

INVESTMENT STRATEGY

Guidance Statement

THE TINY HOLDINGS SUPERANNUATION
SCHEME

THE TINY HOLDINGS SUPERANNUATION SCHEME (“The Fund”) INVESTMENT STRATEGY

1. The Fund and its Investment Strategy

Once a SMSF is established the Trustee of the Fund must put in place an investment strategy. In addition that investment strategy must be in writing and reconsidered or ratified regularly. In particular, section 55B(2)(f) of SISA requires that all investments of the Fund are made according to the Fund’s investment strategy – essentially the plan the Trustee is required to make before investing for the Fund. Any investment outside the Fund’s investment strategy may render the Trustee liable for a fine at best and being sued by the members of the Fund for any losses occasioned by investing outside the Fund’s investment strategy.

In making the plan, the Commissioner of Taxation requires there to be an investment objective for the Fund and then a strategy to meet that objective. A typical objective in a large employer fund may be to increase the fund return over a five - year period by the Consumer Price Index + 2%. For a SMSF, which is closely held with related parties an objective should not set a specific benchmark but a goal such as “The objective of the Fund’s investments and investment strategy is to maximise the Fund’s members retirement benefits, including income streams and lump sums, as well as maximising any death benefits if the member’s superannuation benefits are not being used for pension purposes.”

2. The Trust Deed, SISA and Investments

Although the investment objective and investment strategy are quite different in their purpose and use, it is difficult to break them apart. The reason for this is that they are part of a process undertaken by the Trustee to deliver something to a member of the Fund, whether that member is:

- a) taking a pension;
- b) accumulating their benefits in the fund for the purpose of taking a pension;
- c) or seeking to maximise the benefits that may be distributed to their dependants on their death.

The trust deed of the fund should provide details and a process for the Trustee in relation to the Fund’s investment objectives and investment strategies. Even if this is not the case, the SISA provides a set of important rules around these two areas.

3. Trust Deed v SISA

The investment strategy is one instance where the SISA overrides the trust deed — to ensure that the Trustee undertakes investment planning in the Fund. Section 52B(2)(f) and Regulation 4.09 provides that the trustee of a SMSF must formulate, review regularly and give effect to an investment strategy that has regard to the whole of the circumstances of the Fund including, but not limited to, the following:

- a) the risk involved in making, holding and realising, as stated in the law, and the likely return from the Fund's investments having regard to its investment objectives and its expected cash flow requirements;
- b) the composition of the Fund's investments as a whole, including the extent to which the investments are diverse or involve the fund in being exposed to risks from inadequate diversification;
- c) the liquidity of the Fund's investments having regard to its expected cash flow requirements;
- d) the ability of the entity to discharge its existing and prospective liabilities; and
- e) whether the Trustee of the Fund should hold insurance for any member or all members of the Fund.

In addition the Trustee of the Fund may maintain reserves in the Fund, subject to SiSA 93 and Regulatory guidelines. In particular section 52B(2)(g) provides *"if there are any reserves of the fund—to formulate, review regularly and give effect to a strategy for their prudential management, consistent with the fund's investment strategy and its capacity to discharge its liabilities (whether actual or contingent) as and when they fall due."*

4. ATO Guidelines for Investment Objectives and Investment Strategies

The ATO has released important guidelines for trustees of a SMSF and their advisers in relation to investment objectives and investment strategies in the fact sheet Investment Strategy and Investment Restrictions — SMSF. They must be strictly adhered to or the Fund may become a non-complying SMSF. The key principles raised by the ATO concerning investment objectives and investment strategies are:

- a) the trustees of a SMSF are solely responsible and directly accountable for the prudential management of their members' benefits. They can use an adviser, but in the end, it is their responsibility;
- b) as part of this prudential responsibility, the trustees of a SMSF are required to prepare and implement an investment strategy for the superannuation fund;
- c) the strategy must reflect the purpose and circumstances of the fund and have particular regard to the membership profile, benefit structure, tax position and liquidity requirements of the fund;
- d) an investment strategy should set out the investment objectives of the fund and detail the investment methods the trustees will adopt to achieve those objectives;

- e) it is the trustees' duty to make, implement and document decisions about investing fund assets and to carefully monitor the performance of those assets;
- f) the trustees must ensure all investment decisions are made in accordance with the investment strategy; and
- g) breaches of the investment strategy requirement may result in the trustees being fined or sued for loss or damages. In addition, the fund could lose its complying status.

