

INCLUSION POLICY

April 2024

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1 PURPOSE

1.1 Purpose

Mirvac's purpose is to 'Reimagine Urban Life.' We believe that to fulfil our purpose we need to reflect the communities we support and the customers we serve. To achieve this, we are committed to fostering a climate that is inclusive, diverse, free of discrimination and providing equal opportunities to actively encourage people to share their knowledge, skills and backgrounds to contribute to the organisation.

This Inclusion Policy document sets out the Mirvac Group Policy with respect to Diversity, Anti-Discrimination, Equal Employment Opportunity (EEO), as well as inclusion. For Mirvac, inclusion represents acceptance and respect of the characteristics that make one individual different to another, resulting in an inclusive workplace culture enabling all employees to contribute and fulfil their potential without barriers.

1.2 Commencement of Policy

This Policy will commence from 18 April 2024. It replaces all other similar policies whether written or not

Mirvac reserves the right to vary, replace or terminate this Policy from time to time.

1.3 Application of Policy

This Policy applies to all employees, including LGBTQIA+ family units, service providers, contractors, and consultants (Workplace Participants) engaged within Mirvac. This Policy does not form part of any employee's contract of employment.

1.4 Review and Approval

This Policy will be reviewed by Human Resources and approved by the MGR Board at least every three years even where no changes have been made during the review. Minor administrative amendments can be approved by the Chief Culture & Capability Officer and/or Group General Manager, Human Resources.

2 POLICY

2.1 Belonging Strategy

Mirvac's Belonging Strategy articulates a vision and key focus areas with supporting initiatives and measures to help track progress over time.

Our Belonging Vision is to build a diverse team and inclusive culture that values the diversity of perspectives and enables our people to safely contribute; realise their potential; respond to our stakeholder's needs and provide Mirvac with a competitive advantage.

To achieve this vision, Mirvac has seven (7) key focus areas outlined in the Belonging Strategy:

1. **Gender** – continue our initiatives to reduce bias and provide equal opportunity for females to contribute and progress their careers at Mirvac. Drive participation in industry advocacy to improve gender representation within the broader property sector.

2. **Caring Responsibilities (Parental)** – maintain market leadership in Parental Leave, Care and Flexibility
3. **LGBTQIA+** - Build on recent initiatives through coordinated focus on LGBTQIA+ to become a visibly inclusive employer
4. **Culture** – Build on Mirvac’s First Nations workforce, community and procurement commitment impact through education and initiatives and build awareness of other ethnicities in our workforce composition, customer base and the communities in which we operate
5. **Women in Construction** – Take a market leadership position
6. **Caring Responsibilities (other)** – A focus on other types of caring responsibilities including elder care, disabilities etc.
7. **Household Types** – SINKS, DINKS, Fur Parents and Everyone Else – We have an opportunity to focus benefits and inclusion to include everyone and respond to Mirvac’s changing demographics.

In addition to our strategic focus areas, several existing people practices incorporate actions to improve diversity and inclusion outcomes:

- **Remuneration** - Mirvac conducts an annual Gender Pay Parity Review to assess gaps at three levels: organisation-wide; by level; and like-for-like. Outcomes from the review inform specific actions required to address gaps.
- **Performance Management** - Mirvac’s performance management system incorporates an assessment of results and behaviours. The rating system explicitly assesses both ‘what’ is achieved and ‘how’ outcomes are delivered. The assessment of ‘how’ incorporates the Mirvac Values. In addition, each business area conducts ‘Calibration’ meetings as part of the finalising end of year performance ratings and this process aims to deliver consistency and fairness in the determination of final individual ratings.
- **Talent and Succession Planning** - The assessment of talent across the organisation specifically reports on gender composition and succession plans are rated on the depth of female representation in the pipeline.
- **Recruitment and Selection** - Mirvac’s Recruitment and Selection Policy stipulates that selection decisions are based on the principle of merit. It encourages equality of opportunity by requiring identified vacant roles within Mirvac to be advertised internally and ‘short-lists’ of potential candidates for senior roles must contain at least 50% women.
- **Culture**- Mirvac is committed to protecting the health, safety and wellbeing of its employees and preventing discrimination and harassment. New employees are provided with information and fact sheets on Bullying & Harassment Prevention and are required to complete an online module on Bullying and Harassment Prevention as part of their mandatory compliance activities.

