

**PART A**

**Electronic lodgment declaration (Form P, T, F, SMSF or EX)**

This declaration is to be completed where the tax return is to be lodged via an approved ATO electronic channel. It is the responsibility of the taxpayer to retain this declaration for a period of five years after the declaration is made, penalties may apply for failure to do so.

Tax File Number  Year of return

Name of Partnership, Trust, Fund or Entity

Total Income/Loss	Total Deductions	Taxable Income/Loss
<input type="text" value="29819"/>	<input type="text" value="28978"/>	<input type="text" value="841"/>

**Privacy**  
The ATO is authorised by the Taxation Administration Act 1953 to request the provision of tax file numbers (TFNs). The ATO will use the TFNs to identify each partner or beneficiary or entity in our records. It is not an offence not to provide the TFNs. However, you cannot lodge your tax return electronically if you do not quote your TFN.

Taxation law authorises the ATO to collect information and disclose it to other government agencies, including personal information about the person authorised to sign the declaration. For information about privacy go to [ato.gov.au/privacy](http://ato.gov.au/privacy)

**The Australian Business Register**  
The Commissioner of Taxation, as Registrar of the Australian Business Register, may use the ABN and business details which you provide on this tax return to maintain the integrity of the register.

Please refer to the privacy statement on the Australian Business Register (ABR) website ([www.abr.gov.au](http://www.abr.gov.au)) for further information - it outlines our commitment to safeguarding your details.

**Electronic funds transfer - direct debit**  
Where you have requested an EFT direct debit some of your details will be provided to your financial institution and the Tax Office's sponsor bank to facilitate the payment of your taxation liability from your nominated account.

I authorise my tax agent to electronically transmit this tax return via an approved ATO electronic channel.

**Important:** Before making this declaration please check to ensure that all income has been disclosed and the tax return is true and correct in every detail. If you are in doubt about any aspect of the tax return, place all the facts before the Tax Office. The tax law provides heavy penalties for false or misleading statements on tax returns.

**Declaration:** I declare that:  
\* all the information I have provided to my registered tax agent for the preparation of this tax return, including any applicable schedules is true and correct, and  
\* I authorise the agent to give this document to the Commissioner of Taxation.

Signature of Partner, Trustee or Director   Date

**PART B**

**ELECTRONIC FUNDS TRANSFER CONSENT**

This declaration is to be completed when an electronic funds transfer (EFT) of a refund is requested and the tax return is being lodged through an approved ATO electronic channel.

This declaration must be signed by the partner, trustee, director or public officer prior to the EFT details being transmitted to the Tax Office. If you elect for an EFT, all details below must be completed.

**Important:** Care should be taken when completing EFT details as the payment of any refund will be made to the account specified.

Account name:

I authorise the refund to be deposited directly to the specified account

Signature   Date

**PART D**

**Tax agent's certificate (shared facilities only)**

I, Coull & Prior Taxation Consultants declare that:

- \* I have prepared this tax return in accordance with the information supplied by the partner, trustee, director or public officer
- \* I have received a declaration made by the entity that the information provided to me for the preparation of this tax return is true and correct, and
- \* I am authorised by the partner, trustee, director or public officer to lodge this tax return, including any applicable schedules.

Agent's Signature	<input type="text"/>	Date	<input type="text"/>
Agent's phone	<input type="text" value="08 84474433"/>	Client's reference	<input type="text" value="CALUSF"/>
Agent's Contact Name	<input type="text" value="David Vannetiello"/>		
Agent's reference number	<input type="text" value="24707728"/>		

## 2019 Client substantiation declaration

I confirm that Coull & Prior Taxation Consultants have advised me that I must demonstrate that I have incurred an expense for income producing purposes. In addition, Coull & Prior Taxation Consultants have advised me of the stringent SUBSTANTIATION legislation I must satisfy in relation to work, car and business travel expenses.

In addition, Coull & Prior Taxation Consultants have informed me that I must obtain original receipts and keep them for a minimum of five years from the date my return is lodged. The receipts must contain the following details:

- name of supplier;
- date and amount of expense; and
- nature of goods and services (noting the specific type of items purchased or expenditure incurred which I am able to personally record up to the date of lodgment of my return where not adequately noted by the supplier).

### Penalties to apply with incorrect returns

Coull & Prior Taxation Consultants have also advised me that additional tax, penalties, interest and possible prosecution action may be taken against me by the ATO if I provide details which lead to an incorrect tax return being lodged.

In addition, Coull & Prior Taxation Consultants have informed me that an important feature of the new tax agent services regime which commenced on 1 March 2010 is the provision of a "safe harbour" protection from penalties in certain circumstances for taxpayers who engage registered tax agents.

Coull & Prior Taxation Consultants have also advised me that in order to obtain the benefits of "safe harbour" protection, I must provide them with "all relevant taxation information" to enable accurate statements to be provided to the Australian Taxation Office.

### Income from sources in and out of Australia for the year of income

Coull & Prior Taxation Consultants have advised me that as an Australian resident I must declare income from all sources, in **and out** of Australia, including net capital gains received, for the year of income in my tax return.

### Apportionment

Where items are used for both business and private purposes, e.g., car, mobile telephone, home telephone, computer etc, I have records to verify my business usage claim. In addition, my employer will verify that it was necessary to incur such expenditure in earning my assessable income. Further, I have instructed Coull & Prior Taxation Consultants to prepare the return based on me being able to produce these records, if required.

