

**Compliance Plan
for
Commonwealth Property Office Fund
ARSN: 086 029 736**

Commencement date: 01 July 2010

Responsible Entity:

**Commonwealth Managed Investments Limited
(CMIL)**

ABN 33 084 098 180

AFSL No. 235384

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Part 1

Definitions

In this Compliance Plan, the following phrases have the meaning defined below unless specifically stated otherwise.

Phrase	Meaning
Act	Corporations Act 2001 (Cth) and its Regulations. All legal references relate to the Act unless indicated otherwise.
AFSL	Australian Financial Services Licence
ASIC	Australian Securities and Investments Commission
ASIC Policy	Regulatory guidance and similar forms of information issued by ASIC from time to time
CO	ASIC Class Order
CMIL	Commonwealth Managed Investments Limited
Compliance Committee or Committee	The Compliance Committee required under Part 5C.5 of the Act for a registered managed investment scheme, or the committee that is appointed by an RE to undertake the functions of a compliance committee where there is not a specific legislative requirement to have a committee
Compliance Plan or Plan	The Compliance Plan required under Part 5C.4 of the Act for a registered managed investment scheme. The Compliance Plan for each Scheme consists of the Master Plan plus the Scheme Specific Plan (i.e. Part 7) where required
Constitution	The governing document of the Scheme
Group	Commonwealth Bank of Australia group
Master Plan	The Master Plan consists of Parts 1 – 6 of this document
Members	Unless otherwise stated, the Members of the Scheme to which this Plan applies
Offer Document(s)	Includes Information Memoranda and/or Product Disclosure Statements issued with respect to a Scheme in accordance with the Act, and any supplementary document to the original issued in respect of a Scheme
Plan Auditor	The auditor appointed by the RE under s601HG of the Act to audit compliance with the Scheme's Plan
Regulation or reg	Corporations Regulations 2001 (Cth)
Responsible Entity or RE	The company registered by ASIC as the Responsible Entity of the managed investment scheme to which this Compliance Plan applies, and any other Scheme that uses the Master Plan
RE Board	The directors of the RE
Responsible Person	The person employed in the position having an ongoing functional responsibility for the compliance obligations allocated to them under this Plan

RG	ASIC Regulatory Guide
Scheme	A managed investment scheme registered with ASIC
Scheme Specific Plan	The additional processes (i.e. Part 7) supplementing the Master Plan particular to a Scheme's Compliance Plan. Where monitoring of an obligation for a Scheme differs from the monitoring processes and practices of the Master Plan, the provisions of the Scheme Specific Plan take precedence
Section or Part references	Sections and Parts are references to sections and Parts of the Act, and sections are also referred to using the abbreviation of "s"
Service Provider	Any entity or person who is appointed to perform services and functions on behalf of the RE in relation to a Scheme
Year or yearly	The year is the 12 month reporting period of the Scheme to which this Compliance Plan applies, which will be 1 July to 30 June unless otherwise specified in the Scheme documentation

Roles and accountabilities of Responsible Persons

The responsibilities set out in Part 5 are undertaken by persons with the following roles and responsibilities within the RE:

Management	<p>Management are the persons who are responsible for:</p> <ul style="list-style-type: none"> • Finance teams • Information technology • Investor Relations; • Operations • Treasury <p>It includes the following roles:</p> <ul style="list-style-type: none"> • Fund Accountant and Fund Finance Manager • Head of CFSGAM IT • Head of Investor Relations • Head of Operations • Executive Manager, Treasury
CFO	<p>Chief Financial Officer for the RE. It includes the following roles:</p> <ul style="list-style-type: none"> • Chief Financial Officer, CFSGAM
Investor Relations	<p>The representatives with responsibility for complaints handling. It includes the following roles:</p> <ul style="list-style-type: none"> • Head of Investor Relations
Company Secretary (CS)	<p>Representative with responsibility for the company secretarial functions for the RE and the Scheme. It includes the following roles:</p> <ul style="list-style-type: none"> • Company Secretary
Financial Controller (FC)	<p>The Financial Controller with accountability for unit pricing, asset valuations, fees and charges, distributions and related services. It includes the following roles:</p> <ul style="list-style-type: none"> • Financial Controller

