



# EEO & Diversity Policy

## 1 Purpose

Ruralco is committed to creating and maintaining a work environment that ensures fairness, equity and respect for social and cultural diversity.

Ruralco recognises the value and benefits to its business, employees and customers that can result from incorporating Diversity into its workplace and business practices.

This policy provides guidelines about acceptable behaviour in the workplace and the responsibilities of employees to promote and uphold the principles of equal employment opportunity (**EEO**) and Diversity. It also seeks to ensure that Ruralco attracts and retains the best people, utilising employees with diverse views and experiences.

## 2 Scope

This policy applies to all employees of Ruralco Holdings Ltd and its subsidiary companies (**Ruralco**) as well as contractors and visitors to Ruralco sites (**you**).

## 3 Policy

This Policy applies to all Ruralco employees, contractors and visitors who are operating under Ruralco policies and procedures. It operates at all company premises and worksites, and other sites where the company conducts business, such as premises and sites operated by contractors, suppliers and customers.

Ruralco is committed to the principles of EEO and Diversity. It is Ruralco's policy to recruit, hire, train and promote employees based on merit without regard to race, colour, religion, age, sex, sexual orientation, national origin, marital status, disability, personal association or any other protected attribute. Ruralco recognises the value that a diverse workforce adds to the company and employs the EEO principles to achieve its diversity outcomes.

This policy may be updated from time to time and the amended policy will apply to you.

## 4 Legislation

Provisions relating to EEO, discrimination, and victimisation are contained in both Federal and State legislation.

### (a) Federal

- *Racial Discrimination Act 1975*
- *Sex Discrimination Act 1984*
- *Australian Human Rights and Equal Opportunity Commission Act 1986*
- *Disability Discrimination Act 1992*
- *Age Discrimination Act 2004*
- *Fair Work Act 2009.*

(b) State

- **New South Wales** - *Anti-Discrimination Act 1977*
- **Queensland** - *Anti-Discrimination Act 1991*
- **South Australia** - *Equal Opportunity Act 1984*
- **Victoria** - *Equal Opportunity Act 2010*
- **Western Australia** - *Equal Opportunity Act 1984*
- **Tasmania** - *Anti-Discrimination Act 1998*
- **Australian Capital Territory** - *Discrimination Act 1991*
- **Northern Territory** - *Anti-Discrimination Act 1996*

(c) The laws set out above prohibit discrimination in, amongst other things, employment on the grounds of the following protected attributes:

- Race, colour, national or ethnic origin, ethno-religious background.
- Sex/gender.
- Marital status.
- Pregnancy or potential pregnancy.
- Disability (including physical, intellectual, psychiatric, sensory, neurological or learning disabilities and illnesses such as HIV/AIDS).
- Age.
- Lawful sexual activity and/or sexual orientation.
- Transgender status.
- Religious belief or activity.
- Political belief or activity.
- Status as a parent or carer.
- Industrial activity.
- Personal association (whether as a relative or otherwise) with an employee or group of employees identified by reference to any of the above attributes.

## 5 Diversity

Diversity in the workplace refers to the uniqueness of and differences between people in the Company.

Diversity encompasses characterises, such as age, gender, sexual orientation, religion, ethnicity, cultural background, marital status, disability, carer's responsibilities or pregnancy.

It also refers to other ways in which people are different, including their skills, knowledge, life and work experiences, education level, socio-economic background and perspectives.

Workplace diversity involves recognising the value of individual differences and managing them in the workplace. Ruralco aims to attract and retain the best people to do the job required irrespective of individual characterises.

## 6 Application of policy

### 6.1 Equal Employment Opportunity

EEO is based on the merit principle. This means that employment and promotions are based on open competition and on an individual's merit. The merit principle aims to ensure that:

- Individuals have an equal opportunity to compete for a position.
- Individuals are judged fairly and without bias, favouritism or discrimination.
- The most suitable person for the position is chosen.
- When assessing a person for a position, only those aspects that are relevant to their ability to perform in employment are considered.

All selection and employment decisions (including remuneration and performance reviews) shall be based on sound criteria which are directly related to performance of work in the position. These criteria include:

- Knowledge;
- Demonstrated skills;
- Previous experience;
- Educational qualifications; and
- Assessed competencies.

Equal opportunity in employment and diversity also means that:

- Based on merit, all employees have equal access to training and development opportunities and are actively encouraged to participate in relevant activities;
- Remuneration decisions should be based on the requirements for the role; and
- Working with individuals to understand their particular needs is important and working to accommodate those needs wherever possible.

## 6.2 Diversity principles

The following guiding principles are aimed at promoting awareness and proactive management practices to achieve workplace diversity. These principles should be applied across all facets of Ruralco's business:

- A diverse workforce is a competitive advantage in retaining and attracting the best people to improve our business performance
- It is everyone's role at Ruralco to promote a work environment that values seeking and utilising the contributions of employees with diverse views and experiences
- We want a skilled workforce that reflects the diversity of our customers, members and communities
- Awareness of the rights and responsibilities of individuals with regard to equity and respect for others is important for all Employees

## 6.3 Responsibilities for workplace Diversity

The Nomination and Remuneration Committee will be responsible for:

- Reviewing and making recommendations to the Ruralco Board on workforce diversity practices;
- Annually reviewing the diversity initiatives set by the business and providing recommendations with regard to diversity initiatives undertaken;
- Monitoring performance on diversity initiatives using appropriate measures and targets and reporting on initiatives;
- Making appropriate disclosure of this policy to shareholders in Ruralco's annual report

All Leadership Teams also have a responsibility for acting in alignment with and updating the principles of this Policy.

## 6.4 What is unlawful discrimination?

Unlawful discrimination involves the unfavourable treatment on the basis of one or more of the protected attributes referred to in Section 4(c) above.

Unlawful discrimination in the workplace can occur in the following contexts:

- Recruitment, appointment and promotion of employees and potential employees;
- The conditions, benefits and terms offered to employees;
- The availability and levels of training offered to employees; and
- The transfer, dismissal or retrenchment of employees.



Unlawful discrimination can be either direct or indirect.

Direct discrimination occurs where an employee treats or proposes to treat an employee with an attribute unfavourably because of that attribute. For example, refusing to interview someone for potential employment because they are of a particular ethnic background is unlawful discrimination.

Indirect discrimination is focused on the impact of rules, practices or policies that are applied equally but have a disproportionate impact on those with particular attributes. Indirect discrimination occurs if:

- An employee imposes (or proposes to impose) a requirement, condition or practice;
- That has, or is likely to have, the effect of disadvantaging employees with an attribute; and
- That requirement, condition or practice is not reasonable.

For example, having a policy where there is an age limit for graduate employment is unlawful discrimination.

## **7 Procedures**

Ruralco has a Grievance Policy and Procedure. Any employee who feels that he or she has been subjected to discrimination or not treated in accordance with EEO principles, harassment, sexual harassment, bullying or victimisation should discuss their concerns with the relevant officer in accordance with the Grievance Policy and Procedure.

Ruralco's Grievance Policy and Procedure is based on confidentiality, procedural fairness, protection from victimisation and prompt resolution. Any complaints of discrimination, harassment, sexual harassment, bullying or victimisation will be dealt with promptly, confidentially and without victimisation of those involved.

Disciplinary action may be taken against employees who breach this policy. Breaches of this policy will be considered to be misconduct or serious misconduct, and in the most serious cases, may result in dismissal.

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