

# **DIVERSITY, EQUITY AND INCLUSION GROUP POLICY**

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# Document Management

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## Related Policies and Procedures

Name	Name
Group Recruitment Policy	

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# 1 Policy Details

## 1.1 Background

At GDG, we are committed to fostering a diverse, inclusive and equitable workplace where everyone feels valued, respected and empowered to contribute. We believe that embracing diversity and actively promoting inclusion are not only the right things to do. They are also critical to our success as an organisation.

This Policy sets out GDG's expectations regarding diversity, inclusion and equity, and outlines the responsibilities of all Representatives (including leaders and managers) in supporting a culture where people of all backgrounds, identities and perspectives are treated fairly and have equitable access to opportunities.

GDG recognises that a truly inclusive workplace requires proactive efforts to identify and address systemic barriers, unconscious bias and cultural inequities that can impact individual and team outcomes.

Strict adherence to this Policy is required of all Representatives. Breaches of this Policy, such as engaging in discriminatory conduct or failing to support inclusive behaviours, will be taken seriously and may result in disciplinary action, up to and including termination of employment or engagement.

This Policy should be read in conjunction with the Group Workplace Health & Safety Policy, Disciplinary Policy, Acceptable Workplace Behaviour Policy, Grievance and Complaint Resolution Policy, and the relevant Company Code of Conduct.

## 1.2 Purpose

The purpose of this Policy is to articulate our commitment to fostering a diverse, equitable and inclusive workplace where all employees feel valued, respected and empowered to contribute. It aims to ensure that all people practices including recruitment, development, promotion, and remuneration are fair, inclusive and free from bias or discrimination.

This Policy sets out the principles and expectations that underpin our approach to diversity, equity and inclusion (DEI), and outlines how DEI is embedded in our culture, leadership accountability, and day-to-day decision-making. It supports our broader strategic objectives by recognising that diverse perspectives drive innovation, enable better risk management, improve performance and strengthen employee engagement.

Through this Policy, GDG seeks to create a workplace where everyone has equitable access to opportunities and feels a strong sense of belonging; regardless of gender, age, cultural identity, disability, sexual orientation, socioeconomic background, religion, family or caring responsibilities, or any other aspect of individual identity.

## 1.3 Scope

This Policy applies to all directors and employees of GDG and its subsidiaries in Australia, regardless of role, level, or employment type (including permanent, fixed-term, casual and contract workers).

It also extends to:

- People leaders and senior management, who are expected to demonstrate leadership in diversity, equity and inclusion and support the implementation of this Policy;
- Recruitment agencies, contractors, consultants and service providers engaged by GDG, who are expected to align with GDG's diversity, equity and inclusion principles when representing or working on behalf of the organisation;
- Employee-led network groups, whose activities contribute to the delivery of GDG's diversity, equity and inclusion strategy.

This Policy applies in all GDG workplaces, including remote or hybrid work environments, and at all work-related functions, events or interactions.

This Policy has been developed to align with applicable workplace laws and regulatory obligations in Australia and will be reviewed regularly to ensure continued compliance and relevance.

## 1.4 Roles & Responsibilities

### **All Representatives**

All Representatives of GDG are responsible for supporting a diverse, inclusive and equitable workplace. This means you must:

- Comply with this Policy and demonstrate inclusive behaviour aligned with GDG's values, treating all colleagues with dignity and respect, regardless of their background, identity or beliefs;
- Embrace and support diversity by challenging bias, stereotypes and discriminatory behaviour when witnessed;
- Undertake DEI training and development activities as required;
- Foster an environment where everyone feels safe, valued and heard;
- Seek guidance from the People & Culture team or a leader if unsure about your obligations under this Policy; and
- Promptly report suspected breaches of this Policy through the appropriate channels.

### **People Leaders**

In addition to their responsibilities as Representatives, People Leaders must also:

- Role model inclusive leadership and promote equitable practices across recruitment, development, performance and day-to-day management;
- Build and maintain psychologically safe and inclusive team environments where diverse perspectives are welcomed and respected;
- Actively monitor team dynamics and address non-inclusive behaviours or practices early and constructively;
- Ensure team members understand this Policy and complete all required DEI training; and
- Support and participate in GDG's diversity and inclusion initiatives, employee network groups, and measurable objectives.

