

# Information Memorandum

JANA Alternatives Trust  
November 2019

ARSN 636 974 653 | APIR CHN2721AU



**JANA**

# Important information

## Investment restricted to wholesale clients

This Information Memorandum ('IM') in respect of the JANA Alternatives Trust ARSN 636 974 653 ('Trust') has been prepared solely in connection with the offer of Class A units in the Trust ('Units'). This IM has been prepared on a confidential basis for distribution only to wholesale clients as defined in section 761G of the Corporations Act 2001 (Cth) ('Corporations Act') in Australia. It is not a Product Disclosure Statement required to be lodged with the Australian Securities and Investments Commission ('ASIC') and it is not intended for, and should not be distributed to, any person who is a retail client for the purpose of the Corporations Act. This IM does not contain all of the information that a Product Disclosure Statement or Prospectus is required to contain.

Channel Investment Management Limited ACN 163 234 240 AFSL 439007 ('CIML', 'Responsible Entity', 'RE', 'we', 'us' and 'our') is the responsible entity and investment manager of the Trust and the issuer of this IM. CIML has appointed JANA Investment Advisers Pty Ltd ABN 97 006 717 568, AFSL 230693 ('JANA' or 'Adviser') as the adviser to the Trust.

Neither CIML nor JANA nor any of their respective related entities, associates, officers, employees or agents make any representation or warranty, express or implied, as to, or assume any responsibility or liability for, the authenticity, origin, validity, accuracy or completeness of, or any errors or omissions in, any information, statement or opinion contained in this IM or in any accompanying, previous or subsequent material or presentation except as expressly stated otherwise. To the maximum extent permitted by law, CIML and JANA and each of their respective related entities, associates, officers, employees or agents disclaims all and any responsibility or liability for any loss or damage which may be suffered by any person relying upon any information contained in, or any omissions from, this document.

By accepting this IM to review an investor agrees:

- they are a wholesale client (as defined in section 761G of the Corporations Act) or a wholesale investor (as defined in the Financial Markets Conduct Act 2013 (NZ));
- to keep the IM and its contents confidential and not provide it to other persons other than their advisers, provided they also maintain such confidentiality; and
- they have read and agreed to the information noted in this IM including this section.

Neither CIML nor JANA is obliged to accept applications and reserves absolute discretion in limiting or refusing any application.

## Reliance on the information contained in the IM

This IM has been issued by CIML without taking into account any particular person's objectives, financial situation or needs; does not purport to identify the nature of specific market or other risks associated with any investments described within it; and does not constitute any legal, taxation, investment or accounting advice. All information in this IM is indicative, is based on certain assumptions and current market conditions and is subject to change without notice. Some tables in this document may not add or calculate exactly due to rounding. Fees and costs stated in this IM are exclusive of any applicable GST.

No information contained in this IM constitutes a prediction or forecast as to the performance of any investments. Any historical information contained in this IM is provided by way of illustration only, past performance is not a guide to future performance and actual performance may differ materially. Assumptions upon which financial illustrations are based may differ from actual circumstances.

Any forward-looking statements in this IM (including statements of intention, projections and expectations of investment opportunities and investment objectives) are made only at the date of this IM based on current expectations and beliefs but involve risks, contingencies, uncertainties and other factors beyond the control of CIML or JANA which may cause actual outcomes to be materially different. Assumptions underlying such statements involve judgments which may be difficult to accurately predict. Therefore, such forward-looking statements included in this IM may prove to be inaccurate and should not be relied upon as indicative of future matters.

Provision of this document does not cause CIML or JANA or any of their respective related entities, associates, officers, employees or agents to become the financial advisor or fiduciary to the recipient. Each recipient of this IM must make its own independent assessment and

investigation of the terms of issue of the investments described in this IM, and the risks and benefits in connection with those investments as it considers appropriate. Each recipient of this document should obtain independent legal, taxation, investment, financial and accounting advice specific to their situation.

Each prospective investor in the Trust must base any decision to subscribe for or purchase investments solely upon such independent assessment, investigation and independent advice.

### **IM availability**

The offer under this IM is available to persons receiving the IM within Australia and New Zealand only. If this IM is received in New Zealand, the investor must certify to CIML they are a wholesale investor within the meaning of the Financial Markets Conduct Act 2013 (NZ) before their application into the Trust can be accepted.

This IM does not constitute an offer or invitation in any place where, or to any person to whom, it would be unlawful to make such an offer or invitation. No action has been taken to register or qualify the Units or the offer or otherwise to permit a public offering of the Units in any jurisdiction.

The distribution of this IM in jurisdictions outside Australia and New Zealand may be restricted by the laws of those jurisdictions. A failure to comply with these restrictions may constitute a violation of the laws in those jurisdictions. CIML reserves the right to change or supplement the terms and conditions in this IM. If a copy of this IM has been obtained electronically, you need to print all of it.

### **Authorised information**

No person is authorised to give any information or to make any representation about the Trust and the offer of Units which is not contained in this IM. Any such information given to an investor must not be relied upon as having been authorised by CIML or JANA or any other party mentioned in this IM.

### **No capital or performance guarantees**

This IM should be read in its entirety before making a decision to invest. An investment in Units is subject to investment risk including possible delays in repayment and loss of income and principal invested. An investment in the Trust is not a deposit with and does not represent a liability of CIML or JANA or any other person. Neither CIML nor JANA nor any of their related bodies corporate or any other person, in any way, guarantees the capital value or performance of an investment in the Trust or the performance of the Trust's investments or guarantees any particular return from the Trust, increase in value of the Trust or repayment of any amount invested in the Trust. The value of an investment in the Trust may rise or fall. CIML or JANA or any of their related bodies corporate or any other person will not provide any liquidity or secondary market support for dealing in Units.

In considering the investment objective contained in this IM, prospective investors should bear in mind that there can be no assurance that the Trust will achieve its investment objective, that the investment objective will be met or that the Trust will be able to implement its investment strategy and investment approach.

### **Confidential information**

This IM and all of the information contained in it must not be disclosed to any person or replicated in any form without the prior written consent of CIML and JANA.

# Table of Contents

1.	Key Trust information	5
2.	About CIML	7
3.	About JANA	7
4.	The Trust	7
5.	Benefits of investing in the Trust	9
6.	Risks of investing in the Trust	9
7.	How the Trust operates	10
8.	Fees and other costs	12
9.	Taxation	14
10.	Applications and redemptions	15
11.	Additional Trust information	18
12.	Privacy	19
13.	Glossary	20
14.	Contacts	21

# 1. Key Trust information

This table contains a summary of the key features of the Trust. You should read the IM in full before deciding whether to invest. Please refer to the Glossary (section 13) for definitions of terms. For further information on the Trust's key features, please refer to the sections noted below.

