

Inclusion & Diversity

Policy

August 2020

2020 Page 1 of 6



Table of Contents

©2020

1	Purpose	3
2	Our Commitment	3
3	Why is Inclusion & Diversity important?	4
4	Support	4

Prepared by:	Reviewed by:	Approved by:
Anne Oxley; Technical Director	Mike Oxley, CEO	Paul Lush, Chairman

Brazilian Nickel	Inclusion & Diversity Policy		
Doc ID	Issue Date	Issue Status	Page No
SMS_POL_12-I&D Policy	01 08 2020	Rev A – Draft for Review	3/6

1 Purpose

This policy sets out Brazilian Nickel's expectations around the behaviour needed for an inclusive and diverse workplace. Brazilian Nickel (BRN) is an equal opportunity employer and does not discriminate on grounds of age, gender, race, national or ethnic origin, language, religion, political beliefs, sexual orientation or physical ability.

BRN's commitment to inclusion and diversity aligns with our values and is reflected in our code of conduct. It is also aligned with other BRN policies, including our Human Rights, Employment and Communities policies, our Environment, Social and Governance (ESG) framework and our Business strategy.

This policy is owned and supported by the BRN board and forms a key component of the culture at BRN that will support the long term sustainable success of our business.

2 Our Commitment

©2020

At BRN we aspire for our people to stand by the values of our business, with inclusion, diversity and respect at the core. By doing this, we aim to:

- Embrace and invite different perspectives, valuing diversity as a strength
- Make employment related decisions, including recruitment, promotion, training, development, and remuneration free from bias.
- Demonstrate fairness, trust and respect in all working relationships.
- Ensure that our people can achieve their full potential and they have equal opportunity to participate, learn and grow
- Hire, promote and engage a diverse workforce
- Provide an environment where people feel safe to speak up when things are not right or others are excluded.
- Challenge exclusionary behaviour, whether it is intentional or not.
- Develop strong and sustainable relationships with diverse stakeholders, including; shareholders, communities, employees, governments, customers and suppliers.
- Support flexible work arrangements, balancing business, team and personal needs.

Prepared by:	Reviewed by:	Approved by:
Anne Oxley; Technical Director	Mike Oxley, CEO	Paul Lush, Chairman

Brazilian Nickel	Inclusion & Diversity Policy		
Doc ID	Issue Date	Issue Status	Page No
SMS_POL_12-I&D Policy	01 08 2020	Rev A – Draft for Review	4/6

3 Why is Inclusion & Diversity important?

Inclusion and diversity is an imperative for the long-term sustainable success of our business, it is the right thing to do and enables us to:

- Deliver strong performance and growth by being able to attract, engage and retain diverse talent
- Support our people to reach their full potential by providing a work place where people are comfortable to be themselves and feel supported to perform at their best
- Challenge and innovate to achieve the best solutions and ideas by enabling us to tap into the diverse perspectives, experiences and knowledge of our workforce and wider stakeholders
- Optimise resources and manage risk by working collaboratively and eliminating structural and cultural barriers
- Protect and enhance our "licence to operate" by recognising, respecting and taking into account the needs and interests of our different stakeholders

4 Support

©2020

We all play a role in supporting inclusion and diversity and taking personal accountability for our behaviour and contribution;

All of our employees, contractors and partners are responsible for:

- Acting with integrity and respect and otherwise in accordance with our company values
- Role modelling the behaviours through everyday actions
- Recognising our own personal biases that may cause us unintentionally to exclude and work hard to overcome them
- Actively supporting inclusion and diversity in our teams and work environments
- Acting as inclusion and diversity champions advocating and supporting initiatives and programmes
- Contributing to creating an environment where everyone feels respected, valued and supported to perform at their best
- Speaking up if others appear excluded

Prepared by:	Reviewed by:	Approved by:
Anne Oxley; Technical Director	Mike Oxley, CEO	Paul Lush, Chairman

Brazilian Nickel	Inclusion & Diversity Policy		
Doc ID	Issue Date	Issue Status	Page No
SMS_POL_12-I&D Policy	01 08 2020	Rev A – Draft for Review	5/6

In addition to the above, the BRN Board and Executive Committee will:

- Establish the Group's purpose, values and strategy and satisfy themselves that these are aligned to the Group's desired culture.
- Establish and sponsor this Inclusion and Diversity policy
- Lead by example
- Guide the development of the Group's Inclusion and Diversity strategy and targets
- Fully consider the impact of diversity across every talent decision hiring, promoting, developing etc. and actively build diversity into their teams
- Actively drive improvement and monitor progress against plan

Leaders at BRN will:

©2020

- Fully consider the impacts of diversity across every talent decision they make hiring, promoting, developing etc. and actively build diversity into their teams
- Create an inclusive work environment where people feel respected, valued and supported to perform at their best
- Actively drive improvement and monitor progress against plan

BRN expects all employees in the group to aim to:

- always be inclusive, collaborative and supportive, be aware of the impact your actions can have on others and treat everyone equally and with respect;
- always make yourself aware of relevant cultural considerations and demonstrate respect when working with colleagues from other cultural backgrounds or travelling to different locations;
- support your colleagues to speak up if they believe they are experiencing harassment or bullying. If you witness this behaviour, you have a responsibility to speak up. Together, you and your line leader are responsible for ensuring that you:
 - o are clear on what is required of you in your job;
 - o work in a trustful and collaborative way with others;
 - o are treated fairly, with respect and care;
 - o value individual differences within your team

Prepared by:	Reviewed by:	Approved by:
Anne Oxley; Technical Director	Mike Oxley, CEO	Paul Lush, Chairman

Brazilian Nickel	Inclusion & Diversity Policy		
Doc ID	Issue Date	Issue Status	Page No
SMS_POL_12-I&D Policy	01 08 2020	Rev A – Draft for Review	6/6

And also expects that employees will never:

- behave in a way that is or may be perceived as offensive, insulting, intimidating, malicious or humiliating to others;
- make jokes or comments about an individual's characteristics including their race, gender, ethnicity, religion, sexual orientation, age, physical appearance, disability or other personal attribute;
- tolerate any form of discrimination or exclusionary behaviour;
- distribute or display any offensive material including inappropriate photos or cartoons;
- partake, or facilitate, hospitality or entertainment of an inappropriate nature (for example sexually oriented) or at inappropriate venues. This includes accepting or facilitating gifts of an inappropriate nature;
- engage in physically or socially intimidating behaviours;
- unlawfully discriminate in favour of, or against, someone based on personal attributes unrelated to job capabilities or performance;
- treat someone differently for taking or not taking part in industrial activities such as belonging or not belonging to an industrial association.

BRN is an equal opportunity employer and does not discriminate on grounds of age, gender, race, national or ethnic origin, language, religion, political beliefs, sexual orientation or physical ability. We work hard to develop systems and processes that are free from bias, enable flexibility and are designed to attract, retain and reward diverse talent and inclusive leaders. We are committed to developing and supporting productive, mutually beneficial and long-term relationships with local communities, suppliers and partners.

Prepared by:	Reviewed by:	Approved by:
Anne Oxley; Technical Director	Mike Oxley, CEO	Paul Lush, Chairman

©2020