	<ul style="list-style-type: none"> • Head of Treasury • Head of Statutory Reporting
Fund Manager (FM)	The Fund Manager with accountability for the management of the Scheme.
Legal	Representative with Responsibility for the legal advisory function for the RE and the Scheme.
Representatives	Employees of the RE or of a related body corporate who perform functions and obligations for the RE
RM&C	<p>The risk management and compliance personnel responsible for monitoring compliance with the obligations and key controls relevant to the Scheme. It includes the following roles:</p> <ul style="list-style-type: none"> • Head of Risk Management & Compliance (Head of RM&C) • Risk and compliance personnel (RM&C)

Part 2
The Compliance
Plan

1. APPLICATION OF THE COMPLIANCE PLAN

Context and interpretation

s601HA This Plan is prepared by Commonwealth Managed Investments Limited ABN 33 084 098 180 in accordance with the Act for the registered managed investment scheme described in this Plan, and for which it is the RE under the Act.

s601HA(1) This Plan describes key controls and measures in place that aim to ensure that the business activities of the RE in operating the Scheme comply with the Act and the Constitution. The Plan does not attempt to describe every key measure, nor the detail of all structures, systems and processes in place.

The structures, systems and processes described in this Plan may be carried out by the RE or by related entities within the Group or by other Service Providers.

s601HE Subject to the Act, the RE may determine that this Plan applies to a further Scheme, or ceases to apply to a Scheme.

s601HB(1)
CO 98/50 The provisions in Parts 1 through 6 of this Plan are intended to be incorporated into Plans for other registered Schemes of the RE, resulting in this Plan being the Master Plan for the RE.

Where required, Part 7 of the Plan contains the Scheme Specific Plan for an individual Scheme operated by the RE.

Where there is any discrepancy between the Master Plan and a Scheme Specific Plan, the compliance method, Responsible Person and timing specified in the Scheme Specific Plan will have precedence.

2. PURPOSE OF THE COMPLIANCE PLAN

s601HA(1) The Plan sets out the procedures the RE must follow in operating the Scheme to ensure it complies with the requirements of the Act and the Constitution. It forms part of the RE's overarching compliance program.

The RE may adopt certain other practices to achieve compliance in relation to this Plan, including ASIC Policy, Group policies and procedures and develop other documents and systems to set out in greater detail matters covered by the Plan. These documents operate alongside the Plan, but are not part of it.

3. COMMENCEMENT

s601HC

This Plan takes effect for the Scheme either when:

1. the Scheme is registered by ASIC, or
2. the date the Plan is adopted as the plan for the Scheme.

4. CHANGING THE COMPLIANCE PLAN

s601HE

Reg 5C4.01

The RE may modify any part or replace in its entirety this Plan.

5. SPECIFIC COMPLIANCE OBLIGATIONS

The RE must ensure that RM&C has the necessary skills, experience and resources in compliance and risk management in order to facilitate the discharge of the obligations stated in this Plan and the compliance arrangements are adequate.

The Head of RM&C must ensure that the compliance personnel have adequate skills and resources to discharge the functions under the Plan.

The key functions of RM&C in relation to the Plan are:

- a) monitoring as described in Part 4;
- b) preparing, in a form approved by the Compliance Committee, a report identifying any breaches of the Plan (including identifying whether or not they are systemic) and any action taken or proposed to be taken to correct the breaches;
- c) giving the report as to these matters to the Compliance Committee as soon as possible, if the Head of RM&C suspects that any breach has had or is likely to have a material adverse affect on Scheme Members;
- d) reporting to the RE Board on breaches of the Plan (including identifying whether or not they are systemic) and any action taken or proposed to be taken to correct the breaches;
- e) ensuring that records of the RE for the relevant item of the compliance duty comply with the language, format, retention and access requirements of the Act, and;
- f) ensuring that copies of the Plan are made available.

The Head of RM&C may bring any matter relating to the operation of the Plan, to the attention of the board of directors of the RE and/or the Compliance Committee.

6. INTERNAL AUDIT

In addition to the agreed audit plan, internal audit has the power to investigate matters at its own initiative and may report relevant results in relation to the Schemes to the RE, the Compliance Committee and Management.

Recommendations made by internal audit, affecting the operative parts of the Plan, will be notified to Management and RM&C, and where required a remedial action plan agreed with progress against that plan monitored by RM&C.

Part 3

This Part 3 sets out the procedures the Compliance Committee must follow in accordance with the Act.

The Compliance Committee

The RE and the Compliance Committee may develop other documents and systems (such as the Compliance Committee charter) to set out in greater detail the procedures the Compliance Committee must follow. They operate alongside the Plan but are not part of it.

