



YellowBrickRoad
Wealth Management

DIVERSITY & INCLUSION POLICY

October 2020

1. Application of this Policy

This Diversity & Inclusion Policy ("**Policy**") applies to the following entities:

- Yellow Brick Holdings Limited ABN 44 119 436 083;
- ExchangeIQ Advisory Group Pty Ltd ABN 86 003 990 627;
- Yellow Brick Road Wealth Management Pty Limited ABN 93 128 650 037;
- Yellow Brick Road Finance Pty Limited ABN 33 128 708 109;
- Resi Mortgage Corporation Pty Limited ABN 61 092 564 415;
- Resi Wholesale Funding Pty Limited ABN 22 140 674 120;
- Vow Financial Pty Ltd ABN 66 138 789 161;
- Vow Wealth Management Pty Limited ABN 46 149 304 469;
- Vow Financial Group Pty Limited ABN 26 135 411 12 and;
- Loan Avenue Holdings Pty Limited ABN 42 611 315 416

(each a "**Company**", and collectively referred to as the "**Group**").

This Policy applies to all Directors, officers, staff, employees, agents and contractors of the Group. The Policy does not apply to the engagement of brokers under franchise arrangements or through other agreements with the Group. However, franchisees and broker groups are expected to have practices in place that reflect the intentions of this Policy.

2. Introduction

The Group is committed to fostering an inclusive workplace that embraces diversity.

Diversity in this context relates to gender, age, language, ethnicity, cultural background, political, disability, religion, sexual orientation, and caring responsibilities. Diversity also refers to the other ways in which people are different, such as education level, life experience, work experience, socio-economic background, and marital status. Workplace diversity involves recognising the value of individual differences and managing them in the workplace.

This Policy outlines the Group's commitment to promoting Diversity and Inclusion in the workplace and to fostering equitable opportunities and fair treatment for all employees and officers of the Group. It also demonstrates the Group's commitment to ensuring that employees and officers are treated with fairness and respect and are not judged by unlawful or irrelevant reference to gender, age, language, ethnicity, cultural background, disability, religion, sexual orientation or caring responsibilities. This commitment enables the Group to attract and retain people with the best skills and abilities.

3. Legal & Regulatory Obligations

In Australia, there are many laws (both State and Federal) that create obligations for the Group relating to workplace diversity. These laws are often referred to collectively as Equal Employment Opportunity ("**EEO**") or Equal Opportunity ("**EO**") laws.

They include:

- Laws that make it unlawful to discriminate against a person on certain prohibited grounds. (e.g. gender, age, race and religion).
- The Workplace Gender Equality Act 2012 (Cth) which requires employers, with 100 or more employees, to develop a workplace program designed to eliminate discrimination against women and promote equal opportunity for women in the workplace.

In addition, the ASX Listing Rules and ASX Corporate Governance Principles and Recommendations require ASX listed entities to:

- (Recommendation 1.5(a)) Have and disclose a diversity policy
- (Recommendation 1.5(b)) through its Board of Directors (or a relevant committee of the Board):
 - set measurable objectives for achieving greater gender diversity of its board, senior executives and workforce generally
- (Recommendation 1.5(c)) disclose in relation to its reporting period the measurable objectives for achieving gender diversity, progress towards those objectives and the respective proportion of men and women on the Board, 'senior executive' positions and across the whole organisation (including how the entity has defined 'senior executive' for these purposes.

4. Benefits of diversity in the workplace

The benefits of implementing this Policy and maintaining diversity and inclusion in the Group include:

1. Development of Human Capital
 - Strengthening organisational and human capital by recruiting people from different backgrounds and social networks;
 - Strengthening cultural values by encouraging a broader range of views and opinions;
 - Improving innovation and creativity amongst employees;
 - Providing staff with exposure to people with different ways of thinking and a range of different life experiences; and
 - Utilising untapped resources including language skills, social and business networks.
2. Increased Productivity & Financial Performance
 - Better financial performance; and
 - Improving staff morale by encouraging tolerance and understanding.
3. Customer Service
 - Developing our capacity to deal with all sections of the community; and
 - Improving customer service by gaining a better understanding of customer needs.
4. Corporate Reputation
 - Enhancing our corporate reputation as an employer; and
 - Gaining goodwill in the community.
5. Compliance
 - Compliance with a range of legal and regulatory obligations.

