



## ASX Release

8 August 2022

### 360 Capital Enhanced Income Fund (ASX:TCF) Appendices 3X and 3Y - Explanation and Lodgement

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#### Explanation

After a review of past trades made by 360 Capital Group (**TGP**) in TCF securities, it has been noted that an Appendix 3X was not lodged on behalf of the following directors:

1. Tony Pitt, as director of 360 Capital FM Limited being the responsible entity of TCF and substantial shareholder of TGP;
2. Andrew Moffatt, as director of 360 Capital FM Limited being the responsible entity of TCF; and
3. John Balhausen, as director of 360 Capital FM Limited being the responsible entity of TCF.

These were not disclosed due to an administrative oversight when 360 Capital FM Limited was appointed as Responsible Entity of TCF. This administrative issue has now been identified and rectified.

Accordingly, please find attached relevant Appendix 3X for each of the above directors.

In addition to the above, please find also attached an Appendix 3Y for Tony Pitt which is being lodged to reflect his current indirect interests in TCF by virtue of his holdings in TGP.

We confirm that TGP has disclosed all relevant changes in substantial holding in TCF to date.

#### Arrangements in place under Listing Rule 3.19B

In accordance with listing rule 3.19B, 360 Capital Group has the following process in place to ensure it is able to meet its disclosure obligations:

- a. 360 Capital Group and its directors are aware of their obligations under the listing rules including listing rules 3.19A and 3.19B
- b. each director is informed of ASX disclosure requirements upon their appointment;
- c. 360 Capital Group's Share Trading Policy requires directors to advise and seek clearance from the Company Secretary prior to trading in TCF securities; and
- d. 360 Capital Group's Registry reports to the Company Secretary relevant director's interest analysis which are triggered by changes in the relevant directors' interests.

#### Additional steps to ensure compliance with Listing Rule 3.19B

360 Capital Group confirms that following this incident, it has reviewed its processes and believes that its disclosure arrangements are adequate and are being enforced.

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360 Capital



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Authorised for release by, Glenn Butterworth, Company Secretary.

For further information please contact

**Tony Pitt**  
**Executive Chairman**  
**360 Capital Group**  
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### About 360 Capital Enhanced Income Fund (ASX: TCF)

The 360 Capital Enhanced Income Fund (previously the Australian Enhanced Income Fund) was established in 2006 and provides investors access to fixed income and private credit investment opportunities across listed and unlisted issuers. TCF aims to deliver regular monthly income to investors through disciplined asset selection and risk analysis.

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### About 360 Capital Group (ASX: TGP)

360 Capital Group is an ASX-listed, investment and funds management group, focused on strategic and active investment management of real estate assets. Led by a highly experienced team, the Group operates in Australian and New Zealand investing across real estate equity and credit opportunities. We partner with our stakeholders to identify, invest and realise on opportunities.

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# Appendix 3X

## Initial Director's Interest Notice

*Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.*

Introduced 30/9/2001.

<b>Name of entity</b>	360 Capital Enhanced Income Fund (ASX:TCF)
<b>ABN</b>	ARSN: 115 632 990

We (the entity) give ASX the following information under listing rule 3.19A.1 and as agent for the director for the purposes of section 205G of the Corporations Act.

<b>Name of Director</b>	Tony Robert Pitt
<b>Date of appointment</b>	Appointed as a Director of the responsible entity, 360 Capital FM Limited (ACN 090 664 396) on 19 November 2009. 360 Capital FM Limited was appointed as responsible entity of TCF (previously AYF) on 24 September 2020.

### Part 1 - Director's relevant interests in securities of which the director is the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Number &amp; class of securities</b>
nil

+ See chapter 19 for defined terms.

## Appendix 3X

### Initial Director's Interest Notice

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#### Part 2 – Director's relevant interests in securities of which the director is not the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Name of holder & nature of interest <small>Note: Provide details of the circumstances giving rise to the relevant interest.</small>	Number & class of Securities
Units held by the ASX listed 360 Capital Group (TGP) in the name of 360 Capital Diversified Property Fund, and Tony Pitt:  a) holds TGP securities in own name b) holds more than 20% indirect TGP securities in the names of Pentagon Financial Services Pty Limited, Pentagon Capital Pty Limited, TT Investments Pty Limited and 180 Capital Pty Limited	639,958 ordinary units as at 24 September 2020, which is the date 360 Capital FM Limited was appointed as responsible entity of TCF.

#### Part 3 – Director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	n/a
Nature of interest	n/a
Name of registered holder (if issued securities)	n/a
No. and class of securities to which interest relates	n/a

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+ See chapter 19 for defined terms.

# Appendix 3X

## Initial Director's Interest Notice

*Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.*

Introduced 30/9/2001.

<b>Name of entity</b>	360 Capital Enhanced Income Fund (ASX:TCF)
<b>ABN</b>	ARSN: 115 632 990

We (the entity) give ASX the following information under listing rule 3.19A.1 and as agent for the director for the purposes of section 205G of the Corporations Act.