### Audit matters

I further confirm that:

- I am aware of the procedures to follow if a document is lost or destroyed;
- I may be required to verify any income or expense item noted in my return in the event of an ATO audit;
- I understand the Substantiation schedules I completed for all work, car and travel expense claims under self-assessment; and
- I understand that, for the purposes of obtaining "safe harbour" protection, it remains my responsibility to properly record matters relating to my tax affairs and to bring all of the relevant facts to attention in order to show reasonable care; and
- I have read and understood the return prepared for me.
- I authorise Coull & Prior to provide contact information to the ATO in relation to Income Tax, GST and other liabilities

### Secure Client Portal Authority

#### I confirm that:

I give authority for documents, including correspondence from the Australian Taxation Office, to be made available to me via the Secure Client Portal

I acknowledge and give permission for any shared email users to have access to any documents made available to me via the Secure Client Portal

I acknowledge that it is my responsibility to notify Coull & Prior Taxation Consultants of a change of email address

### Payments

I acknowledge that payment of account is due and payable within 14 days of the invoice date. I understand if payment is not received within the said 14-day period I may be charged a late fee of \$15 per month. In the event where overdue invoices are referred to a collection agency and/or legal firm I understand I will be liable for all costs which would be incurred until the debt is settled in full.

#### I declare that:

- I have disclosed, and Coull & Prior Taxation Consultants have returned, all of the income including net capital gains which I have earned/received, for the 2019 income year.
- All income declared, claims for deductions and tax offsets/rebates included in my return are based on my specific instructions and advice that I satisfy the relevant taxation requirements.
- I have all receipts or documentation necessary to substantiate the above claims and I will make them available if required by the Tax Office; and
- Coull & Prior Taxation Consultants have clarified what written evidence (including car/travel records) will be required during an audit and penalties, (including prosecution) that may be applied if incorrect claims are identified in an audit situation.

Tax File Number 941,836,745

Signature of Taxpayer **X**  Dated 12/05/2020

**Carruthers Luvera Family Super Fund**  
**Carruthers Luvera Family Super Pty Ltd ACN: 160983479**  
**Trustees Declaration**

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The directors of the trustee company have determined that the Fund is not a reporting entity and that these special purpose financial statements should be prepared in accordance with the accounting policies described in Note 1 to the financial statements.

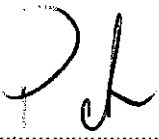
The directors of the trustee company declare that:

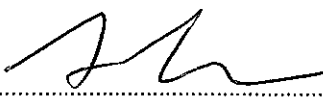
- (i) the financial statements and notes to the financial statements for the year ended 30 June 2019 present fairly, in all material respects, the financial position of the Superannuation Fund at 30 June 2019 and the results of its operations for the year ended on that date in accordance with the accounting policies described in Note 1 to the financial statements;
- (ii) the financial statements and notes to the financial statements have been prepared in accordance with the requirements of the trust deed; and
- (iii) the operation of the superannuation fund has been carried out in accordance with its trust deed and in compliance with the requirements of the Superannuation Industry (Supervision) Act 1993 and associated Regulations during the year ended 30 June 2019.

Specifically, the directors of the trustee company declare that:

- in accordance with s120 of the Superannuation Industry (Supervision) Act 1993, no individual trustee has been or is a disqualified person;
- the Fund has satisfactory title to all assets, all assets are unencumbered and free from charge as prescribed by s50 of the Superannuation Industry (Supervision) Act 1993 and reg13.14 of the Superannuation Industry (Supervision) Act 1994; and
- to the knowledge of the directors of the trustee company, there have been no events or transactions subsequent to the balance date which could have a material impact on the Fund. Where such events have occurred, the effect of such events has been accounted and noted in the Fund's financial statements.

Signed in accordance with a resolution of the directors of the trustee company by:

x   
.....  
Peta Carruthers  
Carruthers Luvera Family Super Pty Ltd  
Director

x   
.....  
Frank Luvera  
Carruthers Luvera Family Super Pty Ltd  
Director

Dated this 29-5 day of 2020

# Memorandum of Resolutions of the Director(s) of

Carruthers Luvera Family Super Pty Ltd ACN: 160983479

ATF Carruthers Luvera Family Super Fund

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**FINANCIAL STATEMENTS OF SUPERANNUATION FUND:**

It was resolved that the financial statements would be prepared as special purpose financial statements as, in the opinion of the trustee(s), the Superannuation Fund is a non-reporting entity and therefore is not required to comply with all Australian Accounting Standards.

It was further resolved that the financial statements and notes to the financial statements of the Superannuation Fund in respect of the year ended 30 June 2019 thereon be adopted.

**TRUSTEE'S DECLARATION:**

It was resolved that the trustee's declaration of the Superannuation Fund be signed.

**ANNUAL RETURN:**

Being satisfied that the Fund had complied with the requirements of the Superannuation Industry (Supervision) Act 1993 (SISA) and Regulations during the year ended 30 June 2019, it was resolved that the annual return be approved, signed and lodged with the Australian Taxation Office.

**TRUST DEED:**

It was resolved that the advice received from the Fund's legal adviser confirming that the fund's trust deed is consistent with all relevant superannuation and trust law.

**INVESTMENT STRATEGY:**

The allocation of the Fund's assets and the Fund's investment performance over the financial year were reviewed and found to be within the acceptable ranges outlined in the investment strategy. After considering the risk, rate of return, diversification and liquidity of the investments and the ability of the Fund to discharge its existing liabilities, it was resolved that the investment strategy continues to reflect the purposes and circumstances of the Fund and its members. Accordingly, no changes in the investment strategy were required.

**INSURANCE COVER:**

The trustee(s) reviewed the current life and total and permanent disability insurance coverage on offer to the members and resolved that the current insurance arrangements were appropriate for the Fund.

**ALLOCATION OF INCOME:**

It was resolved that the income of the Fund would be allocated to the members based on their average daily balance (an alternative allocation basis may be percentage of opening balance).

**INVESTMENT ACQUISITIONS:**

It was resolved to ratify the investment acquisitions throughout the financial year ended 30 June 2019.

**INVESTMENT DISPOSALS:**

It was resolved to ratify the investment disposals throughout the financial year ended 30 June 2019.

**AUDITORS:**

It was resolved that

Anthony William Boys

of

PO Box 3376, Rundle Mall, South Australia 5000

act as auditors of the Fund for the next financial year.