1. ARRANGEMENTS

s601HA(1)(b)

Charter

The RE Board will adopt a Charter for the Compliance Committee from time to time. The Charter will include the Committee's access to information and resources of the RE.

Functions

s601JC(1)(a)

The Committee will monitor to what extent the RE complies with this Plan and report on its findings to the RE Board.

s601GA
s601JC(1)(b)

The Chair of the Committee will communicate to the RE Board the following matters of which it becomes aware or suspects:

- Any breach of the law involving the Scheme; and
- Any breach of the provisions included in the Constitution

s601JC(1)(c)
s601GA

The Committee will notify to ASIC, if it is of the view that the RE Board has not taken, or does not propose to take appropriate action, to deal with a matter reported by the Committee to the RE Board.

s601JC(1)(d)

The Committee will assess at least every year whether this Plan meets the requirements of the Act, report to the RE Board on the assessment and make recommendations to the RE about any changes that it considers should be made to the Plan.

2. MEMBERSHIP

Minimum number & restrictions on Membership

s601JB

The RE Board must ensure that the Committee has at least 3 members at all times. The majority of them must be external members. Committee members will be appointed by the RE.

A person must consent to their appointment to the Committee. The consent may be confirmed in writing after their appointment.

Resources and skills

The Committee must inform the RE Board if it forms the view that a member of the Committee, the full Compliance Committee, a proposed member of the Committee, or RM&C does not have sufficient skills, experience or resources to undertake a given responsibility.

Removal by RE

The RE may remove a member of the Compliance Committee by notice to them. There must be at least 14 days notice unless the RE considers that their removal on shorter notice is in the best interests of members of the relevant Scheme or (subject to their terms of appointment) the Committee member is in breach of their terms of appointment.

A member of the Committee who is an employee ceases to be a member once their employment is terminated, or at such other times as the RE determines.

Retirement by member

An external member of the Committee may retire on 3 months notice to the Committee and the RE, or any other period that the RE agrees.

3. MEETINGS

Frequency and mode of meetings

s601JH

The Compliance Committee must meet at least 4 times each year, unless the Committee members agree that it is not necessary or desirable for a particular meeting to be held. A meeting may be held using any technology agreed to by all Committee members.

Management will be available for attendance (if required) at any meeting of the Compliance Committee. The Head of RM&C or delegate will normally attend Committee meetings.

Quorum

s601JH(1)

The quorum for a meeting is 3 Committee members of which a majority must be external members. If a quorum is not present within 15 minutes, the meeting is adjourned to a place and time that the Committee members present decide. They must tell the other Committee members of the time and place.

At any adjourned meeting, those members of the Compliance Committee present constitute a quorum provided that there is at least as many external as other members.

Chair

The RE may appoint a chair for a meeting or for a term, and terminate that appointment at any time. If no chair is so appointed or present at a meeting, the Committee members present may elect a chair for the meeting. Any chair must be an external member of the Compliance Committee.

The chair may determine how a meeting will be conducted.

The decision of the chair on any matter relating to the conduct of a meeting is final.

Adjournment

The Committee may adjourn a meeting for any reason to a place and time it considers appropriate.

Voting

Voting at a Committee meeting is by simple majority. The chair has a casting vote. No objection may be made to any vote cast unless the objection is made at the meeting.

Minutes

s601JH(2)

The chair must arrange for minutes of meetings to be kept.

4. REPORTS AND RECOMMENDATIONS**Reports to Compliance Committee**

The Compliance Committee may determine the form of any report that RM&C is to provide under this Plan.

Reports of Compliance Committee to RE

s601JC(1)

The Committee must report to the RE on compliance matters as reasonably required by the RE or as otherwise determined to be necessary by the Committee to discharge its functions properly.

Records

s601JH(2)

The chair must arrange for records of reports and recommendations of the Committee to be kept.

5. ACCESS TO INFORMATION AND RESOURCES**Access to information, personnel resources and auditor**

Charter

The RE must ensure that each Member of the Compliance Committee has access to:

- a) information, including accounting records and information relevant to compliance with the Act , and Responsible Persons of the RE and;
- b) the Plan auditor and Scheme auditor, for the purpose of carrying out the functions of the Compliance Committee.

