



Diversity Policy

1. INTRODUCTION

Comms Group Limited (Company) and its controlled entities (Group) recognises that people are its most important asset and is committed to the maintenance and promotion of workplace diversity.

Diversity drives the Company's ability to attract, retain, motivate and develop the best talent, create an engaged workforce, deliver the highest quality services to its customers and continue to grow the business.

The Board has formally approved this Diversity Policy (Policy) in order to address and actively facilitate a more diverse and representative management and leadership structure.

This Policy:

- (a) supports the commitment of to an inclusive workplace that embraces and values diversity;
- (b) provides a framework for new and existing diversity-related initiatives, objectives, strategies and programs within the business of the Group;
- (c) supports the commitment of the Group to informing shareholders regarding its progress towards implementation and achievement of its diversity objectives; and
- (d) supports the commitment of the Group to aim for compliance with the ASX Corporate Governance Principles and Recommendations.

2. BENEFITS OF DIVERSITY

2.1 Diversity refers to the variety of differences between people in an organisation. Diversity encompasses gender, race, ethnicity, disability, age, sexual orientation, family responsibilities, cultural background and more.

2.2 Diversity is a key strategic asset of the Group. Improving diversity is therefore a key strategic focus.

2.3 The Group's commitment to diversity forms part of its merit-based organisational culture dedicated to the recruitment and retention of the best available talent at all levels, up to and including the Board.

2.4 The Group believes that embracing diversity in its workforce contributes to the achievement of its corporate objectives and enhances its reputation. It enables the Group to:

- (a) recruit the right people from a diverse pool of talented candidates;

- (b) make more informed and innovative decisions, drawing on the wide range of ideas, experiences, approaches and perspectives that employees from diverse backgrounds, with differing skill sets, bring to their roles; and
- (c) better represent the diversity of its stakeholders and markets.

3. COMMITMENT TO DIVERSITY

3.1 The Group is committed to achieving the goals of:

- (a) providing access to equal opportunities at work based on merit; and
- (b) fostering a corporate culture that embraces and values diversity.

3.2 The Company is an equal opportunity employer and welcome people from a diverse set of backgrounds.

4. BOARD COMPOSITION AND SELECTION

4.1 The Company's Board Charter provides that the board of directors of the Company (**Board**) should be made up of directors:

- (a) with an appropriate range of skills, experience and expertise;
- (b) who can understand and competently deal with current and emerging business issues; and
- (c) who can effectively review and challenge the performance of management, and exercise independent judgment.

4.2 The Board has established a People and Remuneration Committee. An objective of the Committee is to help the Board achieve its objective of ensuring that it has an effective composition, size and commitment to adequately discharge its responsibilities and duties. These responsibilities are set out in the People and Remuneration Committee Charter (which is available on the Company's website.) Its responsibilities include, among others:

- (a) identifying and recommending to the Board nominees for membership of the Board, including the chief executive officer;
- (b) identifying and assessing the necessary and desirable competencies and characteristics for Board membership, and regularly assessing the extent to which those competencies and characteristics are represented on the Board;
- (c) developing and implementing processes to identify and assess necessary and desirable competencies and characteristics for board members; and
- (d) ensuring succession plans are in place to maintain an appropriate balance of skills on the board and reviewing those plans;

- 4.3 The Committee's procedure for identifying, assessing and selecting candidates for appointment as directors is set out in the People and Remuneration Committee Charter, and also includes making suitably extensive enquiries to find candidates from non-traditional sources.
- 4.4 The People and Remuneration Committee has regard to gender diversity objectives in Board recruitment, Board performance evaluation and succession planning processes.
- 4.5 The People and Remuneration Committee has regard to the corporate culture of the Group which embraces diversity in the composition, recruitment and the differences in desired skill set of and between employees, senior management and the board.

5. RECRUITMENT OF EMPLOYEES AND SENIOR MANAGEMENT

The Group is committed to ensuring equal employment opportunity for all employees and senior management, based on merit, ability, performance and potential, in a way that contributes to the achievement of its corporate objectives, including diversity.

6. OBJECTIVES FOR ACHIEVING GENDER DIVERSITY

- 6.1 As the Company grows in size, the Board will:
- (a) establish measurable objectives for achieving gender diversity; and
 - (b) periodically review and assess both the measurable objectives for achieving gender diversity and the Group's progress in achieving them.
- 6.2 When established, the Board will disclose in the Company's Annual Report both its objectives for achieving gender diversity and its progress in achieving those objectives.
- 6.3 The Board will disclose in the Company's Annual Report the proportion of women employees in the whole organisation, women in senior executive positions and women on the board.
- 6.4 To assist the Board to fulfil its responsibilities under paragraph 6.1, the Company Secretary will:
- (a) oversee a review of the relative proportion of men and women across the whole of the Group's organisation, in senior executive positions and on the Board, respectively;
 - (b) report to the Board on the findings of this review and its recommendations for the objectives to be set by the Board for achieving gender diversity, having regard to any gaps identified from the review; and
 - (c) report to the Board on the Group's progress in achieving the objectives set by the Board for achieving gender diversity.
- 6.5 Achievement of the objectives set by the Board is a factor which will be considered in assessing the performance of the Board, Chief Executive Officer and senior executives within the Group

7. POLICIES THAT SUPPORT DIVERSITY

The Groups commitment to recognising the importance of diversity extends to all areas of the business including recruitment, talent development, skills development, appointment to roles, Board appointments, retention of employees, mentoring and coaching programs, flexible work arrangements, forms of leave available to employees, succession planning, and training and development.

This is further supported by the Group committing to eliminate all forms of unlawful discrimination, unlawful harassment, bullying, and victimisation of persons in the workplace.

8. ROLES AND RESPONSIBILITIES

Every employee within the Group is responsible for supporting and maintaining the Group's corporate culture, including its commitment to diversity in the workplace. Every employee is committed to providing a healthy and safe place to work.

9. REVIEW AND CHANGES TO THIS POLICY

9.1 The Board will review this policy periodically as necessary to ensure it complies with any applicable legal requirements and remains relevant and effective.

9.2 The Board may change this policy from time to time by resolution.

9.3 This policy is not contractual in nature.

9.4 This policy is not a promise of continued employment or of the benefits of that employment.

10. INTERACTION WITH OTHER LEGISLATION

This policy applies to the extent that it does not conflict with equal employment opportunity and anti-discrimination legislation in jurisdictions in which the Group operates.

11. QUESTIONS

Any questions about this policy should be directed to the Company Secretary.

12. APPROVED AND ADOPTED

This policy was approved and adopted by the Board on 27 October 2017.

This policy was reviewed in August 2022

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