



Portfolio Management Service

A complete portfolio management service
for financial planners, share brokers, accountants,
solicitors and other financial intermediaries.

Dated 1 July 2022

About Australian Executor Trustees

At Australian Executor Trustees (AET), we are one of Australia's largest and most experienced non-government providers of professional trustee services, with more than \$7.5 billion in funds under management and administration (as at 31 December 2021).

Established in 1880, we have been helping Australians for over 140 years to build, manage, protect and transfer their wealth so they have peace of mind about their financial future.

Today, we offer specialist estate and trustee services through our two core businesses – Private Client Services and SMSF Solutions.

Our comprehensive range of services includes:

- Wills and estate planning
- executor services
- trustee services
- philanthropic services
- SMSF solutions.

AET is part of the Insignia Financial Group.

Important Information

This investor brochure does not take into account the objectives, financial situation or needs of any particular investor. You should obtain advice from a financial adviser before making a decision to use the service.

You should be aware that investments made through the Portfolio Management Service (PMS) are subject to investment risk, which may result in possible delays in repayment and loss of capital invested and income. The performance of investments made through the PMS, the repayment of your original investment and the payment of income are not guaranteed by any person including AET and our related bodies corporate.

Contact details

Australian Executor Trustees

Registered office 44 Pirie Street
Adelaide SA 5000

Postal address GPO Box 546
Adelaide SA 5001

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Website aetlimited.com.au

Table of contents

Overview	2
Features	3
Things to consider about investing	4
The role of your financial adviser	5
Getting started	7
Additional information you need to know	8
Reporting	11
Further information	12

Overview

Managing an investment portfolio today is a full-time job, and the ever-increasing complexities of the taxation system make accurate record keeping essential. Our Portfolio Management Service (PMS) provides you and your adviser with a record-keeping facility that takes the headache out of managing your investments.

Available only through a licensed financial adviser, the PMS is our complete portfolio management service that provides you and your adviser with comprehensive portfolio reporting helping you to make informed decisions. You and your adviser can access information and reports on your portfolio at any time. You can view all this information via one convenient online portal – AET My Portfolio (aetmyportfolio.com.au) – 24 hours a day, seven days a week.

Ideal for SMSF trustees, private unit trusts, family trusts and individuals, the PMS gives you the best of both worlds; your financial adviser retains a direct relationship with you and you have the benefit of administrative help from us – we handle all your portfolio record keeping.

We will take all reasonable steps to ensure the information recorded on the PMS is complete and correct. However, in providing this service, we must rely on the data provided by external parties. We cannot, therefore, make any warranty as to the availability, completeness and accuracy of any information that has been received from external parties or produced by us having relied upon the data of those parties.

Features

The PMS can be customised to suit your specific circumstances. Working with your financial adviser you can choose either a select investment menu that offers custodial investing only or an unrestricted investment menu that offers both custodial and own name investing. Because of the nature of the investments available, the administration fee that applies to the unrestricted investment menu is higher.

For further information, please refer to the PMS profile available on AET My Portfolio.

1. Investment menus

Select investment menu	Unrestricted investment menu
Ownership: Custodial only	Ownership: Custodial or own name
Investments available: <ul style="list-style-type: none"> • IOOF MultiMix Trusts. • ASX listed securities including direct shares, exchange traded funds and hybrid securities. 	Investments available: <ul style="list-style-type: none"> • Wholesale managed funds. • Retail managed funds upon application (including IOOF MultiMix Trusts). • ASX listed securities including direct shares, exchange traded funds and hybrid securities. • Term deposits. • Unlisted investments. • Private assets including property.

2. Investment ownership

a) Custodial ownership

Under a custodial ownership arrangement, we have custody of your investments but you retain the beneficial ownership. All investments are legally held by us in the name of AET in trust for you, not in your name. We will manage all the share registry paperwork on your behalf and you will generally not receive any direct communications from the underlying investment managers. By holding assets in trust on your behalf, we will:

- act on instructions received
- settle transactions
- collect income for assets
- provide safe keeping of assets
- attend investor meetings and vote (as you will not be able to do so yourself). We may lodge a proxy vote on your behalf (but are not obligated to do so) if your financial adviser instructs us to

- allow you to participate in the majority of corporate actions. Participation may not be offered for some corporate actions, such as discount card offers.

b) Own name ownership

As the legal and beneficial owner of the investments, all assets (except wholesale funds and those that are held by the margin lender) are held in your name directly. Assets can be added to, or removed from, a portfolio without the need for a formal change of ownership (except for wholesale funds which are held under a custodial arrangement).

