



## 2021 - 22 Compliance Program

Submitted by:

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Date: 2022-06-01

# #Workplace overview

## Policies and strategies

1: Do you have a formal policy and/or formal strategy in place that specifically supports gender equality in the following areas?

...Recruitment	Yes( <i>Select all that apply</i> )
...Yes	Policy Strategy
...Retention	Yes( <i>Select all that apply</i> )
...Yes	Strategy
...Performance management processes	Yes( <i>Select all that apply</i> )
...Yes	Policy Strategy
...Promotions	Yes( <i>Select all that apply</i> )
...Yes	Policy Strategy
...Talent identification/identification of high potentials	Yes( <i>Select all that apply</i> )
...Yes	Strategy
...Succession planning	Yes( <i>Select all that apply</i> )
...Yes	Strategy
...Training and development	Yes( <i>Select all that apply</i> )
...Yes	Policy Strategy
...Key performance indicators for managers relating to gender equality	Yes( <i>Select all that apply</i> )
...Yes	Strategy

2: Do you have formal policy and/or formal strategy in place that support gender equality overall?

Yes(*Select all that apply*)

...Yes	Policy Strategy
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3: Does your organisation have any of the following targets to address gender equality in your workplace?

- Increase the number of women in leadership positions
- Increase the number of women in male-dominated roles

4: If your organisation would like to provide additional information relating to your gender equality policies and strategies, please do so below.

OFX has a Family and Domestic Violence Leave policy, applicable to all OFX employees, regardless of gender or orientation, to support employees if they or someone in their family is experiencing family and domestic violence.

## Governing bodies

### *Ozforex Limited*

1: Does this organisation have a governing body?	Yes( <i>Provide further details on the governing body(ies) and its composition</i> )
1.1: What is the name of your governing body?	OFX Group Limited Board of Directors
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female	0
...Male	1
...Non-binary	0
...Members	
...Female	2
...Male	3
...Non-binary	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes( <i>Select all that apply</i> )
	Policy Strategy
1.5: Has a target been set to increase the representation of women on this governing body?	Yes( <i>Provide further details on your target</i> )
10.6: What is the percentage (%) target?	40.00%
10.7: What year is the target to be reached (select the last day of the target year)?	31-Mar-2024
1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body?	Yes( <i>Select all that apply.</i> )
	Policy Strategy
1.1.a.3: How many members are on the governing body and who holds the predominant Chair position?	

### *OFX Group Limited*

1: Does this organisation have a governing body?	Yes( <i>Provide further details on the governing body(ies) and its composition</i> )
1.1: What is the name of your governing body?	OFX Group Limited Board of Directors
1.2: What type of governing body does this organisation have?	Board of directors
1.3: How many members are on the governing body and who holds the predominant Chair position?	
...Chairs	
...Female	0
...Male	1
...Non-binary	0
...Members	
...Female	2
...Male	3
...Non-binary	0
1.4: Do you have a formal selection policy and/or formal selection strategy for this organisation's governing body members?	Yes( <i>Select all that apply</i> )
	Policy Strategy
1.5: Has a target been set to increase the representation of women on this governing body?	Yes( <i>Provide further details on your target</i> )
10.6: What is the percentage (%) target?	40.00%
10.7: What year is the target to be reached (select the last day of the target year)?	31-Mar-2024
1.6: Do you have a formal policy and/or formal strategy in place on the gender composition of your governing body?	Yes( <i>Select all that apply.</i> )
	Policy Strategy
1.1.a.3: How many members are on the governing body and who holds the predominant Chair position?	

2: If your organisation would like to provide additional information relating to governing bodies and gender equality in your workplace, do so below.

# #Action on gender equality

## Gender pay gaps

1: Do you have a formal policy and/or formal strategy on remuneration generally?

Yes(*Select all that apply*)

...Yes

Policy  
Strategy

1.1: Are specific pay equity objectives included in your formal policy and/or formal strategy?

Yes(*Select all that apply*)

...Yes

To ensure no gender bias occurs at any point in the remuneration review process (for example at commencement, at annual salary reviews, out-of-cycle pay reviews, and performance reviews)  
To implement and/or maintain a transparent and rigorous performance assessment process  
Other (provide details)

...Other (provide details)

Whilst specific pay equity objectives have not been set, it remains a priority for the organisation to improve pay equity outcomes both on a like-for-like and an overall basis.

