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**Pengana Capital Ltd**
**ABN** 30 103 800 568

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**Date** 19 July 2022

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R and M Davey Super Fund  
11 McLaren Street  
FIG TREE POCKET QLD 4069

**AMMA Statement**  
**Pengana WHEB Sustainable Impact Fund**  
**01 July 2021 to 30 June 2022**
**Part A: Your Details**
**Investor Name**

Capstone Enterprises Pty Ltd &lt;R and M Davey Super Fund&gt;

**Investor Number**

101122349

**Account Holder Name** R and M Davey Super Fund

**TFN/ABN**  
Supplied

**Investor Type**  
SuperannuationFund

**Tax Residence**  
Australia

**Overseas Tax ID No**  
Not Provided

Dear Sir/Madam

Please find below the Attribution Managed Investment Trust Member Annual (AMMA) Statement for the year ended 30 June 2022 for your investment in the Pengana WHEB Sustainable Impact Fund.

The following tax return items are valid for Australian resident individual unitholders only.

If any of the details in Part A are incorrect, update your details with your trustee.

Part B Tax Return (Supplementary Section)	Summary of tax return (supplementary section) items	
	Amount (\$)	Tax return label
Share of non-primary production income	0.00	13U
Franked distributions from trusts	0.65	13C
Share of franking credit from franked dividends	0.65	13Q
Net capital gain	89.50	18A
Total current year capital gains	179.00	18H
Attributed CFC income	0.00	19K
Assessable foreign source income	0.00	20E
Other net foreign source income	0.00	20M
Australian franking credits from a New Zealand franking company	0.00	20F
Foreign income tax offsets	0.00	20O

Any amount shown above in Part B "Tax return label 13A" includes withholding tax amounts as well as section 276-105 income tax shown in Part C (if any) except for withholding tax payable on a deemed payment which is only shown in Part C (if any).

\*To work out your foreign income tax offset (FITO) entitlement, see "20 Foreign source income and foreign assets or property" or the Guide to foreign income tax offset rules 2022 on www.ato.gov.au.

For the purposes of preparing a Tax Return (Supplementary Section), any withholding tax on deemed payments of interest, dividends or Fund Payments as stated in the 'Non-resident Reporting' section of Part C should be added to the amount shown at Label 13A (in any).

For the purposes of preparing a Tax Return (Supplementary Section), any such withholding tax on Deemed Payment - (for TFN withholding purposes) as stated in the 'Resident Reporting' section of Part C should be added to the amount shown at Label 13R (if any).

<b>Part C</b>		
<b>Components of an attribution</b>		<b>Attribution/Amount (\$)</b>
<b>Australian Income</b>		
<b>Non-primary production income</b>		<b>0.00</b>
Dividend: Franked amount (Franked distributions)		0.65
<b>Capital Gains</b>		
Discounted capital gain NTAP		89.50
<b>Net capital gain</b>		<b>89.50</b>
AMIT CGT gross up amount		89.50
<b>Total current year capital gains</b>		<b>179.00</b>
<b>Foreign Income</b>		
<b>Total foreign income</b>		<b>0.00</b>
<b>Other Non-Assessable Amounts</b>		
Other capital gains distribution		89.49
		<b>Cash distribution (\$)</b>
<b>Gross cash distribution</b>		<b>178.99</b>
<b>Net cash distribution</b>		<b>178.99</b>
<b>Tax Offset</b>		
Franking credit tax offset		0.65
Foreign income tax offset		0.00
<b>AMIT Cost Base Adjustment (#)</b>		
AMIT cost base net amount- excess		0.00
AMIT cost base net amount- shortfall		0.01
<b>Non-resident Reporting</b>		<b>Tax Paid (\$)</b>
Interest exempt from withholding	0.00	0.00
Non-resident withholding amount	0.00	0.00
Non-resident member ss276-105(2)(a) or (b)	0.00	0.00
Non-resident member ss276-105(2)(c)	0.00	0.00
Managed Investment Trust Fund Payment (Other)	0.00	0.00
Managed Investment Trust Fund Payment (CBMI)	0.00	0.00
Managed Investment Trust Fund Payment (NCMI)	0.00	0.00
Managed Investment Trust Fund Payment (ExNCMI)	0.00	0.00
Managed Investment Trust Fund Payment (Total)	0.00	0.00
Deemed payment - Dividend	0.00	0.00
Deemed payment - Interest	0.00	0.00
Deemed payment - Fund Payment (Other)	0.00	0.00
Deemed payment - Fund Payment (CBMI)	0.00	0.00
Deemed payment - Fund Payment (NCMI)	0.00	0.00
Deemed payment - Fund Payment (ExNCMI)	0.00	0.00
Deemed payment - Fund Payment (Total)	0.00	0.00
Deemed payment - Royalties	0.00	0.00
<b>Resident Reporting</b>		<b>Tax Paid (\$)</b>
Deemed Payment (for TFN withholding purposes)	0.00	0.00

**Notes:**

If the abbreviations NCMI, ExNCMI or CBMI appear on the statement these refer to the following:

- NCMI - Non-Concessional MIT Income under Section 12-435 of Schedule 1 of the Taxation Administration Act 1953 ("TAA 1953")
- ExNCMI - Amounts that are excluded from NCMI due only to one of the following provisions of Schedule 1 TAA 1953: Subsection 12-437(5) (Approved economic infrastructure facility), Section 12-440 (Transitional - MIT cross staple arrangement income), Section 12-447 (Transitional - MIT trading trust income), Section 12-449 (Transitional - MIT agricultural income) or Section 12-451 (Transitional - MIT residential housing income)
- CBMI - Amounts that are, or are attributable to, fund payments from a Clean Building MIT as defined in Section 12-425 of Schedule 1 TAA 1953

NCMI/ExNCMI/CBMI information may be relevant in relation to payments made to a place outside Australia. Fund Payments may comprise NCMI, ExNCMI and/or CBMI and may be subject to different rates of non-resident withholding tax depending on the address or place for payment of the recipient and depending on the Investor Type.