3. Choice of broker

You and your financial adviser are free to buy and sell listed investments and can trade with the broker of your choice. Your financial adviser can also trade online through AET My Portfolio using our preferred broker.

4. Daily administration with consolidated reporting

When it comes to transacting, all of your transactions will be settled through a Cash Account and this alleviates the need for you to rely on, or supply data to, numerous other service providers. Your Cash Account will be fully integrated with the investment portfolio administration we provide and, as a result, using our online portal – AET My Portfolio – you are able to view accurate reports and statements that show the true position of your account at any point in time. Subject to sufficient funds being available in your Cash Account, you are free to select and manage your investments.

AET My Portfolio gives you and your adviser online access to your portfolio – all your portfolio information is available at your adviser's fingertips. Reports can be generated for your portfolio enabling your adviser to keep a close watch on your investments. You can also see corporate actions and maturing investments.

5. Margin lending

We have partnered with a number of margin lending providers so you can gear your portfolio against wholesale funds. Margin lending is only available to own name investment accounts. The listing of approved lenders is available by calling AET ClientFirst on 1800 254 180. To find out more about margin lending, including fees and charges, current interest rates as well as information on how to reduce risks, please speak to your financial adviser.

Things to consider about investing

Before you do any investing there are certain things you need to consider.

Neither we, nor any of our related companies, guarantee the capital value, payment of income or performance of your investments.

What are the risks?

All investments carry some risk. If you leave the PMS shortly after joining, or switch out of an investment option shortly after selecting it, you could get back less than the amount put in because of the level of investment returns and the effect of fees, costs and taxes.

Other key risks that may adversely affect your investment in the PMS include the possibility of negative investment returns, insufficient investment diversification and changes to taxation law.

There are investment risks that may affect the investment options you choose, like market risk or credit risk as well as the general risks associated with changing economic conditions. In the case of a restricted investment, your ability to make a lump sum withdrawal may be delayed, reduced or unavailable until sufficient assets from that investment can be redeemed to fund the withdrawal.

There are also non-investment risks for investments through the PMS such as system failures and delays if we do not receive properly completed and authorised instructions from you.

How can investment risk be reduced?

An important way to help reduce your investment risk is to spread your investment over a number of assets, asset classes and even different investment managers. This process is called diversification. It is designed to help you achieve more consistent investment returns over time.

The PMS offers you a choice of investment options across all the major asset classes. When determining your investment strategy, this choice allows you to create a level of diversification in your investment portfolio.

A financial adviser can help you understand the various types of investment risk and assess which investment options are appropriate for your specific requirements by considering your risk tolerance and risk/return investment objectives.

The role of your financial adviser

Our service is designed to work in conjunction with your financial adviser. If you do not have one you will need to appoint one.

Your financial adviser will help you formulate an appropriate investment strategy. They will receive information about your portfolio and give us investment instructions on your behalf. They will also have the power to provide us with instructions in relation to:

- buying or selling investments through us
- buying or selling investments through third parties
- corporate actions
- your required regular payments.

As part of your application, you will indemnify us for the actions of your appointed financial adviser. Your financial adviser's authority does not authorise them to do any of the following without your signature:

- change the name or address of your portfolio
- change the banking details of your portfolio
- change any fee or cost that applies to your portfolio.

If you need help, have any questions or need further information regarding your portfolio's investments, please speak to your financial adviser.

Adviser remuneration

Adviser service fee

The adviser service fee is remuneration paid to the Australian Financial Service Licence (AFSL) holder of your financial adviser for the personal advice they provide you in relation to your portfolio. The amount you pay as an adviser service fee is subject to negotiation between you and your financial adviser and is separate to the fees outlined in the PMS profile.