**TAX AGENTS:**

It was resolved that

Coull & Prior Taxation Consultants

act as tax agents of the Fund for the next financial year.

**Memorandum of Resolutions of the Director(s) of  
Carruthers Luvera Family Super Pty Ltd ACN: 160983479  
ATF Carruthers Luvera Family Super Fund**

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**TRUSTEE STATUS:**

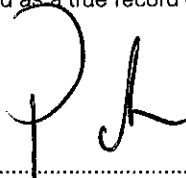
Each of the trustee(s) confirmed that they are qualified to act as trustee(s) of the Fund and that they are not disqualified persons as defined by s 120 of the SISA.

**CONTRIBUTIONS RECEIVED:**


It was resolved that the contributions during the year be allocated to members on the basis of the schedule provided by the principal Fund employer.

**CLOSURE:**

Signed as a true record –

x  29/5/20

Peta Carruthers

x 

Frank Luvera

12/10/2020

- borrowing money (or maintaining an existing borrowing) on behalf of the fund except in certain limited circumstances (while limited recourse borrowing arrangements are permitted, they can be complex and particular conditions must be met to ensure that legal requirements are not breached)
- acquiring an in-house asset if the fund's in-house assets exceed 5% of the market value of the fund's total assets, or the in-house assets will exceed 5% of the market value of the fund's total assets by acquiring the asset (in-house assets are loans to, or investments in, related parties of the fund – including trusts – or assets subject to a lease or lease arrangement between the trustee and a member, relative or other related party)
- entering into investments that are not made or maintained on an arm's length (commercial) basis (this ensures the purchase or sale price of the fund's assets and any earnings from those assets reflects their market value).

**Administration**

I understand that the trustees of the fund must:

- keep and retain for at least 10 years
  - minutes of all trustee meetings at which matters affecting the fund were considered (this includes investment decisions and decisions to appoint members and trustees, the retirement of members and payment of benefits)
  - records of all changes of trustees, including directors of the corporate trustee
  - each trustee's consent to be appointed as a trustee of the fund or a director of the corporate trustee
  - all trustee declarations
  - copies of all reports given to members
  - documented decisions about storage of collectables and personal use assets
- ensure that the following are prepared and retained for at least five years
  - an annual statement of the financial position of the fund
  - an annual operating statement
  - copies of all annual returns lodged
  - accounts and statements that accurately record and explain the transactions and financial position of the fund including asset market valuation
  - copies of Transfer balance account reports lodged
  - copies of any other statements you are required to lodge with us or provide to other super funds
- appoint an approved SMSF auditor each year, no later than 45 days before the due date for lodgment of the fund's annual return and provide documents to the auditor as requested
- lodge the fund's annual return, completed in its entirety, by the due date
- review the independent audit report received from the approved SMSF auditor and take action as required
- notify the ATO within 28 days of any changes to the
  - membership of the fund, or trustees or directors of the corporate trustee
  - name of the fund
  - contact person and their contact details
  - postal address, registered address or address for service of notices for the fund
- notify the ATO in writing within 21 days if the fund becomes an Australian Prudential Regulation Authority (APRA) regulated fund.

**DECLARATION**

By signing this declaration I acknowledge that I understand my duties and responsibilities as a trustee or director of the corporate trustee of the self-managed superannuation fund named on this declaration (or if the fund's name changes, that name). I understand that:

- I must ensure this document is retained for at least 10 years or while I remain a trustee or director of the corporate trustee (whichever is longer) and, if I fail to do this, penalties may apply.
- Administrative penalties can be imposed on me for not complying with the legislation
- I may have to make this document available for inspection by a member of staff of the ATO and, if I fail to do this, penalties may apply.
- I do not have access to the government's financial assistance program that is available to trustees of APRA regulated funds in the case of financial loss due to fraudulent conduct or theft.

Trustee's or director's name

Peta Carruthers

Trustee's or director's signature

X 

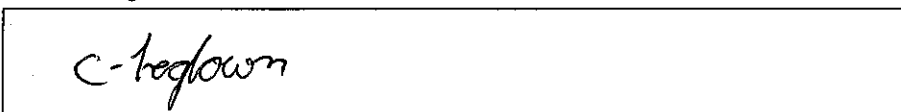
Date

Day Month Year  
29 / 05 / 2020

Witness' name (witness must be 18 years old or over)

Catherine Trglown

Witness' signature

X 

Date

Day Month Year  
29 / 05 / 2020



# Self-managed super fund trustee declaration

**I understand that as an individual trustee or director of the corporate trustee of**

Fund name

Carruthers Lovera Family Super Fund
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I am responsible for ensuring that the fund is operated in accordance with the *Superannuation Industry (Supervision) Act 1993* (SISA) and other relevant legislation. The Commissioner of Taxation (the Commissioner) has the authority and responsibility for administering the legislation and enforcing trustees' compliance with the law.

I must keep myself informed of changes to the legislation relevant to the operation of my fund and ensure the trust deed is kept up to date in accordance with the law and the needs of the members.

If I do not comply with the legislation, the Commissioner may take the following actions:

- impose administrative penalties on me
- give me a written direction to rectify any contraventions or undertake a course of education
- enter into agreements with me to rectify any contraventions of the legislation
- disqualify me from being a trustee or director of a corporate trustee of any superannuation fund in the future
- remove the fund's complying status, which may result in significant adverse tax consequences for the fund
- prosecute me under the law, which may result in fines or imprisonment.

**Sole purpose**

I understand it is my responsibility to ensure the fund is maintained for the purpose of providing benefits to the members upon their retirement (or attainment of a certain age) or their beneficiaries if a member dies. I understand that I should regularly evaluate whether the fund continues to be the appropriate vehicle to meet this purpose.

