North

Issue number 12, 29 September 2026

# MyNorth® Guardian Investment Options

## Product Disclosure Statement

Prepared and issued by ipac Asset Management Limited ABN 22 003 257 225, AFSL 234655.
®MyNorth is a registered trademark of NMMT Limited ABN 42 058 835 573, AFSL 234653

# MyNorth® Guardian Investment Options

## Supplementary Product Disclosure Statement

This is a Supplementary Product Disclosure Statement ('SPDS') for the MyNorth® Guardian Investment Options Product Disclosure Statement dated 29 September 2026 ('Original PDS'), issued by ipac Asset Management Limited ABN 22 003 257 225, AFSL 234655.

This SPDS must be read together with the Original PDS dated 29 September 2026, and is available on **www.northonline.com.au** or a copy can be obtained free of charge by contacting us on 133 267, Monday to Friday 8.30am - 5.30pm (Sydney time).

The purpose of this SPDS is to inform investors the North Managed Volatility Moderately Defensive Fund ('MyNorth Guardian Max 60' or 'Investment option') is no longer available and all references to this Investment Option are removed from the Original PDS.

**As at the date of this SPDS, the following changes are made to the Original PDS and these sections should be read in conjunction with the Original PDS.**

## Update to the MyNorth Guardian Investment Options

Throughout the Original PDS, all references to MyNorth Guardian Max 60 (ARSN 163 411 461, APIR IPA0169AU), information specifically related to this Investment Option (such as the 'Investment objective and Investment strategy'), references to this Investment Option in the 'Fees and other costs' section are deleted and Table 1 on page 14 of the Original PDS is replaced by the updated Table on the following page.

From 6 November 2026, the MyNorth Guardian Max 60 is no longer available for investment including new and additional investments and any reinvestment of distributions.

**Issue date**: 6 November 2026

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# Update to fees and other costs

**Table 1 on page 14 of the Original PDS is replaced by the updated Table 1 below.**

## Table 1 - MyNorth Guardian Investment Options

| Type of fee or cost | Amount | How and when paid |
|---|---|---|
| **Ongoing annual fees and costs** | | |
| ***Management fees and costs***[i] **The fees and costs for managing your investment.** | Management fees and costs range between 0.62% and 0.63% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 of the Original PDS for details) | Management fees and costs are comprised of:<br>– a **management fee**[ii] - calculated daily and paid monthly out of the Investment Option's assets and reflected in the unit price.<br>– **indirect costs**[iii] - calculated on the basis of the Responsible Entity's reasonable estimate of such costs and paid out of the Investment Option's assets or interposed vehicle's[iv] assets once the cost is incurred and reflected in the unit price. |
| ***Performance fees***[v] **Amounts deducted from your investment in relation to the performance of the product.** | Estimated performance fees are 0.00% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 of the Original PDS for details) | Paid out of the Investment Option's assets or interposed vehicle's assets when the costs are incurred and reflected in the unit price. |
| ***Transaction costs***[vi] **The costs incurred by the scheme when buying and selling assets.** | Estimated transaction costs range between 0.27% and 0.29% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 of the Original PDS for details) | Paid out of the Investment Option's assets when the costs are incurred and reflected in the unit price. The amount shown is net of any transaction costs recovered from investors via buy-sell spreads (see below). |
| **Member activity related fees and costs (fees for services or when your money moves in or out of the scheme)** | | |
| ***Establishment fee*** **The fee to open your investment.** | Nil | Not applicable |
| ***Contribution fee*** **The fee on each amount contributed to your investment.** | Nil | Not applicable |
| ***Buy/sell spread***[vi] **An amount deducted from your investment representing costs incurred in transactions by the scheme.** | Buy/sell spread ranges from 0.05% and 0.05%, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 of the Original PDS for details) | When you invest in or withdraw from a Investment Option, you may incur buy/sell spreads applicable at that time and this amount is reflected in the unit prices for that Investment Option. The buy spread is taken out of application amounts. The sell spread is taken out of withdrawal amounts. |
| ***Withdrawal fee*** **The fee on each amount you take out of your investment.** | Nil | Not applicable |
| ***Exit fee*** **The fee to close your investment.** | Nil | Not applicable |
| ***Switching fee*** **The fee for changing investment options.** | Nil | Not applicable |

i. Management fees and costs are expressed as a percentage of each Investment Option's net assets. Management fees and costs are made up of a management fee, recoverable expenses and estimated other indirect costs. The sum of these figures may differ to the total management costs, due to rounding. For more information about management fees and costs, see 'Management fees' and 'Indirect costs' under the heading 'Additional explanation of fees and costs' in the Original PDS.

ii. The management fee may be negotiated with investors who are wholesale clients for the purposes of the Corporations Act. See 'Differential fees' under the heading 'Additional explanation of fees and costs' in the Original PDS.

iii. For more information on the meaning and calculation of indirect costs, see 'Indirect costs' under the heading 'Additional explanation of fees and costs' in the Original PDS.

iv. For more information on the meaning of interposed vehicles, see 'Indirect costs' under the heading 'Additional explanation of fees and costs' in the Original PDS.

v The estimated performance fee is based on the average of the actual performance fees charged (including by interposed vehicles) for this unit class over the previous five financial years. This estimate is inclusive of Goods and Services Tax (GST) less reduced input tax credits. It is provided as an estimate only and is not a forecast. The actual performance fee from time to time may be higher, lower or not payable at all. For more information, see 'Performance fees' under the heading 'Additional explanation of fees and costs' in the Original PDS.

vi. For more information about transaction costs and buy/sell spreads that may apply, see 'Transaction costs' under the heading 'Additional explanation of fees and costs' in the Original PDS.

*The Original PDS is otherwise unchanged. The information contained in this SPDS is general only and does not take into account any investor's personal objectives, financial situation or needs. All investors should read the SPDS carefully (together with the Original PDS) and should obtain financial advice that is tailored to their circumstances. In addition, all investors should also review the Target Market Determination (TMD) for a fund before making an investment decision to consider whether the fund is appropriate for them. A TMD in respect of a fund is available at* **amp.com.au/investments-tmd.**

# Contact us

### Registered offices

ipac Asset Management Limited
Level 29, 50 Bridge Street
SYDNEY NSW 2000

National Mutual Funds Management Ltd
Level 29, 50 Bridge Street
SYDNEY NSW 2000

### Mailing address of the Investment Options

National Mutual Funds Management Ltd - Unit Registry
GPO Box 804
MELBOURNE VIC 3001

### Client services

Phone 133 267
Monday to Friday, 8.30am - 5.30pm (Sydney time)
Email **ampinvestments@amp.com.au**

| Investment Option | Registered name of the Investment Option | ARSN | APIR code | Unit class |
|---|---|---|---|---|
| MyNorth Guardian Max 60 | North Managed Volatility Moderately Defensive Fund | 163 411 461 | IPA0169AU | K |
| MyNorth Guardian Max 85 | North Managed Volatility Balanced Fund | 163 411 318 | IPA0167AU | K |
| MyNorth Guardian Max 100 | North Managed Volatility Growth Fund | 163 411 274 | IPA0168AU | K |

Collectively in the Product Disclosure Statement (PDS), the above-named funds are referred to as the 'MyNorth Guardian Funds' or 'the Funds' or 'the Investment Options'.

## Important information

ipac Asset Management Limited (ABN 22 003 257 225, AFSL 234655), is the Responsible Entity of the MyNorth Guardian Funds and issuer of this Product Disclosure Statement (PDS).

The Funds are managed investment schemes structured as unit trusts and registered under the *Corporations Act 2001* (Cth), referred to in this PDS as the 'Corporations Act'. Each of the MyNorth Guardian Funds has a different investment objective and is referred to in this PDS as an 'Investment Option' or a 'MyNorth Guardian Investment Option'.

The Responsible Entity has appointed National Mutual Funds Management Ltd (ABN 32 006 787 720, AFSL 234652) ('NMFM' or 'the investment manager') as the investment manager of the Investment Options. The Responsible Entity has also appointed NMFM under an agreement to provide other fund related services, including the preparation of this PDS. No company in the AMP Group other than the Responsible Entity is responsible for the preparation and issue of this PDS or for any statements or representations made in this PDS.

The Responsible Entity and NMFM are members of the AMP Group. NMFM has provided consent to the statements about them in this PDS and has not withdrawn that consent prior to the issue of this PDS.

An investment in the Investment Options is subject to investment risk, including possible delays in repayment and loss of income and capital invested. The Responsible Entity, AMP Limited and associated companies, and any investment manager do not assume any liability to investors in connection with investment in the Investment Options or guarantee the repayment of capital, payment of income, or the performance of the Investment Options or a particular rate of return. Investments in the Investment Options are not deposits or liabilities of any company in the AMP Group or of any investment manager. The obligations of the Responsible Entity are not guaranteed by AMP Limited or any associated companies or any investment manager.

The offer made in this PDS is only available to investors receiving it (electronically or otherwise), signing it and submitting it in Australia. The Responsible Entity reserves the right to change the terms and conditions of the PDS. If the change is an increase in fees then notice will be provided 30 days before the change takes effect. Otherwise notice of a material change will be provided before or as soon as practicable after the change occurs.

Unless otherwise specified, all dollar amounts in this PDS are Australian dollars.

## About this Product Disclosure Statement (PDS)

This PDS contains important information about investing in the Investment Options and may be used by platform operators, to apply for units in the Investment Options. The platform operators can give this PDS to their customers (indirect investors) to provide them with information about the Investment Options to assist them in making a decision about instructing their platform operator to invest in the Investment Options on their behalf. Platform operators are the unit holder in the Investment Options; their rights differ from the rights of indirect investors, who are not unit holders (see the 'Other important information' section of this PDS).

Before making a decision about investing or reinvesting in the Investment Options, all investors should carefully consider the information in the PDS. A copy of the current PDS can be obtained free of charge, on request by contacting us on 133 267. In addition, indirect investors should also review the Target Market Determination (TMD) for an Investment Option before making an investment decision to consider whether the Investment Option is appropriate for them. A TMD in respect of an Investment Option is available at **amp.com.au/investments-tmd**. Information in this PDS can help investors compare the Investment Options to other funds they may be considering. The information in this PDS is general information only and does not take into account any investor's personal objectives, financial situation or needs. All investors should obtain financial advice that is tailored to their circumstances.

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# About ipac Asset Management Limited

ipac Asset Management Limited, a member of the AMP Group, is the Responsible Entity of the Investment Options and issuer of this PDS. The Responsible Entity is responsible for the overall operation of the Investment Options. No company in the AMP Group other than the Responsible Entity is responsible for the preparation and issue of this PDS or for any statements or representations made herein. The Responsible Entity can be contacted on 133 267.

NMFM has been appointed by the Responsible Entity as the investment manager of the Investment Options and, under an agreement, to provide other fund related services including responding to investor enquiries. NMFM is also a member of the AMP Group and can be contacted on 133 267.

## About NMFM

As the investment manager, NMFM is responsible for managing and investing the Investment Options' assets and seeking to achieve their investment objectives. This includes determining the mix of asset classes, managing market exposures and researching and appointing specialist investment managers who conduct investment activities on behalf of the Investment Options.