You and your financial adviser can select the most appropriate remuneration arrangement from the following fee payment options:

- Advice Fee – Ongoing
- Advice Fee – Fixed Term Arrangement
- Advice Fee – One Off

While you may agree to one or more of these options, you and your financial adviser must agree on the amount of each member advice fee.

The agreed adviser service fee may be either a percentage of your account balance or a specified dollar value. Each month, this amount will be deducted from your portfolio's Cash Account and paid to the AFSL holder of your financial adviser.

Any arrangement you have should be detailed in the statement of advice provided by your financial adviser.

Advice Fee – Ongoing

We deduct the net cost from your Cash Account as instructed by you. We then pay the full amount of the fee to your financial adviser for the ongoing financial advice and services they provide to you in relation to your fund.

Where the fee is a percentage-based fee the amount of this fee is calculated on the net value of your fund on the last day of the month and is deducted from each member's account monthly in arrears.

Whilst the Advice Fee – Ongoing can continue indefinitely, we will require your consent to continue the fee every year. Your financial adviser will arrange for this annual renewal each year. If we do not receive your consent by the 'consent end date' as advised when the fee was established or last renewed, your Member Advice Fee – Ongoing will cease.

Advice Fee – Fixed Term Arrangement

You and your adviser may agree for a fee to be charged for financial advice services that are to be provided within a fixed period. An Advice Fee – Fixed Term Arrangement (FTA) will have a specified start date and end date, where the end date cannot be more than 12 months from the start date. The fee can be calculated based on the value of your account and/or a fixed dollar amount for the period.

Where the fee is a percentage-based fee the amount of this fee is calculated on the value of your account on the last day of the month and deducted monthly in arrears.

Note: You cannot elect to have an Advice Fee – Ongoing at the same time as an Advice Fee – FTA. Your account can only have one active FTA at any time.

You must sign the FTA within 90 days of the start date, and the FTA must be received within 90 days of the date signed.

The FTA start date cannot be backdated, as such if the start date is prior to the processing date, then the FTA will start on the date that it is processed.

Advice Fee - One Off

We deduct the net cost from your Cash Account as instructed by you. We then pay the full amount of the fee to your financial adviser for the one-off financial advice and services they provide in relation to your fund.

A new request must be supplied each time you would like this fee to be applied.

What happens if you change your mind in relation to adviser fees?

Should you wish to revoke your consent to the deduction of any adviser fees, please contact us and/or your financial adviser to terminate the adviser fee arrangement. Note this will prevent any further deduction of Advice fee - ongoing from your account after the consent has been revoked, but does not reverse any fees paid before revocation. We will also confirm with you or your financial adviser whether to remove the financial adviser's access to your account.

Getting started

Before you make a decision to establish a PMS portfolio, or transfer an existing portfolio to us, you should read this investor brochure and the PMS profile carefully and obtain professional advice.

Establishing a new portfolio

Getting started is easy; you and your financial adviser just need to follow the steps below:

- 1 Read and consider this investor brochure and the PMS profile.
- 2 Together with your financial adviser, choose an investment menu (select investment menu or unrestricted investment menu) as well as the investment ownership structure (custodial or own name).
- 3 Complete the application forms. If you wish to invest in any managed fund listed on the AET Wholesale Access Fund (WAF) Product List, you must read the WAF IDPS guide and complete the WAF IDPS application form that is available on AET My Portfolio.
- 4 In line with the *Anti-Money Laundering/Counter-Terrorism Financing Act 2006* (AML/CTF Act), the *Foreign Account Tax Compliance Act* (FATCA) and Common Reporting Standard (CRS) all signatories on the account will need to provide proof of their identity and declare if they are a United States citizen or resident for tax purposes. You and your financial adviser will need to complete the appropriate identification form that is available on AET My Portfolio.
- 5 **Send your completed forms to us:**
Australian Executor Trustees Limited
AET ClientFirst – New Business
GPO Box 546
Adelaide SA 5001

Once we have received your completed forms, we will establish your portfolio and send you a welcome letter confirming your portfolio's details, including your portfolio's direct bank details so that funds can be transferred electronically.

