



ASX Release

3 August 2022

360 Capital REIT (ASX:TOT) Appendix 3Y Explanation and Lodgement

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Explanation

There is a difference in the number of securities held by TGP before the change in Appendix 3Y lodged on 28 July 2022 on behalf of Tony Pitt, and the number of securities held by TGP after the change in the previous Appendix 3Y lodged on 29 October 2021 on behalf of the same director.

The difference corresponds to a number of trades made by TGP between 29 October 2021 and 26 July 2022 which were not disclosed in the relevant Appendix 3Y on behalf of Tony Pitt due to an administrative reporting oversight. The Company Secretary normally receives a report with the directors' interest analysis, which is triggered by changes in directors' interests; however, there were no reports triggered by the above trades. This administrative reporting issue is now being rectified.

Late Appendix 3Y, with the changes of interest that occurred between 29 October 2021 and 26 July 2022, is attached.

TGP has disclosed all relevant changes in substantial holding to date.

Current holdings

The current holdings have been correctly disclosed in the Appendix 3Y lodged on 28 July 2022, being:

- 1) 1,194,887 TT Investments and Pentagon
- 2) 35,173,171 TGP
36,368,058 Total

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 TOT 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.

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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.

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 REIT (ASX: TOT)

The Fund has a demonstrated track record of consistent quarterly distributions, through a selective and disciplined investment philosophy, combined with access to real estate investment opportunities available to TOT through the 360 Capital Group, the manager of the Fund.

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

Name of entity: 360 Capital REIT (TOT)
360 Capital Active REIT (ARSN 602 303 613) stapled to 360 Capital Passive REIT (ARSN 602 304 432)

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.

Name of Director	Tony Robert Pitt
Date of last notice	29 October 2021

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.

Direct or indirect interest	Indirect
Nature of indirect interest (including registered holder) Note: Provide details of the circumstances giving rise to the relevant interest.	1) Units held by TT Investments Pty Limited atf for TT Superfund and Pentagon Capital Pty Limited which is ultimately owned by TT Investment Trust (together TT Investments). Director of TT Investments Pty Limited and Pentagon Capital Pty Limited and beneficiary of TT Investment Trust. 2) Units held by the ASX listed 360 Capital Group (TGP) held in the name of 360 Capital Property Limited, a wholly owned subsidiary of TGP and Tony Pitt: <ul style="list-style-type: none"> a) is a Director of TGP b) holds TGP securities in own name c) holds 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
Date of change	03-Nov-2021, 04-Nov-2021, 05-Nov-2021, 08-Nov-2021, 08-Nov-2021, 01-Mar-2022, 14-Mar-2022, 15-Mar-2022, 16-Mar-2022, 16-Mar-2022, and 17-Mar-2022
No. of securities held prior to change (as at date of last notice)	1) 1,172,265 TT Investments and Pentagon 2) <u>31,614,421 TGP</u> 32,786,686 Total

+ See chapter 19 for defined terms.

Appendix 3Y Change of Director's Interest Notice

Class	Ordinary Units
Number acquired	Nil by Pentagon Capital Pty Limited Nil by TT Investments Pty Ltd as trustee for TT Superfund 2,892,844.00 by 360 Capital Property Limited
Number disposed	Nil
Value/Consideration Note: If consideration is non-cash, provide details and estimated valuation	2,892,844.00 at average of \$ 0.9388 per stapled security by TGP
No. of securities held after change	1) 1,172,265 TT Investments and Pentagon 2) <u>34,507,265 TGP</u> 35,679,530 Total
Nature of change Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back	2,892,844 units acquired by TGP between the 29 October 2021 notice until 17 March 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.

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

Part 3 – +Closed period

+ See chapter 19 for defined terms.

Appendix 3Y
Change of Director's Interest Notice

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

⁺ See chapter 19 for defined terms.