## Throughout this PDS

| References to: | To be read as: |
|---|---|
| 'investor', 'unitholder' or 'you' | A client invested in any of the Investment Options, including any person authorised to act on their behalf |
| 'financial adviser' | A financial adviser holding an Australian Financial Services Licence or acting as a representative or an authorised representative of a licensee |
| 'ipac' or 'Responsible Entity' | ipac Asset Management Limited |
| 'NMFM', 'AMP Investments', 'the investment manager', 'we', 'our' or 'us' | National Mutual Funds Management Ltd |
| 'ASIC' | Australian Securities and Investments Commission |
| 'Business Day' | Any day other than Saturday, Sunday or a bank or public holiday in Sydney, NSW |
| 'indirect investor' | A client investing via a master trust or wrap account |
| 'platform operator' | A trust, wrap account, investor directed portfolio service, nominee or custody service, platform or the operators of these investment vehicles, as applicable |

# About the MyNorth Guardian Investment Options and the benefits of investing

The MyNorth Guardian Investment Options are a series of diversified funds that provide exposure to a mix of Australian and international shares, Australian and international fixed interest, and cash. There are three Investment Options—MyNorth Guardian Max 60, MyNorth Guardian Max 85 and MyNorth Guardian Max 100. Exposures may be achieved by holding the assets directly, indirectly through investments in other managed investment schemes (including index funds), or synthetically through derivatives.

The aim of each Investment Option is to provide a rate of investment growth over the medium to long term that is similar to that of a comparable traditional diversified fund, while managing the level of short-term fluctuations across different market conditions.

This is achieved by increasing or decreasing each Investment Option's exposure to shares (within specified ranges) based on estimated short-term market volatility.

As a result, the allocation to shares within each of the Investment Options can change significantly over time in response to changes in share market volatility. The strategy aims to have a lower than normal allocation to shares when share market volatility is higher, and a higher than normal allocation to shares when share market volatility is lower.

It is important to note that this strategy will not limit the size of any decline in portfolio value nor does it provide any capital guarantee of your initial investment amount or the value of your portfolio.

## About investing in diversified funds

### Volatility

The term 'volatility' is used to describe the fluctuation in returns. It is common practice to estimate volatility by calculating the standard deviation of historical returns. The words 'risk', 'fluctuation' and 'volatility' are often used interchangeably.

### Asset allocation

Diversified funds invest in a variety of asset classes such as shares, fixed income and cash. As each asset class has different return and volatility expectations, the return and volatility profile of the investing diversified fund will be determined by the allocations to each asset class and the mix of these allocations over time. For example, diversified portfolios with large exposures to shares are described as more 'risky' than those with large exposures to fixed income or cash.

### Traditional diversified funds

Traditional diversified funds typically maintain relatively stable allocations to each asset class. As a result, the short-term volatility of a traditional diversified fund will tend to follow that of the assets in which it is predominantly invested. For example, when share prices are experiencing significant volatility, so too will traditional diversified funds with large exposures to shares.

## Investment risks

All investing involves risk, and you should consider investment risks before making an investment decision. The key risks of investing in the Investment Options include or are associated with:

- **asset allocation** – an investment option's asset allocation strategy does not guarantee positive investment performance at all stages of the investment cycle.
- **share market investments** – while listed equity investments have historically produced higher returns than cash or fixed interest over the long term, the risk of capital loss exists, especially over the shorter term.
- **international investments** – the value of offshore investments may be impacted by changes to global economic and market conditions, currency risk and jurisdictional risk.
- **credit** – the value of an asset can change due to changes in the credit quality of its issuer.
- **interest rates** – there is a risk of capital loss in a rising interest rate environment.
- **counterparty and default** – losses can be incurred if an issuer or counterparty defaults on interest payments, the repayment of capital or other financial or contractual obligations.
- **derivatives** – the use of derivatives may magnify any losses incurred.
- **climate** – refers to the financial risks arising from climate change including physical and transition risks.
- **investment management** – there is a risk that the investment manager will not perform to expectations.
- **liquidity** – assets subject to liquidity risk may be difficult to trade and it may take longer for their full value to be realised. In circumstances where an investment option's portfolio ceases to be 'liquid' for Corporations Act purposes, there may be significant delays or a freeze on withdrawal requests.
- **markets** – the value of an investment option's investments will rise and fall with the prices of the markets in which they are invested.
- **securities lending** – although engaging in securities lending and borrowing may provide increased returns, there is a risk of capital loss.

- **underlying funds** – where an Investment Option invests indirectly into assets through investments into other investment vehicles, that Investment Option is exposed to additional risks compared to a fund investing into those assets directly.
- **unforeseen extraordinary events** – events such as natural disasters or phenomena, changes in government or government policies, sovereign default, political unrest, war and terrorism may affect market and asset prices and give rise to increased or prolonged market volatility.

The 'Risks of investing' section of this PDS provides further information about the risks noted above and other investment risks of which you should be aware.

## Risk measure categories

The table below sets out standard risk measure bands/levels. These correspond to the estimated number of negative annual returns that an Investment Option may experience over any 20-year period. Information about the methodology used for calculating the risk level can be obtained by contacting us.

| Risk band | Risk level | Estimated number of negative annual returns over any 20-year period |
|---|---|---|
| **1** | Very low | Less than 0.5 |
| **2** | Low | 0.5 to less than 1 |
| **3** | Low to medium | 1 to less than 2 |
| **4** | Medium | 2 to less than 3 |
| **5** | Medium to high | 3 to less than 4 |
| **6** | High | 4 to less than 6 |
| **7** | Very high | 6 or greater |

## Asset class descriptions

The descriptions below provide a general overview of key asset classes and their typical role in an investment portfolio. Each asset class has different risks and return characteristics.

**Cash** – cash investments refer to funds held in bank accounts, short-term deposits, or money market instruments. These assets are highly liquid and generally offer low risk, making them suitable for investors seeking capital preservation and immediate access to their funds. While returns are typically modest, cash can play an important role in balancing portfolios and providing stability during volatile market periods.

**Fixed income** – fixed income assets primarily consist of bonds and other debt securities issued by governments, corporations, or other entities. Investors receive regular interest payments and return of principal at maturity, making fixed income an attractive option for those seeking predictable income streams and lower risk than shares. Australian government bonds, corporate bonds, and floating rate notes are common examples. The value of these assets may fluctuate with changes in interest rates and credit risk.

**Australian shares** – Australian shares represent ownership in companies listed on the Australian Securities Exchange (ASX) and may include shares listed in New Zealand. Investing in shares provides opportunities for capital growth and dividend income but also comes with higher risk due to market volatility. Australian shares can offer exposure to sectors such as mining, banking, healthcare, and retail. Over the long term, shares have historically delivered strong returns, although their value can rise or fall sharply in the short term.

**Global shares** – global shares invest predominantly in developed markets outside Australia, providing exposure to companies listed on international stock exchanges such as those in the US, Europe and Asia. Investing in global shares can help diversify portfolios by providing access to overseas companies, sectors and economies that may not be available through the Australian market. These investments are subject to currency risk and overseas market fluctuations but can help spread risk across a broader range of developed international markets.

**Property** – property investments include both direct assets (such as office buildings, shopping centres and industrial estates) and indirect investments through unlisted property funds or listed property securities (commonly known as REITs). Direct and unlisted property investments are generally illiquid, whereas listed property securities are traded on public markets and are therefore more liquid. These assets often benefit from rental income and the potential for long-term capital growth. Property may also provide diversification benefits to a multi-asset portfolio and some degree of inflation protection. Key risks include property market downturns, tenant and leasing risks, development and construction risks, and sensitivity to interest rate movements.

**Infrastructure** – infrastructure investments include both direct assets (such as airports, toll roads, ports, utilities, energy infrastructure, communications infrastructure and social infrastructure) and indirect investments through unlisted infrastructure funds or listed infrastructure securities. Direct and unlisted infrastructure investments are generally illiquid, whereas listed infrastructure securities are traded on public markets and are therefore more liquid. These assets often benefit from stable cash flows, long asset lives and the potential for long-term capital growth. Infrastructure may also provide diversification benefits to a multi-asset portfolio and some degree of inflation protection. Key risks include regulatory and policy changes, operational and asset-specific risks, project execution risks, and sensitivity to interest rate movements.

**Alternatives** – alternatives encompass a broad range of assets outside traditional categories, including hedge funds, commodities, digital assets, and absolute return strategies. These investments aim to provide diversification, reduce portfolio volatility, and potentially enhance returns, often through different risk profiles and return drivers.

## Further information

For platform operators, if you have questions about investing in the Investment Options or require further information, please contact the Client Services team on 133 267. Indirect investors should contact their financial adviser or platform operator.

Further information about the Investment Options is also available online at **northonline.com.au**. This information may include performance reports.

When reading fund performance information, please note that past performance is not a reliable indicator of future performance and should not be relied on when making a decision about investing in an Investment Option.

## At a glance

| | MyNorth Guardian Max 60 | MyNorth Guardian Max 85 | MyNorth Guardian Max 100 |
|---|---|---|---|
| **Investment return objective** | To provide modest growth in your investment over the medium term while managing the level of short-term volatility, with some fluctuations in value likely. | To provide moderate growth in your investment over the medium term to long term while managing the level of short-term volatility, with moderate fluctuations in value likely. | To provide moderate to high growth in your investment over the long term while managing the level of short-term volatility, with moderate to high fluctuations in value likely. |
| **Risk level**(i) | High | High | High |
| **Risk band**(i) | 6 | 6 | 6 |
| **Suggested minimum investment timeframe** | 4 | 5 | 7 |
| **Who can invest?** | **Platform operators** - investing directly into an Investment Option<br>**Indirect investors** - investing in the Investment Options through a master trust or platform | | |
| **Minimum investment amounts**(ii) | **Platform operators**<br>Initial – $10,000,000<br>Additional – $5,000<br>**Indirect investors**<br>Minimum investment amounts are subject to the arrangements between indirect investors and their platform operators. | | |
| **Management fees and costs** | **Platform operators** | | |
| | Max 60 | Max 85 | Max 100 |
| | 0.82% pa | 0.62% pa | 0.63% pa |
| | **Indirect investors**<br>Fees and costs are subject to the arrangements between indirect investors and their platform operators. | | |
| | **See the 'Fees and other costs' section of this PDS for details of the ongoing annual fees and costs, including management fees and costs, performance fees (if applicable) and transaction costs components, other fees and costs that may apply, and a worked example of ongoing annual fees and costs that may be payable in a year. The total amount of fees you will pay will vary depending on the total value of your investment.** | | |
| **Distribution frequency** | The Investment Options aim to pay distributions annually (see the 'Distributions' section of this PDS). | | |

(i) The risk band and risk level are based on an estimation of the expected number of negative annual returns over any 20-year period (as outlined in the Risk measure categories table on page 5). This is not a complete description of the risks of investing in the Investment Option. Consequently, before choosing to invest or reinvest in the Investment Option, you should read this PDS, and consider factors such as the likely investment return, the risk of investing and your investment timeframe.

