

EMPIRE RESOURCES LTD

Diversity Policy

1. Introduction

Empire recognises the benefits arising from employee and Board diversity, including a broader pool of high quality employees, improving employee retention, accessing different perspectives and ideas and benefiting from all available talent.

Diversity includes, but is not limited to, gender, age, ethnicity and cultural background.

The Board also acknowledges the benefits of the recommendations and guidance provided in the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations* that relate to diversity, however, it is also cognisant of the fact that Empire's workforce is not of a size where the benefits of such initiatives are proportionate to the costs involved in the implementation of such strategies.

To this end, the Board has adopted a tiered approach to the implementation of its Diversity Policy which is relative to the size of Empire and its workforce.

Where Empire employs 50 or more employees, the Board undertakes to adopt practices in line with the recommendations and guidance provided in the ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations*.

Whilst Empire's workforce remains below this threshold, the Board will continue to drive Empire's diversity strategies on an informal basis and will apply the initiatives contained in this Diversity Policy to the extent that the Board considers relevant and necessary.

The Diversity Policy does not form part of an employee's contract of employment with Empire or any of its subsidiaries, nor does it give rise to contractual obligations. However, to the extent that the Diversity Policy requires an employee to do or refrain from doing something and at all times subject to legal obligations, the Diversity Policy forms a direction of the Company with which an employee is expected to comply.

2. Objectives

The Diversity Policy provides a framework for Empire to achieve:

- a) a diverse and skilled workforce, leading to continuous improvement in the business of the Company and the achievement of corporate goals;
- b) a workplace culture characterised by inclusive practices and behaviours for the benefit of all staff;
- c) improved employment and career development opportunities for women;

- d) a work environment that values and utilises the contributions of employees with diverse backgrounds, experiences and perspectives through improved awareness of the benefits of workforce diversity and successful management of diversity; and
 - e) awareness in all staff of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity,
- (collectively, the Objectives).

The Diversity Policy does not impose on Empire, its directors, officers, agents or employee any obligation to engage in, or justification for engaging in, any conduct which is illegal or contrary to any anti-discrimination or equal employment opportunity legislation or laws in any State or Territory of Australia or of any foreign jurisdiction.

3. Responsibilities

i. The Board's commitment

The Board is committed to workplace diversity and supports representation of women at the senior level of Empire and on the Board where appropriate.

The Board acknowledges its responsibility for the development of measurable objectives and strategies to meet the objectives of the Diversity Policy (Measurable Objectives) and the importance of monitoring the progress of the Measurable Objectives through the monitoring, evaluation and reporting mechanisms listed below.

Where Empire employs 50 or more employees, the Board shall;

- define its Measurable Objectives;
- undertake an annual assessment of those Measurable Objectives; and
- report on Empire's progress (if any) towards achieving them.

Where Empire employs less than 50 employees, the Board will monitor Empire's diversity strategies on an informal basis.

In any event, the Board will endeavour to conduct all Board appointment processes in a manner that promotes gender diversity, including establishing a structured approach for identifying a pool of candidates, using external experts where necessary.

ii. Strategies

Empire's diversity strategies may include:

- recruiting from a diverse pool of candidates for all positions, including senior management and the Board;
- reviewing succession plans to ensure an appropriate focus on diversity;
- identifying specific factors to take into account during recruitment and selection processes to encourage diversity;

- developing programs to develop a broader pool of skilled and experienced senior management and Board candidates, including, workplace development programs, mentoring programs and targeted training and development;
- developing a culture which takes into account domestic responsibilities of employees; and
- any other strategies the Board develops from time to time.

iii. **Monitoring and evaluation**

The Board is responsible for monitoring the scope and currency of this policy.

Empire is responsible for implementing, monitoring and reporting on the Measurable Objectives.

If and when Empire’s workforce grows to a size of 50 or more employees, it will undertake a review of the annual key performance indicators for the Managing Director and senior executives and will determine the extent to which the Measurable Objectives shall be linked to performance-based incentives offered to those executives.

Where appropriate, the Board will review progress against the Measurable Objectives (if any) as a key performance indicator in its annual performance assessment.

4. **Disclosure**

Where Empire employs 50 or more employees, it will disclose, for each financial year:

- a) any Measurable Objectives set by the Board;
- b) progress against these Measurable Objectives; and
- c) either:
 - i. the respective proportions of men and women on the Board, in senior executive positions (including how Empire has defined “senior executive” for these purposes) and across the Company; or
 - ii. if Empire becomes a “relevant employer” under the *Workplace Gender Equality Act*, it will disclose its most recent “Gender Equality Indicators”, as defined in the *Workplace Gender Equality Act*.

Where Empire employs less than 50 employees, it will comply with c) above, and will disclose information under sections a) and b) to the extent that they are relevant.