

2020 - 21 Compliance Program

Submitted by:

Cochlear Limited (ABN:96002618073)



#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	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	01-Jul-2022

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

In addition to our established policies and process we have updated two of our key policies to further improve our talent processes to ensure more equitable talent decisions. We have updated our Global Career

Development policy and established new guidelines for managers and People & Culture team members to make more equitable talent decisions. We have also updated our Diversity & Inclusion policy which informed many of these changes.

Our Diversity and Inclusion strategy includes set targets to increase the number of senior female hires, female internal placements and female successors. To achieve this and attract wider pools of talent we have worked on optimising our talent management processes (recruitment, development, and succession planning) ensuring they are equitable and free from bias.

Governing bodies

Cochlear 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?	Cochlear 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 (F)	0
...Male (M)	1
...Gender X	0
...Members	
...Female (F)	3
...Male (M)	7
...Gender X	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>)
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?	30.00%
10.7: What year is the target to be reached (select the last day of the target year)?	01-Feb-2022
11.1: Confirm how the ultimate parent's governing body/ies are being reported:	

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

In February 2020 Cochlear set a target of 30% female representation on our board which was achieved in December 2020 (which was prior to the set deadline).

#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(<i>Select all that apply</i>)
...Yes	To achieve gender pay equity 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

2: Did your organisation receive JobKeeper payments?

Yes

2.1: Please indicate which months in the reporting period your organisation received JobKeeper payments:

.. April 2020

Yes

...May 2020

Yes

...June 2020

Yes

...July 2020

No

...August 2020

No

...September 2020

No

...October 2020

No

...November 2020

No

...December 2020

No

...January 2021

No

...February 2021

No

...March 2021

No

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

31-Mar-2021

4: 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(*Select all that apply*)

1.2: Did you take any actions as a result of your gender remuneration gap analysis?

Analysed performance pay to ensure there is no gender bias (including unconscious bias)
 Analysed performance ratings to ensure there is no gender bias (including unconscious bias)
 Reported pay equity metrics (including gender pay gaps) to the governing body
 Reported pay equity metrics (including gender pay gaps) to the executive
 Trained people-managers in addressing gender bias (including unconscious bias)
 Corrected like-for-like gaps
 Conducted a gender-based job evaluation process

.. 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)

We finalised the work on organisational-wide like-for-like roles pay gap analysis and have made pay adjustments where necessary. We continue this analysis work now as part of our BAU process, so this has become part of our ongoing annual remuneration reviews

2: 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?

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

1.1: How did you consult employees?

Survey
 Exit interviews

1.2: Who did you consult?

ALL staff

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

In addition to our yearly employee engagement survey we have conducted numerous All Employee Town Hall meetings where we have invited employees to discuss and provide feedback on various matters such as Flexible Work and overall Diversity & Inclusion topics.

#Employee work/life balance

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	Yes
...Targets have been set for men's engagement in flexible work	No(<i>Select all that apply</i>)
...No	Not a priority
...Leaders are held accountable for improving workplace flexibility	No(<i>Select all that apply</i>)
...No	Not a priority
...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	No(<i>Select all that apply</i>)
...No	Insufficient resources/expertise
...Employees are surveyed on whether they have sufficient flexibility	Yes
...The organisation's approach to flexibility is integrated into client conversations	No(<i>Select all that apply</i>)
...No	Not a priority
...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
...Other (provide details)	No

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
...Compressed working weeks	No(<i>You may specify why the above option is not available to your employees.</i>)
...No	Other (provide details)
...Other (provide details)	Created inequity issues/discussion within teams
...Time-in-lieu	No(<i>You may specify why the above option is not available to your employees.</i>)
...No	Not a priority
...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
...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
...Purchased 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
...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

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

Yes

4: Were managers in your organisation allowed to make INFORMAL flexible working arrangements with their team members in response to the COVID-19 pandemic?

Yes, ALL managers

5: Did you see an increase, overall, in the approval of FORMAL flexible working arrangements for your workforce compared to pre-COVID-19?

Yes, for both women and men

6: If your organisation would like to provide additional information relating to flexible working and gender equality in your workplace, please do so below.

We have expanded our flexible work offering in Australia and have also launched flexible work in other locations globally. We have reinforced the importance of this and leveraged the lessons learned from the COVID-19 pandemic to continue to reinforce flexible ways of working. Our current data shows that more than 90% of our eligible employees in Australia are working flexible and this is consistent for male and female employees.

#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?	18
1.1.f: What proportion of your total workforce has access to employer funded paid parental leave for primary carers, including casuals?	91-100%
1.2: Do you provide employer funded paid parental leave for secondary carers in addition to any government funded parental leave scheme?	Yes(<i>Please indicate how employer funded paid parental leave is provided to the secondary carers.</i>)
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?	3
1.2.f: What proportion of your total workforce has access to employer funded paid parental leave for secondary carers, including casuals?	90-100%

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.

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 SOME 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

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

...No

Not a priority

...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

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

...No

Not a priority

...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)	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Support in securing school holiday care	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Coaching for employees on returning to work from parental leave	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Parenting workshops targeting mothers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Parenting workshops targeting fathers	No(<i>You may specify why the above support mechanism is not available to your employees.</i>)
...No	Not a priority
...Other (provide details)	Yes(<i>Please indicate the availability of this support mechanism.</i>)
...Yes	Available at ALL worksites
...Available at ALL worksites	Our Employee Assistance Program offers support tools (access to information and coaching) for returning parents.

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

Sex-based harassment and discrimination

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
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(<i>Please indicate how often is this training provided (select all that apply):</i>)
...Yes	At induction
...All employees	Yes(<i>Please indicate how often is this training provided (select all that apply):</i>)
...Yes	At induction

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

We recently updated our Respectful Workplace training for both, manager and employee to reinforce this topic. We have also converted this into an online training to offer better access to the training and help us ensure 100% completion rate.

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(<i>Select all that apply</i>)	
...Yes	Policy

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(<i>Select all that apply</i>)
...No	Not a priority
...A domestic violence clause is in an enterprise agreement or workplace agreement	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	
...Workplace safety planning	Yes
...Access to paid domestic violence leave (contained in an enterprise/workplace agreement)	No(<i>Select all that apply</i>)
...No	Not a priority
...Access to unpaid domestic violence leave (contained in an enterprise/workplace agreement)	No(<i>Select all that apply</i>)
...No	Currently under development(<i>Select the estimated completion date.</i>)
...Currently under development	01-Jul-2022
...Access to paid domestic violence leave (not contained in an enterprise/workplace agreement)	No(<i>Select all that apply</i>)
...No	Not a priority
...Access to unpaid leave	Yes
...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)	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Whilst not formalised we have informally offered support where required.
...Offer change of office location	Yes
...Emergency accommodation assistance	No(<i>Select all that apply</i>)
...No	Insufficient resources/expertise
...Access to medical services (e.g. doctor or nurse)	No(<i>Select all that apply</i>)
...No	Other (provide details)
...Other (provide details)	Whilst not formalised, we do refer to medical service if needed. This provides our employees with quick access to services (e.g. in case they don't have access to their medicar card) and it gets billed directly to the company.
...Other (provide details)	No(<i>Select all that apply</i>)

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