(ii) The Responsible Entity reserves the right to vary these minimums.

## Investment approach

A key feature of the MyNorth Guardian Investment Options is how their asset allocation strategy responds to changes in short-term market volatility. Unlike traditional diversified funds, the MyNorth Guardian Investment Options are managed to targeted volatility levels.

During periods of rising market volatility, each MyNorth Guardian Investment Option will tend to decrease its allocation to shares and increase its allocation to cash. The aim of this strategy is to maintain the short-term volatility of each Investment Option's returns within a tighter range (than a comparable traditional diversified fund). During periods of falling market volatility, each Investment Option will tend to increase its allocation to shares and may decrease its allocation to cash. Allocations to shares and cash are bound by the strategic ranges shown on page 8.

The aim of this strategy is for the MyNorth Guardian Investment Options to deliver a more stable volatility experience than comparable traditional diversified funds over the short term. Over the medium to long term, the volatility experience of a MyNorth Guardian Investment Option is expected to be similar to that of a comparable traditional diversified fund.

In order to implement this volatility-targeting strategy, the Investment Options need the flexibility to make significant changes to the allocations to growth and defensive assets, ie shares and cash. This flexibility is provided by the allowable asset class ranges, as set out on page 8, which are considerably wider than for comparable traditional diversified funds. The Investment Options may implement asset allocation changes by either buying or selling the underlying assets, by using derivatives or a combination of these methods.

There are a number of risks to consider when investing in the MyNorth Guardian Investment Options. These include risks regarding volatility and return outcomes, implementation and market risks. See 'Risks of investing' for more information.

## Your investment in the Investment Options

The money from individual investors is pooled and invested according to the investment objective and asset allocation strategy for each Investment Option. You do not have direct ownership of the underlying assets held by the Investment Options. The offer of units made under this PDS is only available to clients accessing it through a master trust or wrap account. For more information about investing through a master trust or wrap account please see page 22.

| | MyNorth Guardian Max 60 | MyNorth Guardian Max 85 | MyNorth Guardian Max 100 |
|---|---|---|---|
| **Investment objective**[(i)] | To provide modest growth in your investment over the medium term while managing the level of short-term volatility, with some fluctuations in value likely. | To provide moderate growth in your investment over the medium term to long term while managing the level of short-term volatility, with moderate fluctuations in value likely. | To provide moderate to high growth in your investment over the long term while managing the level of short-term volatility, with moderate to high fluctuations in value likely. |
| **Investment strategy**[(i)] | To invest in a diversified mix of growth and defensive assets while adjusting the growth/defensive ratio based on estimated short-term volatility (as described in the 'About the MyNorth Guardian Investment Options section').<br>Investments within each asset class will be made on a passive basis. | To invest in a diversified mix of growth and defensive assets while adjusting the growth/defensive ratio based on estimated short-term volatility (as described in the 'About the MyNorth Guardian Investment Options section').<br>Investments within each asset class will be made on a passive basis. | To invest in a diversified mix of predominantly growth assets while adjusting the growth/defensive ratio based on estimated short-term volatility (as described in the 'About the MyNorth Guardian Investment Options section').<br>Investments within each asset class will be made on a passive basis. |
| **Asset allocations**[(ii)] | **Asset class** / **Strategic range %** | **Asset class** / **Strategic range %** | **Asset class** / **Strategic range %** |
| | Australian shares / Global shares: 8 - 60 | Australian shares / Global shares: 11 - 85 | Australian shares / Global shares: 14 - 100 |
| | Fixed income[(iii)]: 24 - 50 | Fixed income[(iii)]: 10 - 37 | Fixed income[(iii)]: 0 - 24 |
| | Cash[iv]: 0 - 68 | Cash[iv]: 0 - 79 | Cash[iv]: 0 - 86 |
| | **Growth: 30 - 70** | **Growth: 50 - 90** | **Growth: 65 - 100** |
| | **Defensive: 30 - 70** | **Defensive: 10 - 50** | **Defensive: 0 - 35** |

For up-to-date performance data please speak to your financial adviser or visit **northonline.com.au**

(i) We may change an Investment Option's investment objective or investment strategy from time to time, if we consider it to be in the best interests of investors. If we do so, we will advise investors.

(ii) Actual asset allocations will regularly change in response to short-term fluctuations in market volatility. We aim to manage asset allocations within the strategic ranges. However, in certain circumstances, actual allocations may fall outside of these ranges. Such circumstances may include but are not limited to where an Investment Option or underlying fund is closed for new applications or withdrawals, during changes to the product structure, asset allocation or manager line-up, or in certain market conditions. The Investment Options will not deviate outside the asset allocation ranges to pursue investment opportunities based on short-term expectations. If we change the strategic ranges, a PDS update notice will be lodged online at **amp.com.au/investments-pds**.

(iii) Fixed income may include government bonds and credit (investment grade).

(iv) The cash allocation includes short-term, high-quality money market and corporate securities which aim to improve the tracking efficiency of index portfolios.

## Further information about the Investment Options

### Borrowing

It is not our intention to gear the Investment Options, but they may borrow to meet their short term liquidity needs.

An Investment Option may incur costs through interest expenses and the establishment and maintenance of a borrowing facility.

### Derivatives

The Investment Options and/or the underlying managers may use derivatives such as options, futures, swaps and foreign exchange forward contracts with the aim of:

- increasing or reducing exposure to markets, relative to the underlying physical holdings and subject to each Investment Option's investment guidelines
- protecting against risks such as unfavourable changes in an investment's price brought about by, for example, changes in interest rates, credit risk, equity prices, currencies or other factors,
- enhancing returns by taking advantage of favourable mispricings within a market, as a cost-effective alternative to purchasing physical assets, and
- implementing each Investment Option's investment objectives.

There is risk of loss through the use of derivatives, including:

- the value of a derivative may not move in line with that of its underlying asset
- derivative exposures may be difficult or costly to reverse, particularly in periods of market volatility or reduced liquidity
- leverage in derivatives may magnify losses
- the counterparty to a derivative contract may default on financial or contractual obligations.
- in periods of market volatility, losses on derivative positions - particularly foreign exchange (FX) exposures - may require an Investment Option to hold additional cash or to sell assets, sometimes at unfavourable prices, in order to meet funding requirements

We impose restrictions on the use of derivatives within the Investment Options and monitor the implementation of these restrictions in accordance with the Derivatives Risk Statement, which can be obtained, free of charge, by contacting us.

### Currency management

Each Investment Option has a targeted exposure to foreign currency through its international holdings. We maintain a currency hedging strategy around this exposure.

### Labour standards and Environmental, Social and Governance (ESG) considerations

An Investment Option's key investment decisions are based primarily on financial and economic factors, including investment style and approach. Some consideration is given to labour standards and ESG factors.

Further details can be found in the 'Labour standards and ESG considerations' in the 'Other important information' section of this PDS.

# Risks of investing

## All investing involves risk

Generally, the higher the expected return, the higher the risk.

Assets with the highest long term returns may also carry the highest level of short term risk, particularly if you do not hold your investment for the suggested minimum investment timeframe. Each investment option will carry a different level of risk depending on the assets in which it invests.

In managing the investment options we seek to achieve their investment objective, deliver competitive investment returns and protect against risk. However, when investing you should be aware that:

- returns are not guaranteed – they may vary and future returns may differ from past returns
- distributions are not guaranteed – they may vary and future distributions may differ from past distributions, and
- the value of your investment may vary, and there may be the risk of loss or delay in repayment of invested capital.

Investment risks can affect your financial circumstances in a number of ways including:

- your investment in an investment option may not keep pace with inflation, which would reduce the future purchasing power of your money
- the stated objectives of an investment option may not be met
- distributions might not be paid or the amount of any distribution you receive from an investment option may vary or be irregular, which could have an adverse impact if you depend on regular and consistent distributions to meet your financial commitments, and
- your investment in an investment option may decrease in value, which may mean you get back less than you invested.

The value of your investment in an investment option may be affected by the risks listed in this section and by other risks or external factors such as economic conditions, government policy, taxation and other laws.

Other factors such as your age, the length of time you intend to hold your investment, other investments you may own, and your personal risk tolerance will affect your risk profile as an investor. As the risks noted in this section do not take into account your personal circumstances, you should consider the information provided in 'Making an investment decision' at the end of this section, before making a decision about investing or reinvesting in an investment option.

## Risks specific to the MyNorth Guardian Investment Options

There are specific risks relating to the Investment Options' volatility management strategy.

**Strategy risks**

– **volatility outcomes**: The assumptions regarding share market volatility may not be realised or share market volatility may not be able to be accurately estimated. As a result, an Investment Option may not meet its aim of delivering a more stable volatility experience than a comparable traditional diversified fund over the short term.

– **return outcomes**: Even if more consistent volatility is realised, an Investment Option may deliver long-term returns significantly different to those of a comparable traditional diversified fund.

**implementation risks**

The investment objective of each Investment Option is implemented via an asset allocation strategy that allows shifts in exposure between between shares and cash in response to changes in estimated market volatility.

The investment manager may implement this strategy:

- synthetically by using derivatives
- by buying and selling the relevant assets directly, or interests in vehicles that hold the relevant assets, or
- through a combination of the above.

The risks associated with the implementation of this strategy include:

- **timing**: If changes to asset allocations cannot be implemented in a timely manner, there is a risk that an Investment Option may not achieve its objective.
- **counterparty risk**: Entry into derivatives creates counterparty risk. Substantial losses may be incurred if a derivative counterparty fails to deliver on its contractual obligations.
- **counterparty replacement risk**: If the need to replace a counterparty arises, there is a risk that the objectives of the asset allocation strategy may not be met for a period of time.

Failure to manage these risks could result in an Investment Option not meeting its investment objectives.

The Responsible Entity has processes in place to monitor counterparty risks and seeks to mitigate the risk of exposure to derivative counterparties, including taking collateral. The Responsible Entity may also implement the asset allocation strategy via another method, as set out above.

## Other investment risks

Some or all of these risks may apply to each of the Investment Options.

**Asset allocation**

There is no guarantee that the asset allocation approach will provide positive investment performance at all stages of the investment cycle.

**Share market investments**

Share markets can be volatile, meaning they have the potential to rise and fall by large amounts over short time periods. Over the long term, share market investments have historically produced higher returns than cash or fixed interest investments, but there is always the risk of capital loss especially over the shorter term. The value of listed share market securities may fall in response to broad dynamics, such as a slowdown in economic growth, or due to factors specific to individual sectors or companies, such as disappointing profits or management changes.

**International investments**

Changes in global economic and market conditions may affect the value of offshore investments. International investments may also be subject to:

- **currency risk** – where investments are located overseas, the relative strength or weakness of the Australian dollar against other currencies may influence the value of, or income from, an investment.
- **currency hedging** – international investments may be hedged to the Australian dollar to protect against currency risk. Even where currency hedging is in place, an investment option could still incur losses related to exchange rate movements, and the hedging itself may give rise to risks such as illiquidity or default by the other party to the hedging transaction.
- **offshore jurisdictional risk** – the laws by which offshore assets are governed may not provide equivalent protection to that of Australian laws and it may be more difficult for an investment option to recover the full value of offshore assets.