Trust Features	Summary	Section
<b>Responsible Entity/ Investment Manager</b>	Channel Investment Management Limited ACN 163 234 240 AFSL 439007 ('CIML').	2
<b>Adviser</b>	JANA Investment Advisers Pty Ltd ABN 97 006 717 568, AFSL 230693 ('JANA').	3
<b>Eligible unitholders</b>	Unitholders must be 'wholesale clients' (as defined in section 761G of the Corporations Act) or 'wholesale investors' (as defined in the Financial Markets Conduct Act 2013 (NZ)).	Important Information
<b>Investment style</b>	<p>The Trust will invest into multiple Underlying Funds. The Underlying Funds will vary over time, together with weightings to sub-sectors according to the opportunity set.</p> <p>The Trust will look to manage exposures to relatively liquid strategies including a focus on a range of relative value and directional investment strategies, where return outcomes are more dependent on manager skill than market beta. In addition, Underlying Fund investments could also include new emerging asset classes.</p> <p>A primary feature and objective of the Trust will be to generate returns that are not dependent on equity or bond market performance.</p>	4
<b>Investment objective</b>	<p>The performance objective for the Trust is to generate a return of Australian Cash (Bloomberg AusBond Bank Bill Index) +3% p.a. after fees and expenses over rolling three-year periods.</p> <p>In addition to the return objective, the Trust will seek to provide low correlation and low to moderate volatility relative to equity markets (referable to the MSCI World Index Hdg AUD).</p>	4
<b>Benchmark</b>	Bloomberg AusBond Bank Bill Index.	4
<b>Minimum suggested investment timeframe</b>	3-5 years	4
<b>Risk level</b>	Medium. The Trust will aim to have less volatility and lower drawdowns when compared to global equities.	4
<b>Minimum initial investment</b>	\$500,000 <sup>^</sup>	10.1
<b>Minimum account balance</b>	\$500,000. If an account balance falls below \$500,000, the investor's unitholding may be redeemed.	10.4
<b>Unit pricing</b>	Monthly – on the last Calendar Day of the month or more frequently as determined by CIML.	7.4
<b>Minimum investment and redemption amount</b>	No minimum for subsequent investment or redemptions.	10.1

Trust Features	Summary	Section
<b>Fees and costs</b>	<p><b>Establishment fee - Nil</b>  <b>Contribution fee - Nil</b>  <b>Redemption fee - Nil</b>  <b>Exit fee - Nil</b></p> <p><b>Management Fee</b> of 0.615% p.a. (inclusive of GST net of any reduced input tax credit) is payable to CIML for the management of the Trust. From this fee, CIML will also pay JANA for acting as Adviser to the Trust. The Management Fee is expressed as a percentage of the NAV of the Trust relating to Units, reflected in the Unit price and payable monthly in arrears from the Trust.</p> <p><b>Administration Cost</b> that is estimated to be 0.0513% p.a. (inclusive of GST net of any reduced input tax credit) is payable to CIML to cover costs which include custody, registry, fund administration, legal, compliance and audit fees.</p>	8
<b>Underlying Fund Investment Costs</b>	<p>There are additional costs (base costs and performance fees) applicable to investments made in the Underlying Funds, which are incurred in addition to the management costs. These costs are paid from the assets of the underlying investments and reflected in the Net Asset Value (NAV) of these investments. These underlying investment costs will vary over time.</p>	8
<b>Buy/sell spread</b>	<p>A buy/sell spread is applicable to investors wishing to apply or redeem Units. The buy/sell spread will be calculated based upon the spreads charged by the Underlying Funds. The buy/sell spread charged by the Trust will be reviewed periodically to ensure it remains in line with costs charged by the Underlying Funds.</p>	8
<b>Applications</b>	<p>Applications are to be made in writing via the completion of an application form, together with the Application Monies being received at least 10 Business Days prior to the Application Dealing Day.</p> <p><b>Application Dealing Day:</b> The effective day on which Units are recorded against the investor in the unit register which will be on the last Calendar Day of each month or more frequently as determined by CIML.</p> <p><b>Application Notice:</b> Investors wishing to apply for Units in the Trusts must submit an application form at least 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.</p> <p><b>Application Monies:</b> Cleared funds must be in the application account no later than 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.</p>	10.1
<b>Redemption</b>	<p>Redemptions from the Trust must be made via a written notice lodged with CIML at least 50 Business Days prior to the Redemption Dealing Day.</p> <p><b>Redemption Dealing Day:</b> The effective day on which the investor's Units are redeemed which will be on the last Calendar Day of each month or more frequently as determined by CIML.</p> <p><b>Redemption Notice:</b> Investors wishing to redeem from the Trust must submit a Redemption Notice at least 50 Business Days prior to the Redemption Dealing Day unless otherwise determined by CIML.</p> <p><b>Redemption Payment:</b> Redemption proceeds will be paid within 21 Calendar Days after the relevant Redemption Dealing Day unless otherwise determined by CIML.</p>	10.4
<b>Distribution</b>	<p>Annually at 30 June. Distributions are to be reinvested as additional Units or credited to the investor's nominated financial institution account.</p> <p>Market fluctuations may mean that there is no distribution for a period. All income must be distributed each financial year. CIML may vary the distribution frequency by providing investors at least 30 days' prior written notice of an intention to change the distribution frequency.</p>	7.5

<b>Reporting</b>	Unitholders will receive the following items: <ul style="list-style-type: none"> <li>• Monthly unitholding statement;</li> <li>• Distribution statement (where an annual distribution occurs);</li> <li>• Annual tax statement; and</li> <li>• Annual Trust financial statements.</li> </ul>	11.1
------------------	--	------

## 2. About CIML

CIML is a responsible entity/trustee and manager of a number of managed investment schemes. We are licensed under the Corporations Act to act as the responsible entity and investment manager of the Trust. We are responsible for managing the Trust in accordance with the Corporations Act and the constitution of the Trust. You can obtain a copy of the constitution by contacting us and requesting a copy be made available to you.

CIML has appointed JANA as the adviser to the Trust. JANA is one of Australia's leading investment consulting firms providing both traditional and implemented consulting to institutional clients.

## 3. About JANA

JANA is a majority management-owned, independent asset consultancy. JANA's structure, process and tools are built to harness the power of JANA's own research, insight and thought leadership. JANA employs a diverse team of senior investment specialists, chosen on merit and potential, whose dual research and consultancy roles are unique in the industry. They conduct thousands of research meetings every year to unearth and share the best ideas from around the world – providing JANA's clients and investors with superior advice and portfolio solutions based on first-hand knowledge. By undertaking this detailed research, JANA believes successful fund managers can be identified ahead of time and blended together in a portfolio solution for investors. JANA looks for fund managers that have complementary investment performance objective but may adopt different strategies and approaches.

## 4. The Trust

**The Trust is designed to generate returns that are not dependent on equity or bond market performance.**

The Trust invests in a range of alternative investment strategies (via investment into select Underlying Funds). The Underlying Funds will vary over time, together with weightings to sub-sectors according to the opportunity set.

It is anticipated the Trust:

- will provide a range of exposures to alternative strategies via domestic and foreign domiciled funds;
- may have an allocation to cash to assist in managing liquidity, for cash flow purposes and to help manage risk; and
- may hedge currency exposure to non-Australian dollar denominated investment funds. The Underlying Funds may themselves employ various currency management strategies in respect of their own underlying assets.

### Alternative Assets

Alternative Assets may be defined as any strategy or investment style that is not traditional such as equities

or bonds and does not fit neatly into any other asset class. The Trust will not invest into private equity, unlisted property or infrastructure assets (which are often categorised under the alternatives investment category) due to the liquidity constraints of these investments.

