

BST016 - Rev 1 – 5 August 2015

Base values and encourages a diverse workforce and provides a work environment in which everyone is treated fairly, with respect and can realise their full potential. While respecting different cultures, traditions and employment practices, we share common goals and a unifying set of beliefs and behavioural expectations in the “Base Way”.

1. PURPOSE

The overall purpose of the Diversity System is to encourage a diverse workforce and to ensure that people from diverse backgrounds can work together free from discrimination and harassment.

The purpose of this document is to:

- Give effect to the Employment Policy and establish the limits of discretion in relation to diversity.
- Set out the express responsibilities of Base and its employees in relation to diversity.

2. REQUIREMENTS

Equal Opportunity in Employment:

Base and its subsidiaries 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 and will comply at all times with equal opportunity employment and anti-discrimination requirements.
- 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.
- Remuneration decisions will differentiate on the basis of merit and labour market pressure.

Discrimination:

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

- race
- colour
- sex
- religion
- political opinion
- nationality
- ethnic or social origin
- pregnancy
- HIV status
- trade union membership, non-membership or lawful union activity
- age
- sexual preference
- marital status
- physical or mental disability
- carer responsibilities

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Harassment:

The Base workplace will be free from harassment. The company will not permit inappropriate treatment of any employee by managers or co-workers 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 employees at work.

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, clients or the public.

Process Requirements:

- Where possible, employees are required to seek to resolve issues directly with their manager.
- When this is not possible, a discrimination, harassment or bullying complaint can be made using the Base Fair Treatment Process or by utilising the "Integrity in Action" Whistleblower System.
- A Base Fair Treatment review can be initiated by requesting one in writing from the manager-once-removed, or if he/she is implicated in the complaint to the manager-twice-removed or to an EXCO member.
- In the first instance, HR Department can assist with writing a complaint or understanding the process.
- The name of the complainant and the circumstances of the complaint will not be disclosed to any person except where 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 fashion following the investigation.

Disciplinary Action:

- Instances of bullying, discrimination and harassment are punishable via disciplinary action, which may include dismissal.
- Disciplinary action will be as per the Unacceptable Performance and Misconduct Standard.

All managers are required to:

- Take all reasonable steps to ensure that the workplace is free of discrimination of any kind.
- Ensure that complainants or witnesses are not victimised in any way.
- Report allegations of discrimination, harassment or bullying immediately to their manager.

The manager-once-removed is required to:

- Ensure that complainants or witnesses are not victimised in any way.
- Investigate all allegations in a timely fashion in accordance with the Fair Treatment Process.

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- 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.

All employees are required to:

- Encourage diversity in the workplace and foster a work environment in which everyone is treated fairly.
- Actively attempt to resolve any issues that arise.
- Address any concerns or grievances directly with their manager wherever possible.
- Utilise the Fair Treatment Process without delay when they are the victim of unlawful discrimination, harassment or bullying in the workplace, or utilise the “Integrity in Action” Whistleblower System.

Fair Treatment and Diversity Contact Officers are required to:

- Listen to the employee’s diversity complaint.
- Advise them on how to initiate the Fair Treatment Process.
- Assist them with preparation of a written complaint, if required.
- Accompany the employee into interviews and meetings if required for support, but without playing a ‘representative’ role.

The Diversity System Driver (HR Manager) is required to:

- Develop a diversity education programme and ensure all employees understand what behaviour is not allowed and how to raise a complaint.
- 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.

The Diversity System Custodian (MD) is required to:

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

The 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 system.
- Monitor the effectiveness of this system and it’s alignment with organisational goals and the desired culture.
- Approve changes to the system.

The Board is required to:

- Establish measurable objectives for achieving gender diversity within Base and its subsidiaries.
- Review those objectives annually.
- Assess annually the progress in achieving those objectives.

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3. SUPPORTING DOCUMENTS

- Employment Policy (BPOL001)
- Diversity System Description (BSD016)
- Diversity Process (BPR016a)
- Complaint Investigation Template (BPR016b)