**Credit**

Credit risk is the risk that a security issuer may default on interest payments, the repayment of capital, or both. Fixed income securities are subject to credit risk. Asset values may be impacted by changes in the credit quality or credit rating of a security issuer as well as changes in the value of other similar securities. Investments in fixed income securities with a non-investment grade credit rating (that is, Standard & Poor's BB+ rating or equivalent, or lower) carry higher default risk.

**Interest rates**

Cash and fixed income investments are impacted by interest rate movements. While capital gains may be earned from fixed income investments in a falling interest rate environment, capital losses can occur in a rising interest rate environment. Interest rate risk is typically greater as the term to maturity of the investment increases.

**Counterparty and default**

A counterparty is another party in a financial transaction. Counterparties can include the issuers of securities in which an investment option invests and participants in financial transactions into which an investment option enters. Losses can be incurred if a counterparty fails to honour its financial or contractual obligations. Asset values may be impacted by changes in the credit quality or credit rating of a counterparty. Investments in derivatives, fixed income and credit are subject to counterparty and default risk.

**Derivatives**

There is risk of loss through the use of derivatives, including:

- the value of a derivative may not move in line with that of its underlying asset
- derivative exposures may be difficult or costly to reverse, particularly in periods of market volatility or reduced liquidity
- leverage in derivatives may magnify losses
- the counterparty to a derivative contract may default on financial or contractual obligations.

**Climate**

Climate-related risks may carry financial implications for an entity. These can be categorised as follows:

- **climate-related physical risks** - can be event-driven (acute physical risk) or arise from longer-term shifts in climatic patterns (chronic physical risk). Acute physical risks arise from weather-related events, such as storms, floods, drought or heatwaves. Chronic physical risks can include changes in precipitation and temperature which have been shown to adversely impact sea levels, water availability, biodiversity and soil productivity. Climate-related physical risks may carry financial implications for an entity such as the cost of direct damage to assets or indirect effects of supply-chain disruption.
- **climate-related transition risks** - are those arising from efforts to transition to a lower carbon economy. Transition risks include policy, legal, technological, market and reputation risks. These may carry financial implications for an entity such as increased operating costs or asset impairment. An entity's financial performance could also be affected by shifting consumer demands and the development and deployment of new technology.

**Investment management**

There is a risk that the investment manager, or underlying managers in which an investment option invests, does not perform to expectations. Changes, such as to the choice of underlying manager or within investment teams, may affect investment option performance.

**Liquidity**

Liquidity refers to the ease with which an asset can be traded (bought and sold). Assets that carry liquidity risk may be more difficult to buy or sell and it may take longer for their full value to be realised. Market conditions may adversely impact asset liquidity and may impact our ability to meet withdrawal requests within the periods specified under the 'Payment times' section of this PDS.

**Markets**

The value of investment will rise and fall with the prices of the markets in which they are invested. All investments carry market risk, though this will vary depending on asset type and time period. Market risk may be influenced by factors specific to a market, such as market sentiment, economic factors, such as inflation and interest rates, and other events. The past returns from, or volatility of, a market or asset class are not always reliable indicators of future performance or risk.

**Securities lending**

An investment option, and underlying funds or entities in which it invests, may engage in securities lending and borrowing, which involves transfer of title of eligible securities and other assets. While this may benefit an investment option in the form of increased returns, there is a risk of capital loss.

**Underlying funds**

Investing indirectly into assets through underlying funds exposes the investor to additional risks compared to investing directly into those assets. Investors are exposed to the investment strategies of the managers of the underlying funds. An investment option's performance and liquidity may be adversely affected by issues that adversely affect the underlying fund but that do not adversely affect the assets that the underlying fund invests in, such as counterparties to the underlying fund defaulting on their contractual obligations.

**Unforeseen extraordinary events**

Certain events beyond our reasonable control such as natural disasters or phenomena, changes in government or government policies, sovereign default, political unrest, war and terrorism may affect market and asset prices and give rise to increased or prolonged market volatility. It may not be possible to insure assets against some of these events and their duration and potential impact may not be foreseeable.

## Other risks

Other risks of investing may apply and you should seek appropriate advice before investing.

## Making an investment decision

As the risks noted in this PDS do not take into account your personal circumstances, you should consider the following before making a decision about investing or reinvesting in the Investment Options:

- **obtain professional advice** to determine if the relevant Investment Option suits your investment objectives, financial situation and particular needs.
- **ensure** you have read the most up-to-date **MyNorth Guardian Investment Options** PDS.
- **consider** the suggested minimum investment timeframe for the relevant Investment Option, as set out in this PDS.
- **regularly review** your investments in light of your investment objectives, financial situation and particular needs.

# Fees and other costs

**Did you know?**

Small differences in both investment performance and fees and costs can have a substantial impact on your long-term returns. For example, total annual fees and costs of 2% of your investment balance rather than 1% could reduce your final return by up to 20% over a 30-year period (for example, reduce it from $100,000 to $80,000).

You should consider whether features such as superior investment performance or the provision of better member services justify higher fees and costs. You may be able to negotiate to pay lower fees. Ask the fund or your financial adviser.

**To find out more**

If you would like to find out more, or see the impact of fees based on your own circumstances, the **Australian Securities and Investments Commission (ASIC) Moneysmart** website (**www.moneysmart.gov.au**) has a managed funds fee calculator to help you check out different fee options.

This section shows fees and other costs that you may be charged. These fees and costs may be deducted from your money, from the returns on your investment or from the assets of the managed investment scheme as a whole.

Taxes are set out in the 'Taxation' section of this document.

You should read all the information about fees and costs because it is important to understand their impact on your investment.

Unless otherwise specified, all dollar amounts are Australian dollars.

## Table 1

### MyNorth Guardian Investment Options

| Type of fee or cost | Amount | How and when paid |
|---|---|---|
| **Ongoing annual fees and costs** | | |
| ***Management fees and costs***[i] **The fees and costs for managing your investment.** | Management fees and costs range between 0.62% and 0.82% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 for details). | Management fees and costs are comprised of:<br>– a **management fee**[ii] - calculated daily and paid monthly out of the Investment Option's assets and reflected in the unit price.<br>– **indirect costs**[iii] - calculated on the basis of the Responsible Entity's reasonable estimate of such costs and paid out of the Investment Option's assets or interposed vehicle's[iv] assets once the cost is incurred and reflected in the unit price. |
| ***Performance fees***[v] **Amounts deducted from your investment in relation to the performance of the product.** | Estimated performance fees are 0.00% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 for details). | Paid out of the Investment Option's assets or interposed vehicle's assets when the costs are incurred and reflected in the unit price. |
| ***Transaction costs***[vi] **The costs incurred by the scheme when buying and selling assets.** | Estimated transaction costs range between 0.27% and 0.36% pa of the Investment Option's net assets, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 for details). | Paid out of the Investment Option's assets when the costs are incurred and reflected in the unit price. The amount shown is net of any transaction costs recovered from investors via buy-sell spreads (see below). |
| **Member activity related fees and costs (fees for services or when your money moves in or out of the scheme)** | | |
| ***Establishment fee*** **The fee to open your investment.** | Nil | Not applicable |
| ***Contribution fee*** **The fee on each amount contributed to your investment.** | Nil | Not applicable |
| ***Buy/sell spread***[vi] **An amount deducted from your investment representing costs incurred in transactions by the scheme.** | Buy/sell spread ranges from 0.05% and 0.05%, depending on the Investment Option (see the 'Ongoing annual fees and costs and buy/sell spreads' table on page 16 for details). | When you invest in or withdraw from an Investment Option, you may incur buy/sell spreads applicable at that time and this amount is reflected in the unit prices for that Investment Option. The buy spread is taken out of application amounts. The sell spread is taken out of withdrawal amounts. |
| ***Withdrawal fee*** **The fee on each amount you take out of your investment.** | Nil | Not applicable |
| ***Exit fee*** **The fee to close your investment.** | Nil | Not applicable |
| ***Switching fee*** **The fee for changing investment options.** | Nil | Not applicable |

(i) Management fees and costs are expressed as a percentage of each Investment Option's net assets. Management fees and costs are made up of a management fee, recoverable expenses and estimated other indirect costs. The sum of these figures may differ to the total management costs, due to rounding. For more information about management fees and costs, see 'Management fees' and 'Indirect costs' under the heading 'Additional explanation of fees and costs'.

(ii) The management fee may be negotiated with investors who are wholesale clients for the purposes of the Corporations Act. See 'Differential fees' under the heading 'Additional explanation of fees and costs'.

(iii) For more information on the meaning and calculation of indirect costs, see 'Indirect costs' under the heading 'Additional explanation of fees and costs'.

(iv) For more information on the meaning of interposed vehicles, see 'Indirect costs' under the heading 'Additional explanation of fees and costs'.

(v) The estimated performance fee is based on the average of the actual performance fees charged (including by interposed vehicles) for this unit class over the previous five financial years. It is provided as an estimate only and is not a forecast. The actual performance fee from time to time may be higher, lower or not payable at all. For more information, see 'Performance fees' under the heading 'Additional explanation of fees and costs'.

(vi) For more information about transaction costs and buy/sell spreads that may apply, see 'Transaction costs' under the heading 'Additional explanation of fees and costs'

## Fee amounts in this PDS

Fee amounts shown in this PDS are the fees the Responsible Entity charges platform operators investing through this PDS. If you are an indirect investor, please contact your financial adviser or platform operator for details of the fee amounts relating to your investment in the MyNorth Guardian Investment Options.

Fees may be payable to your financial adviser; these fees are additional to the fees noted in Table 1 (refer to the Statement of Advice provided by your adviser).

## Example of annual fees and costs

Table 2 gives an example of how the ongoing annual fees and costs in the MyNorth Guardian Max 85 Investment Option can affect your investment over a one-year period. You should use this table to compare this product with other managed investment products. The ongoing annual fees and costs shown in this table are an example only and are not additional to the fees and costs described in Table 1.

### Table 2

| Example – MyNorth Guardian Max 85 Investment Option | | Balance of $10,000,000 with a contribution of $5,000 during the year |
|---|---|---|
| **Contribution fees** | Nil | For every additional $5,000 you put in, you will be charged $0. |
| **Plus Management fees and costs**[(i)] | 0.62% pa of the Investment Option's net assets | **And**, for every $10,000,000 you have in the Investment Option you will be charged $62,000[(ii)] each year. |
| **Plus Performance fees** | 0.00% pa of the Investment Option's net assets | **And**, you will be charged $0[(ii)] in performance fees each year. |
| **Plus Transaction costs** | 0.27% pa of the Investment Option's net assets | **And**, you will be charged $27,000[(ii)] in transaction costs. |
| **Equals Cost of the Investment Option**[(iii)] | | If you had an investment of $10,000,000 at the beginning of the year and you put in an additional $5,000 during that year, you would be charged a fee of:<br><br>**$89,000**[(iii)]<br><br>**What it costs you will depend on the fund you choose and the fees you negotiate.** |

(i) Management fees and costs are expressed as a percentage of the MyNorth Guardian Max 85 Investment Option's net assets. Management fee and costs are made up of a management fee of 0.59% pa, recoverable expenses of 0.02% pa and estimated other indirect costs of 0.01% pa. The sum of these figures may differ to the total management fees and costs, due to rounding.

