



Diversity Policy

- 1. Scope**

This policy and procedure applies to the Company / 360 Capital and its Group, including directors (Board), employees and contractors of the Company and the Group. The Company / 360 Capital means 360 Capital Group Limited. The Group means the Company stapled to 360 Capital Investment Trust (jointly listed on the ASX under the ticker code TGP) and all of its subsidiaries including responsible entities.

- 2. Policy Statement – Commitment to Diversity and Inclusion**

Diversity means the prevalence of difference in the workplace, including women and men from different countries, cultures, ethnicities, generations and all the other unique differences in their backgrounds that make them who they are.

360 Capital encourages diversity in employment and in the composition of the Group Boards as a means of ensuring the organisation has an appropriate mix of skills and talent to conduct its business and achieve the Company's goals. The Board aims to foster an environment where:

 - a) individual differences are valued and respected;
 - b) the ability to contribute and access employment opportunities is based on performance, skill and merit regardless of age, gender, ethnicity, sexual preference, physical ability or cultural or religious beliefs;
 - c) inappropriate attitudes, behaviours and stereotypes are confronted and eliminated; and
 - d) equal opportunities in respect to employment and employment conditions are actively promoted.

360 Capital recognises the benefits of diversity in that people with different experiences, backgrounds and perspectives provide unique view points and innovative solutions. 360 Capital believes that the promotion of diversity broadens the pool for recruitment of high quality candidates which adds to a balanced perspective, improved stakeholder satisfaction and is a socially and economically responsible governance practice.

- 3. Gender Diversity**

To drive diversity and inclusion within the Group, the Board have set the following objectives:

 - a) maintain or increase the percentage of women in the business more specifically in leadership roles;
 - b) and actively promote a culture that values diversity, inclusion and flexibility.



4. Achieving Diversity

Managing Director and Boards are responsible for driving diversity and inclusion through:

Leadership Responsibility:

- demonstrating a commitment to diversity and inclusion and creating an environment where people respect each other and interact within a workplace that is free from unlawful discrimination, harassment and bullying;
- developing a culture that promotes the attainment of the diversity principle in supporting employees to balance their career and home-life, and to promote work flexibility consistent with business success;
- foster individual career development where the ability to contribute and access opportunities are based on merit;
- ensure that inappropriate behaviour or attitudes within the working environment are confronted promptly and appropriately addressed.

Recruitment and Development:

- facilitate equal employment opportunities through recruitment and promotion that is based on criteria that include previous experience, demonstrated skills, relative ability, performance and/or potential and the ability to add to the diversity of the workforce;
- candidates undergo an equal recruitment and selection process with an aim to present a diverse pool of candidates to the Company for consideration, which may include engaging professional consultants as necessary to assist in the hiring process;
- 360 Capital provides internal and external training opportunities based on merit and in light of Company and individual needs to enable the development of an individual's full potential.

Communication:

- continually communicating the Diversity Policy, its values and initiatives both internally and externally;
- maintaining a zero tolerance stance towards unlawful discrimination, harassment and bullying.

Individual Responsibility

Everybody in the Group is expected to demonstrate commitment to diversity and inclusion by:

- communicating and interacting with others courteously and respectfully recognising that people with: different experiences, backgrounds and perspectives bring unique view points and innovative solutions to the business;



- acting to prevent or stop unlawful discrimination, harassment and bullying in their workplace, including where necessary raising any diversity concerns quickly and constructively so as to enable appropriate resolution.

5. Measuring our Success

The Boards will assess the gender diversity objectives annually and the progress made towards achieving them by:

- Reporting in each annual report the measurable objectives and progress made towards achieving those objectives;
- Reporting in each annual report the respective proportions of men and women on the boards, in senior executive positions and across the whole organisation, including how the Company defines senior executive.

6. Resolving Concerns Under this Policy

360 Capital recognises that individuals may become concerned about non-compliance with the obligations set out in this policy. 360 Capital encourages people to raise any such concerns quickly and constructively to achieve prompt resolution.

Where an individual is concerned that someone's behaviour is inconsistent with this policy, it may be appropriate that they raise their concerns directly with that person. If the individual feels uncomfortable approaching the person directly, or if the issue cannot be resolved through direct discussion, then the concerned individual should quickly raise the issue with a relevant manager the individual is comfortable talking to about their concern. 360 Capital will act to resolve such issues quickly, respectfully and constructively.

7. Related Resources Documents & References

Other relevant policies and procedures include:

- ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (3rd Edn)
- FM006: Code of Conduct