

## DIVERSITY POLICY

### BrainChip Holdings Ltd ("Company")

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#### 1. SCOPE

This diversity policy applies to the Company's board of directors (**Board**), the senior executives, officers and employees of the Company and its subsidiaries and individuals who are authorised representatives, contractors and consultants engaged exclusively by the Company or any of its subsidiaries to provide services and act on its behalf (together, referred to as **Personnel**).

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#### 2. PURPOSE

The Company is committed to the right to diversity, equality, respect and inclusion and recognises the value of attracting and retaining Personnel with diverse backgrounds, knowledge, life and work experiences and abilities.

The Company strives to:

- 2.1 attract the best talent possible;
  - 2.2 ensure that our policies, practices and behaviours promote diversity and equal opportunity and foster an environment of mutual learning, respect and appreciation of differences, and
  - 2.3 ensure that all Personnel have the opportunity to realize their potential and contribute to the Company's success.
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#### 3. WHAT IS DIVERSITY?

The Company recognises that diversity not only encompasses gender identity but extends to age, race, ethnicity, religious and cultural background, language, relationship status, and disability. At the Company, diversity means:

- 3.1 an inclusive workplace that embraces individual differences;
  - 3.2 a workplace that is free from discriminatory behaviours and business practices including discrimination, harassment, bullying, victimisation and vilification;
  - 3.3 equitable frameworks and policies, processes and practices that limit potential unconscious bias;
  - 3.4 equal employment opportunities based on talent, capability and performance;
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- 3.5 awareness of the different needs of employees;
- 3.6 the provision of flexible work practices and policies to support employees; and
- 3.7 the attraction and retention of a diverse range of talented people.

The Company is committed to achieving the objectives set out in this Policy by embedding a strong diversity framework within its systems and culture.

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#### 4. BOARD'S RESPONSIBILITIES

- 4.1 The Board and Executive Staff are responsible for designing and overseeing the implementation of this Policy.
- 4.2 The directors of the Company and Executive Staff are responsible for promoting diversity within the Company and monitoring the effectiveness of this Policy. The Company recognises that it needs to provide Personnel with appropriate guidance, training and resources to foster diversity and inclusion across the Company. To achieve this, the Company is committed to providing Personnel with the appropriate guidance, training and resources to understand the benefits of diversity in recruitment strategies, management strategies and the day-to-day operations of the Company. The Board and Executive Staff are committed to developing initiatives that will promote and enable the Company to achieve its diversity goals.
- 4.3 The Company's diversity objectives are set out in Clause 7. Practical examples of implementing the Company's diversity objectives are:
  - 4.3.1 **Employment:**  
Monitor and ensure that there are appropriate selection criteria used when employing new members of staff, which are based on diverse skills, talent and experience. Direct or inferred discrimination will not be utilised or tolerated in any advertising, recruitment documents, behaviours or practices.
  - 4.3.2 **Training:**  
Opportunities to train and advance careers for employees will be based on merit and experience together with the needs of the Company. Executive mentoring programs and other training opportunities for employees wishing to prepare for senior management opportunities will be made available to relevant employees based on merit and skill set. Direct or inferred discrimination will not be utilised or tolerated in any training opportunity selection or practices.
  - 4.3.3 **Leadership and Role Models**  
Focus on the participation of women and other legal minorities on the Board, within senior management and leadership positions.

#### 4.3.4 **National, Regional and Local Laws**

The Board and Executive Staff will ensure that the Company strives to be in compliance with any established laws pertaining to diversity.

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### 5. **AUDIT & GOVERNANCE COMMITTEE'S RESPONSIBILITIES**

The Company's Audit & Governance Committee is responsible for reviewing this Policy and will provide the Board with an annual report on the status of diversity within the Company and the effectiveness of the current objectives for achieving diversity.

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### 6. **PERSONNEL'S RESPONSIBILITIES**

All Personnel are required to act in a manner that supports diversity within the workplace and promotes the objectives set out in this Policy. Employees are encouraged to provide feedback to management regarding programs or initiatives which will improve the Company's approach to diversity, equity and inclusion in the workplace.

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### 7. **MEASURABLE OBJECTIVES**

The Company recognises that diversity amongst its Personnel:

- 7.1 can broaden the pool of high-quality directors, executives and employees;
- 7.2 can support employee retention;
- 7.3 can encourage innovation by drawing on different perspectives, experiences, skills and talents;
- 7.4 is a socially and economically responsible governance practice; and
- 7.5 can improve the Company's corporate reputation.

The Board and Executive Staff will adopt measurable objectives to assist the Company to achieve diversity and review the Company's progress in meeting these objectives each year.

The Company's Audit & Governance Committee will work with the Executive Staff, to establish such measurable objectives and ensure their effectiveness.

The Company will disclose annually the actions taken in accordance with its objectives for achieving diversity and share its progress across the whole organisation.

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**8. REPORTING BREACH OF THE DIVERSITY POLICY**

- 8.1 All Personnel are responsible for complying with this Policy and reporting any actual or potential breaches which should be reported to the Company's CEO or if by the CEO, then to the Chair of the Board.
- 8.2 The Board, with advice and assistance from the Company's Audit & Governance Committee, is responsible for monitoring compliance by the Company with this Policy.

***This Policy was adopted by the Board effective 25 January 2022.***