(ii) These fees and costs do not include the management fees and costs, performance fees and transactions costs charged on the additional $5,000 investment.

(iii) This cost does not include any advice fees paid to your financial adviser (see 'Payments to your financial adviser' in this section).

## Cost of product for 1 year

The cost of product gives a summary calculation about how ongoing annual fees and costs can affect your investment over a 1-year period for all other investment options. It is calculated in the manner shown in the 'Example of annual fees and costs' (Table 2 above).

The cost of product assumes a balance of $10,000,000 at the beginning of the year with a contribution of $5,000 during the year. Additional fees such as an establishment fee or an exit fee may apply: refer to the Fees and costs summary for the relevant option.

You should use this figure to help compare this product with other products offered by managed investment schemes.

| Investment Option | Cost of product[(iv)] |
|---|---|
| **MyNorth Guardian Max 60** | $118,000 |
| **MyNorth Guardian Max 100** | $92,000 |

(iv) These fees and costs do not include the management fees and costs, performance fees and transaction costs charged on the additional $5,000 investment.

## Additional explanation of fees and costs

### Ongoing annual fees and costs and buy/sell spreads

The ongoing annual fees and costs shown in Table 1 comprise the following components for each Investment Option:

- management fees
- indirect costs - recoverable expenses and estimated other indirect costs
- estimated performance fees
- transaction costs, and
- buy/sell spreads.

The sum of these figures may differ to the total management fees and costs, due to rounding. All figures in the table below are expressed as a percentage of the net assets of the Investment Options.

| Investment Option | Management fee[i] (% pa) | Indirect costs[i] (% pa) | | Estimated performance fees[ii] (% pa) | | Transaction costs (% pa) | Buy/sell spreads (%) |
|---|---|---|---|---|---|---|---|
| | | Recoverable expenses[iii] | Estimated other indirect costs | Performance fees charged to the Investment Option by underlying managers | Performance fees charged by interposed vehicles | | |
| **MyNorth Guardian Max 60** | 0.59 | 0.21 | 0.01 | 0.00 | 0.00 | 0.36 | 0.05/0.05 |
| **MyNorth Guardian Max 85** | 0.59 | 0.02 | 0.01 | 0.00 | 0.00 | 0.27 | 0.05/0.05 |
| **MyNorth Guardian Max 100** | 0.59 | 0.03 | 0.01 | 0.00 | 0.00 | 0.29 | 0.05/0.05 |

(i) Management fees and costs are expressed as a percentage of the relevant Investment Option's net assets, rounded to two decimal places. Management fees and costs are made up of a management fee and estimated indirect costs. Any management fees or indirect costs charged by interposed vehicles are included in the management fees and costs in Table 1 and the table above, they are not an additional cost to you.

(ii) The estimated performance fee is based on the average of the actual performance fees charged (including by interposed vehicles) for this unit class over the previous five financial years. It is provided as an estimate only and is not a forecast. The actual performance fee from time to time may be higher, lower or not payable at all. For more information, see 'Performance fees' under the heading 'Additional explanation of fees and costs'.

(iii) The recoverable expenses are the expenses reimbursed from the relevant Investment Option in the previous financial year. Past recoverable expenses reimbursed from the Investment Options may not be a reliable indicator of future recoverable expenses. See the 'Recoverable expenses' section for further information.

## Management fee

The management fee is charged by the Responsible Entity for managing and operating the Investment Options.

The management fee is charged on the value of the net assets of the Investment Options.

## Indirect costs

Indirect costs are generally any amount the Responsible Entity knows or estimates will reduce an Investment Option's returns, that are paid from an Investment Option's assets or the assets of interposed vehicles.

Generally, an interposed vehicle is a body, trust or partnership in which an Investment Option's assets are invested. It includes, for example, an underlying fund.

The amount of indirect costs include, but are not limited to:

- recoverable expenses of an Investment Option
- management fees and costs of an interposed vehicle (including recoverable expenses and any other indirect costs of underlying managers or interposed vehicles in which an Investment Option invests), and
- a reasonable estimate of the costs of investing in over-the-counter (OTC) derivatives (either at the Investment Option level or in interposed vehicles), which may be used by the Investment Options to gain economic exposure to assets (if applicable).

The amount of indirect costs shown in the 'Ongoing annual fees and costs and buy/sell spreads' table is based on the Responsible Entity's knowledge of, or where required, reasonable estimate of, such costs. Indirect costs are generally calculated on the basis of indirect costs paid by an Investment Option in that Investment Option's previous financial year. As such, the actual indirect costs may differ from the amount shown in the 'Ongoing annual fees and costs and buy/sell spreads' table. Indirect costs are deducted from the returns on your investment or from the relevant Investment Option's assets as a whole. They are reflected in the unit price and are not an additional cost to you. Estimated indirect costs are included in the management fees and costs in Table 1.

### Recoverable expenses

The Investment Options' constitutions entitle the Responsible Entity to be reimbursed from the Investment Options for any expenses incurred in relation to the proper performance of its duties.

These expenses include but are not limited to audit and legal fees, tax and accounting services, custody, administration and registry services, regulatory compliance, the cost of preparing disclosure documents and the costs associated with a securities lending program (if applicable). Internal expenses incurred in connection with these matters may also be recovered from the Investment Options'. Recoverable expenses are included in the management fees and costs in Table 1.

## Performance fees

The Investment Options are charged performance fees by **underlying** managers and interposed vehicles in which the Investment Options invest have charged performance fees, which are shown in the 'Ongoing annual fees and costs and buy/sell spreads' table.

An underlying manager may charge a performance fee of up to 25.65% of the **underlying** manager's outperformance of the portion of an Investment Option's assets they are managing may be charged, based on the underlying manager's outperformance above their relevant benchmark.

Investment managers receive performance fees if they meet specific investment performance targets, which means an investment manager may earn a performance fee irrespective of a particular Investment Option's overall performance.

**Underlying manager's performance fee example**

If you invested $10,000,000 in an Investment Option and 20% of that Investment Option's assets are managed by an underlying manager that has a performance fee and they outperform their performance benchmark index by 1% in a year, the indirect cost to you would be $5,130. This estimate is provided as an example only and is not a forecast. The actual performance fee may be higher, lower or not payable at all. This is dependent on factors which include the performance fee rate, underlying manager's outperformance and the percentage of assets managed.

## Updated fees and costs information

The fees and costs information are based on the Responsible Entity's actual knowledge, or reasonable estimate, of the particular fee or cost. Estimates may be based on a number of factors, including (where relevant), previous financial year information, information provided by third parties or as a result of making reasonable enquiries, and typical costs of the relevant investment. As such, the actual fees and costs may differ and are subject to change from time to time. Updated information that is not materially adverse to investors will be updated online at **amp.com.au/investments-pds**, or you may obtain a paper copy or an electronic copy of any updated information from us, free of charge, on request. However, if a change is considered materially adverse to investors, the Responsible Entity will issue a supplementary or replacement PDS, which will be available online. You can also obtain a copy of these documents, free of charge, by contacting us.

## Transaction costs

The Investment Options incur transaction costs when dealing with the assets of the Investment Options. Transaction costs may include transactional brokerage, clearing costs, stamp duty, the buy and sell spreads of any underlying fund and the costs of (or transaction costs associated with) derivatives. These costs will differ according to the type of assets in the Investment Options, or for the purpose for which any derivatives are acquired and will be paid out of the Investment Options' assets, when incurred.

We estimate the Investment Options' total gross transaction costs to be approximately:

| Investment Option | Transaction costs (as % of the net assets of the Investment Option) |
|---|---|
| **MyNorth Guardian Max 60** | 0.36% |
| **MyNorth Guardian Max 85** | 0.28% |
| **MyNorth Guardian Max 100** | 0.30% |

The transaction costs included in Table 1 are shown net of the buy-sell spreads incurred by investors.

### Buy and sell spreads

Transaction costs associated with dealing with the Investment Options' assets may be recovered by the Investment Options from investors.

Investments and withdrawals in the Investment Options may incur buy and sell spreads, which are designed to ensure, as far as practicable, that any transaction costs incurred as a result of an investor entering or leaving the Investment Options are borne by that investor, and not other investors.

Buy and sell spreads are calculated based on the actual or estimated costs the Investment Options may incur when buying or selling assets. They will be influenced by our experience of the costs involved in trading these assets in different market conditions or the costs that the Investment Options have actually paid, and will be reviewed whenever necessary to ensure they remain appropriate.

When you enter or leave the Investment Options, any buy or sell spread applicable at that time is a cost to you and is reflected in the unit price. The buy and sell spreads are retained within the Investment Options, as assets of the Investment Options; they are not fees paid to the Responsible Entity, NMFM or any investment manager.

The buy spread is taken out of application amounts. The sell spread is taken out of withdrawal amounts.

Based on the buy and sell spreads for the Max 85 Investment Option, an investment of $10,000,000 would incur a buy spread of $5,000, and a withdrawal of $10,000,000 would incur a sell spread of $5,000. This is an example only; it is not an estimate or forecast. The actual buy and/or sell spreads may be higher or lower.

Current buy and sell spreads can be obtained by contacting us, or can be obtained online at **amp.com.au/investments-spreads**.

If investments and withdrawals in an Investment Option incur buy and sell spreads, we estimate that the buy and sell spreads shown in the 'Ongoing annual fees and costs and buy/sell spreads' table will recover that Investment Option's transaction costs incurred due to investor activity. However, the balance of an Investment Option's transaction costs will be borne by that Investment Option from the Investment Option's assets without any recovery from individual investors and reflected in their unit prices.

The following table shows a breakdown of the total estimated transaction costs and how these are borne by investors.

| Investment Option | Total estimated transaction costs | Estimated transaction costs offset by buy/sell spreads | Estimated transaction costs borne by the Investment Option |
|---|---|---|---|
| **MyNorth Guardian Max 60** | 0.36% | 0.00% | 0.36% |
| **MyNorth Guardian Max 85** | 0.28% | 0.00% | 0.27% |
| **MyNorth Guardian Max 100** | 0.30% | 0.01% | 0.29% |

## Other costs

### Borrowing costs

Borrowing costs (or gearing costs) are the costs associated with borrowing money or securities (such as interest, establishment fees, government charges and stock borrowing fees). Borrowing costs are paid out of the Investment Option's assets or the underlying fund's assets (as the case may be) and reflected in the unit price. Borrowing costs are additional to the fees and costs noted in Table 1 above.

### Costs related to certain specific assets or activities to produce income

The Investment Options may also incur costs (related to certain specific assets or activities to produce income) that an investor would incur if they invested directly in a similar portfolio of assets. These costs will be paid out of the Investment Options' assets and are additional to the fees and costs noted in Table 1 above.

### Liabilities properly incurred

The Investment Options' constitutions entitle the Responsible Entity to be indemnified from the Investment Options for any liability properly incurred.

