



# Diversity Policy

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Flynn Gold Limited

Adopted by the Board on 15 February 2021 to come into effect from the date of listing on the Australian Securities Exchange.

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## 1. Introduction

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This Diversity Policy (**Policy**) sets out the policy of Flynn Gold Limited ACN 644 122 216 and its subsidiaries (collectively referred to as the **Company**) in relation to its commitment to creating an inclusive culture in which difference is recognised and valued.

The Company recognises that diversity in business helps create sustainable shareholder value, provides a more dynamic and enjoyable work environment, and will often create new opportunities for the Company.

### 1.1 Diversity includes but is not limited to gender, age, race, ethnicity, disability, marital status, family responsibilities, religion, cultural background and sexual orientation. Purpose of this Policy

The Company recognises that people in an organisation often come from a range of different backgrounds with different life experiences. The Company believes that embracing diversity in its workforce contributes to the achievement of its corporate objectives and enhances its reputation.

The purpose of this Policy is to enable the board of the Company (**Board**) to:

- (a) set measurable objectives for achieving diversity; and
- (b) annually review and assess those measurable objectives and the Company's progress in achieving them.

### 1.2 Application

This Policy applies to all of the Company's people, who include but may not be limited to:

- (a) Board; and
- (b) all Company officers, employees and all people who work for the Company, including contractors and consultants.

This Policy is to be read in conjunction with:

- (c) the Code of Conduct;
- (d) Statement of Values; and
- (e) any other existing employment related policies and documentation of the Company.

This Policy does not form part of an employee's contract of employment with the Company, nor does it give rise to contractual obligations. However, to the extent that this Policy requires an employee to do or refrain from doing something, and at all times subject to legal obligations, this Policy forms a direction of the Company with which an employee is expected to comply.

## 2. Commitment to diversity

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This Company is committed to:

- (a) ensuring that the Company's corporate culture and values at all levels support diversity and inclusion in the workplace whilst maintaining a commitment to a high-performance culture;
- (b) ensuring that recruitment and selection practices at all levels are appropriately structured so that a diverse range of candidates are considered and guard against any conscious or unconscious biases that might discriminate against certain candidates;
- (c) designing and implementing programmes and processes that will assist in the development of a broad and diverse pool of skilled and experienced employees and that, over time, will prepare them for senior management and board positions;
- (d) having a zero tolerance for discrimination, harassment, vilification and victimisation so as to promote an inclusive workforce;
- (e) supporting an individual's domestic responsibilities (including the adoption of 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 workplace;
- (g) ensuring the policy for selection and appointment of new directors is transparent and considers all facets of diversity to avoid "groupthink" or other cognitive biases in decision making;
- (h) ensuring development and succession plans for directors and senior management include gender diversity as a consideration;
- (i) monitoring and measuring the achievement of all diversity objectives set by the Board; and
- (j) considering whether key performance indicators for senior management might be an appropriate way of furthering gender diversity.

(collectively, the **Diversity Objectives**).

This Policy does not impose on the Company, 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-discrimination or equal employment opportunity legislation or laws in any place the Company's does business.

## 3. Benefits of diversity

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The Company recognises that organisations performance is linked to workplace diversity. Through fostering an inclusive environment that recognises a variety of quality employees, the Company aims to improve employee retention, to embrace different perspectives and to enhance the Company's reputation.

Embracing diversity in the workforce enables the Company to:

- (a) improve financial performance

- (b) attract and recruit the right people from a diverse pool of talented candidates;
- (c) create a culture that embraces diversity and that rewards people who act in accordance with this Policy;
- (d) develop and retain an appropriate skills base in the Company;
- (e) make more informed and innovative decisions, drawing on the wide range of ideas, experiences, approaches and perspectives that employees from diverse backgrounds, and with differing skill sets, bring to their roles in the Company; and
- (f) better reflect the diversity of all stakeholders.

#### 4. Responsibilities

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- (a) The Board has formally adopted this policy, reflecting a commitment by the Board for the Company to achieve its Diversity Objectives.
- (b) The Board has responsibility for this Policy, including its regular review and the monitoring of its effectiveness.
- (c) The Board has responsibility to:
  - (i) annually set measurable objectives for achieving gender diversity in the composition of the Board, senior management and workforce generally (**Objectives**) and, where appropriate, other aspects of diversity including women in leadership, age diversity and cultural diversity;
  - (ii) assess annually the Company's progress in achieving the Objectives; and
  - (iii) disclose:
    - (A) the Diversity Policy on the Company's website;
    - (B) the Objectives set for the relevant reporting period and the Company's progress in achieving the Objectives in the Company's Corporate Governance Statement; and
    - (C) the respective proportions of men and women on the Board, in senior executive positions and across the whole workforce (including how the entity has defined "senior executive" for these purposes) or the Company's Gender Equality Indicators, as defined in the Workplace Gender Equality Act 2012 (Cth).
- (d) If the Company undertakes a gender pay equity audit (which must be approved by the Board), the Board will consider the results of any such audit and any disclosure related issues.
- (e) The Board will be responsible for approving any key performance indicators for senior management in relation to any of the Company's objectives.

#### 5. Overriding Caveat

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Nothing in this Policy is to be taken, interpreted or construed so as to endorse:

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

## **6. Review and changes to this Policy**

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- (a) The Board will review this Policy annually or as often as it considers necessary to check it is operating effectively and consider whether changes are required.
- (b) The Board may change this Policy from time to time by resolution.
- (c) Any changes to this Policy will be communicated by the Company to its staff, its shareholders and the market.
- (d) Updates and amendments to this Policy will be the responsibility of the Secretary.
- (e) All new management or other relevant staff will be provided with a copy of this Policy as part of their induction into the Company.
- (f) Any updates or amendments as approved by the Board will be notified to appropriate officers and staff by the Secretary and corresponding updates and amendments will be made to this Policy and be disclosed on the Company's website.

## **7. Approved and adopted**

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This Policy was approved and adopted by the Board on 15 February 2021 to be effective from the date of listing on the ASX.