Transferring an existing portfolio

Transferring an existing portfolio is easy; you and your financial adviser just need to follow the steps below:

- 1 Read and consider this investor brochure and the PMS profile.
- 2 Together with your financial adviser, choose an investment menu (select investment menu or unrestricted investment menu) as well as the investment ownership structure (custodial or own name).

- 3 Complete the application forms. If you wish to invest in any managed fund listed on the WAF Product List, you must read the WAF IDPS guide and complete the WAF IDPS application form that is available on AET My Portfolio
- 4 In line with the requirements of the AML/CTF Act, FATCA and CRS all signatories on the account will need to provide proof of their identity and declare if they are a United States citizen or resident for tax purposes. You and your financial adviser will need to complete the appropriate identification form on AET My Portfolio. We may require additional forms to be completed depending on the nature of your investments.
- 5 Complete the 'Moving assets into your PMS' form available on AET My Portfolio and supply the original holding statements/certificates confirming the registration.
- 6 **Send your completed forms to us:**
Australian Executor Trustees Limited
AET ClientFirst – New Business
GPO Box 546
Adelaide SA 5001

Once we have received your completed forms, we will establish your portfolio and send you a welcome letter confirming your portfolio's details, including your portfolio's direct bank details so that funds can be transferred electronically. Standard transfer forms and change of address letters for all assets that you are transferring to us may be requested where applicable.

Adding to your account

You can make deposits via electronic funds transfer or cheque.

Accessing your money

You can request a partial withdrawal from your portfolio by completing the withdrawal form available on AET My Portfolio.

If you would like to request a full withdrawal from your portfolio, please complete a PMS closure form which is also available on AET My Portfolio.

If you would like to receive regular payments, you can set up a periodic payment facility by completing the 'periodic payment' form available on AET My Portfolio.

Additional information you need to know

Cash Account

As part of your application, you authorise us to establish an operational Cash Account for you. This Cash Account is opened in the name of the portfolio and is used to credit your application monies, receipt your portfolio's investment income and any other monies deposited as well as pay your portfolio's withdrawals and expenses.

Your Cash Account holding is pooled with that of other clients' and placed in interest bearing accounts with an authorised deposit-taking institution (ADI), the National Australia Bank Limited, ABN 12 004 044 937.

The funds in your Cash Account earn interest. We retain a portion of the interest earned on the pooled cash assets and set a net interest to be credited to the Cash Account. The net interest rate is based on daily interest generated from the pooled cash assets, less the interest retained by us¹ (indirect cost) for administering the Cash Account.

The target net rate for crediting to the Cash Account is the cash rate set by the Reserve Bank of Australia. This is often referred to as the official cash rate. Net interest is credited to your Cash Account monthly.

Using your Cash Account

We will use your Cash Account to process all of your portfolio's expenses and receipt of all of your portfolio's income.

All transactions will be reconciled daily and can be viewed through AET My Portfolio.

Each portfolio's Cash Account must maintain the following minimum balance at all times:

Portfolio balance	Minimum cash requirements
< \$1 million	\$5,000
\$1 million +	0.5% of portfolio balance

We reserve the right not to complete a transaction for you if there are insufficient funds available in your Cash Account and we reserve the right to reverse out any transaction that overdraws your Cash Account, at your portfolio's expense.

Buying and selling investments

The investments you can buy will depend on whether you choose the select investment menu or the unrestricted investment menu.

Instructions regarding all buys and sells are given to us by your adviser and we carry out the transactions on your behalf.

Shares

You and your financial adviser are free to buy and sell listed investments. Your financial adviser can trade through our online portal – AET My Portfolio – using our preferred broker or with your preferred broker. Simply by providing us with your instructions, we will settle the trade from your portfolio's Cash Account, providing there is sufficient cash available, (subject to the minimum cash requirements as detailed in the table above being maintained) and receive and hold all contract notes on behalf of your portfolio.