2: What was the snapshot date used for your Workplace Profile?

31-Mar-2022

3: Does your organisation publish its organisation-wide gender pay gap?

Yes(*Select all that apply.*)

...Yes

Shared internally with governing body members  
Shared internally with employees  
Shared internally with shareholders  
Shared externally

4: Do you give WGEA permission to publicly publish your organisation-wide gender pay gap?

No

5: If your organisation would like to provide additional information relating to gender pay gaps in your workplace, please do so below.

## Employer action on pay equity

1: Have you analysed your payroll to determine if there are any remuneration gaps between women and men (e.g. conducted a gender pay gap analysis)?

Yes(*Provide further details on the most recent gender remuneration gap analysis that was undertaken.*)

1.1: When was the most recent gender remuneration gap analysis undertaken?	Within the last 12 months
1.2: Did you take any actions as a result of your gender remuneration gap analysis?	Yes( <i>Select all that apply</i> )
1.2: Did you take any actions as a result of your gender remuneration gap analysis?	<p>Identified cause/s of the gaps</p> <p>Reviewed remuneration decision-making processes</p> <p>Analysed performance pay to ensure there is no gender bias (including unconscious bias)</p> <p>Analysed performance ratings to ensure there is no gender bias (including unconscious bias)</p> <p>Reported pay equity metrics (including gender pay gaps) to the governing body</p> <p>Reported pay equity metrics (including gender pay gaps) to the executive</p> <p>Reported pay equity metrics (including gender pay gaps) externally</p> <p>Trained people-managers in addressing gender bias (including unconscious bias)</p> <p>Corrected like-for-like gaps</p>
.. Yes	
1.3: You may provide details below on the type of gender remuneration gap analysis that has been undertaken (for example like-for-like and/or organisation-wide)	<p>Every year we undertake a pay equity analysis to review the pay levels of women and men in the company. With access to global remuneration benchmarking data, we have been able to undertake an analysis of the pay competitiveness of male and female employees relative to the market median base salary for their roles. Following the FY22 remuneration review, this analysis showed that:</p> <ul style="list-style-type: none"> <li>• On an average basis, men’s positioning against the market median is 99.25% vs women’s positioning against the market median which is 99.93%; and</li> <li>• On a median basis, men’s positioning against the market median is 98.31% vs women’s positioning against the market median which is 99.31%.</li> </ul> <p>This indicates pay equity on a like-for-like basis within OFX.</p>

2: For organisations with partnership structures: Have you undertaken a gender remuneration gap analysis (‘gender pay gap analysis’) in the current reporting period to determine if there are any remuneration gaps between women partners and men partners in your organisation?

3: If your organisation would like to provide additional information relating to employer action on pay equity in your workplace, please do so below.

### Employee consultation

1: Have you consulted with employees on issues concerning gender equality in your workplace during the reporting period?

Yes(*Provide further details on the employee consultation process.*)

1.1: How did you consult employees?	Survey Exit interviews Other (provide details)
...Other (provide details)	Consult on gender equality issues via feedback from P&C Business Partners who conduct regular check-ins with employees, as well as directly via our parental leave support program
1.2: Who did you consult?	ALL staff Human resources managers Other (provide details)
...Other (provide details)	Consult both women and men via annual employee survey, exit interviews and parental leave support program

2: Do you have a formal policy and/or formal strategy in place on consulting employees about gender equality?

Yes(*Select all that apply.*)

...Yes	Strategy
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3: On what date did your organisation share your previous year's public reports with employees?

8-Jul-2021

4: Does your organisation have shareholders?

Yes

4.1: On what date did your organisation share your previous year's public reports with shareholders?	7-Jul-2021
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5: Have you shared previous Executive Summary and Benchmark reports with the governing body?

Yes

6: If your organisation would like to provide additional information relating to employee consultation on gender equality in your workplace, please do so below.

# #Flexible work

## Flexible working

1: Do you have a formal policy and/or formal strategy on flexible working arrangements?

