

Diversity Policy

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Diversity Policy

Primewest Group Limited and its subsidiaries and Primewest Management Limited as responsible entity of the Primewest Property Fund (Primewest)

1. Background

1.1 Overview

- (a) Primewest is a forward thinking and dynamic organisation that holds its people in the highest esteem and considers them to be its greatest asset.
- (b) Primewest's workforce is made up of many individuals with diverse skills, values, experiences, backgrounds and attributes including those gained on account of their gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation and gender identity.

1.2 Diversity Policy Statement

- (a) [Primewest values and is proud of its strong and diverse workforce and is committed to supporting and further developing this diversity through attracting, recruiting, engaging and retaining diverse talent and aligning Primewest's culture and management systems with this commitment.
 - (b) Primewest believes that such a commitment to diversity creates competitive advantage and enhances employee participation, and in this way is essential to the organisation continuing to succeed and grow strong.
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2. Key Principles

2.1 Strategies

Primewest is committed to providing and promoting a corporate culture which embraces diversity in line with the Diversity Policy Statement, and aims to do so via:

- (a) promoting the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements;
- (b) having an overall transparent process for the review and appointment of senior management positions and Board members;
- (c) recruiting from a diverse pool of qualified candidates, where appropriate engaging a professional search / recruitment firm, advertising vacancies widely, making efforts to identify prospective employees who have diversity attributes and ensuring diversity of members on the selection / interview panel when selecting and appointing new employees (including senior management) and new Board members;
- (d) embedding the importance of diversity within the Company's culture by encouraging and fostering a commitment to diversity by leaders at all levels whilst recognising that diversity is the responsibility of all employees;
- (e) recognising that employees may have family responsibilities;

- (f) reinforcing with our people that in order to have a properly functioning and diverse workplace, discrimination, harassment, vilification and victimisation will not be tolerated within the Company; and
- (g) continuing to review and develop policies and procedures to ensure diversity within the organisation, including with the adoption of key performance indicators for senior executives to measure the achievement of diversity objectives under the Company's diversity policy.

2.2 Key Initiatives and Programs

Primewest also aims to introduce and / or maintain the following programs and initiatives to assist with improving diversity within the organisation:

- (a) mentoring programs;
- (b) career opportunity and targeted professional development programs including those aimed at helping employees develop skills and experience in preparation for senior management and board positions;
- (c) work life balance policies including flexible work options, access to childcare facilities, return to work programs and the like; and
- (d) networking opportunities.

2.3 Measurable Objectives

- (a) Primewest will set and implement measurable objectives to achieve gender diversity.
- (b) Management will develop, for consideration and approval by the Board or the Remuneration & Nomination Committee as appropriate, the measurable objectives.
- (c) At least annually, management will monitor, review and report to the Board (including via the Remuneration & Nomination Committee) on the achievement of these matters, gender diversity and Primewest's progress under this policy more broadly, including any appropriate benchmarking against other comparable businesses.

2.4 Communication

In order to promote transparency and accountability and to further the objectives of this policy Primewest will:

- (a) post a copy of this policy or a summary of it on its website;
- (b) disclose a copy of the policy or a summary of it in its annual report; and
- (c) disclose in relation to each reporting period:
 - (i) the measurable objectives set for that period to achieve gender diversity;
 - (ii) Primewest's progress towards achieving those objectives; and
 - (iii) either:
 - (A) the respective proportions of men and women on the board, in senior executive positions and across the whole workforce (including how Primewest has defined 'senior executive' for these purposes); or

- (B) if Primewest is a 'relevant employer' under the Workplace Gender Equality Act, Primewest's most recent 'Gender Equality Indicators', as defined in and published under that Act.

2.5 Compliance Requirements

- (a) Primewest is committed to meeting its obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (4th Edition) (**ASX Recommendations**) and any other applicable regulatory requirements, including by:
 - (i) establishing and disclosing this policy (pursuant to ASX Recommendation 1.5(a));
 - (ii) establishing measurable objectives for achieving gender diversity (pursuant to ASX Recommendation 1.5(b)); and
 - (iii) the Board periodically assessing the measurable objectives and the Company's progress in achieving them (pursuant to ASX Recommendation 1.6);
 - (iv) disclosing the measurable objectives for each period (pursuant to ASX Recommendation 1.5(c)(1));
 - (v) disclosing the progress towards achieving those objectives (pursuant to ASX Recommendation 1.5(c)(2)); and
 - (vi) disclosing the proportion of men and women across, the board, senior executive positions and the whole workforce (pursuant to ASX Recommendation 1.5(c)(3)(A)).
- (b) The Company Secretary is responsible for ensuring that Primewest meets its compliance and reporting obligations referred to above.

2.6 Responsibilities

- (a) The Board is ultimately accountable for this policy.
- (b) The Managing Director/CEO and members of the leadership team are responsible for the implementation of this policy and monitoring compliance with it, with the Company Secretary being responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant Board committee as appropriate).

3. Other matters

3.1 Overriding principles

Nothing in this policy will be taken, interpreted or construed so as to endorse:

- (a) the principal criteria for selection and promotion of people to work within Primewest being other than their overall relative prospect of adding value to Primewest and enhancing the probability of achievement of Primewest's objectives;
- (b) any discriminatory behaviour by or within Primewest contrary to the law, or any applicable codes of conduct or behaviour for Primewest and its personnel; and

- (c) any existing person within Primewest being prejudiced by this policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

3.2 Adoption of Policy and Board review

- (a) This Policy was adopted by the Board on 11 October 2019, and takes effect from that date and replaces any previous policy in this regard.
- (b) The Board will review this Policy periodically. The Company Secretary will communicate any amendments to employees as appropriate.

3.3 Amendments to this Policy

Primewest may discontinue or amend any part or the whole of this policy from time to time at its absolute discretion. This Policy can only be amended with the approval of the Board.