People Policy

Group Corporate

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1. Background

Praemium Limited (ASX:PPS) and each of its incorporated subsidiaries (Praemium) is committed to creating a supportive workplace that empowers our people to achieve their full potential. We are values driven and strive for excellence. Our success and the ability to execute our strategic plan depends on our high performing and engaged workforce.

Our goal is to build a workplace culture that fosters leaders and allows every person to thrive, contribute and grow. This Policy reflects our commitment to employees and to those with whom we work. It outlines the commitments we make to select and develop our employees, and to establish a work environment where everyone can take an active part in reaching our strategic goals while feeling a sense of pride in working at Praemium. We are committed to the success of all our employees. We believe talent is a competitive advantage, and our investment in our employees is consistent with that philosophy

2. Purpose

The purpose of the People Policy is to set internal guidelines for processes and practices regarding employees in line with best practice and the applicable laws and other applicable regulations.

The objective of the People Policy is to make sure Praemium respects and follows employment legislation and operates responsibly in all people activities.

In addition, the People Policy has the following objectives:

» Our employees have sufficient competencies to ensure the success of our strategy.

» The number, quality and permanence of employees are at a level required to achieve operational success.

» We encourage employees to perform well and motivate them to work to their best of ability.

3. Scope

The People Policy applies to all team members including directors, officers, employees, consultants and contractors.

4. Roles and Responsibilities

Roles	Responsibilities
Board	Approve the People Policy.
Remuneration & Nomination Committee	» Endorse the People Policy. » Monitor compliance with the Policy and report risks and issues to the Board as applicable. » Review and provide feedback on the People Policy to the Board.
Chief Executive Officer (**CEO**)	» Ensure that Praemium's practices and processes incorporate measures to support this People Policy. » Promote a culture of the People Policy compliance across Praemium.
Chief People & Culture Officer (CPCO)	» Review and report to the Nomination and Remuneration Committee, as appropriate, on the effectiveness of the measures established including broader trends, themes and/or risks that emerge. » Assist with the resolution of unacceptable behaviour complaints.
People Leaders	» Responsible for their people, implementing Praemium's policies, managing people processes and facilitating learning and development. » Lead and promote the implementation of the People Policy and create an environment that embraces our values.
Employees	» Conduct themselves in accordance with the People Policy. » Manage your career and continuous personal and professional development, using the appropriate and relevant programs.

5. Related Policies

The People Policy should be read in conjunction with Praemium's other detailed policies and standards including, but not limited to:

» Acceptable Workplace Behaviour Policy

» Occupational Health, Safety and Wellbeing Policy

» Whistleblower Policy

» Grievance Procedure

» Learning and Development Policy

» Recruitment and Selection Policy

» Social Media Policy

» Flexible Working Policy

It is important that employees are familiar with Praemium's policies and the expected standards of behaviours throughout employment.

6. People Principles

6.1. Values

We consistently demonstrate shared values, behaviours, and guidelines to support our risk management capabilities and culture. Our values are:

» We place our clients at the centre of everything we do
» We are devoted to collaboration and teamwork
» We are consistent and reliable

» We take ownership and champion continuous improvement
» We lead by example and influence positive results

We aim to clearly articulate our values and our behavioural expectations and incorporate these into our systems and practices and our interactions with regulators, clients and stakeholders.

6.2. Leadership of employees

A supportive leadership culture and good management practices contribute significantly to well-being at work.

Praemium manages employees in accordance with defined management principles. We invest in the development of leadership competency and people leaders are key to the successful implementation of this People Policy.

6.3. Diversity and inclusion

We recruit, develop, promote and pay our people in a way that supports our commitment to being more diverse and inclusive. Everyone has a part to play in actively and intentionally behaving with inclusion in mind. The Praemium Board sets and assesses annually our measurable objectives for diversity, and our progress in achieving them. The Board seeks to ensure it has an appropriate mix of diversity (including gender diversity), skills, experience and expertise to enable it to discharge its responsibilities effectively.

The Executive Leadership Team will develop a diversity and inclusion strategy and will promote diversity and inclusion initiatives. We aim to empower employees to work and grow together in a safe, flexible and inclusive way. A key focus is to leverage the diversity of skills to enhance the client experience and organisational growth.

6.4. Equality

Praemium will ensure adequate protection of employees from discrimination or violation of equal opportunities in accordance with employment legislation.

6.5. Equality of opportunity and non-discrimination

It is everyone's responsibility to consider the equal treatment of everyone in their own activities, both in their daily operations and in decision-making. In turn, efforts are made to systematically promote equality and non-discrimination.

