

Aspen Group Diversity and Inclusion Policy

General Purpose and Principle

Aspen Group Limited ("AGL") and its subsidiaries (collectively: "Aspen Group") respects and values "diversity", and the benefit of its integration throughout Aspen Group, which is also expected to enrich Aspen Group's perspective, improve corporate performance, increase shareholder value, and enhance the probability of achievement of the Group's objectives ("Principle").

Diversity includes but is not limited to, gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious belief, cultural background, socio-economic background and experience.

Aspen Group recognises that in order to have an inclusive workplace, discrimination, harassment, vilification and victimisation cannot and will not be tolerated.

Aspen Group also recognises that diversity and inclusion is to be endorsed and practiced by all levels of the business including the Board.

Measurable Objectives and Key Performance Indicators (KPIs) –Diversity and Inclusion

With respect to diversity, Aspen Group recognises that the promotion of greater diversity could:

- encourage innovative thinking by drawing on new perspectives;
- broaden the pool for recruitment for high quality directors and employees;
- support employee retention; and
- be a socially responsible governance practice.

Compliance Requirements

Aspen Group will meet its regulatory obligations with respect to the issue of diversity (if any), including establishing measurable objectives for achieving gender diversity which the Board assesses annually.

Aspen Group shall incorporate in the Corporate Governance Statement a statement as to the mix of skills and, if applicable, the range of diversity that the Board is looking to achieve in membership of the Board. The disclosure may include information on the processes adopted in searching for and selecting new directors to the Board.

Supporting Policies and Practises

Additional Aspen Group policies that support or are related to this Policy include:

- Code of Conduct;
- Board Charter

Overriding Caveat

Nothing in this Policy shall be taken, interpreted or construed so as to endorse:

- a) the principal criteria for selection and promotion of people to work within Aspen Group being other than their overall relative prospect of adding value to Aspen Group and enhancing the probability of achievement of Aspen Group's objectives; or
- b) any discriminatory behaviour by or within Aspen Group contrary to the law, or any applicable codes of conduct or behaviour for Aspen Group and its employees; or

 any existing person within Aspen Group in any way feeling threatened or prejudiced by this policy in their career development or otherwise, merely because his or her diversity attributes at any time may be more, rather than less, common than others.

Periodic Review of Policy

This policy and its implementation will be reviewed periodically to ensure that the policy is operating effectively and for the purposes of determining if any changes are required to be made to the policy.

NB: As per the ASX Corporate Governance Principles and Recommendation (4th edition) this Diversity and Inclusion Policy is not applicable to Aspen Property Trust, externally managed by Responsible Entity, Evolution Trustees Limited.