



DIVERSITY POLICY

Purpose

Jumbo Interactive Limited ('the Company') appreciates the value inherent in a diverse workforce. Diversity may result from a range of factors: origin, age, gender, race, cultural heritage, lifestyle, education, physical ability, appearance, language or other factors. We value the differences between people and the contribution these differences make to our business.

We will actively manage diversity, finding ways of utilising the differences that exist, in order to improve our business. This requires that we actively and flexibly seek to accommodate the unique needs of many different workplace participants.

Above all, we are committed to ensuring that all workplace participants are treated with respect and dignity.

Scope

This policy applies to all directors, employees, agents and contractors (including temporary contractors) of the Company, collectively referred to in this policy as 'workplace participants'.

Procedure

It is the responsibility of the Board to create an environment where:

1. There is tolerance of difference. The Company will ensure that all workplace participants are treated fairly and with respect and dignity.
2. The ability to contribute and access opportunities is based on merit. The Company will adopt and actively encourage those practices and procedures that enable workplace participants to contribute to the best of their ability.
3. Inappropriate attitudes or behaviours are confronted. The Company will treat seriously any instance of inappropriate behaviour and confront attitudes based on inappropriate stereotypes.

Equal Opportunity In Employment

Specifically, the Company will provide equal opportunity in respect to employment and employment conditions, including:

1. *Recruitment*

All recruitment and selection documentation, procedures and practices will be non-discriminatory. Documentation, including personnel specifications, job advertisements, application forms, contracts, etc will include no direct or inferred discrimination. Company procedures, including interviews, reference checking and testing will be undertaken in such a way so as to ensure the absence of discriminatory practice.

2. *Training*

All internal and external training opportunities will be based on merit and in the light of Company and individual needs.

3. *Career Advancement*

All decisions associated with career advancement, including promotions, transfers, and other assignments, will meet organisational needs and be determined on merit.

The Work Environment and Harassment

The Company will ensure that all workplace participants have access to an environment that is free from harassment. Harassment is demeaning and contrary to the spirit of this policy. This means that the Company will not permit unwanted conduct based on an employee's personal circumstances or characteristics. In particular the Company will not tolerate:

1. *Sexual harassment*

Sexual harassment is defined as unwanted conduct of a sexual nature, or other unwanted conduct based on sex affecting the dignity of women and men at work. Under law, sexual harassment is illegal.

2. *Racial harassment*

Racial harassment is any conduct based on racial differences affecting the dignity of men and women at work. Under law, racial harassment is illegal.

Departmental Managers and coordinators of staff, such as supervisors and team leaders, are required to ensure that the workplace is harassment free, and to ensure that complainants or witnesses are not victimized in any way. Any reports of sexual, racial or other harassment will be treated seriously, confidentially, and sympathetically by the Company.

Responsibility

In order for this policy to operate, it is essential that every workplace participant is responsible for the elimination of discriminatory practices, and for the creation of a diverse and tolerant workplace.

In particular, Departmental Managers have responsibility for the maintenance and promotion of an equal opportunity workplace.

Disciplinary Action

Disciplinary action, which may include dismissal, will be taken against anyone found to be guilty of a breach of this policy.

Support

The Company is committed to supporting workplace participants in the achievement of a diverse workplace. Departmental Managers are responsible for developing and encouraging a positive environment, where all workplace participants are treated with respect and dignity. Departmental Managers must take responsibility for reporting breaches of this policy, and should themselves act in accordance with its spirit.

Monitor Company Performance

The Company will proactively monitor Company performance in meeting this policy and the standards embodied in it by:

- The Board establishing, and reviewing on an annual basis, measurable objectives for achieving improvement in the diversity mix of the workforce and particularly gender diversity;
- Recruiting and managing on the basis of an individual's competence and performance;
- Creating a culture that empowers and rewards people to act in accordance with this policy;
- Appreciating and respecting the unique attributes that each individual brings to the workplace;
- Fostering an inclusive and supportive culture to enable people to develop to their full potential;
- Ensuring the Company has clear reporting processes in place;
- Promoting diversity through personal actions and interactions;
- Taking action to prevent and stop discrimination, bullying and harassment; and
- Actively monitoring recruitment and promotions.

Gender Diversity

The Board has developed the following objectives regarding gender diversity and aims to achieve these objectives over the next five years as director and senior positions become vacant and appropriately qualified candidates become available:

	2018		2022
	No.	%	
Women on the Board	-	-	To have at least one woman on the Board
Women in senior executive positions	1	20	Maintain the current number (one) of women
Women employees in the Company	43	37	Maintain the percentage of women in excess of 45%
Total employees in the Company	<u>115</u>	<u>100</u>	

Variations

The Company reserves the right to vary, replace or terminate this policy from time to time.