5. The Five Steps to an SMSF Investment Strategy

Step 1: Investment Objective

There are a number of investment objectives that the trustee of the fund can employ on behalf of the fund or member of the fund. In the superannuation industry in general, investment objectives are broad, sweeping statements that pay no reference to specific members of the fund. For example, a common investment objective for a number of retail superannuation funds is "to return on average better than CPI returns".

In relation to the ATO guidelines, this is not appropriate for a SMSF. Membership profile, benefit standards and taxation are just some of the issues that need to be faced by the trustee and their SMSF adviser when building an investment objective.

A suggested investment objective for a SMSF and its Members may be:

"The investment objective to be put in place by the Trustee of the Fund is to maximise the retirement incomes for all Members as well as provide the best possible outcome in terms of death benefits for the Member's Dependants and their Legal Estate."

Step 2: Develop an Investment Strategy — build a Portfolio

Once an objective has been chosen by the trustee — whether the objective is, fund, member or product-based (such as a pension) — the trustee is then required under sec 52B(2)(f) and Regulation 4.09 to prepare an investment strategy to meet the specific investment objective. As discussed, the investment strategy must take into account the whole of the circumstances of the fund, the member's benefit structure, risks involved in holding a specific investment or class of investments, and also the extent that there is risk in the fund's diversification of assets.

An important part of the investment strategy process will be the building of a portfolio. The portfolio development may be undertaken by the trustee, but needs to be well documented. For the most part, a sound investment strategy is generally an important document, and trustees may be well advised to have the process

undertaken by a licensed SMSF investment adviser, skilled at building long-term investment strategies to fund lifetime incomes in a SMSF.

The Trustee of the Fund may seek to invest in property as a long term investment strategy. The Trustee should determine whether diversification is met in the event that property is a significant proportion of the Fund's investments. This is also the case where shares or cash are primarily held as part of the Fund's investments.

Example SMSF Portfolio from "ASX Portfolio Building Case Study@

In terms of portfolio building in a SMSF, the Australian Stock Exchange (ASX) makes the following comments in its Products course.

Most trustees will be suited to an investment portfolio which provides a balance between the relative capital and income stability of fixed interest assets — such as corporate bonds — and the relative growth — with uncertainty of capital and income — offered by shares. As part of this balanced portfolio, other financial instruments such as property investments and commodities such as gold may be included to diversify the risk and return opportunities provided by the portfolio.

Balanced portfolios require ongoing management and rebalancing as economic conditions change, for example, low returns from fixed interest assets may be offset by higher growth opportunities from the share market or property assets or vice versa. Within each asset class, over time, individual sectors or regions may provide higher potential for returns than others and this may be reflected in changing composition of those components of the portfolio.

Shares are perhaps the most dynamic component of the balanced portfolio, as illustrated by the volatility of their individual prices. Volatility is a measure of the degree and frequency of price fluctuation. One of the desired outcomes of the construction of a balanced portfolio is the reduction of overall portfolio volatility with the simultaneous retention of the potential for growth.

In addition to a balanced portfolio, there are numerous other styles of portfolio that may be constructed by a specialist SMSF investment adviser to meet the specific needs of a member's investment objectives. This could range from a defensive portfolio made up primarily of fixed interest securities and cash to an aggressive portfolio consisting primarily of growth assets such as shares and property.

Step 3: Choose an investment style

Part of the strategy according to the ATO is "to detail the investment methods the trustees will adopt to achieve the investment objectives". If the trustee has decided upon a balanced portfolio for the fund, the next step is to look at an asset class and then determine the type of investments that may fill that class.

ASX Equities Strategy

The following comments have also been provided by ASX Limited in its Products course, focusing on investment style in the equities component of a balanced portfolio.

“It is an observable reality that the volatility of a portfolio of shares is typically lower than the volatility of individual shares. Within the component of a portfolio which is allocated to shares, various investment styles may be employed, depending largely on the preferences of the trustee. For example, risk averse trustees may prefer a stable or low growth share portfolio, while younger trustees with an appetite for higher growth and risk may prefer a share portfolio which targets stocks with potential for growth, or those which appear to offer good value — often because they are trading at prices which are below those which have previously prevailed but are considered to be ‘turnaround’ stocks. An ‘intermediate’ style of share portfolio involves a focus on stocks with high proven potential for yield which is often also a measure of economic strength and, hence, yield stocks will often hold their value better than growth stocks.”

