



Diversity Policy

**GDI Property Group (“GDI”)
GDI Property Group Limited (ACN 166 479 189)
GDI Funds Management Limited (ACN 107 354 003)**

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1. Diversity Policy

The Board and senior management of GDI Property Group (GDI) are committed to developing a corporate culture that is conducive to the appointment of well qualified employees, senior management and board candidates so that there is appropriate diversity to maximise the achievement of our corporate goals.

Diversity in this context covers gender, age, language, ethnicity, cultural background, political views, sexual orientation, religious belief and family responsibilities. Diversity also refers to the other ways in which people are different, such as educational level, life experience, socio-economic background, personality and marital status. Workplace diversity involves recognising the value of individual differences and managing them in the workplace.

In Australia there are a large number of laws (both State and Federal) that create obligations for GDI relating to workplace diversity. These laws are often referred to collectively as Equal Employment Opportunity (EEO) or Equal Opportunity (EO) laws.

They include:

- Laws that make it unlawful to discriminate against a person on certain prohibited grounds (e.g. gender, age, race and religion)
- The Equal Opportunity for Women in the Workplace Act 1999 which requires employers, with 100 or more employees, to develop a workplace program designed to eliminate discrimination against women, and promote equal opportunity for women in the workplace
- The ASX Listing Rules and ASX Corporate Governance Principles and Recommendations that require the Board, or a committee of the Board, of ASX listed entities to:
 - a) Establish and disclose a diversity policy;
 - b) Establish measurable objectives for achieving gender diversity in the composition of its board, senior executives and workforce generally; and
 - c) Assess and disclose annually, both the measurable objectives for achieving gender diversity, the progress in achieving them and the respective proportions of men and women on the board, in senior executive positions and across the whole workforce.

ASX listed entities, either need to comply with each of these recommendations, or if they do not, they need to disclose why not, in their annual report.

GDI considers the benefits of implementing a diversity policy include:

- Expanding the recruitment pool;
- Development of human capital;
- Increased productivity and financial performance;
- Corporate reputation; and
- Compliance with legal and social expectations.

2. Our commitment – measures designed to promote diversity

GDI's commitment to promoting diversity is demonstrated by the following measures that have been established and implemented within GDI:

Measures designed to promote diversity within GDI

- This Diversity Policy;
- A Code of Conduct;
- Clear articulation of required standards of behaviour that supports diversity;
- A detailed recruitment and selection program for senior management and staff that reflects our commitment to diversity;
- A consistent approach in dealing with conflicts in the workplace, internal complaints about the work environment, as well as issues of misconduct or poor performance;
- Procedures designed to deal with any workplace bullying or violence;
- Policies designed to help parents balance their work, life and family responsibilities through the provision of flexible work options;
- The opportunity for parents on extended parental leave to maintain their connection with GDI;
- An internal training program that covers diversity related issues;
- The availability of an executive development and mentoring program which supports the promotion of talented women into senior management and board positions, and provides them with professional networking opportunities;
- Targeted professional programs aimed at helping women to develop skills and experience that prepare them for senior management and board positions;
- Publication of the diversity policy on GDI's public website; and
- Publication in the annual report of:
 - The relative proportion of women and men at all levels of the organisation;
 - The measurable objectives for achieving gender diversity; and
 - The progress that has been made towards achieving the measurable objectives.

Specific measures designed for promoting gender diversity

- A Board Charter that requires the full board to consider and approve a diversity strategy;
- A Nomination and Remuneration Committee Charter that requires that committee to consider diversity issues in the board selection process and review, at least annually;
 - The relative proportion of women and men at all levels of the organisation;
 - The measurable objectives for achieving gender diversity; and
 - The progress that has been made towards achieving the measurable objectives.
- Board and committee performance evaluation procedures which include consideration of the Board's management of its diversity strategy.

Responsibility for administering GDI's Diversity Policy has been delegated to management, with oversight from the Chair of the Nomination and Remuneration Committee.

The Chair of the Nomination and Remuneration Committee will assist management to:

- Develop a diversity policy and strategy which is suitable to an organisation of GDI's size, nature and complexity;
- Collect and analyse data with respect to diversity within GDI;

- Oversee the implementation and execution of this Diversity Policy;
- Recommend measurable objectives for achieving gender diversity and monitor these objectives;
- Provide training to the Board, Senior Management and staff with respect to diversity issues;
- Promote a culture of diversity;
- Review existing policies and procedures with regard to diversity objectives;
- Report to the Board on diversity issues.

3. Establishing measurable objectives for achieving gender diversity

The Board has approved the following methodology to establish measurable objectives for achieving gender diversity and, on an annual basis, to review these objectives and GDI's progress in achieving them.

Step 1 – Defining Types of Measurable Objectives

GDI has identified the following types of measurable objectives for gender diversity:

- Implementation of programs / initiatives designed to enhance gender diversity (e.g. employee surveys, mentoring programs, specific training)
- Introduction of procedural / structural objectives (e.g. enhance reporting processes, introduction of a third party to assist in director interviews and selection)
- The establishment of targets for gender diversity at three levels of the organisation:
 - Board members
 - Senior executives
 - All staff

GDI may utilise some or all of these objectives in accordance with its diversity strategy.

Step 2 – Current Situation Analysis

An assessment with respect to current gender diversity levels and company initiatives is undertaken at least once every 12 months providing data from which measurable objectives for gender diversity can be established.

Step 3 – Setting Measurable Objectives for Gender Diversity

Using the data obtained in Step 2, the Board will set objectives for gender diversity with established timeframes.

Step 4 – Defining Types of Measurable Objectives

Progress towards achievement of gender diversity objectives will be reviewed once every 12 months, with the results of progress, as well as the proportion of women employees in the whole organisation, women in senior executive positions and women on the Board disclosed in our annual report.

4. Review and continuous improvement

This Diversity Policy will be reviewed for effectiveness periodically.

Approved by the Board on 21st September 2022