## Maximum fees

The maximum fees that can be charged under the Investment Options' constitutions (exclusive of GST) are:

- **entry fee**: 5% of the application amount. We currently do not charge an entry fee.
- **withdrawal fee**: 5% of the withdrawal amount. We currently do not charge a withdrawal fee.
- **management fee**: 3% pa of the value of the assets in an Investment Option. Current management fees are shown in the 'Ongoing annual fees and costs and buy/sell spreads' table.

Under the Investment Options' constitutions, the Responsible Entity is entitled to be paid an additional amount on the above fees, on account of GST, calculated in accordance with the Investment Options' constitutions.

## Changes to fees

The Responsible Entity may change the fees noted in this PDS at its discretion and without the consent of platform operators or indirect investors. For example, fees may be increased where increased charges are incurred due to changes to legislation, where increased costs are incurred, if there are significant changes to economic conditions, or if third parties impose or increase processing charges. However, we will give platform operators 30 days' written notice of any intention of the Responsible Entity to increase the existing fees it charges, or to charge new performance, contribution or withdrawal fees to an investment option.

## Goods and Services Tax (GST)

Unless otherwise stated, the fees and other costs shown in this section are inclusive of GST, less reduced input tax credits or other input tax credits claimable, rounded to two decimal places. For information about the tax implications of investing in the Investment Options, refer to the 'Taxation' section of this PDS.

## Differential fees

A rebate of part of the management fee or a lower management fee may be negotiated with investors who are wholesale clients for the purposes of the Corporations Act or with AMP Group staff. Further information can be obtained by contacting us.

## Alternative forms of remuneration

NMFM and the Responsible Entity may provide alternative forms of remuneration, such as professional development, sponsorship, and entertainment for financial advisers, dealer groups and master trust or investor directed portfolio service (IDPS) operators, where the law permits. Where such benefits are provided, they are payable by NMFM or the Responsible Entity and are not an additional cost to you. NMFM and the Responsible Entity maintain a register to record any material forms of alternative remuneration NMFM or the Responsible Entity may pay or receive.

## Payments to your financial adviser

Although we do not make any payments to financial advisers whose clients invest in the Investment Options through this PDS, your financial adviser may receive payments and/or other benefits from the dealer group or organisation under which they operate. These payments and benefits are not a cost to the Investment Options.

## Other payments

Payments may be made to entities such as dealer groups, platform operators, master trusts and investment administration services in relation to the Investment Options, where the law permits. These payments are not a cost to you.

The amount of these payments may change during the life of this PDS. For further information, please refer to the offer document issued by the relevant entity.

# Taxation

## Taxation treatment of your investment

It is important that you seek professional taxation advice before you invest or deal with your investment, as the taxation system is complex, and the taxation treatment of your investment will be specific to your circumstances and to the nature of your investment.

These comments are for information purposes and are intended for tax paying investors who hold their investment on capital account for income tax purposes and are based on our interpretation of Australian taxation laws and Australian Taxation Office administrative practices at the date of publication of this document.

The Investment Options are Managed Investment Trusts (MITs) and will be administered as Attribution Managed Investment Trusts (AMITs).

Under the AMIT tax regime, you are taxed on the taxable income that is attributed to you by the Responsible Entity on a fair and reasonable basis and in accordance with each Investment Option's constitution. You may be entitled to tax offsets, which reduce the tax payable by you, and concessional rates of tax may apply to certain forms of taxable income such as capital gains.

Australian resident individuals are liable to pay tax at their marginal rates on the taxable income attributed to them from each Investment Option. Generally, tax is not paid on behalf of investors. If you are not an Australian resident for income tax purposes, withholding tax may be payable on the taxable income of each Investment Option attributed to you at prescribed rates (even if not distributed in cash). Any withholding tax payable may be deducted from cash distributions or redemption proceeds.

Please note that at the time of your initial or additional investment there may be unrealised capital gains or accrued income in the investment options. If later realised, these capital gains and income may form part of the taxable income attributed to you. In addition, there may be realised but undistributed capital gains or income in the investment options, which may form part of the taxable income attributed to you.

Any losses generated by the Investment Options cannot be passed onto investors. However, where specific requirements are satisfied, that Investment Option should be eligible to offset losses to reduce later year income or capital gains.

You may also be liable to pay capital gains tax on any capital gains in respect of your investment, such as from disposing of your investment. You may instead realise a capital loss in respect of your investment, which may be used to reduce capital gains in the same or later years. For capital gains tax events on or after 1 July 2027, the 50% capital gains tax discount for individuals and trusts is replaced by cost-base indexation, and a minimum 30% tax may apply to certain capital gains (the 50% discount still applies to gains accrued before that date). This may affect the amount, components and character of capital gains attributed to you and shown on your AMMA Statement. Complying superannuation funds retain a one-third CGT discount. You should seek professional tax advice. The cost base of your investment, which is relevant when calculating any such capital gains or losses, may change over the duration of holding your investment. The cost base of your interest in the investment options may increase or decrease if the taxable income attributed to you differs to the amounts that you have received as a cash distribution.

Each year we will send you an AMIT Member Annual Statement (AMMA Statement), which will contain details of the taxable income attributed to you for the year, together with any net cost base adjustment amount by which the cost base of your interest in the Investment Options should be increased or decreased.

Taxation laws and administrative practices change from time to time. Such changes may impact the taxation of the investment options and you as an investor. It is your responsibility to consider and monitor the impact of any taxation reforms impacting your investment.

## Providing a Tax File Number (TFN)

Under law (Taxation Administration Act 1953 (Cth)) we can collect your TFN.

You do not have to provide a TFN, exemption code or Australian Business Number (ABN) when you complete an application to invest or reinvest in the Investment Options. However, if you do not provide any of these, the Responsible Entity is required to withhold an amount equal to the highest marginal tax rate (plus any applicable levies) multiplied by the amount of taxable income attributed to you (even if not distributed in cash). Any such amount may be deducted from cash distributions or redemption proceeds.

# Distributions

The Investment Options will normally distribute income annually, after the period ending 30 June.

You should be aware that although it is the intention that the Investment Options pay distributions annually, the amount of each distribution may vary or no distribution may be payable in a 12-month period.

Unit prices will normally fall after the end of each distribution period. Consequently, if you invest just before the end of a distribution period, some of your capital may be returned to you as income in the form of a distribution.

Any distributions you receive may affect the social security benefits to which you are or may be entitled, and you should consider discussing this with your financial adviser and Services Australia (Centrelink or the Department of Veterans' Affairs) (if applicable) before investing.

The distribution amount per unit holder will be calculated based on the number of units held at the end of the relevant distribution period.

Income distributions will normally be paid within 30 days of the end of the period and must be paid within three months of the end of the period.

## Payment of distributions

### Platform operators

You can choose to have distributions:

- paid directly into your current nominated account, or
- reinvested in the relevant Investment Option

by indicating your selection on your application form. If no selection is made, distributions will be reinvested.

### Indirect investors

Distributions are paid directly to platform operators. Payment of distributions to you is subject to the arrangement between you and the platform operator. Your financial adviser or platform operator can provide you with information about:

- how often distributions are paid, and
- the distribution payment method (eg paid directly into a nominated bank account or reinvested in the relevant Investment Option).

## Reinvestment

The issue price for reinvested distributions is determined by the net asset value (adjusted by any distribution payable) and any transaction costs, and the number of units on issue in the unit class as at the last day of the distribution period. No buy spread is applied to reinvested distributions (see 'Buy and sell spreads' in the 'Fees and other costs' section of this PDS).

# Investing in the MyNorth Guardian Investment Options

## Who can invest?

Applications to invest in the Investment Options through this PDS can only be made by platform operators, investing directly in the Investment Options.

If you are an indirect investor, the platform operator is investing on your behalf (see 'The constitution' on page 26).

Please note that we can only accept applications signed and submitted from within Australia. Further information is provided in the 'Applying for an investment' section of this PDS.

## How to invest

The offer to invest in the Investment Options is subject to the terms and conditions described in the PDS current at the time of contributing any investment amount. A current PDS can be obtained by contacting the Client Services team on 133 267.

### Platform operators

You will need to complete an application form when applying for an initial or additional investment in an Investment Option. An application form can be obtained by contacting the Client Services team on 133 267.

### Indirect investors

Your financial adviser or platform operator can provide you with a current PDS and information about how to apply, including the form you will need to complete, minimum initial and additional investment amounts, and the method of paying your investment amount.

## Terms and conditions of investing

The offer to invest in the Investment Options is subject to the terms and conditions described in the Investment Options' current PDS and as set out in the Investment Options' constitutions (see the 'Other important information' section of this PDS). The Responsible Entity reserves the right to change the terms and conditions (see below) and to refuse or reject an application.

We can only accept applications signed and submitted from within Australia. We cannot accept cash.

## Changes to the information in a PDS

Before making an investment decision, it is important to read a current PDS, as information provided in a PDS may change from time to time. If changes are not materially adverse to investors, the relevant information will be updated online at **amp.com.au/investments-pds**. However, if a change is considered materially adverse to investors, the Responsible Entity will issue a replacement or Supplementary PDS which will be available online. You can also obtain a copy of the replacement or Supplementary PDS free of charge, by contacting us.

## Processing applications

We generally process applications each Business Day, using the close of business issue price for that day.

Currently, the cut-off time is 1.00 pm, therefore if we receive an application properly completed together with cleared funds before 1.00 pm on a Business Day, we will process the application using the close of business issue price for that day. If we receive the application properly completed together with cleared funds after 1.00 pm or on a non-Business Day for us, we treat it as having been received before 1.00 pm the next Business Day. The application we receive must include the properly completed form including any required identification documentation as well as cleared funds.

## Issue price

The issue price is determined under each Investment Option's constitution by reference to the net asset value and transaction costs pertaining to the relevant class of units, and the number of units on issue in that unit class.

The market value and net asset value of the Investment Options are normally determined at least each Business Day, using the market prices and unit prices of the assets in which the relevant Investment Option is invested.

The Responsible Entity may exercise certain discretions in determining the unit price (see 'Unit Pricing Discretions Policy' in the 'Other important information' section of this PDS).

## Cooling off rights

### Platform operators

Cooling off rights do not apply in relation to an investment in the Investment Options.

### Indirect investors

Cooling off rights do not apply under this PDS. Your financial adviser or platform operator can provide you with the conditions, if any, that apply to returning your investment within the cooling off period set by the platform operator.

## The value of your investment

Investors in a managed scheme are issued with 'units', each of which represents a share of the value of the scheme's assets. Unit prices can rise and fall on a daily basis depending on a number of factors, including the market value of the relevant Investment Option's assets. Consequently, the value of your investment will vary from time to time.

### Platform operators

The value of your investment at any point in time is calculated by multiplying the number of units you hold, by the unit price relevant to the unit class current at that time.

Unit prices are updated regularly online at **amp.com.au/investments** and can also be obtained by contacting the Client Services team on 133 267.

### Indirect investors

When you invest through this PDS, the platform operator holds units on your behalf. The value of your investment at any point in time is calculated by multiplying the number of units held by you, by the unit price set by the platform operator. Your financial adviser or platform operator can provide you with the current unit price relevant to your investment in the Investment Options.