**Trustee duties**

I understand that by law I must at all times:

- act honestly in all matters concerning the fund
- exercise skill, care and diligence in managing the fund
- act in the best interests of all the members of the fund
- keep records of decisions made about the running of the fund, including the appointment of professional advisers and the retirement of members and payment of benefits
- ensure that my money and other assets are kept separate from the money and other assets of the fund
- take appropriate action to protect the fund's assets (for example, have sufficient evidence of the ownership of fund assets)
- refrain from entering into any contract or do anything that would prevent me from, or hinder me in, properly performing or exercising my functions or powers as a trustee or director of the corporate trustee of the fund
- allow all members of the fund to have access to information and documents as required, including details about
  - the financial situation of the fund
  - the investments of the fund
  - the members' benefit entitlements.

I also understand that by law I must prepare, implement and regularly review an investment strategy having regard to all the circumstances of the fund, which include, but are not limited to:

- the risks associated with the fund's investments
- the likely return from investments, taking into account the fund's objectives and expected cash flow requirements
- investment diversity and the fund's exposure to risk due to inadequate diversification
- the liquidity of the fund's investments having regard to the fund's expected cash flow requirements in discharging its existing and prospective liabilities (including benefit payments)
- whether the trustees of the fund should hold insurance cover for one or more members of the fund.

**Accepting contributions and paying benefits**

I understand that I can only accept contributions and pay benefits (income streams or lump sums) to members or their beneficiaries when the conditions specified in the law and the fund trust deed have been met.

**Investment restrictions**

I understand that, as a trustee or director of the corporate trustee of the fund, subject to certain limited exceptions specified in the law, I am prohibited from:

- giving financial assistance using the resources of the fund to a member of the fund or a member's relative (financial assistance means any assistance that improves the financial position of a person directly or indirectly, including the provision of credit)
- acquiring assets (other than business real property, listed securities, certain in-house assets and acquisitions made under mergers, allowed by special determinations or acquisitions from the trustee or investment manager of another regulated super fund as a result of a breakdown of a relationship) for the fund from members or other related parties of the fund



- selecting and applying appropriate accounting policies; and
  - making accounting estimates that are reasonable in the circumstances.
- As part of our audit process, we will request from the trustees written confirmation concerning representations made to us in connection with the audit.

**Other Matters under the *Corporations Act 2001***

*Independence*

We confirm that, to the best of our knowledge and belief, we currently meet the independence requirements of the *Corporations Act 2001* in relation to the audit of the financial report. In conducting our audit of the financial report, should we become aware that we have contravened the independence requirements of the *Corporations Act 2001*, we shall notify you on a timely basis.


We look forward to your full cooperation and make available to us whatever records, documentation and other information we request in connection with our audit.

Please sign and return the attached copy of this letter to indicate that it is in accordance with your understanding of the arrangements for our audit of the financial report.

Yours faithfully,

.....  
A.W. Boys  
SAN: 100014140  
Registered Company Auditor 67793  
Dated

Acknowledged on behalf of, Carruthers Luvera Super Fund by

x   
.....  
Frank Martin Luvera

12 / 05 / 2020  
.....  
Date

## ENGAGEMENT LETTER

To: The Trustees,  
Carruthers Luvera Super Fund  
7 Gulf Court  
SEMAPHORE PARK SA 5019

### Scope

You have requested that we audit the financial report of Carruthers Luvera Super Fund, which comprises the balance sheet as at 30 June 2019, and the income statement for the year then ended a summary of significant accounting policies, other explanatory notes and the trustees' declaration. We are pleased to confirm our acceptance and our understanding of this engagement by means of this letter. Our audit will be conducted with the objective of expressing an opinion on the financial report and compliance with the *Superannuation Industry Supervisory Act 1993*.

We will conduct our audit in accordance with Australian Auditing Standards. Those Auditing Standards require that we comply with relevant ethical requirements relating to audit engagements and plan and perform the audit to obtain reasonable assurance whether the financial report is free from material misstatement. An audit involves performing audit procedures to obtain audit evidence about the amounts and disclosures in the financial report. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial report, whether due to fraud or error. An audit also includes evaluating the appropriateness of the financial reporting framework, accounting policies used and the reasonableness of accounting estimates made by the Trustees, as well as evaluating the overall presentation of the financial report.

Because of the test nature and other inherent limitations of an audit, together with the inherent limitations of any accounting and internal control system, there is an unavoidable risk that even some material misstatements may remain undiscovered. In making our risk assessments, we consider internal control relevant to the entity's preparation of the financial report in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control.

We take this opportunity to remind you that the responsibility for the preparation and fair presentation of the financial report in accordance with Australian Accounting Standards (including the Australian Accounting Interpretations) and the *Superannuation Industry Supervisory Act 1993* is that of the trustees. Our auditor's report will explain that the trustees are responsible for the preparation and the fair presentation of the financial report in accordance with the applicable financial reporting framework and this responsibility includes:

- designing, implementing and maintaining internal control relevant to the preparation of a financial report that is free from misstatement, whether due to fraud or error;

# **CARRUTHERS LUVERA FAMILY SUPER FUND**

Investment Strategy  
1 July 2019

## **FUND PROFILE**

### **Purpose of Establishment**

The Fund was established to provide lump sum and/or pension benefits for members on or after retirement, or at reaching their preservation age (as defined under the Superannuation Industry (Supervision) Act 1993 (SIS)) as well as the provision of benefits in the event of the death and/or disablement of members and their dependants.

### **Fund Demographics**

Members can vary in age, the youngest member to be accepted should not be less than that provided in the Deed and there is no upper age limit. The Trustee(s) shall consider the age of the Fund members and their likely retirement ages when making its investment decisions.

### **Type of Fund**

The Fund has been established as an accumulation fund. As such benefits are calculated based on the amount contributed to the Fund, earnings of the Fund and amounts attributed to the member.

The Fund will accept all types of contributions allowable under the governing legislation.

### **Fund Benefits**

The Fund is anticipated to be in the accumulation phase until one of its members reaches their preservation age. From this time the Fund may be partially in an accumulation phase and partially in a pension phase, until the last member reaches their pension phase.

