

Diversity Policy

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Diversity Policy

1 Purpose of this Policy

The APN Group (APN) is committed to fostering a culture and workplace throughout all levels of the organisation (including through the board level, senior management level and employee level) that promotes diversity and inclusion. Diversity includes embracing, encouraging, respecting and valuing the contribution and differences of all APN Staff irrespective of personal characteristics including gender, age and ethnicity, as well as individual values, beliefs, cultures, experience and background. APN promotes diversity and inclusion through its values, culture and ongoing commitment through board and leadership behaviour.

2 Corporate Benefits of Diversity

APN believes that there are a number of corporate benefits to be derived by the APN Group in fostering, achieving and maintaining a diverse and inclusive workplace. These benefits include:

- ensuring that a range of different perspectives can be brought to the table from all levels of the organisation when reviewing and considering issues within the APN Group;
- finding new and innovative solutions for the benefit of APN and its investors;
- assisting with employee retention and employee engagement strategies (including by enabling APN to attract, retain and motivate APN Staff from a wide pool of talented candidates in a competitive market);
- enabling APN to connect more effectively with its entire network of investors, advisers, business stakeholders and others within the investment community; and
- supporting APN's goal to continually improve its overall governance practices as a socially responsible fund and investment manager.

3 Diversity Objectives

APN's diversity objectives include;

- Promoting a workplace culture that values and supports diversity, inclusion and flexibility; and
- Increasing the composition of diversity in its workplace at all levels of the organisation, including in gender equality and other diversity characteristics.

4 Areas of Focus

APN achieves its diversity objectives by continually promoting the following areas and practices across the business;

- **Leadership accountability**

The board and senior management are responsible for encouraging and embracing diversity and inclusion throughout the business in line with APN's values and practices. APN's Values can be found on the APN Group website (www.apngroup.com.au/about-us). APN through its leadership team are committed to identifying and eliminating practices, procedures or behaviours which may unconsciously impede achievement of APN's diversity objectives.

- **Inclusive Culture**

APN is committed to creating a workplace culture where people with diverse backgrounds, skills

and experience have an opportunity to participate and express constructively their points of view. This includes through emails, meetings and staff updates, that allow APN staff at all levels the opportunity to contribute. All APN Staff regardless of seniority are responsible for conducting themselves in a professional and non-discriminatory way.

- **Recruitment and Promotion**

APN recruits and promotes individuals based on merit, performance and capability. Employing the right people for the right job is critical to APN being able to meet its business objectives. The selection process for all appointments (including at board level, senior management level and employee level) will have regard for the need to maintain an appropriate mix of skills, experience, expertise and diversity and therefore, will consider at least one female candidate wherever reasonable possible.

- **Parental leave and Flexible work arrangements**

APN provides 8 weeks paid parental leave to the primary carer and two week's paid leave to the secondary carer, to support employees during this time in their life. Where appropriate, APN will also provide opportunities for employees on extended parental leave to maintain their connection with APN, such as by including them in appropriate APN Staff correspondence, events and training programs.

APN will also consider flexible work arrangement for any APN Staff (regardless of their gender or other characteristics) who request such arrangements, to balance family and other commitments with the role. Requests will be considered on a case by case basis and approved where the role permits such arrangements.

- **Governance policies**

APN has zero tolerance towards discrimination, harassment, vilification and victimisation in the workplace, any APN Staff that engage in such conduct may be subject to disciplinary action or dismissal. All APN Staff are expected to fully understand APN's Code of Conduct and their broad obligations under other APN Governance Policies (including the APN Staff Handbook, as amended from time to time). APN's Governance Policies are available to all APN Staff via APN's intranet. All APN Staff are made aware of any key changes to policies. APN Staff are required to confirm that they have read and understood APN's Governance Policies on an annual basis. APN will also provide ongoing training periodically on key obligations under its governance policies.

- **Performance and Remuneration**

APN aims to conduct performance reviews for all APN Staff on an annual basis. Performance reviews are a two-way conversation between APN Staff and their Manager and a means to measure performance against agreed objectives. APN encourages APN Staff to have regular catch-ups with their Manager to ensure matters are dealt with promptly and not left to formal review periods. Any remuneration changes and discretionary bonuses payments consider individual performance and market guidance to ensure there is no unconscious gender pay inequality.

- **Learning and Development**

APN is committed to supporting APN Staff reach their full capabilities, and recognises the importance of developing skilled, experienced and diverse employees. APN Staff who wish to enhance their qualifications in their work and role related field via additional education should discuss the request with their Manager. APN will give due consideration to any studies that will provide a mutual benefit to the staff member and to APN. APN may also make available development programs to specific staff members as part of its broader succession plan.

5 Listed Entities

In line with the ASX Corporate Governance Principles and Recommendations, APN is committed to considering a range of diversity principles periodically and setting appropriate measurable objectives for achieving gender diversity in the composition of its board, senior management and the broader workplace. APN's progress towards its diversity objectives will be disclosed in the Corporate Governance Statement published on the ASX and APN's Group website for the respective listed entity on an annual basis.

For any entity in the APN Group who was in the S&P/ASX 300 Index at the commencement of the reporting period, the gender diversity objective for achieving gender diversity in the composition of its board will be no less than 30% of its directors for each gender.

6 Disclosure of this Policy

This policy will be published on APN Group's website (www.apngroup.com/about-us/governance), or other such page as APN Group deems appropriate.

7 Questions

If any member of APN Staff has any questions or concerns from time to time about the subject matter or requirements of this policy, that person should contact their Manager in the first instance.

8 Changes to Policy

APN will review this policy periodically to ensure it remains appropriate to the legal and regulatory framework in which APN operates. Any changes will be communicated to APN staff and/or posted on APN's intranet site and/or website (as deemed appropriate).

9 Definitions

In this policy, unless the context otherwise requires:

APN FM means APN Funds Management Limited.

APN Group or APN means APN PG and any of its controlled or related entities, including APN FM and APN RE.

APN PG means APN Property Group Limited.

APN RE means APN RE Limited.

APN Staff means and includes any director, officer, senior manager or other employee of APN PG, APN FM or APN RE and any other employee of or consultant to an APN Entity as designated by the board of APN PG, APN FM or APN RE.

ASX means the Australian Securities Exchange.

ASX Corporate Governance Principles and Recommendations means the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

Board means the board of directors of APN PG.