



BLACK PEARL GROUP LIMITED

DIVERSITY POLICY

Policy Statement

Black Pearl Group Limited (**BPG**) believes that building diversity and inclusion as well as proactively recognising equality in BPG will deliver enhanced business performance. BPG strives to celebrate diversity in its workforce to create an inclusive workplace culture which leverages its peoples' unique backgrounds, qualities and contributions to deliver value to BPG's shareholders (**Shareholders**).

BPG is committed to pay parity as well as attracting, recruiting, developing, promoting and retaining a diverse group of individuals, who will help drive BPG's business performance. Diversity involves people at all levels within BPG possessing a diverse blend of skills, experiences, perspectives, styles and attributes gained from life's experiences and backgrounds, including on account of their culture, gender, age, religion, sexual orientation or otherwise.

Application

This policy applies to BPG's board of directors (**Board**) and should be read in conjunction with the Code of Ethics and any other policies covering areas such as values, culture and employee expectations, which are consistent with the principles of this policy.

Policy Objectives

BPG is committed to:

- adding to and developing the collective relevant skills, and diverse experience and attributes of BPG's people;
- ensuring that BPG's culture and management systems are aligned with, and promote, the attainment of diversity and inclusion;
- providing an environment where discrimination is not acceptable and in which all people are treated with fairness and respect, and have equal opportunities available at work; and
- being recognised as being an organisation that exemplifies diversity and inclusion in action.

BPG will have measurable objectives in relation to diversity and the Board will annually assess and review both the objectives and the progress in achieving them. BPG intends to achieve the objectives of this policy through an assessment of BPG's:

- corporate retentions rates;
- equal pay;
- flexible working arrangements;
- organisational engagement regarding diversity; and

- targets for diverse board appointments.

BPG may carry out anonymous surveys of its employees in order to obtain qualitative data about diversity and inclusion in the workplace.

Where appropriate, the Board may delegate the task of setting measurable objectives for diversity to BPG's Remuneration Committee in the manner described in the Remuneration Committee Charter.

BPG will provide in its annual report:

- a quantitative breakdown, as to the gender composition of BPG's directors and officers, including comparative figures for the prior year; and
- a statement from the Board providing its evaluation of BPG's performance with respect to this diversity policy.

General

Training may be required for the Board about recruitment and the factors that should be taken into account in the selection process, with an emphasis on assessing merit and avoiding discrimination. Where this training is required it will be provided.

While BPG is committed to fostering diversity and inclusion, BPG will always seek to employ or promote the right person for the role.

Nothing in this policy will be taken or construed to endorse:

- the principal criteria for selection and promotion of BPG's people as being anything other than their overall relative prospect of adding value to BPG and enhancing the probability of achievement of BPG's objectives;
- any discriminatory behaviour by or within BPG contrary to the law; and
- any existing BPG person being in any way threatened or prejudiced by this policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, in common with others.

Review and Communication of Policy

This policy will be updated as required.

BPG will communicate this policy to Shareholders and to the market, including via its website, in the interests of transparency and accountability, and to better promote achievement of the objectives of this policy.

This policy has been agreed by the Board of Black Pearl Group Limited.

Issue	Approved by	Date
1.0	The Board	24 November 2022