

Diversity Policy

Elanor Investors Group comprising Elanor Investors Limited (ABN 33 169 308 187) and Elanor Funds Management Limited (ABN 39 125 903 031, Australian Financial Services Licence Number 398196) as Responsible Entity of Elanor Investment Fund (ARSN 169 450 926) (together the “Group”)

1 Overview

- 1.1 This policy applies to the Board and all other employees of the Group.
- 1.2 The Group is committed to establishing and maintaining employee and Board diversity, which recognises the strategic and personal advantages that arise from a workplace where decisions are based on merit and all employees are treated equally.
- 1.3 Diversity includes differences that relate to gender, age, ethnicity, disability, sexual orientation and cultural background, as well as background and life experience, professional skills, education, job function, personality, communication skills, marital status, carer responsibilities and location (**Diversity**).

2 Purpose

- 2.1 The Group has adopted this policy to acknowledge and appreciate the diverse range of abilities and perspectives that employees bring to the Group through their Diversity.

3 Benefits

- 3.1 The Group understands that organisational performance is inextricably linked to Diversity through fostering an inclusive environment which recognises a variety of quality employees, improves employee retention, embraces different perspectives and enhances the Group's reputation.
- 3.2 This policy is specifically designed to assist the Group to reach its strategic goals by;
 - (a) ensuring that all employees are treated with equality and respect;
 - (b) facilitating employment opportunities based on attracting, rewarding and retaining skilled staff;
 - (c) developing flexible workplace practices to recognise and meet the diverse needs of employees;
 - (d) building and maintaining a safe and open workplace;
 - (e) contributing to the community by fostering a culture of acceptance and teamwork; and
 - (f) meeting the Group's obligations under the ASX Corporate Governance Principles and Recommendations.

4 Implementation

- 4.1 This policy is put into practice through a combination of:

- (a) prescribed measurable targets (**Measured Objectives**) for the Board to assess annually;
- (b) education programs for all employees;
- (c) human resource initiatives, policies and processes, including, where appropriate, the use of professional intermediaries;
- (d) internal communications and culture campaigns; and
- (e) regular evaluation and review.

5 Policy assessment strategies

5.1 To ensure the Group's commitment to promoting Diversity is ongoing, the Measured Objectives will be derived from, but not limited to, the following assessment strategies:

- (a) gender diversity
 - (i) assessing the prevalence of female employees in the organisation against the prevalence of females in senior management and Board positions;
- (b) ethnicity and cultural diversity
 - (i) assessing the prevalence of ethnically and culturally diverse employees in the organisation against the prevalence of ethnically and culturally diverse employees in senior management and Board positions;
- (c) performance objectives
 - (i) assessing the Group's human resource policies and objectives against this policy;
- (d) consultation and communication
 - (i) assessing the Group's education and communication policies, promotion and materials against this policy; and
- (e) workplace flexibility
 - (i) assessing the Group's performance objectives against the flexibility needs of a varied range of employees.

6 Monitoring and reporting

6.1 The Board is responsible for:

- (a) overseeing the implementation of this policy;
- (b) monitoring the prescribed Measured Objectives for achieving Diversity on the Board and in the workplace generally;
- (c) the annual formal review of the effectiveness of this policy against the Measured Objectives; and
- (d) ensuring the progression of this policy, including implementing strategies to do so.

- 6.2 The annual reporting of achievement against the Measured Objectives will be published with other ASX reporting on the Group's website.
- 6.3 The findings of the Board's review will be disclosed in the Group's annual report.