

Diversity, Equity, and Inclusion Policy

Operational Policy

Version: 7.0

Approval date: 16 March 2023

Effective date: 16 March 2023

CONFIDENTIAL

Table of Contents

Policy Overview.....	3
1. Introduction.....	3
2. Policy.....	3
3. Objectives.....	4
4. Legal Requirements.....	5
5. Recruitment, Selection and Promotion.....	5
6. Learning and Development.....	6
7. Flexible Work Arrangements.....	6
8. Performance Reviews.....	6
9. Restructures and Significant Operational Changes.....	6
10. Respect for Diversity.....	6
11. Gender Equality.....	7
12. Cultural diversity.....	7
13. Monitoring and Reporting.....	7
14. Reviews.....	8
Document information.....	9
1. Version history.....	9
2. Reference documents.....	9

Company information table

Confidentiality and Copyright

© Copyright 2022 Helia Group Limited (Helia). All rights reserved. This document is confidential. No part of this document may be reproduced in any form or by any means, or provided to any third party, without the express written permission of Helia. Helia, Helia Financial and the Helia logo are registered service marks of Helia Financial, Inc.

References within this document

Within this document, a reference to Helia or 'the Company' refers to Helia Group Limited and its subsidiary companies.

References to the Board are to the Boards of Directors of Helia and its subsidiary companies unless a specific Board is specified. All References to amounts are in Australian Dollars (AUD).

CONFIDENTIAL

Policy Overview

1. Introduction

- 1.1 This Diversity, Equity and Inclusion Policy is applicable to Helia Mortgage Insurance Australia Limited, Helia Financial Mortgage Insurance Pty Limited and Helia Financial Mortgage Indemnity Limited, (together the **Company**).
- 1.2 This is a policy approved by the Board of the Company (the **Board**) in relation to promoting and maintaining diversity and inclusion in the Company. This policy applies to all current and prospective employees (including employees on casual or maximum-term contracts), independent contractors, senior executives, directors and officers of the Company.
- 1.3 The Remuneration and Nominations Committee is responsible for overseeing implementation of this Policy and for ensuring that the Policy applies to identifying and selecting new Directors.
- 1.4 The Chief Executive Officer of the Company is accountable to the Remuneration and Nominations Committee for ensuring this policy is implemented throughout the company's workforce. Senior executives and all employees involved in recruitment, promotion, career development, responding to flexible work requests and operational change are expected to ensure this policy is implemented and integrated into all activities of the Company.
- 1.5 This policy does not replace or limit the Company's obligations under equal employment opportunity and anti-discrimination legislation. This policy does not authorise or require any departure from the Company's obligations under this legislation. This Policy is not a term of any contract, including any contract of employment and does not impose any contractual duties, implied or otherwise, on the Company.

2. Policy

- 2.1 The Company recognises that a talented and diverse workforce operating in an inclusive environment is a key competitive advantage and the Company's success is a reflection of the quality and skills of its people.
- 2.2 The Company is committed to promoting a workplace that recognises and embraces the skills, characteristics and experiences that people bring to the Company through, among other things, age, caring responsibilities, cultural diversity, disability, gender, Indigeneity, sexual orientation, gender identity and religion.
- 2.3 The Company strives to create an inclusive environment based on mutual respect, which creates a sense of belonging and allows everyone to fulfil their potential.
- 2.4 The Company recognises the many benefits arising from workplace diversity and inclusion. Drawing our workforce from a diverse candidate pool allows us to recruit the best talent to improve our business performance and deliver our strategy. The promotion of diversity and inclusion encourages greater innovation, improves the Company's corporate image and reputation, enhances employee engagement and retention, and creates value for our customers and shareholders and other stakeholders.
- 2.5 The Company recognises that a diverse and inclusive workforce is a key means to achieving innovation. To continue to be relevant, adaptive and innovative, the Company recognises the need to leverage the

CONFIDENTIAL

full potential of its people. A culture that embraces individual differences will enable the Company to do this through diversity of thought.

- 2.6 The Company defines diversity as all the characteristics that make individuals different from each other. Diversity is the result of commitment to equality and treating all individuals – employees, workers, clients and the communities in which the Company operates – with respect.
- 2.7 The Company defines inclusion as the act of creating workplace environments in which any individual or group feels welcomed, respected and valued to fully participate and contribute. Inclusive workplace environments incorporate new and different ways of thinking, interacting and working into the way business is done so that all individuals are able to contribute to the organisation. From this perspective, diversity is seen as giving rise to different life experiences, knowledge, and insights, which can be used to generate alternative views about work and how best to accomplish it.