Step 4: Choose investment types

Step 4 is the end product of the Fund’s investment strategy and although needed to be documented by the Trustee, that is the acquisition or disposal of the investment, it does not form part of the Fund’s investment strategy.

Pursuant to the Fund’s investment strategy it is a matter of the Trustee or their SMSF investment adviser choosing the type of investment to use. If we reconsider the Fund’s equity portfolio referred to by the ASX (see above) and use an intermediate/growth style, the task is how to fulfil this strategy.

For example, in relation to shares, there are a wide variety of choices including, among others:

- a) domestic equity funds;
- b) international equity funds;
- c) Australian listed equities;
- d) international listed equities;
- e) private equity;
- f) early stage innovation companies;
- g) listed exchange traded funds;

- h) listed investment companies;
- i) hedge funds;
- j) instalment warrants; and
- k) options and warrants.

Although this step may be the easiest, it can also prove to be fundamental to the inherent investment returns of the strategy.

For property investments there are the following styles of investment:

- a) Residential property;
- b) Commercial property;
- c) Industrial property;
- d) Rural property;
- e) Short term letting property.

Step 5: Choose the Investments

Once the type of investment is chosen under the specific asset allocation, the next step for the SMSF adviser is to choose specific investments. This is the most difficult part of the investment strategy. The adviser must spend time researching all the various options available, with a view to meeting the investment objectives for the client in the fund.

6. Insurances in the Fund

The Commissioner has the following to say to Trustees in relation to the Fund's investment strategy and insurances:

“When preparing your investment strategy you're required to consider whether to hold insurance cover for each member of your SMSF.

Your SMSF can generally provide insurance for a member for an event that is consistent with one of these conditions of release of the member's super:

- a) death
- b) terminal medical condition
- c) permanent incapacity (causing the member to permanently cease working)
- d) temporary incapacity (causing the member to temporarily cease working).

Trauma insurance

Trauma insurance typically pays a lump sum if the insured person is diagnosed with a critical illness or injury as specified in the policy, such as cancer, stroke, coronary bypass or heart attack. The lump sum is paid regardless of whether the insured person ceases work or becomes permanently disabled. This is not consistent with one of the conditions of release of the member's super, so SMSFs generally cannot provide trauma insurance for their members.

However, SMSFs can continue to provide trauma insurance benefits to a member if it is a continuation of insurance benefits for that member that existed before 1 July 2014. In this situation the member can vary the level of the cover, and any associated premiums, after 1 July 2014.

To meet the sole purpose test, the following conditions must be met:

- a) any benefits payable under the policy must be paid to a trustee of the SMSF
- b) those benefits will become part of the assets of the SMSF at least until such time as the relevant member satisfies a condition of release
- c) the policy was not acquired to secure some other benefit for another person, such as a member or member's relative.

TRUSTEE MEETING: ACCEPTANCE OF THE FUND'S INVESTMENT STRATEGY

DATE: 16 March 2020

NAME OF FUND: THE TINY HOLDINGS SUPERANNUATION SCHEME

INVESTMENT STRATEGY TO FINISH: INCOME YEAR ENDING 30 June 2020

ATTENDED BY THE TRUSTEE:

BRIAN ROUGHLEY AS A DIRECTOR OF TINY HOLDINGS PTY LIMITED PTY LTD - ACN: 050 055 617 OF 66 THE AVENUE, GRANVILLE, NSW 2142 ACTING AS A TRUSTEE OF THE TINY HOLDINGS SUPERANNUATION SCHEME.

HELD AT: 11 DANIEL STREET, GRANVILLE, NSW 2142.

CHAIRPERSON: BRIAN ROUGHLEY

TRUSTEE: ADOPTION OF INVESTMENT STRATEGY

The Trustee has reviewed the Fund's proposed investment strategy – attached in this minute and has considered the adoption of the investment strategy for the Fund. The purpose of the Investment Strategy is to maximise the Fund's members retirement benefits, including income streams and lump sums, as well as maximising any death benefits if the member's superannuation benefits are not being used for pension purposes. Further the Trustee has reviewed the Investment Strategy for its adherence to the SIS Act and Regulations.

