



Code of Conduct

- 1. Scope**

This Code of Conduct applies to the Company / 360 Capital and its Group, including directors (Board), employees, contractors and consultants 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.

This Code of Conduct has been approved by the Board and sets the minimum level of standards by which all officers, contractors, consultants and employees of the Group will conduct themselves in the course of their duties, however these standards cannot anticipate the particular facts of every situation and must be interpreted and applied within the framework of a general expectation of conduct at the highest ethical levels, the Group's other policies and Australian laws.
- 2. Honesty and Integrity**

We are to act in the best interest of 360 Capital and its Group and with honesty, integrity and fairness.
- 3. Care and Diligence**

We exercise due care and diligence in the conduct of our duties and will not take advantage of our position or the opportunities arising from the Company or the Group for personal gain.
- 4. Conflict of Interest**

 - In circumstances where our personal interests conflict with that of the Company / Group or its security holders, we must take action to remove or manage the conflict having regard to the interest of our security holders;
 - Any interest which may constitute a conflict of interest must be reported to the Compliance Manager / Company Secretary;
 - We review and declare all related party transactions to the Board for approval after checking for appropriateness and ensuring they are in the best interest of security holders;
 - Conflicts of interest and related party transactions are dealt with in more detail in our Conflict of Interest Policy and Related Party Transactions Policy.
- 5. Privacy**

We hold and use personal information in relation to customers, employees or other persons in accordance with privacy laws.
- 6. Fair Trading and Dealing**

 - We do not engage in any activity that could be considered insider trading;



- We do not engage in misleading, coercive or deceptive conduct or provide false or misleading information either directly or by omission;
 - When personally dealing in securities of the Company or within the Group we adhere to the Personal Dealing/Share Trading Policy.
- 7. Improper use of Information / Property**
- We do not make use of improper inside information gained in the course of our employment with the Company / Group in order to gain, or seek to gain, a benefit or advantage for ourselves or for any other person;
 - We do not take advantage of the property of the Company or the Group or the business name for personal gain or to the detriment of the Company or the Group or engage in any activity that could negatively affect the Company's reputation.
- 8. Compliance with Laws**
- We take all necessary steps to comply with any applicable laws and regulations;
 - We do not knowingly participate in any illegal or unethical activity.
- 9. Employment Practices**
- We use Company and Group resources appropriately and in accordance with any applicable Company policy;
 - We treat all security holders, employees and other persons with respect and dignity and allow for diversity and inclusion;
 - We do not tolerate unlawful discrimination, bullying or harassment;
 - We do not breach confidentiality and confidential information will only be used in the proper course of our duties;
 - We take all steps necessary to maintain a safe work environment;
 - We do not accept benefits such as gifts or entertainment when the situation could be seen as creating an obligation or the expectation of an obligation;
 - We do not accept or provide gifts or entertainment that can reasonably be seen as excessive or that will reflect negatively on the reputation of the Company or Group;
 - We do not give or accept bribes;
 - We are to act efficiently, having regard to our duty in relation to care and skill, when providing services to our security holders and customers.
- 10. Compliance**
- Any person breaching this Code may be subjected to disciplinary action including termination of employment;
 - We encourage employees to immediately report any breach or potential breach of this Code to the Compliance Manager / Company Secretary.