



Policy

Diversity and Inclusion

People & Culture

Approver's name and title:

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Head of People & Culture

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Classification

Diversity Statement

Keyton recognises the benefits that diversity brings to our business and the importance of Respecting Everyone's Journey. Therefore, our policies are inclusive and apply to all employees, regardless of age, gender, ethnicity, physical or mental ability, religion, sexuality, nationality, education, family responsibilities, and military or veteran status.

Purpose

Keyton is an equal-opportunity employer and is committed to creating an inclusive workplace. As such, we believe in equal employment opportunities to employees and applicants and prohibit discrimination on the basis of race, colour, religion, sex, sexuality, gender identity and expression, intersex status, national origin, age, disability, genetic information, health status, creed, citizenship status, relationship and/or marital status, pregnancy, family responsibilities, medical history, military or veteran status, political affiliation, union membership and/or any other categories protected by applicable federal, state or local law. It is the responsibility of every employee to follow this policy.



In implementing this policy, Keyton is committed to:

- Fully utilising and developing the potential of all employees; and
- Creating an awareness of the right to a workplace free from discrimination.

Policy

Reasons for Diversity and Inclusion

To Lead with Heart, we need a culture and an environment that embraces and respects difference. One where people can bring their 'whole self' to work and feel safe, empowered, and motivated to be the best they can be. Diversity and Inclusion is a key enabler to realising this vision.

Specifically, as we:

- **Make room for kindness** – We are committed to making our workplaces as respectful as possible towards employees, contractors, suppliers and residents – and anyone else who comes into contact with us.
- **Respect everyone's journey** – This means we are an equal-opportunity employer. That is, we respect the rights and dignity of all employees. We aim to cultivate a diverse and inclusive culture. A culture that values and celebrates the rich mix of individuals, viewpoints, talents and experiences that make Keyton the organisation it is. We believe in equal employment opportunities for all employees and applicants. This applies to all phases of employment including: recruitment, placement, promotion, transfer, upskilling, compensation, and benefits.
- **Realise the opportunities** – to remain competitive and to differentiate in the market, innovation is critical. We know that our people will be more innovative, productive, and engaged when they can bring their 'whole self' to work.
- **Connect as one team** - that extends to our relationships with residents and other stakeholders. With integrity, mutual respect, and trust at heart, we can work together to make a more positive impact in more ways.
- **Find the fun** – by creating a team environment where everyone can bring their best self to work!

Diversity and Inclusion Goals of Keyton

Five key goals underpin Keyton's approach to managing Diversity and Inclusion, and they are as follows:

1. Create a workplace where people feel comfortable being their true selves.
2. Include and embed diversity and inclusion principles in the Keyton **culture** so that they are followed in the Keyton community.
3. Provide **career development** opportunities for all key talent in a fair and equitable way.
4. Continually **educate** all employees about the importance of a diverse and inclusive workplace to business success.
5. Ensure **fairness and parity** in creating and maintaining a diverse and inclusive workplace.



Measuring Diversity and Inclusion

Keyton is committed to establishing and maintaining a Diverse and Inclusive workplace. Employees may self-identify in our internal systems by updating their Diversity Information in the Forms section of Keyforce. This self-identification supports our business in assessing Keyton's performance in terms of achieving its diversity goals. These include:

- Employee perceptions which are measured quantitatively and qualitatively. Periodic employee engagement surveys will assess sentiment on a quantitative basis. These will identify issues, collect ideas, test solutions and track and measure sentiment regarding a range of diversity topics including cultural diversity, workplace flexibility and gender equity. All results drive diversity priorities.
- Employee data such as workforce diversity by itself as well as across employee learning and development, succession planning and recruitment, are tracked and used to further refine diversity and inclusion strategies, initiatives, and processes. For example, in relation to gender equity, key data is tracked including gender splits by role, level, retention development programs and the recruitment process.

Discrimination

Keyton is committed to fostering an inclusive and respectful workplace environment in accordance with Australian anti-discrimination laws. These laws prohibit discrimination based on several protected attributes, including age, disability, race, sex, intersex status, gender identity, and sexual orientation. Employees are encouraged to familiarise themselves with both federal and state/territory laws. Specifically, the relevant federal legislation includes:

- **Age Discrimination Act 2004:** This act ensures that age-related discrimination is unlawful in areas such as employment and education.
- **Australian Human Rights Commission Act 1986:** Safeguards human rights in Australia, including investigating and conciliating complaints about discrimination and human rights breaches.
- **Disability Discrimination Act 1992:** It prohibits discrimination against individuals with disabilities and promotes accessibility and equal opportunities.
- **Racial Discrimination Act 1975:** This act addresses racial discrimination and promotes cultural diversity and harmony.
- **Sex Discrimination Act 1984:** It prohibits discrimination based on sex, gender identity, and sexual orientation.

