

EQUALITY AND DIVERSITY IN THE WORKPLACE POLICY

TMC-0000-HR-0001



Background

Broadspectrum Pty Ltd (**Broadspectrum** or the **Company**) is a wholly-owned subsidiary of Ferrovial S.A. (**Ferrovial**). As an international organisation, Broadspectrum's workforce and client base represent a spectrum of individual attributes including (but not limited to) cultural and ethnic backgrounds, gender, age, family and carer's responsibilities. Consistent with Ferrovial's principles of conduct and behaviour, Broadspectrum recognises the benefits of such diversity and is dedicated to sustaining a work environment that respects individual differences and promotes equality and diversity at all levels of the organisation. Accordingly, the Broadspectrum board of directors (the **Board**) and senior management have endorsed this *Equality and Diversity in the Workplace Policy* to support the Company's commitment to equality and diversity.

Broadspectrum's commitment is also reflected in the *Code of Business Conduct* and applicable local policies and procedures.

Purpose of this policy

The purpose of this Policy is to:

- ▶ promote a fair and inclusive workplace culture free from discrimination and harassment by setting out relevant obligations of Broadspectrum directors, officers, employees, consultants, contractors and any other parties acting as representatives or agents of Broadspectrum (**Employees** for the purposes of this Policy)
- ▶ set out Broadspectrum's objectives relating to diversity including but not limited to gender diversity, and
- ▶ provide the standard and guide development of workplace policies and procedures at local levels of the Company.

Scope

This Policy applies to all Broadspectrum:

- ▶ Employees
- ▶ where applicable, Business Partners, and
- ▶ wholly and majority-owned business ventures in all countries in which Broadspectrum conducts business. Where Broadspectrum has a minority interest, it will seek to ensure that the legislative requirements and the intention underlying this Policy are complied with, but recognises that the manner in which these requirements are met may vary. References in this Policy to Broadspectrum includes its related entities.

Training and Communication

Broadspectrum regularly communicates this Policy to Employees through our established communication channels. Employees also receive regular training, in respect of this policy and associated local policies and procedures, in the scope of their employment with Broadspectrum.

Sources of legal obligations

The legal obligations underlying this Policy include the applicable laws regarding workplace equal opportunity, discrimination and harassment that apply in the jurisdictions in which Broadspectrum conducts business.

To the extent that the applicable laws of a country in which Broadspectrum conducts business conflict with or impose a higher standard than this Policy, the applicable laws must be complied with.

Definitions

Diversity is the range of individual attributes such as cultural and ethnic backgrounds, gender, age, family, and carer's responsibilities present among Broadspectrum Employees. Other individual attributes include race, colour, national extraction, marital status, pregnancy, sexual orientation, gender identity, intersex status, disability and impairment, religion, political preference, and trade unionism.

Equality is the principle of affording Employees fair and equal opportunities in recruitment and selection, remuneration, career development and training, transfers, promotions and succession planning, and termination of employment, without regard to such individual attributes.

Business Partners includes: clients, suppliers, consultants, contractors, sub-contractors, joint-venture and alliance partners, and other representatives and third-parties performing services for, or on behalf of, Broadspectrum.

Benefits of diversity and equality

Broadspectrum recognises that diversity as well as respect and appreciation of all Employees are integral to creating a collaborative workplace culture, competitive advantage in a global environment and, ultimately, sustainable business success.

The perspectives and experience present in a diverse and inclusive workforce enhance the quality and depth of decision-making, and improve collaboration and teamwork at all levels of the organisation. Such a workforce is well equipped to provide creative and innovative solutions aligned to the needs of our increasingly diverse and multicultural client base, and to respect, and meaningfully contribute to, the communities in which Broadspectrum operates. The Company believes that an inclusive and fair work environment, free of discrimination and harassment, has a positive impact on the wellbeing of Employees, job satisfaction, productivity and retention within the organisation.



Equal access to employment opportunities

It is Broadspectrum's policy to comply with all laws governing equal employment opportunity applicable in the jurisdictions in which the Company operates.

It is also Broadspectrum's policy to make decisions regarding recruitment and selection, remuneration, career development and training, transfers, promotion and succession planning based solely on merit – being the skills, experience, qualifications and potential of the individual connected to the job - without regard to cultural and ethnic backgrounds, , age, sexual orientation, family and carer's responsibilities, race, colour, national extraction, marital status, pregnancy and gender identity, intersex status, disability and impairment, religion, political preference, and trade unionism or any other classification protected by applicable law, provided that the inherent requirements of the position are able to be fulfilled.

Management, Human Resources personnel and all other Employees, are required to:

- ▶ act in a balanced, non-discriminatory manner when making employment-related decisions in relation to other Employees
- ▶ be aware of, and manage for, unconscious biases and work practices which may lead to exclusion of various groups or unintended discriminatory consequences, and
- ▶ adhere to applicable local policies and procedures.

Initiatives to support diversity

Broadspectrum encourages employment and promotion of individuals from groups that are underrepresented in the Company's workforce, aiming at all times to make employment-related decisions based on merit. Management will, from time to time, implement various initiatives to increase representation of various groups in the workforce.

Gender diversity objectives

As part of Broadspectrum's commitment to equality and diversity, the Board has set initial measurable objectives in relation to gender diversity, aiming to increase the level of participation of women throughout the organisation, with particular regard to professional roles in the three layers of the Company below the role of the Managing Director and Chief Executive Officer.

Discrimination and Harassment It is Broadspectrum's policy to keep the workplace free of inappropriate conduct that detracts from principles of diversity and equality, including discrimination (including indirect discrimination) and harassment (including bullying, victimisation and vilification). Sexual harassment is unlawful and Broadspectrum does not tolerate sexual harassment in any form in any place where its Employees are engaged. It is also Broadspectrum's policy to comply with all laws addressing discrimination and harassment in the workforce applicable in the jurisdictions in which the Company conducts business.

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Guided by the *Code of Business Conduct* and applicable local policies and procedures, Employees are not to engage in any form of discrimination and/or harassment towards other Employees, clients and business partners, at work and work-related functions.

While working in foreign geographic regions, Employees are expected to familiarise themselves with local culture, etiquette, protocol and communication techniques to ensure that their conduct, as a representative of Broadspectrum, is appropriate and culturally sensitive.

Consequences for Breach of the Policy

Breach of the discrimination and harassment provisions of this Policy by Employees:

- ▶ could expose the Company and individuals to civil liability (a financial penalty and liability for damages)
- ▶ could expose the Company to significant reputation damage, and
- ▶ will be regarded by Broadspectrum as serious misconduct which may lead to disciplinary action, including termination of employment or contract.

Review of this Policy

The Chief Executive, Human Resources is responsible for keeping this Policy up to date. A formal review takes place every two years, and the Board is responsible for approving this policy.

Related Documents

This Policy should be read in conjunction with Broadspectrum's other policies, including:

- ▶ *Code of Business Conduct*
- ▶ *Board Nominations Committee Charter*
- ▶ *Business Partners Policy*
- ▶ *Whistleblower Policy*
- ▶ *Indigenous Relations Policy*
- ▶ *Reconciliation Action Plan*
- ▶ *Equality and Diversity in the Workplace Handbook (Australia)*, and
- ▶ any relevant regional procedures.