DIVERSITY POLICY

EDU Holdings Limited
ACN 108 962 152

Last reviewed on 26 February 2026

DIVERSITY POLICY

1 INTRODUCTION

EDU Holdings Limited ACN 108 962 152 (**Company**) and its subsidiaries (the **Group**) recognises the inherent value in having a diverse workforce and is committed to the maintenance and promotion of workplace diversity. The Company values and respects the unique contributions of people with diverse backgrounds, experiences and perspectives. The Company has no tolerance for discrimination, harassment, vilification or victimisation.

2 OBJECTIVES

The Group is committed to:

(a) promoting a workplace culture that recognises and embraces the skills, characteristics, perspectives and experiences that people bring to the Company, regardless of their age, gender, ethnicity, cultural background, religious beliefs, ability or disability, gender identity, marital or family status, socio-economic background and sexual orientation;

(b) fostering an environment in which discrimination, harassment, vilification and victimisation is not tolerated; and

(c) adhering to its gender reporting requirements and reviewing its processes to ensure it eliminates any overt or covert factors contributing to discriminatory outcomes in candidate selection and internal promotions.

3 STRATEGIES

This policy provides a framework for new and existing diversity related initiatives and polices within the Group. The strategies outlined below aim to achieve the objectives of this policy by:

(a) setting and reviewing measurable objectives relating to diversity and assessing the Company's progress in achieving these objectives on an annual basis;

(b) ensuring that recruitment and selection practices at all levels are appropriately structured so that a diverse range of candidates are considered;

(c) designing and implementing programs and processes that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare them for more senior positions;

(d) adopting flexible work practices that will assist team members to meet changing domestic responsibilities throughout their careers;

(e) providing opportunities for employees on extended parental leave to maintain their connection with the Company, by offering them an option (without any obligation) to receive all-staff communications and to attend work functions and training programs; and

(f) embedding the extent to which the Board has achieved the objectives of this policy in the evaluation criteria for the annual Board performance review.

4 MEASURES AND ACCOUNTABILITIES

4.1 Measurable objectives

Each year, the Board (or its delegated Committee) will set measurable objectives for achieving positive diversity outcomes in the composition of its Board, senior management and workforce generally. The objectives will include appropriate and meaningful benchmarks that are able to be monitored and measured, such as:

(a) setting specific numerical targets for diversity in the composition of the board, senior executive roles and the workforce generally within a specified timeframe;

(b) setting specific numerical targets for diversity in key operational roles within a specified timeframe; or

(c) if applicable, achieving specific targets for Gender Equality Indicators as defined in the *Workplace Gender Equality Act 2012* (Cth).

Diversity will incorporate a number of factors, including but not limited to age, gender, ethnicity, cultural background, religious beliefs, disability, gender identity, marital or family status, socio-economic background and sexual orientation.

4.2 Annual review

Performance against these objectives will be reviewed annually by the Board (or its delegated Committee) as part of its annual review of the effectiveness of this policy.

The Board will consider the extent to which the achievement of these measurable objectives should be tied to key performance indicators for the Board, the Chief Executive Officer and other senior executives.

4.3 Disclosure

The Company will disclose in the Company's Corporate Governance Statement each year:

(a) the measurable objectives for achieving diversity set by the Board in accordance with this policy and its progress towards achieving them; and

(b) the respective proportions of men and women on the Board, in senior executive roles and across the Company or, if applicable, the Company's most recent Gender Equality Indicators as defined in the *Workplace Gender Equality Act 2012* (Cth).

If the Company undertakes a gender pay equity audit (which must be approved by the Board), the Board will consider the results of any such audit and any disclosure related issues.

5 RECRUITMENT, SELECTION AND SUCCESSION PLANNING

5.1 Recruitment, selection and promotion

The Company will ensure that recruitment, selection and promotion processes at all the levels in the Company, including at the Board level, are designed so that a diverse range of candidates are considered. The Company will ensure that:

(a) recruitment and selection is based on merit;

(b) the Company complies at all times with equal opportunity and anti-discrimination requirements;

(c) the Company encourages management involved in recruitment to consider workplace diversity when making selection decisions;

(d) the Company makes its recruitment process accessible to a diverse range of candidates by advertising positions broadly and by using professional recruitment agencies where required; and

(e) the Company considers programs and initiatives that assist in the development of a broader pool of skilled and experienced employees which, over time, will prepare them for more senior positions.

5.2 Succession planning

The Board (or its delegated Committee) will be responsible for the development and succession planning process for the Chief Executive Officer and other senior executive roles. In discharging this responsibility, the Board (or its delegated Committee) will have regard to diversity criteria.

5.3 Board appointment process

The Board (or its delegated Committee) will ensure selection and appointment of new directors is transparent and considers all facets of diversity to minimise "group-think" or other cognitive biases in decision making. The Board (or its delegated Committee) will have regard to the following when appointing new directors:

(a) whether the skills, expertise and background of the candidate add to and complement the range of skills, expertise and background of the existing Directors;

(b) diversity; and

(c) the extent to which the candidate would fill a present need on the Board.

6 REVIEW OF POLICY

This policy will be reviewed periodically and updated as required to ensure it remains consistent with current law and practice. The latest version of this policy can be found on the Company's website or obtained from the Company Secretary.

7 REVISIONS

VERSION	APPROVAL DATE	EFFECTIVE DATE	DETAILS
1.3	26 February 2026	26 February 2026	Minor revisions approved by resolution of the Board.
1.2	26 February 2025	26 February 2025	Minor revisions approved by resolution of the Board.
1.1	27 February 2024	27 February 2024	Minor revisions approved by resolution of the Board.
1.0	23 February 2022	25 February 2022	Policy approved by the Board.