

EQUALITY AND DIVERSITY POLICY

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1. Benefits

The Company believes that a diverse and inclusive workforce at all levels of the organisation makes good business sense and will ultimately deliver superior results, a competitive edge and an increase in market share through:

- capturing a broader talent pool of high quality Employees;
- ongoing Employee retention;
- accessing different perspectives with a breadth and depth of experience;
- improving our understanding of, and service to customers; and
- underpinning our Company purpose of ‘Helping People Reach Home’.

The Company recognises these benefits and is dedicated to sustaining a work environment that respects individual differences and promotes equality and diversity at all levels of the Company to enhance organisational performance and effectiveness.

2. Background

The Company recognises that our people are our greatest asset. Villa World’s purpose statement, **Helping People Reach Home**, is supported by a commitment to six core beliefs, designed to ensure that the company’s culture is maintained and strengthened through adherence to agreed behavioural standards.

HELPING PEOPLE REACH HOME

“Home is more than a place... It’s a feeling, a sense of belonging. It’s where the heart is”

- Ensuring our people feel “at home” by helping them develop to their full potential while providing a safe, healthy and happy workplace
- Helping our customers find their dream home and making the process of buying that home easy
- Recognising the broader societal contribution we can make to better living for our community
- We’re proud of the partnerships we have forged with stakeholders who share our beliefs and feel “at home” working with us

We aim to attract and retain people with diverse skills, experience, qualifications and backgrounds. A Board, management and workforce that reflects the diversity of our customers and communities will better enable the Company to create exceptional homes and communities that deliver uncompromising quality and affordability, whilst delivering value to our shareholders.

The Company is committed to fostering a corporate culture that embraces diversity, respects people as individuals and values their differences. We aim to create an environment that is fair and flexible whilst promoting personal and professional growth where people are encouraged to succeed to the best of their ability.

3. Purpose

The purpose of this policy is to:

- Actively endorse our company Purpose and live our beliefs by promoting a fair, equal, respectful and inclusive workplace culture free from unacceptable behaviour by setting out relevant workplace participant obligations;
- set out the framework for establishing and measuring the Company’s diversity and equality objectives and reporting requirements; and
- provide the standard and guide for workplace policies and procedures at local levels of the Company.

Primary drivers to increasing the focus on overall equality and diversity are:

- Diversity in the workplace and on leadership teams is a critical success factor in making better decisions and developing more innovative business solutions;
- Research shows that groups with diverse perspectives and flexibility in thinking almost always outperforms homogenous groups in the business environment and lead to higher level of creativity, innovation and organisational agility;
- Gender Equality is increasingly viewed as a baseline feature of well managed organisations in Australia;
- Gender equality facilitates a greater business understanding of how to appeal to both genders as customers and what products and services women and men need and want. This should help organisations create new markets as well as increase market share;
- A demonstrated focus on overall diversity enables an organisation to attract and retain the best talent, to build a high performance workforce and minimise the cost of employee turnover.

4. Commencement and review

Policy and version number:	HR6.5v2
Authority and date adopted:	By resolution the Board of Directors adopts the following policy and it will commence from 26 October 2016. It replaces all other earlier policies in existence (whether written or not) regarding this subject matter.
Date last reviewed:	7 February 2019
Date of next review:	The policy will be reviewed on 7 February 2021

5. Application of Policy

This Policy applies to all Villa World directors, executives, management and human resources personnel.

This Policy may be subject to change from time to time at Villa World’s discretion.

This Policy is not contractually binding and does not form part of any Employee’s contract of employment.

6. Definitions

Characteristics means a workplace participant’s attributes and experiences and includes but is not limited to cultural and ethnic backgrounds, national extraction, gender, age, family or carer’s responsibilities, sexual orientation/identification, marital status, physical or mental disability, religious beliefs, political opinion/activity, educational level, union activity or association and other experiences present among Villa World workplace participants.

Company means Villa World Limited and all of its related and associated entities.

Employee means an individual who is directly engaged and paid by the Company as an employee. This includes employees engaged on a permanent, part-time or casual basis.

Equality means the principle of affording workplace participants fair and equal opportunities in recruitment and selection, performance reviews, remuneration, career development and training, transfers, promotions and succession planning, and termination of employment, without regard to the workplace participant’s Characteristics.

Diversity refers to a workforce which displays a diverse range of Characteristics.

Other Stakeholders collectively refers to any individual who is not an Employee but who carries out work (whether paid or unpaid) for the Company, including (but not limited to) work as a contractor, secondee, consultant or subcontractor, labour hire company, an apprentice or trainee, a student gaining work experience, volunteers including employees of any Other Stakeholder.

Unacceptable Behaviour includes, but is not limited to behaviour which has or has the potential to create a health and safety risk and/or to bring the Company into disrepute; and/or any behaviour which involves discrimination, vilification, sexual harassment, bullying, prejudice and victimization as it is defined and explained in this Policy.

Workplace Participants collectively refers to both Employees and Other Stakeholders.