### Portfolio construction

The Trust's portfolio construction will focus on blending a variety of investment strategies and leading fund managers to achieve the performance objective. Generally, the Trust will invest in a minimum of four Underlying Funds. The Underlying Fund selection is driven by JANA's proprietary research and draws on its significant in-house experience in selecting alternative strategies.

### Underlying Fund selection

JANA's approach to identifying successful fund managers requires it to fully understand the fund manager's investment process, the capability of the personnel, the discipline employed and most importantly, the areas of outstanding qualities.

Each fund manager is assessed by JANA against key investment criteria including its:

- Investment philosophy
- People
- Process
- Performance
- Price
- Investment operations and compliance arrangements

When creating multi-manager portfolios, JANA uses sophisticated modelling to blend its preferred fund managers. This combination of fund managers is designed to support each portfolio's investment objective. JANA then regularly monitors the fund managers and allocations, so that refinements can be made to meet changing circumstances.

Key investment features	
<b>Investment return objective</b>	The performance objective for the Trust is to generate a return of Australian Cash (Bloomberg AusBond Bank Bill Index) +3% p.a. after fees and expenses over rolling three-year periods.  In addition to the return objective, the Trust will seek to provide low correlation and low to moderate volatility relative to equity markets (referable to the MSCI World Index Hdg AUD).
<b>Benchmark</b>	Bloomberg AusBond Bank Bill Index.
<b>Investment style</b>	The Trust invests in a range of alternative investment strategies via investment into select Underlying Funds (generally a minimum of four).
<b>Minimum suggested timeframe to invest</b>	3-5 years.
<b>Indicative asset allocation ranges</b>	The Trust will invest in a wide variety of alternative investment strategies.
<b>Risk level</b>	Medium. The Trust will aim to have less volatility and lower drawdowns when compared to global equities.
<b>Capacity</b>	There are no practical limitations on capacity.
<b>Authorised investments</b>	The following authorised investments are held by the Trust: <ul style="list-style-type: none"> <li>• Investments in the Underlying Funds; and</li> <li>• Cash (including any derivative instruments used to hedge foreign currency).</li> </ul> Authorised investments of the Underlying Funds include but are not limited to: <ul style="list-style-type: none"> <li>• Australian and global listed securities;</li> <li>• Domestic and foreign domiciled funds;</li> <li>• Cash and cash equivalents; and</li> <li>• Derivatives.</li> </ul> Any foreign denominated Underlying Funds will be hedged back into AUD at the Trust level.
<b>Derivatives</b>	Derivatives are permitted to be utilised by the Underlying Funds. It is expected that the Underlying Funds will use derivatives including options, swaps and futures, in order to manage risk and exposures.  Derivatives are generally used to manage the foreign exchange exposure of the Trust – please refer to the item 'currency hedging' below.
<b>Currency hedging</b>	At the Trust level, foreign currency exposure will generally be hedged back into AUD.
<b>Restrictions</b>	At the Trust level, no borrowing, short selling, or leverage is permitted. However, it should be noted the Underlying Funds may use these strategies to reduce risk or enhance returns.  The Trust will not invest in private equity, unlisted property or infrastructure assets due to the liquidity constraints of these investments.



## 5. Benefits of investing in the Trust

The Trust employs investment strategies, that are generally only available to institutional investors, which utilise JANA's manager research to select and access quality world-class managers and their strategies. The Trust will utilise a range of sophisticated investment styles to create a diversified portfolio. These investment strategies as a total portfolio are designed to generate returns independent of overall equity and bond market movements. An investment in the Trust along side equity and bond market strategies is expected to provide valuable diversification benefits reducing an investor's overall portfolio risk and volatility.

## 6. Risks of investing in the Trust

Investors need to understand the investment risks involved before investing in the Trust.

All investments carry risk. Different strategies can carry different levels of risk, depending on the assets that make up that strategy. Assets with the highest long-term returns may also carry the highest level of short-term risk. The value of investments and the level of returns will vary. Future returns may differ from past returns and past performance is not a reliable guide to future performance.

Neither CIML, JANA, their directors, associates nor any of their related bodies corporate guarantee the success of the Trust, the repayment of capital or any particular rate of capital or income return. Investments in the Trust are not guaranteed or underwritten by CIML or JANA or any other person or party and you may lose some or all of your investment.

Some of the key risks that may impact the value of your investment in the Trust are outlined below.

### Market risk

Movements in financial markets due to economic, environmental or political conditions, or from general market sentiment, will result in the value of the Trust's underlying assets, and hence the value of your investment, moving up or down.

### Inflation risk

There is a risk that the rate of inflation may exceed the net after-tax return from your investment. Thus, the purchasing power of an investment may not keep pace with inflation.

### Interest rate risk

Changes in official interest rates can have a positive or negative impact directly and indirectly on investment values or returns.

### General investment risk

Investment in shares, in general, carries a higher level of risk than investments in many other asset classes such as cash or fixed interest.

### Company specific investment risk

Investments in shares in a company can fall in value for many reasons such as changes in internal operations, management or the business environment in which the company operates. These factors may not be predictable or identifiable prior to their impact on the market value of shares.

### Derivative risk

The Trust uses derivatives for the purposes of hedging foreign currency. Further risk disclosure is discussed under "Foreign currency risk".

It is expected that the Underlying Funds will use derivatives including options, swaps and futures in order to manage risk and exposures. The value of derivatives can be influenced by a number of factors, and risks associated with their use include movements in the value of the underlying assets, difficulty in liquidating the derivative and counterparty risk.

### Foreign currency risk

Although the foreign currency exposure of the Trust is generally hedged, the hedge may not provide complete protection from adverse currency movements. Currency markets can be extremely volatile and are subject to a range of unpredictable forces.

### Foreign investment risk

Additional risks may arise when investing overseas, including changes in foreign exchange control regulations, foreign tax legislation and withholding tax and government policy. Additionally, differences in accounting, legal, securities trading and settlement procedures can also impact on the value of the Underlying Fund's investments and the value of the Trust's investments in the Underlying Funds.

### Counterparty and service provider risk

Default by any of the Trust's counterparties or key service providers (e.g. the fund administrator) may cause losses to the Trust.

## Underlying Funds and responsible entity risk

Being a fund of funds structure, the success of the Trust depends upon the Underlying Funds effectively managing their investments so that the investment objectives of the Trust are achieved. Matters such as the Underlying Funds' loss of key staff, the replacement of CIML as responsible entity or JANA as adviser to the Trust, or the failure of either CIML or the Underlying Funds to perform as expected may negatively impact returns, risks and/or liquidity.

## Liquidity risk

Investments may be difficult or impossible to sell, either due to factors specific to that security, or to prevailing market conditions. Liquidity risk may mean that an asset is unable to be sold or the Trust's exposure is unable to be rebalanced within a timely period and at a fair price, potentially resulting in delays in redemption processing, or even the suspension of redemptions. If we are required to process a large redemption or application, the exposure of the Trust to particular investments, sectors or asset classes may be altered significantly due to the security sales or purchases required.

## Redemption risk

Redemption risk is the risk that the usual timeframe for redemption requests is not met, or the Responsible Entity suspends redemptions from the Trust due to severe adverse market conditions.

