

Diversity Policy

NORTHAM RESOURCES LTD
ACN 619 335 321

Approved by Board	
Approved on	14/07/2022
Next Review Date	14/07/2023

1. Introduction

The Company, the Company's stated values and all the Company's related bodies corporate are committed to workplace diversity.

The Company recognises the benefits arising from employee and Board diversity, including a broader pool of high-quality employees, improving employee retention and motivation, accessing different perspectives and ideas, and benefiting from all available talent.

The Company is committed to inclusion at all levels of the organisation, regardless of gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, cultural background, socio-economic background, perspective, and experience.

To the extent practicable, the Company will consider the recommendations and guidance provided in the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations – 4th Edition where appropriate to the Company.

This Diversity Policy does not form part of an employee's contract of employment with the Company, nor gives rise to contractual obligations. However, to the extent that the Diversity Policy requires an employee to do or refrain from doing something and at all times subject to legal obligations, the Diversity Policy forms a direction of the Company with which an employee is expected to comply.

The purpose of this Code of Conduct is to provide a framework for decisions and actions in relation to ethical conduct in employment. It underpins the Company's commitment to integrity and fair dealing in its business affairs and to a duty of care to all employees, clients, and stakeholders.

2. Objectives

The Diversity Policy provides a framework for the Company to achieve:

- a. a diverse and skilled workforce, leading to continuous improvement in service delivery and achievement of corporate goals;
- b. a workplace culture characterised by inclusive practices and behaviours for the benefit of all staff;
- c. an inclusive workplace where discrimination, harassment, vilification, and victimisation cannot and will not be tolerated;
- d. improved employment, talent management and career development opportunities for women;
- e. enhanced recruitment practices whereby the best person for the job is employed, which requires the consideration of a broad and diverse pool of talent;
- f. a work environment that values and utilises the contributions of employees with diverse backgrounds, experiences, and perspectives through improved awareness of the benefits of workforce diversity and successful management of diversity; and

- g. awareness in all staff of their rights and responsibilities with regards to fairness, equity, and respect for all aspects of diversity,

(collectively, the **Objectives**).

The Diversity Policy does not impose on the Company, its directors, officers, agents, or employees any obligation to engage in, or justification for engaging in, any conduct which is illegal or contrary to any anti-discrimination or equal employment opportunity legislation or laws in any State or Territory of Australia or of any foreign jurisdiction.

3. Responsibilities

3.1 The Board's Commitment

The Board is committed to workplace diversity and supports representation of women at the senior level of the Company and on the Board where appropriate.

The Board maintains oversight and responsibility for the Company's continual monitoring of its diversity practices and development of strategies to meet the Objectives.

The Board is responsible for developing measurable objectives and strategies to meet the objectives of the Diversity Policy (**Measurable Objectives**) and monitoring the progress of the Measurable Objectives through the monitoring, evaluation and reporting mechanisms listed below. The Board shall annually assess any Measurable Objectives (if any), and the Company's progress towards achieving them.

Subject to the size and operations of the Company, the Board may also set Measurable Objectives for achieving gender diversity and monitor their achievement.

The Board will conduct all Board appointment processes in a manner that considers all facets of diversity, including establishing a structured approach for identifying a pool of candidates and using external experts where necessary, to avoid groupthink or other cognitive biases in decision making.

3.2 Strategies

The Company's diversity strategies may include:

- a. recruiting from a diverse pool of candidates for all positions, including senior management and the Board;
- b. structuring recruitment and selection practices at all levels so that a diverse range of candidates are considered and to guard against any conscious or unconscious biases that might discriminate against certain candidates;
- c. reviewing succession plans to ensure an appropriate focus on diversity;
- d. identifying specific factors to take account of in recruitment and selection processes to encourage diversity;
- e. developing programs to develop a broader pool of skilled and experienced senior management and Board candidates, including, workplace development programs, mentoring programs and targeted training and development;
- f. developing a culture which takes account of domestic responsibilities of employees; and

- g. any other strategies the Board develops from time to time.

4. Flexible Work Practices

The Company supports flexible work practices to assist employees to manage their personal and work commitments.

The Company offers employees on extended parental leave the opportunity (without any obligation) to maintain their connection with the Company, by allowing such employees to receive all-staff communications, and to attend work functions and training programs.

5. Monitoring and Evaluation

The Chairperson of the Board will monitor the scope and currency of this policy annually.

The Company is responsible for implementing, monitoring, and reporting on the Measurable Objectives.

Measurable Objectives as set by the Board, may be included in the annual key performance indicators for the Chief Executive Officer/Managing Director and senior executives.

In addition, the Board will review progress against the Measurable Objectives as a key performance indicator in its annual performance assessment.

If the Company undertakes a gender pay equity audit (which must be approved by the Board), the Board will consider the results of any such audit and any disclosure related issues.

6. Reporting

The Company will disclose, for each financial year:

- a. any Measurable Objectives set by the Board;
- b. progress against these Measurable Objectives; and
- c. either:
 - i. the respective proportions of men and women on the Board, in senior executive positions (including how the Company has defined “senior executive” for these purposes) and across the whole Company; or
 - ii. if the entity is a “relevant employer” under the Workplace Gender Equality Act, the entity’s most recent “Gender Equality Indicators”, as defined in the Workplace Gender Equality Act.