



HUB24 Group Diversity Policy

## Contents

| 1. | Ov                    | erview                             | 3 |  |  |
|----|-----------------------|------------------------------------|---|--|--|
| 2. | . Policy Requirements |                                    |   |  |  |
| 2  | 2.1                   | Recruitment & Selection            | 3 |  |  |
| 2  | 2.2                   | Talent & Development               | 4 |  |  |
| 2  | 2.3                   | Remuneration, Recognition & Reward | 4 |  |  |
| 2  | 2.4                   | Flexible Working                   | 4 |  |  |
| 3. | Rol                   | les & Responsibilities             | 5 |  |  |
| 4. | Definitions           |                                    |   |  |  |
| 5. | Breach of Policy      |                                    |   |  |  |
| 6. | Procedure Governance  |                                    |   |  |  |
| 7. | Rel                   | levant Documents                   | 7 |  |  |

### Overview

#### 1.1 Background & Purpose

- 1.1.1 HUB24 Limited (HUB24) is an ASX listed entity and the parent entity of the HUB24 Group of companies (HUB24 Group).
- 1.1.2 HUB24's focus on diversity and inclusion is about valuing the individual differences and the knowledge, skills and experience people bring to the workforce.
- 1.1.3 HUB24 considers diversity to broadly include (but is not limited to) characteristics such as age, gender, gender identity, physical ability, socio-economic background, cultural background and ethnicity, marital, family or relationship status, religious beliefs, and sexual orientation.
- 1.1.4 HUB24 promotes a culture where everyone feels respected and valued, and able to fully participate to the best of their ability with equal access to opportunity. The diversity of thought driven by inclusion promotes innovation, engagement and productivity, and aligns to HUB24's values and Code of Conduct.
- 1.1.5 As part of HUB24's commitment to diversity and inclusion, discrimination, bullying, harassment, vilification and victimization will not be tolerated.
- 1.1.6 This policy has regard to the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations 4<sup>th</sup> Edition and relevant laws and regulations in relation to diversity and inclusion and employment obligations.

#### 1.2 Scope & Application

1.2.1 This policy applies to all of HUB24 Group, including the Board, directors, Group Executives, People Leaders, employees and contractors (Our People).

## 2. Policy Requirements

### 2.1 Recruitment & Selection

- 2.1.1 HUB24 fosters a culture where applicants are assessed and appointed on the basis of the suitability of their skills, experience and demonstrated capabilities, and alignment to HUB24's values.
- 2.1.2 Recruitment and selection practices aim to eliminate bias (real or perceived) and are designed to attract and engage a diverse range of candidates for consideration.
- 2.1.3 HUB24 is committed to hiring people with the qualities and capabilities to do the best job, regardless of gender, gender identity, sexual orientation, age, marital or family status, ethnicity, disability, religious believes or any other attribute.
- 2.1.4 HUB24 proactively works to create broad and diverse candidate pools and seeks to ensure an unbiased selection process to maintain a diverse workforce, aligned with achieving our diversity outcomes and committed targets.
- 2.1.5 HUB24 recognises the importance of accessibility and is committed to providing reasonable workplace accommodations to employees with disabilities, to ensure they can perform their duties effectively and fully participate in the workplace.

#### 2.2 Talent & Development

- 2.2.1 HUB24 promotes a culture of continuous learning and ensures that learning opportunities for Our People are made available on an equitable basis, ensuring any bias (real or perceived) is removed from decision making.
- 2.2.2 HUB24 encourages and supports growth and development opportunities for all Our People, to help them perform in their role, enhance their opportunities for promotions, role changes, secondments, stretch initiatives and other forms of career advancement to support all Our People in reaching their full potential.
- 2.2.3 Talent planning processes will ensure the identification of talent from a range of backgrounds and a balance of gender diversity to facilitate a more diverse and representative workforce and management structure throughout the business.
- 2.2.4 Managers work closely with identified high potential talent to develop their skills, experience and capability in order to build succession within their team and across the organisation.

#### 2.3 Remuneration, Recognition & Reward

- 2.3.1 HUB24 recognises and rewards achievement based on performance, merit, delivering outcomes, balanced with values-based behaviours.
- 2.3.2 HUB24 performance and remuneration review processes are applied consistently to all Our People, including undertaking review during the planning phase to mitigate any potential biases in these processes.
- 2.3.3 HUB24 endeavours to ensure there is no direct or indirect discrimination against any of Our People for reason regarding the remuneration they receive.
- 2.3.4 HUB24 review remuneration for 'like for like' roles on an annual basis to identify any potential pay gaps that may arise, including specifically considering any gender pay gaps and will address any gaps identified.

