

DIVERSITY POLICY

1 PURPOSE

Diversity results from, but is not limited to, a mix of gender, age, ethnicity, cultural background, physical ability, lifestyle and education. This policy reflects inclusiveness and recognises our individual differences, perspectives and approaches and encompasses acceptance and respect.

Pacific Nickel Mines Limited (“PNM”) is committed to a diverse workforce and this policy is designed to inform its employees and other interested parties of how this commitment will be met.

PNM recognises the value and benefits to its business, employees and customers that stem from incorporating diversity into its business practices. A more diverse workforce facilitates a strong corporate reputation, enhances organisational performance and aims to improve the quality of life for its workforce, their families, communities and society at large.

PNM values the unique contributions made by people with diverse backgrounds, experiences and perspectives, and believes that greater diversity of thought throughout the organisation will lead to more informed decision making and ultimately better business outcomes.

2 SCOPE

This policy applies to all PNM employees. It encompasses other relevant policies as outlined below.

3 POLICY STATEMENT

At PNM, diversity amongst our people is embraced by valuing and drawing on our different backgrounds, experiences and skills.

PNM is committed to providing a workplace that values and manages diversity, where all employees are treated with respect and that seeks to meet the varying needs of our employees. To achieve a workplace that values and manages diversity, PNM will:

- Treat people fairly by providing equal employment opportunities that will attract and place the best available person to each vacant position at all levels of the organisation (including board level). PNM seeks to achieve greater gender diversity where appropriate based on skill and merit.
- Facilitate a workplace where employees are treated with integrity and respect, recognising that all employees of PNM have the right to work in an environment free from discrimination and harassment.
- Provide flexible work practices that where appropriate assist the differing needs of employees and facilitate the integration of work and personal commitments.
- Seek to develop the skills of women in the organisation as an under-represented group.
- Seek to established a work environment which:
 - recognises and respects the unique attributes that each individual brings to the workplace;
 - fosters an inclusive and supportive culture to enable people to develop to their full potential.
- Take action to investigate and where appropriate prevent / stop bullying, discrimination or harassment.

- Reward and remunerate fairly.
- Develop communication strategies to create diversity awareness and understanding across the organisation.
- Review policies, processes and guidelines relating to diversity on an annual basis, inform managers and leaders of the content and their obligations in relation to policy implementation and ensure all employees are informed of policy existence and location.
- Investigate and where appropriate establish measurable objectives for achieving gender diversity. The board will assess progress towards achieving objectives on an annual basis.
- Comply with legal requirements relating to diversity.

4 CURRENT DIVERSITY OBJECTIVES

PNM's current diversity objectives endorsed by the Board relate to:

1. Achievement of greater gender balance at all levels across the organisation including women in senior executive positions; and
2. Employee flexibility

5 POLICIES, PROCESSES AND GUIDELINES THAT SUPPORT DIVERSITY

Our approach to diversity is supported by the Company's Code of Conduct.

6 RESPONSIBILITIES

The Board is responsible for establishing diversity-related objectives – specifically related to gender diversity – and monitoring and reporting progress towards achieving these objectives on an annual basis.

Leaders/Managers are responsible for creating and promoting a diverse workplace to enable achievement of business objectives, modelling behaviours that support a diverse workforce and ensuring that all inappropriate behaviours are addressed in a timely manner in accordance with the appropriate policy/ies.

All employees are responsible for developing and maintaining a diverse workplace and behaving appropriately in accordance with PNM's policies and procedures.

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