Charter	<p data-bbox="391 129 577 161">External advice</p> <p data-bbox="391 224 1469 347">If the Committee wishes to commission independent legal, accounting, or other professional advice at the reasonable expense of the RE, the Committee Chair will provide details of the proposal to the Chair of the RE Board.</p> <p data-bbox="391 409 1465 488">The Chair of the RE Board may, to assist the Committee, arrange the advice being sought or delegate to such person as the Chair may direct.</p>
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Part 4

The Compliance Procedures

This Part 4 sets out the procedures for the layers of the assurance process that collectively assist in achieving compliance with this Plan and the Act, Constitution and requirements of the RE from time to time.

1. COMPLIANCE PROCEDURES

Assurance Model

The compliance structure utilises a three layer assurance model, comprising:

- **Layer 1:** line management implements procedures that are designed to ensure the business is compliant and remains compliant, with the applicable legislation and regulations and any relevant organisational policy requirements.
- **Layer 2:** an independent compliance function (RM&C) comprising business area specific compliance units that assists the business in managing its risks and satisfying its obligations; it reviews, monitors and tests key controls, and monitors the business' compliance with all AFSL and Scheme obligations.
- **Layer 3:** Group Audit and external audit provide the final layer of assurance through their independent review and oversight of the control environment.

Minimum requirements of RM&C

RM&C must, at a minimum:

- monitor at the intervals specified in Part 5 that the RE complies with the applicable provisions of the Act and any other relevant provisions for that compliance obligation;
- monitor at the intervals specified in Part 5 that the methods and procedures (key controls) which the RE uses to achieve compliance are complied with and continue to be appropriate and effective to achieve the requirements.

The monitoring may include, but is not limited to:

- testing of key controls
- review of documentation and data sources to evidence the controls are implemented and in use as expected; and
- attestations from Responsible Persons on a periodic basis.

Responsible Persons

The Responsible Persons (as designated in Part 5) have an ongoing functional responsibility for the compliance obligations allocated to them under this Plan. Each Responsible Person must identify and make themselves familiar with each of the compliance obligations in Part 5 for which they are responsible and confirm on a Yearly basis the method utilised to comply with these obligations. The Responsible Persons may delegate responsibility for their compliance obligations to appropriately skilled personnel. Details of the delegations need to be appropriately documented.

Policy and procedures

The Plan refers to a number of policies that support the methods outlined in Part 5 of the Plan. These documents are subject to review processes, which may vary depending on the nature of issues they cover, however most commonly are reviewed yearly, unless otherwise determined by the RE. In the event that the RE Board determines that a policy is reviewed less frequently than Yearly, that will be captured in the RE Board minutes.

All policies are made available to Responsible Persons that have accountability for delivery of the compliance method specified in this Plan. The monitoring of compliance with policies is undertaken in accordance with the three-layer assurance model.

PART 5

The Compliance Obligations

Part 5 contains a table which identifies compliance obligations. For each obligation, the relevant Responsible Person is identified and the main provisions of the Corporations Act, the Corporations Regulations and the Constitution that are relevant to the obligation are noted. This table is a guide only. There may be other laws and requirements that are relevant to the compliance obligation.

The table also contains a high level description of the key controls utilised to ensure compliance with each obligation. Relevant testing of key controls is performed by the Risk Management & Compliance team at regular intervals as per the table.

Section 1: Property – Identification, Operation and Custodian					
No	Legal ref	Obligation	Key Controls	Responsible Person(s)	RMC Monitoring Frequency
1.1.1.	s601FC(2) s601FC(1)(i) CO 98/51	Identification Scheme property must be held on trust, and is clearly identified as scheme property in financial accounts and other records. At	The RE Board approves the establishment of the Scheme and each is constituted as a separate trust.	Company Secretary	Half yearly
1.1.2.	RG 133	minimum, scheme property must be held in the name of the RE or custodian, or their	Separate investment and accounting records for each Scheme are maintained.	CFO	Half yearly