4. Promoting Diversity and Inclusion

The Board together with the Executive Chairman and senior management of the Group are committed to developing a corporate culture that values and promotes workforce diversity, flexibility and inclusion.

This commitment is demonstrated by the following measures that have been established and implemented within the Group:

- This Diversity Policy;
- A Code of Conduct;
- Clear articulation of company and required standards of behaviour that support diversity;
- An Equal Employment Opportunity and Harassment Policy;
- An Internal Grievance Resolution process which is designed to establish a consistent approach in dealing with conflicts in the workplace, internal complaints about the work environment, as well as issues of misconduct or poor performance;
- A Human Resources Program which includes policies designed to let parents balance their work, life and family responsibilities;
- Flexible Working Arrangements;
- Employee Assistance Program;
- Employee Pulse/Opinion survey;
- Remuneration review;
- Recruitment practices that ensure all employment decisions are based on business needs, job requirements and individual qualifications; and
- Targeted training relating to diversity

Further, in order to facilitate greater diversity and inclusion in management and leadership roles*, the Group has taken the following specific measures at a Group and Board level respectively:

- a Board Charter that requires the full Board to consider diversity issues in the Board selection process and review, at least annually, the relative proportion of women and men at all levels of the organisation, in particularly those in leadership roles*;
- setting measurable objectives for achieving gender diversity on the Board and those in leadership roles;
- reviewing the progress that has been made towards achieving the measurable objectives; and
- reporting to the Board on the Group's implementation of the diversity strategy; and
- Board and Committee performance evaluation procedures which include consideration of the Board's management of the diversity strategy.

** The Company defines an employee in a leadership role as someone who has specialist skills and senior standing who either reports directly to the CEO or reports to a person directly reporting to the CEO.*

5. Administering this Policy

Responsibility for administering the Company's Diversity Policy has been delegated to the Head of Human Resources.

It is the responsibility of this role to:

- assist the Board and senior management with diversity issues;
- develop and maintain a diversity policy and strategy which is suitable to an organisation of the size, nature and complexity of the Company;
- collect and analyse data with respect to diversity within the Group;

- oversee the implementation and execution of this Diversity Policy;
- recommend measurable objectives for achieving gender diversity and monitor these objectives;
- provide training to the Board, senior management and staff with respect to diversity issues;
- promote a culture of diversity;
- review existing policies and procedures with regard to diversity objectives; and
- report to the Board and management on diversity issues.

6. Establishing Measurable Objectives for Achieving Gender Diversity

Measurable Objectives

The Group has identified the following types of measurable objectives to assist in achieving gender diversity:

- Implementation of programs / initiatives designed to enhance gender diversity (e.g. employee surveys, mentoring programs, specific training);
- Introduction of procedural / structural objectives (e.g. enhance reporting processes, introduction of a third party to assist in Director interviews and selection); and
- The establishment of targets (as set out under the Corporate Governance Statement) for gender diversity at the following three levels of the organisation:
 - Board
 - Executive and Leadership Roles
 - Staff.

Gender representation and objectives review

An assessment with respect to current gender diversity levels and company initiatives is undertaken at least once every 12 months providing data from which measurable objectives for gender diversity can be established. The results of progress as well as the proportion of women employees in the whole organisation, women in leadership roles and women on the Board disclosed in our annual report or Corporate Governance Statement.

7. Review of this Policy

The Board is responsible for the review and oversight of this Policy. Management will periodically:

- review:
 - the effectiveness of this Policy, its objectives and the strategies to achieve the objectives; and
 - the division of responsibilities and accountability for developing and implementing diversity initiatives across the organisation; and
- report to the Board on the outcomes of its review, including any recommendations for changes to those strategies or the way in which they are implemented.

Effective Date: 29 October 2020