

Inclusion & Diversity Policy

Netwealth Group Ltd
ABN 84 620 145 404
Level 6 180 Flinders Street
Melbourne VIC 3000
PO Box 336
South Melbourne VIC 3205

Netwealth Group Limited

Approved and adopted by:

- Netwealth Group Limited (ACN 620 145 404) (**NWL**) on 29 November 2023
- Netwealth Group Services Pty Ltd (**NGS**) (ABN 89 135 940 840) on 29 November 2023

Document classification: General Use.

This document is for general use. Modification of content is prohibited unless you have Netwealth's express prior written consent.

Document Version Control:

Document Owner	Chief People Officer
Frequency of review	Annually
Date of next internal review	November 2024
Regulator(s)	<ul style="list-style-type: none">• ASX• Australian Human Rights Commission• Fair Work Ombudsman• Workplace Gender Equality Agency• Equal Opportunity Commissions and Human Rights Commissions in each State and Territory
Legislative framework	<ul style="list-style-type: none">• <i>Fair Work Act 2009</i> (Cth)• <i>Sex Discrimination Act 1984</i> (Cth)• <i>Disability Discrimination Act 1992</i> (Cth)• <i>Racial Discrimination Act 1975</i> (Cth)• <i>Age Discrimination Act 2004</i> (Cth)• <i>Workplace Gender Equality Act 2012</i> (Cth);• <i>Respect@Work Act 2022</i> (Cth)• <i>ASX Corporate Governance Council's Principles and Recommendations (4th Edition)</i>

1 Introduction

Netwealth Group Limited recognises that an inclusive and diverse workforce improves financial performance by creating workplaces that encourage innovative decision making by drawing on the wide range of ideas, experiences, approaches, and perspectives that employees from diverse backgrounds and differing skills sets bring. This in turn creates a working environment where people feel like they belong and enjoy coming to work.

Underpinning our approach to inclusion and diversity are our values of being Agile, Collaborative, Courageous, Genuine, Optimistic and Curious, which guide our behaviours and decision making.

This Inclusion and Diversity Policy (**Policy**) sets out the policy of Netwealth Group Limited and its subsidiaries (collectively referred to as Netwealth) in relation to its commitment to creating an inclusive culture in which diversity is recognised and valued.

Diversity includes but is not limited to gender, age, race, ethnicity, disability, marital status, family responsibilities, religion, cultural background, sexual orientation, and gender identity.

1.1 Purpose

The purpose of this Policy is to enable the board of Netwealth (**the Board**) to:

- Support the Netwealth Values;
- Set the vision and Diversity Objectives for our Inclusion and Diversity Strategic Roadmap;
- Set the frameworks, targets, and metrics for achieving identified Diversity Objectives; and
- Annually review and assess those frameworks and the effectiveness of them in achieving Netwealth's Diversity Objectives.

1.2 Application

This Policy applies to all of Netwealth's people, who include but may not be limited to:

- (a) The Board; and
- (b) All Netwealth officers, employees and all people who work for Netwealth, including contractors and consultants engaged by Netwealth.

This Policy is to be read in conjunction with Netwealth's:

- (a) Values;
- (b) The Way We Work Together Code of Conduct;
- (c) Anti-Discrimination, Bullying and Harassment Policy;
- (d) Work Health and Safety Policy; and
- (e) other employment related policies and documentation.

This Policy is not intended to create any contractually binding obligation on Netwealth and is not incorporated into contract of employment or engagement.

1.3 Roles and responsibilities

The following table sets out the key roles and responsibilities for those involved in implementing and monitoring the Policy.

Roles	Responsibilities
Netwealth Group Limited Board	<ul style="list-style-type: none"> Review and approve the Policy; Establish and set relevant publicly disclosed metrics as well as internally monitored metrics; Assess established metrics annually to monitor Netwealth’s progress in achieving these metrics; Disclose the relevant metrics set for the reporting period and Netwealth’s progress in achieving the objectives in the Netwealth Group Corporate Sustainability Report.
Netwealth PCSC	<ul style="list-style-type: none"> Review and endorse the Policy to the Board for approval; Monitor compliance with the Policy and report risks and issues to the Compliance and Risk Management Committee; Review and provide feedback on the Policy and the supporting Strategic Roadmap to People & Culture (P&C); and Provide oversight of the Policy, including regular review and monitoring of its effectiveness.
Remuneration Committee	<ul style="list-style-type: none"> Consider the results of any gender pay equity and/or gender pay gap audits that have been conducted and considers and where required, undertakes the disclosure of any related issues.
Netwealth CRMC	<ul style="list-style-type: none"> Oversee risks, and the associated controls applicable to this Policy; and.
Chief People Officer	<ul style="list-style-type: none"> Recommend updates and amendments to this Policy to the PCSC for endorsing to the Board; Disclose the gender diversity on Board and Executive positions and Netwealth’s Gender Equity Indicators, as defined in the Workplace Gender Equality Act 2012 (Cth); Create internal frameworks that identify risks, hazards and outline appropriate controls that are relevant to this Policy, as defined in the Respect @ Work Act 2022 (Cth); Regularly review relevant internal management standards and roadmaps and procedures to see that they continue to align to this Policy; Promote compliance of this Policy; and Overall accountability for the communication and implementation of this Policy.
CFO and Joint Company Secretary	<ul style="list-style-type: none"> Disclose a copy of this Policy on the Shareholder section of Netwealth’s website; and Disclose relevant diversity metrics in Netwealth Group Limited’s Corporate Sustainability Report and Annual Report.
Management	<ul style="list-style-type: none"> Proactively promote compliance with the Policy; and Assist the Chief People Officer (or delegate) as requested.
Netwealth Employee(s) (Employee)	<ul style="list-style-type: none"> Know, understand, and comply with Netwealth policies and procedures concerning inclusion and diversity, including this Policy;

Roles	Responsibilities
	<ul style="list-style-type: none"> Attend and complete all compulsory training covering inclusion, diversity and workplace behaviours; Add to the company culture by demonstrating the Netwealth's values and the ways of working.

2 Commitment to diversity

Netwealth is committed to:

- Maintaining and building on our inclusive culture, where our people feel like they belong, are accepted, connected and are comfortable to share their ideas, opinions and challenge each other;
- Building diverse teams that are representative of our clients and community, which enables us to tap into a wider range of thoughts and ideas by drawing on different experiences, approaches and perspectives;
- Continuing to build inclusive systems and processes by taking conscious steps to remove bias so that we can better support employees and prospective employees to be successful;
- Having a zero tolerance for discrimination, harassment, vilification and victimisation so as to promote an inclusive workforce;
- Monitoring and measuring the achievement of all diversity objectives set by the Board;

(collectively, our **Diversity Objectives**).

This Policy does not impose on Netwealth, 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 place Netwealth does business.

3 Overriding Principles

Nothing in this Policy should be interpreted as endorsing:

- Selection and promotion of people to work with Netwealth solely for reasons other than their ability to perform the role and duties required;
- Any discriminatory behaviour by Netwealth or Employees, contrary to the law, or any applicable codes of conduct; or
- Any existing Employee of Netwealth feeling threatened or prejudiced by this Policy in their role at Netwealth because their diversity attributes are different to others.

4 Disclosure of the Policy

This Policy, and any changes to the Policy, will be communicated by Netwealth to its Netwealth Employees, and publicly on its website.