



Diversity Equity & Inclusion Policy

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| Owner | CEO |
| Approval | Chairman |
| Relates to | ECP Asset Management Pty Ltd |
| Date Last Updated | 19-03-2026 |
| Primary Rules/Rationale | To outline commitments of an inclusive work environment that provides equitable access to opportunities and rewards |

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Policy

Introduction

Overview

This policy formally outlines ECP Asset Management Pty Ltd (ECP) principles and commitments to creating an inclusive work environment that provides equitable access to opportunities and rewards to all employees and staff across ECP and associated entities.

ECP believes that it is a necessary step for any business to ensure an inclusive work environment that fiercely protects people's right to bring their whole self to work. Creating a collaborative and innovative environment for all our employees means having diversity of thought and the ability to incorporate different points of view driving maximum engagement.

ECP recognises that providing "equal" or identical support to all employees does not always result in fair outcomes. We are committed to Equity—the proactive identification and removal of barriers that may prevent certain individuals or groups from reaching their full potential.

ECP's core values permeate everything we do. To ensure we are achieving the best outcomes for our clients, we encourage and promote a culture of mutual respect, recognition, and support for all members of our team where their new ideas, different perspectives and skills are respected and recognised.

Additionally, to create a high-performance investment team we need to be capable of thinking methodically and discerningly, but also broadly and openly. Having diverse ways of thinking is a requirement of any successful asset manager.

Objective

This policy aims to provide the foundations and structure to allow diversity and inclusion of all employees, no matter race, religion, gender, or ethnicity.

For the purposes of this policy, diversity includes gender, age, ethnicity, cultural background, physical ability, impairment or disability, sexual preference and religion.

Application

This policy must be adhered to for all of the Company's activities and by all directors, employees, suppliers and consultants. This policy applies to both Board Diversity and Employee Diversity.

This policy applies to ECP and its associated entities.

ECP's Diversity & Inclusion Policy should be read in conjunction with the Staff Code of Conduct, ECP Parental Leave Policy, Employment Benefits Policy.

Policy

Continued

Framework

Application

The responsibility for the development and monitoring of this policy sits with the Compliance Manager. All employees of ECP and its associated entities are responsible for adhering to this policy and providing feedback to the board in reviewing this policy.

The Board is responsible for:

- Establishing and monitoring the Company's overall diversity strategy and policy;
- Setting targets on diversity;
- Monitoring achievement of diversity targets; and
- Including diversity objectives in Board recruitment, Board performance evaluation and succession planning processes; and
- Ensuring that proactive steps are taken by senior management to seek out and prevent discrimination or harassment.

Managers are responsible for:

- Creating an environment where there is tolerance of diversity and where the ability to contribute and access opportunities is based upon merit;
- Ensuring that during recruitment processes consideration is given to current diversity within the Company in race, gender, age, cultural heritage, origin, physical ability and language; and
- Ensuring appropriate culture and behaviour is positively encouraged; and
- Ensuring that inappropriate behaviour or attitudes within the working environment are confronted promptly; and
- Supporting employees who require flexible work arrangements.

Employees are responsible for:

- Behaving in a way that is consistent with the Company's values and policies;
- Respecting different ways of thinking and working to maintain a workplace that is free from discrimination and harassment;
- Ensuring that all required work outcomes are achieved with flexible work arrangements; and
- Being aware of the Company's diversity initiatives and where appropriate, be involved.

Implementation

ECP will continue to strive to provide the best possible working environment, one that is inclusive and diverse, one of respect and respects all opinions, views, and backgrounds.

The Compliance Manager, and the Board will review this policy regularly, seeking ongoing advice regarding contemporary working environments and to ensure that all employees have the opportunity and to contribute toward building a better, more inclusive business.

A policy review shall include a review of the diversity objectives and initiatives to ensure that these remain appropriate and current; and to review the progress of achieving the diversity objectives.

Diversity

Gender Diversity

Principles

ECP is continuously evolving and working towards greater diversity and inclusion. The objective of this policy is to ensure that our working environment ensures appropriate gender representation, celebrates cultural backgrounds and social diversity. Ensuring we are open and challenging ourselves to do things more inclusively is our commitment to all our stakeholders.

To date, ECP has introduced several initiatives aimed at ensuring all employees are provided equal opportunity and recognition within our working environment. These include:

- A market-leading gender-neutral commencement salary, which guarantees no unconscious gender bias when offering a salary to prospective employees and avoids the embedding of a gender pay gap.
- Under this policy staff will have access to a period of fully paid parental leave for up to six (6) months if they are the primary carer or up to one (1) month if they are the secondary carer.
- An apprenticeship program, regardless of gender, which allows all employees the same equitable access to achieving status within the firm based on a defined tenure program that provides equal equity-sharing opportunities amongst all the investment team.

