

Inclusion Policy

June 2025

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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.

This Inclusion Policy document sets out the Mirvac Group Policy and is created to facilitate and support an inclusive work environment that encourages and recognises each other's individual differences. Differences may include age, cultural background, disability, ethnicity, gender, identity, marital status and sexual orientation. Differences also refers to less obvious aspects such as education, socioeconomic background, faith, family and personal responsibilities, thinking styles and experience.

1.2 Commencement of Policy

This Policy will commence from 14 August 2025. 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+ families, 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 two 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

1.5 Belonging Vision, Focus Areas and People Practices

Mirvac is committed to supporting and ensuring a safe working environment in which everyone is treated fairly and with respect.

We are committed to creating a workplace where everyone belongs and feels comfortable to bring their full selves to work. 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 six (6) key areas of focus:

1. Flexibility – Mirvac is committed to leveraging the true power of flexible work in action, and this is something we will continue to prioritise going forward
2. Safe and Respectful Workplace – At Mirvac we have zero tolerance when it comes to sexual harassment and bullying,
3. Reconciliation – We continue to work to meaningfully embed reconciliation in the way we do business through our Reconciliation Action Plan
4. Families and Care – As a family friendly workplace, Mirvac continues to offer support and benefits to all of our people, including those with caring responsibilities
5. Gender – Mirvac supports transparent gender pay gap reporting in Australia and the equality that this sets out to achieve in our organisation and industry. We are committed to narrowing the gap by encouraging a better balance of gender at all levels across our organisation.
6. Pride (LGBTQ+) – create and maintain a safe and inclusive environment for all position us as a visible inclusive employer in the Australian market

In addition to these areas of focus, 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. . People leaders are required to consider equitable outcomes when making remuneration decisions
- > 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 Mirvac's 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 Identification, Development and Succession Planning - We provide equal opportunities for professional development and succession opportunities. Diversity, including gender, is considered when identifying learning and career development opportunities including promotions and role changes. 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 uses a variety of methods to ensure specific roles and departments consider gender in their shortlists.

The MGR Board & Nomination Committee are committed to proactive succession planning & renewal to ensure the Board achieves, and best leverages, the advantage of having a mix of skills, experience, attributes, independence & diversity (including gender) to support & provide strategic direction.

- > 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 that includes training on Bullying and Harassment Prevention as well as the expectations of safe and respectful workplace behaviour as part of their mandatory compliance activities.

1.6 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, and whether the employee identifies as Aboriginal and/or Torres Strait Islander)
- 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)
- Religious belief, affiliation, conviction, or activity, including religious appearance or dress (in work or study)
- Marital status, domestic status, relationship status
- Sexuality, including homosexuality, transsexuality, sexual orientation, lawful sexual activity, gender identity
- 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 identity or gender history (which gender someone identifies with or has previously identified with)

- Intersex status (including people who are born with physical sex characteristics that don't fit typical definitions of male or female bodies.)

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 or other characteristics. Vilification is also unlawful.

Employee Obligations: Speaking Up

As part of our commitment in eliminating disrespectful workplace behaviour, Mirvac treats all reported complaints of such behaviours as a serious matter.

Every workplace participant has a role to play in maintaining a safe and inclusive culture, including being an active bystander. Reports can be made by any person(s) directly impacted, or by others who observe or who are aware of disrespectful workplace behaviours occurring.

An active bystander is someone who not only observes a situation but takes steps to speak up or intervene when they witness actions that are inappropriate, harmful, or could lead to negative consequences. The active bystander approach is a crucial component of our workplace culture, and all employees are encouraged to embody these principles.

Multiple reporting options are available to ensure you can speak with whomever you are most comfortable including anonymously if preferred. See Mirvac's Respectful Workplace Behaviours Policy for more information.

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 Director or anonymously via the 24/7 online report process or by telephoning the Open Line Hotline on 1300 790 228.

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 Belonging Strategy will be a periodic item on the Board Human Resources Committee Agenda.

3 VERISON 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.
4.	June 2025	June 2025 MGR Board	Alignment to Respectful Workplace Behaviour policy with speaking up. MGR Board accountabilities in relation to recruitment and selection of new Directors explicitly stated.