## Risk

The Investment Options are not capital guaranteed and the value of an investment in the Investment Options can rise and fall. You should consider the risks of investing before making a decision about investing in the Investment Options (see the 'Risks of investing' section of this PDS).

## Retaining this PDS

You should keep this PDS and any replacement or supplementary PDS, as you may need to refer to information about the Investment Options for ongoing investing. We will send you a current PDS and any replacement or supplementary PDS free of charge, on request.

## Questions about your investment

### Platform operators

Please contact the Client Services team on 133 267 if you have any questions relating to your investment.

### Indirect investors

You will need to contact your financial adviser or platform operator for information about your investment.

# Accessing your money

## Requesting a withdrawal

### Platform operators

Contact us in writing, telling us how much you wish to withdraw and giving your account details. Withdrawal requests can be submitted by email[1] at **ampi_transactions@unitregistry.com.au**, or by using approved electronic trading systems, or by mail to National Mutual Funds Management Ltd - Unit Registry, GPO Box 804, Melbourne VIC 3001. Withdrawal amounts will be paid to your nominated account.

A balance of $10,000,000 is generally required to keep your investment open. If your investment falls below this level, the Responsible Entity may redeem your investment and pay the proceeds to you. The Responsible Entity reserves the right, however, to accept lower account balances.

### Indirect investors

You will need to contact your financial adviser or platform operator for details about:

- how to withdraw money
- how your withdrawal will be paid, and
- the minimum withdrawal amount and account balance set by the platform operator.

## Processing withdrawal requests

Generally, if our office receives a withdrawal request before 1.00 pm on a Business Day, your withdrawal will be processed using the withdrawal price for that day. If received and accepted after 1.00 pm, it will be processed using the withdrawal price for the next Business Day. If it is a non-Business Day, your withdrawal will be processed using the next available withdrawal price.

The proceeds of your withdrawal request will usually be available within five (5) Business Days (see 'Payment times' in this section).

In circumstances where an Investment Option's portfolio consists of less than 80% in value of liquid assets, for example because of an unexpected fall in the value of those liquid assets against the value of the illiquid assets in an Investment Option's portfolio, we may not be able to meet withdrawal requests until an Investment Option's exposure to illiquid assets falls to 20% or less of its portfolio. We may, at our discretion, offer investors the opportunity to make withdrawals during this period. At such times, we will notify investors of the offer, providing details about:

- the period during which the offer will remain open, and
- which assets will be used to satisfy withdrawal requests.

We may also delay the payment and processing of your withdrawals in other circumstances (see 'Payment times').

## Withdrawal price

The withdrawal price is determined under each Investment Option's constitution by reference to the net asset value and transaction costs pertaining to the relevant class of units, and the number of units on issue in that unit class.

The market value and net asset value of the Investment Options are normally determined at least each Business Day, using the market prices and unit prices of the assets in which each Investment Option is invested.

The Responsible Entity may exercise certain discretions in determining the unit price (see 'Unit Pricing Discretions Policy' in the 'Other important information' section of this PDS).

## Payment times

Although we aim to process withdrawal requests within five (5) Business Days of receipt, you should be aware that:

- payment and processing of withdrawal requests is dependent on the relevant Investment Option's cash position, and
- each Investment Option's constitution allows up to 30 days, or longer in some circumstances, to process withdrawal requests.

These circumstances when a longer period is allowed and withdrawal requests may be suspended include, but are not limited to where the Responsible Entity is unable to realise sufficient assets due to circumstances beyond its control, such as restricted or suspended trading in the market for an asset.

## Transfer of units

### Platform operators

Please contact us for all transfer requests.

### Indirect investors

You will need to contact your financial adviser or platform operator for information about the transfer of units.

1 Please refer to 'Communicating electronically' in the 'Other important information' section of this PDS.

# Keeping you informed

We will provide platform operators with the information set out below. Platform operators are responsible for forwarding the relevant investment and Investment Option information to indirect investors.

## Investment information

Confirmation of each transaction will be made available to the platform operator through their online access.

## Online access

Online access allows platform operators to view investment information and statements. To register for online access, please contact us.

## Investment Option information

We will provide platform operators with the following information free of charge, on request:

- the Fund or Funds annual financial reports
- a paper copy of any updated information, and
- any replacement or supplementary PDS.

## Continuous disclosure obligations

Where an Investment Option has more than 100 unitholders it is subject to regular reporting and disclosure obligations under the Corporations Act. Copies of documents lodged with ASIC in relation to an Investment Option may be obtained from, or inspected at, an ASIC office or can be obtained free of charge by contacting us. These documents may include:

- each Investment Option's annual financial report most recently lodged with ASIC, or
- each Investment Option's half year financial report lodged with ASIC (after the lodgement of the annual financial report and before the date of the current PDS).

Where an Investment Option has continuous disclosure obligations, the Responsible Entity will meet those obligations by publishing material information online at **amp.com.au/investments**.

# Other important information

## The Responsible Entity

ipac is the Responsible Entity of the Investment Options. Its duties and obligations to unit holders are imposed, and its functions and powers are conferred on it by the constitutions (see below), the Corporations Act and general law. For example, in exercising its powers and carrying out its duties, the Responsible Entity must:

- act in the best interests of unit holders and treat unit holders of the same class equally and unit holders of different classes in an Investment Option fairly
- act honestly
- exercise the degree of care and diligence that a reasonable person would exercise if they were in the Responsible Entity's position, and
- if there is a conflict between unit holders' interests and its own interest, give priority to the unit holders' interests.

The Responsible Entity is authorised under the constitutions to appoint agents (such as the custodian) or engage the services of other persons (such as the operator of a securities clearing system) to undertake matters on its behalf. The Responsible Entity remains liable for the acts and omissions of any agent or person so appointed pursuant to the Corporations Act as though it had itself done (or failed to do) anything the agent or person has done (or failed to do).

## The constitution

Each Investment Option is a managed investment scheme registered under the Corporations Act. ipac is the Responsible Entity of each Investment Option. The constitution of each Investment Option establishes a framework for its operation and with this PDS, the Corporations Act and other relevant laws, and defines the relationship between ipac and unit holders.

The following description of each Investment Option's constitution is relevant primarily to master trusts or wrap accounts who are unit holders in the Investment Options. Indirect investors are not unit holders.

In summary, the constitutions include provisions dealing with:

- the Responsible Entity's investment and contracting powers on behalf of the Investment Options and valuation principles for assets
- the distribution of income and capital of the Investment Options
- the obligations, duties and powers of the Responsible Entity and delegation of its functions
- the voluntary and compulsory retirement, removal or replacement of the Responsible Entity
- the duration of the Investment Option, including termination by members or the Responsible Entity, or under operation of law
- recoverable expenses, permitted borrowing and the limiting of liability and remuneration and indemnification of the Responsible Entity
- the manner in which notices will be given, and payments made, to members
- procedures by which members may make complaints
- procedures for the convening and holding of meetings of members
- the maximum fees the Responsible Entity may charge, and
- amendment of the constitutions.

The Responsible Entity will provide, on request and free of charge, a copy of the constitutions (and any amendments that may be made from time to time). Please contact the Client Services team on 133 267 should you require a copy.

## Compliance plan

The Responsible Entity has a compliance plan for each Investment Option that it manages, which sets out the measures that will apply in operating the Investment Option to ensure compliance with the Corporations Act and each Investment Option's constitution. The compliance plan is lodged with the Australian Securities and Investments Commission (ASIC) and is audited by independent auditors annually to determine compliance with it. The Responsible Entity has the obligation to monitor compliance with the compliance plan and oversight of the effectiveness of the risk and compliance framework.

## Related party transactions

Any transaction between NMFM or the Responsible Entity and any of their respective related parties must comply with the Corporations Act, related party protocols and AMP Group policies and procedures. For these purposes, a related party includes certain entities and individuals that have a close relationship with NMFM or the Responsible Entity. Related parties of the Responsible Entity include the Responsible Entity itself, entities that the Responsible Entity controls, funds operated or managed by the Responsible Entity and agents of the Responsible Entity.

As at the date of this PDS, the relevant policies and procedures that apply to related party transactions of NMFM or the Responsible Entity are contained in the AMP Conflicts Management Policy. Under this Policy, the parties must transact on terms that would be reasonable if they were dealing at arm's length, relevant legislative requirements must be satisfied and the interests of investors must be protected. The Policy will be reviewed on a regular basis and may change from time to time. Further information on how we manage conflicts can be obtained by contacting us.

Under each Investment Option's constitution, the Responsible Entity may:

- deal with itself, an associate, investor or any other person
- be interested in and receive a benefit under any contract or transaction with itself, an associate, investor or any other person, or
- act in the same or similar capacity in relation to any other fund.

The Investment Options' constitutions also provide that amounts may be paid to related parties for services provided to NMFM or the Responsible Entity in connection with the Investment Options and for expenses. These payments are on arm's length terms.

## Complaints procedure

### Platform operators

NMFM and the Responsible Entity follow an established procedure to deal with complaints. Complaints are very important to us and we are committed to resolving them as quickly as possible. Depending on the type of complaint lodged, different timeframes apply for the resolution of the complaint. You can find out more information regarding timeframes on our website at **amp.com.au/support/complaints**.

If you have any concerns relating to your investment in the Investment Options, please contact us by email on **trustinfo@amp.com.au**, by telephone on 133 267 or in writing to National Mutual Funds Management Ltd, PO Box 6346, Wetherill Park NSW 1851.

If the complaint is privacy related, please refer to our Privacy Policy for more details, which can be obtained online at **amp.com.au/privacy**.

### Indirect investors

You should contact your financial adviser or platform operator if you have a complaint related to your investment in the Investment Options. If your issue remains unresolved, you can contact the external dispute resolution scheme of which the platform operator is a member.

## Your privacy

### Platform operators

The main purpose in collecting personal information is so that we can set up and administer your investment account. If you do not provide the required information, we may not be able to process your application. If you would like us to not use your personal information for direct marketing purposes, please contact us.

Our Privacy Policy, which can be obtained online at **amp.com.au/privacy** or by contacting us, sets out our policies on management of personal information. This information may be disclosed to other members of the AMP Group, financial advisers where applicable, to external service suppliers (including suppliers that may be located outside of Australia) who supply administrative, financial or other services that assist us in providing services to you, and to anyone you have authorised or if required by law.

You may access personal information held about you, although there are some exemptions to this. If you believe information held about you is inaccurate, incomplete or out of date, please contact us.

### Indirect investors

Your financial adviser or platform operator will collect personal information from you so that they can set up and administer your investment account. Your financial adviser or platform operator can provide you with information about how they use and disclose this information.

## Communicating electronically

When you communicate with us electronically (for example, by email), it is your responsibility to obtain confirmation from us that we have received your communication. Neither we nor the Responsible Entity are responsible for any loss or processing delay that occurs as a result of us not receiving your communication. Please note that we do not accept a sender's record as evidence that a communication has been received by us. You also indemnify us and the Responsible Entity against any loss or liability arising from us or the Responsible Entity acting on any fraudulent communication received by electronic means.