## Operational risk

Operational risk is the risk of loss or damage resulting from inadequate or failed internal processes, people and systems or from external events. The RE or the

Trust may experience losses, adverse regulatory consequences or reputational damage due to a variety of operational risks, including inadequate or failed internal or external processes, people or systems, internal or external fraud, cyber security attacks or cyber incidents including deliberate or unintentional events, errors by counterparties under outsourcing arrangements and inadequate business continuity planning, and key person risk.

The extent of exposure to losses from the operational risks of parties not under, as applicable, the RE's, or the Underlying Fund's control, may be determined, in part, by applicable law and/or contractual provisions that allocate or limit liability. The RE manages operational risk through the oversight arrangements, systems, procedures and policies which each has established as part of its governance, risk management framework and compliance management system.

## Regulatory risk

The value of some investments may be adversely affected by changes in government policies, regulations and laws, including tax laws and laws affecting managed investment schemes.

## Terrorist action risk

There is a risk of terrorist attacks causing significant loss of life and property and damage and disruptions in global markets. Economic and diplomatic sanctions may be in place or imposed on certain states and military action may be commenced. The impact of such events is unclear but could have a material effect on general economic conditions and market liquidity which may in turn adversely affect the Underlying Funds and its investments, and consequently, the Trust and its unitholders.

# 7. How the Trust operates

## 7.1 Trust structure

The Trust is a registered managed investment scheme. When you invest in the Trust, your money will be pooled with that of other investors. Your share of the managed investment scheme is worth the total value of the assets in the scheme divided into 'Units'. Each Unit gives the investor a beneficial interest in the Trust as a whole, but not in any particular asset of the Trust. Holding Units does not give an investor the right to participate in the management or operation of the Trust. Each Unit offered or issued under this IM is of equal value and identical rights are attached to all such Units.

The RE has a discretion to make changes to the Trust, which may include termination of the Trust. There are certain changes to the Trust that may be made without prior notice including changes to the investment strategy, Underlying Fund selection and asset allocation of the Trust. If there are any changes considered to be materially adverse, we will provide prior notice. Where the changes are not materially adverse, we will provide

notification of the changes on our website at [www.ciml.com.au](http://www.ciml.com.au).

## 7.2 Valuation of assets

The assets of the Trust are valued by the fund administrator and the Trust's NAV is calculated in accordance with the constitution of the Trust. The value of the Trust will be decreased by the amount of any liability owing by the Trust, such as distributions to investors, the Management Fee and Administration Cost payable to CIML, provisions and contingent liabilities. The fund administrator values the Trust assets in accordance with standard market practice and market prices are generally electronically sourced from third party vendors.

Where no independent pricing source is available to value an asset, the fund administrator and CIML will liaise with each other to determine the value of the asset in accordance with acceptable industry standards.

## 7.3 Liquidity

Redemption from the Trust is available on a monthly basis, or more frequently if determined by CIML, with at least 50 Business Days' written notice (or such shorter period as determined by CIML). Please refer to section 10.4 'Redemptions' for further information.

## 7.4 Unit pricing

Investors in the Trust will be issued a number of Units depending on their initial investment (calculated by dividing the amount invested by the applicable issue Unit price). When funds are redeemed from the Trust, they are redeemed at the relevant redemption Unit price for the Trust. The Unit price is calculated by dividing the NAV of the Trust (determined by the net market valuation of assets owned, less all liabilities held, including fees, provisions and accrued expenses in accordance with the Trust's constitution) divided by the number of Units on issue. The issue price is calculated by taking the NAV per Unit plus any applicable buy spread. The redemption Unit price is calculated by taking the NAV per Unit minus any applicable sell spread. Information on buy/sell spreads is provided in section 8 'Fees and other costs'.

Unit prices are generally finalised and published by the 15th Business Day following the last Calendar Day of the month to which the Unit price relates, although CIML may elect to calculate Unit prices more frequently. Unit prices are typically calculated using the NAV of the Trust for that last Calendar Day of the month, unless otherwise calculated by the fund administrator. In calculating the NAV of the Trust, CIML, the fund administrator or their affiliates may rely upon, and will not be responsible for the accuracy of, financial data furnished to it by third parties including automatic processing services, brokers, market makers or intermediaries and any fund administrator or valuations agent of other collective investments into which the Trust invests. CIML may also use and rely on industry standard financial models in pricing any of the Trust's securities or other assets.

CIML has a policy for the unit pricing discretions we use in relation to the Trust for the purposes of Class Order 13/657. The unit pricing policy and discretions exercised by CIML are available from us free of charge upon request.

## 7.5 Distributions

### When are distributions paid?

The Trust generally distributes income annually at 30 June and this distribution can be reinvested as additional Units or credited to the investor's nominated financial institution account. The investor's instruction as to how distribution payments are either paid or reinvested is initially made via the completion of the Trust application form.

Market fluctuations may mean that there is no distribution for a period. All income must be distributed each financial year. CIML may vary the distribution

frequency by providing investors at least 30 days' prior written notice of an intention to change the distribution frequency.

### How will my distributions be paid?

On the application form you may nominate to re-invest your income as additional Units, or to receive your income by direct credit to your bank account. Distribution payments are generally paid within 30 Calendar Days of the calculation date. However, in some circumstances, payments could take longer. Should you wish to subsequently change your election, these details must be provided with 10 Business Days' notice prior to the requested date of change via a change of details form which is available by contacting [clientservices@ciml.com.au](mailto:clientservices@ciml.com.au).

All income distributions may be liable to income tax. Please consult your tax advisor for further information.

### How is the distribution calculated?

The net taxable income of the Trust for each distribution period is calculated at the end of the distribution period. In the event that you have an investment in the Trust at the close of business on the last day of the period, you are entitled to a share of the Trust's net income for that period in proportion to the number of Units held. If you redeem your investment on or before the last day of the distribution period, you will not receive a separate income payment for the redeemed investment for that income period. However, any income of the Trust since the beginning of the distribution period will be reflected in the redemption Unit price of the Trust.

### Special distribution

In unusual circumstances, such as large investor transactions, CIML may, at its absolute discretion, make a special distribution other than at the end of a distribution period to all investors in the Trust. This is to ensure that the taxable income of the Trust is distributed equitably among the unit holders in that Trust who remain at the end of the distribution period and those who redeem prior to the end of the distribution period.

## 7.6 Different classes

This IM applies to Class A Units in the Trust. Where permitted under the Trust's constitution, we may issue more than one class of units in the Trust under a separate information memorandum or offer document, with different applicable fees and possibly other different conditions of issue. We treat all investors within a class of units equally and all investors in different classes of units fairly.

## 8. Fees and other costs

### 8.1 Fees and costs table

This section sets out the fees and other costs that you may be charged.

Taxes are set out in section 9 'Taxation'.

Type of fee or cost	Amount <sup>1</sup>	How and when paid
<b>Fees when your money moves in or out of the Trust</b>		
<b>Establishment fee</b> The fee to open your investment.	Nil	Not applicable
<b>Contribution fee</b> The fee on each amount contributed to your investment.	Nil	Not applicable
<b>Redemption fee</b> The fee on each amount you take out of your investment.	Nil	Not applicable
<b>Exit fee</b> The fee to close your investment.	Nil	Not applicable
<b>Management costs<sup>3</sup></b>		
<b>The fees and costs for managing your investment</b>	1. Management Fee of 0.615 p.a. <sup>2</sup>	The Management Fee is expressed as a percentage of the NAV of the Trust relating to Units, reflected in the Unit price and payable monthly in arrears from the Trust.
	2. Administration Cost of 0.0513% p.a. <sup>2</sup>	The Administration Cost is expressed as a percentage of the NAV of the Trust relating to Units, reflected in the Unit price and payable monthly in arrears from the Trust. CIML will pay the expenses of the Trust (other than the extraordinary expenses and prime brokerage costs) from the Administration Cost. Extraordinary expenses are paid from the Trust assets as and when incurred.

