

## PURPOSE

At Wesfarmers we are committed to diversity and inclusion because we believe this is essential to achieving our objective of providing satisfactory returns to shareholders.

Through diverse and inclusive teams, we gain access to the best available talent, harness creativity and problem solving and gain insight into our diverse customer base and other stakeholders. This enhances our performance and enables future growth.

Diversity can be visible or invisible and includes difference of gender, ethnicity, indigeneity, thought, experience, religious beliefs, education, age, ability, family responsibilities, sexual orientation and gender identity.

Wesfarmers strives to provide an inclusive workplace where everyone feels respected and safe. This means providing and promoting an environment where everyone has equal access to employment and its benefits based on the merit principle; and that does not condone or tolerate inappropriate workplace and business behaviour (including discrimination, harassment, bullying, victimisation and vilification).

This commitment to diversity and inclusion aligns with the Wesfarmers values of integrity, openness, accountability and entrepreneurial spirit.

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## POLICY APPLICATION

The principles of this policy must be complied with by all Wesfarmers team members in the Wesfarmers Group and by each of its divisions and wholly owned businesses.

This policy should be read in conjunction with the [Wesfarmers Code of Conduct](#) and the Wesfarmers Reconciliation Action Plan.

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## POLICY

At Wesfarmers, everyone has a part to play in actively and intentionally behaving with inclusion in mind.

Across the Wesfarmers workforce, management and the Board:

- (a) We value the diversity of our team members and a culture of inclusion at all levels and in all parts of our Group because it ensures all team members feel respected and safe and enables us to achieve our objective.
- (b) We empower team members to manage their productivity, effectiveness and personal situation. We will consider all requests for flexible ways of working.
- (c) The Wesfarmers Board has overall responsibility for:
  - (i) approving this policy and monitoring its effectiveness;
  - (ii) delegating responsibility to divisions for implementing inclusion initiatives and monitoring the effectiveness of that implementation;
  - (iii) setting measurable objectives for achieving gender diversity in the composition of the board, among senior executives and within the workforce generally and reporting on progress towards achieving those objectives. From time to time we may consider making changes to those objectives; and
  - (iv) overseeing reporting on Wesfarmers Group inclusion initiatives, including in relation to each reporting period, the disclosure of the measurable objectives set for that period and Wesfarmers' progress in achieving those objectives.
- (d) The Corporate Office and each division have delegated responsibility for:
  - (i) establishing and communicating inclusive policies, procedures and programs that:
    - comply with relevant legislation (including equal opportunity, human rights and anti-discrimination statutes);
    - reflect the merit principle which requires an objective assessment of a person's abilities, qualifications, experience, performance and personal qualities in relation to all appointments, promotions and training opportunities;

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- prohibit discrimination on the grounds of any facet of diversity, including direct discrimination (less favourable treatment than would have been received by any other person or group of people in similar circumstances) or indirect discrimination (which requires a person to comply with a requirement or condition with which they cannot comply but which would not reasonably prevent them from performing the role);
  - prohibit harassment, including:
    - sexual harassment, which occurs when a person is subject to an unwelcome sexual advance, request for sexual favours or any other unwelcome conduct of a sexual nature, whether physical or verbal, where that behaviour is intended to offend, humiliate or intimidate or has the effect of offending, humiliating or intimidating another person;
    - racial harassment, where someone or a group of people are subjected to conduct or behaviour on the grounds of their race, colour, national or ethnic origin which offends, insults, humiliates or intimidates them; and
    - harassment through electronic media;
  - take all reasonable steps to prevent harassment and discrimination from occurring; and
  - require discrimination and harassment complaints to be investigated and resolved in accordance with legislative requirements, taking into account the wishes of the complainant, legal obligations and the broader duty of care owed to all team members and other individuals in the workplace to feel and be safe.
- (ii) identifying priority areas that each division/business regards as most important in driving diversity and inclusion (including gender balance); taking action to make real progress and to achieve the Group's measurable objectives;
- (iii) communicating, driving and monitoring progress towards identified priority areas within the division/business and providing an annual divisional board paper on progress towards inclusion and diversity priorities; and
- (iv) providing timely and transparent reporting to the Wesfarmers Board and all our stakeholders on:
- gender and Aboriginal and Torres Strait Islander representation across the total workforce;
  - breaches of relevant codes of conduct;
  - an annual review of pay equity; and
  - an annual report lodged with the Workplace Gender Equality Agency in accordance with the obligations under workplace gender equality laws.

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**POLICY  
AMENDMENT**

This policy cannot be amended without approval from the Wesfarmers Board.

The Board will from time to time review this Policy to ensure that it meets the needs of the Wesfarmers Group, best practice standards and complies with the ASX Corporate Governance Principles and Recommendations.

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**DATED**

March 2021

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