



# Diversity & Inclusion Policy.

Updated 13 December 2024

# Policy Statement.

Superloop confirms the Corporate Governance Principles and Recommendations issued by the ASX Corporate Governance Council, as amended from time-to-time, for addressing Diversity and is committed to provide guiding principles to actively encourage and promote a Diverse and Inclusive culture.

We believe that our shareholders and stakeholders will also benefit from improved Diversity due to a broader talent pool and an enriched environment for new ideas. It is important to our success that we respect, unite and celebrate these differences, not as a standalone initiative but as part of our culture.

The Policy will be reviewed by Superloop's Chief Legal & Corporate Officer/ Company Secretary and presented to the Remuneration & Nomination Committee (RNC) periodically.

Information and progress updates on D&I metrics and initiatives will be provided to the Board via the Board reporting process.

# Purpose and Scope.

The Policy outlines our commitment to actively support and encourage a Diverse and Inclusive environment at all levels where people feel like they can contribute and belong. We recognise that an Inclusive and Diverse culture helps attract and retain the best people from the widest pool of available talent and leads to increased quality of decision making and an Inclusive culture.

The Policy applies to all employees including permanent, fixed-term, casual employees and contractors (**Team Members**).

# Superloop Culture Framework.

The Policy also reflects Superloop's Code of Conduct and works alongside our core values: unleash possibilities, start with the customer and win together.

## Unleash Possibilities

Think differently  
Speak up  
Move forward with speed

## Start with the Customer

Do what matters  
Make the complex simple  
Own it

## Win Together

Lead by example  
Encourage every voice  
Unify the team

# Superloop Guiding Principles.

The policy is based on the following guiding principles:

1. We act in the best interest of our stakeholders;
2. We act with honesty and integrity and play by the rules;
3. We look after each other, play fair, so personal conflict doesn't get in our way;
4. We use our resources appropriately and don't do things for personal gain.

# Superloop Actions.

The following key actions help us create and maintain an Inclusive culture.

## 1. WE ACT IN THE BEST INTEREST OUR STAKEHOLDERS

We acknowledge that we must always act in the best interests of Superloop and our shareholders.

Superloop will disclose in the Annual Report our objectives for achieving Diversity, together with a summary of the Diversity policy. Superloop will monitor the Diversity and Inclusion performance using appropriate measures and provide reporting in line with/and for the following purposes:

- Review and endorsement by Superloop Board, RNC and Corporate Services team;
- Diversity & Inclusion Policy revision periodically;
- Workplace Gender Equality Agency (WGEA) annual reporting is completed as per guidelines and measures are implemented;
- Superloop Annual Report and Corporate Governance Statement.

We will establish frameworks which guide our decisions and actions in relation to remuneration, performance and talent management to ensure all decisions are made in a way that does not discriminate against anyone and supports the Diverse culture that we are striving for.

Superloop may set targets where appropriate as well as track and report those targets as necessary in the Corporate Governance Statement.

## 2. WE ACT WITH HONESTY AND INTEGRITY AND PLAY BY THE RULES

### Equal opportunity

We ensure Equal Employment Opportunity (EEO) applies and decisions relating to employees are fair, based on merit and respect for individual differences. Our talent acquisition process aims to attract and retain a workforce whose composition reflects a Diversity of backgrounds, skills, experience and attributes. Recruitment is made based on merit with the priority of ensuring we find the best fit possible for the role.

### People Leader's Handbook

Our leadership program includes Diversity & Inclusion as part of our core leadership expectations.

People Leaders are required to:

- create an Inclusive and Diverse team environment that values and respects different perspectives, backgrounds, and ideas.
- Champion initiatives that promote equality and belonging.

## 3. WE LOOK AFTER EACH OTHER, PLAY FAIR, SO PERSONAL CONFLICT DOESN'T GET IN OUR WAY

### Workplace Behaviour Policy

The culture, safety and performance of our business relies heavily on the behaviour of all individuals regardless of role or location. Misconduct and behaviour that is misaligned to our values isn't tolerated, and the Workplace Behaviour policy sets out Superloop's expectations. Our expectation is that anyone who witnesses discrimination, harassment or bullying should do something to prevent it if possible and report to the appropriate channels.

### Remuneration Strategy and Workplace Gender Equality Agency (WGEA)

Superloop is committed to pay equity. Superloop is committed to conducting an annual pay parity review as part of its remuneration review process to identify any gaps that may have developed in comparable roles and performances, which are then re-evaluated and addressed as a priority regardless of gender or other attributes.

Superloop takes proactive steps to ensure comparable roles and performances are paid equally, regardless of gender or any other attributes. We ensure that each role across our workforce is benchmarked accurately using the latest industry benchmarking data. The WGEA public reports are available annually through [Superloop's Investors Centre](#).

## 4. WE USE OUR RESOURCES APPROPRIATELY AND DON'T DO THINGS FOR PERSONAL GAIN

### Conflict of Interest Policy

Employees and contractors have a duty of loyalty to Superloop arising from their employment or contractual arrangement with Superloop. Team Members must not act in a manner or engage in any acts that contradicts the interests of Superloop. Where there is a conflict between the personal interests of a Team Member or contractor, and the interests of Superloop, the latter must prevail. The Board monitors compliance with the Conflict of Interest policy on a regular basis.

## Engagement

At Superloop, we have a set of shared values that unite us. They include speaking up, doing what matters, and encouraging every voice. Through our engagement survey, we ask for employees to speak up and tell us what they believe matters. We believe we can only achieve our goals at Superloop when all our Team Members are engaged, supported, and feel empowered to deliver. We value their insights, experience, and suggestions to help us determine which aspects of the employee experience we're doing well, and which areas we can improve.

We believe it's important for people to feel heard and to know that their feedback matters and will be taken seriously.

## Working From Office (WFO) Policy

The Working From Office (WFO) Policy sets out the guidelines to be followed by employees and their managers where an agreement has been reached for employees to be able to work from home. Working from home is not an entitlement but rather a flexible work option that may be appropriate if the manager determines that the work can be performed at home as effectively as at Superloop's premises to ensure resources are available appropriately.

This Policy will be made available to all employees via SharePoint and communicated through internal channels to ensure awareness and understanding.

# Other Related Documents.

- People Leader's Handbook;
- Code of Conduct;
- Workplace Behaviour Policy;
- WGEA Statement and WGEA Public Report;
- Conflict of Interest Policy;
- Conflict of Interest (Directors and Officers);
- Social Connection & Community Engagement Strategy;
- Continuous Disclosure Policy;
- Working from Office Policy (WFO).

This Policy does not stand alone nor take the place of any legislative or regulatory requirement which takes precedence in the case of inconsistency.

## DEFINITIONS:

ASX	means ASX Limited ACN 008 624 691 and the exchange operated by it.
Board	means the Company's board.
Company, Superloop or Superloop Group	means Superloop Limited ACN 169 263 094 and, as the context requires, its controlled entities whether directly or indirectly.
Diversity or Diverse	Diversity means the inherent differences between individuals. Diversity is about what makes each of us unique and includes our backgrounds, personality, life differences and beliefs.
Inclusion or Inclusive	It is the act or practice of including and integrating all people. Occurs when people feel and are valued and respected.
Policy	means the policy contained in this document or in any amending or replacement document.
We or our	Refers to Superloop Group
WGEA	Workplace Gender Equality Agency