The current intention is to pay the member's benefits upon retirement in either a lump sum and/or pension. The Trustee(s) shall make investment decisions of the Fund having regard to the time horizon to the retirement of members and the future cashflow requirements of the Fund.

### **Insurance Cover**

The Fund will allow each member to insure their life. The Trustee(s) of the Fund will take out the cover requested by a member given the cover meets one of the arms of the Purpose of Establishment of the Fund.

The Trustee(s) will not determine the level of cover required. This will remain the responsibility of the member. The Trustee(s) will endeavour to take all reasonable steps to ensure the requested insurance cover is effected within a period of 30 days. This period of time is however contingent on the insurer accepting the application and the insurer's requirements of the member to demonstrate their insurability. The Trustee(s) will not be held liable for any insurance cover which is not effected or delays caused in effecting the insurance cover due to the insurer's requirements.

Any benefit that becomes payable to the Trustee(s) of the Fund by the insurance company due to the death or disablement of the member, will be determined by the Trustee(s) in accordance with the SIS regulations as to its terms of payment. At all times the payment of any insurance benefit to a member or their dependants will remain at the discretion of the Trustee(s).

## **GENERAL OBJECTIVES**

The Trustee(s) will act to ensure at all times the Fund complies with the regulations set out in SIS in accordance with the following key areas:

- borrowing restrictions (section 67 of SIS)
- lending and financial assistance prohibitions to members or their relatives (section 65 of SIS)
- acquisition of asset prohibitions from related parties of the Fund (section 66 of SIS)
- in-house asset limits (section 83 of SIS).

As such, within these objectives this document does not re-iterate the intent of the legislation.

The Trustee(s) will ensure at all times investments are authorised under the Trust Deed and are made in accordance with the Purpose of Establishment.

The Trustee(s) will ensure at all times the Fund remains a complying superannuation fund for taxation purposes.

The Trustee(s) will ensure at all times the investments undertaken are done so at arm's-length, or alternatively where the transaction is not at arm's-length the terms are not more favourable than if the transaction had been conducted at arm's-length (section 109 of SIS).

The Trustee(s) may consider and accept investment suggestions from members of the Fund, for the Fund generally or for a class of members. The Trustee(s) have ultimate discretion to consider, accept and/or implement the decisions given due consideration of the above SIS regulations and the below Investment Strategy principles.

## **INVESTMENT STRATEGY**

This investment strategy documents the intent of the Fund when purchasing, holding and selling assets. A well-diversified portfolio is the general intent designed to support the Fund's requirements in meeting the member's needs.

Over time as members move from the accumulation to pension phase the Trustee(s) may adjust the composition and actual underlying assets of the Fund.

The Trustee(s) reserve the right to develop and offer more than one investment strategy to meet the individual needs of members or classes of members of the Fund. This may require implementing different decisions with respect to the purchasing, holding and/or selling of investments in order to meet the relevant strategy.

### **Investment Objectives**

The Trustee(s) shall at all times act prudently to pursue the maximum rate of return, given the set risk parameters and in consideration of suitable levels of diversification.

## Performance Objectives

The Trustee(s) have considered the current and likely benefit payments, the time frame to retirement of the current members and determined the following performance objectives:

- to provide a return sufficient to meet the costs of administering the Fund
- to provide a return on capital (net of taxes) at a minimum of 2.0% per annum above the underlying inflation rate each year
- to have an expectation of negative returns over any ten year time frame commensurate to the risk profile adopted.

## Asset Diversification

In considering the degree of diversification appropriate to the Fund the Trustee(s) have taken into consideration the following:

- the existing assets of the Fund
- the Fund's access to expert research and investment advice
- the current and likely future membership of the Fund.

The Trustee(s) may consider and implement a single asset or single asset class strategy where it deems it appropriate given all other factors documented in this Investment Strategy.

## Risk Profile

In light of the Investment Objective of the Fund and its Performance Objectives, the Trustee(s) having considered the following areas of the Fund:

- the Purpose of Establishment
- the Fund Demographics
- the General Objectives, and
- the Investment Objectives.

In doing so the Trustee(s) have determined the benchmark asset allocation and appropriate ranges meet the commensurate levels of risk.

The Trustee(s) have determined the appropriate asset allocation as follows:

Asset classes	Minimum %	Benchmark %	Maximum %
Cash	2	5	100
Fixed Interest	0	0	0
Property	0	90	90
Shares – Australian	0	5	50
Shares - International	0	0	0

It is the Trustee's intention to adopt the benchmark asset allocation over the longer term in order to achieve the investment objectives of the Fund.

## **Asset Management**

In terms of the underlying investments within the Fund, when making an investment decision the Trustee(s) shall give consideration to the detailed principles for each asset class.

### Cash

Cash is an important component of the Fund's assets in order to be able to meet ongoing administration costs and expenses as well as having sufficient funds to meet any benefit payments due to members.

Depending upon the investment markets cash may also act as a short term strategy to hold member contributions whilst determining appropriate investment options.

It is expected that the cash balance will vary significantly throughout the course of a reporting period. Cash is the most liquid form of investment.

Prior to investing in any cash funds or realising a cash holding, the Trustee(s) shall give consideration to the current liquidity of the Fund. It shall also give consideration to the prevailing interest return and security of the investment in comparison to alternate forms of investment.

### Fixed Interest

Fixed interest investments provide more certainty in the level of income for the Fund over the term of the investment.

Fixed interest investments are an alternative form of investment to cash, with slightly less flexibility due to the investment being made for a term, or period of time. When considering such an investment due consideration must be given to the time frame of investment. Should capital be required prior to the end of the term of a fixed interest investment then a penalty fee may apply. Thus this asset class is slightly less liquid than cash.

The risk with this type of investment is movements in the prevailing interest rate. Should there be an upward move in the prevailing interest rate and the invested capital be required prior to the end of the term then a capital loss would generally occur. On the other hand should an interest rate decline occur over the term of the investment, then the Trustee(s) may consider the sale of the investment in order to realise a capital gain, in consideration of the other factors of the investment and needs of the Fund.

