



Diversity Policy

Spirit Telecom Limited

ACN 089 224 402

1. Overview

- 1.1 Spirit Telecom Limited (ACN 089 224 402) (**Company**) is committed to establishing and maintaining an inclusive workplace that embraces and promotes Diversity. This Diversity Policy (**Policy**) sets out the Company's commitment to Diversity and inclusion in the workplace and provides a framework to achieve the Group's diversity goals.
- 1.2 The Company recognises the strategic and personal advantages that arise from a workplace where decisions are based on merit and where all Employees are treated equally.

2. Definitions

- 2.1 In this Policy, unless the context otherwise requires:

ASX means ASX Limited (ABN 98 008 624 691) or the financial market conducted by ASX Limited, as the context requires.

Board means the board of directors of the Company.

Diversity includes, but is not limited to, differences that relate to gender, age, ethnicity, disability, sexual orientation and gender identity, religion, cultural background, personality, marital and family status, carer responsibilities and location.

Employee means a person who is an employee, officer, or director of the Group.

Group means the Company and its subsidiaries.

3. Who does this Policy apply to?

- 3.1 This Policy applies to the Company's Board as a whole, and to all Employees individually.

4. Benefits of this Policy

- 4.1 The Company has adopted this Policy to acknowledge and appreciate the positive outcomes that can be achieved through the diverse range of abilities and perspectives that Employees bring to the Group through their Diversity.
- 4.2 The Company understands that organisational performance is linked to an inclusive environment that embraces and promotes Diversity.
- 4.3 This Policy is specifically designed to assist the Company to reach its strategic goals by:
- (a) ensuring that all Employees are treated with equality and respect;
 - (b) facilitating employment opportunities based on appropriate recruitment processes of considering a range of employees and attracting, rewarding and retaining staff with a diverse range of skills and experience;

- (c) developing flexible workplace practices to recognise and meet the diverse needs of Employees;
 - (d) building and maintaining a safe and open workplace;
 - (e) contributing to the community by fostering a culture of acceptance and teamwork; and
 - (f) meeting the Company's obligations under the ASX Corporate Governance Principles and Recommendations.
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5. Objectives

- 5.1 The Board will establish Diversity related measurable targets (**Measurable Objectives**) on an annual basis to identify ways in which gender diversity and other appropriate aspects of Diversity can be achieved and measured.
 - 5.2 The Measurable Objectives are to include, at a minimum, the Company's objectives for achieving gender diversity.
 - 5.3 The Board will assess annually the Measurable Objectives and the Group's progress in achieving them.
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6. Responsibilities

- 6.1 The Board has responsibility to:
 - (a) oversee this Policy including the review of its appropriateness and effectiveness;
 - (b) encourage and promote any other initiatives, policies and processes appropriate from time to time to encourage and promote Diversity;
 - (c) annually set and review the Measurable Objectives;
 - (d) annually assess the Company's progress towards achieving the Measurable Objectives; and
 - (e) ensure compliance with the ASX Corporate Governance Principles and Recommendations in respect of Diversity.
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7. Publication of this Policy and the Company's progress

- 7.1 This Policy will be available on the Company's website.
- 7.2 The Company will provide information its annual report regarding:
 - (a) key features of this Policy;
 - (b) the Measurable Objectives and the Company's progress towards achieving them; and
 - (c) the respective proportions of men and women on the Board, in senior executive positions and across the whole organisation.

8. Employee rights and obligations

- 8.1 This Policy is aspirational, and does not form part of an Employee's terms of employment, appointment or engagement with the Group. A departure from the Policy or a failure to meet Measurable Objectives may result in reporting obligations for the Company, but is not intended to create direct legal obligations between the Group and Employees.
- 8.2 This Policy is not to be used by the Group, or any Employee, to justify conduct which is contrary to any anti-discrimination or equal employment opportunity laws in any jurisdiction.