Custodial investment ownership

Account name: <ACCOUNT NAME>
C/- Australian Executor Trustees Limited
<ACCOUNT NUMBER>

Address: Australian Executor Trustees Limited
GPO Box 546
Adelaide SA 5001

Account set up: Delivery Versus Payment (DVP)

Participant ID: 20120

Own name investment ownership

Account name: <ACCOUNT NAME>
C/- Australian Executor Trustees Limited
<ACCOUNT NUMBER>

Address: Australian Executor Trustees Limited
GPO Box 546
Adelaide SA 5001

Account set up: Issuer Sponsored or Broker Sponsored

Note: we do not permit the use of external cash management trust accounts and require all settlement transactions to be settled through our Cash Account.

1 - Cash Account underlying assets are subject to change from time to time.

Brokerage

Brokerage fees may be payable to your broker or your financial adviser for undertaking a transaction for the acquisition or disposal of a listed security. The rate payable will vary depending on the broker you select, and can be a flat rate or a percentage of the transaction. Any brokerage fees are an additional cost to you. They will be payable on completion of the transaction from your portfolio's Cash Account.

There may be additional fees payable for trades that do not complete and you may be charged for these. This could occur where you or your financial adviser incorrectly places a trade for your portfolio or where your portfolio holds insufficient cash to settle the trade.

Brokerage fees for trading through our preferred broker via AET My Portfolio are outlined in the PMS profile available on AET My Portfolio.

Managed funds

The managed funds you will be able to access will depend on whether you choose the select investment menu or the unrestricted investment menu.

Select investment menu

If you choose the select investment menu, you will have access to:

- the suite of IOOF MultiMix Trusts (a full list of the trusts is available on AET My Portfolio).

Unrestricted investment menu

If you choose the unrestricted investment menu, you will have access to:

- wholesale managed funds available through our WAF
- retail managed funds upon application (including the suite of IOOF MultiMix Trusts).

Note: we do not permit the use of external settlement services relating to managed funds. All requests must be directed to AET.

When considering an investment in a managed fund, you should take into account that different funds have different investment management fees. Before making any decisions, please read the PDS for the investment option and consult your financial adviser.

Buy-sell spreads for managed funds

If you invest in managed funds, a buy-sell spread may apply. A buy-sell spread is the term used where there is a difference between the purchase and sale price of a managed fund. This fee is not charged to you separately, it is reflected in the unit price of the relevant managed fund. Buy-sell spreads are an additional cost to you. Information about the buy-sell spread is included in the PDS for the relevant managed fund.

Private assets

Generally, we consider private assets as those investments within your portfolio that are not priced daily and which we do not hold for you under a custody arrangement such as:

- direct residential and commercial properties
- business real property
- separately managed accounts
- individually managed accounts
- private unit trusts
- collectables
- structured products.

We will record your portfolio's private assets based on the value you provide us, receipt any income received and pay any expenses due, from your Cash Account. The reporting we prepare for your portfolio will include your private assets.

Your financial adviser will place all transactions for you in relation to your portfolio's private assets and we will settle the transactions via your portfolio's Cash Account.

Term deposits

We offer a variety of term deposits and process purchase instructions daily. Applicable rates are published on AET My Portfolio daily.

Generally, early redemption of these investments is not available except in exceptional circumstances where the institution may impose a fee.

Assets held in custody

If you elect to appoint us as the custodian of your assets, we will, in our capacity as custodian:

- hold Australian listed shares and managed funds in trust on behalf of the portfolio and act on instructions received from you or your financial adviser
- keep portfolio account assets distinct and separate from our own assets
- be prohibited from placing a charge, mortgage or any other encumbrance over any of the portfolio's assets
- accept responsibility for any liability arising from our failure to exercise reasonable care based on the standard applicable to custodians
- endeavour to comply with all relevant laws when dealing with the assets held in your portfolio.

Note: please complete the relevant section on the application form to confirm how you wish your assets to be held.

Income collection and payment

To ensure the integrity of our reporting, we collect and process all income and share or unit entitlements. This requires each share registry or fund manager to be informed that documentation relating to your investments should be sent to us. If you wish, we will prepare standard transfer forms or change of address letters.

All financial transactions (including income distributions, asset sales and purchases, government charges and management fees) are processed through your portfolio and reported in the Cash Account component of your statement. You and your adviser are able to view transactions on AET My Portfolio and obtain a report at any time.

