



## **DIVERSITY STANDARD**

**BST016 - REV 2 – 28/7/2020**

<b>REV NO.</b>	<b>DATE</b>	<b>APPROVED BY</b>
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## 1. CONTEXT

Base values and encourages a diverse workforce and is committed to providing an inclusive work environment in which everyone is treated fairly, with respect and can realise their full potential.

Base believes that having a diverse workforce and an inclusive working environment enhances business performance because it leads to a broader range of perspectives and insights on issues facing the business, and on potential opportunities for the business. Having a diverse workforce also enables access to the widest possible pool of available talent. Base recognises that, to have an inclusive workplace, discrimination, harassment, bullying and victimization cannot be tolerated.

Base's commitment to a diverse workforce and inclusive working environment aligns with the unifying set of beliefs and behavioural expectations that are the "Base Way".

## 2. PURPOSE

The overall purpose of the Diversity System is to encourage a diverse workforce and to ensure that people from diverse backgrounds can work and grow together in an inclusive working environment free from discrimination, harassment and bullying.

The purpose of this Standard is to:

- Give effect to aspects of the Employment Policy and establish the limits of discretion in relation to diversity.
- Set out the express requirements of Base, and the responsibilities of the Board, EXCO and all employees, in relation to inclusion and diversity.

References to Base in this Standard are to Base Resources Limited and each of its subsidiaries.

## 3. ELEMENTS

### 3.1 EQUAL OPPORTUNITY IN EMPLOYMENT:

Base will provide equal opportunity in employment for all employees, irrespective of their backgrounds. A number of practices that are in place to ensure this are as follows:

- All recruitment and selection decisions will be based on merit, will comply at all times with equal opportunity employment and anti-discrimination requirements and where appropriate, be structured so that a diverse range of candidates are considered.
- Our policies, procedures and practices are non-discriminatory.
- Employees will be selected for training and development opportunities on the basis of merit and company need.
- All decisions associated with career advancement, including promotions, transfers, and other assignments, will be determined based on merit.
- All remuneration decisions will be determined on the basis of merit and labour market pressure.
- Programs will be implemented to develop a broader and more diverse pool of employees.

### 3.2 DISCRIMINATION:

The Base workplace will be free of discriminatory decision making on the basis of the following grounds:

- race
- colour
- gender

- religion
- political opinion
- nationality
- ethnic or social origin
- cultural or socio-economic background
- pregnancy
- HIV status
- trade union membership, non-membership or lawful union activity
- age
- sexual preference
- gender identity
- marital or family status
- physical or mental disability
- carer responsibilities

### 3.3 HARASSMENT:

The Base workplace will be free from harassment. Base will not tolerate inappropriate treatment of any employee by managers, co-workers or contractors/suppliers based on the employee's personal circumstances or characteristics. In particular, Base will not tolerate:

- Sexual harassment: any unwanted conduct of a sexual nature, or other unwanted conduct based on sex affecting the dignity of women and men at work.
- Racial harassment: any conduct based on racial differences affecting the dignity of employees at work.

### 3.4 BULLYING:

Base will not tolerate workplace bullying. Workplace bullying is defined as 'the repeated less favourable treatment of a person by another or others in the workplace, which may be considered unreasonable and inappropriate workplace practice'. It includes behaviour that intimidates, offends, degrades or humiliates a workplace participant, possibly in front of co-workers, suppliers, contractors, customers or the public.

### 3.5 PROCESS REQUIREMENTS:

- Employees may, if they feel comfortable doing so, seek to resolve issues directly with their manager.
- Otherwise, a discrimination, harassment, bullying or victimisation complaint can be made using the Base Fair Treatment Process or, if the employee doesn't feel comfortable doing so, report utilising the Whistleblower Standard – see below for further details about each.

#### 3.5.1 Fair Treatment Standard

- A Base Fair Treatment review can be initiated by requesting one in writing from the employee's manager-once-removed, or, if he/she is implicated in the complaint, to the employee's manager-twice-removed or to an EXCO member.
- The HR Department can assist with writing a complaint or answering any questions about the Fair Treatment Process.
- The name of the complainant and the circumstances of the complaint will not be disclosed to any person except where it is considered necessary to investigate the complaint or take corrective or disciplinary action.

- The outcome of any investigation will be communicated clearly to the complainant in a timely manner following the investigation.
- If a complaint is made under the Fair Treatment Process, but it is determined that the Whistleblower Standard applies to that complaint, it will be dealt with under the Whistleblower Standard.

### 3.5.2 Whistleblower Standard

- A complaint may also be able to be made under the Whistleblower Standard by contacting a Whistleblower Receiving Officer or the independent external service provider engaged by Base from time to time to receive whistleblower reports.
- The Whistleblower Standard only applies to conduct that constitutes inappropriate conduct for the purposes of that Standard. In broad terms, inappropriate conduct is any conduct at Base or by a Base officer or employee which involves misconduct or an improper state of affairs or circumstances in relation to Base. Instances of discrimination, harassment, bullying or victimisation will generally be inappropriate conduct. However, the Whistleblower Standard will not apply to complaints solely concerning personal-work related grievances. Examples of personal work-related grievances include decisions about the engagement, promotion, termination or disciplining of a Base employee. For further details about the specific types of conduct that will amount to inappropriate conduct, refer to the Whistleblower Standard. Refer to the Whistleblower Standard for the names and contact details of the Whistleblower Receiving Officers, the contact details for the independent external service provider engaged by Base to receive whistleblower reports and details about how reports will be handled and investigated.
- If a complaint is made under the Whistleblower Standard, but it is determined that the Whistleblower Standard does not apply to that complaint, it will be dealt with under the Fair Treatment Process.