## Unit Pricing Discretions Policy

The Responsible Entity may exercise certain discretions in determining the unit price of units on application and withdrawal in an Investment Option. The Unit Pricing Discretions Policy, available online at **amp.com.au/investments** or free of charge by contacting us, explains the types of discretions the Responsible Entity may exercise, the circumstances the Responsible Entity exercises the discretions and why the policies are considered reasonable. The Responsible Entity is required to keep a record of any instance where a discretion is exercised in a way that departs from these policies.

## Asset Valuation Policy

The Investment Options invest by either holding assets directly or by investing into underlying funds. Generally, these assets or underlying funds will be valued each Business Day using latest available market prices or most recent unit prices supplied by the manager of the relevant underlying fund. For particular asset or fund types, including unlisted property and infrastructure, these may be valued less frequently e.g. quarterly. The Asset Valuation Policy sets out the processes for valuing these particular asset types. Further information on the Asset Valuation Policy can be obtained online at **amp.com.au/investments**, or free of charge, by contacting us.

## Labour standards and Environmental, Social and Governance (ESG) considerations

Factors informing our investment decisions are primarily financial and economic, including investment style and approach. AMP Investments acknowledges there are links between a company and its relationship with a wider set of stakeholders such as communities and environment, the quality of its corporate governance and its long-term financial success.

AMP Investments incorporates some consideration of ESG factors into an Investment Options' investment process, as more fully explained in the sections below.

**Selecting underlying managers**

AMP Investments selects and appoints underlying investment managers to invest the Investment Options' assets. An Investment Option's underlying investment managers are primarily responsible for selecting, retaining and realising investments in an Investment Option. The structure of the appointment of an underlying investment manager can be in either of the following ways:

- *directly held assets*: An Investment Option's assets are held directly under an investment mandate agreement with an underlying investment manager. In this instance, as Responsible Entity, we are able to influence the manager's ESG considerations.
- *indirectly held assets*: An Investment Option's assets are held indirectly via investment in an underlying investment manager's pooled fund. In this instance, the ESG policies of that manager's pooled fund will apply, and AMP Investments may or may not have influence over ESG considerations.

**The majority of the assets of the Investment Options offered through this PDS are directly held assets**.

The amount of directly and indirectly held assets may vary over time, depending on asset and manager allocation decisions, and market movements.

**Selecting, retaining and realising investments**

ESG considerations can be incorporated by the underlying investment manager into this process in two ways: via the aplication of restricted investments and active ownership and voting practices.

**1. AMP Investments Restricted investments list**

For directly held assets, which is the majority of each Investment Option's assets, the investment mandate agreement with the underlying investment manager includes the AMP Investments Restricted investments list. Investment in companies and issuers on this Restricted investments list are restricted. Investment is restricted because AMP Investments' process has identified companies or issuers based on the following business activities:

- verified involvement in cluster munitions, anti-personnel landmines, biological and chemical weapons (developing, marketing, sales, brokering, operating, stockpiling, testing, training, the upgrade of these types of weapons, and including key components that are specifically designed for these weapons).
- production of tobacco and nicotine based electronic cigarette products[1].
- a company earning more than 50% of its revenue from the sale or distribution of tobacco or nicotine based e-cigarettes to retailers and other distributors (as reported in audited financial statements or, if this information is unavailable, as estimated on a best-efforts basis by our external ESG data and research provider)[1].

When a new company or issuer is added to the Restricted investments list and an underlying investment manager already holds that security, AMP Investments will instruct the underlying investment manager to sell down this security as soon as practicable from when the contravention was identified. While we make every endeavour to exclude those companies and issuers on the Restricted investments list, there may from time to time be unintended exposure due to lack of data, corporate activity, or indirect exposure. The AMP Investments Restricted investments list, together with more detailed information on the screening process and definitions, can be found on our website at **amp.com.au/ampi-restrictions-list**.

The AMP Investments Restricted investment list does not apply to:

- indirectly held assets, or
- directly held assets such as cash, sovereign bonds, exchange traded funds, commodities and derivatives.

**2. Active ownership and voting**

Active ownership is the use of the rights and position of asset ownership to communicate on the activities and/or behaviour of investee companies. As part of investment research and the voting process, AMP Investments and an Investment Option's underlying investment managers may engage with the boards and management teams of companies in which an Investment Option invests.

**Directly held assets**

Where assets are directly held and invested via an investment mandate agreement, the Responsible Entity may exercise its rights as a shareholder of companies in which it invests on behalf of an Investment Option. The Responsible Entity generally delegates these actions to AMP Investments and an Investment Option's underlying investment managers.

An Investment Option's underlying investment managers are authorised to exercise any right to vote on ownership rights attached to a share or unit forming part of an Investment Option. AMP Investments, on behalf of the Responsible Entity, reserves the right to direct any voting. Further information about our approach to voting can be found in the Voting Policy which is accessible at **amp.com.au/voting-policy**.

**Indirectly held assets**

Where assets are indirectly held, through an investment manager's pooled funds, the underlying investment manager will exercise its right to vote, using its own research, views and policies. The Responsible Entity and AMP Investments are unable to influence underlying investment manager's voting decisions.

1 These restrictions do not apply to companies supplying key products necessary and intended for the production of tobacco products, such as tobacco flavouring, cigarette filters, tobacco roll paper, cigarette manufacturing machines, tobacco packaging (includes printing and labelling), speciality cigarette cartons, films, aluminium foil and marketing services or companies that manufacture and operate cigarette vending machines.

## Approach to Modern Slavery

Information on the approach to modern slavery for AMP Investments is detailed in the Modern Slavery Statement published on the AMP website which can be found online at **amp.com.au/corporate-sustainability**.

## Anti-Money Laundering and Counter-Terrorism Financing Law (AML/CTF), Sanctions Law (Sanctions), United States Foreign Account Tax Compliance (FATCA) and Common Reporting Standards (CRS) obligations

### Platform operators

To comply with our obligations under AML/CTF, Sanctions, FATCA and CRS we must collect certain information about investors, supported by relevant identification documents.

AMP may, on an ongoing and risk-based basis, request further information or documentation at any time to meet its obligations under AML/CTF, Sanctions, FATCA and CRS laws. This may include where AMP identifies changes in risk, regulatory requirements, or information previously provided by you.

### Indirect investors

The following information is mainly relevant to platform operators. For indirect investors, your financial adviser or platform operator will be able to provide you with information about how AML/CTF, Sanctions, FATCA and CRS may affect you in relation to your investment.

When you apply to invest, we rely on information provided by you to comply at all times with Australian, and all other applicable AML/CTF, Sanctions, FATCA and CRS obligations. You must notify us immediately if you are aware of, or suspect that, any monies used to fund your investment have been or will be derived from, or are related to, any money laundering, terrorism financing or similar activities that would be illegal under applicable laws or regulations or otherwise prohibited under any international convention or agreement ('illegal activities'). We may ask you, your agent or your nominated representative to provide us with additional information and assistance to ensure we are also able to comply with all applicable AML/CTF, Sanctions, FATCA and CRS obligations.

Importantly, you must notify us immediately, if you are, or become:

- a 'politically exposed' person or organisation as defined in either the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* or as defined by the Financial Action Task Force
- subject of sanctions under the *Charter of the United Nations Act 1945*(Cth)*, Autonomous Sanctions Act 2011* (Cth), Office of Foreign Assets Control (OFAC) sanctions programmes, or other applicable sanctions-related regulator, including
  - ownership or control by persons or entities referred to above, or
  - acting on behalf of or at direction of any persons or entities referred to above whether directly or indirectly, or
  - involved in a transaction or activity that may constitute prohibited dealing, facilitation or benefit under Sanctions
  - being located, organised or resident in a country or territory that is the subject of sanctions that broadly prohibit dealings with that country or territory (including Cuba, Iran, North Korea, Syria, Russia and non-government-controlled regions of Ukraine).
- a tax resident in any foreign jurisdiction including under amended CRS or FATCA requirement, or
- commonly known by a name other than the name provided in the form you completed at the time of applying for an investment.

You must notify us as soon as possible of any changes to your name or business name, address (residential or business), occupation or core business activity, or ownership or control including any beneficial owner changes or controlling person changes or where information previously provided becomes inaccurate or incomplete.

To ensure we are also able to comply with all applicable AML/CTF, Sanctions, FATCA and CRS obligations, we may:

- decide to delay or refuse any request or transaction, including by suspending the issue or redemption of units, if we are concerned that the request or transaction may breach any obligation of, or cause us to commit or participate in an offence under any AML/CTF, Sanctions, FATCA and CRS obligations, and we will incur no liability to you if we do so
- request further information from you, your agent or your nominated representative which we reasonably believe is necessary for us to comply with AML/CTF, Sanctions, FATCA and CRS obligations. Failing to provide us with this information in a reasonable time may result in restrictions on your account (including closure) in regard to any investment you have with us or the inability to establish or continue your investment with us
- take other action we reasonably believe is necessary to comply with AML/CTF, Sanctions, FATCA and CRS obligations, including disclosing any information held about you to any of our related bodies corporate or service providers whether in Australia or outside Australia, or to any relevant Australian or foreign regulator, and
- collect additional information about you from time to time, from you, your agent or your nominated representative or from other third parties, for the purposes of satisfying AML/CTF, Sanctions, FATCA and CRS obligations, and that any such information may be used and disclosed as described in our Privacy Policy which can be obtained online at **amp.com.au/privacy** or by contacting us.

# Applying for an investment

## Platform operators

### How to apply

Please contact the Client Services team on 133 267 to obtain an application form.

The application form should only be completed and signed by:

- the person who is, or will become, the unitholder
- an authorised signatory if the application is on behalf of a company, trust or superannuation fund, or
- an agent for the investor, acting under the power of attorney or as a legal or nominated representative.

All investments are made on the basis of the PDS current at the time of contributing your investment amount. You can obtain a current PDS by contacting the Client Services team on 133 267.

### Minimum investment amounts

- Initial investment – $10,000,000
- Additional investment – $5,000

We reserve the right to accept lower investment amounts.

### Submitting your application

Application forms should be mailed to:

National Mutual Funds Management Ltd - Unit Registry
GPO Box 804
MELBOURNE VIC 3001

Please include all required identification documentation when submitting your application.

## Indirect investors

Your financial adviser or platform operator will provide you with information about how to apply, including:

- the form you will need to complete
- minimum initial and additional investment amounts, and
- the method of paying your investment amount.

All investments are made on the basis of the PDS current at the time of contributing your investment amount. You can obtain a current PDS from your financial adviser or platform operator.

# Contact us

## Registered offices

ipac Asset Management Limited
Level 29, 50 Bridge Street
SYDNEY NSW 2000

National Mutual Funds Management Ltd
Level 29, 50 Bridge Street
SYDNEY NSW 2000

## Mailing address of the Investment Options

National Mutual Funds Management Ltd - Unit Registry
GPO Box 804
MELBOURNE VIC 3001

## Client services

Phone 133 267
Monday to Friday, 8.30 am - 5.30 pm (Sydney time)

email **ampinvestments@amp.com.au**

North

northonline.com.au