
Diversity Policy

Date: 18 September 2019

Document Status: Published

Classification: External

Diversity Policy

Bravura Solutions Limited and its subsidiaries (the Company)

1. Background

1.1 Overview

The Company is a forward thinking and dynamic organisation that holds its people in the highest esteem and considers them to be its greatest asset.

The Company's workforce is made up of many individuals with diverse skills, values, experiences, backgrounds and attributes including those gained on account of their gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation and gender identity.

1.2 Diversity Policy Statement

The Company's values are collaboration, diversity and excellence. In particular, the Company values and is proud of its strong and diverse workforce and is committed to supporting and further developing this diversity through attracting, recruiting, engaging and retaining diverse talent and aligning the Company's culture and management systems with this commitment.

The Company believes that such a commitment to diversity creates competitive advantage and enhances employee participation, and in this way is essential to the organisation continuing to succeed and grow strong. The Company's values statement emphasises that it is through diversity comes the ability to innovate and that all employees should treat each other respectfully and value the diversity of backgrounds, strengths, experience and ideas.

2. Key Principles

2.1 Strategies

The Company is committed to providing and promoting a corporate culture which embraces diversity in line with the Diversity Policy Statement, and aims to do so via:

- a) promoting the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements;
- b) having an overall transparent process for the review and appointment of senior management positions and the Company's board of directors (Board) members;
- c) recruiting from a diverse pool of qualified candidates, ensuring that recruitment and selection practices at all levels (from the Board downwards) are appropriately structured so that a diverse range of candidates are considered and guarding against any conscious or unconscious biases that might discriminate against certain candidates, including where appropriate engaging a professional search / recruitment firm, advertising vacancies widely, making efforts to identify prospective employees who have diversity attributes and ensuring diversity of members on the selection / interview panel when selecting and appointing new employees (including senior management) and new Board members;
- d) embedding the importance of diversity within the Company's culture by encouraging and fostering a commitment to diversity by leaders at all levels whilst recognising that diversity is the responsibility of all employees;
- e) recognising that employees (male and female) at all levels may have family or other domestic responsibilities and adopting flexible work practices that will assist them to meet those responsibilities;
- f) providing opportunities for employees on extended parental leave to maintain their connection with the Company, for example, by offering them the option (without any obligation) to receive all-staff communications and to attend work functions and training programs;

- g) committing to inclusion at all levels of the Company, regardless of gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, cultural background, socio-economic background, perspective and experience;
- h) designing and implementing programs that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare them for senior management and board positions;
- i) reinforcing with our people that in order to have a properly functioning and diverse workplace, discrimination, harassment, vilification and victimisation will not be tolerated within the Company; and
- j) continuing to review and develop policies and procedures to ensure diversity within the organisation, including with the adoption of key performance indicators for senior executives to measure the achievement of diversity objectives under the Company's diversity policy.

2.2 Key Initiatives and Programs

The Company also aims to introduce and / or maintain the following programs and initiatives to assist with improving diversity within the organisation:

- a) mentoring programs;
- b) career opportunity and targeted professional development programs including those aimed at helping employees develop skills and experience in preparation for senior management and board positions;
- c) work life balance policies including flexible work options, access to childcare facilities, return to work programs and the like; and
- d) networking opportunities.

2.3 Measurable Objectives

The Company will set and implement measurable objectives to achieve gender diversity.

Management will develop, for approval by the Board or its relevant sub committee, as appropriate the measurable objectives.

At least annually, management will monitor, review and report to the Board (including via the Remuneration & Nomination Committee) on the achievement of these matters, gender diversity and the Company's progress under this policy more broadly, including any appropriate benchmarking against other comparable businesses.

2.4 Communication

In order to promote transparency and accountability and to further the objectives of this policy the Company will:

- a) post a copy of this policy or a summary of it on its website; and
- b) disclose a copy of the policy or a summary of it in the Company's annual report.

2.5 Compliance Requirements

The Company is committed to meeting its obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (4th Edition) (ASX Recommendations) and any other applicable regulatory requirements, including by:

- a) establishing and disclosing this policy, for example and including on the Company's website and in its annual report (pursuant to ASX Recommendation 1.5(a));
- b) through its Board or a committee of the Board, setting measurable objectives for achieving gender diversity in the composition of the Board, senior executives and workforce generally (pursuant to ASX Recommendation 1.5(b));
- c) disclosing in relation to each report period the measurable objectives set for that period to achieve gender diversity and the Company's progress in achieving them, for example and including in its annual report (pursuant to ASX Recommendation 1.5(c); and

- d) setting a measurable objective to have no less than 30% of the Company's directors of each gender in the composition of the Board (including both executive and non-executive directors) within a specified period if the Company is in the S&P/ASX 300 Index at the commencement of a relevant reporting period (pursuant to ASX Recommendation 1.5).

The Company Secretary is responsible for ensuring that the Company meets its compliance and reporting obligations referred to above.

2.6 Responsibilities

The Board is ultimately accountable for this policy.

The Managing Director/CEO and members of the leadership team are responsible for the implementation of this policy and monitoring compliance with it, with the Company Secretary being responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant Board committee as appropriate).

3. Other matters

3.1 Overriding principles

Nothing in this policy will be taken, interpreted or construed so as to endorse:

- a) the principal criteria for selection and promotion of people to work within the Company being other than their overall relative prospect of adding value to the Company and enhancing the probability of achievement of the Company's objectives;
- b) any discriminatory behaviour by or within the Company contrary to the law, or any applicable codes of conduct or behaviour for the Company and its personnel; and
- c) any existing person within the Company being prejudiced by this policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

3.2 Adoption of Policy and Board review

This policy was adopted by the Board on 24 September 2019, and takes effect from that date and replaces any previous policy in this regard.

The Board will review this policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

3.3 Amendments to this Policy

The Company may discontinue or amend any part or the whole of this policy from time to time at its absolute discretion. This policy can only be amended with the approval of the Board.