

DIVERSITY POLICY

1. Introduction

1.1 This Policy is designed to achieve diversity in all its manifestations in the workplace.

1.2 This Policy is intended to operate across the entirety of the Magnis Group (which comprises Magnis Energy Technologies Ltd and its related bodies corporate, including its wholly-owned subsidiaries in Tanzania, and its subsidiary based in New York, USA). In the circumstances where local traditions or local laws impact on the safety or human rights of employees (where used in this policy this term includes directors of Magnis Group where appropriate) with respect to their diversity, it is expected that employees of the relevant subsidiary company will act in accordance with the Magnis values, its Code of Business Conduct & Ethics, Whistleblower Policy and this Policy (subject to ensuring that in doing so, employees do not breach any applicable local laws).

2. Commitment

2.1 The Magnis Group is committed to achieving the goals of:

- (i) providing equal access to opportunities in the workplace based on merit; and
- (ii) fostering a corporate culture and values that embraces inclusiveness and people from diverse backgrounds.

2.2 The Magnis Group will:

- (i) not tolerate any form of unlawful discrimination or harassment, bullying or victimisation in the workplace;
 - (ii) aim to attract and retain a workforce whose composition reflects a diversity of backgrounds, experience and perspectives;
 - (iii) aim to make fair and merit-based decisions in the context of decisions relating to recruitment, evaluation of performance, access to learning and development opportunities, talent identification, succession planning and career progression;
 - (iv) encourage employees to seek out and learn from the experiences of each other, customers and stakeholders; to build understanding; to be fair and inclusive in decision-
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making and to continuously improve;

(v) seek to engage in transparency in all forms of reporting and disclosure of information;
and

(vi) engage in flexible work practices to improve business outcomes and employee wellbeing as tools to facilitate improved productivity and performance.

2.2 This Policy applies to all employees of the Magnis group.

3. Benefits of diversity

3.1 All Board's of the Magnis Group believe that there are corporate performance benefits that all forms of workplace diversity can bring to the Company not only to decision-making within Magnis Group's operations, but to Magnis Group's overall performance and the well-being of its staff. Decision-making can be enhanced by having a diversity of decision-makers who bring a range of viewpoints, skills and experiences to the process.

3.2 Workplace diversity encompasses the variety of differences between people in an organisation, including, but not limited to, gender, race, ethnicity, age, disability and cultural background.

3.3 the Magnis Group believes that embracing diversity and inclusiveness in its workplace contributes to the achievement of its corporate objectives and helps to enhance its reputation. It is expected that all people on the Magnis Group will work co-operatively together to achieve a corporate culture that supports this commitment.

3.4 Failure to maintain a diverse and inclusive workplace may result in harm being suffered by individuals, adverse reputational impacts, regulatory action and potential legal liability for the Magnis Group.

3.5 Respecting diversity assists the Magnis Group to:

(i) recruit and retain the right people from a diverse pool of talented candidates;

(ii) make informed and innovative decisions, drawing on a wider range of ideas, experiences and perspectives that employees from diverse backgrounds, and with differing skill sets, bring to their individual roles;

(iii) better represent the diversity of the Magnis Group's stakeholders; and

- (iv) recognise this is of particular relevance in the context of responding to the best cultural, remuneration, and governance outcomes as well as in the context of meeting the challenges and uncertainty of a continually changing business and governance landscape eg in the context of managing through the COVID-19 global pandemic and the recovery that can be planned for in its aftermath.

4. Responsibilities

- 4.1 Each Company in the Magnis Group shall ensure that each employee is aware, appropriately trained and is individually responsible for supporting the Magnis Group's corporate culture of diversity and inclusiveness and its commitment in the workplace to equal opportunities based on merit
- 4.2 The Magnis Group and its various boards note that Magnis is not, as at the date of this Policy, within the S&P/ASX 300. The Board also notes that the Workplace Gender Equality Act, 2012 (Commonwealth) does not apply to the Company because it does not presently meet the threshold number of 100 employees in Australia. The Board therefore cannot commit the Company, at the present stage of its corporate development, to setting a measurable objective or target of achieving gender diversity in the composition of its Board of not less than 50% of its directors being of each gender within, say, the next 5 years. The Board, remains, however, open to seeking the achievement of such an objective at an aspirational level, going forward.
- 4.3 The Board believes that this Policy needs to work in conjunction with its Code of Business Conduct & Ethics. The Board is cognisant that the establishment and maintenance of a culture of inclusion will not be realised without the setting of appropriate and meaningful benchmarks that can be periodically monitored and measured as well as the setting of key performance indicators.
- 4.4 The Board accepts that a tenet of this Policy is that the Nominations & Remuneration Committee shall, in a broad sense, automatically integrate diversity into the Board recruitment process and shall not use any unconscious biases eg bias against female candidates and/or culturally diverse candidates.

5. Breach of Policy

- 5.1 Breach of this Policy may be regarded as misconduct which may lead to
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disciplinary action (including, but not limited to, in respect of an employee, termination of employment, and in respect of a director, termination of appointment).

6. Adoption of Policy

6.1 This Policy was approved and adopted by the Board in September 2022.

6.2 A copy of this Policy is to be published on the Company's website.