7. Equality and Diversity objectives

7.1. Board objectives

The Company’s Board of Directors, on the recommendation of the Remuneration and Nomination Committee, is responsible for:

- (a) establishing objectives for diversity across the Company's workforce, including measurable objectives for gender diversity; and
- (b) monitoring, assessing and reporting annually on the Company's achievement against those diversity objectives; and
- (c) reviewing diversity objectives to ensure objectives remain appropriate for the Company.

7.2. The Remuneration and Nomination Committee

- (a) The Remuneration and Nomination Committee (RNC) meets quarterly to discuss diversity strategy and progress towards meeting objectives. The RNC works closely with senior leaders, the business and Employees to implement and manage diversity programs and initiatives to support the diversity strategy and objectives.
- (b) The RNC also conducts reporting on the objectives and progress made against each objective on an annual basis, with the final results disclosed in the Annual Report. The Annual Report will also include information on the proportion of female Employees in the Company, women in senior executive positions (that is, direct reports to the Managing Director/Chief Executive Officer), women on the Board and the remuneration gender pay gap.

7.3. Framework to support diversity initiatives

- (a) **Recruitment and selection:** The Company is committed to following a high quality recruitment and selection process for all vacancies. The process is outlined in the Recruitment and Selection Policy which ensures:
 - (i) roles are broadly advertised to maximise the breadth of applicants, including an opportunity for existing Employees to apply;
 - (ii) the selection process is open and free from prejudice; and
 - (iii) diversity is considered when short listing candidates.
- (b) **Equal Employment Opportunity:** The Company is committed to providing all Workplace Participants with a work environment free from Unacceptable Behaviour. The Equal Opportunity Policy overarches all other corporate policies to promote a work place that provides equal opportunities in all employment related activities.
- (c) **Training and development:** This policy will be taken into account when considering training and development opportunities for Employees. The Company adopts a consultative approach with Employees in formulating individual career development objectives and consideration will be made with regards to equality and Characteristics in deciding appropriate training and development.
- (d) Career advancement and succession planning also forms a key focal point of annual Employee performance reviews in accordance with the My Success Plan Policy.
- (e) **Flexible work arrangements:** The Company will encourage opportunities for flexible working arrangements. This policy and an Employee's Characteristics will be taken into account when considering and deciding opportunities for flexible work arrangements. These arrangements provide support for Employees seeking to balance competing demands outside work, and to maximise the talent pool of applicants who are available to fulfil roles at all levels of the Company's operations.
- (f) **Pay equity:** As part of the annual remuneration review process, the Company reviews pay equity across the Company and against industry standards.

- (g) **Baby bonus:** The Company is committed to creating a workplace where parents can take time off work to care for their child and balance the demands of their work and family responsibilities. Accordingly, in addition to any government parental leave entitlements, the Company pays all eligible Employees a 'Baby Bonus' of \$1,000.00 to assist with the expenses related to having a new child.
- (h) **Surveying:** In addition to all formal policies, the Company utilises the services of an external consultant to undertake confidential surveys of all Employees on a semi-annual basis. The survey focuses on a range of topics including workplace culture and any matters which may negatively affect the Company achieving its overall diversity.
- (i) **Equality and diversity legislative compliance:** The Company will comply with its obligations under applicable equality and diversity legislation eg *Workplace Gender Equality Act 2012* (Cth).

8. Equal access to employment opportunities

The Company aims to comply with and promote all laws governing equal employment opportunity applicable in the jurisdictions in which the Company operates.

It is also the Company's policy to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – being the skills, experience, qualifications and potential of the individual connected to the job - without regard to Characteristics or any other classifications or attributes protected by applicable law.

This approach also applies to the selection of Company Directors as outlined in the RNC Charter.

9. Company Responsibilities

Executives, management and human resources personnel are required to:

- act in a balanced, non-discriminatory manner when making employment-related decisions in relation to Employees and Workplace Participants;
- be aware of, and account for, unconscious biases and work practices which may lead to exclusion of various groups or have unintended discriminatory consequences; and
- adhere to applicable local policies and procedures and legislative requirements.

10. Related

Related to this policy	
Related policies	<ul style="list-style-type: none"> • Remuneration and Nomination Charter • Code of Conduct • Domestic Violence Policy • Flexible Work Arrangements Policy • Parental Leave Policy • My Success Plan Policy • Recruitment and Selection Policy • Remuneration Policy • Training and Development Policy • Whistleblower Policy • Workplace Behaviour Policy

Related/relevant forms or other organisational documents	<ul style="list-style-type: none"> • Workplace Gender Equality Agency On-line Reporting
Related legislation/statutory entitlements	<ul style="list-style-type: none"> • Anti-Discrimination Commission • ASX Corporate Governance Council Principles and Recommendations • Australian Human Rights Commission • Australian Institute of Company Directors • Diversity Council Australia • Workplace Gender Equality Agency

11. More Information

If you have a query about this policy or need more information please contact the Organisational Development Manager.