Diversity Policy

Vitura Health Limited

ABN 59 629 071 594

(Company)

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1. Scope of policy

Vitura Health Limited is committed to promoting diversity within the Company and recognises the value of diversity in achieving the Company's corporate objectives and maximising value to shareholders. To this end, the Company aims to promote and implement diversity strategies:

(a) in its employment practices, to provide diversity in employees' experiences, perspectives, professional skills, gender, age, sexual orientation, ethnicity and cultural background; and

(b) across all components of the Company's business practices, including through its education programs, selection programs for consultants, mentoring programs and community and corporate social responsibility initiatives.

The Company considers that diversity within the Company will improve the quality of decision-making, productivity and teamwork amongst its employees. This policy applies to the Company's Board of Directors (**Board**), senior management, employees and contractors.

Valuing and managing diversity means that the Company will:

(a) facilitate equal employment opportunities based on relative ability, performance or potential;

(b) create an inclusive workplace culture;

(c) build a safe work environment by taking action against inappropriate workplace and business behaviour including discrimination, harassment, bullying, victimisation and vilification; and

(d) develop flexible work practices to meet the diverse needs of its employees.

2. Diversity framework

The Company aspires to achieve the objectives set out in this policy and aims to embed a strong diversity framework within its systems and culture so that its ability to benefit from the value of diversity is maximised as the Company continues to expand.

2.1 BOARD RESPONSIBILITIES

The Board is responsible for designing and overseeing the implementation of this diversity policy.

The Directors of the Company will be responsible for promoting diversity within the Company's culture and monitoring the effectiveness of the Company's diversity policy. The Company recognises that it needs to provide management with appropriate guidance in order to foster a value for diversity within its management culture. To achieve this, the Company is committed to providing its management with the appropriate training and resources to understand the benefits of diversity in recruitment strategies and day-to-day management strategies. The Board will also be required to develop initiatives that will promote and achieve diversity goals.

The Board is responsible for reviewing this diversity policy and will assess the status of diversity within the Company and the effectiveness of this policy in achieving the measurable objectives which have been set to achieve diversity.

2. Diversity framework CONTINUED

2.2 EMPLOYEES

All employees are required to act in a manner that supports diversity within the workplace and promotes the objectives set out in this diversity policy. Employees are encouraged to provide feedback to management regarding programs or initiatives which will improve this diversity policy.

2.3 GENDER DIVERSITY

The Company recognises that gender diversity amongst its Board and employees:

(a) broadens the pool of high-quality directors and employees;

(b) is likely to support employee retention;

(c) is likely to encourage greater innovation by drawing on different perspectives;

(d) is a socially and economically responsible governance practice; and

(e) will improve the Company's corporate reputation.

The Board will adopt measureable objectives to assist the Company to achieve gender diversity and review the Company's progress in meeting these objectives and the effectiveness of these objectives each year. The Nomination and Remuneration Committee may recommend such measureable objectives to the Board in light of the Company's general selection policy for directors, officers and employees.

The Nomination and Remuneration Committee will report to the Board on the effectiveness of the Company's diversity objectives each year. This report will include a review of the relative proportions of men and women at all levels in the organisation.

2.4 NON-INCLUSIVE OR DISCRIMINATIVE BEHAVIOUR

The Company does not tolerate behaviours that undermine a diverse and inclusive workplace, including but not limited to behaviours such as discrimination on any grounds (including gender, religion, age, ethnicity etc.), harassment, bullying, victimisation and vilification. Each of these terms is explained in further detail below:

(a) Direct discrimination is denying a person of an opportunity or treating them less favourably because they belong to a particular group or category.

For example: not employing a female applicant on the grounds of males typically doing the job.

(b) Indirect discrimination occurs when an action or policy which appears to treat everyone equally, has a discriminatory effect against a certain group of people.

For example: holding workplace meetings after work hours when employees with family responsibilities would find it difficult to attend.

(c) Harassment is any form of behaviour that is unwelcome and which offends, humiliates or intimidates a person.

(d) Sexual Harassment is any form of unwelcome sexual attention. This may be obvious or indirect, physical or verbal, intentional or unintentional, or behaviour that creates a sexually hostile or intimidating environment.

2. Diversity framework CONTINUED

(e) Bullying is the repeated less favourable treatment of a person by another or others that may be considered unreasonable and inappropriate workplace behaviour. The behaviours can be physical, verbal or non-verbal.

For example: assaulting, shouting at or isolating a person in the workplace.

(f) Victimisation is when an employee is treated less favourably for making a complaint or providing information as a witness.

For example: using pay back, refusing to acknowledge the person, removing or reducing benefits of employment.

(g) Vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule of another person or group of persons on the grounds of race, ethno-religious beliefs, HIV or AIDS, transgender or homosexuality.

For example: graffiti that encourages hatred of a particular race of people.

The Company encourages all employees to speak up about unacceptable behaviour in the workplace and commits to take firm and immediate action against any such behaviour.