## **People & Culture**

The People & Culture team plays a key role in embedding and supporting GDG's DEI strategy and will:

- Lead the development, implementation and review of DEI policies, programs and initiatives;
- Monitor and report on diversity metrics and measurable objectives to senior leadership and relevant committees;
- Provide advice, tools and resources to leaders and employees to build inclusive practices across the organisation;
- Deliver or coordinate DEI training for all employees and leaders as part of onboarding and ongoing development;
- Support employees and managers in responding to and resolving issues relating to discrimination, exclusion, or inequitable treatment in the workplace; and
- Ensure this Policy remains current and aligned with legislation and best practice through regular review.

## **1.5 Definitions**

**Business Unit:** The Business Unit that has engaged the Representative – Generation Life, Lonsec or Evidentia Group.

**GDG/The Group:** Generation Development Group Limited (ABN: 90 087 334 370) and its subsidiaries.

**People Leaders:** Any Representative who has people leadership responsibilities within GDG

**People & Culture:** People & Culture representative/s for the respective Business Units.

**Representatives:** All directors and employees (whether full time, part time or casual), contractors and consultants of GDG

**Women in Leadership:** the GDG CEO and direct reports, plus the subsidiary CEO and direct reports (excluding executive assistants)

## 2 Diversity, Equity and Inclusion

### 2.1 Diversity

Diversity refers to the range of differences that exist between people, including visible and non-visible characteristics such as gender, age, cultural identity, ethnicity, language, disability, neurodiversity, sexual orientation, religious beliefs, family and caring responsibilities, education, and life experience.

At GDG, we embrace diversity as a source of strength. We believe that a workforce made up of people with different backgrounds, perspectives, and experiences drives innovation, better decision-making and more inclusive services for our clients and community.

We actively seek to attract, retain and promote diverse talent at all levels of the organisation and are committed to creating opportunities that reflect the diversity of the communities in which we operate.

### 2.2 Equity

Equity is about ensuring fair access to opportunities, resources and outcomes by recognising and addressing barriers that may impact individuals or groups. While equality means treating everyone the same, equity acknowledges that different people may need different levels of support to succeed.

At GDG, we are committed to removing systemic and structural barriers that contribute to inequity. This includes ensuring fair and unbiased recruitment, development, remuneration, and promotion practices, and providing tailored support where needed, such as flexible work arrangements, accessible workspaces and return-to-work programs.

We regularly review our policies and processes to ensure they are equitable and support meaningful participation and progression for all employees.

### 2.3 Inclusion

Inclusion is the active, intentional and ongoing effort to ensure that every employee feels respected, valued, supported, and able to fully contribute at work.

At GDG, inclusion means creating a culture where diverse voices are welcomed and heard, and where everyone has a genuine sense of belonging. We encourage open dialogue, inclusive decision-making, and team environments where differences are celebrated and people feel psychologically safe to speak up.

Our leaders play a key role in fostering inclusion, and we expect all employees to contribute by demonstrating inclusive behaviours, challenging non-inclusive conduct, and supporting colleagues to thrive.

## 3 Our Approach to DEI

At GDG, diversity, equity and inclusion are fundamental to our organisational culture and long-term success. We recognise that fostering an inclusive workplace requires intentional, sustained effort across all levels of the business.

Our approach to DEI is grounded in the belief that:

- **Diversity** brings a variety of perspectives, experiences and ideas that drive innovation and better outcomes.
- **Equity** ensures that all employees have fair access to opportunities and the resources they need to succeed.
- **Inclusion** creates a workplace culture where everyone feels respected, valued and able to contribute fully.

We embed these principles across our business by focusing on the following pillars:

### 3.1 Leadership and Accountability

Our leaders are expected to role model inclusive behaviours, build diverse teams, and ensure equity in decision-making. People leaders are supported to develop inclusive leadership capabilities and are held accountable through performance objectives and KPIs aligned to DEI outcomes.

