

# Policy – Diversity (Global)

**Navitas Limited**  
ACN 109 613 309

## Document

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Responsibility	Group General Manager, Human Resources
Initial Issue Date	20 March 2012

## Version Control

Issue Date:	Summary of Changes	Review Date
20 March 2012	Initial release of policy	March 2014

## PURPOSE AND SCOPE

This Policy sets out the Company's policy in relation to promoting and maintaining diversity.

This Policy was adopted by the Board on 20 March 2012.

## POLICY

### 1. Application

- 1.1 This is a Policy of the Board. This Policy applies to all employees, Directors, senior executives and officers of the Company.
- 1.2 The NRC is accountable to the Board for ensuring this Policy is implemented in respect of the Board and the process for identifying and selecting new Directors.
- 1.3 The Managing Director of the Company is accountable to the Board for ensuring this Policy is implemented throughout the Company's workforce. Senior executives and all personnel involved in recruitment are expected to ensure this Policy is implemented and integrated into all activities of the Company.
- 1.4 This Policy does not replace or limit equal employment opportunity and anti-discrimination regulatory requirements or authorise or require any departure from them.

### 2. Policy

- 2.1 The Company recognises that a talented and diverse workforce 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.
- 2.3 The Company recognises the many benefits arising from workplace diversity. Drawing our workforce from a diverse pool allows us to recruit the best talent to improve our business performance and deliver our strategy. The promotion of diversity encourages greater innovation, defines the Company's corporate image and reputation, enhances employee engagement and retention, and creates value for our students, customers and shareholders and other stakeholders.

### 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 monitor recruitment, promotions and turnover, particularly in relation to gender diversity;
- (d) create and maintain a safe work environment by taking action against inappropriate workplace behaviour (such as discrimination, bullying and harassment);
- (e) facilitate equal employment opportunities based on ability, performance and potential;
- (f) attract and retain a skilled and diverse workforce;
- (g) develop flexible work practices to meet the different needs of our employees;
- (h) maximise student and customer service and market reputation by developing a workforce that respects and reflects the diversity of our students, customers and shareholders;
- (i) ensure the Company has clear reporting processes and procedures in place;
- (j) undertake diversity initiatives and measure their effectiveness;
- (k) promote diversity through the Company's actions and interactions; and
- (l) provide diversity education, training and mentoring programs.

#### **4. Recruitment and Selection**

- 4.1 The Company will ensure 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 unfair discrimination.
- 4.2 The Company will ensure that:
  - (a) recruitment and selection is based on merit;
  - (b) the Company complies at all times with equal employment opportunity and anti-discrimination requirements;
  - (c) the Company encourages management involved in recruitment to consider workplace diversity when making selection decisions; and
  - (d) the Company aims to make its recruitment process accessible to all candidates by advertising positions broadly and by using professional recruitment agencies where required.

#### **5. Career Development and Promotion**

- 5.1 The Company supports and encourages the personal and professional development of all employees in accordance with the Company's strategies and business objectives.
- 5.2 The Company promotes career development and promotion opportunities based on ability, performance and potential.

## 6. Flexible Work Arrangements

- 6.1 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, increase employee engagement and retention.
- 6.2 The Company offers a range of flexible working arrangements, subject to meeting the needs of the business, including part time work, job share arrangements, flexible working hours and working from home.

## 7. Learning and Development

- 7.1 The Company recognises that employees have individual needs regarding their learning and development. The Company will ensure that appropriate learning and development opportunities are provided in a way that maximise fair and equitable access to all employees and that all employees are aware of their responsibilities in relation to equal opportunity and diversity in accordance with the Company's strategies and business objectives.

# RESPONSIBILITIES

**Group General Manager, Human Resources** is accountable for the ongoing development, approval, implementation, awareness and effectiveness of this Policy and the supporting processes and documentation.

**GLT members** are responsible for ensuring that all Business Unit Managers are aware of this Policy and their responsibilities defined herein.

**Business Unit Managers** are responsible for ensuring that all employees are aware of this Policy and their responsibilities defined herein.

**Navitas employees** are responsible for being aware of, and complying with this Policy.

# DEFINITIONS

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

**Business Unit Manager** means the Divisional Executive General Manager, Group General Manager or Managing Director of the relevant Company operational area (as appropriate to that division).

**Board** means the board of directors of the Company.



**Company** means Navitas Limited ACN 109 613 309 having its registered office at Level 2, Kirin Centre, 15 Ogilvie Road, Mt Pleasant WA 6153.

**Director** means a director on the Board.

**GLT** means the Group Leadership Team of the Company.

**NRC** means the Nomination and Remuneration Committee of the Company.

## **REVIEW**

The Board will review the Company's diversity strategy annually and will monitor progress towards the achievement of measureable objectives. This Policy will be reviewed regularly and updated as required.

## **RELATED DOCUMENTS**

Diversity Strategy Document.