1. In addition to these amounts, a buy/sell spread may apply (see 'Transactional and operational costs' under section 8.2).

2. All figures disclosed include the net effect of GST and RITC.

3. Management costs exclude Underlying Fund investment costs. For more information on the management costs, see section 8.2 'Additional explanation of fees and costs'.

## 8.2 Additional explanation of fees and costs

Set out below is additional information about management costs of the Trust, transactional and operational costs, and other information about fees and other costs in relation to the Trust.

### Management Fee

CIML is entitled to a Management Fee of 0.615% p.a. (inclusive of GST and net of any reduced input tax credit) for managing and operating the Trust. Under an agreement, JANA has been appointed by CIML to advise on the assets of the Trust and is entitled to a fee for doing so, which CIML pays from its Management Fee. The Management Fee in this IM refers to CIML's management fee and JANA's advisory fee. The Management Fee is calculated and accrued monthly based on the NAV of the Trust.

The Management Fee is payable monthly in arrears out of the assets of the Trust. For the purposes of the table set out in section 8.1, the Management Fee is expressed as a percentage of the Trust's net assets, and includes GST and any applicable stamp duty, less reduced input tax credits.

### Administration Cost

The Administration Cost of 0.0513% p.a. (inclusive of GST and net of any reduced input credit) of the NAV of the Trust accrues daily and is payable to CIML monthly in arrears. CIML pays the expenses incurred in administering the Trust (other than extraordinary or unusual expenses and transaction costs) from this Administration Cost. Some of these expenses include:

- compliance and administration costs for the Trust (e.g. audit, registry, fund administration, legal and taxation services);
- custody fees; and
- fees and expenses in relation to tasks outsourced by CIML.

### Underlying Fund investment costs

There are additional costs (base costs and performance fees) applicable to investments made in the Underlying Funds, which are charged in addition to the Management Costs. These costs are paid from the assets of the underlying investments and reflected in the net asset value of these investments. These underlying investment costs will vary over time.

### Transactional and operational costs

In managing the assets of the Trust, the Trust may incur transactional and operational costs such as clearing costs, buy and sell spreads on the Underlying Funds, bank charges, brokerage and applicable stamp duty when assets are bought and sold.

Transactional costs which are incurred other than in connection with applications and redemptions, arise through the day-to-day trading of the assets and are reflected in the Trust's Unit price. As these costs are factored into the asset value of the Trust's assets and reflected in the Unit price, they are an additional implicit cost to the investor and are not a fee paid to CIML. Transaction costs are not included in the management costs. Instead they are recovered from the assets of the Trust as and when they are incurred and therefore are an additional cost to you.

Transaction costs incurred as a result of investors coming into and out of the Trust may be accounted for in the buy/sell spread. A buy/sell spread is applicable to investors wishing to apply or redeem Units. This is an additional cost to the investor but is incorporated into the Unit price and incurred when an investor invests in or redeems Units and is not separately charged to the investor.

The buy/sell spread for the Trust will be calculated based upon the spreads charged by the Underlying Funds. The Buy/Sell spread charged by the Trust will be reviewed periodically to ensure it remains in line with costs charged by the Underlying Funds.

### Changes to fees

At our discretion and without the consent of investors, CIML may change the fees set out in this IM up to the amounts set out in the Trust's constitution, or apply such fees set out in the Trust's constitution that are not currently charged. CIML will give investors at least 50 Business Days' prior written notice of any intention of CIML to increase the Management Fee or Administration Cost or introduce a performance fee or a termination fee.

### Differing fees

There may be differing fee arrangements for investors in different classes. Management Fees may be negotiated with investors. These arrangements reflect terms privately agreed with each investor. Neither JANA nor CIML is under any obligation to make arrangements on these terms available to all other investors.

### Extraordinary fees

Generally, expenses incurred in managing the Trust will be paid from the Administration Cost referred to above. However, if extraordinary or unusual expenses are incurred, we may choose to recover these costs from the Trust. Examples of this type of expense include the costs involved in:

- convening of an investors' meeting;
- termination of the Trust;
- amending the Trust constitution;
- defending or bringing of litigation proceedings; and
- replacement of CIML as the responsible entity of the Trust.

### Performance fee under the constitution

The Trust does not intend to nor currently charges a performance fee. However, the Trust constitution does permit the responsible entity to charge a performance fee. CIML will give investors at least 50 Business Days' prior written notice of any intention to introduce a performance fee.

The Trust constitution provides for a performance fee to be charged of up to 38.875% (inclusive of GST net of any reduced input tax credit) of the amount by which the monthly change in the unit value exceeds the benchmark (being the monthly change in the performance of the Bloomberg AusBond Bank Bill Index plus 3% p.a.). The performance fee is calculated monthly and, if payable, payable six monthly in arrears.

## 9. Taxation

There are tax implications when investing in, withdrawing and receiving income from the Trust. CIML cannot give tax advice and recommend that you consult your professional tax adviser as the tax implications of investing in the Trust can impact investors differently. Below is a general outline of some key tax considerations for Australian resident investors. This information is based on our current interpretation of the relevant taxation laws and does not consider an investor's specific circumstances. As such, investors should not place reliance on this as a basis for making their decision as to whether to invest.

Income earned by the Trust, whether distributed or reinvested, should form part of an investor's assessable income in the year of entitlement or attribution. The timing of when the Trust's net income is brought to account for tax purposes may be different to when amounts are distributed to you, so that you may be required to pay tax on income that has not yet been, or may not be, distributed to you.

At the end of the Trust's tax year we will send to you the details of assessable income, capital gains or tax credits comprising the distributions to investors each year, together with any other relevant tax information required to complete your income tax return.

The Trust will seek to pass on any benefits of franking credits in respect of distributions including franked dividends from the Trust. Investors receiving distributions including franked dividends will be required to include their share of dividend income and franking credits in their assessable income.

### Attribution Managed Investment Trust ('AMIT')

The Trust has elected to become an Attribution Managed Investment Trust ('AMIT'). As an AMIT, all determined trust components of each particular category or character (i.e. relating to assessable income, exempt income, non-assessable non-exempt income and tax offsets) are attributed to members on a fair and reasonable basis in accordance with the Trust's constitution each year so that the Trust itself is not subject to tax. As an investor you will be assessed for tax on your attributed share of the Trust's taxable income, including any net capital gains.

### Capital gains tax

Your assessable income for each year includes net capital gains (i.e. after offsetting capital losses). Two sources of capital gains tax may include:

- a component of the Trust net income distributed to investors in the Trust; and
- the withdrawal of an investor from the Trust (including the redemption of Units).

Individuals, trusts and complying superannuation entities may be eligible for CGT concessions in relation to capital gains made with respect to their units where they have held those units for at least 12 months.