#### 2.4 Flexible Working

- 2.4.1 HUB24 recognises the value of supporting flexible work arrangements where it is possible and practical to do so.
- 2.4.2 We aim to allow Our People with flexible arrangements in a way that balances their work and external responsibilities whilst continuing to manage our business operations and priorities.
- 2.4.3 We aim to support Our People to access and utilise benefits including paid parental leave, part-time and other flexible working arrangements (including the ability to work from home or remotely) regardless of gender, family or carer responsibilities, or any other characteristics.
- 2.4.4 When determining flexible working arrangements, consideration is given to any impact to business outcomes, the importance of role and team-based requirements, the needs of our clients, and the individuals circumstances.

# 3. Roles & Responsibilities

| Role               | Responsibilities   |
|--------------------|--|
| Board              | The HUB24 Board is ultimately responsible for the HUB24 Group Diversity Policy   |
| RNC                | In order to assist the Board in discharging its responsibilities, the Board has established and delegated certain functions to the HUB24 Remuneration & Nomination Committee (RNC)   |
|                    | The RNC's role includes but is not limited to:   |
|                    | <ul> <li>The process for creating and maintaining appropriate diversity<br/>including the recruitment of new directors, including evaluating the<br/>balance of skills, knowledge, experience, independence and diversity<br/>on the Board and, in light of this evaluation, prepare a description of<br/>the role and capabilities required for a particular appointment</li> </ul> |
|                    | <ul> <li>Monitoring and reporting any gender or other inappropriate bias<br/>generally or in remuneration for HUB24 Directors, senior executives<br/>or other employees and</li> </ul>   |
|                    | <ul> <li>Promoting diversity and inclusion and within the HUB24 Group</li> </ul>   |
| Group<br>Executive | Continually reinforcing the HUB24 Group's approach to diversity and inclusion  |
|                    | Ensuring that Our People receive appropriate training on their responsibilities under this policy  |
|                    | Ensuring appropriate and proportionate remedial or disciplinary action is taken in relation to any breach of this policy   |
| People Leaders     | Ensuring their management practices, behaviours and decision making is consistent with the principles set out in this policy   |
| Our People         | Our People are accountable for observing this policy and applying it as part of their day to day practices   |
|                    | Ensuring their behaviour is consistent with the principles set out in this policy and our Code of Conduct  |
|                    | Respecting and valuing individual differences  |

### 4. Definitions

| Term                | Definition   |
|---------------------|--|
| HUB24               | HUB24 Limited.   |
| HUB24 Group         | HUB24, the parent entity of the HUB24 Group of companies, and all of its subsidiaries.   |
| Board               | HUB24 Limited Board of directors   |
| Group<br>Executive  | All direct reports of the Managing Director or as otherwise designated a Group Executive by the Managing Director.   |
| Our People          | All HUB24 Group directors, officers, employees, and contractors as well as subcontractors, distributors, and consultants who, as part of their engagement are required to carry out their duties on behalf of the HUB24 Group. |
| People Leader       | Anyone within the HUB24 Group with direct report/s.  |
| People &<br>Culture | Refers to the People & Culture (Human Resources) team within HUB24 Group.  |
| Subsidiaries        | Member entities of the HUB24 Group.  |

## 5. Breach of Policy

- 5.1 Failure to comply with this Policy is considered a serious matter and may result in disciplinary action against the individual involved.
- 5.2 In instances of deliberate or reckless non-compliance, such measures may extend to termination of employment.
- 5.3 Potential or actual material breaches of obligations outlined in this Policy must be escalated according to the Group Incident & Breach Management Policy.

### Procedure Governance

#### 6.1 Review Cycle:

6.1.1 This Policy is reviewed every two years or more frequently if there is a significant change to the HUB24 strategy, operating environment or legislative updates.

#### 6.2 Approval:

- 6.2.1 Minor amendments are approved by the Chief People Officer.
- 6.2.2 Major amendments are approved by the Chief Executive Officer and RNC.
- 6.3 Exemption Authority: Chief People Officer or Chief Executive Officer

## 7. Relevant Documents

- 7.1 HUB24 Group Code of Conduct
- 7.2 HUB24 Group Bullying, Harassment & Discrimination Policy
- 7.3 HUB24 Group Flexible Working Policy