Equality and non-discrimination ensure that all employees are treated fairly without discrimination based on irrelevant factors such as, age, race, religion, or gender. Praemium is committed to treating all people with dignity and respect. We firmly believe in the right of all people to work in an environment that is harmonious and free from discrimination or harassment, workplace bullying and victimisation.

Praemium has zero tolerance for all forms of discrimination or harassment against our employees by their peers, leaders, clients, or vendors.

We will address all bullying and harassment without delay. We expect our employees to follow Praemium’s values, Code of Conduct and the Acceptable Workplace Behaviour Standard in all workplace interactions and settings.

6.6. Recruitment

We recruit in a non-discriminatory and equal way in all positions and offer career opportunities to all. In hiring selections, we emphasise and assess candidates based on our values. The recruitment process is transparent and fair to all candidates and aims to provide internal and external candidates with a positive experience by ensuring clear communication, timely feedback, and respectful treatment throughout the hiring process. Candidates will be appointed based on merit, the requirements of any relevant legislation and the principles of diversity and inclusion.

6.7. Competence development and performance management

Competence is developed in a systematic manner based on our strategy. We continuously invest in deepening and maintaining the professional skills of our employees. We encourage employees to

develop their own professional skills through both learning at work and through the professional development offering.

We ensure that our employees have the necessary competence to succeed in their tasks, as well as clear goals and responsibilities. We ensure that our employees have the necessary tools, resources, and know-how to carry out the goals and tasks necessary to implement the strategy.

Praemium promotes and supports a culture of continuous learning which in turn support Praemium's retention and succession planning needs and the need to meet service delivery. Each employee is responsible for their own career and people leaders have an important role to play to support and coach team members.

6.8. Reward and Recognition

The aim of Praemium's Reward and Recognition Program is to attract, retain and engage our employees and to encourage excellent performance. In addition, our reward offering is aligned with our strategy and values and enables achievement of business objectives. The intent is to create a clear link between employee performance and total reward.

6.9. Remuneration

Praemium's Remuneration Philosophy is designed to support the achievement of our strategic goals and reward for proven results and excellent performance delivered in line with the Group's strategy, culture, and values. The Remuneration Philosophy supports Praemium in attracting, keeping, and motivating the best possible employees to deliver the development and results of Praemium. Praemium endorses transparency and fairness in all reward programs. To support successful implementation of company strategy, it is essential to maintain balance between market competitiveness and total cost of remuneration.

6.10. Wellbeing and Health Safety (WHS)

With adequate WHS, we take care of the well-being of our employees. Praemium promotes the comprehensive physical, mental and social well-being of our employees, and our goal is an employee experience that builds well-being. Activities that maintain work ability and well-being also in leisure time are encouraged.

The goal of our work safety activities is to guarantee a safe workplace for all employees and our visitors. We build a strong safety culture and continuously promote the mental and physical health, safety, and well-being of our employees, as well as their management in an inclusive manner.

We aim to ensure that our work environment is physically and psychologically healthy and safe.

Our employees and visitors must take reasonable care for their own health and safety, and that of others.

6.11. Flexible working

Praemium supports our people to balance their non-work commitments and interests with their career by supporting flexible working where this also allows us to meet the business requirements. This is outlined in the Flexible Working Standard. We recognise the shared benefits that working flexibly will result in for our people, our business, and our client service. It is open to all our employees, regardless of their circumstances, to discuss their flexible work arrangement needs

6.12. Social media

We encourage employees to have an active voice on social media whether it be engaging with potential clients or current clients or commenting on activities about Praemium. We provide the opportunity for employees to participate in open, constructive, and safe discussions. We provide guidelines through our Social Media Standard and Code of Conduct that aims to give our employees the guidance they need to represent Praemium's brand and values accurately within social networks when posting. This includes always being respectful of others, keeping discussions on-topic, using appropriate language and ensuring that all Praemium policies and values are adhered to.

7. Implementation Framework

To support and demonstrate these Policy principles and commitments, Praemium has:

» Established a People and Culture vision and mission and developed a 12-month People and Culture Plan that outlines initiatives that are in line with the strategic direction.

» Established a structured Performance Management Framework where everyone can take an active part in reaching Praemium's strategic goals. Also, through the performance framework and engagement surveys we invest in ongoing dialogue with our employees.

» Established a Reward and Recognition Program that rewards behaviour and achievement aligned to our values.

» Established a succession planning process to identify successors both short and long term for critical jobs and developed development plans for talented employees.

