



Equal Employment Opportunity and Diversity Policy

Atlas Iron Limited

1 PURPOSE & SCOPE

Atlas Iron Limited (**Atlas**) values diversity in all aspects of its business and is committed to creating a working environment that recognises and utilises the contribution of all of its employees. Atlas recognises that diversity in its business enhances productivity, retention, creativeness and balance, provides a more dynamic and enjoyable work environment, and will often create new opportunities for Atlas, each of which which in turn helps create sustainable shareholder value.

Atlas' view of diversity incorporates a number of different factors, including gender, marital or family status, sexual orientation, age, race, cultural background and ethnicity, religious or political affiliations or opinions, family responsibilities and disability.

The purpose of this Equal Employment and Opportunity and Diversity Policy (**Policy**) is to set out the commitment by the Company to actively seek to maintain a diverse workforce to create a workplace that is fair and inclusive, applies fair and equitable employment practices and provides a working environment that will allow all employees to reach their full potential.

This Policy applies to all Atlas directors, employees, contractors and stakeholders. Each person has an obligation to support and respect equality, workplace diversity and ethical practices in their workplace.

2 ACCOUNTABILITY AND RESPONSIBILITY

The Atlas Board, assisted by Management, is responsible for devising and implementing strategies and initiatives to ensure that this Policy is operated in a successful manner.

While diversity includes all of the matters outlined above, both the Atlas Board and the ASX Corporate Governance Council identify gender as a key area of focus. Accordingly, gender diversity is monitored at all levels of the organisation and measurable objectives are set for promoting gender diversity within Atlas.

The Atlas Board will review and report on an annual basis the measurable objectives for promoting gender diversity within Atlas and the progress towards the achievement of those objectives. These details will be set out in Atlas' Annual Reports.

The Atlas Board will also conduct an annual review of, and disclose in Atlas' Annual Reports, the respective proportions of men and women on the Board and in the executive leadership team and senior leadership team and across the whole organisation.

3 HOW ATLAS SUPPORTS EQUAL EMPLOYMENT OPPORTUNITY AND DIVERSITY

Atlas is committed to, and will actively ensure, equal employment opportunity and diversity across its organisation.

To support equal employment opportunity and diversity in the recruitment of all employees including senior management and the Board:

- employee and director selection will be made from a diverse pool of qualified candidates; and
- Atlas will seek to ensure that its recruitment and selection practices at all levels (from the Board downwards) are appropriately structured so that a diverse range of candidates are considered and that no conscious or unconscious biases are applied that might discriminate against certain candidates. In addition, Atlas seeks to ensure

that all matters related to employment and career development will be free from discriminatory practices by ensuring that selection for jobs and career progression will be determined by personal merit, competency, qualifications and ability to effectively perform the role.

Atlas seeks to ensure pay equity across roles and grades of employees taking into account individual performance, experience, location of role and job nature. Atlas further recognises that employees (female and male) at all levels may have domestic responsibilities and will seek to adopt, where possible, flexible work practices that will assist them to meet these responsibilities.

Atlas recognises that in order to have a properly functioning diverse workplace, discrimination, harassment, vilification and victimisation cannot and will not be tolerated. The Board will further seek to identify and implement programs that will assist in the development of a broader and more diverse pool of skilled and experienced employees and that, over time, will prepare them for senior management and Board positions.

4 POLICY REVIEW

The Equal Opportunity and Diversity Policy will be reviewed annually by the Corporate Governance Committee to ensure:

- it remains consistent with the Board's commitment towards seeking to maintain a diverse workforce which is free from discriminatory practices; and
- the Policy is updated as required.

The Corporate Governance Committee must obtain approval from the Board for any recommended changes to the Policy.

5 WHO TO CONTACT

If you have any questions, concerns or feedback about this Policy please contact the General Counsel & Company Secretary or the General Manager – Human Resources at:

Atlas Iron Limited

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Perth WA 6000

Phone: 08 6228 8000

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