### 3.6 DISCIPLINARY ACTION:

- Instances of bullying, discrimination, harassment and victimisation will not be tolerated and are punishable via disciplinary action, which may include dismissal.
- Disciplinary action will be as per the Unacceptable Performance and Misconduct Standard.

## 4. REQUIREMENTS

### 4.1 ALL MANAGERS ARE REQUIRED TO:

- Support diversity and inclusion programs.
- Take all reasonable steps to ensure that the workplace is free of discrimination, bullying and harassment of any kind.
- Ensure that complainants or witnesses are not victimised in any way.
- Report allegations of discrimination, harassment, bullying or victimisation immediately to their manager or, if the Whistleblower Standard applies, to a Whistleblower Receiving Officer (or the independent external service provider engaged by Base from time to time to receive whistleblower reports).

### 4.2 THE MANAGER-ONCE-REMOVED IS REQUIRED TO:

- Sponsor and support diversity and inclusion programs.
- Take all reasonable steps to ensure that the workplace is free of discrimination, bullying and harassment of any kind.

- Ensure that complainants or witnesses are not victimised in any way.
- Investigate all allegations in a timely manner in accordance with the Fair Treatment Process, if applicable.
- Where the issue is broader than what can be addressed within their specific business area (e.g. institutional or systemic issues), escalate immediately to the EXCO.

#### 4.3 ALL EMPLOYEES ARE REQUIRED TO:

- Encourage diversity and inclusion in the workplace and foster a work environment in which everyone is treated fairly.
- Actively attempt to resolve any issues that arise.
- If they witness any discrimination, bullying, harassment or victimisation immediately notify their manager, if they feel comfortable doing so. Otherwise, if the Whistleblower Standard applies, immediately notify a Whistleblower Receiving Officer or the independent external service provider engaged by Base from time to time to receive whistleblower reports.
- Address any concerns or grievances directly with their manager if they feel comfortable doing so.
- When they are the victim of discrimination, harassment, bullying or victimisation in the workplace utilise the Fair Treatment Process, or, if they don't feel comfortable doing so and the Whistleblower Standard applies, the Whistleblower Process, without delay.

#### 4.4 THE DIVERSITY SYSTEM DRIVER (GROUP OD MANAGER) IS REQUIRED TO:

- Ensure the development of an inclusion and diversity education programme and ensure all employees understand what behaviour is not allowed and how to raise a complaint.
- If requested, provide assistance to employees wishing to make a complaint.
- For all complaints dealt with under the Fair Treatment Process, maintain a confidential central record of all complaints, investigations, findings and resultant actions.
- Provide reports to EXCO to enable identification of trends and systemic issues.

#### 4.5 THE DIVERSITY SYSTEM DRIVER IN COUNTRY (HR MANAGER) IS REQUIRED TO:

- Facilitate diversity and inclusion training.
- If requested, provide assistance to employees wishing to make a complaint.
- If requested, advise employees on how to initiate the Fair Treatment Process or, if the Whistleblower Standard applies, the Whistleblower Process.
- Take all reasonable steps to ensure that the complainant is not subject to any victimisation.

#### 4.6 THE DIVERSITY SYSTEM CUSTODIAN (MD) IS REQUIRED TO:

- Monitor the effectiveness of the Diversity System and its alignment with organisational goals and the desired culture.
- Initiate audits of the system from time to time.
- Design improvements to the system.

#### 4.7 EXCO IS REQUIRED TO:

- Investigate any instances of institutional or systemic discrimination, harassment or bullying.
- Direct appropriate remedial actions to address any breach of the Diversity System.

- Monitor the effectiveness of this system and its alignment with organisational goals and the desired culture.
- Approve changes to the Diversity System.

#### 4.8 THE BOARD IS REQUIRED TO:

Set measurable objectives for achieving gender diversity within the workforce generally and in the composition of the Board and its senior management.

- Review those objectives annually.
- Assess annually the progress in achieving those objectives and ensure that such progress is reported on in the Company's Corporate Governance Statement each year.
- Consider the appropriateness of setting other diversity objectives and periodically review, and assess progress in achieving, any such objectives.

### 5. SUPPORTING DOCUMENTS

- Employment Policy - BPOL001
- Diversity System Description - BSD016
- Diversity Complaints Process - BPR016a
- Complaint Investigation Template - BPR016b
- Fair Treatment Standard – BST010
- Fair Treatment Process – BPR010
- Whistleblower Standard – BST018
- Whistleblower Process – BPR018
- Unacceptable Performance and Misconduct Standard – BST008