

Investment Strategy of the Stewart Retirement Fund

Date: 30 June 2018

1. DICTIONARY

For the purposes of this Investment Strategy these words mean:

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

"SIS Legislation" includes:

- i. the Superannuation Industry (Supervision) Act 1993 (Cth) ("**SIS Act**");
- ii. legislation that the Trustee is of the view is of a superannuation nature and is applicable to the fund;
- iii. any regulations ("**SIS Regulations**") made under the above; and
- iv. 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.

2. OBJECTIVE

This investment strategy of Stewart Retirement Fund ("**Fund**") (as amended from time to time) is created in compliance with the SIS Act.

3. THE FUND

- i. The Fund complies with current laws and regulations and the rules in the Fund's trust deed ("**Trust Deed**"). It has the following investment objectives:
 - A. *Risk and Rate of Return*
 - I. 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.
 - II. The trustee of the Fund ("**Trustee**") has a strong emphasis on preserving the Fund's capital. However, many sound investments are not capital guaranteed.

- III. 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.
- IV. 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.

B. Reserving accounts

- I. Prudential management requires that a strategy be put in place so that the Trustee has the ability to pay its liabilities and obligations, whether contingent or actual, as and when they fall due. Such liabilities and expenses may either be payments to members or expenses incurred by the Fund.
- II. From time to time the Trustee may, in accordance with the Trust Deed, put in place reserve accounts for any classes, including:
 - 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); and
 - 3. miscellaneous (these include pre 12 May 2004 forgone and forfeited benefits, plus expenses and other legal provisions).
- ii. The Trustee may also create a separate and additional investment strategy for each type of Fund reserve. These may be for any lawful purpose including smoothing returns, advisory fees, accounting fees, taxes, surcharge liabilities, life and disability insurance premiums, death and disability payments and any purposes set out in Australian Tax Offices' Superannuation Contributions Ruling 1999/1.
- iii. The Trustee notes that under section 55(6) of the SIS Act it can defend against any loss or damage suffered by a member if it can show that the reserves were managed in accordance with section 52(2)(g) of the SIS Act.

4. REQUIRED RATE OF RETURN

2-3% above the average rate of inflation is what the Trustee seeks as an overall investment return for the Fund in the 3-5 year term (medium term). An investment can be for capital growth only, income only or a combination of both.

5. TRUSTEE'S OBLIGATIONS

- iv. The Trustee ensures that the Fund meets the legislated standard minimums to continue to obtain concessional taxation status on the Fund's income.
- v. 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.
- vi. The Trustee acknowledges that members' benefits are a liability of the Fund and accordingly the Trustee must consider the level of benefits required to be paid to the members of the Fund when making investment decisions. 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.

6. INVESTMENTS, METHODS AND STRUCTURES

- i. Subject to ensuring compliance with SIS Act and the Fund's Trust Deed, the Trustee 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 but not necessarily limited to (depending on the rules of the Trust Deed:
 - A. in insurance;
 - B. in Trustee investments;
 - C. in the purchase, improvement or mortgage of real property;
 - D. 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;
 - E. in shares, stocks, options, debentures, bonds, unsecured notes or other securities;
 - F. in units or sub-units of any unit trust including units in a pooled superannuation trust;
 - G. in common funds, artworks, motor vehicles (including trucks) and live stock;
 - H. in bills of exchange or other negotiable instruments;
 - I. in options, hedging contracts, futures contracts, instalment warrants, derivatives and similar securities and other financial instruments;

- J. investing in any asset using an instalment warrant;
 - K. investing in precious metals, such as gold and silver; and
 - L. in other investments, which the Trustee considers on a case-by-case basis, such as investments in agribusiness.
- ii. The Trustee 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.
 - iii. The Trustee may invest in a manner which is consistent with the Relevant Requirements.
 - iv. The Trustee may borrow money in a manner consistent with the Relevant Requirements.
 - v. The Trustee may only lend money to Members if it is consistent with the Relevant Requirements.

7. **BORROWING**

- i. To seek higher returns, the Trustee may borrow money, for any reason, including limited recourse borrowing as provided for under sections 67A and 67B of the SIS Act ("**Borrowed Moneys**") and applying the Borrowed Moneys for any permitted purpose including the purchasing, refinancing and repairs and maintenance of an Acquirable Asset (including through a trust, bare trust, warrant, limited recourse borrowing arrangement or beneficially).
- ii. 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).

8. **INSURANCE**

The Trustee cannot accept the transfer of an existing insurance policy from a member, or a relative of a member but may arrange cover for members within the Fund. Arranging insurance cover is an important part of the Fund's investment strategy to provide benefits for members and their families.

The Trustee has considered whether insurance, such as life insurance, income protection insurance and disability cover or other permissible cover should be held for one or more members. Arranging insurance cover will depend on the age, applicable premium and extent of cover appropriate and is subject to the availability of insurance in respect of a member. Whilst the Trustee can generally claim a tax deduction for the insurance premium, excluding trauma cover, the Trustee also takes into account the restricted tax deductibility of premiums for an 'own occupation' definition for disability cover.

9. DIVERSITY OF THE MEMBER'S FUND

- i. 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.
- ii. 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 Stewart Retirement Fund	Range (%) e.g. 0 - 100%
Cash	0 - 5%
Australian Fixed Interest	0 - %
International Fixed Interest	0 - %
Australian Equities (Current Benchmark: S&P ASX 200)	0 - 95%
International Equities (Current Benchmark: MSCI World Ex \$A)	0 - %
Diversified Property (other than residential)	0 - %
Residential, commercial or retail property (direct, listed or unlisted)	0 - %
Hedge funds	0 - %
Antiques and art works	0 - %
Precious metals, such as gold and silver	0 - %
Loans, loan facilities and securities	0 - %
Other investments (considered on a case by case basis) such as agribusiness	0 - %
Others:	0 - %

- iii. Where no range has been inserted above 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.

10. PAYING DEBTS

The Trustee is obliged to pay its tax obligations, expenses incurred and required benefits to members. It will do so within 31 days. The Trustee ensures that it holds sufficient cash (or readily realisable assets) to meet such obligations. Moneys must also be kept in reserve to meet the risk and reward objectives of the Fund.

11. 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.

12. INVESTMENTS

a. Cash

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

b. Australian Shares

After research and due diligence, these include listed and unlisted securities including shares, warrants, derivatives, contracts for differences, derivatives securities and managed funds.

c. 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.

d. 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 differences, derivatives securities and managed funds.

e. Property

This includes both direct and indirect investments in listed and unlisted property trusts and property securities funds.

f. Status of the Fund

The Trustee must consider the current status of the Fund with regards to the characteristics of members and the obligations of the Fund with respect to its members when determining the investment strategy.

g. Review

The Trustee is to regularly review the Fund's investment strategy and evidence this review in the minutes of Trustee meetings held during the income year.

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

Ian Stewart

Signed by the Trustee(s) 