Yes (*Select all that apply*)

...Yes	Policy Strategy
...A business case for flexibility has been established and endorsed at the leadership level	Yes
...Leaders are visible role models of flexible working	Yes
...Flexible working is promoted throughout the organisation	Yes
...Targets have been set for engagement in flexible work	No ( <i>Select all that apply</i> )
...No	Other (provide details)
...Other (provide details)	All employees have access to flexibility under our hybrid work model (combination of in office and working remotely for all roles) and therefore targets are not required.
...Targets have been set for men's engagement in flexible work	No ( <i>Select all that apply</i> )
...No	Other (provide details)
...Other (provide details)	All employees have access to flexibility under our hybrid work model (combination of in office and working remotely for all roles) and therefore targets are not required
...Leaders are held accountable for improving workplace flexibility	Yes
...Manager training on flexible working is provided throughout the organisation	Yes
...Employee training is provided throughout the organisation	Yes
...Team-based training is provided throughout the organisation	Yes
...Employees are surveyed on whether they have sufficient flexibility	Yes
...The organisation's approach to flexibility is integrated into client conversations	Yes

...The impact of flexibility is evaluated (e.g. reduced absenteeism, increased employee engagement)	Yes
...Metrics on the use of, and/or the impact of, flexibility measures are reported to key management personnel	Yes
...Metrics on the use of, and/or the impact of, flexibility measures are reported to the governing body	Yes

2: Do you offer any of the following flexible working options to MANAGERS in your workplace?

...Flexible hours of work	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available Informal options are available
...Compressed working weeks	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available Informal options are available
...Time-in-lieu	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available Informal options are available
...Telecommuting (e.g. working from home)	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available Informal options are available
...Part-time work	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available
...Job sharing	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available
...Carer's leave	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available
	No( <i>You may specify why the above option is not</i>

...Purchased leave	<i>available to your employees.)</i>
...No	Not a priority
...Unpaid leave	Yes( <i>Select one option only</i> )
...Yes	SAME options for women and men( <i>Select all that apply</i> )
...SAME options for women and men	Formal options are available Informal options are available

3: Are your flexible working arrangement options for NON-MANAGERS the same as the options for managers above?

Yes

4: Has your organisation implemented an 'all roles flex' approach to flexible work?

Yes

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce during the 2021-22 reporting period?

Yes, for both women and men

6: If your workplace includes hybrid teams (i.e. some employees in a team work remotely while other employees in a team work at the organisation's usual workplace), have any of the following measures been utilised to ensure the fair treatment of all employees regardless of work location?

Training for managers on how to work with flexible and remote/hybrid teams  
 Training for non-managers on how to work with flexible and remote/hybrid teams  
 Training for all employees on how to work with flexible and remote/hybrid teams  
 Employee performance is measured by performance and not presenteeism  
 All team meetings are held online

7: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, including specific changes due to the impact of the COVID-19 pandemic on your workplace, please do so below.

OFX has embedded a hybrid model of work across the organisation, which for most of our employees means a combination of working from home and in the office. The need to come into the office is determined by the nature of the work, the way teams organise to be most effective and the needs of the customers (internal and external) they support. In this way, working arrangements will look different across teams and even within teams.

- Leaders are empowered to discuss and plan with their teams the best working arrangements that meet the three-way test, and that this will look different for every team, within teams and regions.
- This is not a set and forget arrangement, we've taken an 'always keep learning' approach and constantly check in and revise where necessary
- People Leaders and team members have been equipped with the tools they need to enable successful hybrid working arrangements.

# #Employee support

## Paid parental leave

1: Do you provide employer funded paid parental leave regardless of carer's status (i.e. primary/secondary) in addition to any government funded parental leave scheme?

Yes, we offer employer funded parental leave (using the primary/secondary carer definition)

1.1: Do you provide employer funded paid parental leave for primary carers in addition to any government funded parental leave scheme?	Yes( <i>Please indicate how employer funded paid parental leave is provided to the primary carers.</i> )
1.1.a: Please indicate whether your employer-funded paid parental leave for primary carers is available to:	All, regardless of gender
1.1.b: Please indicate whether your employer-funded paid parental leave for primary carers covers:	Birth Adoption Surrogacy Stillbirth
1.1.c: How do you pay employer funded paid parental leave to primary carers?	Paying the employee's full salary
1.1.d: Do you pay superannuation contribution to your primary carers while they are on parental leave?	Yes, on employer funded parental leave
1.1.e: How many weeks (minimum) of employer funded paid parental leave for primary carers is provided?	12
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	81-90%
1.1.g: Do you require primary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave?	Yes
1.1.g.1: How long is the qualifying period?	12
1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Yes
1.1.h: Do you require primary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Within 12 months

