

Diversity Policy

Eildon Capital Group

1 INTRODUCTION

1.1 Commitment to diversity

The Eildon Capital Group (**Group**) consists of Eildon Capital Limited ACN 059 092 198 (**Company**) and Eildon Capital Trust ARSN 635 077 753 (**Trust**). Eildon Funds Management Limited ACN 066 092 028 (**Manager**) is the responsible entity for the Trust.

The Group endeavours to create a diverse work environment in which everyone is treated fairly and with respect and where everyone feels responsible for the reputation and performance of the Group.

The Group is committed to compliance with the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations on diversity.

This document reflects the commitment of the Group and its subsidiaries to workplace diversity at all levels of their business.

Unless otherwise specified, capitalised terms not defined in this document have the same meaning given under the *Corporations Act 2001* (Cth).

1.2 Purpose

The purpose of this policy is to outline the Group's commitment to fostering a corporate culture that embraces diversity and, in particular, focuses on the composition of the boards of directors of the Company and the Manager (**Board**) and senior management. The policy also provides a process for the Board to decide measurable objectives and procedures which the Group will implement and report against to achieve its diversity goals.

2 DIVERSITY

2.1 What is diversity?

Diversity includes, but is not limited to, diversity of gender and gender identity, age, abilities, ethnicity, cultural background, marital/family status, sexual orientation and/or religious beliefs.

2.2 Benefits of diversity

The Group believes that promoting a diverse workforce:

- (a) enables the Group to achieve improved outcomes by benefiting from the differing perspectives and expertise that people from diverse backgrounds bring to their roles;
- (b) better represents the diversity of the Group's stakeholders;
- (c) attracts, retains and motivates employees from the widest possible pool of available talent; and
- (d) is consistent with the Group's broader corporate governance framework, including the Group's Code of Conduct Policy.

3 PROMOTING DIVERSITY

The Group promotes a diverse workforce by aiming to:

- (a) ensure that all employees and applicants for employment are fairly considered according to their skills, qualifications, abilities and aptitudes without regard to factors that are irrelevant to the person's skill or ability to fulfil the inherent job requirements;
- (b) create an inclusive and flexible workplace culture, which recognises the domestic responsibilities of its workforce;
- (c) maintain a safe work environment by taking action against inappropriate workplace and business behaviour – discrimination, harassment, bullying, victimisation and vilification will not be tolerated;
- (d) identify and implement appropriate programs to assist with the development and advancement of a broader and more diverse pool of skilled and experienced employees; and
- (e) set diversity-related goals and performance objectives for senior executives.

4 ROLES AND RESPONSIBILITIES

Every employee of the Group is responsible for supporting the Group's commitment to workplace diversity.

The Board has an overarching role to:

- (a) monitor the effectiveness of this policy from time to time;
- (b) adopt, assess and review the measurable objectives for achieving diversity from time to time; and
- (c) review those objectives and the Group's progress in achieving them.

5 ANNUAL DISCLOSURE TO SECURITYHOLDERS

5.1 Purpose of reporting

- (a) The Group acknowledges that reporting to stapled security holders on its diversity profile and diversity objectives facilitates greater transparency and accountability on diversity matters and that this reporting and transparency has been endorsed by the Board.
- (b) It is anticipated that shareholders will have greater confidence in the Group and the Board if they are fully informed of the diversity policies and the measurable objectives which have been implemented to facilitate the performance of the Group.

5.2 What will be reported?

- (a) As part of its annual reporting requirements to shareholders, the Group will disclose the measurable objectives set by the Board for achieving diversity under the diversity profile and will report on its progress against those objectives. A copy of the measurable objectives may also be published on the Company's website from time to time. If applicable, the Company's most recent 'Gender Equality Indicators' as defined in the *Workplace Gender Equality Act 2012* (Cth) may be published.
- (b) A component of the Group's disclosure on diversity in its annual report will also include information about:

- (i) the proportion of women employees in the Group;
 - (ii) the number of women in senior management positions; and
 - (iii) the number of women on the Board.
- (c) The Board will work out the most appropriate method to present this information to ensure that it is accurate and does not falsely represent the participation of women and men within the Group both in terms of the number of members and types of roles, and in terms of part-time and casual compared with full-time equivalent categories of employees.

5.3 Board selection process

The Group is also committed to achieving greater transparency of the Board candidate selection and nomination process and may include in its annual report information about the mix of skills and diversity which the Board is looking to achieve in membership of the Board as set out in the Nomination Committee charter.

6 REVIEW OF THIS POLICY

The Board is responsible for reviewing this document from time to time. This document may be amended by resolution of the Board.