Each Australian state and territory also has its own anti-discrimination legislation which may contain unique protections. An overview of applicable state-based legislation can be found at the end of this document (along with links to the above legislation).

Discrimination by any person against another on an unacceptable ground will not be tolerated by Keyton. This includes both direct and indirect discrimination. Direct discrimination occurs when someone is treated unfavorably due to their protected attributes (e.g., refusing to hire women because of potential parental leave). Indirect discrimination arises when policies or practices disproportionately disadvantage certain groups (e.g., height requirements indirectly affecting women and specific races).



We uphold a fair and inclusive workplace for all, irrespective of:

- Sex
- Gender history, gender identity, transgender, transsexual and intersex status
- Physical or mental disability, illness or injury
- Family responsibility
- Relationship and /or marital status
- Religion
- Political beliefs
- Race
- Age
- Physical features
- Genetic information
- Industrial activity, Trade Union membership or non-membership
- Sexuality and lawful sexual activity
- Pregnancy or intended pregnancy
- Breastfeeding
- Creed
- Citizenship status
- National Origin
- Colour
- Personal association (whether as a relative or otherwise) with a person who is identified by reference to any of the above attributes.

Examples of discriminatory behaviour may involve:

- Offensive comments on another person's racial or ethnic background, sex, physical appearance, disability, dress, private life or religion, and the like;
- Display of pictures, calendars, pin-ups, posters, computer images (e.g. in electronic mail messages) etc. which are offensive or derogatory;
- Expressing negative stereotypes of particular groups;
- Judging a person on characteristics such as religious or political beliefs, cultural practices, sex, or age rather than work performance;
- Using stereotypes or assumptions when making decisions about a person's career.

As part of our Employee Code Of Conduct, employees are expected to behave and make decisions free from discrimination. Guidance on these expectations can be found in the Code of Conduct and Employee Conduct Guide, linked at the end of this document.

If you believe you are experiencing adverse action due to discrimination, including instances of sexual harassment, bullying and generalized harassment, procedures on how to report these incidences can be found in our Bullying and Harassment policy, linked at the end of this document.



Exceptions

In some situations, legislation may provide exceptions to discrimination or permit what would otherwise be unlawful discrimination. In these circumstances discrimination will be permissible. For example, while it is unacceptable to discriminate against a person with a disability, what would otherwise be unlawful discrimination may be justified if the person cannot perform the inherent requirements of their position. However, we will make reasonable adjustments for qualified individuals with known disabilities unless doing so would result in undue hardship for Keyton.

Great care should be taken to ensure that any reliance on an exception is proper and, where appropriate, supported by legal advice.

Consequences of breaching this policy

Disciplinary action may be taken at Keyton's sole discretion if this policy is breached. This may include action up to and including dismissal in appropriate circumstances.

Definitions

Term	Definition
Discrimination	Being treated badly or unfairly because of a personal characteristic
Diversity	Relates to the variety of age, gender, ethnicity, physical or mental ability, religion, sexuality, nationality, education, family responsibilities, and military or veteran status of our people.
Equity	Relates to treatment with fairness and justice.
Inclusion	Is to embrace all people irrespective of their individual diverse



Further information and related materials

Related information	Description
Anti-Discrimination Information	Fair Work information on government Protections from discrimination at work.
Workplace Discrimination Fact Sheet	Fair Work Workplace Discrimination Fact Sheet.
Keyforce Form Entry QRG	A Quick Reference Guide on how to submit Forms in Keyforce
Employee Code of Conduct	Outlines the expected behaviors, responsibilities, and ethical standards for employees of Keyton– acting as individuals and as a team.
Employee Code of Conduct Guide	Outlines the expected behaviors, responsibilities, and ethical standards for employees of Keyton– acting as individuals and as a team.
Bullying & Harassment Policy	Keyton's commitment to providing a safe and respectful workplace by defining unacceptable behaviors and detailing procedures for reporting and addressing incidents.

Contact	Details
People Support	PeopleSupport@keyton.com.au



Scope

This policy applies to the following:

Relationship to Keyton	Employment contract	Time type	Payroll type
✓ Employees	✓ Permanent	✓ Full time	✓ Salaried
✓ Consultants	✓ Fixed Term	✓ Part time	✓ Wages
✓ Contractors	✓ Casual		

Keyton reserves the right to modify Policies, Procedures, Standards and Guidelines periodically in response to changing legal obligations, industry standards, or business needs. Such adjustments will be communicated transparently to all relevant stakeholders.