



DIVERSITY, EQUITY & INCLUSION POLICY

Last reviewed July 2023

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1. Purpose

- 1.1 Sanford Limited (Sanford) is committed to celebrating diversity and creating an inclusive and equitable workplace culture for our team whilst continuing to deliver value to our stakeholders and customers.
- 1.2 Sanford is committed to promoting equal employment opportunities for its employees and attracting, developing and retaining a diverse, talented group of individuals whose collective thoughts and contributions will help Sanford achieve its vision.
- 1.3 The purpose of this Policy is to confirm Sanford and its Board's commitment and core responsibilities in relation to diversity, equity and inclusion.
- 1.4 This Policy applies to all employees, and other representatives of Sanford (including Directors), referred to as "people".

2. Definitions

- 2.1 In line with Diversity Works New Zealand, the national body for workplace diversity, equity and inclusion, Sanford refers to the following definitions:
 - **Diversity** - Refers to the differences between people, their characteristics, attributes and backgrounds, and the perspectives they bring.
 - **Equity**: Refers to fair outcomes for individuals belonging to diverse groups, achieved by addressing the barriers each of these groups face.
 - **Inclusion**: Refers to the ongoing exercise of valuing diverse groups by creating safe, welcoming and collaborative environments in which everyone can fully participate and thrive.
 - **Unlawful Discrimination**: As prohibited under the Human Rights Act 1993 (HRA 1993) and the Employment Relations Act 2000 (ERA 2000), Unlawful Discrimination is any practice which makes distinctions between individuals or groups to disadvantage some and advantage others, based on one or more of the following attributes:
 - Age, gender, marital status, religion, ethical beliefs, ethnic origin, race, colour, employment status, sexual orientation, family status, disability (including physical or mental illness), political opinion and involvement or non-involvement in the activities of a union

3. Policy Statements

3.1 Sanford is committed to a culture that actively promotes and values diversity, equity and inclusion. We believe that diversity and inclusion of thought enables Sanford to better respond to the ever-changing environment we operate in and better serve the diverse customer and stakeholder base we are accountable to. This commitment is demonstrated in our open and fair people processes and equal opportunities afforded to all our people.

3.2 At Sanford we respect and value the contribution each person brings, and we believe diversity and inclusion of background, experiences, thoughts and ways of working lead to greater creative and innovative solutions which ultimately lead to a superior outcome for our stakeholders and customers socially, economically and environmentally.

3.3 The diversity dimensions in Sanford include (but are not limited to) the following:

- Gender
- Race, ethnicity and cultural background
- Disability and physical capability
- Skill set, ability and working experience
- Age
- Sexual orientation
- Religious or political belief
- Parental status
- Education level

3.4 Sanford has zero tolerance for any form of Unlawful Discrimination, whether it be active or passive discrimination of employees, potential employees and people we work with.

3.5 Harassment of any nature, bullying, victimisation, vilification, or any other offensive behaviour likely to humiliate, offend, intimidate or insult others will not be tolerated.

3.6 Sanford people are strongly encouraged (and will be supported) to immediately report any Unlawful Discrimination, or breaches of this Policy to one of the following contacts:

- Your manager or supervisor;
- Any member of our Executive Leadership Team;
- Human Resources; or
- Through our Protected Disclosures (Whistleblowing) Policy.

3.7 The Sanford Protected Disclosures (Whistleblowing) Policy provides further guidance on the process to be followed for filing and handling complaints.

3.8 All people are asked to cooperate with any Sanford investigation and all complaints will be treated in a fair, confidential, and timely manner. Individuals will not suffer retaliation for reporting or participating in the investigation of a genuine complaint that is made in good faith.

4. Diversity, Equity and Inclusion Objectives

4.1 Sanford strives to employ the most appropriate person to support the achievement of our vision. Sanford is committed to increasing its diversity, equity and inclusion through training and awareness (such as unconscious bias training) and ensuring our people practices and processes are transparent, fair and free from any discrimination.

4.2 We will deliver against these commitments through the management and achievement of the following objectives:

- All shortlists for vacancies to include at least two people who self-identify as female, with a target of 50%, with the right competencies and experiences required for the role. Recruitment panels should have gender balance and consideration in relation to other diversity dimensions on the recruitment panel should also apply.
- All terms of employment to be fairly and equitably applied to all people in accordance with Sanford's remuneration and benefits framework.
- The Board and the Executive Leadership Team's target is to have at least 30% of members who self-identify as female.

4.3 Sanford plans to achieve its objectives through a mixture of qualitative and quantitative assessments throughout our business by promoting equality of opportunity, diversity, respect and inclusion in our:

- recruitment and selection
- terms and conditions of employment
- working environment
- training and development
- promotion, pay and career progression
- redundancy and redeployment

4.4 The objectives and Sanford's progress in achieving them will be assessed annually.

5. Responsibilities

5.1 Board

- The Board of Sanford is responsible for approving this Policy, including the setting of the objectives within it, and supporting a culture of diversity, equity and inclusion across Sanford.

5.2 People, Health and Safety Committee

- The People, Health and Safety Committee of Sanford is responsible for assessing management's strategies to increase inclusiveness, equity and diversity within Sanford and making recommendations to the Board.
- The People, Health and Safety Committee is also responsible for assessing the effectiveness of the approved strategies in attaining the objectives of this Policy.

5.3 CEO and Executive

- Management is responsible for the implementation and monitoring of this Policy.
- Management is responsible for developing and implementing the strategies approved by the Board and reporting on progress made to the People, Health and Safety Committee.
- Management provides leadership to actively promote diversity, equity and inclusiveness at Sanford by modelling appropriate behaviour and standards of conduct that includes making decisions that are based on merit, and by creating a work environment where all people of Sanford are treated with dignity, courtesy and respect.

5.4 Sanford Employees and Contractors

- Sanford employees and contractors should be aware of this Policy, ensuring their behaviors are aligned to it, and support any diversity, equity and inclusion initiatives implemented by Sanford.
- Sanford employees and contractors should behave appropriately in the workplace, treating colleagues and stakeholders fairly and equally, and adhere to this Policy in decision making in relation to employment and appointment of suppliers and contractors.
- Sanford employees and contractors are encouraged to challenge any behaviour in misalignment to this Policy and report any incidents that are inconsistent with Sanford's commitment to equal opportunity, diversity, equity and inclusion.

6. Compliance

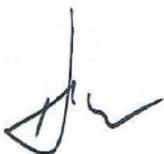
- 6.1 Any breach of this Policy may lead to disciplinary action, up to and including summary dismissal (or termination of existing contractual arrangements). In some circumstances, breaches of Human Rights or Employment Relations legislation may result in civil or criminal liability.

7. Ownership

- 7.1 This Policy is owned by the Chief People Officer of Sanford and will be updated every 3 years or as otherwise required.

- 7.2 Senior management are responsible for ensuring all employees and contractors are aware of the Policy and adhere to its principles and requirements.

Signed:



Sir Rob McLeod
Chair

Reviewed: July 2023