

EQUAL EMPLOYMENT OPPORTUNITY AND DIVERSITY POLICY

Approved 25 May 2017

1. INTRODUCTION

- (a) The Board of Redflex Holdings Limited is committed to an inclusive workplace that fosters the promotion and affirmation of diversity within the Redflex Group of companies (**Redflex**). Each employee also has a personal responsibility for the implementation of this Policy.
- (b) Redflex is committed to creating an inclusive work environment free of discrimination and harassment, in which all employees are provided with equal access to opportunities at work. Affirming equal opportunity through our employment practices reflects our commitment to our most valuable asset, our people. We recognise that our people are critical to our success. We seek to leverage and acknowledge the breadth of unique skills, background and perspectives that our diverse workforce contributes.
- (c) Redflex believes that fostering diversity at all levels results in greater alignment with our customers and with the market, improves the creativity and agility of our leadership teams and supports the development of an enhanced talent pipeline for key and future roles by enabling access to a broader pool of talent.

2. ACCOUNTABILITY AND RESPONSIBILITY

- (a) The Redflex Board, assisted by the Redflex global leadership team, is responsible for devising and implementing programs to achieve the Group's diversity objectives, including monitoring the representation of women at all levels of the organisation and assessing the progress of diversity objectives set by the Board.
- (b) The Board has also delegated responsibility for the Director selection process to the Nominations Committee of the Redflex Board and the responsibility for reviewing remuneration strategy to the People, Culture & Remuneration Committee. The Board maintains oversight and responsibility for the Group's diversity policy and objectives.
- (c) Employees of Redflex are also accountable and responsible for their own conduct with respect to affording equal treatment and respect to their colleagues and peers.

3. LEGISLATION AND REGULATION

- (a) Redflex acknowledges that across the jurisdictions in which we operate, regulatory frameworks are in place to protect people from direct or indirect discrimination in recruitment and/or employment on the basis of protected and/or characteristic grounds.
- (b) In general terms, the relevant regulatory frameworks describe different forms of discrimination that may occur. These may include, but are not limited to:



- (i) **Direct Discrimination:** where a person is treated less favourably than another because of a protected characteristic.
- (ii) **Indirect Discrimination:** where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic and who are treated differently because of that protected characteristic.
- (iii) **Harassment and Bullying:** where there is repeated, unwanted treatment of a person, where the treatment has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.
- (iv) **Associative Discrimination:** where an individual is directly discriminated against or harassed based on association with another individual who has a protected characteristic.
- (v) **Perceptive Discrimination:** where an individual is treated differently based on a perception that the individual has a particular protected characteristic.
- (vi) **Third Party Harassment:** where an employee is harassed by third parties such as clients, suppliers or customers on the basis of a protected characteristic.
- (vii) **Victimisation.** Where an employee is subjected to a detriment, such as being unfairly denied a promotion.

4. DIVERSITY AND EQUAL OPPORTUNITY OBJECTIVES

Redflex is committed to:

- (a) equal, fair and respectful treatment of all job applicants, employees, clients and customers;
- (b) a range of diversity and equal employment opportunity objectives; progress against the objectives set will be included in Redflex annual reports to shareholders;

include:

- (i) **Inclusive culture:** fostering an inclusive workplace culture that upholds our central principle of meritocracy.
- (ii) **Workforce diversity:** celebrating our cultural diversity with our workforce reflecting the diversity of the populations in which we operate.
- (iii) **Advocate for women in leadership:** embedding diversity initiatives into our broader talent management processes to support the development of all talent, and also, to increase the representation of women in management roles, in the following ways:



- The Group Chief Executive Officer will collaborate with the Redflex global leadership team on setting goals for their groups around women in leadership, which are both relevant and practical to the functions of the relevant teams.
 - Talent and performance management processes will include a review of career paths for women in executive positions.
- (iv) **Right person for the right role:** hiring the best person for each employment opportunity, and is committed to the consideration of a broad and diverse pool of talent.
- (v) **Pay Equity:** ensuring equal pay for equal work across our workforce.

5. EQUAL EMPLOYMENT OPPORTUNITY

This Policy applies to:

- (a) every aspect of the employment relationship, from recruitment and selection through to termination;
- (b) the process of recruitment and selection of all employees irrespective of their employment status. This includes, but is not limited to:
- (i) **Recruitment and Selection:** employees involved in the recruitment and selection process must ensure they have read and understood this Policy, and conduct themselves in accordance with this Policy.
 - (ii) **Assessment Criteria:** will be objective, role specific and carefully assessed to ensure that the criterion specified are objectively necessary,
 - (iii) **Position Descriptions and Specifications:** will be limited to those requirements necessary for the effective performance of the role.
 - (iv) **Reasonable Adjustment:** Redflex will consider any reasonable accommodations and /or adjustments that may be required by candidates. Where there is a specific occupational requirement, it must be measurable and justifiable.
- (c) the provision of training.
- (d) The Company is committed to ensuring equality of opportunity and will provides opportunities for ongoing professional development for all employees, where it is practicable and reasonable to do so.

6. ISSUE RESOLUTION

- (a) Redflex will seek to resolve issues identified by employees in a responsive and pro-active manner.
- (b) In the first instance, employees are encouraged to address any concerns about equal employment opportunity and diversity to their Leader.



- (c) Employees may also use the Company’s Grievance Procedure or whistle blower hotline to complain about discriminatory conduct.
- (d) Employees may be subject to disciplinary action if a complaint is made that is vexatious, is not made in good faith, and is without basis in fact.
- (e) Employees should report any harassment or bullying by customers, suppliers, visitors or others to the Company.

7. REVIEW OF POLICY

- (a) The Board will review this policy periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- (b) This policy is not intended to be contractual in nature.
- (c) The Board may change this policy at any time.