Corporate action events

When decisions need to be made about corporate action events such as new issues or takeovers of entities in which you invest, we will notify your adviser of your entitlements. Your adviser should consult with you and will provide instructions to us.

Capital gains tax records

We will process all asset entitlements, dividend and unit trust reinvestments, bonus or new issues, calls and reconstructions for capital gains tax (CGT) purposes.

Reporting

Quarterly statements

For each quarter a quarterly statement will be uploaded to AET My Portfolio.

The four statements are described below:

- **Portfolio valuation report** – you are able to access the market value of any asset within your portfolio, as well as cost details, for any given date. This provides an additional tool to help your adviser analyse your portfolio performance.
- **Unrealised capital gain/loss report** – CGT is an important consideration in every asset sale or redemption. This report provides you with a projection of any nominal capital gain, indexed capital gain and any discounted capital gain. To help you offset any capital gains, capital losses are reported separately. In generating these figures, the impact of any tax-free or tax-deferred distributions for unit trusts is considered. Information is provided at an asset level; however, if there is more than one acquisition for a particular asset, the gain or loss for each acquisition can be projected separately.
- **Income and expense summary** – provides a summary of all receipts and payments processed for a nominated period.
- **Cash Account statement** – this provides details of all transactions that have been processed through your account for the statement period.

If you would like us to mail you a hard copy of these reports you can contact AET ClientFirst on 1800 254 180.

Other reports available online

Our secure website, AET My Portfolio, is accessible 24 hours, seven days a week and provides you and your adviser with an extensive range of other reports.

End-of-year tax reports

At the end of each financial year, and after we have received all of the relevant tax information about unit trust income from the fund managers (if applicable), we will upload the following reports (to assist with the preparation of your income tax return) to AET My Portfolio:

- 1 Tax income and expense summary which outlines all of the investment income information as well as any deductible expenses.
- 2 CGT sales report which outlines all of the CGT information such as:
 - gains or losses that have arisen from the sale of assets that are subject to CGT
 - the separate listing of each acquisition, including income reinvestments
 - automatic consideration of the impact of tax-free, tax-deferred income and cost base adjustments (if applicable) as well as indexation and/or discounting
 - new issues, bonus issues and takeovers.
- 3 Sale of traditional securities (if applicable).

If you would like a hard copy of these reports, please contact AET ClientFirst on 1800 254 180.

In addition to the above reports a 'Guide to tax statements' will also be available on AET My Portfolio.

If you wish to invest in managed funds and have signed up to the WAF IDPS we will send you a hard copy of the WAF annual audit report and a copy of your PMS annual statement or Attribution Managed Investment Trust (AMIT) Members Annual Statement.

Audit report

At the end of each financial year an audit report will be available on AET My Portfolio. The audit report will provide you with the auditor's opinion relating to our accounting procedures and internal controls affecting the accuracy of your annual statements.

Further information

Fees

The fees payable for the service are disclosed in the PMS profile that is available on AET My Portfolio.

By signing the PMS application form, you authorise us to deduct those fees from your account.

The fees applying to the PMS may include:

- an ongoing administration fee payable to us for providing the PMS service
- an asset loading fee payable to us for transferring existing assets to your PMS portfolio on establishment
- an asset transfer fee payable to us for transferring assets out of your PMS portfolio on closure
- a private asset fee for administering private assets in your PMS portfolio, and
- an initial and/or ongoing adviser service fee payable to your adviser.

Ongoing fees are charged monthly in arrears based on the portfolio value on the last day of the month.

These fees may be tax deductible.

Other fees and charges

Other fees or charges may be payable on the investments within your portfolio. Examples include, but are not limited to, wholesale entry fees and transaction costs for the investments that you choose.

Expenses properly incurred by your portfolio are payable by your portfolio. These are not payments to us. Examples include, but are not limited to, stamp duty, goods and service tax (GST), CHESS tariffs or government charges.

Varying fees

The fees outlined in the PMS profile are subject to change. You will be provided with 30 days' notice of any changes.

