TC SULLIVAN SUPER PTY LTD FUND AS TRUSTEE FOR TC SULLIVAN SUPERANNUATION FUND

Objective

This investment strategy of the fund (as amended to from time to time) is created in compliance with the Superannuation Industry (Supervision) Act 1993 (Cth).

The Fund is a superannuation fund that:

- 1. accepts employer and member contribution and contributions from other persons as the laws allow;
- 2. performs other activities as allowed by the laws and regulations from time to time;
- 3. provides benefits to members upon retirement;
- 4. accepts transfers from other Superannuation funds;
- 5. allows full access to any unrestricted non-preserved benefits (as allowed by the laws and regulations as amended from time to time); and
- 6. provides for the payment of pension benefits at a rate as determined in the future from time to time.

Compliance of the Fund

The fund complies with the current laws and regulations and the rules in the trust deed.

The fund has the investment objectives as outlined below.

Risk and Rate of Return

The Trustee(s) recognise and accept that:

- 1. The timing (that is, when you get into the investment), and time in the investment (that is, how long you are in the investment) affects the returns.
- 2. There is a risk that losses can be made with the fund.
- 3. Different investments have different returns and volatility.

The Trustee(s) has a strong emphasis on preserving the fund's capital. However, the Trustee(s) understand that many sound investments are not capital guaranteed.

Therefore, the security of capital must be weighed up against the need to achieve the desired rate of return. The Trustee(s) are ever vigilant to balance these two objectives: protecting the capital and growing the value of the fund by obtaining an acceptable rate of return. So assets that are more volatile (and therefore more risky) may be of benefit to the fund to increase returns.

In particular, derivative trading and purchase of high income yield investments in the fund is an important reason behind setting up the superannuation fund.

Diversity of the Member's Fund

The Trustee(s) has the view that diversification, holding a number of investments, is essential. This reduces diversity and risk of total collapse.

That said, diversification is only one factor to be considered. It may be more prudent, in some circumstances, to put the bulk of superannuation monies into a particular investment if the risk/return ratio deems it to be worthwhile.

The Trustee may, in writing, change the spread of investments. This can be done on an annual, weekly or even a daily basis if appropriate.

The fund's current investment spread is, at the date of this strategy:

Asset Allocation (%)		Range (%) e.g. 0 – 100%
Cash	0 –	100%
Australian Fixed Interest	0 –	100%
International Fixed Interest	0 –	100%
Australian Equities (Current Benchmark: S&P ASX 200)	0 –	90%
International Equities (Current Benchmark: MSCI World Ex \$A)	0 –	90%
Diversified Property (other than residential)	0 –	0%
Residential property, either direct or in a unit trust	0 –	0%
Derivative Trading	0 –	0%
Other investments	0 –	90%

Required Rate of Return

The Trustee seeks an overall investment return for the fund in the 3–5 year term (medium term) of 3% above the average rate of inflation over that period.

Trustee's Obligations

The Trustee ensures that the fund meets the legislated standard minimums to continue to obtain concessional taxation status on the income.

It is also incumbent on the Trustee to consider the tax consequences of all investments. Tax-advantaged products may reduce the fund's taxation burden. Tax is one of the Trustee's relevant concerns.

The Trustee acknowledges that members' benefits are a liability of the fund. The Trustee has to give thought to the level of benefit required to be paid to the member. However, no terminations or benefits are expected to be paid out in the short to medium term. Therefore, the Trustee will continue to examine investments that are medium term.

Paying Debts

The Trustee is obliged to pay tax, expenses and benefits. It will do so within 31 days. The Trustee ensures that it holds sufficient cash to meet such obligations. Moneys must also be kept in reserve to meet the risk and reward objectives of the fund.

Cost of Investing

The Trustee strives to reduce costs of investing. However, at times upfront investment costs are payable in order to obtain the best investment products that fit into this investment strategy. Exit costs and penalties may also be part of the cost of carrying out this investment strategy.

Investing

Cash

The fund can hold cash at any time. Money can be held in kind, in banks, building societies, lending institutions and cash management accounts at the discretion of the Trustee(s).

Australian Fixed Interest

These include deposits banks, building societies, lending institutions, cash management accounts, government and non-government bonds, bank bills, debentures, corporate notes and specialist fixed interest funds.

Property

This includes buying residential or commercial property through appropriate structured investments, and direct and indirect investments in listed and unlisted property trusts and property securities funds.

Australian Shares

These include listed and unlisted securities including shares, warrants and managed funds.

International Shares

These include investments directly or indirectly in listed and unlisted shares from all over the world.

Review

The Trustee(s) may review this strategy as the Trustee(s) deems fit. However, the Trustee(s) shall, at the very least, do an annual review.

By authority of the Trustee

Signed Timothy Charles Sullivan (Director) Date 01/07/2019

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Date 01/07/2019