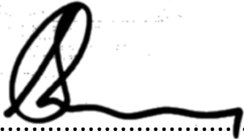
TRUSTEE RESOLUTIONS:

It was resolved by the Trustee:

1. To cease the Funds former investment strategy; and
2. Adopt the current investment strategy – as detailed in this document to take effect from the date of execution of this Investment Strategy meeting until revoked or amended;
3. The Trustee is keep this current Investment Strategy on file for the benefit of Members of the Fund.

SIGNED BY THE TRUSTEE:

TINY HOLDINGS PTY LIMITED PTY LTD – ACN: 050 055 617 of 66 The Avenue, Granville, New South Wales 2142 ATF THE TINY HOLDINGS SUPERANNUATION SCHEME by being signed by the persons authorised to sign for the company pursuant to section 127 of the Corporations Act 2001:



.....
Brian Roughley
Director

16 March 2020

.....
Date

DEED OF RECTIFICATION AND RATIFICATION OF
THE INVESTMENT STRATEGY OF THE TINY
HOLDINGS SUPERANNUATION SCHEME FOR THE
YEARS ENDED 30 JUNE 2019 AND 30 JUNE 2018

DEED OF RECTIFICATION AND RATIFICATION FOR THE INVESTMENT STRATEGY OF THE THE TINY HOLDINGS SUPERANNUATION SCHEME

THIS DEED IS DATED: March 16, 2020

PARTIES:

1. **TRUSTEE:** BRIAN ROUGHLEY AS A DIRECTOR OF TINY HOLDINGS PTY LIMITED PTY LTD - ACN: 050 055 617 OF 66 THE AVENUE, GRANVILLE, NSW 2142 ACTING AS A TRUSTEE OF THE TINY HOLDINGS SUPERANNUATION SCHEME (the “**Trustee**”).

RECITALS:

1. The Tiny Holdings Superannuation Scheme (“**the Fund**”) was established by Deed dated 23 June 1993.
2. Brian Roughley is the current Trustee Director and Member of the Fund.
3. The Trustee of the Fund has previously created an investment strategy, pursuant to the provisions of SIS Regulation 4.09 for the following income years:
 - a. Year ending 30 June 2019
 - b. Year ending 30 June 2018
4. An updated and rectified investment strategy, as prepared by the Trustee is attached to this Deed as the Fund’s formal and hereby rectified and ratified investment strategy for the income years as noted in this Deed.
5. By this Deed the Trustee wishes to rectify the former investment strategy as well as ratify that strategy as the correct investment strategy for the periods as noted above.
6. The rectified and ratified investment strategy is to form part of the Fund’s Governing Rules for the income years as noted in this Deed.

PROVISIONS:

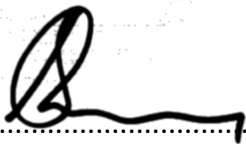
1. **Rectification of the Investment for the Income Years ending 30 June 2019 and 30 June 2018:** The Trustee hereby rectifies the former Fund investment strategy for the years ending 30 June 2019 and 30 June 2018 and hereby attests that the attached investment strategy represents the Fund’s investment strategy for the income years as noted.
2. **Ratification of the Investment Strategy:** The Trustee hereby ratifies that the pre-rectification investment strategies used by the Trustee are to be replaced by the Investment Strategy attached to this Deed and the Trustees further ratify that this

Investment Strategy is the Fund's investment strategy as required under the Fund's governing rules and also the SISR 4.09.

3. **No Resettlement at Law:** Any amendment to the Rules of the Deed effected by this Deed does not result in a resettlement of the Trust at law, equity or under other Law.

EXECUTED AS A DEED BY:

TINY HOLDINGS PTY LIMITED PTY LTD – ACN: 050 055 617 of 66 The Avenue, Granville, New South Wales 2142 ATF THE TINY HOLDINGS SUPERANNUATION SCHEME by being signed by the persons authorised to sign for the company pursuant to section 127 of the Corporations Act 2001:



.....
Brian Roughley
Director

16 March 2020

.....
Date

INVESTMENT STRATEGY

Fund objectives, investment strategy and benchmark allocations

THE TINY HOLDINGS SUPERANNUATION SCHEME

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LAST UPDATED 1 MARCH 2020

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1. INVESTMENT OBJECTIVE

The Fund's investment objective is:

"The Trustee via its investment strategy seeks to maximise the Fund's members retirement benefits, including income streams and lump sums, as well as maximising any death benefits if the member's superannuation benefits are not being used for pension purposes."

