

Diversity Policy

Eildon Capital Group

(comprising Eildon Capital Limited ACN 059 092 198 and Eildon Funds Management Limited ACN 066 092 028 as responsible entity for Eildon Capital Trust ARSN 635 077 753)

Adopted on 26 April 2023

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.

This Policy covers the Group and each of their related bodies corporate (as that term is defined in section 50 of the *Corporations Act 2001* (Cth)), including subsidiary and affiliate entities over which it exercises control, and to directors, officers and employees of the Group (whether permanent, fixed term, casual, contracting, consulting or temporary) (collectively, the **Employees**).

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 acknowledging 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 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 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;
- (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 BOARD SELECTION PROCESS

The Group is 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.

6 REVIEW OF POLICY

This Policy will be reviewed at least every two years and may be amended by resolution of the Board.