Part 5: Compliance Obligations

1.1.3.		agent, and in no other name. Scheme property must be held separately from the personal assets of the RE and custodian and any other scheme.	The custodian separately identifies and reports monthly on assets owned by the Schemes.	FC	As required
1.1.4.		Where scheme property is held in an omnibus account, records must be maintained clearly identifying each Scheme's right in the account.	Scheme financial records are reconciled at least monthly to those of the appointed custodian. Variances identified through reconciliations are investigated and resolved. Reconciliations are subject to peer review and signoff.	FC	Quarterly
			At least monthly, a cash reconciliation is performed by the Fund Accountant of the Scheme to reconcile the cash balances in the financial system to the physical bank accounts. Variances identified through reconciliations are investigated and resolved by the relevant team. Cash reconciliations are subject to peer review and signoff.	FC	Quarterly
1.1.5		Documentation establishing ownership must be held by the RE or its appointed custodian for all assets of the Scheme.	Documentation establishing evidence of ownership or cessation of ownership is obtained by the Operations team (this may be in the form of certificates, electronic records from an approved market or custodian etc) and fund records are maintained clearly identifying each scheme's rights to the physical assets.	Head of Operations FC FM	Half yearly
1.2.1	s601FC(2)	Holding Scheme property must be held separately	Scheme property is held by the RE or by an appropriately licensed custodian, or by their nominated agent.	Head of Operations	Half yearly

Part 5: Compliance Obligations

1.2.2	s601FC(1)(i) CO 98/51 RG 133	from the RE's property and property of any other schemes. At a minimum, relevant systems and organisation structure of the RE or custodian, or their agent must: <ul style="list-style-type: none"> • result in effective separation of the RE's property and property of any other schemes; and • accurately give effect to class order relief allowing assets to be held in omnibus accounts. 	Financial records are reconciled at least monthly to those of the appointed custodian or other third party source by the Fund Accountant for the Scheme. Variances identified through reconciliations are investigated and resolved. Reconciliations are subject to peer review and signoff.	FC	Quarterly
1.2.3			At least monthly, cash reconciliation is performed by the Fund Accountant of the Scheme to reconcile the cash balances in the financial system to the physical bank accounts. Variances identified through reconciliations are investigated and resolved by the relevant team. Cash reconciliations are subject to peer review and sign-off.	FC	Quarterly
1.2.4			The custodian separately identifies and reports on assets owned by the Scheme.	Head of Operations FM	Half yearly
1.3.1	RG 133	Income Income from scheme property must be collected in a timely way, and such collection must be accurate and complete.	<ul style="list-style-type: none"> • Income and corporate actions accruing to Scheme assets are recorded in the accounting system on an ongoing basis. • Income and corporate action entitlements are deposited into the Scheme bank account or into the relevant custodian or agent trust account as soon as practicable after receipt by the Fund Accountant. • Entitlements due, but not received, are 	FC	Half yearly

Part 5: Compliance Obligations

			investigated and recovery action is initiated.		
1.3.2			<ul style="list-style-type: none"> For direct property, rental income, net of authorised expenses, is remitted from the managing agents trust account to the Scheme bank account. Expenditure by managing agents above the authorised limits is referred to the investment manager for formal approval or, if not authorised, action is taken to recover the expenditure debited from the income remitted. Income received is compared to forecast budget and material variances subject to an analysis. In the event of material discrepancy, the Asset Manager and Fund Accountant investigate the discrepancy and if required will instigate action to redress shortfall from the managing agent. 	FC	Half yearly
1.3.3			Financial records are reconciled at least monthly to those of the appointed custodian by the Fund Accountant. Variances identified through reconciliations are investigated and resolved. Reconciliations are subject to peer review and signoff.	FC	Quarterly
1.4.1	RG 133	Custodian	The initial appointment of custodians is subject to the Group Outsourcing Policy.	Head of Operations	Yearly

Part 5: Compliance Obligations

1.4.2		Where a custodian other than the RE is appointed, it must be appointed pursuant to a written agreement.	Any new custodian agreements comply with relevant obligations.	Legal	As required
1.5.1		<p>The custodian must:</p> <ul style="list-style-type: none"> • have adequate qualifications, skills and resources; and • evidence it is adequately segregating its personnel; and • through the agreement, be able to report directly to the Compliance Committee or the RE if it so requires. 	<p>A due diligence review is conducted to ensure proposed custodians:</p> <ul style="list-style-type: none"> • have met, and are capable of continuing to meet, relevant ASIC or local regulatory standards; • have internal controls in place which are adequate and satisfy the obligations of this Plan; and • have sufficient insurance arrangements in place prior to entering the custodian agreement. 	Due Diligence Committee	Yearly
1.6.1	RG 133	<p>Obligations under custody agreement</p> <p>A custodian must meet its obligations to comply with the custody agreement</p>	Custodians are monitored through regular due diligence reviews or monitoring. Relevant service issues are tracked to resolution.	Head of Operations, FM, FC	Yearly
1.6.2	An attestation report from each third party custodian is obtained as at 30 June each year to demonstrate that they continue to meet ASIC's standards and the obligations of the custody agreement.		Head of Operations	Yearly	
1.6.3	Audited internal control reports are provided by each third party custodian at least yearly.		Head of RM&C	Yearly	