If you hold your Units on revenue account, gains and

losses will be taxable as ordinary income or allowed as a deduction, as the case may be, and will not qualify for the CGT discount.

### Goods and services tax (GST)

Unless otherwise stated, the fees and other costs shown in this IM include the net effect of Goods and Services Tax ('GST') and any applicable stamp duty, less reduced input tax credits ('RITC'). The rate of GST and any other taxes may change if the relevant law changes.

Investors should not be directly subject to GST when applying for or withdrawing Units. However, the Trust may incur GST as part of the expenses of the Trust. The Trust may then be entitled to claim RITCs for GST incurred on certain expenses.

### Foreign tax offsets

Australian residents are required to include in their assessable income their share of any foreign income received by the Trust which forms part of the Trust's net income. Investors will normally be entitled to a tax offset (or credit) in respect of foreign taxes paid in respect of foreign source income received by the Trust and distributed to them.

### Tax file number ('TFN') and Australian Business Number ('ABN')

It is not compulsory for investors to provide their TFN or ABN, and it is not an offence if you decline to provide them. However, unless exempt, if an investor does not provide their TFN or ABN, tax will be deducted from income distributions at the highest personal marginal rate plus the Medicare levy (and any other levies required to be withheld from distributions from time to time). The ABN, TFN or an appropriate exemption can be provided on the Application Form when making an initial investment. The collection of TFNs is authorised and their use is strictly regulated by tax and privacy laws.

### Taxation of financial arrangements ('TOFA')

Generally, TOFA applies to the classification of gains and losses from financial arrangements and how they are recognised for income tax purposes. The TOFA rules may apply to the Trust.

Generally, investors are not directly subject to TOFA unless they have elected for the TOFA rules to apply. Regardless of this, you should seek your own advice in relation to the applicability of TOFA as applicable to your particular circumstances.

# 10. Applications and redemptions

## 10.1 Applications

### How to apply

A completed application form is an instruction to invest in the Trust and the Application Monies must be received at least 10 Business Days prior to the Application Dealing Day, unless otherwise determined by CIML. An application form is available by contacting CIML Client Services.

### CIML Client Services

Telephone | 1800 940 599  
Email | [clientservices@ciml.com.au](mailto:clientservices@ciml.com.au)  
Post | CIML | GPO Box 206 QLD 4001

Once you have completed the application form (having read the investor declaration and authorisation), please have the application form signed by the authorised signatories for the account and then return the completed form to CIML Client Services. Application monies should be sent by electronic transfer to the Trust's application account noted on the application form.

Key information regarding the application process is set out below:

<b>Application Dealing Day</b>	The effective day on which Units are recorded against the investor in the unit register which will be on the last Calendar Day of each month or more frequently as determined by CIML.
<b>Application form</b>	Investors wishing to apply for Units must submit an application form at least 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.
<b>Application Monies</b>	Cleared funds must be in the application account no later than 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.

For an application form to be valid, it must be correctly completed, and it must comply with the designated minimum investment amounts and be appropriately signed by the applicant(s). However, CIML may, at its discretion, accept amounts less than the minimum initial investment amount. There is no minimum amount for subsequent, additional investments.

If, for any reason, we are unable to process your application (for example, the application form is incomplete or incorrectly completed or we are not satisfied that we have received the necessary proof of identification requirements to meet our obligations under AML Requirements as set out in section 10.2 and in the application form), the Application Monies will be held on trust by us in a non-interest bearing applications account for up to 30 days (while we endeavour to verify your identification information or obtain any necessary outstanding information) after which we will return the Application Monies to you. No interest is received on Application Monies, including monies for additional investments, and no interest will be paid to you if for any reason your application can not be accepted.

We reserve the right not to accept (wholly or in part) any application for any reason or without reason. If we refuse to accept an application, any Application Monies received from you will be returned to you without interest.

### Additional investment

If you are an existing unitholder in the Trust you may apply for additional Units by completing an 'additional unit' application request form which can be obtained by contacting CIML Client Services. It is not necessary for you to complete another full application form. Please insert your investor number, name and personal details as well as your additional investment amount into the spaces provided on the form.

Additional investments can be made (in accordance with the application process and timings set out in this section), by providing us with a completed additional unit application request form, together with your electronic funds transfer (EFT) confirmation. The additional investment amount will be added to your existing investment in the Trust. Additional investments are made on the basis of the IM current at the time of investment. The latest IM is available by contacting CIML Client Services.

## 10.2 Anti-Money Laundering and Counter-Terrorism Financing

The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) ('AML Act') and other applicable anti-money laundering and counter terrorism laws, regulations, rules and policies which apply to CIML ('AML Requirements'), regulate financial services and transactions in a way that is designed to detect and prevent money laundering and terrorism financing. The Australian Transaction Reports and Analysis Centre ('AUSTRAC') enforces the AML Act. In order to comply with the AML Requirements, CIML is required to, amongst other things:

- verify your identity and source of your application monies before providing services to you, and to re identify you if we consider it necessary to do so; and
- where you supply documentation relating to the verification of your identity, keep a record of this documentation for 7 years.

CIML and the fund administrator as its agent (collectively the Entities) reserve the right to request such information as is necessary to verify your identity and the source of the payment. In the event of delay or failure by you to produce this information, the Entities may refuse to accept an application and the Application Monies relating to such application or may suspend the payment of redemption proceeds if necessary, to comply with AML Requirements applicable to them. Neither the Entities nor their delegates shall be liable to you for any loss suffered by you as a result of the rejection or delay of any subscription or payment of redemption proceeds.

The Entities have implemented a number of measures and controls to ensure they comply with their obligations under the AML Requirements, including carefully identifying and monitoring investors. As a result of the implementation of these measures and controls:

- transactions may be delayed, blocked, frozen or refused where the Entities have reasonable grounds to believe that the transaction breaches the law or sanctions of Australia or any other country, including the AML Requirements;
- where transactions are delayed, blocked, frozen or refused the Entities are not liable for any loss you suffer (including consequential loss) caused by reason of any action taken or not taken by them as contemplated above, or as a result of their compliance with the AML Requirements as they apply to the Trust; and
- CIML or the fund administrator may from time to time require additional information from you to assist in this process.

The Entities have certain reporting obligations under the AML Requirements and are prevented from informing you that any such reporting has taken place. Where required by law, an entity may disclose the information gathered to regulatory or law enforcement agencies, including AUSTRAC. The Entities are not liable for any loss you may suffer as a result of their compliance with the AML Requirements.

## 10.3 Foreign Account Tax Compliance Act ('FATCA') and Common Reporting Standard ('CRS')

The United States of America has introduced rules known as FATCA which are intended to prevent US persons from avoiding tax. Broadly, the rules may require the Trust to report certain information to the Australian Taxation Office ('ATO'), which may then pass the information on to the US Internal Revenue Service ('IRS'). If you do not provide this information, we will not be able to process your application.

In order to comply with these obligations, CIML will collect certain information about you and undertake certain due diligence procedures to verify your FATCA status and provide information to the ATO in relation to your investment in the Trust.

The Australian Government has implemented the OECD Common Reporting Standards Automatic Exchange of Financial Account Information by way of CRS. CRS, like the FATCA regime, requires banks and other financial institutions to collect and report to the ATO.

