

More than Meets the Eye



| DIVERSITY POLICY (NZ EDITION) | | |
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| Owner: | Issued: | |
| Review date: | Supersedes: | |



Objectives:

Millennium & Copthorne Hotels New Zealand (MCK) recognizes that people are our greatest asset and we are committed to cultivating an inclusive working environment that promotes healthy growth both personally and professionally, which benefits from the dynamics of our diverse workforce, as well as to the elimination of unlawful and unfair discrimination.

MCK does not discriminate because of age, disability, gender, marriage status, race, religion / belief or sexual orientation. It aims to foster and develop a culture that values merit, openness, fairness and transparency.

All employees are responsible for the promotion and advancement of this policy. Behaviour, actions or words that contravene the policy will not be tolerated and will be dealt with in line with MCK's Code of Conduct and disciplinary policy.

This policy applies to all employees and we encourage all of our customers, suppliers and contractors to do the same.

This policy will be regularly reviewed and updated to reflect changes in the law, demographics and business requirements. Progress against the policy will be reported annually to the senior management team who will then review MCK's diversity status.

This policy aims to equip the organisation with diversity principles which demonstrate our commitment, both internally and externally.

Guiding Principles:

- We actively encourage diversity and inclusion in the workplace, not just because it is best practice, but also because it makes good business sense.
- We seek to leverage the unique cultures of our global communities and develop a culture of inclusiveness.
- We create a working environment free of harassment, victimisation and unlawful discrimination, promoting dignity and respect for all employees where individual differences and their contributions are recognised and valued.
- We aim to achieve and maintain the highest levels of integrity, ethics, and service excellence at all times.
- These principles apply to our own staff, guests, suppliers and stakeholders and we aim to apply them in our local communities as well.

Our Framework for Embracing Diversity:

- a) Culture Building
 - MCK fosters and aims to maintain a culture of ownership and where trust forms the basic foundation of all actions.
 - We believe that our leaders across the business should be good role models for others, by demonstrating behaviours and actions that match our values, and by adhering to them throughout the business.
 - We believe that if we engage with our leaders to take good care of our employees, our employees in turn will be able to engage with and take good care of our guests.
 - We operate on a "24/7/365" basis in a highly competitive hospitality industry that requires our employees to demonstrate commitment to service excellence. We are most effective when we respect each other's importance and contributions.

- Our employees are entrusted to perform their work to the best of their abilities and to meet the needs
 of our customers and of MCK. Every employee is accountable for his/her own performance, and
 where working together effectively creates a great place to work environment.
- We believe in increasing awareness and personal knowledge for self-improvement which will improve capabilities and organisational effectiveness, adding value to the business.
- We recognise that a lifestyle-friendly and adaptable process approaches at work supports the lives of the family.
- b) Talent Recruitment & Selection Process
 - All positions at Millennium Hotels & Resorts are to be filled on the basis of merit and qualifications.
 - We recognise the importance of having a diverse workforce and thus encouraging people from all backgrounds to apply to work with us.
 - Employees who are involved in the talent acquisition and selection process are trained in assessing applicants as an EEO employer.
- c) Learning & Development
 - Millennium Hotels & Resorts seeks to develop our employees and to hone their technical, management and leadership skills.
 - Opportunities for further development will be offered based on job requirements and business needs.
 - Management staff receive training around Diversity and EEO awareness .
- d) Succession Planning
 - In order to ensure the continuity in business excellence, Millennium Hotels & Resorts needs to ensure development programmes relating to career advancement are in place.
 - We will work with high potential employees in crafting development programmes in addressing their competency gaps to embark on a senior role in the future.

Leadership

The company will:

- identify "Diversity Champions" across the organization who will promote the diversity strategy;
- secure Board and Senior Management ownership, sponsorship and budget for the programme; and
- develop and circulate to all staff MCK's diversity vision statement.

Review

MCK will:

- undertake periodic reviews of its policies and procedures and on the policy deliverables;
- compare diversity metrics from other organisations and compare them with sector and best practice guidelines; and
- produce a diversity analysis report for MCK's Board and Senior Management annually.

Communication and consultation

MCK will:

• ensure that mainstream business communications reinforce the inclusive messages and become mainstreamed into day-to-day processes.

Measurement

The company will:

- review and adopt appropriate metrics to benchmark against similar companies, demographics and best practice standards;
- set and then review measurable diversity targets within the workforce these targets shall initially be set over a five-year period and be approved by the Board and Managing Director;
- establish formal measurement tools to assess the climate in the organisation (for example staff surveys, 360° feedback and diversity audits);

External profile

The company will:

- join appropriate organisations in order to exchange best practice on corporate diversity and metrics;
- build relationships with similar companies trade to enhance its corporate reputation and position the
 organisation at the leading edge of diversity in the workplace;
- develop relationships outside the business in order to enhance and further develop diversity principles herein;

Reinforcing Our Actions through Policies:

We will continue to work in embracing diversity through the implementation of policies & procedures, initiatives, practices which include the following:

- a) Code of Conduct
- b) Equal Employment Opportunity
- c) Code of Business Conducts and Ethics
- d) Whistle Blowing Policy.

Approved by the Board of Directors of Millennium & Copthorne Hotels New Zealand Limited on 26 July 2018