

# Group Inclusion and Diversity Policy

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## Purpose and scope

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This policy sets out our commitment to Inclusion and Diversity. A diverse workforce and inclusive culture help us to fulfil our purpose of improving the financial wellbeing of our customers and communities. It is also consistent with our corporate values of Care, Courage and Commitment.

Reflecting the diversity of our customers and communities enables us to better understand and serve their needs, build trust and make better business decisions. Fostering an inclusive workplace culture, where our people can safely share their perspectives, skills and experiences, enables us to attract, retain and engage our people, as well as innovate and effectively manage risk.

Failing to maintain an inclusive and diverse workplace may result in harm to individuals, adverse reputational impacts, regulatory action and liability for the Group.

This policy applies to the Group, Directors, Employees and Contractors.

Where local traditions or laws impact the safety or human rights of Employees with regards to their Diversity, it is expected that Employees will act in line with the Group's values, Code of Conduct and the Policy (provided always that in doing so, Employees are not to breach any local laws).

## Policy statement

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We are committed to investing in our people, systems, processes and policies to ensure our workplace is inclusive and diverse, and expect our people to work together to achieve a culture that supports this commitment.

## Policy requirements

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### Principles

- We recognise that, as individuals, our employees come together with their own frame of reference and perspectives shaped by their unique experiences.
- We will not tolerate any form of unlawful discrimination or harassment, bullying and victimisation of persons in the workplace.
- We aim to attract and retain a workforce whose composition reflects a diversity of backgrounds, knowledge, experience and perspectives.
- We aim to make fair and merit-based decisions, particularly with regards to recruitment, evaluation of performance, access to development opportunities, identification of talent, succession planning and career progression.
- We strive for pay equity and continuously monitor to identify, eliminate, and rectify gaps.
- We monitor and manage our systems, processes and practices to strengthen equality of opportunity for everyone.
- We encourage Employees to seek out, and learn from, the experiences of each other and customers, to build understanding, to aspire to fair and

inclusive decision-making and to strive to continuously improve and strengthen our practices.

- We seek transparency in reporting internally and externally against our objectives and in accordance with statutory and regulatory requirements. Internal reporting occurs formally on an annual basis to the ELT and CBA Board, and informally regularly throughout the year. External reporting includes, but is not limited to, reporting against the ASX Corporate Governance Council’s Principles and Recommendations, the Australian Banking Association Code of Practice, Workplace Gender Equality Act 2012 (Cth) and other diversity-related standards and anti-discrimination legislation in the locations where we operate.
- We believe that flexible working practices, when leveraged as a strategic tool to improve business outcomes and Employee wellbeing, is a foundation for delivering sustained high-performance and enhanced productivity.
- We recognise that the sharing of caring responsibilities promotes workforce participation. This includes an inclusive approach to parental leave, which is gender-neutral, and in accordance with legislation e.g. Paid Parental Leave Act 2010 (Cth).

We are committed to ensuring our supply chain reflects the communities in which we operate – as we recognise that a diverse supply chain will drive flexibility, responsiveness and innovation. We proactively seek to engage and support Indigenous, women-owned businesses, social enterprises and disability enterprises through our direct and indirect supply chain.

## Accountabilities

Role	Accountabilities
<b>CBA Board (Governance body)</b>	<ul style="list-style-type: none"> <li>• Setting certain Diversity targets and monitoring progress towards their achievement.</li> <li>• Holding the ELT to account for the delivery of the inclusion and diversity strategy and achievement of Diversity targets.</li> </ul>
<b>General Managers, Executive General Managers, Group Executives (Line 1)</b>	<ul style="list-style-type: none"> <li>• Creating and maintaining an inclusive workplace culture through role modelling inclusive behaviours, communicating their commitment, being consistent in their approach, and measuring their progress.</li> </ul>
<b>Employees and Contractors (Line 1)</b>	<ul style="list-style-type: none"> <li>• Contributing to, and maintaining, an inclusive workplace culture.</li> <li>• Respecting the Diversity of others and demonstrating Inclusion through the Group’s values and adherence to our Code of Conduct.</li> </ul>

## Compliance statement

This policy forms part of the Group’s decision-making and accountability framework and supports compliance with legislative requirements.

We report annually to the Workplace Gender Equality Agency, in compliance with the Workplace Gender Equality Act 2012 (Cth), as well as other reporting requirements based on local legislation.

## Breach of policy

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<b>Consequences</b>	Breach of this policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement).  This policy must be read together with the Group Inclusion and Diversity Procedure. Failure to follow the Group Inclusion and Diversity Procedure may amount to a breach of this policy.
<b>Escalation</b>	Potential or realised breaches of this policy must be escalated according to the Group Issues Management Procedure or Group Incident Management Procedure.

## Definitions

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	In this policy, defined terms are capitalised. Those terms have the meaning given to them below or, if not defined below, in the Group Policy Framework Glossary.
<b>Diversity</b>	A collection of individual attributes that includes, but is not limited to, demographic diversity, cognitive diversity, background and lived experience. Demographic diversity may be visible or invisible and may include (but not be limited to) gender, marital or family status, sexual orientation, gender identity, age, disability, ethnicity, caring or family responsibilities, religious beliefs, cast, cultural background, socio-economic background, perspective and experience.
<b>Inclusion</b>	The state where all Directors, Employees and Contractors have equal opportunity to fully contribute and participate in the workplace. This is achieved when individuals feel valued, respected, psychologically safe, and have a sense of belonging.
<b>Merit</b>	Merit is determined through unbiased judgement of a person's potential and performance based on their knowledge, skills, behaviours and experience as relevant to the requirements of a role. Factors that are not relevant to the requirements of the role are not taken into consideration.

## Policy governance

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<b>Policy Approver</b>	CBA Board
<b>Exemption Authority</b>	ELT NFR Policy Subcommittee
<b>Policy Owner</b>	EGM Organisational Development
<b>Policy Support</b>	Head of Inclusion & Diversity
<b>Review Cycle</b>	Biennial

## Relevant documents

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### Related internal documents

Group Inclusion and Diversity Procedure  
Code of Conduct  
Conduct Policy  
Flexible Working Arrangements Procedure  
Group Leave and Attendance Policy  
Group Parental Leave Procedure  
Group Recruitment, Selection and Appointment Policy  
Group Recruitment, Selection and Appointment Procedure

### External sources of obligations

Australia - Australian Human Rights Commission Act 1986; Age Discrimination Act 2004; Disability Discrimination Act 1992; Racial Discrimination Act 1975; Sex Discrimination Act 1984; Fair Work Act 2009; Workplace Gender Equality Act 2012 (Cth); State and Territory anti-discrimination legislation.

India - Constitution of India 1950 Article 14&15; Sexual Harassment of Women at Workplace Act 2013; Rights of Persons with Disability Act 2016.

New Zealand - Human Rights Act 1993.

United Kingdom – Equality Act 2010.

Other legislation, regulations and external requirements applicable to the Group which govern:

- workplace discrimination, diversity and inclusion;
- equal employment opportunity; and
- human rights.

## Material policy revisions

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Version	Approval Date	Effective Date	Details
1.0	10/10/2018	10/10/2018	New policy
1.1	06/08/2019	06/08/2019	Material changes
1.2	10/06/2020	18/12/2020	Material changes to supply chain principle
1.3	07/12/2020	18/12/2020	Minor changes to policy title, Values alignment, and related documents.