CRS requires certain financial institutions to report information regarding certain accounts to their local tax authority and follow related due diligence procedures. The Trust is expected to be a 'Financial Institution' under the CRS and intends to comply with its CRS obligations by obtaining and reporting information on relevant accounts (which may include your Units) to the ATO. In order for the Trust to comply with its obligations, we will request that you provide certain information and certifications to us. We will determine whether the Trust is required to report your details to the ATO based on our assessment of the relevant information received. The ATO may provide this information to other jurisdictions that have signed the "CRS Competent Authority Agreement", the multilateral framework agreement that provides the mechanism to facilitate the automatic exchange of information in accordance with the CRS. The Australian Government has enacted legislation amending, among other things, the Taxation Administration Act 1953 (Cth) to give effect to the CRS.

## 10.4 Redemptions

### How to redeem

You can redeem from your investment by sending us a completed redemption request form which is available by contacting CIML Client Services. Redemptions from the Trust must be made via a redemption request form lodged with CIML at least 50 Business Days prior to the Redemption Dealing Day, unless otherwise determined by CIML (please refer to the key information below). Units will be redeemed based on the exit price as determined by the month end unit price. As part of the redemption proceeds, investors will receive their share of any net income of the Trust for the period of time during which their Units were on issue in the relevant distribution period. These proceeds are included in the Unit price. Investors will also receive their share of the capital value of the Trust upon redemption.



Key information regarding the redemption process is set out below:

<b>Redemption Dealing Day</b>	The effective day on which the investor's Units are redeemed which will be on the last Calendar Day of each month or more frequently as determined by CIML.
<b>Redemption Notice</b>	Investors wishing to redeem from the Trust must submit a Redemption Notice at least 50 Business Days prior to the Redemption Dealing Day unless otherwise determined by CIML.
<b>Redemption Payment</b>	Redemption proceeds will be paid within 21 Calendar Days after the relevant Redemption Dealing Day unless otherwise determined by CIML.
<b>Redemption Gate</b>	In ordinary circumstances, redemption requests will be met as set out above. However, in certain circumstances, redemption requests may be limited to 25% of an investor's existing unitholding in the Trust, for each Redemption Dealing Day. The Trustee retains the right to enforce a Redemption Gate for amounts exceeding 25% of each investor's existing unitholding.  It is expected that the Trustee will only initiate a Redemption Gate in unusual circumstances and for the overriding benefit of all existing investors in the Trust. Post the implementation of a Redemption Gate, any of the investor's remaining Units which were not able to be redeemed would be subject to future Redemption Dealing Days as prescribed by the Trust's redemption process.

There is no minimum amount for redemption requests. Redemption requests must be signed by the appropriate authorised signatories. Any cheques and bank accounts must be in the name/s of the investor/s as specified in the application form or as otherwise notified to CIML. Proceeds will be paid in AUD. Partial redemptions are subject to the investor maintaining a minimum balance of \$500,000. If an investor's account balance falls below \$500,000, the investor's unitholding may be redeemed. CIML will provide investors with advance notice of any compulsory redemption.

#### **Possible additional redemption restrictions**

There may be additional circumstances where your ability to redeem from the Trust is restricted. We will notify investors of any material changes to your redemption rights (such as a suspension of redemption rights) via CIML's website at [www.ciml.com.au](http://www.ciml.com.au) and [www.jana.com.au](http://www.jana.com.au). In certain circumstances we may suspend redemptions if we believe this is in the best interests of investors.

Under the Corporations Act, if the Trust ceases to be liquid we will not satisfy redemption requests and redemption from the Trust will only be possible if we make a redemption offer in accordance with the Corporations Act. We are not obliged to make such an offer. However, if we do, you are only able to redeem your investment in accordance with the terms of a current redemption offer. If an insufficient amount of money is available from the assets specified in the redemption offer to satisfy redemption requests, the requests will be satisfied proportionately amongst those investors wishing to redeem from the Trust.

#### **Transfers**

You can request a transfer of some or all of your Units to a third party by completing and signing a transfer form and providing us with any other documentation required by us or any law. You can obtain a transfer form by contacting CIML Client Services. CIML reserves the right to refuse to register a transfer of Units.

## We are here to help

Our client services team is pleased to assist you in any way we can, whether it is the provision of an account related form, a question about your AML identification, application, redemption or distribution, we are always happy to help.

We are contactable during business hours via email or by telephone:

#### **CIML Client Services**

Telephone | 1800 940 599  
Email | [clientservices@ciml.com.au](mailto:clientservices@ciml.com.au)  
Post | CIML | GPO Box 206 QLD 4001

# 11. Additional Trust information

## 11.1 Investor reporting and information

<b>Confirmation of transactions</b>	You will receive a confirmation statement whenever you transact on your account.
<b>Monthly unitholding statement</b>	You will receive a monthly statement which will provide a summary of your transactions for the month, together with your unitholding balance as at month end.
<b>Distribution statement</b>	Whenever an annual or special distribution is paid, you will receive a distribution statement setting out the distribution payment to either your nominated bank account or details of your reinvestment.
<b>Annual taxation statement</b>	You will receive an annual taxation statement to assist with the completion of your tax return.
<b>Annual financial statements</b>	At your election (as noted by you when completing the application form), you can receive the Trust's annual financial statements by email or in hard copy via post. A copy of the Trust's annual financial statements can also be downloaded (when available) at <a href="http://www.ciml.com.au">www.ciml.com.au</a> or <a href="http://www.jana.com.au">www.jana.com.au</a> .
<b>Updated IM</b>	Please contact <a href="mailto:clientservices@ciml.com.au">clientservices@ciml.com.au</a> to ensure you receive the most up to date IM.
<b>Constitution</b>	Please contact <a href="mailto:clientservices@ciml.com.au">clientservices@ciml.com.au</a> should you wish to receive a copy of these documents.
<b>Unit pricing policy</b>	
<b>Privacy policy</b>	

## 11.2 Constitution

The operation of the Trust is governed by its constitution, this IM, the Corporations Act and other laws such as the general law relating to trusts.

The constitution of the Trust addresses matters such as unit pricing, applications and redemptions, the issue and transfer of units, unitholder meetings, CIML's powers to invest, borrow and generally manage the Trust and fee entitlement and right to be indemnified from the Trust's assets.

## 11.3 Labour standards, environmental, social and ethical considerations

CIML does not explicitly take into account labour standards, environmental, social and ethical considerations in investing the Trust's assets and does not have a specific methodology for the extent to which these factors will be considered.

JANA places significant importance on the consideration of ESG factors, which is integrated into JANA's approach to investment research. JANA believes ESG is important because:

- ESG factors can impact the probability of meeting investment objectives over the long-term by affecting the sustainability of returns;

- ESG factors are another source of risk in investment portfolios that should be managed prudently;
- investment managers that effectively identify ESG factors and how such factors impact on investment returns of each investment are better placed to deliver long-term sustainable investment returns;
- pursuing investments which take into account ESG factors is consistent with JANA's perspective as a long-term investor;
- although assessment and monitoring of ESG factors does not necessarily prevent poor investment performance, it can reduce risk and thereby potentially protect and enhance wealth over the long term; and
- effective stewardship can play a role in enhancing the risk-adjusted performance of investments and thereby improve the potential to provide long term, sustainable returns for investors.