2. MEMBER NAME AND SUPERANNUATION INTERESTS

MEMBER	AGE	PENSION	INSURANCE POLICY
Brian Roughley	68	Yes	Yes

3. INVESTMENT STRATEGY

3.1. Background

The Fund's investment strategy is consistent with its objective and seeks to formulate, review regularly and give effect to the investment strategy that has regard to the whole of the circumstances of the fund including, but not limited to, the following:

- a) the risk involved in making, holding and realising, and the likely return from, the Fund's investments, having regard to its objectives and its expected cash flow requirements;
- b) the composition of the Fund's investments as a whole including the extent to which the investments are diverse or involve the fund in being exposed to risks from inadequate diversification;
- c) the liquidity of the Fund's investments, having regard to its expected cash flow requirements;
- d) the ability of the Fund to discharge its existing and prospective liabilities;

In addition, if there are any reserves for the Fund—to formulate, review regularly and give effect to a strategy for their prudential management, consistent with the fund's investment strategy and its capacity to discharge its liabilities (whether actual or contingent) as and when they fall due.

3.2. Investment Strategy – Asset Allocation

The Trustee is to ensure the Fund's portfolio has the right mix of assets to suit all Members' circumstances and where separate investment strategies are applied to a specific Member or a superannuation interest of the Member then the Trustee, on the advice of the Member should determine appropriate investment aims and attitude to risk.

3.3. The Issue of Risk

As a key part of the process of constructing an investment strategy, the Trustee is required by law to consider the risk in making, holding and disposing of any Fund investments. All investments entail different levels and types of risk. If need be the Trustee may engage the services of an Investment or Portfolio specialist to assess and minimise the Fund's investment strategy risk. Then the Trustee and the investment specialist can work together to decide an asset allocation that offers the Fund or specific Member, where a separate investment strategy is used, the best chance of achieving the Fund or Members investment objective within the requisite level of risk tolerance.

3.4. Borrowing to Invest into Fund Assets

The Trustee may elect to acquire investments such as property or shares using a limited recourse borrowing arrangement or self funding instalment warrants. The Trustee is aware that should they elect to using a limited recourse borrowing arrangements or self funding instalment warrants that they understand and accept the risks involved in borrowing such as return risk, impact of changes in personal circumstances, loss of assets and regulatory risk.

As the Trustee has decided to borrow with borrowings relevant to the specific borrowing assets of 0% which the Trustee has considered to be within its range of capabilities to service with cash flow coming from income of the assets and also proposed contributions by the Fund members. Insurances have also been considered in the event that any employment or potential contributions are foregone in times of serious incapacity. The Trustee intends to pay down its borrowings as quickly as possible.

3.5. Diversification to Mitigate Risk

The investment strategy laws require the Trustee of the Fund to consider the use of diversification to reduce or mitigate risk in relation to holding specific asset classes and any underlying investments corresponding to that asset class.

Diversification is best seen by the spread of a Fund's portfolio across a broad mix of assets. At the other end where a Fund applies an asset allocation to 90%-100% property with 0%-10% cash and this is exemplified by a single property, there is inherent risks if the property drops in value, cannot be tenanted, is impacted by a natural or man made disaster or more importantly if one member dies, gets divorced or is retired and needs a lump sum. A fire sale of the property to meet the Trustee's cash flow needs to satisfy a Members request can result in significant losses to current Members of the Fund.

Importantly the Trustee understands that investment markets move in different cycles, reflecting the underlying strength of the economy, industry trends and investor

sentiment. Individual assets also move differently according to external factors. Diversifying its assets can help smooth out market ups and downs.

3.6. Cash Requirements

The Trustee has assessed and monitored its cash flow requirements through its investments and has cash at hand to meet any liabilities including on-going such as accounting and audit liabilities.

The Trustee of the Fund is liable for the payment of pensions as requested by pension members of the Fund as noted in this investment strategy. The investments held by the Trustee for the pension members have been specifically acquired and maintained to meet the cash needs of the Trustee of the Fund in terms of pension members.

