



Diversity & Inclusion Policy

DOCUMENT MANAGEMENT

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Authorised By: Board of Directors of Sequoia Financial Group ("SFG")			

1. INTRODUCTION

At Sequoia Financial Group ("the **Company**") we respect and value the competitive advantage of diversity (which includes, but is not limited to gender, age, ethnicity, and cultural background).

Sequoia is committed to an inclusive culture which values diversity of thought, opinion and background, and where its employees are provided with equal access to opportunities. This diversity enriches the culture with diversity of thought being key to our competitive advantage.

The Board and the leadership team at all times, seeks to deploy the best people it can in whatever role. The Board calls this the Company's 'Merit and Ability' philosophy. The 'Merit and Ability' philosophy is used to employ, promote, and contract on the basis of merit, ability, performance, responsibility, integrity, attitude and work ethic.

Sequoia's goal is to create a culture that is diverse, inclusive and that respects and celebrates our differences.

2. PURPOSE

The purpose of this policy is to provide the framework by which the organisation actively manages and encourages diversity and inclusion.

The organisation's goal is to create a culture that is diverse, inclusive and that respects and celebrates our differences.

3. DIVERSITY & INCLUSION STATEMENT

Sequoia appreciates the value inherent in a diverse workforce. Diversity may result from a range of factors: origin, age, gender, race, religion, cultural heritage, lifestyle, education, physical ability, appearance, language or other factors. We value the differences between people and the contribution these differences make to our business.

We will actively manage diversity and inclusion, seeking ways of acknowledging and embracing the differences that exist. This means that we will:

- actively and flexibly seek to accommodate the unique needs of many different employees
- commit to ensuring that all employees are treated with respect, dignity, and openness
- understand the importance of diversity across religion, race, ethnicity, language, gender, sexual orientation, disability, age or any other area of potential difference

Our processes which demonstrate our commitment to our Diversity and Inclusion Policy are reviewed periodically, in line with the changing needs of our employees, our business priorities, and the social and cultural contexts in which we operate.

The CEO and Board discuss and establish specific objectives for improving diversity and inclusion across the organisation and annually assess progress against these objectives. Sequoia maintains a safe work environment that does not tolerate inappropriate workplace and business behaviour (including discrimination, harassment, bullying, victimisation, and vilification).

4. DEFINITIONS

In relation to this Diversity and Inclusion Policy:

- **Diversity** refers to the visible and invisible differences that exist between people, including (but not limited to) race, colour, physical features, sex, sexual preference, gender identity, lawful sexual activity, age, physical or mental disability, marital status, family responsibilities, pregnancy, breast feeding, carer responsibilities, religion, political opinion, national extraction, social origin, industrial activity or trade union membership. It also refers to diverse ways of thinking and ways of working.
- **Inclusion** refers to ensuring that current, future and potential employees have equality of opportunity in the organisation without any barriers or obstacles as a result of their race, colour, physical features, sex, sexual preference, gender identity, lawful sexual activity, age, physical or mental disability, marital status, family responsibilities, pregnancy, breast feeding, carer responsibilities, religion, political opinion, national extraction, social origin, industrial activity or trade union membership.
- **Equal employment opportunity (“EEO”)** is the principle that all persons can have equal access to employment opportunities based on merit, without fear of discrimination or harassment.

5. DIVERSITY PRINCIPLES

The organisation’s diversity and inclusion policy, processes and initiatives focus on four diversity and inclusion principles:

1. Decisions regarding recruitment, selection, training and development and promotion are based on merit, performance and capabilities.
2. The organisation embraces fairness, equality and inclusiveness and does not tolerate unlawful discrimination, bullying, harassment, or victimisation.
3. Diversity and inclusion and equal employment opportunity initiatives are based on sound business objectives.
4. Diversity and inclusion - This policy applies to all Partners, Employees, and Contractors of Sequoia including permanent, fixed term, full time, part time and casuals.

6. EQUAL OPPORTUNITY IN EMPLOYMENT

The organisation will provide equal opportunity in respect to employment and employment conditions, including:

- Recruitment and selection
- Performance management
- Training and development
- Career advancement
- Pay
- Promotion
- Support.

Employees will not have their employment terminated because of their sex, race, age, marital status, disability, sexual orientation, gender identity, intersex status, political activities, pregnancy or potential pregnancy or be made to retire.

Sequoia is committed to supporting all employees and managers in the achievement of a diverse and inclusive workplace. Managers are responsible for developing and encouraging a positive environment, where all employees are treated with respect and dignity.

7. MEASURABLE OBJECTIVES

Sequoia will establish, on an annual basis, measurable objectives for the achievement of diversity and inclusion. These objectives will include:

- Establishing goals for gender equity at all levels within the organisation
- Establishing goals for representation of under-represented groups within the organisation
- Implementing initiatives to address any identified pay equity gaps
- Implementing leadership programs that promote equal opportunity, diversity and inclusion practices and a diverse and inclusive organisational culture
- Implementing training and development programs that promote and embed EEO, diversity and inclusion practices within the organisation.

Management is responsible for implementing approved initiatives.

Objective	Details
Recruitment and selection	Ensure that employees and directors are selected from diverse candidate pools: <ul style="list-style-type: none"> • 60/40 gender mix in interviewing panels and shortlisted candidates for all management, Executive and Board positions. • Capture and record information during the on-boarding process in relation to cultural diversity.
Flexibility	Create a culture that supports a balance of work and family commitments. Implement programmes that provide better flexibility for parents and expecting parents. These will include: <ul style="list-style-type: none"> • Flexible working arrangements and practices. • Formal policy or strategy to support employees experiencing family or domestic violence.
Paid Parental leave Policy	Currently offering 4 weeks of paid parental leave for employees.

Leadership Accountability	<ul style="list-style-type: none"> • Gender equality • Senior leader gender KPIs then cascaded to all managers • Roll-out of inclusive leadership program • Unconscious bias training • Executive coaching includes gender equality.
Gender Pay	Remuneration is based on market data and is reviewed annually.

8. MONITORING AND REPORTING

The HR function will regularly measure and report on the progress towards achieving diversity and inclusion objectives and will conduct an annual assessment of the measurable objectives.

The executive management team will regularly report to the board on the progress towards achieving diversity and inclusion objectives.

Disclosure of diversity and inclusion reporting and outcomes will be made to key stakeholders on an annual basis. For example, via the organisation’s annual report and reporting to the Workplace Gender Equality Agency.

9. COMPLIANCE

Human Resources will proactively monitor organisational performance in meeting policy requirements.

Human Resources in partnership with the management team will ensure that all employees undertake regular compliance training in relation to Diversity and Inclusion, and legislative and other responsibilities relating to anti-discrimination, workplace bullying & harassment, and equal employment opportunity.

Human Resources will also conduct regular reviews of the processes involved in recruitment, remuneration, performance management and training and development to assess the implementation of and compliance with this policy.

Managers have a responsibility to ensure the workplace is free from discrimination, harassment or bullying, and that all employees comply with the diversity and inclusion policy.

10. RELATED POLICIES

The organisation’s approach to equal employment opportunity, diversity and inclusion is supported by a range of policies which are available on Employment Hero, including:

- Code of Conduct
- SFG General Policies and Procedures Policy
- SFG WHS Policy
- Performance and Conduct Policy
- Recruitment Policy