



COMVITA LIMITED DIVERSITY & INCLUSION POLICY

Approved by the Comvita Board: October 2025

Next Review Date: October 2026

INTRODUCTION

Comvita Limited and its subsidiaries ("Comvita") are committed to diversity in employment, as well as inclusion and engagement of individuals at all levels of the organisation. This commitment extends to our customers and the communities we serve. We are dedicated to creating a workplace free from discrimination, where everyone feels valued, included and diversity is respected. Our culture of belonging unites diverse backgrounds, beliefs, abilities and experiences, ensuring that everyone works together to achieve meaningful outcomes.

We recognize that diversity is a strength that enriches our organisation and that every individual should have the opportunity to contribute, thrive, and belong, free from barriers to participation. This commitment extends across all areas of our business and is guided by our values and purpose-led approach to creating positive outcomes for people and nature.

Comvita believes that embracing diversity, equity, and inclusion is critical to achieving our strategic goals. It enhances our ability to attract, recruit, and retain top talent, reflect the needs of our stakeholders and markets, and improve decision-making at all levels, including within leadership and the Board. This commitment is reflected in our values, behaviours, and our dedication to upholding fundamental human rights, as outlined in our Code of Ethics.

PURPOSE AND SCOPE

The purpose of this policy is to support the development of a diverse and inclusive culture across Comvita by embedding principles of equity, belonging, and respect into how we work. It is intended to guide our decisions and behaviours in fostering an environment where all individuals can contribute, thrive, and be valued.

This policy applies to all individuals connected to Comvita's operations and value chain globally. This includes, without limitation, our employees, contractors, outsourced staffing providers, external suppliers, partners, and customers.

DEFINITIONS

Diversity in this policy encompasses (without limitation) all social identities including gender (including gender reassignment), marital status, ethnicity, age, sexual orientation, education, socioeconomic background, religious and cultural background and beliefs, pregnancy, breastfeeding, caregiver status, neurodiversity and disability.

A commitment to an inclusive culture means seeking out, identifying, understanding, and removing barriers to full participation and belonging and encouraging high levels of both individuality and belonging.

OUR COMMITMENTS

Comvita is committed to fostering a workplace culture that upholds the dignity, inclusion, and equitable treatment of all people, and removes barriers to full participation, including bias, micro-aggressions and discrimination;. This commitment to diversity, equity, and inclusion is embedded in our organisational values and reflected in our everyday behaviours. We will seek to assess, prevent, and remedy potential and/or actual negative diversity and inclusivity risks and impacts through the following:

- **Leading by example** - Provide inclusive leadership and lead by example by making decisions based on merit, and being responsible for diversity and inclusion in the workplace.
- **Training** - We prioritise the development of internal knowledge and capability, particularly among leaders and staff, to support an inclusive and equitable workplace culture by conducting annual diversity, equity, inclusivity and unconscious bias training.
- **Insight** - To inform our diversity and inclusion efforts, we are committed to collecting voluntary and anonymised data on gender identity and other selected social identities, where appropriate, across relevant people-related business processes. This enables disaggregated data analysis and supports transparent social reporting.
- **Privacy** - Comvita is committed to safeguarding the privacy of diversity, equity, and inclusion data by collecting it with informed consent, anonymising and securing sensitive information, and limiting access to only those who need analysis and reporting.
- **Stakeholder engagement** - Improvement activities are developed and implemented based on insights gained from data analysis and input from relevant stakeholders.
- **Clear Objectives** - The Comvita Board sets and reviews measurable diversity objectives each year. These objectives are designed to provide transparency around delivery against the intentions of this policy. Objectives are recommended to the Safety & Performance Committee each year by Management, for Board approval. The Committee annually reviews Comvita's progress towards achieving them.
- **Fair and equitable recruitment** - Comvita is committed to providing equal opportunities through fair, inclusive, and bias-free recruitment practices that attract and support diverse talent at all levels of the organisation, attracting, developing and retaining a diverse team that represents our consumers and global marketplaces.
- **Workplace equality** - Promote workplace equality, including equitable pay position across roles and career progression opportunities.
- **Action and remediation** - Preventing, identifying and addressing actual or potential negative impacts on diversity, equity, and inclusion within our operations and across our value chain.
- **Supporting policies** – Implementing appropriate supporting policies to ensure compliance with our commitments under this policy (refer to Related Policies below).
- **Reporting mechanism** - Operating a formal speak up (grievance) channel and process for staff to raise concerns.
- **Continuous improvement** – Regularly monitoring and evaluating the effectiveness of our diversity and

inclusivity strategies and activities against our objectives, identifying learnings and future improvements, and with the evaluation results shared with senior management and the Board.

ROLES AND RESPONSIBILITIES

Diversity, equity, inclusion and belonging are everyone's responsibility at Comvita. It requires intentional action every day.

Senior Leadership: The Senior Leadership Team is responsible for understanding and implementing these measures, creating conditions for inclusivity, and addressing any issues related to diversity and inclusion with support from the Head of People and Technology.

All Employees: Every Comvita employee is responsible for treating colleagues, customers, and the communities we engage with respectfully and inclusively. Employees are also expected to remain informed about barriers to workplace inclusivity by participating in regular training on unconscious bias and diversity and inclusion principles.

Employee Surveys: Employee perceptions and experiences of diversity and inclusion are measured regularly to understand, address, and enhance our employees' sense of belonging and psychological safety at Comvita.

REPORTING PROCEDURES AND NON-RETALIATION

All reports of bullying, harassment, or discrimination are taken seriously and are promptly investigated and addressed. Any concerns regarding a breach or potential breach of this policy, whether by an employee, customer, or community partner, should be raised in good faith in line with our Speak Up Policy.

Concerns can be reported to a People Leader, a member of the People and Purpose Team, a Senior Leadership Team member, the Head of People and Technology, or anonymously through the Speak Up Policy. Individuals who raise concerns are protected from retaliation, victimization, or discrimination. Any form of retaliation or unfair treatment against the complainant will result in disciplinary action. Likewise, if a false or malicious complaint is made, disciplinary action may be taken against the complainant.

COMMUNICATION

This policy is communicated to all interested parties as well as being made available to our wider community through publication on our external website and internal staff intranet.

This policy is applied to Comvita's policies and practices across operations, customers and community/society.

RELATED DOCUMENTS

Comvita Speak Up Policy

Comvita Code of Ethics

Comvita Bullying, Harassment and Discrimination Policy

Comvita Sustainable Procurement Policy

Comvita Supplier Code of Conduct

Comvita Recruitment and Selection Policy

Implementation and Review

This Policy was approved by the Board October 2025 and is reviewed every year. Implementation will be led by the Chief Executive Officer and the Head of People and Technology

Ultimately Comvita aspires to be recognized as a best employer globally and understands embracing diversity and inclusion contributes to achieving this. Through this policy, we reaffirm our commitment to creating an environment where everyone can thrive, contribute meaningfully, and feel a true sense of belonging.