



Diversity Policy

Introduction

Starpharma Holdings Limited (**Starpharma** or **Company**) has adopted the following values which drive its culture:

- Teamwork
- Superior Performance
- Innovation
- Integrity
- Accountability

Starpharma is committed to workplace diversity at all levels and recognises the value of a diverse workforce, particularly in achieving superior performance and innovation.

Starpharma recognises the corporate benefits of diversity of its workforce and Board, and realises the importance of being able to attract, retain and motivate employees from the widest possible pool of available talent. This includes inclusion at all levels of Starpharma, regardless of gender, family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, cultural background and socio-economic background. Starpharma is committed to equality, to treating all individuals with respect, and to fostering an inclusive workplace where discrimination, harassment, vilification and victimisation is not tolerated.

As a company that is listed on the Australian Securities Exchange (ASX), Starpharma aims to comply with both the requirements and spirit of all ASX Corporate Governance Council's *Corporate Governance Principles and Recommendations*, including those relating to diversity.

This Policy was last reviewed and approved by the Board on 23 March 2023.

Responsibility

The Board of Directors of the Company (**Board**) has adopted this Starpharma Diversity Policy (**Policy**).

This Policy requires the Board to establish measurable objectives for achieving gender diversity at Board, senior executive and across the entire workforce, and to assess annually both Starpharma's diversity-related objectives and its progress in achieving them.

Whilst the requirements of the ASX Corporate Governance Council's Principles & Recommendations on diversity focus on gender diversity, the Board recognises the importance of broader diversity and seeks to reflect this broader view in the Company's diversity objectives and reporting.

Framework & Focus

The Board values the level of diversity already present within the organisation and believes that continuing to promote diversity is in the best interests of the Company, its employees and its shareholders. Starpharma has adopted a Code of Conduct Policy (**Code**) which reflects the core values of the Company and sets out standards of behaviour in matters including equal employment opportunity and best practice in recruitment, employment conditions, performance review and development. This Policy is intended to operate alongside that Code, providing a framework for Starpharma to achieve a number of diversity objectives.

Objectives

At the time of reviewing this Policy there is a reasonable gender balance across the Company. The focus of Starpharma's diversity objectives therefore remains on supporting the career development of women rather than increasing their representation, and on fostering a broader view of diversity which includes generational and cultural diversity as well as gender.

Emphasis will continue to be directed towards improving the representation of women in leadership roles. Diversity-related objectives and initiatives may include, but not be limited to:

- Continuing to promote a corporate culture that embraces and celebrates diversity and inclusion within the Company and more widely within the biotech sector;
- Providing career and relevant professional development opportunities for women at the middle management, senior management and director levels;
- Encouraging and providing networking and role model opportunities for women;
- Supporting a smooth transition for employees before, during and after parental leave;
- Considering flexible work practices for employees with caring responsibilities, where possible;
- Ensuring no significant gender-based remuneration difference for individuals in similar roles;
- Creating awareness of unconscious bias; and
- Continuing to celebrate the broader diversity of Starpharma's workforce and reflecting this within its diversity reporting.

Diversity objectives are published annually in the Company's Corporate Governance Report within the Annual Report as well as within the Corporate Governance Statement.

Board Composition

The Starpharma Board Charter requires the Company to seek to maintain a mix of directors on the Board from different backgrounds with complementary skills and experience. Gender diversity is a relevant consideration in Board composition.

The measurable objective for maintaining gender diversity in the composition of the Board is to have not less than 30% of directors of each gender.

Reporting

Management will monitor, review and report to the Remuneration & Nomination Committee and/or the Board as appropriate on the Company's progress towards achieving its diversity-related measurable objectives on an annual basis.

In its annual report, the Company will disclose:

- a) the measurable objectives set by the Board in accordance with the Policy;
- b) progress against these objectives; and
- c) the proportions of women and men in the whole organisation, in senior executive positions and on the Board.

The Company will also disclose in its annual report a summary of the compliance of the Company with any other diversity objectives set by the Board from time to time.

Review

This Policy will be reviewed periodically to ensure it continues to comply with the law and remains relevant and effective.

This Policy does not form part of an employee's contract of employment with Starpharma, nor give rise to contractual obligations. However, to the extent that the Policy requires an employee to do or refrain from doing something and at all times subject to legal obligations, this Policy sets out a direction for Starpharma with which all employees are expected to comply.

This Policy does not impose on Starpharma, its directors, officers, agents or employees any obligation to engage in, or justification for engaging in, any conduct which is illegal or contrary to any anti-discrimination or equal employment opportunity legislation or laws in any State or Territory of Australia or of any foreign jurisdiction.