Investment Strategy

Camilleri Colbourne Superannuation Fund

Background:

The investment strategy outlined below represents an expansion and clarification of the Investment Strategy agreed at the formation of the Camilleri Colbourne superannuation Fund ("the Fund"). This Investment Strategy replaces the Investment Strategy document dated 10 June 2015.

Objectives:

The objective of the fund is to:

- Provide superannuation benefits to members and their dependants to meet their retirement needs.
- Ensure that appropriate mixes of investments are held by the fund to support these needs
- Ensure the fund has sufficient liquidity at all times to meet all commitments
- Maximise the tax effectiveness of fund investments thereby delivering the best long term after tax return for members.

The Investment objective of the trustees is to aim to achieve real medium to longer-term growth. In recognition of the 10 -15 year investment time frame of members the fund will have a high proportion of growth and property based assets in the portfolio.

Investment Choice:

The Trustees have determined the fund's investments may include but not be limited to all or one of the following:

- Direct equities, stocks and derivatives including participation in dividend reinvestment programs and right issues, including the use of geared instalment warrants:
- Property trusts and associated investments:
- Managed investments and associated products:
- Direct residential, industrial and commercial property investment [including geared property investments purchased using allowable limited recourse borrowing arrangements]:
- Deposits and investments with banks and other financial institution securities including Term Deposits, Debentures, Secured and Unsecured Notes and Bonds:
- Any other investment that the trustees may feel prudent to achieve the objective of the fund.

The Trustee may from time to time decide to seek professional advice from Accountants, Solicitors or Financial Planners in the formulation or implementation of this or any future investment strategy.

In formulating this strategy the trustees have taken into consideration relevant features of the various investments in accordance with both the fund's objectives and appropriate legislation.

In drafting this investment strategy, the trustees have taken into account all of the circumstances of the fund, including:

- the risks and likely return associated with each investment;
- the range and diversity of investments held by the fund;
- any risks coming from limited diversification;
- the liquidity of the fund's investments;
- the ages and preferences of its members;
- expected cash flow requirements; and
- the ability of the fund to meet its existing and prospective liabilities such as paying benefits to its members.

Policies:

The policies adopted by the Trustees in order to achieve these objectives are:

- Regular monitoring of the performance of the fund's investments, the overall investment mix and the expected cash flow requirements of the fund.
- Re-balancing the fund's investment portfolio due to changes in market conditions through asset sales and new investments as appropriate.

The Trustees will aim to follow the investment strategy, however, they will at all times reserve the right to change the investment mix depending on the market situation and opportunities available to better meet the objectives of the fund.

A copy of the Investment Strategy of the fund will be available to members of the fund on request.

Risk profile and risk tolerance:

The Fund has a medium time horizon. Further the members are prepared to endure a reasonable level of volatility of returns in expectation of long term growth. The members have existing equity and property investments outside superannuation and are familiar with the variability of both returns and capital values which are associated with such investments.

Members understand

- the trade-off between investment risk and long term capital and income growth and have indicated asset growth is a priority
- Investment risk is borne by the members, as fluctuations in investment returns will affect the level of benefits available to members.

Geared Investments:

The Trustees have elected to purchase direct residential property using limited recourse borrowing arrangements. The Trustees have indicated they understand and are prepared to accept the increased volatility of returns associated with borrowing to invest, including the risk of loss, including the risk of total loss of invested assets where such assets are subject to limited recourse borrowing arrangements

Single Asset Strategy

The Trustees recognise the higher risk in investing predominantly in growth assets (particularly as a very large portion of the fund's assets are invested in a single property) and the volatility associated with shares and property. The volatility will be compensated by the prospect of achieving higher return and growth in the longer term.

Specialised higher risk assets

The Trustees have elected to invest up to 5 % of the fund's assets in High risk start up businesses. The Trustees understand and are prepared to accept the increased risk associated with these investments and the loss of liquidity normally available via listed/traded investments, including the risk of loss, including the risk of total loss, in order to earn the higher returns potentially available to investors. Furthermore, Trustees understand they are investing as wholesale investors and will have minimal protection in the event of failure of the underlying investments. Trustees understand they will not have the benefit of normal investor protections such as audited accounts.

Insurance:

The Trustees have considered whether the Fund should hold a contract of insurance for its members and concluded that:

- Additional insurance is not deemed appropriate as the members have significant assets inside and outside superannuation
- The members have appropriate insurance outside the fund via an insurance policy provided by the employer of the member

Liquidity:

The Members of the Fund are aged 49 & 56 and have significant property based assets outside of superannuation. At the present time neither expect to access their superannuation prior to age 65. Accordingly there is no anticipated benefit payment in the next 11 years. Cash in excess of anticipated liquidity requirement will be invested in accordance with the Fund's investment strategy.

Asset Allocation:

The targeted asset allocation takes into account the benefits of a diversified asset mix, however, given the investment time horizon of the fund (which is based on the members life expectancies) and the members significant assets outside of superannuation, the allocation will be focused on maximising capital growth. The Trustees recognise the higher risk in investing predominantly in growth assets and the volatility associated with shares and property. The volatility will be compensated by the

prospect of achieving higher returns and growth in the longer term. In order to minimise this risk Trustees will consider investing in different industries and sectors where possible.

The final targeted asset allocation will be in the following ranges:

Growth Assets	Indicative long term range
 Australian listed equities 	10-20%
 International listed equities 	5-10%
 Australian listed property funds 	5-10%
 Property 	60-90%
High risk start up companies	Upto 5%
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Russell Colbourne

Trustee Camilleri Colbourne Superannuation Fund

1st July 2019

Maria-Ann Camilleri

Trustee Camilleri Colbourne Superannuation Fund

1st July 2019