



Diversity Policy

April 2023

Table of Contents

Document Management Sheet.....	3
Section A – Introduction	4
1. Approval Level	4
2. Purpose.....	4
3. Introduction	4
Section B – Policy.....	5
1. Scope of this policy.....	5
2. Purpose of this policy.....	5
3. Legal Constraints	5
4. Application.....	5
5. Administration and compliance	5
6. Objectives and reporting	6

Document Management Sheet

Document Owner/s

Tristan Kingcott – Fund Manager

Document Review and Approval

The Fund Manager is responsible for updating this policy as and when required:

- In the instance of internal changes affecting the policy
- In the instance of changes in applicable regulations
- As a result of a policy revision

Any changes to this document shall be presented to and accepted by the Zeta Resources Limited (“Zeta”) Board.

Review Cycle

The last review was performed: April 2023

The next review scheduled: April 2026

Document Classification

External – located on Zeta’s website

Version Control

Version	Reason for change	Date
1.0	Initial draft prepared by Dugald Morrison	August 2019
2.0	Review and update of policy by Dugald Morrison to comply with the 4 th Edition of the ASX Corporate Governance Council’s <i>Corporate Governance Principles & Recommendations</i>	July 2021
3.0	Review and format into standard policy template by Tristan Kingcott	April 2023

Section A – Introduction

1. Approval Level

This policy document is owned by Zeta Resources Limited (**Zeta** or the **company**), and any amendments made will be approved by the Board of Directors of Zeta.

When the Diversity Policy is updated, details of the changes made are recorded in the version control, and the revised version will be published in the ICM Policy Library, located at (R:\GROUP-WIDE FOLDERS\Policies\Zeta).

2. Purpose

The purpose of this policy is to outline the company's commitment to diversity in relation to appointments to the board and recognises the value of attracting and retaining directors with different backgrounds, knowledge, experience and abilities.

3. Introduction

Zeta Resources Limited is a resource-focused investment holding and development company established in Bermuda and listed on the Australian Securities Exchange (**ASX**) (ASX:ZER).

ICM Limited has been contracted by Zeta to manage its investments and undertake the company secretarial function.

As an ASX-listed company, the board's principal governance reporting objective is in relation to the ASX Corporate Governance Principles and Recommendations (Principles) developed by the ASX Corporate Governance Council. The board has developed policies and practices consistent with the Principles. Benchmarking of the company's corporate governance practices with the Principles is provided via the Corporate Governance Statement which is released to the ASX at the same time as the Annual Report.

The responsibilities set out in this policy will be carried out in accordance with the company's Bye-Laws, relevant Bermudan and Australian law, ASX Listing Rules and the ASX Corporate Governance Council's Principles.

The policy is reviewed on a regular basis and updated where necessary to reflect changes in circumstances and actual practice.

Contact details

For more information about this policy please contact the Document Owner/s.

Section B – Policy

1. Scope of this policy

- 1.1 This policy applies to the board of directors of the company (the **board**). The company currently does not have any employees and is managed by ICM Limited (the **Investment Manager**).
- 1.2 The board views diversity as including, but not being limited to, skills, qualifications, experience, gender, race, ethnicity, age, disability, and cultural background.

2. Purpose of this policy

- 2.1 The purpose of this policy is to outline the company's commitment to diversity in relation to appointments to the board and recognises the value of attracting and retaining directors with different backgrounds, knowledge, experience and abilities.
- 2.2 To ensure that a safe and supportive workplace is provided where differences are valued and respected.

3. Legal Constraints

- 3.1 This policy is separate from, and additional to, the legal constraints imposed by applicable law, the Companies Act 1981 of Bermuda, and the Corporations Act 2001 (Cth) of Australia, to the extent it applies to the company, and the Australian Securities Exchange (ASX) Listing Rules.

4. Application

- 4.1 The board must ensure:
 - (a) to include diversity objectives in the board's recruitment process, performance evaluations and succession planning process;
 - (b) that a diverse pool of qualified candidates is considered in the recruitment process;
 - (c) that there will be appropriate gender representation on the board; and
 - (d) that the Investment Manager is advised that it has a responsibility for fulfilling the obligations of a diversity policy.
- 4.2 Discrimination, harassment, vilification, and victimisation are unacceptable behaviours and will not be tolerated. The company requires directors and representatives of the Investment Manager to behave in a manner consistent with its values (refer to the Code of Conduct policy document).

5. Administration and compliance

- 5.1 The board is responsible for administering this policy and will collectively implement and monitor its effectiveness.
- 5.2 At the end of each annual reporting period, the board will review its skills matrix, experience and expertise and assess the extent to which the required skills and diversity objectives are represented on the board.
- 5.3 The policy will be reviewed periodically to check that it is operating effectively, and the board will approve any changes that may be required.

6. Objectives and reporting

- 6.1 The board will set measurable objectives in relation to gender diversity on the board.
- 6.2 Those objectives and progress against them will be assessed annually by the board and progress against those objectives will be reported to shareholders in the Corporate Governance Statement.