

# ClearView Wealth Limited

ABN 83 106 248 248

Date 18/04/2024

ClearView Wealth Limited  
Diversity & Inclusion Policy

# CWL Diversity & Inclusion Policy

## Document Control & Version History

<b>Policy</b>	CWL Diversity & Inclusion Policy
<b>Document Owner</b>	Chief People Officer
<b>Number</b>	32
<b>Effective Date</b>	April 2024
<b>Review Period</b>	2 Yearly
<b>Scheduled Review Date</b>	April 2026

## Record of Amendments, Authorisations & Issues

Version	Revision Date	Drafted by	Nature of Amendment	Approval Required
1.0	19 October 2018	Legal and Company Secretariat	Minor Amendments	BRCC Chair
2.0	December 2020	Legal and Company Secretariat	No Amendments	
3.0	22 June 2021	Legal and Company Secretariat	Update to accommodate ASX Corporate Government Principles and Recommendations 4 <sup>th</sup> Edition	NRC
4.0	June 2022	Legal and Company Secretariat	No Amendment Recommended	Chief People Officer
5.0	June 2023	Legal and Company Secretariat	New Format but No Amendment	Board Noted
6.0	March 2024	Legal and Company Secretariat	Update to reflect the exit from the wealth management businesses and the Positive Duty under the Sex Discrimination Act 1984 (Cth).	GE, General Counsel & Corporate under Delegation
7.0	February 2025	Legal and Company Secretariat, People & Culture	No Amendment Recommended	Board Noted

## 1. Introduction

ClearView's Diversity and Inclusion policy has been established to define a framework for ClearView and document requirements for the Board to establish measurable objectives for achieving diversity and inclusion.

This policy is applicable to and for the benefit of all directors, employees (permanent and casual) and contractors of ClearView and its subsidiaries.

## 2. Purpose

2.1 At ClearView, we understand the benefits and importance of diversity within our leadership and our teams, we pride ourselves on our commitment to inclusion, and we respect and encourage different perspectives and experiences in a safe and respectful workplace. These ideals are captured in our core values of:

- a) Integrity
- b) Persistence
- c) Authenticity
- d) Collaboration

Which signpost this inclusive culture and the way we do things at ClearView, whilst helping to create unique experiences for each other, our customers, our shareholders, and the community.

2.2 The purpose of ClearView's Diversity and Inclusion policy is to ensure we:

- 2.2.1 Provide an equal opportunity employment environment for all people within our company including independent directors.
- 2.2.2 Are known as an equitable and fair employer and an "employer of choice" within and outside of our industry.
- 2.2.3 Acknowledge the importance of diversity and inclusion for the success of our business.
- 2.2.4 Attract and retain a diverse group of talent that meets the needs of our business and is reflective of our customer base, our shareholders and the business community in which we operate.
- 2.2.5 Provide leadership and a commitment to foster a safe and respectful workplace to eliminate any harmful conduct and bring about cultural change where required.

2.3 The policy has been designed to comply with the recommendations of the ASX Corporate Governance Council under its Corporate Governance Principles and Recommendations (**ASX Principles**) for ASX-listed entities but also in accordance with ClearView's Values, our desire to be an Employer of Choice and the obligations of the Positive Duty under the Sex Discrimination Act 1984 (Cth) - *Respect@Work*.

## 3. Objectives

ClearView aims to:

- 3.1 Promote a culture of inclusion at all levels of the organisation regardless of gender, marital or family status, sexual orientation, gender identity, age, disability, ethnicity, religious beliefs, or cultural and socio-economic backgrounds.

- 3.2 Adopt strategies to attract and retain people from diverse backgrounds, including in key leadership positions, such as independent directors and the Executive Leadership Team (ELT).
- 3.3 Ensure objectivity measures are in place for the performance management process, with a particular focus on equity in remuneration between male and female employees.
- 3.4 Have diversity indicators established as part of the Key Performance Indicators of the Managing Director and ELT members.
- 3.5 Train all managers in managing diversity, inclusion and Respect@Work.
- 3.6 Monitor and report performance relative to objective measures including reporting any material breaches to the ELT or where required the Board.