One final consideration is the security of the issuing company. Fixed interest investments are available across various rates of security. A fixed interest investment issued by a Government is typically more secure than an equivalent security which is issued by a publicly listed company.

### Property

Property investments can be made in two forms, direct and listed.

Property in the form of owning a direct asset is typically the least liquid form of investment. Typically, it requires a buyer at the time of offer to purchase the entire building and/or land. This can have a considerable lead time.

However property can provide a relatively secure level of income. The risk is the inability of the tenant to meet their rental obligations.

One final consideration with direct property is the capital required to purchase one asset. Typically this can be the majority of the Fund's assets.

Should the Trustee(s) consider investment in a direct property they shall obtain appropriate valuations for the purchase price and rental income to satisfy themselves that the price or units of the property reflect the true value of the investment.

Property in the form of unit trusts provides a more liquid form of investment with more diversification through exposure to various properties.

In terms of direct property ownership the Trustee(s) will comply with the prevailing legislation. In terms of unit trust property ownership the Trustee(s) have greater flexibility in their decision making.

### Shares - Australian

Share investments can be made in two forms, listed and un-listed (via unit trusts).

When considering investments in the form of direct shareholdings the Trustee(s) shall ensure the decision is based upon the anticipated longer term capital appreciation of the investment, as measured by the increase in its share price, as well as the potential dividend stream.

When investing in direct shares the Trustee(s) shall also give due consideration to the current exposure to the sectors of business the companies operate within (ie industrial, banking, retail, resources, etc), the manner in which the underlying companies act and respond in various market conditions, (ie recession, recovery, etc) and the requirement for ongoing monitoring of such investments on a regular basis.

Where the Trustee(s) are of the opinion they do not hold the requisite skill set or have the time to appropriately evaluate and monitor a portfolio of direct shareholdings, then the investments shall be made through unit trusts.

Unit trusts may also be used as an investment option in conjunction with a portfolio of direct shareholdings or in isolation.

The tax effectiveness of franking credits which are derived from holding investments where tax is paid at a rate higher than that paid within the Fund, produces an effect to reduce the tax paid by the Fund on its earnings. This tax benefit may form part of the investment decision.

### Shares - International

Historically this asset class has provided investors with the highest capital return. Past performance is no guarantee of future performance and as such this asset class must be evaluated on its merits to provide:

- income return
- capital return, in excess of the prevailing inflation rate by a minimum of 2.0% per annum
- volatility in the capital value.

Again this asset class can be accessed through both direct investment and unit trusts.



Direct investment in international shares requires more time and administration than its counterpart. As such typically the Trustee(s) shall consider investing in this asset class primarily through the use of unit trusts.

## **Risk Management**

In relation to the risks involved with investing the assets of the Fund, when making an investment decision the Trustee(s) shall give consideration to a range of possible risks.

### Mismatch Risk

The chosen investment may not be suitable for the member's needs, goals and circumstances.

### Inflation Risk

The real purchasing power of invested funds may not keep pace with inflation.

### Reinvestment Risk

If the member(s) rely on fixed rate investments, maturing funds may have to be reinvested at a lower rate of interest.

### Market Risk

Movements in the market mean the value of investments can go down as well as up – and sometimes suddenly.

### Timing Risk

Trying to time entry to and exit from markets can involve exposure to potentially greater short-term volatility.

### Risk of Not Diversifying

If all funds are invested into one market a fall in that market will adversely affect all of the capital.

### Liquidity Risk

Access to funds may not occur as quickly as required without suffering a fall in value.

### Credit Risk

The institution that funds are invested with may not be able to make the required interest payments or repay capital.

### Legislative Risk

Investment strategies or products could be affected by changes in current regulations.

### Value Risk

Too much may be paid for the investment or it is sold too cheaply.

### Manager Risk

The personnel or ownership of the fund manager may change so that the manager no longer has access to the skills or attitudes that contributed to earlier performance levels.

### Currency Risk

Investments in assets located in other countries may rise or fall in value due to the relative value of the Australian currency.

### **Monitoring the Investment Strategy**

At a minimum, the Trustee(s) of the Fund will review the performance of the underlying assets of the Fund against the investment and performance objectives and performance measurements annually.

A review of the Fund's performance and/or investment strategy may be completed at such other times as a significant event occurs which affects the Fund.

Where required the Trustee(s) following the review may make decisions to purchase new assets, hold existing assets or sell existing assets in accordance with the overall Investment Strategy of the Fund.

At each review the Trustee(s) may also consider the ongoing appropriateness of the Investment Strategy of the Fund and make decisions to amend the strategy in consideration of the Fund's Profile.

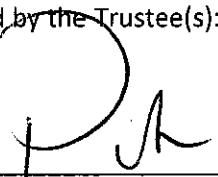
### **Reporting to Members**

Upon joining the Fund as a member, a copy of this 'Investment Strategy' will be provided to the member.

Where a material change occurs to the 'Investment Strategy' of the Fund a copy of the amended 'Investment Strategy' will be mailed to each member.

### **DECLARATION**

The documented Investment Strategy and its included principles, conditions and regulations are accepted by the Trustee(s):

 25/5/2020

Peta Carruthers  
Director – Carruthers Luvera Family Super Pty Ltd

  
Frank Luvera  
Director – Carruthers Luvera Family Super Pty Ltd

Date: 01/07/2019

- borrowing money (or maintaining an existing borrowing) on behalf of the fund except in certain limited circumstances (while limited recourse borrowing arrangements are permitted, they can be complex and particular conditions must be met to ensure that legal requirements are not breached)
- acquiring an in-house asset if the fund's in-house assets exceed 5% of the market value of the fund's total assets, or the in-house assets will exceed 5% of the market value of the fund's total assets by acquiring the asset (in-house assets are loans to, or investments in, related parties of the fund – including trusts – or assets subject to a lease or lease arrangement between the trustee and a member, relative or other related party)
- entering into investments that are not made or maintained on an arm's length (commercial) basis (this ensures the purchase or sale price of the fund's assets and any earnings from those assets reflects their market value).