3.7. Balancing Risk vs Returns

The Trustee is aware that the concept of risk/return suggests that low levels of investment risk will result in potentially lower returns, while high levels of risk will generate potentially higher returns. Of course, there are no guarantees. While increased risk offers the possibility of higher returns, it also can lead to bigger losses.

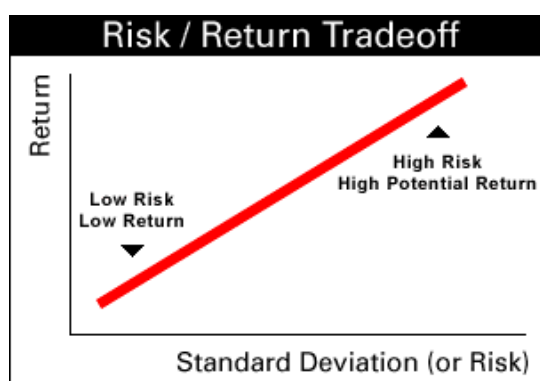


IMAGE: The risk/return trade-off principle

3.8. The Major Asset Classes for SMSF Investment and Asset Allocation for the Fund

ASSET CLASS	KEY CHARACTERISTICS	TRUSTEE TIME FRAME	BENCHMARK ALLOCATION
Cash			
Domestic Cash	Invested via bank accounts, bank bills and other similar securities. Provides income via interest. May be suitable for short-term needs.	Short-term (up to three years).	0 - 30%
International Cash	Invested via international bank accounts, term deposits, bank bills and other similar securities. International cash	Short-term (up to three years).	0%

	investments May have currency risk exposure if not hedged. Provides income via interest. May be suitable for short-term needs.		
Fixed Interest			
Domestic Fixed Interest	Can provide a steady and reliable income stream with potential for capital growth and usually offers a higher interest rate, or yield, than cash. Includes Australian government bonds, Australian company bonds plus Australian special infrastructure bonds.	Short, medium or long-term.	0 - 10%
International Fixed Interest	Can provide a steady and reliable income stream with potential for capital growth and usually offers a higher interest rate, or yield, than cash. Includes International government bonds, International company bonds plus International special infrastructure bonds. May have currency risk exposure if not hedged.	Short, medium or long-term.	0%
Equities			
Domestic Equities	Potential for capital growth, and may offer income through the payment of dividends with imputation credits. The Trustee may choose to invest in Australian companies either directly or using managed funds or listed companies.	Medium-to-long-term (five years plus).	0 - 30%
International Equities	Potential for capital growth, and may offer income through the payment of dividends with foreign tax credits. The Trustee may choose to invest in International companies either directly or using managed funds or listed companies. May have currency risk exposure if not hedged.	Medium-to-long-term (five years plus).	0 - 10%
Property			

Domestic Property	Provides the benefits of diversification through access to Australian properties in retail, office, industrial, tourism and infrastructure sectors. You can invest in Australian property directly or via managed funds or syndicates.	Medium-to-long term (five years plus).	0 - 60%
International Property	Provides the benefits of diversification through access to International properties in retail, office, industrial, tourism and infrastructure sectors. You can invest in International property directly or via managed funds or syndicates. May have currency risk exposure if not hedged.	Medium-to-long term (five years plus).	0%
Alternative			
Alternative	An investment in an asset that does not fall within the traditional asset classes noted above. They include hedge funds, private equity, art and antiques, futures, derivatives, commodities, credit, equity crowdfunding, etc.	Short, medium or long-term.	0%
Borrowing			
Borrowing	The Trustee may elect to acquire investments such as property or shares using a limited recourse borrowing arrangement or self funding instalment warrants.	Short, medium or long-term.	0%
Listed Unit Trusts	Diversification into property and international exposure.	10 years	0 - 2%
Unlisted Companies	Diversification into rural products and property.	15 - 20 years	0 - 12%

3.9. Fund Investment Strategy and Insurances

The Fund has considered the requirements of its members in terms of insurances and has noted that adequate life and potentially TPD insurances have been put in place for the following members of the Fund:

1. Brian Roughley on pension

3.10. Investment Strategy Review and Monitoring

The Trustees will monitor and review the fund's investment activities on a regular basis and to communicate with the members should they feel that any change in strategy is necessary in order to achieve the fund's objective.

THIS IS THE END OF THE FUNDS INVESTMENT STRATEGY