DIVERSITY POLICY

1 INTRODUCTION

This Policy supports the Group's commitment to an inclusive workplace that embraces and values diversity whilst upholding the principle of meritocracy.

2 BENEFITS OF DIVERSITY

Diversity refers to the variety of differences between people in an organisation. Diversity encompasses gender, age, disability, ethnicity, marital or family status, religious or cultural background, sexual orientation and gender identity.

The Group is committed to diversity at all levels forming part of its merit-based organisational culture dedicated to the recruitment and retention of the best available talent at all levels, up to an including the Board.

Embracing diversity in its workforce contributes to the achievement of the Group's corporate objectives. The promotion of diversity can broaden the pool for recruitment of high quality employees, enhance employee retention, foster a closer connection with and better understanding of the Group's customers and improve corporate image and reputation.

Retaining the right people from a diverse pool of talented candidates, in turn may assist the Group to:

- (a) make more informed and innovative decisions, drawing on a wide range of ideas, experiences, approaches and perspectives that employees from diverse backgrounds, with different skill sets, bring to their roles; and
- (b) better represent the diversity of its stakeholders and markets.

3 COMMITMENT TO DIVERSITY

The Board is committed to achieving the goals of:

- (a) providing access to equal opportunities at all levels of work based on merit; and
- (b) fostering corporate culture that embraces and values diversity.

The Group is an equal opportunity employer. In order to have a properly functioning diverse workplace, discrimination, harassment, vilification and victimisation cannot and will not be tolerated.

4 RECRUITMENT OF SENIOR MANAGEMENT AND EMPLOYEES

The Group is committed to providing equal employment opportunity at all levels, based on merit, ability, performance and potential, in a way that contributes to the achievement of its corporate objectives, including diversity.

The Board is responsible for monitoring and promoting diversity of staff and the associated corporate culture, including by requiring that recruitment and selection processes at all levels are appropriately structured so that a diverse range of candidates are considered and that there are no conscious or unconscious biases that might discriminate against certain candidates.

5 ROLES AND RESPONSIBILITIES

All Employees of the Group are responsible for supporting and maintaining the Group's corporate culture, including its commitment to diversity in the workplace.

The Board is committed to workplace diversity, with a particular focus on supporting the representation of women at the senior level of the Group and on the Board.

The Board has determined to undertake the functions of the Diversity Committee until such times as the Board considers it necessary to appoint a separate committee to fulfil this role. The Diversity Committee is responsible for developing measurable objectives and strategies to meet the objectives of the Diversity Policy ("Measurable Objectives") and monitoring the progress of the Measurable Objectives through the review, evaluation and reporting mechanisms listed below.

6 STRATEGIES FOR ACHIEVING GENDER DIVERSITY

The Group's diversity strategies include where practical:

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

- (e) developing a culture which takes account of domestic responsibilities of employees (female and male) and identifying flexible work practices designed to assist them to meet those responsibilities; and
- (f) any other strategies the Board develops from time to time.

Measurable Objectives

The Board has set a target of maintaining at least 40% of Board and senior positions to be filled by women. As at 29 September 2021, 45% (5 of 11 people) who occupy these positions are women.

The Board will disclose the Measurable Objectives for achieving gender diversity set by the Board in accordance with the Group's Diversity Policy and its progress towards achieving them and the respective proportions of men and women on the Board and in senior positions.

7 MONITORING AND EVALUATION

The Diversity Committee is responsible for implementing, monitoring and reporting on the Measurable Objectives.

The Board will review progress against the Measurable Objectives on a regular basis.

8 INTERACTION WITH OTHER LEGISLATION

This Policy applies to the extent that it does not conflict with equal employment opportunity and anti-discrimination legislation in jurisdictions in which the Group operates.

9 REVIEW

The Board will review this Policy regularly so that it remains consistent with the Board's objectives, responsibilities and its legal and regulatory obligations.

10 DISCLOSURE

This Policy, and any updates, will be made available on the Group's website (www.advancedshare.com.au) in a clearly marked "Corporate Governance" section.

In addition, a summary of this Policy and the Group's achievement of the Policy's objectives (including progress towards achieving the Measurable Objectives referred to in section 6 above and respective proportions of men and women on the

Board, in senior positions and across the whole organisation will be disclosed in the Group's Corporate Governance Statement annually.

11 DEFINITIONS

General terms and abbreviations used in this Policy have the meanings set out below:

ASIC means the Australian Securities & Investments

Commission.

ASX means ASX Limited ACN 008 624 691 or the securities

market operated by ASX Limited, as the case may be.

ASX Listing Rules means the listing rules of the ASX, as amended from time

to time.

Board means the board of Directors of the Group.

Chair means the chair of the Board.

Company or Group means Advanced Share Registry Limited ACN 127 175 946

and its controlled entities as disclosed in its Annual

Reports.

Company Secretary means the company secretary of the Group.

Corporations Act means the Corporations Act 2001 (Cth).

Director means a director of the Group.

Employee includes executive Directors, managers and all other staff

engaged on a contract of employment or a salaried basis, and where the context requires, non-executive Directors.

Managing Director means the managing director, or equivalent chief

executive officer, of the Group.

Measurable Objectives means measurable objectives and strategies to meet the

objectives of this Diversity Policy.

Officer means a senior executive of the Group.

Policy means this Diversity Policy.