**Administration**

I understand that the trustees of the fund must:

- keep and retain for at least 10 years
  - minutes of all trustee meetings at which matters affecting the fund were considered (this includes investment decisions and decisions to appoint members and trustees, the retirement of members and payment of benefits)
  - records of all changes of trustees, including directors of the corporate trustee
  - each trustee's consent to be appointed as a trustee of the fund or a director of the corporate trustee
  - all trustee declarations
  - copies of all reports given to members
  - documented decisions about storage of collectables and personal use assets
- ensure that the following are prepared and retained for at least five years
  - an annual statement of the financial position of the fund
  - an annual operating statement
  - copies of all annual returns lodged
  - accounts and statements that accurately record and explain the transactions and financial position of the fund including asset market valuation
  - copies of Transfer balance account reports lodged
  - copies of any other statements you are required to lodge with us or provide to other super funds
- appoint an approved SMSF auditor each year, no later than 45 days before the due date for lodgment of the fund's annual return and provide documents to the auditor as requested
- lodge the fund's annual return, completed in its entirety, by the due date
- review the independent audit report received from the approved SMSF auditor and take action as required
- notify the ATO within 28 days of any changes to the
  - membership of the fund, or trustees or directors of the corporate trustee
  - name of the fund
  - contact person and their contact details
  - postal address, registered address or address for service of notices for the fund
- notify the ATO in writing within 21 days if the fund becomes an Australian Prudential Regulation Authority (APRA) regulated fund.

**DECLARATION**

By signing this declaration I acknowledge that I understand my duties and responsibilities as a trustee or director of the corporate trustee of the self-managed superannuation fund named on this declaration (or if the fund's name changes, that name). I understand that:

- I must ensure this document is retained for at least 10 years or while I remain a trustee or director of the corporate trustee (whichever is longer) and, if I fail to do this, penalties may apply.
- Administrative penalties can be imposed on me for not complying with the legislation
- I may have to make this document available for inspection by a member of staff of the ATO and, if I fail to do this, penalties may apply.
- I do not have access to the government's financial assistance program that is available to trustees of APRA regulated funds in the case of financial loss due to fraudulent conduct or theft.

Trustee's or director's name

Frank Martin Luviera

Trustee's or director's signature

*Frank Martin Luviera*

Date

Day: 25 / Month: 05 / Year: 2020

Witness' name (witness must be 18 years old or over)

Renée Hornhardt

Witness' signature

*Renée Hornhardt*

Date

Day: 12 / Month: 05 / Year: 2020



# Self-managed super fund trustee declaration

**I understand that as an individual trustee or director of the corporate trustee of**

Fund name

Carrothers Llovera Family Super Fund
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I am responsible for ensuring that the fund is operated in accordance with the *Superannuation Industry (Supervision) Act 1993* (SISA) and other relevant legislation. The Commissioner of Taxation (the Commissioner) has the authority and responsibility for administering the legislation and enforcing trustees' compliance with the law.

I must keep myself informed of changes to the legislation relevant to the operation of my fund and ensure the trust deed is kept up to date in accordance with the law and the needs of the members.

If I do not comply with the legislation, the Commissioner may take the following actions:

- impose administrative penalties on me
- give me a written direction to rectify any contraventions or undertake a course of education
- enter into agreements with me to rectify any contraventions of the legislation
- disqualify me from being a trustee or director of a corporate trustee of any superannuation fund in the future
- remove the fund's complying status, which may result in significant adverse tax consequences for the fund
- prosecute me under the law, which may result in fines or imprisonment.

**Sole purpose**

I understand it is my responsibility to ensure the fund is maintained for the purpose of providing benefits to the members upon their retirement (or attainment of a certain age) or their beneficiaries if a member dies. I understand that I should regularly evaluate whether the fund continues to be the appropriate vehicle to meet this purpose.

**Trustee duties**

I understand that by law I must at all times:

- act honestly in all matters concerning the fund
- exercise skill, care and diligence in managing the fund
- act in the best interests of all the members of the fund
- keep records of decisions made about the running of the fund, including the appointment of professional advisers and the retirement of members and payment of benefits
- ensure that my money and other assets are kept separate from the money and other assets of the fund
- take appropriate action to protect the fund's assets (for example, have sufficient evidence of the ownership of fund assets)
- refrain from entering into any contract or do anything that would prevent me from, or hinder me in, properly performing or exercising my functions or powers as a trustee or director of the corporate trustee of the fund
- allow all members of the fund to have access to information and documents as required, including details about
  - the financial situation of the fund
  - the investments of the fund
  - the members' benefit entitlements.

I also understand that by law I must prepare, implement and regularly review an investment strategy having regard to all the circumstances of the fund, which include, but are not limited to:

- the risks associated with the fund's investments
- the likely return from investments, taking into account the fund's objectives and expected cash flow requirements
- investment diversity and the fund's exposure to risk due to inadequate diversification
- the liquidity of the fund's investments having regard to the fund's expected cash flow requirements in discharging its existing and prospective liabilities (including benefit payments)
- whether the trustees of the fund should hold insurance cover for one or more members of the fund.

**Accepting contributions and paying benefits**

I understand that I can only accept contributions and pay benefits (income streams or lump sums) to members or their beneficiaries when the conditions specified in the law and the fund trust deed have been met.

