People Policy

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1.

Background

Praemium Limited (ASX:PPS) and its incorporated subsidiaries (Praemium) are committed to creating a supportive, safe and inclusive workplace where our people can perform at their best, contribute to our strategy and develop their careers. Our people practices are guided by our values, responsible business conduct and applicable legal and regulatory obligations.

Our goal is to build a workplace culture in which people are treated fairly and with respect, different perspectives are valued, and everyone has an opportunity to thrive, contribute and grow. This Policy sets out the principles that guide how Praemium attracts, supports, develops, recognises and rewards its people.

2. Purpose

The purpose of this Policy is to establish the principles that guide Praemium's people practices and decision-making, consistent with applicable laws, regulatory obligations, our values and related policies, standards and procedures.

The objective of the Policy is to support lawful, fair, consistent and responsible people practices across Praemium.

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 continuity of employees is at a level required to achieve operational success.

» We encourage employees to perform well and support them to work to the best of their 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 Policy compliance across Praemium.
Chief Risk, Compliance and People Officer	» 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 and Standards

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

» Code of Conduct and Acceptable Workplace Behaviour Policy

» Occupational Health, Safety and Wellbeing Policy

» Whistleblower Policy

» Grievance Procedure

» Recruitment and Selection Procedure

» Social Media Guideline

» Flexible Working Guideline

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 customer at the centre of everything we do
» We are devoted to collaboration and teamwork
» We are consistent, reliable and deliver high quality
» 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 leadership capability and people leaders are key to the successful implementation of this Policy.

6.3. Diversity and inclusion

Praemium is committed to a workplace that values diversity, supports equity and fosters inclusion. We recognise that different backgrounds, experiences, perspectives and ways of thinking strengthen decision-making, innovation, employee experience and client outcomes. Our approach is embedded in this Policy and in our people practices, rather than managed through a separate Diversity Policy. The Board sets and assesses measurable diversity objectives and monitors progress. The Executive Leadership Team and People & Culture Team support initiatives and practices that advance diversity, equity and inclusion. People leaders are expected to create inclusive team environments, make fair and evidence-based decisions, address barriers to participation and provide equitable access to opportunities.Equity and fair treatment

6.4. Equity and fair treatment

Praemium is committed to fair and respectful treatment. Equity recognises that people may have different needs and may require different support or adjustments to access opportunities and participate fully at work. People decisions will be based on relevant, objective and lawful considerations.

6.5. Equal opportunity and non-discrimination

Everyone is responsible for supporting equal opportunity, inclusion and non-discrimination in day-to-day work, interactions and decision-making. Praemium does not tolerate unlawful discrimination, harassment, bullying, vilification or victimisation. Employment-related decisions, including recruitment, development, promotion, remuneration and access to opportunities, must be made fairly and without unlawful discrimination. Praemium is committed to treating people with dignity and respect and to providing a workplace that is safe, inclusive and free from unacceptable behaviour. These expectations apply to conduct by employees, leaders, contractors, consultants, clients, suppliers and other people encountered through work. Concerns will be managed promptly, fairly and in accordance with the Code of Conduct and Acceptable Workplace Behaviour Policy, Grievance Procedure and other relevant processes.

6.6. Recruitment

Employees are expected to follow Praemium's values, this Policy, the Code of Conduct and Acceptable Workplace Behaviour Policy, and related standards in all work-related interactions and settings.

We recruit and select people through fair, transparent and merit-based processes. Decisions are based on the inherent requirements of the role, relevant skills, experience, capability, values alignment and potential to perform. We aim to provide internal and external candidates with an inclusive and respectful experience, and to reduce unnecessary barriers that may limit participation by people from different backgrounds.

6.7. Competence development and performance management

Competence is developed systematically based on our strategy. We invest in maintaining and deepening employees' professional skills through learning at work and professional development. Employees are supported with clear goals, responsibilities, tools and resources. Each employee is responsible for their career, and people leaders support and coach team members. Reward and Recognition

6.8. Reward and recognition

Praemium's Reward and Recognition Program aims to attract, retain and engage employees and encourage excellent performance. Our reward offering is aligned with our strategy and values and supports business objectives.

6.9. Remuneration

Praemium's Remuneration Philosophy supports achievement of our strategic goals and rewards proven results and excellent performance in line with the Group's strategy, culture and values. Praemium endorses transparency and fairness in reward programs. Wellbeing, Health and Safety (WHS)

6.10. Wellbeing, Health and Safety (WHS)

Praemium promotes employees' physical, mental and social wellbeing. We aim to provide a physically and psychologically healthy and safe work environment. Employees and visitors must take reasonable care for their own health and safety and that of others. Flexible working

6.11. Flexible working

Praemium supports people to balance non-work commitments and interests with their career through flexible working where this also meets business requirements. Employees may discuss flexible work arrangement needs regardless of their circumstances. Social media

6.12. Social media

Praemium provides guidelines through its Social Media Standard and Code of Conduct and Acceptable Workplace Behaviour Policy to help employees represent Praemium's brand and values appropriately on social networks, including being respectful, using appropriate language and complying with applicable policies.

7. Implementation Framework

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

» Established a People and Culture plan aligned with Praemium's strategic direction, including initiatives that support employee experience, capability, wellbeing, diversity, equity and inclusion.
» Established a structured performance management framework and engagement surveys to support dialogue with employees.

8. Non-compliance

Established policy standards and procedures supporting remuneration, benefits, health, safety and wellbeing. Established capability, accountability, learning and development frameworks. Established a Code of Conduct and Acceptable Workplace Behaviour Policy that sets expectations for respectful and inclusive conduct and addresses unlawful discrimination, harassment, bullying, vilification and victimisation. Established recruitment and selection practices that are fair, transparent, inclusive and merit-based, with decisions based on role requirements, relevant capability and other lawful work-related criteria. Established channels and procedures through which employees may raise questions and concerns, including formal and anonymous reporting processes, with concerns investigated and corrective action taken where warranted. Retaliation against a person who raises a concern is prohibited. Non-Compliance

Any non-compliance with, or breach of, this Policy will be taken seriously, may be investigated and may result in disciplinary action. 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, 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.
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.

Definition	Meaning
Merit recruitment	The process of determining which candidates have the abilities, knowledge, and skills considered the most suitable for a role.
Remuneration philosophy	The formal statement of Praemium's position on employee remuneration, including fixed and variable pay.
Reward and Recognition Program	Initiatives that Praemium uses to recognise and encourage employee behaviours and achievements.
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	Online and mobile tools used to share information, opinions, experiences, images and video.
Succession planning	Identifying critical positions and developing action plans for people 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)	Managing risks to the health and safety of everyone in the workplace, including employees, visitors and suppliers.