3. Objectives

- 3.1 The objectives of this policy are to:
- (a) Identify and remove any barriers to diversity which may exist within the Company to create a workplace culture of inclusion;
 - (b) Appreciate and respect the unique diversity that each individual brings to the workplace;
 - (c) Actively promote a culture of respect, trust and empowerment;
 - (d) Actively monitor and report on recruitment, promotions and turnover, particularly in relation to gender diversity, to attract and retain a skilled and diverse workforce;
 - (e) assist the Company to meet its obligation to eliminate and minimise risks to health and safety, as far as reasonably practicable, including psychosocial risks (such as discrimination, bullying and harassment) including by taking action against inappropriate workplace behaviour in accordance with the Company's Code of Conduct and Workplace Standards Policy;
 - (f) assist the Company to meet its obligations under anti-discrimination legislation including to take reasonable and proportionate measures to eliminate unlawful discriminatory conduct (including sexual harassment) by staff and protect staff from unlawful discriminatory conduct, as far as possible;
 - (g) Facilitate equal employment opportunities based on an unbiased view of ability, performance and potential;
 - (h) Develop flexible work practices to meet the different needs of our employees;
 - (i) Maximise customer service and market reputation by developing a workforce that respects and reflects the diversity of our customers and shareholders;
 - (j) Make diversity and inclusion central to the way in which the Company and employees work;
 - (k) Undertake diversity and inclusion initiatives and measure their effectiveness;
 - (l) Promote diversity and inclusion through the Company's actions and interactions; and
 - (m) Provide diversity and inclusion in education, training and mentoring programs.

CONFIDENTIAL

4. Legal Requirements

- 4.1 This policy has been developed to ensure compliance with the requirements of the applicable Federal and State/Territory legislation, including:
- (a) Australian Human Rights Commission Act 1986;
 - (b) Age Discrimination;
 - (c) Sex Discrimination Act;
 - (d) Racial Discrimination Act;
 - (e) Disability Discrimination Act;
 - (f) Workplace Gender Equality Act;
 - (g) Fair Work Act 2009;
 - (h) Work Health and Safety Act 2011;
 - (i) Workplace Health and Safety legislation applicable to each State or Territory in which the Company operates; and
 - (j) Anti-discrimination legislation applicable to each State or Territory in which the Company operates
- 4.2 The principles outlined in this policy operate in conjunction with and should be read alongside our Workplace Standards and Recruitment Policies and all other policies applicable to promoting the principles of this policy. These policies can be found in People and Culture Policies Folder within the Operations and Controls Framework Folder on your desktop.

5. Recruitment, Selection and Promotion

- 5.1 The Company is committed to ensuring that recruitment, selection and promotion processes at all levels in the Company, including at the Board level, are designed to support a workplace which values diversity and avoids unlawful discrimination.
- 5.2 The Company aims to ensure that:
- (a) its recruitment, selection and promotion is based on merit and that suitable candidates who could bring a variety of different styles, skills and experience to the organisation are objectively assessed.
 - (b) it complies at all times with anti-discrimination legislation by ensuring candidates are not discriminated against, or treated less favourably, on unlawful grounds such as age, race, sex, gender identity or sexual orientation. If the best candidate has a disability the Company will consider what reasonable adjustments it can make to assist the candidate to perform the job. An adjustment is not reasonable if it would cause an unjustifiable hardship;
 - (c) it values and promotes the principles of equal employment opportunity in respect of all recruitment, selection and promotion decisions. This includes by seeking to promote gender balance and diversity;
 - (d) it educates managers involved in recruitment, selection and promotion on the value of workplace diversity and the role bias (including unconscious bias) can play in recruitment, selection and promotion decisions; and

CONFIDENTIAL

- (e) its recruitment processes are accessible to potential candidates by advertising positions broadly (including internally in accordance with the Recruitment Policy), avoiding gendered wording and by using professional recruitment agencies where required.

6. Learning and Development

- 6.1 The Company promotes career development and learning opportunities based on relative ability, performance and potential, recognising the different capabilities diverse groups bring to the organisation.
- 6.2 The Company supports and encourages the personal and professional development of all its employees. The Company aims to ensure that it provides learning and development opportunities in a way which maximises fair and equitable access to all employees and enables all employees to experience the benefit of a diverse and inclusive environment.

