans and will evolve to assist meet the requirements of our business and progress towards our targets.

2.2. Non-compliance

Compliance with this policy is a requirement of our Code of Conduct and your employment with ASX. A failure to comply with this policy may lead to disciplinary action, up to and including dismissal.

2.3. Grievances

ASX is committed to taking appropriate action where a grievance is raised under this policy. Should an ASX Group Staff member have a grievance under this policy, please refer to the ASX Group Appropriate Workplace Behaviour policy with respect to the grievance process.

2.4. Reporting

ASX measures and monitors diversity objectives through regular reporting and analysis, to the executive team and board. ASX Group complies with annual gender equality reporting to the Workplace Gender Equality Agency (WGEA) and any other legislated reporting requirements.

2.5. Privacy

ASX collects, uses, discloses and stores employee personal and sensitive information in relation to this policy, as set out in our Privacy Statement.

3. Accountabilities and Responsibilities

Accountable	Responsibilities
Board of Directors	Endorsement of DEI Strategy and key targets.
People & Culture Committee (PCC)	Approving and assessing on an annual basis the effectiveness of the DEI Strategy and DEI Plan.
ASX Employees	<p>All employees are responsible for understanding the value of a diverse workplace, respecting and valuing differences, and demonstrating inclusive behaviours that build a culture of inclusion and belonging.</p> <p>Meet the expectations outlined in this policy and related policies including:</p> <ul style="list-style-type: none"> - Appropriate Workplace Behaviour policy - Code of Conduct <p>Speak up against behaviours that don't align with our policies.</p>
People Leaders	<p>Model inclusive behaviours. Support diversity and inclusion in own teams. Take active steps to minimise own biases in people processes (see Key Terms).</p> <p>Meet the expectations outlined in this policy and related policies including:</p> <ul style="list-style-type: none"> - Appropriate Workplace Behaviour policy - Code of Conduct <p>Empower employees to speak up against behaviours that don't align with our policies.</p> <p>Aim to ensure equitable and fair treatment of all employees.</p> <p>Report incidents of behaviours that don't align with our policies.</p>
Senior People Leaders (Group Executive and General Manager)	As per People Leaders, plus model inclusive leadership behaviours. Champion the importance of DEI within the organisation. Take active steps to minimise own biases in all people processes.
Group Executives	As per Senior Leaders plus maintain accountability in balanced scorecards for ASX Group gender balance targets.
Executive Sponsors of ENGs	Visible leadership on the importance of DEI, and advocacy at executive and board level for the interests of the ENG, in alignment with the DEI strategy.
Policy Owner (People & Culture)	<p>Creating the DEI strategy, preparing policies and procedures and implementing the scope of work to meet the outcomes of the DEI Strategy. Measuring and reporting progress towards outcomes via key metrics of Diversity & Inclusion. Consultation with ASX Group People directly and via Employee Networking Groups (ENGs)</p> <p>Advise and guide all People Leaders on the implementation of this policy.</p>