.. Yes	
1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(Please indicate how employer funded paid parental leave is provided to the secondary carers.)
1.2.a: Please indicate whether your employer-funded paid parental leave for secondary carers is available to:	All, regardless of gender
1.2.b: Please indicate whether your employer-funded paid parental leave for secondary carers covers:	Birth Adoption Surrogacy Stillbirth
1.2.c: How do you pay employer funded paid parental leave to secondary carers?	Paying the employee's full salary
1.2.d: Do you pay superannuation contribution to your secondary carers while they are on parental leave?	Yes, on employer funded parental leave
1.2.e: How many weeks (minimum) of employer funded paid parental leave for secondary carers is provided?	2
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	80-90%
1.2.g: Do you require secondary carers to work for the organisation for a certain amount of time (a qualifying period) before they can access employer funded parental leave?	Yes
1.2.g.1: How long is the qualifying period?	12
1.2.h: Do you require secondary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Yes
1.2.h: Do you require secondary carers to take employer funded paid parental leave within a certain time period after the birth, adoption, surrogacy and/or stillbirth?	Within 12 months
.. Yes	

2: If your organisation would like to provide additional information relating to paid parental leave and gender equality in your workplace, please do so below.

OFX have undertaken a review of its current company paid parental leave entitlements and are planning to implement a new global parental leave policy in May 2022 for all permanent employees that includes:

- Equal paid parental leave for both men and women; removing the distinction between primary and secondary carers
- Duration of company paid parental of 16 weeks
- Flexible in application of paid leave. i.e. a block of 16 weeks; 2 weeks at a time etc
- Available to both full and part time permanent employees regardless of their length of service
- The leave to be taken in the first year of birth or placement of a child

## Support for carers

1: Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?

Yes (*Select all that apply*)

...Yes

Policy

2: Do you offer any of the following support mechanisms for employees with family or caring responsibilities?

...Employer subsidised childcare

No (*You may specify why the above support mechanism is not available to your employees.*)

...No

Not a priority

...On-site childcare

No (*You may specify why the above support mechanism is not available to your employees.*)

...No

Not a priority

...Breastfeeding facilities

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at ALL worksites

...Childcare referral services

No (*You may specify why the above support mechanism is not available to your employees.*)

...No

Not a priority

...Internal support networks for parents

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at ALL worksites

...Return to work bonus (only select if this bonus is not the balance of paid parental leave)

No (*You may specify why the above support mechanism is not available to your employees.*)

...No

Not a priority

...Information packs for new parents and/or those with elder care responsibilities

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at ALL worksites

...Referral services to support employees with family and/or caring responsibilities

Yes (*Please indicate the availability of this support mechanism.*)

...Yes

Available at ALL worksites

...Targeted communication mechanisms (e.g. intranet/forums)	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Support in securing school holiday care	No(You may specify why the above support mechanism is not available to your employees.)
...No	Not a priority
...Coaching for employees on returning to work from paid parental leave	Yes(Please indicate the availability of this support mechanism.)
...Yes	Available at ALL worksites
...Parenting workshops targeting mothers	No(You may specify why the above support mechanism is not available to your employees.)
...No	Not a priority
...Parenting workshops targeting fathers	No(You may specify why the above support mechanism is not available to your employees.)
...No	Not a priority
...Other (provide details)	No

3: If your organisation would like to provide additional information relating to support for carers in your workplace, please do so below.

OFX has created a parental leave engagement framework to enhance the experience of our employees taking parental leave by creating a more consistent approach to engaging with managers and employees before, during and after return from parental leave.

The engagement framework has been built with the following three goals in mind:

- Enhance employee support:
  - Regular meetings with employees before, during and after their parental leave with both HR business partners and managers
  - Provide parental support: providing mentors to support the parental leave experience and beyond
- Develop Manager capability and support:
  - HR business partners have regular meetings with managers of employees during the parental leave cycle, providing best practice advice and guidance on how to support their employees
- Keeping in touch:
  - Provide opportunities for employees to 'keep in touch' not only their managers but the business stakeholders, provide networking opportunities and opportunity to hear from employees who can provide advice on their experience.

