



Diversity and Inclusion Policy

Costa Group Holdings Limited ACN 151 363 129 ("**Company**")

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1 Diversity and Inclusion at Costa

1.1 Our commitment

Costa is committed to creating and ensuring a diverse and inclusive work environment in which everyone is treated fairly, with respect and dignity. Our commitment to this policy contributes to achieving Costa's objectives and embeds the importance and value of diversity and inclusion within our culture.

Diversity and inclusion enhances employee retention, improves Costa's corporate image and reputation, broadens the pool for recruitment of high-quality employees, and fosters a closer connection with and better understanding of the communities we operate in. We know that people are more innovative, productive and engaged when they can bring their 'whole self' to work. It is important that Costa attracts, retains and motivates employees from the widest possible pool of talent to deliver upon our mission and strategic priorities.

- (a) We strive to recognise and celebrate our diversity in all its dimensions and grow our workforce and management to reflect the diversity of the societies we live and work in.
- (b) We aim to provide opportunities that allow individuals to reach their full potential. We will actively encourage those practices and procedures that enable employees to contribute to the best of their ability.
- (c) We aim to develop and promote a workforce based on inclusion where individuals are respected, supported and provided with appropriate opportunities at all levels of the organisation.
- (d) We recognise the differing needs at different stages in life, e.g. study, family responsibilities and retirement and endeavour to support and accommodate individuals' changing life needs
- (e) Non-inclusive or discriminatory attitudes or behaviours are not accepted in any form. We will treat seriously any instance of behaviour that is inconsistent with Costa's values and confront attitudes based on inappropriate stereotypes (See Costa Code of Conduct).

1.2 Who this policy applies to

This policy applies to all employees, contractors, consultants and associates of Costa, including board members, across Costa's Australian and International Operations in relation to:

- a) Behaviour at the workplace
- b) Conduct outside the workplace or working hours if the acts or omissions:
 - i. Are likely to cause serious damage to working or professional relationships
 - ii. Are incompatible with a person's duty to Costa or employment relationship or engagement
 - iii. Damage or are likely to damage Costa's interests or reputation

If there is an inconsistency between (regional) legislative requirements and this policy, the (regional) legislative requirements will take precedence. In other words: this policy will apply unless it results in a breach of local legislation.

2 What diversity and inclusion means to us

2.1 What is diversity?

Diversity refers to the various characteristics that make individuals unique and different from each other.

Diversity encompasses differences in backgrounds, knowledge, qualifications and experiences, and differences in approach and perspectives. Some of the individual characteristics of diversity include gender, age, disability, ethnicity, marital or family status, socio-economic background, religious beliefs or other ideologies, cultural background, nationality, sexual orientation, gender identity, sexual preference, language, life or work experience and other areas of potential difference.

2.2 What is Inclusion?

Inclusion is creating an environment where people, regardless of identity, are respected, valued and connected, where they are safe, feel they 'belong' at Costa, and can progress and contribute to Costa's success.

Inclusion occurs when a diversity of people:

- are valued for their differences;
- are being respectful in interactions with each other, our stakeholders and the community
- value and are open to the opinions, backgrounds, beliefs and input from others and be curious to learn from others
- have opportunities to develop their career and progress based on merit; and
- can contribute their talents to Costa.

Diversity should be promoted by recognising the value in individual characteristics and understanding how best to manage them within the workplace.

Engaging and embracing a diverse and inclusive workforce is an important facet of our business imperative. We all should be one team and leverage our diversity.

2.3 Gender diversity

Costa has a strong commitment to gender diversity and the fundamental principle that any gender is able to participate and feel included in our workforce (incl. management, senior executive and Board).

In order to close historical gender pay gaps, Costa's focus on gender equality includes an expectation for our leaders to be committed to provide opportunities that allow women to reach their full potential.

To achieve greater gender diversity, it is important to ensure that our pool of (potential) available talent is nurtured and developed effectively. Early identification and development of talented women is of significant importance in ensuring that there are appropriately qualified and experienced women for consideration when positions become available.

Costa aims to grow the number of women performing senior roles and ensure that all decisions in relation to recruitment and selection, training and development and flexible work arrangements are based on merit, fairness and individual and organisational requirements.

2.4 Cultural, religious and ethnic diversity

Costa operates in multicultural societies, and we recognise that we have a culturally, linguistically and racially diverse workforce. We understand that our employees can provide a variety of perspectives and experiences. This cultural diversity doesn't limit our opportunities, it grows them through greater innovation and productivity.

Costa encourages our people to increase their cultural awareness in order to promote greater respect, understanding and acceptance of cultural traits and social norms. At Costa, we respect and recognise that people may desire adjustments to ensure their faiths can be acknowledged, understood and celebrated, and are open to discussing changes in holidays or working arrangements to try to ensure people can celebrate and take off their holy days.

At Costa, we expect our people to both:

- respect and uphold local cultural laws and values
- let others express/live their culture as they choose

At Costa, we respect the right of Indigenous people in communities across the world, and Costa commits to regularly review our policies and practices to ensure Indigenous inclusion.

2.5 Ability not disability

When we employ and promote people, we consider ability and not disability. We aim to create an inclusive environment that supports people and removes artificial barriers from the workplace, and raise awareness of accessibility. It is important to note that each person's experience of disability is unique and multi-dimensional. Impairment of functioning can be experienced in a physical, psychological, and social capacity. Costa is committed to support functioning, and coping in day-to-day work with reasonable adjustments, appropriate supports and services.