<b>Name of Director</b>	Andrew Graeme Moffat
<b>Date of appointment</b>	Appointed as a Director of the responsible entity, 360 Capital FM Limited (ACN 090 664 396) on 8 December 2016. 360 Capital FM Limited was appointed as responsible entity of TCF (previously AYF) on 24 September 2020.

### Part 1 - Director's relevant interests in securities of which the director is the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Number &amp; class of securities</b>
nil

+ See chapter 19 for defined terms.

## Appendix 3X

### Initial Director's Interest Notice

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#### Part 2 – Director's relevant interests in securities of which the director is not the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Name of holder & nature of interest <small>Note: Provide details of the circumstances giving rise to the relevant interest.</small>	Number & class of Securities
n/a	nil

#### Part 3 – Director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	n/a
Nature of interest	n/a
Name of registered holder (if issued securities)	n/a
No. and class of securities to which interest relates	n/a

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+ See chapter 19 for defined terms.

# Appendix 3X

## Initial Director's Interest Notice

*Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.*

Introduced 30/9/2001.

<b>Name of entity</b>	360 Capital Enhanced Income Fund (ASX:TCF)
<b>ABN</b>	ARSN: 115 632 990

We (the entity) give ASX the following information under listing rule 3.19A.1 and as agent for the director for the purposes of section 205G of the Corporations Act.

<b>Name of Director</b>	William John Ballhausen
<b>Date of appointment</b>	Appointed as a Director of the responsible entity, 360 Capital FM Limited (ACN 090 664 396) on 10 February 2016. 360 Capital FM Limited was appointed as responsible entity of TCF (previously AYF) on 24 September 2020.

### Part 1 - Director's relevant interests in securities of which the director is the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Number &amp; class of securities</b>
nil

+ See chapter 19 for defined terms.

## Appendix 3X

### Initial Director's Interest Notice

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#### Part 2 – Director's relevant interests in securities of which the director is not the registered holder

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Name of holder & nature of interest <small>Note: Provide details of the circumstances giving rise to the relevant interest.</small>	Number & class of Securities
n/a	nil

#### Part 3 – Director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

Detail of contract	n/a
Nature of interest	n/a
Name of registered holder (if issued securities)	n/a
No. and class of securities to which interest relates	n/a

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+ See chapter 19 for defined terms.



# Appendix 3Y

## Change of Director's Interest Notice

*Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.*

Introduced 30/09/01 Amended 01/01/11

<b>Name of entity:</b> 360 Capital Enhanced Income Fund (ASX:TCF)
<b>ABN:</b> 115 632 990

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

<b>Name of Director</b>	Tony Robert Pitt
<b>Date of last notice</b>	08/08/2022 (date of Appendix 3X)

### Part 1 - Change of director's relevant interests in securities

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Direct or indirect interest</b>	Indirect
<b>Nature of indirect interest (including registered holder)</b> Note: Provide details of the circumstances giving rise to the relevant interest.	Units held by the ASX listed 360 Capital Group (TGP) in the name of 360 Capital Diversified Property Fund, and Tony Pitt:  a) holds TGP securities in own name b) holds more than 20% indirect TGP securities in the names of Pentagon Financial Services Pty Limited, Pentagon Capital Pty Limited, TT Investments Pty Limited and 180 Capital Pty Limited
<b>Date of change</b>	25-Jun-2021, 29-Jun-2021, 30-Jun-2021, 01-Nov-2021, 17-Jun-2022
<b>No. of securities held prior to change (as at date of last notice)</b>	639,958 ordinary units
<b>Class</b>	Ordinary Units
<b>Number acquired</b>	37,016 by 360 Capital Diversified Property Fund (TGP)
<b>Number disposed</b>	Nil

+ See chapter 19 for defined terms.

## Appendix 3Y

### Change of Director's Interest Notice

<b>Value/Consideration</b> Note: If consideration is non-cash, provide details and estimated valuation	37,016 at an average \$ 5.6943 per stapled security by TGP
<b>No. of securities held after change</b>	676,974 ordinary units
<b>Nature of change</b> Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back	37,016 units acquired by TGP between 25 June 2021 until 8 August 2022 via on market trades.

## Part 2 – Change of director's interests in contracts

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Detail of contract</b>	n/a
<b>Nature of interest</b>	n/a
<b>Name of registered holder (if issued securities)</b>	n/a
<b>Date of change</b>	n/a
<b>No. and class of securities to which interest related prior to change</b> Note: Details are only required for a contract in relation to which the interest has changed	n/a
<b>Interest acquired</b>	n/a
<b>Interest disposed</b>	n/a
<b>Value/Consideration</b> Note: If consideration is non-cash, provide details and an estimated valuation	n/a
<b>Interest after change</b>	n/a

## Part 3 – <sup>+</sup>Closed period

<b>Were the interests in the securities or contracts detailed above traded during a <sup>+</sup>closed period where prior written clearance was required?</b>	no
<b>If so, was prior written clearance provided to allow the trade to proceed during this period?</b>	n/a
<b>If prior written clearance was provided, on what date was this provided?</b>	n/a

<sup>+</sup> See chapter 19 for defined terms.