"Franked distributions", if any, include franking credits in relation to those franked distributions. The amount of such franking credit will not necessarily be equal to any amount shown as the Franking Credit Tax Offset.

"Other assessable Australian income" excludes such income comprising NCMI/ExNCMI/CBMI which is shown separately if relevant.

"Discounted capital gain TARP" excludes discounted capital gains comprising NCMI/ExNCMI/CBMI which are shown separately if relevant.

"Capital gain other – TAP" excludes capital gains comprising NCMI/ExNCMI/CBMI which are shown separately if relevant. Any amounts shown as tax deducted from the Gross Cash Distribution do not include any amounts of tax payable in relation to any deemed payments (refer Non-resident Reporting section below for amounts in relation to deemed payments).

"Assessable foreign source income", if any, is grossed-up for any foreign income tax paid in relation to that foreign income. The amount of such foreign income tax paid will not necessarily be equal to any amount shown as the Foreign Income Tax Offset.

"Australian franking credits from a NZ company", if any, is the amount of Australian franking credits that comprises assessable income in relation to dividends from New Zealand franking companies. The related tax offset is the same amount.

"Other non-attributable amounts" are not included in the unitholder's income tax return and should not be used to adjust the unitholder's cost base. Cost base adjustments are stated separately in Part C.

"Foreign resident withholding tax (12-H)/Income Tax (s276-105)" - If Managed Investment Trust withholding tax is applicable to your investment, this is the sum of the amounts withheld from fund payments made for the year ended 30 June pursuant to Subdivision 12-H and Subdivision 12A-B of Schedule 1 TAA 1953. Otherwise tax may be payable under Section s276-105 of the Income Tax Assessment Act 1997. In addition these amounts will include recoupment of any such tax amounts not deducted from previous distributions. Any such recoupment amounts are also shown separately under the amount of the "Net cash distribution".

"Franking Credit Tax Offset" shows the amount of the Franking Credit Tax Offset other than the tax offset for Australian franking credits from New Zealand franking companies, which is shown separately, if relevant, in the "Foreign Income" section.

# "AMIT cost base net amount" - cost base net amount is an estimation of the adjustment to the unitholder's cost base assuming that the unitholder held the units for the full year and assuming that the unitholder is a resident individual for the income year and is not entitled to any tax exemption in relation to the income. Generally, under the AMIT regime, unitholders must (a) increase the cost base in their Fund units by their share of the AMIT's assessable income (including capital gains) and non-assessable non-exempt income and (b) decrease the cost base in their Fund units by the gross cash distribution amount distributed to them, including tax offsets. Any amount of an "AMIT cost base net amount - excess" may give rise to a capital gain or assessable amount if it exceeds the cost base of the investment. Investors should consider consulting with their tax advisor to determine any implications.

Non-resident Reporting information may be relevant to an investor who is a non-resident, an investor who is a custodian or an investor who is holding on behalf of a non-resident.

Any amount shown as "Non-resident withholding amount" comprises the amounts of dividends and/or interest (subject to non-resident withholding tax) based on information taken into account when distributions were made. Amounts taken into account when distributions were made may differ to the attribution amounts for the year as a whole.

"Managed Investment Trust Fund Payment (Other)", if any, is the amount of the Fund Payments under Subdivision 12-H and Subdivision 12-AB of Schedule 1 TAA 1953 for the year in relation to actual and deemed payments other than Fund Payments of NCMI, ExNCMI or CBMI (and the related non-resident withholding tax amount).

"Managed Investment Trust Fund Payment (Total)", if any, is the total amount of Fund Payments under Subdivision 12-H and Subdivision 12-AB of Schedule 1 TAA 1953 for the year in relation to actual and deemed payments (and the related non-resident withholding tax amount).

"Deemed Payment - Fund Payment (Other)", if any, is the deemed payment that is a Fund Payment under Subdivision 12-AB of Schedule 1 TAA 1953 (and the related non-resident withholding tax amount) other than Deemed Payment - Fund Payments of NCMI, ExNCMI or CBMI (and the related non-resident withholding tax amount).

"Deemed Payment - Fund Payment (Total)", if any, is the total amount of the deemed payment that is a Fund Payment under Subdivision 12-AB of Schedule 1 TAA 1953 (and the related non-resident withholding tax amount).

Resident Reporting information: "Deemed Payment - (for TFN withholding purposes)" includes information of any deemed payments which may be subject to withholding tax if a Tax File Number or Australian business number has not been provided.

Non-resident withholding tax and 'no TFN' withholding

If you choose to use a tax agent to prepare your income tax return, please advise them to rely on the information in this statement rather than information that may be displayed in the tax agent's pre-filling service.

**AMMA Statement**  
**Pengana WHEB Sustainable Impact Fund**  
**01 July 2021 to 30 June 2022**

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**Investor Number 101122349**

Any outstanding non-resident withholding tax or 'no TFN' withholding amounts may be deducted from future cash distributions or redemption proceeds.

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