1.7.1	S601FC RG132.25	Insurance of Scheme Assets The RE must ensure that appropriate insurance is in place for all identifiable risks relevant to the nature of the Scheme's assets.	A yearly review is undertaken to ensure insurances are in place for the insurable assets of the Scheme. Confirmation is received from the business either: <ul style="list-style-type: none"> • as the assets are insured – new scheme assets, or • at least annually for ongoing asset insurance, or • where a change occurs in the structure of the asset, that insurance has been amended to reflect that structural change. 	FM	Yearly (or when new assets are acquired or other business activity triggers insurance arrangements)
Section 2: Valuation of Scheme Assets					
2.1.1	Constitution s601FC(1)(j) CO 05/26 Unit Pricing Permitted	Valuation Scheme property must be valued at regular intervals appropriate to the nature of the assets. The valuation methodology and timing must comply with the Constitution.	Scheme assets are valued in accordance with the stated methodology in the Scheme Constitution and Offer Documentation using pricing information obtained from an independent supplier, at a minimum each asset is valued yearly on a rolling basis,	FM	Half yearly
2.1.2	Discretions Policy Offer document		Valuations of assets are reviewed for reasonableness in terms of the particular asset class and material variances from that standard are investigated, based on a predicative model for valuation.	FM	Quarterly

Part 5: Compliance Obligations

2.1.3			Valuation changes are taken into the financial position of the Scheme based on the final valuation report being received to ensure that approved and agreed value is applied for all Scheme members.	FC	Half yearly
2.1.4			In circumstances where the assets cannot be valued using ordinary market valuation methodology, the asset is, subject to the Constitution and Offer Documents, valued in accordance with generally accepted Australian accounting standards.	FM	As instances occur
2.1.5		Frequency of valuation must be consistent with RE Board approved requirements and Constitution.	Scheme property is valued at regular intervals appropriate to the nature of the property and within the timeframes specified in the Valuation Policy.	FM	Half yearly
2.1.6			A report outlining the movement of the current valuation price against the preceding price is generated from the financial system. Asset price movements exceeding predefined tolerances are investigated and resolved by the Finance Manager and Fund Analyst, and thereafter subject to a peer review and signoff.	FM and FC	Quarterly
Section 3: Audit of Plan and Scheme					

Part 5: Compliance Obligations

3.1.1	s331AAA s331AAB, s601HG,	<p>Appointment of Auditors</p> <p>3.1 The Plan Auditor and Scheme Auditor must be appropriately qualified, independent and eligible to act</p> <p>Terms of appointment of scheme auditor must:</p> <ul style="list-style-type: none"> • be appropriate per Auditing Standards; • set out the scope, objectives and nature of the audit, • define management responsibility, • describe the auditor's right to access information; and • be monitored regularly for conformity to the Act and the terms of the appointment. 	The appointment of the Plan and Scheme auditor(s) includes consideration of the terms of appointment against relevant legislative requirements and standards.	CFO RM&C	Yearly
3.1.2	s601HH, s601HI reg 2M.4.01 Part 2M.4 s601HG, Auditing		A review is undertaken of auditor engagement letters, when there are changes in audit requirements or when the term of the current auditor engagement letters are due to expire. The review includes consideration of the terms of appointment against relevant legislative requirements and standards.	CFO RM&C	Yearly
3.1.3	Standard ASA 210: Terms of Audit Engagements		The terms of appointment of the Scheme and Plan auditor(s) is subject to resolution by the RE Board.	Company Secretary	Yearly
3.2.1	Part 2M.3 s331AAA	<p>Appointment, removal and resignation</p> <p>ASIC must be notified of the appointment</p>	The appointments, removal and resignations of the Plan Auditor and Scheme auditor is subject to resolution by	Company Secretary	Yearly

