



# Diversity & Inclusion Policy



## 1. Purpose

We're all different and at Coles, we know that's a good thing. We're making Coles an organisation where everyone feels like they belong.

Coles is committed to developing and maintaining an inclusive workplace that embraces and celebrates diversity.

Coles vision for diversity and inclusion is to foster a safe, respectful, inclusive and diverse workplace that is reflective of the community and customers we serve. We know we are a team that is better together.

Coles recognises that diversity and inclusion improves our ability to attract, retain, motivate and develop the best talent, create an engaged workforce, deliver the highest quality services to our customers and continue to grow the business.

This Diversity & Inclusion Policy (**Policy**) is intended to set out the guiding principles and practices which underpin Coles approach to developing and maintaining a diverse and inclusive workplace.

Coles acknowledges the Traditional Custodians of Country throughout Australia and pays its respects to elders past and present. We recognise their rich culture and continuing connection to land and waters.

## 2. Policy Application

This Policy applies to all Coles team members, contractors, consultants and work experience participants (referred to in this Policy as **team members**) across all the operations and activities of Coles Group Limited and its subsidiaries (**Coles**).

## 3. Policy Requirements

### 3.1 Principles

As part of the Diversity and Inclusion Strategy (**D&I Strategy**), Coles has stated objectives relating to the following diversity and inclusion focus areas:

- **Gender equity:** sustain a gender **balanced** workforce to benefit all of us;
- **Indigenous engagement:** provide **more** meaningful career, engagement and business opportunities for our Aboriginal and Torres Strait Islander team and communities to advance social outcomes;
- **Accessibility:** recognise and enable people with all kinds of abilities;
- **Cultural diversity:** reflect Australia's diverse multicultural community in our team, leadership and customer offerings; and
- **Pride:** champion LGBTQI+ inclusion in the workplace and beyond.

## 3.2 Promoting diversity and inclusion

In order to facilitate greater diversity and inclusion in our workforce, including in the diversity and inclusion focus areas, Coles management and those in leadership roles will:

- apply diversity and inclusion principles, including demonstrating leadership and vision, as well as considering diversity and inclusion in processes impacting our team members, suppliers, customers and community engagement;
- ensure outcomes from our key people and culture processes, including recruitment, performance reviews, promotion, career development, succession planning, and reward and recognition, are based on fairness, equity and performance;
- progress towards and maintain the measurable objectives outlined in this Policy;
- ensure diversity and inclusion principles are included in key projects, programs and initiatives, and offer equal access to opportunities;
- implement programs and policies which address impediments to diversity and inclusion in the workplace (such as providing access to paid parental leave, flexible working arrangements and learning and development opportunities), and review these programs and policies to ensure that they are accessible, available and utilised by all team members when appropriate;
- fund these programs appropriately and monitor the effectiveness of and continue to expand upon existing initiatives designed to identify, support and develop talented team members from a diverse range of backgrounds;
- empower team members to grow and develop in an inclusive, respectful, safe and flexible way;
- make reasonable efforts to understand reasons for resignations;
- apply diversity and inclusion principles as part of significant organisational changes;
- support fair remuneration and the objectives of pay parity;
- continue to ensure Coles is an equal opportunity employer; and
- observe relevant laws in this area that apply in all jurisdictions in which Coles operates, including across Australia and overseas.

## 3.3 Measurable objectives

Each year the Board will set external measurable objectives with a view to progressing towards and maintaining a diverse representation in our workforce, senior management and other leadership roles. This includes gender, indigenous and cultural diversity, as well as an inclusive workforce. For example, this may be measured by engagement.

These objectives, and our progress is set out in our annual Coles Sustainability Report.

Internal measurable objectives may also be set to monitor progress in other focus areas set out in section 3.1 of this Policy.

## 3.4 Accountabilities

All diversity and inclusion programs and initiatives at Coles will be monitored by the Diversity and Inclusion Council (**D&I Council**) who will report on progress and make recommendations to the Board.

Performance against these programs and initiatives will be reviewed annually by the Board, as part of its annual review of the effectiveness of this Policy.

The Board will include in the Annual Report each year:

- a summary of Coles' progress towards achieving the measurable objectives set under this Policy for the year to which the Annual Report relates; and
- details of the measurable objectives set under this Policy for the subsequent financial year.

**Line managers** are accountable for:

- creating and maintaining an inclusive workplace by role modelling inclusive behaviours and communicating their commitment to the principles set out in this Policy;
- minimising bias in relation to decision making and ensuring consistency of approach in diversity and inclusion initiatives;
- ensuring their teams adhere to the principles set out in this Policy and relevant Coles' policies, including the Code of Conduct and Appropriate Workplace Behaviour Policy; and
- promptly addressing inappropriate behaviours in relation to diversity and inclusion, in line with the Code of Conduct and any other relevant policies.

**Team members** are accountable for:

- contributing to, and maintaining, an inclusive workplace;
- speaking up if they see inappropriate behaviours in relation to diversity and inclusion; and
- respecting the diversity of others and demonstrating inclusion through the Coles values and adherence to Coles' policies, including our Code of Conduct and Appropriate Workplace Behaviour Policy.

### 3.5 Disclosure of Policy objectives

Coles' achievement of this Policy's objectives will be disclosed in across its annual reporting suite, including the Coles Corporate Governance Statement, Annual Report and Sustainability Report.

In its Annual Report, Coles will also disclose the gender and other diversity compositions of our workforce as a whole and in leadership positions, as well as the gender composition of the Board.

Coles will also meet any external reporting obligations regarding diversity and inclusion as appropriate, including disclosing gender equality indicators as defined by the *Workplace Gender Equality Act 2012* (Cth) and other diversity related frameworks and standards.

### 3.6 Review of Policy

The Board is responsible for the review and oversight of this Policy.

Management will periodically:

- review:
  - the effectiveness of this Policy, its objectives and the strategies to achieve the objectives; and
  - the division of responsibilities and accountability for developing and implementing diversity and inclusion initiatives across Coles; and
- report to the Board on the outcomes of its review, including any recommendations for change to those strategies or the way in which they are implemented.

Adopted by the Board on 14 September 2023.