

Form 604

Corporations Act 2001
Section 671B

Notice of change of interests of substantial holder

To Company Name/Scheme

360 Capital Total Return Fund (TOT)
The stapled entity comprising
360 Capital Total Return Active Fund (ARSN: 602 303 613) and
360 Capital Total Return Passive Fund (ARSN: 602 304 432)

ACN/ARSN

ARSN: 602 303 613 & ARSN: 602 304 432

1. Details of substantial holder (1)

Name

Salt Funds Management Limited

ACN/ARSN (if applicable)

N/A

There was a change in the interest substantial holder on:

15 January 2021

The previous notice was given to the company on

06 August 2020

The previous notice was dated

06 August 2020

2. Previous and present voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in when last required, and when now required, to give a substantial holding notice to the company or scheme, are as follows:

Class of securities (4)	Previous notice		Present notice	
	Person's votes	Voting power (5)	Person's votes	Voting power (5)
Fully Paid Ordinary Shares	8,375,886	6.034%	6,963,882	5.017%

3. Changes in relevant interests

Particulars of each change in, or change in the nature of, a relevant interest of the substantial holder or an associate in voting securities of the company or scheme, since the substantial holder was last required to give a substantial holding notice to the company or scheme are as follows:

Date of change	Person whose relevant interest changed	Nature of change (6)	Consideration given in relation to change (7)	Class and number of securities affected	Person's votes affected
11/03/2020 – 04/08/2020	Salt Funds Management Limited	On-Market Purchases	\$(262,630.14)	301,844 Ordinary	301,844
14/04/2020-26/06/2020	Salt Funds Management Limited	On-Market Sales	\$1,509,610.96	-1,713,848 Ordinary	-1,713,848

4. Present relevant interests

Particulars of each relevant interest of the substantial holder in voting securities after the change are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Nature of relevant interest (6)	Class and number of securities	Person's votes
Salt Funds Management Ltd	Guardian Nominees No.2 Ltd (custodian for BT Funds Management (NZ) Ltd)	Guardian Nominees No.2 Ltd (as custodian for BT Funds Management (NZ) Ltd)	Shareholder	5,420,940 Ordinary	5,420,940
Salt Funds Management Ltd	National Nominees Ltd (as custodian for Salt Investment Funds Ltd)	National Nominees Ltd (as custodian for Salt Investment Funds Ltd)	Shareholder	1,424,407 Ordinary	1,424,407
Salt Funds Management Ltd	BNP Paribas as custodian for Salt Investment Funds Ltd)	BNP Paribas as custodian for Salt Investment Funds Ltd)	Shareholder	118,535 Ordinary	118,535

5. Changes in association

The persons who have become associates (2) of, ceased to be associates of, or have changed the nature of their association (9) with, the substantial holder in relation to voting interests in the company or scheme are as follows:

Name and ACN/ARSN (if applicable)	Nature of association
N/A	

7. Addresses

The addresses of persons named in this form are as follows:

Name	Address
Salt Funds Management Limited	Level 3, 44 Queen Street, Auckland 1010, New Zealand
360 Capital Total Return Fund	Level 8, 56 Pitt Street Sydney NSW 2000

Signature

print name Kate Allen

capacity Operations Analyst

sign here



date

06/08/2020

DIRECTIONS

- (1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 6 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B (7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (6) Include details of:
 - (a) any relevant agreement or other circumstances because of which the change in relevant interest occurred. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
 - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.
- (7) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.
- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown".
- (9) Give details, if appropriate, of the present association and any change in that association since the last substantial holding notice.