2.2 Equal Employment Opportunity and Anti-Discrimination

Equal Employment Opportunity (EEO) laws apply to all areas of employment, as well as the provision of goods and services. Mirvac expects all Workplace Participants to comply with all Federal, State and Territory EEO and Discrimination legislation and this Policy.

Mirvac is committed to complying with its positive duty to take reasonable and proportionate measures to eliminate, as far as possible, sex discrimination, sexual harassment, or harassment on the ground of sex, a hostile workplace environment and victimisation.

Discrimination

Direct discrimination in employment occurs when a person is treated less favourably than another in their employment because of a reason or ground which is prohibited by law. Mirvac requires all Workplace Participants to act in a manner that does not breach any or all of the prohibited grounds of discrimination detailed below regardless of whether the prohibited grounds are set out in Federal, State or Territory anti-discrimination laws. A full list of the grounds of discrimination is listed below.

- Race (including colour, nationality, descent, ethnic, ethno-religious or national origin)
- Sex
- Pregnancy (including potential pregnancy)
- Carers' responsibilities, family responsibilities, carer or parental status, being childless
- Breastfeeding
- Physical features
- HIV/AIDS
- Spent convictions
- Association (i.e. association with a person who has one or more of the attributes for which discrimination is prohibited)
- Intersex (individuals born with any of several sex characters)
- Religious belief, affiliation, conviction, or activity
- Marital status, domestic status, relationship status
- Homosexuality, transsexuality, sexuality, sexual orientation, lawful sexual activity, gender identity, inter-sex status
- Disability/impairment, including physical, mental and intellectual disability
- Age (including compulsory retirement)
- Profession, trade, occupation or calling
- Association with a child (in customer service)
- Gender history
- Gender identity (which gender someone identifies with)
- Religious appearance or dress (in work or study)

Indirect discrimination occurs when an employer imposes a policy, requirement or condition which appears to apply to everyone equally but it in fact operates to disadvantage a particular group because of a characteristic of that group, such as their sex, age, race (i.e., a prohibited ground of discrimination).

Vilification

Vilification is a public act which incites hatred, severe contempt or ridicule of a person or group, because of race, homosexuality, transgender, transsexuality or other characteristics. Vilification is also unlawful.

Employee Obligations

Mirvac treats all reported complaints of unlawful behaviour as a serious matter and applies the Mirvac Grievance Resolution Procedure in resolving complaints or allegations.

Where a Workplace Participant is confronted by an issue which they believe to be contrary to diversity principles, anti-discrimination or EEO laws or this Policy, they should in the first instance try to address the issue directly with the person involved, if appropriate. If for any reason they don't feel comfortable in doing this they should raise the issue with their immediate manager, a Human Resources Manager or anonymously by telephoning the Open Line Hotline on 1300 790 228.

Inclusion Policy

Policy Authorised by: MGR Board on 18 April 2024

Policy Maintained by: HR

Version Number: 4.0

A breach of this policy may be subject to disciplinary action. In serious cases this could include termination of employment. Workplace Participants may be held responsible for any unlawful conduct. In addition, Workplace Participants who aid, abet or encourage other persons to engage in unlawful conduct, may also be subject to disciplinary action.

If a Workplace Participant is unsure about any matter covered by this Policy, they should seek the assistance of their Human Resources Manager.

Compliance Requirements

The Group intends to comply with the ASX Corporate Governance Principles and Recommendations (“ASX Principles”) relating to diversity.

Accountability

Reporting and accountability in the terms of this Mirvac’s Diversity & Inclusion Strategy will be a periodic item on the Board Human Resources Committee Agenda.

3 Version History

Version Number	Review Date	Approval Date	Comments – key changes
1.	April 2019		This Policy will commence from 1 April 2019. It replaces all other similar policies whether written or not.
2.	March 2023		
3.	March 2024	18 April 2024 – MGR Board	Minor updates have been made to the policy to explicitly state our commitment to gender equality and reflect current HR titles and employee resources available.