JANA's philosophy aligns with the Principles of Responsible Investment ("PRI"). JANA is an active participant in the promotion of responsible investment and has a dedicated responsible Investing team whose role is to engage with industry bodies and ensure that the firm is up to date with current thinking and practices with respect to ESG and how this relates to investment portfolios.

JANA believes that the greater monitoring and manager engagement effort is most appropriately delivered via JANA's research of and contact with investment managers. JANA ensures that investment managers are aware of their obligations with respect to responsible investing and are incorporating evaluation of ESG factors into their processes. ESG credentials form part of JANA's due diligence for an investment manager prior to selection. As part of our ongoing monitoring, we periodically survey the portfolio managers we use to ensure that they are embracing ESG principles and reflecting their words in practice.

## 12. Privacy

CIML has a Board approved privacy policy. We collect and manage your personal information in accordance with this policy, the Privacy Act 1998 (Cth) and the Australian Privacy Principles ('APP').

CIML may collect personal information from you in the application form and any other relevant forms in order to process your application, administer your investment and for other purpose permitted under the Privacy Act 1988 (Cth). Tax, company and anti-money laundering law also require some of the information to be collected in connection with an application. In some cases, we collect personal information from third parties including public sources, our related companies, referrers, brokers, agents, your adviser(s) and our service providers.

If you do not provide us with your relevant personal information, we will not be able to provide you with products or services (such as issuing you Units).

Privacy laws apply to our handling of personal information and we will collect, use and disclose your personal information in accordance with our privacy policy, which includes details about the following matters:

- the kinds of personal information we collect and hold;
- how we collect and hold personal information;
- whether collection is required or authorised by law;

### 11.4 Complaints resolution

CIML has established procedures for dealing with complaints. We aim to resolve any concerns or complaints quickly and fairly. If an investor has a concern or complaint, they can contact CIML at:

Channel Investment Management Limited

GPO Box 206  
Brisbane QLD 4001  
Phone: 1800 940 599  
Email: [clientservices@ciml.com.au](mailto:clientservices@ciml.com.au)

CIML will use reasonable endeavours to deal with and resolve the complaint within a reasonable time but in any case, no later than 45 days on receipt of the complaint.

- the purposes for which we collect, hold, use and disclose personal information;
- the entities or persons to which personal information is usually disclosed;
- how you may access personal information that we hold about you and seek correction of such information (note that exceptions apply in some circumstances);
- how you may complain about a breach of the APPs, or a registered APP code (if any) that binds us, and how we will deal with such a complaint;
- whether we are likely to disclose personal information to overseas recipients and, if so, the countries in which such recipients are likely to be located if it is practicable for us to specify those countries.

Personal information is unlikely to be disclosed to any third parties overseas.

CIML may also be allowed or obliged to disclose information by law. If an investor has concerns about the completeness or accuracy of the information CIML has about them or would like to access or amend personal information held by CIML, they can contact CIML's Privacy Officer at:

Attention: Privacy Officer  
Channel Investment Management Limited  
GPO Box 206  
Brisbane QLD 4001  
Phone: 1800 940 599

## 13. Glossary

<b>Administration Cost</b>	The cost payable to CIML to cover Trust expenses as described in section 8.
<b>Alternative Assets</b>	Any strategy or investment style that is not traditional such as equities or bonds and does not fit neatly into any other asset class.
<b>AMIT</b>	Attribution Managed Investment Trust.
<b>AML Act</b>	Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).
<b>AML Requirements</b>	Other applicable anti-money laundering and counter terrorism laws, regulations, rules and policies which apply to CIML.
<b>Application Dealing Day</b>	The effective day on which Units are recorded against the investor in the unit register which will be on the last Calendar Day of each month or more frequently as determined by CIML.
<b>Application Monies</b>	The cleared funds that must be received into the applications account no later than 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.
<b>Application Notice</b>	The submission of an application form to CIML at least 10 Business Days prior to the Application Dealing Day unless otherwise determined by CIML.
<b>ASIC</b>	Australian Securities and Investments Commission.
<b>ATO</b>	Australian Taxation Office.
<b>AUD</b>	Australian currency.
<b>Benchmark</b>	Bloomberg AusBond Bank Bill Index
<b>Bloomberg AusBond Bank Bill Index</b>	The Bloomberg AusBond Bank Bill Index is an index which is engineered to measure the Australian money market by representing a passively managed short term money market portfolio.
<b>Business Day</b>	A day other than Saturday, Sunday, a bank holiday or public holiday in Sydney, New South Wales.
<b>Calendar Day</b>	All days in a month, including weekends and holidays.
<b>CIML, Responsible Entity, RE, we, us and our</b>	Channel Investment Management Limited ACN 163 234 240 AFSL 439007.
<b>Corporations Act</b>	Corporations Act 2001 (Cth).
<b>ESG</b>	Environmental, Social and Governance.
<b>IM</b>	Information Memorandum.
<b>Management Fee/s</b>	The fee payable to CIML for the management of the Trust as described in section 8.
<b>MSCI World Index Hdg AUD</b>	The MSCI World ex Australia 100% Hedged to AUD Index is 100% hedged to the AUD by selling each foreign currency forward at the one-month forward weight. The parent index is composed of large and mid-cap stocks across 22 'developed markets' countries and its local performance is calculated in 13 different currencies.
<b>NAV</b>	Net asset value.
<b>JANA or Adviser</b>	JANA Investment Advisers Pty Ltd ABN 97 006 717 568, AFSL 230693.

<b>Redemption Dealing Day</b>	The effective day on which the investor's Units are redeemed which will be on the last Calendar Day of the month or more frequently as determined by CIML.
<b>Redemption Gate</b>	The limitation on redemption requests to 25% of an investor's existing unitholding in the Trust for each Redemption Dealing Day, exercisable by the Trustee in unusual circumstances.
<b>Redemption Notice</b>	The notice submitted by the investor at least 50 Business Days prior to the Redemption Dealing Day, unless otherwise determined by CIML.
<b>Redemption Payment</b>	The redemption proceeds which are paid within 21 Calendar Days after the relevant Redemption Dealing Day.
<b>Trust</b>	JANA Alternatives Trust ARSN 636 974 653.
<b>Underlying Fund/s</b>	The investment funds selected by the Adviser as investments for the Trust which may also include investments used to manage currency exposure and cash.
<b>Unit/s</b>	Class A unit/s in the Trust.

## 14. Contacts

### Adviser - For investment related matters

JANA Investment Advisers Pty Ltd  
 ABN 97 006 717 568, AFSL 230693

#### Address

Level 9  
 530 Collins Street  
 Melbourne VIC 3000

#### Telephone

+613 9602 5400

or

Level 6  
 255 George Street  
 Sydney NSW 2000

#### Telephone

+612 9221 4066

#### Website

[www.jana.com.au](http://www.jana.com.au)

### Responsible Entity - For Trust, unitholding and product related matters

Channel Investment Management Limited ACN 163 234 240  
 AFSL 439007

#### Address

Level 25, 1 Eagle Street  
 Brisbane QLD 4000

#### Email

[clientservices@ciml.com.au](mailto:clientservices@ciml.com.au)

#### Website

[www.ciml.com.au](http://www.ciml.com.au)

#### Telephone

1800 940 599