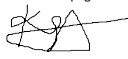
Annexure 1

Company
ACN/ARSN360 Capital Total Return Fund
602 303 613

5. Consideration

Holder of relevant interest	Nature of transaction	Date of transaction	Consideration (9)		Class and number of securities
			Cash	Non-cash	
Salt Funds Management Ltd	Purchase	05/08/2020	-\$8,791.20		10,000 Ordinary
Salt Funds Management Ltd	Purchase	06/08/2020	-\$35,642.52		41,000 Ordinary
Salt Funds Management Ltd	Purchase	07/08/2020	-\$61,006.93		70,000 Ordinary
Salt Funds Management Ltd	Purchase	10/08/2020	-\$3,572.81		4,065 Ordinary
Salt Funds Management Ltd	Purchase	11/08/2020	-\$16,520.58		19,006 Ordinary
Salt Funds Management Ltd	Purchase	12/08/2020	-\$874.12		1,000 Ordinary
Salt Funds Management Ltd	Purchase	13/08/2020	-\$11,745.62		13,437 Ordinary
Salt Funds Management Ltd	Purchase	17/08/2020	-\$21,531.41		24,492 Ordinary
Salt Funds Management Ltd	Purchase	20/08/2020	\$8,124.94		9,155 Ordinary
Salt Funds Management Ltd	Purchase	24/08/2020	-\$8,841.15		10,000 Ordinary
Salt Funds Management Ltd	Purchase	25/08/2020	\$31,981.95		36,000 Ordinary
Salt Funds Management Ltd	Purchase	27/08/2020	\$47,753.49		53,602 Ordinary
Salt Funds Management Ltd	Purchase	28/08/2020	\$5,360.36		6,000 Ordinary
Salt Funds Management Ltd	Purchase	31/08/2020	\$3,260.66		3,660 Ordinary
Salt Funds Management Ltd	Purchase	02/09/2020	\$27,381.75		31,000 Ordinary
Salt Funds Management Ltd	Sale	03/09/2020	\$12,343.40		14,083 Ordinary
Salt Funds Management Ltd	Sale	07/09/2020	\$4,329.33		5,000 Ordinary
Salt Funds Management Ltd	Purchase	11/09/2020	-\$25,924.05		30,000 Ordinary
Salt Funds Management Ltd	Purchase	14/09/2020	-\$20,033.12		23,454 Ordinary
Salt Funds Management Ltd	Purchase	16/09/2020	\$25,401.57		29,391 Ordinary
Salt Funds Management Ltd	Purchase	17/09/2020	\$30,056.53		35,000 Ordinary
Salt Funds Management Ltd	Purchase	18/09/2020	\$298.72		347 Ordinary
Salt Funds Management Ltd	Purchase	23/09/2020	\$30,532.58		34,176 Ordinary
Salt Funds Management Ltd	Purchase	24/09/2020	\$41,354.47		46,016 Ordinary
Salt Funds Management Ltd	Purchase	25/09/2020	\$64,864.80		72,000 Ordinary
Salt Funds Management Ltd	Sale	28/09/2020	\$44,405.36		49,290 Ordinary
Salt Funds Management Ltd	Sale	29/09/2020	\$19,594.85		22,012 Ordinary
Salt Funds Management Ltd	Sale	30/09/2020	-\$48,146.64		55,390 Ordinary
Salt Funds Management Ltd	Sale	02/10/2020	\$1,986.48		2,268 Ordinary
Salt Funds Management Ltd	Purchase	05/10/2020	\$5,290.21		6,060 Ordinary
Salt Funds Management Ltd	Sale	06/10/2020	\$4,789.79		5,500 Ordinary
Salt Funds Management Ltd	Sale	07/10/2020	\$9,385.73		10,801 Ordinary
Salt Funds Management Ltd	Sale	12/10/2020	\$21,709.19		25,000 Ordinary
Salt Funds Management Ltd	Sale	13/10/2020	\$54,055.88		62,250 Ordinary
Salt Funds Management Ltd	Sale	14/10/2020	\$55,852.02		64,200 Ordinary
Salt Funds Management Ltd	Sale	15/10/2020	\$4,394.27		5,017 Ordinary
Salt Funds Management Ltd	Sale	27/10/2020	\$43,954.44		50,172 Ordinary
Salt Funds Management Ltd	Sale	28/10/2020	\$10,574.78		12,039 Ordinary
Salt Funds Management Ltd	Purchase	29/10/2020	\$17,966.81		20,593 Ordinary
Salt Funds Management Ltd	Purchase	30/10/2020	\$40,322.48		46,000 Ordinary
Salt Funds Management Ltd	Purchase	02/11/2020	\$5,884.13		6,718 Ordinary
Salt Funds Management Ltd	Purchase	03/11/2020	\$9,809.80		11,200 Ordinary
Salt Funds Management Ltd	Purchase	05/11/2020	\$7,661.19		8,847 Ordinary
Salt Funds Management Ltd	Purchase	10/11/2020	\$42,776.50		49,001 Ordinary
Salt Funds Management Ltd	Purchase	11/11/2020	\$7,793.66		9,001 Ordinary
Salt Funds Management Ltd	Sale	13/11/2020	\$30,831.68		35,201 Ordinary
Salt Funds Management Ltd	Purchase	23/11/2020	\$11,169.66		12,900 Ordinary
Salt Funds Management Ltd	Purchase	25/11/2020	\$86,682.88		99,228 Ordinary
Salt Funds Management Ltd	Purchase	26/11/2020	\$75,092.82		86,000 Ordinary
Salt Funds Management Ltd	Purchase	27/11/2020	\$35,827.15		40,672 Ordinary
Salt Funds Management Ltd	Purchase	30/11/2020	\$4,844.84		5,500 Ordinary
Salt Funds Management Ltd	Purchase	01/12/2020	\$1,783.78		2,025 Ordinary
Salt Funds Management Ltd	Purchase	02/12/2020	\$23,276.38		26,575 Ordinary
Salt Funds Management Ltd	Purchase	03/12/2020	\$62,112.85		71,200 Ordinary
Salt Funds Management Ltd	Purchase	04/12/2020	\$55,363.27		62,800 Ordinary
Salt Funds Management Ltd	Purchase	07/12/2020	\$40,428.39		46,000 Ordinary
Salt Funds Management Ltd	Purchase	08/12/2020	\$15,303.53		17,373 Ordinary
Salt Funds Management Ltd	Purchase	10/12/2020	\$57,166.11		65,000 Ordinary
Salt Funds Management Ltd	Purchase	11/12/2020	\$4,355.22		5,001 Ordinary
Salt Funds Management Ltd	Purchase	15/12/2020	\$17,868.73		20,401 Ordinary
Salt Funds Management Ltd	Purchase	16/12/2020	\$41,690.78		47,599 Ordinary
Salt Funds Management Ltd	Purchase	24/12/2020	\$35,787.75		40,000 Ordinary
Salt Funds Management Ltd	Purchase	29/12/2020	\$60,314.25		66,579 Ordinary
Salt Funds Management Ltd	Purchase	04/01/2021	\$15,341.34		17,172 Ordinary
Salt Funds Management Ltd	Purchase	07/01/2021	\$22,022.00		25,000 Ordinary
Salt Funds Management Ltd	Purchase	08/01/2021	\$18,473.88		20,823 Ordinary
Salt Funds Management Ltd	Purchase	12/01/2021	\$20,198.18		22,800 Ordinary
Salt Funds Management Ltd	Purchase	13/01/2021	\$32,423.39		36,600 Ordinary

This is Annexure 1 of 1 pages referred to in Form 604 Notice of Initial Substantial Holder


 Kate Allen
15/01/2021
DateOperations Analyst
Capacity