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# Investment Strategy of the Biddle Superannuation Fund

Date: 30<sup>th</sup> June 2021

## Dictionary

For the purposes of this Investment Strategy these words mean:

**"Relevant Requirements"** the SIS Legislation and other legislation as applicable from time to time

**"SIS Legislation"** includes:

- (a) the *Tax Laws Amendment (Simplified Superannuation) Act 2007*
- (b) the *Superannuation Industry (Supervision) Act 1993 ("SIS Act")*
- (c) the *Superannuation (Financial Assistance Funding) Levy Act 1993*
- (d) the *Superannuation (Resolution of Complaints) Act 1993*
- (e) the *Superannuation (Rolled-Over Benefits) Levy Act 1993*
- (f) the *Superannuation Industry (Supervision) Consequential Amendments Act 1993*
- (g) the *Superannuation Supervisory Levy Amendment Act 1993*
- (h) the *Occupational Superannuation Standards Amendment Act 1993*
- (i) and any regulations ("**SIS Regulations**") made under the above Acts
- (j) and all other requirements whether legislative or administrative including:
  - A. any administrative guidelines issued by the Responsible Authority; or
  - B. statements by government advising changes and any proposed changes to the SIS Legislation,

## Objective

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

The Fund:

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

The fund complies with the current laws and regulations and the rules in the trust deed. It has the following investment objectives:

### Review of insurance cover

The fund members do not need an insurance cover as they have enough cover outside of super and would not want to erode the contribution caps to fund insurance premiums.

### Risk and Rate of Return of the Biddle Superannuation Fund

It is recognised that timing (when you get into the investment) and time in the investment (how long you are in the investment) affects returns. Different investments have different returns and volatility.

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

Security of capital has to be tempered with the need to achieve the desired rate of return. Therefore, assets that show volatility may be of benefit to the fund.

The Trustee is ever vigilant to balance these two objectives: protecting the capital and growing the value of the fund by obtaining an acceptable rate of return.

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## **Reserving accounts**

Prudential management requires that a strategy be put in place so that the trustee(s) have the ability to pay its liabilities and obligations, whether contingent or actual, as and when they fall due. They can be paid to either members or for paying the expenses of the fund.

From time to time the Trustee is at liberty to put in place reserve accounts, in accordance with the deed for any classes including these categories:

1. Investment (It can also hold undistributed investment income and income above the fund's required return.)
2. Contributions (Such as an unallocated contribution made by an employer on behalf of a group of employees.)
3. Miscellaneous (These include pre 12 May 2004 forgone and forfeited benefits, plus expenses and other legal provisions.)

The Trustee is also at liberty to create a separate and additional investment strategy for reserving for each type of fund reserve.

These can be for any lawful purpose including, smoothing returns, advisory fees, accounting fees, taxes, surcharge liabilities, life and disabled insurance premiums, death and disability payments and any purposes set out in Australian Tax Offices' Superannuation Contributions Ruling 1999/1.

The Trustee is at liberty under section 55(6) *Superannuation Industry (Supervision) Act 1993* to defend against any loss or damage suffered by a member because the reserves were managed in accordance with section 52(g) (2) *Superannuation Industry (Supervision) Act 1993*.

## **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. An investment can be for capital growth only, income only or a combination

## **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 gives thought to the level of benefit required to be paid to the member. However, while no terminations or benefits are expected to be paid out in the short to medium term the Trustee is at liberty to examine investments that are medium term. However, when the member is in pension phase the time horizon may be far shorter.

## **Investments, Methods and Structures**

The Trustees may invest all or part of the money and other assets of the Fund in any manner in which they could if they were personally entitled as beneficial owners of those assets, under any circumstances and any terms, and in or through any business structure or any arrangement (including companies, joint ventures, partnerships and trusts - including unit, hybrid, family, discretionary) including:

1. in Insurance and any other type of insurance including Trauma
2. in Trustee Investments
3. in the purchase, improvement or mortgage of real property
4. on deposit with any bank or building society (and the power to open and close such accounts) or any other company partnership or person with or without security
5. in shares, stocks, options, debentures, bonds, unsecured notes or other securities

