

Inclusion & Diversity Policy

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Netwealth Group Limited

Approved and adopted by:

- Netwealth Group Limited (ACN 620 145 404) (**NWL**) on 27 November 2024
- Netwealth Group Services Pty Ltd (**NGS**) (ABN 89 135 940 840) on 27 November 2024

Document classification: General Use.

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Document Control:

Document Owner	Chief People Officer
Frequency of review	Annually
Date of next internal review	November 2025
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 and its subsidiaries (**collectively referred to as Netwealth**) 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 Netwealth's policy 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:

- Promote and uphold the Netwealth Values;
- Set the vision and Diversity Objectives for our Inclusion and Diversity Strategic Roadmap;
- Approve the frameworks and set the 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 Scope

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 and Netwealth Group Services Pty Ltd Board(s) ((the Board(s)))	<ul style="list-style-type: none"> Review and approve the Policy; Set the vision and Diversity Objectives for the Policy; Approve the frameworks and set the targets and metrics for achieving the Diversity Objectives; Disclose the relevant metrics set for the reporting period and Netwealth’s progress in achieving the objectives in Netwealth’s Corporate Sustainability Report; Monitor overall compliance with this Policy; and Promote and uphold the Netwealth Values;
Netwealth People and Corporate Sustainability Committee (PCSC)	<ul style="list-style-type: none"> Review and endorse the Policy to the Board for approval; Assess the established objectives, targets and metrics annually to monitor Netwealth’s progress in achieving these; Monitor compliance with the Policy and report risks and issues to the CRMC; 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 (RemCo)	<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 consider where action may be required; and Give consideration to inclusion and diversity in assessing remuneration policies and frameworks
Netwealth Compliance and Risk Management Committee (CRMC)	<ul style="list-style-type: none"> Provide oversight of the Risk Management Framework; including regular review and monitoring of its effectiveness.
Chief People Officer (CPO)	<ul style="list-style-type: none"> Recommend updates and amendments to this Policy to the PCSC for endorsing to the Board; Provide recommendations to the PCSC on frameworks, metrics and targets that will achieve the Diversity Objectives; Provide regular reporting to the PCSC on progression against the objectives, frameworks, targets and metrics that have been set to achieve the Diversity Objectives, Provide WGEA reporting to the PCSC and RemCo on the gender pay gap, and the initiatives under each of the Gender Equity Indicators, as defined in the Workplace Gender Equality Act 2012 (Cth); Create and maintain internal frameworks that identify risks, hazards and outline appropriate controls that are relevant to this Policy, as outlined in the Legislative Framework;

Roles	Responsibilities
	<ul style="list-style-type: none"> Regularly review relevant internal management standards, roadmaps and procedures to see that they continue to align to this Policy; Provide relevant learning and development to Employees to meet compliance requirements under the Legislative Framework of this Policy; Promote compliance of this Policy; and Overall accountability for the communication and implementation of this Policy.
Chief Risk, Legal and Governance Officer (CRLGO)	<ul style="list-style-type: none"> Regularly review and monitor the effectiveness of the Risk Management Framework
Chief Financial Officer (CFO)	<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. Add to the company culture by demonstrating and leading to the Netwealth values and the ways of working.
Employee(s)	<ul style="list-style-type: none"> Know, understand, and comply with Netwealth policies, management standards and procedures concerning inclusion and diversity, including this Policy; 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.

1.4 Definitions

The following table sets out the definitions from the Netwealth Glossary used in this Policy

Term	Definition
Diversity	<ul style="list-style-type: none"> Diversity includes but is not limited to gender, age, race, ethnicity, disability, marital status, family responsibilities, religion, cultural background, sexual orientation, and gender identity
Diversity Objectives	<ul style="list-style-type: none"> The Diversity Objectives are: <ul style="list-style-type: none"> Maintaining and building on our inclusive culture, where our people feel 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;

Term	Definition
	<ul style="list-style-type: none"> - 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; and - Monitoring and measuring the achievement of all Diversity Objectives set by the Board. <ul style="list-style-type: none"> • that Netwealth commit to achieving under this Policy .
Employee	<ul style="list-style-type: none"> • Means permanent employees, including managers and supervisors; full time or part time and temporary (casual) employees, of relevant Netwealth entities.
Inclusion ¹	<ul style="list-style-type: none"> • Inclusion refers to getting the mix of people in an organisation to work together to improve performance and wellbeing. Inclusion in a workplace is achieved when a diversity of people feel that they are: <ul style="list-style-type: none"> ○ Respected for who they are and able to be themselves; ○ Connected to their colleagues and feel they belong; ○ Contributing their perspectives and talents to the workplace; and ○ Progressing in their career at work (i.e. have equal access to opportunities and resources).

2 Commitment to diversity

Netwealth is committed to:

- Maintaining and building on our inclusive culture, where our people feel 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; and
- 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-

¹ Diversity Council Australia, Inclusion Model, Sydney, Diversity Council Australia, 2017

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 Employees, and publicly on its website.

Document Version Control Table

Version	Comment	Approver(s)	Date
V 1.0	<ul style="list-style-type: none">Document created and approved	Netwealth Board	29 November 2023
V 2.0	<ul style="list-style-type: none">Updates to Policy mainly relating to Roles and ResponsibilitiesInclusion of Definitions tableInclusion of Document Control table	Netwealth Board	27 November 2024