



Diversity Policy

Poseidon Nickel Limited ABN 60 060 525 206

Adopted by the Board on 15 December 2021

Poseidon Nickel Limited Diversity Policy

1 Introduction

- (a) Poseidon Nickel Limited and its subsidiaries (collectively **Poseidon**) acknowledges the positive outcomes and better overall performance that can be achieved through a diverse workplace, including the ability to attract, retain and motivate directors, officers and employees from the widest possible pool of available talent.
- (b) Poseidon recognises and utilises the contribution of diverse skills and talent from its directors, officers and employees. Poseidon also recognises that in order to have an inclusive workplace, discrimination, bullying, harassment, vilification and victimisation cannot and will not be tolerated.
- (c) For the purposes of this policy, diversity includes, but is not limited to gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, socio-economic or cultural background, perspective and experience.
- (d) This policy applies to all officers, employees and all people who work at Poseidon, including contractors and consultants.
- (e) This policy will be reviewed at least annually by the board of Poseidon (**Board**) to ensure that it is operating effectively and whether any changes are required.

2 Commitment of Poseidon

Poseidon is committed to:

- (a) ensuring that Poseidon's corporate culture and values at all levels supports 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 guarding against any conscious or unconscious biases that might discriminate against certain candidates;
- (c) designing and implementing programs and processes 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;
- (d) supporting at all levels an individual's domestic responsibilities (including the adoption of flexible work practices that will assist them to meet those responsibilities);
- (e) providing opportunities for employees on extended parental leave to maintain their connection with the workplace;
- (f) 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;

- (g) ensuring development and succession plans for directors and senior management include gender diversity as a relevant consideration;
 - (h) monitoring and measuring the achievement of all diversity objectives set by the Board; and
 - (i) considering whether key performance indicators for senior management might be an appropriate way of furthering gender diversity objectives.
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3 Responsibilities

- (a) The Board has formally adopted this policy, reflecting a commitment by the Board for accountability across Poseidon to achieve its diversity goals.
- (b) Poseidon's Board has established a remuneration, nomination and diversity committee (**Committee**).
- (c) The Committee has responsibility for this policy, including its regular review and the monitoring of its effectiveness.
- (d) The Committee has responsibility to:
 - (i) set measurable objectives for achieving gender diversity in the composition of its Board, senior management and workforce generally (**Objectives**) and, where appropriate, other aspects of diversity including in respect of women in leadership, age diversity and cultural diversity;
 - (ii) assess annually Poseidon's progress in achieving the Objectives; and
 - (iii) disclose:
 - (A) this Policy on Poseidon's website;
 - (B) the Objectives set and Poseidon's progress in achieving the Objectives in Poseidon's annual report; 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 entity's Gender Equality Indicators, as defined in the *Workplace Gender Equality Act 2012* (Cth).
- (e) If Poseidon 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.
- (f) The Committee will be responsible for approving any key performance indicators for senior management in relation to any of Poseidon's diversity objectives.