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6. in units or sub-units of any unit trust including units in a pooled superannuation trust
  7. in common funds, artworks, motor vehicles (including trucks) and live stock
  8. in bills of exchange or other negotiable instruments
  9. in options, hedging contracts, futures contracts, instalment warrants, derivatives, Contracts for Difference (CFD's), similar securities to the above and other financial instruments
  10. investing in any asset using the instalment warrant
  11. borrowing money under any circumstances, for any reason, including instalment warrant styled structures such as provided for under section 67(4A) SIS Act ("**Borrowed Moneys**") and applying the Borrowed Moneys for any purpose including the purchasing of any asset, under any circumstances (including through a trust, bare trust, warrant, instalment warrant or beneficially). Where the purchase has been made otherwise than beneficially, then the power to acquire the legal ownership of such asset (or replacement asset) at any time and the right to provide any lender with a loan on any conditions including a limited recourse loan (including a loan limited to rights relating to the original asset or the replacement asset)
  12. in other investments, which the Trustee considers on a case-by-case basis, such as investments in agribusiness
    - (a) The Trustees may dispose of, vary, transpose, replace or encumber investments or mix investments with investments of other people or trustees as if they were personally entitled to them as beneficial owners
    - (b) The Trustees invest in a manner which is consistent with the Relevant Requirements
    - (c) The Trustees may borrow money in a manner consistent with the Relevant Requirements
    - (d) The Trustees may only lend money to Members if it is consistent with the Relevant Requirements

### **Borrowing**

To seek higher returns, the Trustee may borrow money under any circumstances, for any reason, including instalment warrant styled structures such as provided for under section 67(4A) SIS Act ("**Borrowed Moneys**") and applying the Borrowed Moneys for any purpose including the purchasing of any asset, under any circumstances (including through a trust, bare trust, warrant, instalment warrant or beneficially). Where the purchase has been made otherwise than beneficially, then the power to acquire the legal ownership of such asset (or replacement asset) at any time and the right to provide any lender with a loan on any conditions including a limited recourse loan (including a loan limited to rights relating to the original asset or the replacement asset).

### **Diversity of the Member's Fund**

Holding a number of investments is the essence of diversity. This may have the effect of reducing volatility. However, diversification is only one factor to be considered in this strategy.

The Trustee may, in writing, change the spread of investments (even on a daily basis). However, the fund's current investment spread is:

Asset Allocation (%) of the Superannuation Fund	Range (%) e.g. 0 – 100%
Cash	25.01%
Australian Fixed Interest	0.00%
International Fixed Interest	0.00%
Australian Equities (Current Benchmark: S&P ASX 200)	73.27%
International Equities (Current Benchmark: MSCI World Ex \$A)	0.00%
Diversified Property (other than residential)	0.00%
Residential, commercial or retail property (direct, listed or unlisted)	0.00%
Hedge funds	0.00%
Antiques, collectables and art works	0.00%
Loans, loan facilities and securities	0.00%
Other investments (considered on a case by case basis) such as agribusiness	0.00%
Others: Plant & Equipment	1.72%

Where no range has been inserted above then the Trustee considers that no specific percentage range for each of the asset classes should be adopted but that each asset class should be considered on its own investment merits having regard to an appropriate degree of diversification.

#### **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.

#### **Investments of Biddle Superannuation Fund**

##### **Cash**

Money can be held in kind, in banks, building societies, lending institutions and cash management accounts.

##### **Australian Shares**

After research and due diligence, these include listed and unlisted securities including shares, warrants, derivatives, Contracts for Difference (CFD's), derivatives securities and managed funds.

##### **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.

##### **International Shares**

After research and due diligence, these include investments directly or indirectly in listed and unlisted shares from around the world including listed and unlisted securities including shares, warrants, derivatives, Contracts for Difference (CFD's), derivatives securities and managed funds.

##### **Property**

After research and due diligence, this includes both direct and indirect investments in listed and unlisted property trusts and property securities funds.

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**Review**

The Trustees may review this strategy as required, but it will be reviewed at least annually.

Signed by the Trustee(s) Ms Kerry Lynn Biddle *KLBiddle* .....