

DIVERSITY POLICY

1. INTRODUCTION

Bentley Capital Limited ABN 87 008 108 218 (ASX:BEL) (the **Company**) is committed to diversity in the workplace. The Company's policy is to recruit and manage on the basis of competence and performance regardless of age, nationality, race, gender, religious beliefs, sexuality, physical ability or cultural background. The Company recognises the benefits from employee and Board diversity.

The Board recognises that diversity offers a broad spectrum of benefits including:

- access to a larger pool of quality employees;
- improved employee retention;
- insight into different ideas and perspectives, fostering innovation; and
- benefiting from all available talent.

The Board of Directors is responsible for adopting and monitoring the Company's Diversity Policy.

2. OBJECTIVES

The Diversity Policy provides a framework for the Company to achieve the following objectives:

- a diverse and skilled workforce, resulting in continuous improvement in company performance and the achievement of corporate goals;
- a work environment that values and utilises the contributions of employees with diverse backgrounds, experiences, and perspectives;

- a workplace culture characterised by inclusive practices and behaviours for the benefit of all staff;
- A workforce that best represents the talent available in the communities in which the Company's assets are located and our employees reside;
- improved employment and career development opportunities for women;
- an environment that encourages the development of necessary skills and experience for leadership roles;
- awareness in all staff of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity; and
- a workplace that is free from all forms of discrimination and harassment.

3. STRATEGIES

Strategies to help achieve the objectives include:

- facilitating a workplace culture that takes into account domestic responsibilities of employees including flexible work options and return to work policies;
- mentoring programmes;
- facilitating training to staff who are from diverse backgrounds to enhance the retention of new employees and promotion of existing employees;
- recruiting from a diverse pool of candidates for all positions, including senior management and Board appointments; and

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- reviewing succession plans to ensure an appropriate focus on diversity.

4. RESPONSIBILITIES

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

The Board is responsible for developing measurable objectives and strategies to meet this policy including gender diversity, and monitoring the progress of such measurable objectives through the monitoring, evaluation, and reporting mechanisms noted below.

The Board will conduct Board appointment processes in a manner that promotes diversity, including establishing a structured approach for identifying a pool of candidates in line with its skills matrix and using external experts where necessary.

5. MONITORING AND EVALUATION

The Executive Chairman and Company Secretary are responsible for implementing, monitoring and reporting on measurable objectives as established by the Board and will be reviewed by the Board annually.

6. PUBLICATION OF POLICY

This Policy is made available to all personnel and published on the Company website at: <http://bel.com.au/corporate-governance>