

FRONTIER CAPITAL GROUP LIMITED

DIVERSITY POLICY

The Company is committed to providing an environment in which all employees and consultants are treated with fairness and respect, and have equal access to opportunities available at work. The Company believes diversity enables it to attract people with the best skills and attributes, and contributes to the achievement of the Company's corporate objectives.

DIVERSITY AT FRONTIER CAPITAL GROUP LIMITED

Diversity at the Company refers to all the characteristics that make individuals different from each other. The Company takes positive steps to ensure that current and prospective employees are not discriminated against, either directly or indirectly, on the characteristics such as gender, age, disability, marital status, sexual orientation, religion, ethnic or any other area of potential difference. We value the differences, needs and contributions a diverse workforce represents.

The Company extends this positive attitude in respect of diversity to our consultants and stakeholders.

GENDER DIVERSITY

The Company is committed to gender diversity at all levels of the organisation. Gender equality is a key component of the Company's diversity strategy.

Subject to the current size and operations of the Company the Board is strongly committed to increasing the representation of women at senior levels of management.

POLICY

The Diversity Policy applies to all employment levels of the Company including professional consultants. The Company seeks to employ, retain and develop employees for the long term assisting in their development and the development of the culture and values of the Company.

This is achieved by promoting the value of different perspectives, ideas and benefits brought by engaging employees from all available talent. This Policy takes notice of the principles of good corporate governance and best practice recommendations as established by the ASX Corporate Governance Council (ASX Principles). However this is not incorporated into (and does not form a part of) that policy.

The Company is committed through the application of its Diversity Policy to creating an environment where:

- (a) there is a tolerance of difference. The Company will ensure that all employees and consultants are treated fairly and with respect and dignity;
- (b) the ability to contribute and access opportunities is based on merit. The Company will adopt and actively encourage those practices and procedures that enable employees and consultants to contribute to the best of their ability; and
- (c) inappropriate attitudes or behaviours are confronted. The Company will treat seriously any instance of inappropriate behaviour and confront attitudes based on inappropriate stereotypes.

RECRUITMENT

The Company is committed to promoting a corporate culture which embraces diversity. Professional recruitment agencies may be engaged by the Board or Nomination and Remuneration Committee when selecting candidates for new directors and employees. This will ensure prospective employees or new directors are selected from a diverse pool of qualified candidates.

Documentation, including person specifications, job advertisements, application forms and contracts will include no direct or inferred discrimination. Company procedures including interviews, reference checking and testing will be undertaken in such a way so as to ensure the absence of discriminatory practice.

Ongoing diversity training and education are available to Directors and Senior Executives, to ensure all employees are treated fairly and evaluated objectively. Diversity training encompasses raising awareness about issues surrounding diversity and developing diversity management skills.

All decisions associated with career advancement, including promotions, transfers and other

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assignments will be determined on merit.

RESPONSIBILITY

In order for this policy to operate, it is essential that employees at all employment level are responsible for the elimination of discriminatory practices, and for the creation of a diverse and tolerant workplace.

Remuneration and Nomination Committee or the Board as a whole is responsible for:

- (a) Implementation of the diversity policy;
- (b) Ensuring compliance with the diversity policy;
- (c) Ongoing monitoring of the diversity policy as well as progress against achieving the measurable objectives set by the Board;
- (d) Reviewing the progress against the company's diversity strategy and identifying any changes or new initiatives required to improve diversity; and
- (e) Assessing (at least annually) the measurable objectives for achieving gender diversity and the progress in achieving them.

BREACH OF POLICY

Disciplinary action, which may include dismissal, will be taken against anyone found to be guilty of a breach of this policy.