



Diversity Policy for Manhattan Corporation Limited (the Company)

This policy supports Manhattan's statement of values and operates in conjunction with the law.

1 Introduction

- (a) Manhattan Corporation Limited and its subsidiaries (collectively, **Manhattan**) acknowledge the positive outcomes and corporate benefits that can be achieved through a diverse workplace, including the ability to attract, retain and motivate directors, officers and employees from the widest possible pool of available talent.
- (b) Manhattan recognises and utilises the contribution of diverse skills and talent from its officers and employees. Manhattan also recognises that to have a properly functioning diverse workplace, discrimination, bullying, harassment, vilification and victimisation cannot and will not be tolerated.
- (c) Diversity extends beyond gender and includes, but is not limited to marital or family status, sexual orientation, gender identity, age, disabilities, religious belief, cultural background, socio-economic background, perspective and experience.
- (d) Manhattan's policies foster a fair and inclusive workplace.
- (e) This policy applies to all officers, employees and all people who work at Manhattan, including contractors and consultants.

2 Commitment of Manhattan

Manhattan will endeavour to:

- (a) ensure that Manhattan's corporate culture and values, at all levels of the organisation, support diversity and inclusion whilst maintaining a commitment to a high-performance culture;
- (b) ensure that recruitment and selection practices at all levels are appropriately structured so that a diverse range of candidates are considered and that there are no conscious or unconscious biases that might discriminate against certain types of candidates;
- (c) design and implement programs and processes that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare them for senior management and board positions;
- (d) support an individual's domestic responsibilities (including the adoption of flexible work practices that will assist them to meet those responsibilities);
- (e) provide opportunities for employees on extended parental leave to maintain their connection with the workplace;
- (f) ensure the policy for selection and appointment of new directors is transparent and considers all facets of diversity to avoid "groupthink" or other cognitive biases in decision making;
- (g) ensure development and succession plans for directors and senior management include gender diversity as a relevant consideration;

- (h) monitor and measure the achievement of all diversity objectives set by the Board;
- (i) consider whether key performance indicators for senior management might be an appropriate way of furthering gender diversity objectives; and
- (j) ensure the Board sets and reviews measurable objectives in relation to gender diversity in the composition of its Board, senior management and workforce generally (**Objectives**) on an annual basis to identify ways in which the achievement of gender diversity at Manhattan is measured, and in relation to other aspects of this diversity policy.

3 Responsibilities

- (a) The Board has formally adopted this policy, reflecting a commitment by the Board for accountability across Manhattan to achieve its diversity goals.
- (b) The Board has responsibility for this policy, including its regular review and the monitoring of its effectiveness.
- (c) The Board has responsibility to:
 - (i) annually set and review the Objectives and, where appropriate, other aspects of diversity including in respect of women in leadership, age diversity and cultural diversity;
 - (ii) assess annually Manhattan's progress in achieving the Objectives; and
 - (iii) disclose:
 - (A) the Diversity Policy on Manhattan's website;
 - (B) the Objectives and Manhattan's progress in achieving the Objectives in Manhattan's annual report; and
 - (C) the respective proportions of men and women on the Board, in senior executive positions and across the whole organisation (including how the entity has defined "senior executive" for these purposes) for the entity's Gender Equality Indicators, as defined in the *Workplace Gender Equality Act 2012* (Cth).
- (d) If Manhattan 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.
- (e) The Board will be responsible for approving any key performance indicators for senior management in relation to any of Manhattan's diversity Objectives.

4 Behaviour of Manhattan's people

Manhattan recognises that to have an inclusive workplace discrimination, harassment, vilification and victimisation cannot be tolerated; demonstration of such behaviours may lead to disciplinary action being taken against the employee including dismissal in serious cases.

5 Review and changes to this policy

- (a) The Committee will review this policy annually or as often as it considers necessary to check it is operating effectively and consider whether changes are required.
- (b) The Board may change this policy from time to time by resolution.

Policy History

Date	Change Reason
June 2020	1 st Revision
July 2015	Policy adopted by the Board