### 3.2 Governance and Oversight

Our DEI efforts are overseen by the GDG People & Culture function in collaboration with the Executive Team. Regular reporting on DEI progress, metrics and risks is provided to senior leadership and relevant governance bodies.

### 3.3 Data-Driven Insights

We use data to monitor progress, identify areas for improvement and inform our priorities. This includes tracking diversity metrics (e.g. gender composition, age), analysing equity in pay and promotion outcomes, and reviewing employee feedback and engagement data.

### 3.4 Inclusive Policies and Practices

Our policies and processes are reviewed regularly to ensure they promote equity and do not unintentionally exclude individuals or groups. We aim to embed inclusive practices throughout the employee lifecycle, from recruitment and onboarding through to career development, flexible work, and retirement.

### 3.5 Education and Awareness

We support all employees to build awareness, understanding and confidence in inclusive behaviours through regular training, resources and events. DEI education is part of both onboarding and ongoing development for all employees.



## 4 Inclusive Recruitment and Progression

GDG is committed to fair and inclusive recruitment and career progression practices that support diversity and equity across all levels of the organisation. We aim to remove barriers to participation and ensure that all candidates and employees, regardless of background or identity, have equal access to opportunities. Our recruitment and promotion processes are designed to be transparent, merit-based, and free from bias, with support provided to ensure accessibility and flexibility where needed.

## 5 Measurable Objectives and Progress Tracking

GDG is committed to setting measurable objectives that support the achievement of our diversity, equity and inclusion (DEI) vision. We recognise that meaningful progress requires clear targets, robust tracking, and transparent reporting across the Group.

We use a data-informed approach to identify gaps, monitor outcomes, and drive continuous improvement in DEI. This includes setting and reviewing objectives that support increased representation, equitable access to opportunities, and inclusive experiences across all stages of the employee lifecycle.

We will:

- Monitor and analyse workforce composition and diversity metrics (e.g. gender, age) to assess representation and identify areas for improvement;
- Review equity in key people processes, including recruitment, remuneration, promotions and development outcomes, to ensure fairness and identify any systemic barriers;
- Report on diversity outcomes in accordance with relevant regulatory obligations (e.g. Workplace Gender Equality Agency (WGEA) reporting) and internal governance requirements;
- Use employee engagement and feedback data to understand inclusion experiences and inform targeted actions; and
- Provide regular updates on DEI progress to senior leadership and the Board.

GDG supports the work of the Workplace Gender Equality Agency (WGEA) and align with its objectives to promote gender equality through the focus on the 6 gender equality indicators.

GDG acknowledges that women (and other non-male cohorts being LBQTI) are under-represented at both senior management level whilst well represented now at Board levels. The Board is committed to redressing this gender imbalance and has determined that increasing the representation of non-males at all levels, in particular at senior management and Board levels.

The Board has established measurable objectives for achieving gender diversity and assesses annually both the measurable objectives for achieving gender diversity and the progress in achieving them. The measurable objectives are included in Appendix A.

Business Units may set additional local targets where appropriate, with support from the People & Culture team. These objectives will be reviewed regularly to ensure they remain relevant, evidence-based and aligned with GDG's strategic goals.

## 6 Responsibility, monitoring and reporting

- This Policy reflects GDG's ongoing commitment to fostering a diverse, equitable and inclusive workplace where all individuals feel valued and empowered to thrive.
- The People & Culture team is responsible for the implementation, monitoring and review of this Policy. It will be reviewed at least every two years, or more frequently if required to ensure alignment with changes in legislation, best practice, or organisational priorities.
- Feedback from employees, employee networks and other stakeholders may be considered as part of the review process.
- This Policy is approved by the Executive Team and any material updates will be communicated to all Representatives.

## Appendix A – FY26 Measurable Objectives

The 3-year gender diversity targets are as follows:

- GDG Board women representation – maintain over 40%
- Women in Leadership – 40%
- Overall women representation – 45%

The definition of Women in Leadership is (excluding Executive Assistants):

- Executive Chairman, GDG CEO and CEO direct reports
- Subsidiary CEO and Subsidiary CEO direct reports