2.6 Work and life balance

Costa understands our employees' diversity extends to their lifestyles and personal circumstances, and believes in assisting employees to maintain a healthy and holistic balance between work, family, domestic responsibilities and other commitments, activities and interests.

Costa encourages a range of flexible working options to support our people's diverse personal circumstances. To the extent that it is reasonable, we must accommodate the needs of our people who may be vulnerable at any point of their career or life stage, aiming for sustained performance and retention (see Flexible Work Arrangement Policy).

3 How we promote diversity and inclusion

Costa is committed to an inclusive workplace that embraces and promotes diversity as part of our corporate culture. This involves providing supportive and inclusive diversity-related workplace policies, programs and practices within our organisation along with reviewing the performance of these measures annually against a set of measurable objectives set by our board. The initiatives and areas of focus at Costa are included below.

3.1 Communication and Training

- (a) Promote diversity as an important strategic and cultural factor to achieve business objectives across the business.
- (b) Ensure appropriate training is provided to understand the intent and content of this policy, particularly to staff who recruit, hire, select and manage workers.

- (c) Communicate to our employees the importance of understanding and recognizing different types of unconscious biases and considering ways to reduce their impact.
- (d) Disclose our measurable objectives for achieving gender diversity and our progress towards achieving them on an annual basis, in accordance with disclosure requirements such as the Workplace Gender Equality Act (Australia) and other diversity related standards.

3.2 Data analysis and objective setting

- (e) Compile information about our diversity demographics;
- (f) Consult with employees on issues concerning diversity and inclusion, in particular gender equality, including through D&I Reference Group forums and surveys.
- (g) Set objectives to achieve diversity and inclusion, particularly with the aim to grow the representation of women in senior management positions and on the governing body (Board);

3.3 Optimising of talent practices

- (h) Provide equal opportunity in respect to employment and employment conditions, including:
 - recruitment and selection;
 - training;
 - career advancement

We also seek to provide employment and development opportunities for under-represented segments of the communities that Costa operates within.

- (i) We ensure the recruitment process:
 - is accessible to all candidates by advertising positions both broadly and in specific publications;
 - uses professional and inclusive recruitment services where required;
 - follows a standard process to avoid unconscious biases, such as panel interviews, usage of interview guides and templates (as per Costa's recruitment and selection policy).
 - offers and considers flexible work arrangements within requirements of the role, to ensure there is no direct or indirect discrimination throughout the process;
- (j) Evaluate the average and median remuneration of women and men on at least a yearly basis, and where possible, make adjustments to ensure equal remuneration between women and men - to close the gender pay gap.
- (k) Manage unconscious biases in performance and talent processes, such as appointments/promotions, projects, development opportunities, and evaluations.
- (l) Offer and promote flexible work practices (i.e. varied employment terms, flexible working arrangements, and support) that will assist staff with different responsibilities outside of work (e.g. those needing to provide support for family and/or have caring responsibilities), to meet those responsibilities at those particular points in time

- (m) Regularly review Costa's diversity and inclusion policies, processes and frameworks, including those concerning remuneration, recruitment, and recognition/reward.

3.4 Taking action on unacceptable behaviour

- (n) At Costa, unacceptable behaviour such as discrimination and harassment will not be tolerated. Costa encourages employees to report any concerns of unacceptable behaviour (see Complaints Policy and Procedure).

3.5 Setting expectations for visitors, partners, stakeholders, and third-party providers

- (o) Leverage our expectations of diversity and inclusion in improving customer, visitor and stakeholder interactions. This means educating and advocating for respectful and safe interactions to enhance our communities.
- (p) Collaborate with our supply chain to promote diversity and inclusion in their businesses, which includes an evaluation of the approach towards gender equality and indigenous representation.

3.6 Board and Senior Executive composition

- (q) Diversity of gender and background are two important criteria that are considered in developing succession plans and appointment processes, including for our Governing Body (Board) and senior executive positions. Costa aims to achieve our diversity objectives, in particular regarding the number of women in senior executive positions and encourages our owners to aim for a 40/40/20 gender balance goal for our Governing Body (Board).

4 Roles and responsibilities

Persons covered by this policy are required to:

- a) comply with this policy as lawful and reasonable directions;
- b) comply with any applicable law;
- c) not directly or indirectly engage in or aid, abet or encourage behaviour in breach of this policy/law; and
- d) meet their duty of care obligations and be accountable for their own safety and the safety of others at the workplace.

Managers/supervisors are required to:

- a) promote this policy within their area of responsibility; and
- b) take reasonable steps to ensure that any potential breaches of this policy are identified, taken seriously and acted upon appropriately.

Employees are required to utilise the Complaint Policy and Procedure if they reasonably suspect anyone in the workplace has engaged or are engaging in breaches of this policy or the law. However, complaints which are vexatious, frivolous or otherwise not made in good faith will constitute a breach of this policy.

5 Relevant policies

This policy operates in conjunction with the following organisational policies:

- Code of Conduct
- Complaints Policy and Procedure
- Behaviour Standards Policy
- Equal Opportunity Harassment and Bullying Policy
- Flexible Work Arrangement Policy
- Recruitment and Selection Policy
- Sexual Harassment Policy
- Workplace Health and Safety Policy
- Information Technology Acceptable Use Policy
- Social Media Policy
- Whistleblower Policy