4. Key Terms



Term	Meaning
Belonging	The extent to which our people feel safe, seen, secure, supported and respected at ASX Group.
Bias	A tendency (intentional or not) toward certain people, groups, ideas or outcomes. Unconscious or implicit bias is bias in individual thinking. Structural bias is bias in processes, policies, or practices.
DEI	Diversity, Equity and Inclusion.
Diversity	<p>The workforce composition that everyone, especially the underrepresented demographic populations, trust to be representative and accountable. Diversity is achieved through actions that explicitly counter inequities and meet the unique needs of all populations.</p> <p>ASX Group considers demographic diversity to broadly cover characteristics including but not limited to: age, sex, gender identity, gender expression, physical abilities and disability, neurodiversity, nationality, cultural background, race, ethnicity, language ability, marital, family or relationship status, caring responsibilities, religious and spiritual beliefs, sexual orientation, socio-economic status.</p>
Diversity, Equity & Inclusion Plans	The specific actions, initiatives, policies and procedures by which ASX Group will meet the intention and outcomes of the DEI strategy.
Diversity, Equity & Inclusion Strategy	The board-approved strategy which outlines the principles, pillars, focus areas and outcomes for DEI.
ENGs	Employee Networking Groups: volunteer groups that represent and advocate for employee communities including QASX (LGBTIQ+ community and allies), WE@ASX (Gender Equality), Culture&Heritage (cultural diversity), Giving (charitable giving and volunteering), Wellbeing (Physical and Mental Health).
Equality	When we all have the same rights, the same level of respect and the same access to opportunities.
Equity	When all individuals have opportunity to make the most of their careers at ASX Group. This involves eliminating or minimising discrimination, barriers, biases, stereotypes and accepting that, due to historical inequities, different people may require different things to have the same opportunities and outcomes.
Inclusion	<p>The achievement of an environment that all people, especially underrepresented and/or marginalised populations, trust to be respectful and accountable.</p> <p>Where all our people feel safe to speak up and be themselves. Where differences between us are not only accepted, but valued and promoted to drive diversity of thought, engagement, and productivity to drive our business outcomes.</p> <p>Inclusion is achieved through actions that explicitly counter present-day and historical inequities and meet the unique needs of all populations at ASX Group</p>
Intersectionality	Where different dimensions of identity, difference and inequity (e.g. race, gender, ability, sexuality, etc) are considered concurrently.
People practices	Including but not limited to, recruitment, retention, performance management, promotions, terms and conditions of employment, talent identification and succession planning, training and development, terminations and goal setting
Marginalised	A group sharing an identity or attribute that has lesser power and endures greater hardship in an environment because of those identities or attributes. This definition doesn't necessarily mean that someone has been specifically marginalised at ASX Group, rather, that their identity has meant they have endured marginalisation in their lives within society.

5. Federal and State Legislation

The following federal and state legislation covers workplace diversity and safety requirements in Australia:

- *Australian Human Rights Commission Act 1986* (Cth)
- *Age Discrimination Act 2004* (Cth)
- *Sex Discrimination Act 1984* (Cth)
- *Racial Discrimination Act 1975* (Cth)
- *Racial Hatred Act 1995* (Cth)
- *Disability Discrimination Act 1992* (Cth)
- *Workplace Gender Equality Act 2012* (Cth)
- *Fair Work Act 2009* (Cth)
- *Work Health and Safety Act 2011* (Cth)
- State-based anti-discrimination laws and equal opportunity laws
- State-based work health and safety laws

6. Other Relevant ASX Group Policies

- Equal Employment Opportunity
- Family and Domestic Violence Policy
- Parental Leave Policy
- Parental Leave Toolkit
- Infant Feeding Policy
 - Infant Feeding Room Procedure
 - Shared Use Room Protocol
- Dress Code
- Flexible Work Policy
- Reasonable Adjustments Policy
 - Reasonable Adjustments Form
- Workplace Health and Safety
- Privacy Statement

7. Contact

If you require further information, have any questions or wish to provide feedback on this Policy, please contact the Chief People Officer or your People & Culture Business Partner. Contact details can be found on the Contact People & Culture page of the People & Culture SharePoint site.

8. Document Control

People & Culture, as the policy owner is responsible for the development and implementation of this policy. **Senior People Leaders** (Group Executive and General Managers) are responsible for the implementation of the policy across their business units and responsibilities, as detailed in the Accountabilities and Responsibilities table.

This policy and associated documents are reviewed every two years

Version	Date	Author	Policy Approver	Summary of changes
	31/05/2016			Previous Version
1	01/05/2018	HR (Sue McDonald)		Update to new ASX Template only
2	14/02/2019	HR (Anna Wild)		Expanded Diversity
3	February 2024	Chief People Officer (Jane Franks)	ASX Limited Board	Updated template, updated terminology, key terms, inclusion of relevant Federal and State Legislation, inclusion of related policies, naming convention from ASX to ASX Group, Accountabilities and Responsibilities definitions. Expansion of Gender Equality.