

BETHUNES INVESTMENTS LIMITED (the **Company**)

EQUAL OPPORTUNITY POLICY

Bethunes Investments Limited, Wellington, New Zealand

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1. OBJECTIVES

Bethunes Investments Limited ("BIL") favours people who believe any goal is achievable. Those who understand hard work, teamwork, generate ideas, use company money wisely, work with integrity, and are energetic, enthusiastic and determined. BIL recognises that diversity of thought is a key contributor to our business success.

BIL is therefore committed to promoting diversity of thought and providing a respectful environment where everyone in the workplace is treated fairly and all decisions are based on merit. Our policy is to recruit the right people for the right job regardless of race, gender, age, marital status, disability, sexual orientation, nationality, political or religious beliefs, or any other factor not relevant to their competence and performance.

2. DIVERSITY OF THOUGHT STRATEGIES

BIL seeks to maintain and improve diversity of thought through a range of strategies:

- 1. Recruiting and managing based on merit, skills and qualifications;
- 2. Promoting a culture that supports difference and that enables each member of our team to fully contribute to the best of their ability;
- 3. Providing a respectful environment where everyone is treated fairly and all decisions are based on merit;
- 4. Recognising and appreciating the diverse skills, knowledge and backgrounds of our team;
- 5. Providing a workplace that is free from discrimination and harassment.

3. ACCOUNTABILITIES

BIL's Board of Directors is responsible for ensuring that this policy is implemented. This policy will be reviewed regularly and updated as required. Supporting diversity of thought, and ensuring opportunities are provided solely based on merit, skills and qualifications is the responsibility of everyone engaged in activities under BIL's operational control.

4. REVIEW AND COMMUNICATION OF POLICY

This policy will be updated as required.

The Board will communicate this policy to the Company and to its shareholders in the interests of transparency and accountability, and to better promote achievement of the objectives of this policy.

5.AUTHORISATION

This Bethunes Investments Limited - Equal Opportunity Policy has been agreed by the Board of Bethunes Investments Limited:

30-9-18

Board Meeting Date

Bethunes Investments Limited Chairman 30/2/15.