## 4. Strategies to Achieve Objectives

### 4.1 Recruitment (Internal and external)

#### 4.1.1 Advertising and short-listing

ClearView will consider all internal applicants and attract a more diverse range of applicants by:

- a) Advertising all positions internally and encouraging existing employees to refer colleagues;
- b) Encouraging all people of diverse backgrounds to apply when wording and advertising positions;
- c) Placing advertisements in appropriate publications to make them attractive and visible to a diverse range of applicants;
- d) Seeking input from other sources and require search consultants to provide a list of existing and emerging women directors and female senior executives as part of any recruitment process for director and senior executive positions;
- e) Requesting that search consultants include at least one woman in the candidates recommended to be short-listed who meets the criteria for the role for consideration for a position or an explanation as to why they believe there are no women within the market who have met these criteria; and
- f) Measuring and reporting on recruitment activity, broken down by gender (and, where possible, other diversity indicators).

#### 4.1.2 Selection

ClearView seeks to reward excellence and promotes its employees on the basis of their performance. All Managers will be trained in managing diversity and inclusion to ensure that employees are treated fairly and evaluated objectively.

When a suitably diverse pool of quality applicants has been obtained, candidates will be short-listed and selected based on merit.

Applicants who meet the role related criteria of the position will not be ranked numerically but will be placed in a pool of competitive candidates from which the final selection(s) will be made. The final selection will take into account the business needs identified above and the mix of appointees that will best meet the work-related criteria of a position.

In this way, the diverse backgrounds and experiences of each candidate will be objectively considered and ensure we guard against any conscious or unconscious biases that might discriminate against certain candidates.

## **4.2 Training**

ClearView will:

- a) Train the ELT and managers in managing diversity and inclusion to raise awareness about issues surrounding diversity and inclusion and to ensure that employees are treated fairly and evaluated objectively in accordance with this policy;
- b) Train all employees to raise their awareness about issues surrounding diversity and inclusion to ensure that employees are aware of this policy and the consequences of not applying it appropriately;
- c) Include diversity and inclusion training in induction processes for new staff;
- d) Provide annual refresher diversity and inclusion training for all employees;
- e) Train all staff in the Positive Duty requirements of the Sex Discrimination Act 1984 (Cth) Respect@Work;
- f) Emphasise that to maintain an inclusive workplace and culture, discrimination, harassment, vilification, and victimisation cannot and will not be tolerated.

## **4.3 Awareness**

ClearView will:

4.3.1 Collect, analyse and communicate all relevant data on:

- a) Proportion of women in each ClearView business unit at each level of employment.
- b) Pay levels and attrition rates of male and female employees in comparable positions.
- c) Pay equity outcomes based on gender, particularly for executive roles.
- d) Circulate the data to relevant stakeholders prior to publication in the annual Workplace Gender Equality Agency report.

4.3.2 Review and address any cultural impediments identified to women achieving management and ELT level roles, and where required, implement interventionist programs to affect change.

4.3.3 Provide a safe and inclusive environment for all employees including offering:

- a) Employee Assistance programs [EAP].
- b) Flexible working arrangements.
- c) Employee education assistance.
- d) Employee network and support groups.
- e) Open communication.

## 5. Key Performance Indicators

ClearView will incorporate diversity and inclusion indicators into the Key Performance Indicators for the Managing Director and the ELT to ensure progress is made towards achieving the objectives set in this policy. As the Company grows and it is practical to do so, these targets will be extended to managers who report to the ELT.

## 6. Monitoring & Reporting

ClearView will compile statistical reports to measure the objectives in this policy and rate their achievement. These reports will be presented by the Managing Director to the Board on an annual basis.

ClearView will also comply with all requirements of the Workplace Gender Equality Agency Act and report accordingly as and when reports are lodged.

## 7. Publication & Review of the Policy

This Diversity & Inclusion Policy will be made available on the Company's website and intranet.

This Policy is reviewed at least every two (2) years (or sooner to meet any regulatory requirements or guidance) to ensure it is operating effectively and whether any changes are required to the Policy.