» Established an Acceptable Workplace Behaviour Policy to mitigate all forms of unlawful discrimination and harassment. The Policy outlines that we do not discriminate against one another based on national origin, race, religion, gender, sexual orientation, disability, age, or any other attribute that is protected by law.

» Established a Code of Conduct that clearly articulates our values, our behavioural expectations and promotes a workplace culture that encourages responsible business practices.

» Established Policy Standards and Procedures which outline the remuneration and benefits offered to employees. The Standards and Procedures ensure equity, consistency and fairness.

» Established Policy Standards and Procedures to support the WHS of employees including external support services such as confidential counselling.

» Established a competency framework that outlines the skills, attitudes and behaviours employees need to complete their tasks well.

» Established an accountability and learning and development framework to support capacity and capability building of employees. The framework clearly defines roles and responsibilities, induction, targeted development, study leave, training and development for our employees to successfully carry out their role.

» Established recruitment practices that place, promote, compensate and retain employees based on their qualifications for the work to be performed, including experience, merit, and other work-related criteria. We welcome employees from a wide range of cultures and races.

» Established Policy Standards and Procedures that ensures employees can raise questions and concerns and in turn encourage our people to live by a 'Don't Walk Past' philosophy. We also have a formal process for anonymously raising workplace complaints; all allegations raised through this process are appropriately investigated and corrective action is taken when merited. We prohibit retaliation toward an employee bringing forward a complaint, grievance or question.

8. Non-Compliance

Any non-compliance with and breach of this Policy will be taken seriously, and will be subject to further investigation, and may result in disciplinary action. In assessing non- compliance, each matter will be considered on a case-by-case basis according to its merits. Considerations may include the level of non-compliance, reasons for non-compliance (e.g. training), frequency and any other relevant circumstances.

9. Definitions

Definition	Meaning
Bullying	Repeated and unreasonable behaviour directed towards an employee or a group of employees that create a risk to health and safety. Bullying can be minor inappropriate behaviours, each of minimal effect when viewed in isolation from each other and when combined, demonstrate a systematic and significant episode of bullying when experienced over a period. For example, aggressive or intimidating conduct, belittling or humiliating comments, spreading malicious rumours.

Definition	Meaning
Discrimination	An employee or prospective employee is treated unlawfully or differently due to certain characteristics or treating someone unfairly or differently because of legislative attributes such as gender identity or expression, age, pregnancy or potential pregnancy, race (including colour, ethnicity, and descent) etc.
Diversity and inclusion	Employees consist of individuals who bring new perspectives and backgrounds to the table. Inclusion means that everyone in the diverse mix feels involved, valued, respected, treated fairly, and embedded in your culture.
Equity	Employees are provided with fair and equal opportunities based on their individual needs. Equity recognises that not all employees are afforded the same opportunities and addresses the imbalance of opportunities available to them.
Flexible working	An agreement between Praemium and an employee to change the standard working arrangement to better accommodate an employee's commitments out of work. Flexible working arrangements usually encompass changes to the hours, pattern and location of work.
Grievance	Relates to any matter connected to the employee's employment which has implications for the employee's employment. For example, an interpersonal conflict between the employee and another employee.
Harassment	Unwelcome behaviour that makes a person feel belittled, intimidated, offended or apprehensive, and that a reasonable person, considering all the circumstances, would expect to cause offence, intimidation, or apprehension.
Merit recruitment	The process of determining which candidates have the abilities, knowledge, and skills considered the most suitable for the job.
Remuneration philosophy	The formal statement documenting Praemium's position about employee remuneration (including fixed and variable pay). It explains the "why" behind employee pay and creates a framework for consistency. It is used to attract, retain and motivate employees.
Reward and Recognition Program	Initiatives that Praemium use to encourage specific behaviours from employees including benefits, recognition in the form of remuneration.
Sexual harassment	Sexual harassment is behaviour of a sexual nature, which is unwelcome and has the effect of offending, intimidating, or humiliating the person being harassed.
Social media	The online and mobile tools that employees use to share employer opinions about Praemium. For example: information, experiences, images, and video and includes websites and applications used for social networking. Common sources of social media include, but are not limited to, LinkedIn, blogs and discussion forums and message boards.
Succession planning	The process of identifying the critical positions within your organization and developing action plans for individuals to assume those positions.
Victimisation	Any conduct which disadvantages a person because the employee has complained, or intends to complain, about being harassed, sexually harassed, discriminated against, bullied, or vilified. Examples include an employee being denied a development opportunity because they have lodged a complaint. or being ostracised by team members.
Work health and safety (WHS)	WHS means managing risks to the health and safety of everyone in your workplace. This includes employees, visitors and suppliers.