Commitments

ECP has set a 30% target female representation of our total workforce, which includes our investment team and associated entities that provide back-office support. Where ECP or its associated entities have 2 or more directors on the board, we have a goal to reach and maintain 50% gender diversity.

Regarding the investment team, ECP is committed to ensuring we seek out the highest quality investment professionals and has set an ambitious goal of achieving and maintaining 30% gender diversity.

As part of the diversity program, the following strategies and initiatives assist in meeting our diversity goals:

- Raising Awareness
 - Communicate the diversity policy via shared drive/s;
 - Include the diversity policy in induction training;
 - Integrate diversity into training programmes; and
 - Notify the Managers to be mindful of the diversity policy when hiring employees.
- Provide workplace free discrimination and harassment
 - Regular review of recruitment and selection processes against antidiscrimination and harassment objectives.
 - Implement policy on company expectations.

Diversity Continued

Cultural Diversity

Principles

ECP recognises that diversity of thought is key to providing optimal outcomes for our clients. To achieve above-average investment returns requires that we are open to all points of view, and to achieve that requires our firm to be representative of the global, connected world we live in.

Increasingly, businesses and investment companies have a global operating footprint. To fully understand and appreciate investment opportunities requires all our staff and resources to cover a broad range of opinions and ideas.

Commitments

To date, ECP and its associated entities have been successful at attracting and retaining employees from a broad range of cultural backgrounds. ECP is committed to not only ensuring that we have cultural diversity within our own firm, but also to ensure that the broader funds management industry has greater representation of Aboriginal and Torres Strait Islander peoples.

The board has set an aspirational goal of developing greater ties to our First Nations Peoples to drive greater participation and reconciliation through our business activities, services, and programs to develop mutually beneficial relationships with Aboriginal and Torres Strait Islander stakeholders.

ECP has, through the Pohl Foundation and other associated group companies and their association with Bond University, helped fund the education of indigenous Australians and support the wealth creation and superannuation objectives of indigenous Australians.

Inclusion

LGBTQIA+

Principles

ECP is committed to creating an environment where inclusion is embraced, and diversity is celebrated. While ECP is a small, boutique fund manager, we believe it is prudent to ensure we have the right policies and structures in place to ensure we have a safe and respectful working environment.

Where any employee of ECP or its associated entities require support to address negative stereotypes, the Compliance Manager is the primary contact. The Compliance Manager is tasked at working with employees to help ensure the right outcomes and to action the appropriate response.

Part of the responsibilities of the Compliance Manager is to ensure that appropriate avenues either internally (our CEO and Chairman) or externally (recognised LGBTQIA+ support organisations) are accessible to all employees.

Inclusion Continued

Commitments

ECP is committed to ensuring that employees can choose to talk openly about events, their friends, their network, and their views on current political commentary.

ECP is committed to ensuring that any employee that requires access and support to gender identity programs or where relevant, mental health support programs, that ECP will help facilitate and engage with appropriate, recognised organisations.

Family & Flexible Work

Principles

At ECP, we spend a huge amount of time in the workplace, and we strive to make this time a mutually rewarding exchange. We strive to ensure we provide an environment that challenges and fulfils our staff in their employment, while ensuring a positive and healthy work-life balance.

While we do believe that our office environment remains the centre point of our organisation, we do recognise that through technology and other means we can ensure that all staff are connected, can fulfill their employment, and remain fully committed to their own family and outside lives.

As a family business, we understand and embrace the role that family plays in our professional lives. While our professional lives are central to many of our own identities, we recognise that this plays one role in a much broader more fulfilled life. We want our staff to place family first, and within that to ensure we have an environment where all our families feel welcome and are included in our corporate activities.

Commitments

ECP is committed to ensuring that we are inclusive of all our employees' families and that regularly we provide opportunities for our families to be involved in our business, whether through social activities or to help their own professional development goals and ambitions.

We are committed to providing a rewarding workplace for all employees which enables all members of the ECP to balance the demands of work with other interests, obligations, and activities.

We have and will continue to ensure that we provide suitable, equitable work arrangements to meet the needs of our business and our people, providing flexible work arrangements, job-sharing or reduced hour options should that better accommodate our employees' needs whilst still meeting the demands of the organisation.

We recognise that all individuals – including non-parents – have preferences and outside commitments and we are happy to work with our employees to ensure that their work pattern suits them as much as possible.

Appendices