Tax invoices

Your adviser can request a tax invoice incorporating all the fees payable to us and your adviser from your PMS account for a nominated period.

AET My Portfolio access

To obtain access to AET My Portfolio please complete the 'AET My Portfolio access' section in the application form. Your personal login ID will be emailed to you and your password will be emailed to you separately.

If you opt-out of access to AET My Portfolio, please consult your financial adviser or call us and we will send you copies of your quarterly and annual statements when required.

Privacy

We are committed to protecting your privacy. Any personal information we collect about you will be handled in accordance with our privacy policy, which outlines how we manage your personal information, how you may access or correct your personal information, and how you may complain about a breach of your privacy. To obtain a copy of the Insignia Financial Group privacy policy, please contact AET ClientFirst on 1800 254 180 or visit our website (www.aetlimited.com.au/privacy).

We collect your personal information from the Application form you complete when applying for this product for the purpose of providing you with the products and services that you request and for related purposes, including providing you with financial advice and ongoing services in relation to your account with us, or providing information about other products and services that may be of interest to you. If you do not provide all the information requested in your Application form, we may not be able to process your application.

To verify your identity for Know Your Customer purposes, we may also solicit personal information about you from reliable identity verification service providers. For the purpose of providing you with the products or services you have requested, we may disclose your personal information to our related bodies corporate or external parties, including your financial adviser or employer, banks or other financial institutions, medical professionals, insurers, legal or accounting firms, auditors, mail houses, or when required or authorised to do so by law. It is generally unlikely that we will disclose your personal information overseas. However, any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with Australian privacy laws.

Anti-money Laundering/Counter-Terrorism Financing legislation

We are required to carry out proof of identity procedures for investors opening a PMS account on an investor's behalf, such as an attorney, or an appointed guardian for an investor. Our obligations regarding ascertaining proof of identity for an investor arises under the Commonwealth Government's AML/CTF Act. Further details of our requirements are set out in the PMS application form that you must first read and complete in order to become an investor in the PMS.

You must provide us with all information and documentation we reasonably require in order for us to:

- 1 confirm your identity or the identity of any other person related to the account or service;
- 2 manage money laundering, terrorism-financing or economic and trade sanctions risk;
- 3 comply with any laws in Australia or any other country.

Foreign Account Tax Compliance Act and Common Reporting Standard

Australia participates in Automatic Exchange of Information (AEOI) under the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS) which require financial institutions, including the PMS, to identify and report information relating to investors who are a resident of a foreign jurisdiction for tax purposes. This information is reported to the Australian Taxation Office (ATO) and will be exchanged with other participating countries. We are required by this law to ask investors who may be a foreign resident for tax purposes to supply additional identification and tax information to us.

Foreign taxes

Investments may be affected by foreign tax laws, which can reduce the amount you receive. Under some foreign laws you may be subject to additional obligations if you have a connection with a foreign country (for example by birth, residence, citizenship or property ownership).

Complaints and dispute resolution

If you have a complaint (or wish to obtain further information about the status of an existing complaint), please contact AET ClientFirst on 1800 254 180 or write to AET ClientFirst, GPO Box 546, Adelaide SA 5001.

We will provide you with all reasonable assistance and information you may require for the purpose of making a complaint and assist you in understanding our complaints handling procedures.

You have the option to lodge a complaint with AFCA directly rather than lodging a complaint with us. Otherwise, you can also lodge a complaint with AFCA if you are not satisfied with our response or if your complaint has not been resolved within the maximum timeframe prescribed by ASIC's Regulatory Guides (RG 271). AFCA provide a fair and independent financial services complaint resolution that is free to consumers. Time limits may apply to complain to AFCA. Please act promptly and consult the AFCA website to find out if or when the time limit relevant to your circumstance expires.

Website: www.afca.org.au

Email: info@afca.org.au

Tel: 1800 931 678 (Free call)

Mail: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

ASIC Corporations (Nominee and Custody Services) Instrument 2016/1156

As at the date this investor brochure was prepared, we comply with the ASIC Corporations (Nominee and Custody Services) Instrument 2016/1156 (as amended from time to time).