**Investment restrictions**

I understand that, as a trustee or director of the corporate trustee of the fund, subject to certain limited exceptions specified in the law, I am prohibited from:

- giving financial assistance using the resources of the fund to a member of the fund or a member's relative (financial assistance means any assistance that improves the financial position of a person directly or indirectly, including the provision of credit)
- acquiring assets (other than business real property, listed securities, certain in-house assets and acquisitions made under mergers, allowed by special determinations or acquisitions from the trustee or investment manager of another regulated super fund as a result of a breakdown of a relationship) for the fund from members or other related parties of the fund

**Carruthers Luvera Family Super Pty Ltd  
as trustee for  
Carruthers Luvera Family Super Fund**

**MINUTES OF A MEETING OF THE DIRECTORS OF THE TRUSTEE COMPANY OF THE FUND HELD  
ON THE 1<sup>ST</sup> JULY 2019.**

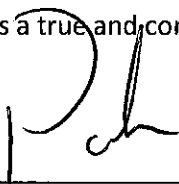
PRESENT: Peta Carruthers  
Frank Luvera

CHAIRPERSON: It was resolved that Peta be appointed chairperson of the meeting.

INVESTMENT STRATEGY: It was resolved that pursuant to Section 52(2)(f) of the Superannuation Industry (Supervision) Act 1993 the Trustee has adopted a new investment strategy for the Fund. This Investment Strategy has been approved by the members of the Fund.

CLOSURE: There being no further business the Chairperson declared the meeting closed.

Signed as a true and correct record

X  29/5/2020

Peta Carruthers  
Director – Carruthers Luvera Family Super Pty Ltd

## **Audit Representation Letter from Trustee(s)**

### **Carruthers Luvera Super Fund**

**Year ended 30 June 2019**

To the auditor,

Dear Sir,

With respect to the audit of the financial statements of the above mentioned fund for the year ended stated, the following representations are made which are true and correct to the best of my (our) knowledge and belief that will address the necessary compliance requirements of the *Superannuation Industry (Supervision) Act 1993*.

#### **Preparation of the ATO Income Tax & Regulatory Return**

The information disclosed in the annual return is complete and accurate.

#### **Sole Purpose of the Fund**

The sole purpose of the Fund is to provide retirement and/or death benefits to its members and/or beneficiaries.

#### **Accounting Policies**

All the significant accounting policies of the Fund are adequately described in the Financial Statements and the Notes thereto. These policies are consistently applied unless specifically noted in the Financial Statements and Notes.

#### **Fund Books/Records/Minutes**

All financial books, records and relevant material relating to the transactions and activities of the Fund have been made available to you, including minutes of the Trustees' meetings, the Trust Deed (as amended) and the Rules of the Fund. The Financial Statements accurately disclose the Revenue and Expenses and the full extent of the Assets and Liabilities of the Fund.

#### **Asset Form**

The assets of the Fund are being held in an acceptable form suitable for the benefit of the members of the Fund, and have been stated at their net market value.

#### **Ownership and Pledging of Assets**

1. The Fund has satisfactory title to all assets shown in the Financial Statements
2. Investments are registered in the name of Carruthers Luvera Super Fund
3. No assets of the Fund have been pledged to secure liabilities of the Fund or of any other fund or entity.

#### **Investments**

1. Investments are carried in the books at their net market value.

2. Amounts stated are considered reasonable in the current market condition, and there has not been any permanent diminution in their value below the amounts recorded in the Financial Statements.
3. There are no commitments, fixed or contingent, for the purchase or sale of long term investments.
4. Investment transactions and investments held are in accordance with the Investment Strategy, which has been determined with due regard to risk, return, liquidity and diversity.
5. The Trustee(s) have complied with all the Investment Standards stipulated in the Regulations relating to the SIS Act as amended.

### **Trust Deed Amendments**

All amendments (if any) to the Trust Deed were made in order for the Fund to comply with the SIS Act, Regulations and any other applicable legislation relating to the operation and governance of the Fund.

### **Governing Rules**

The Fund is being conducted in accordance with its Trust Deed and Governing Rules.

### **Legislative Requirements**

The Fund is being conducted in accordance with the *Superannuation Industry (Supervision) Act 1993*, and the Regulations of the said Act. Including minimum pension payments to members entitled to receive a pension.

### **Contributions**

The Trustees confirm the contributions, if any, received by the fund are within the limits imposed by the legislation, taking into account contributions paid by the members to other superannuation funds. Correspondence from the member(s) has been received and recorded by the trustees for all contributions from the member(s).

### **Use of Assets**

All assets of the Fund have been acquired and used for the sole purpose of generating retirement benefits in accordance with the *Superannuation Industry (Supervision) Act 1993*, the Trust Deed of the Fund and the Investment Strategy of the Fund.

### **Pension Payments and Withdrawal of Funds**

All pension payments (if any) and all withdrawal of funds from the accounts of the Fund have been made in accordance with statutory limitations imposed by legislation governing the Fund and all withdrawals of funds have been in accordance with the *Superannuation (Supervision) Act 1993*.

### **Trustee Responsibilities**

The Trustees are aware of their responsibilities and obligations to the Members and the various regulatory bodies that govern, administer and enforce respective applicable legislation.

### **Trustee Covenants**

The Trustee(s) have complied with all the Trustee Covenants set out in section 52 of the *Superannuation (Supervision) Act 1993*.

**Legal Matters**

The Trustees confirm you have been advised of all significant legal matters, and that the probability of any material revenue or expenses arising from such legal matters has been adequately accounted for, and been appropriately disclosed in the financial report.

**Related Parties**

All related party transactions have been brought to your attention.

**Disqualified person not to act as a Trustee**

There is no reason why any Trustee should be prohibited from acting as a Trustee of this Superannuation Fund.

**Information to Members**

Information relating to the transactions and activities of the Fund has been supplied in a timely manner.

**Meetings**

Meetings have been conducted in accordance with the Trust Deed and the requirements of the SIS Act. Resolutions and issues on which the Trustee(s) have voted, or on which they were required to vote have been passed by at least a 2/3rds majority of the Trustees.

**Subsequent Events**

Since the end of the financial year stated in the Financial Statements till the date of this letter, there have been no events or transactions that would have a material effect upon the Fund either financially or operationally.

Yours faithfully

x 

Frank Martin Luvera  
Trustee