7. Flexible Work Arrangements

- 7.1 The Company endeavours to support the work-life balance and flexibility needs of its employees. The Company recognises that flexible work arrangements can reduce absenteeism and increase employee engagement and retention.
- 7.2 The Company offers a range of flexible working arrangements, subject to meeting the reasonable needs of the business, including part time work, job share arrangements and flexible working hours.

8. Performance Reviews

- 8.1 The Company is committed to reviewing performance in a way that promotes leadership, accountability and equal opportunity. The Company will ensure that:
 - (a) it has clear, objective and well documented processes in relation to performance review and management; and
 - (b) that all performance review decision makers are aware of their responsibilities in relation to equal opportunity, diversity and unlawful discrimination.

9. Restructures and Significant Operational Changes

- 9.1 The Company will ensure that any significant operational changes, including redundancies will be executed in line with a clear, objective and well documents process and that all operational change decision makers are aware of their responsibilities in relation to equal opportunity, diversity and unlawful discrimination

10. Respect for Diversity

- 10.1 The Company will also take reasonable and proportionate measures to eliminate unlawful discriminatory conduct, harassment and victimisation, and provide people with equality of opportunity to make a contribution. The Company is also committed to preventing workplace bullying, as far as reasonably practicable, as part of providing a safe and healthy work environment.
- 10.2 The Company will:

CONFIDENTIAL

- (a) provide leaders with information and training about unlawful discrimination, harassment and bullying and encourage leaders to model and enforce inclusive and appropriate workplace behaviour;
- (b) provide support and education to all employees about how to prevent, intervene and respond to inappropriate behaviour;
- (c) have gender equality and other inclusivity strategies to reduce the occurrence of unlawful discrimination, harassment and bullying;
- (d) take proportionate action when unlawful discrimination, harassment and/or bullying is found to have occurred.

11. Gender Equality

- 11.1 The Company is committed to promoting gender equality in the workplace which is enabled through:
- (a) providing employees of all genders access to equal opportunities and outcome across all areas of the business;
 - (b) removing barriers to the full and equal participation of women in the workforce;
 - (c) providing full and genuine access to all occupations, including to leadership roles, for women and men;
 - (d) driving a culture where rewards are directly linked to employee contributions and performance; and
 - (e) take reasonable and proportionate measures to eliminate unlawful discriminatory conduct (including sex-based discrimination and harassment and sexual harassment) by staff and protect staff from unlawful discriminatory conduct, as far as possible.

12. Cultural diversity

- 12.1 The Company is committed to promoting cultural diversity in the workplace which is enabled through:
- (a) building cultural awareness including by recognising and/or celebrating cultural and religious festivals with employees;
 - (b) taking action in accordance with the Company's Reconciliation Action Plan to progress its awareness, actions and approach to Reconciliation;
 - (c) better understanding the diverse demographic make-up of our workforce through confidential surveys so that diversity initiatives can be better focused to the needs of the workforce.

13. Monitoring and Reporting

- 13.1 The Board, in consultation with the Remuneration and Nominations Committee and management (where appropriate), is responsible for overseeing the implementation and monitoring of this policy, and must, in particular:
- (a) establish measurable objectives for achieving gender diversity;

CONFIDENTIAL

- (b) review those objectives annually; and
 - (c) assess annually the progress in achieving those objectives and the effectiveness of this policy.
- 13.2 The Board will ensure that appropriate disclosures are made in annual reports regarding gender diversity in the Company, including information regarding the proportion of women in the Company, women in senior executive positions and women on the Board.

14. Reviews

- 14.1 The Board will review the Company's diversity strategy as part of the Company's broader business strategy. The Board will review the Company's diversity objectives annually and will monitor progress towards the achievement of those measurable objectives. This policy will be reviewed regularly and updated as required.

CONFIDENTIAL

Document information

1. Version history

Version	Approved date
1.0	26 February 2014
2.0	13 March 2014
3.0	11 December 2014
4.0	25 January 2017
5.0	24 October 2018
6.0	07 October 2020
7.0	16 March 2023

2. Reference documents

The following documents have been referenced in the preparation of this policy.

Ref.	Document name	Business owner
1	Charter - Remuneration and Nominations Committee	Remuneration and Nominations Committee
2	Workplace Standards Policy	Chief People and Culture Officer
3	Recruitment Policy	Chief People and Culture Officer
4	Diversity, Equity and Inclusion Strategy	Chief People and Culture Officer

CONFIDENTIAL