The aim of the framework is to ensure we retain our talent who take parental leave as well as maintain a gender-diverse leadership pipeline.

1: Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

Yes(Select all that apply)	
...Yes	Policy Strategy
1.1: Do you provide a grievance process in any sex-based harassment and discrimination prevention formal policy and/or formal strategy?	Yes

2: Do you provide training on sex-based harassment and discrimination prevention to the following groups?

...All managers	Yes(Please indicate how often is this training provided (select all that apply):)
...Yes	At induction At least annually
...All employees	Yes(Please indicate how often is this training provided (select all that apply):)
...Yes	At induction At least annually

3: If your organisation would like to provide additional information relating to sex-based harassment and discrimination, please do so below.

OFX has an externally managed Whistleblower platform where employees can raise any concerns they have around any form of discrimination, harassment and bullying including gender-based discrimination, harassment and bullying. This platform allows the employee to raise their concerns anonymously if they chose to do so.

## Family or domestic violence

1: Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

Yes(Select all that apply)	
...Yes	Policy Strategy

2: Other than a formal policy and/or formal strategy, do you have the following support mechanisms in place to support employees who are experiencing family or domestic violence?

...Employee assistance program (including access to psychologist, chaplain or counsellor)	Yes
...Training of key personnel	No(Select all that apply)
...No	Not a priority
...A domestic violence clause is in an enterprise agreement or workplace agreement	No(Select all that apply)
...No	Other (provide details)

...Other (provide details)	Access to leave made available under the Family and Domestic Violence Leave (F&DV) policy
...Workplace safety planning	Yes
...Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	No( <i>Select all that apply</i> )
...No	Other (provide details)
...Other (provide details)	Access to domestic and violence leave made available under the Family and Domestic Violence (F&DV) policy
...Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	No( <i>Select all that apply</i> )
...No	Other (provide details)
...Other (provide details)	Access to domestic and violence leave made available under the Family and Domestic Violence (F&DV) policy
...Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	Yes( <i>Is the leave period unlimited?</i> )
...Yes	No
: How many days of paid domestic violence leave (not contained in an enterprise/workplace agreement) are provided?	10
...Access to unpaid leave	Yes( <i>Is the leave period unlimited?</i> )
...Yes	No
: How many days of unpaid domestic violence leave are provided?	10
...Confidentiality of matters disclosed	Yes
...Referral of employees to appropriate domestic violence support services for expert advice	Yes
...Protection from any adverse action or discrimination based on the disclosure of domestic violence	Yes
...Flexible working arrangements	Yes
...Provision of financial support (e.g. advance bonus payment or advanced pay)	Yes
...Offer change of office location	No( <i>Select all that apply</i> )
...No	Other (provide details)
...Other (provide details)	Only one office location in Australia
...Emergency accommodation assistance	No( <i>Select all that apply</i> )

...No	Not a priority
...Access to medical services (e.g. doctor or nurse)	No( <i>Select all that apply</i> )
...No	Not a priority
...Other (provide details)	No

3: If your organisation would like to provide additional information relating to family and domestic violence affecting your workplace, please do so below.

As per the OFX Group Family and Domestic Violence (F&DV) policy all permanent and fixed term employees who are personally experiencing family and domestic violence are entitled to 10 days paid leave per year. Permanent and fixed term employees who are supporting an immediate family or household member who is experiencing family or domestic violence is entitled to 5 days leave per year.

Any further leave, e.g. unpaid leave will be determined on a case by case basis.

# #Diversity and inclusion

## Voluntary section

1: Do you have a formal policy and/or formal strategy on diversity and inclusion in your organisation?

Yes (*Select all that is covered.*)

...Yes

Cultural and/or language and/or race/ethnicity background  
Disability and/or accessibility  
Sexual orientation  
Gender identity  
Age  
Other (*Provide details*)

...Other

marital or family status, socio-economic background, religious belief

2: Do you collect data on whether employees identify as Aboriginal and/or Torres Strait Islander?

Yes

...If this data can be shared and is not confidential, please complete the below table:

3: Do you currently collect data on any of the following dimensions of employees' identities?

Cultural and/or language and/or race/ethnicity background  
Disability  
Sexual orientation  
Gender identity  
Other

...Other

Age, carer responsibilities