Part 5: Compliance Obligations

3.2.2	s331AAB s331AC s601HG s601HH s601HI	and removal of the auditors, or if the auditor becomes ineligible. An appropriately qualified compliance plan auditor must be appointed on the removal or retirement of the existing compliance auditor and in the case of the scheme auditor, an appropriately qualified scheme auditor must be appointed within 1 month of a vacancy occurring	the RE Board.		
3.3.1	Part 2M.3 Part 2M.4 s601HG	<p>Conduct of audit</p> <p>Auditors must comply with the duties and provide the reports required by the Act, including:</p> <ul style="list-style-type: none"> • independence declaration, • provision of required audit reports on schemes and plans; and • reporting that the RE acts appropriately in relation to any issues raised in the audit. 	Recommendations made by Plan Auditors are notified to Management, Compliance Committee and the RE Board.	Head of RM&C	Half yearly
3.3.2	s307		Material findings of the Plan Auditors are reported to the Compliance Committee and the RE Board to assist in the discharge of responsibilities.	Head of RM&C	Half yearly
3.3.3			An action plan to deal with matters raised by Plan Auditors is agreed, and progress against the plan is monitored.	Head of RM&C	Half yearly
3.3.4			Any action not completed by the agreed target date is reported to the Compliance Committee and the RE Board.	Head of RM&C	Half yearly
3.4.1		Access and assistance	Access for the auditors is undertaken by liaising with the	Head of	Yearly

Part 5: Compliance Obligations

	s310 s312 s601HG(6)	At all reasonable times, auditors must have the right to access books of the scheme and require any officer to give information, explanations or other assistance. An officer of the RE must allow access to such books and give such assistance to the auditor as described above.	audit firm to agree access rights, timing of onsite requirements, people they may require access to, and to provide the information required to conduct the audits.	RM&C CFO	
3.5.1	S601HG(7)	Compliance Plan Audit reports Compliance plan audit reports must be prepared and lodged with ASIC within three months of the end of the financial year.	Compliance Plan Audit reports are lodged with ASIC within 3 months of the end of the financial year. Records of lodgement are retained as part of Scheme records.	Company Secretary	Yearly
Section 4: Adequacy of Records					
4.1.1	S286	Record of scheme operations The scheme's operations must be recorded properly. At minimum:	A three-way reconciliation between the financial system, registry system and general ledger is performed by the Fund Accountant. Variances identified in the reconciliation are investigated and resolved. The reconciliation is subject to peer review and signoff.	FC	Quarterly

Part 5: Compliance Obligations

4.1.2		<ul style="list-style-type: none"> records are maintained accurately to correctly record and explain transactions, financial position and performance information is retained to enable true and fair financial statements to be prepared 	Trial balances are downloaded from the General Ledger at least half yearly. Any discrepancies between the trial balances and the financial system are investigated and reconciled by the Statutory Reporting team. A peer review is conducted on the resolved discrepancies.	CFO Statutory Reporting	Half Yearly
4.1.3			Adherence to Scheme accounting and tax policies is subject to external audit review.	CFO	Half yearly
4.2.1	Part 2M.2 s169 s286	Record standards Records must comply with the language (English), format (if electronic, convertible to hard copy), retention (at least seven years) and access requirements (directors must have access).	Financial records are made available in English in electronic copy or hard copy as required by users.	CFO	Yearly
4.2.2	s1101C		Financial records are archived and retained for a period of at least seven years.	Head of GAM IT	Yearly
4.2.3			Backups are automated within the Backup System and schedules are based on defined Backup Policies. Backup tapes are moved offsite on a daily basis and signed receipts are kept as evidence.	Head of GAM IT	Yearly
4.2.4			Business continuity plans (BCP) are in place and tested at least yearly to ensure that recovery strategies are appropriate for business operations. Test reports are produced and issues are tracked to resolution.	Head of Operations	Yearly

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4.2.5			BCP are reviewed at least yearly to ensure their ongoing appropriateness for the business operations.	Head of Operations	Yearly
4.2.6			Records and data on registry systems and accounting systems are retained for at least 7 years in accessible and readable formats.	Head of GAM IT	Yearly
4.3.1	Part 2M.3, s319 s320 Australian Accounting Standards RG 68	Financial Statements Yearly and half yearly financial information must be prepared in accordance with the Act and ASIC Policy to comply with accounting standards and to give a true and fair view of the scheme's financial position. Such reports must also be lodged with ASIC (within three months of the end of the financial year for yearly reports and 75 days of the end of the half-year for half yearly reports).	The yearly (and where required half yearly) financial statements are prepared using records maintained for the Scheme in accordance with these requirements.	FC CFO	Half yearly
4.3.2			Trial balances are downloaded from the General Ledger at least half yearly. Any discrepancies between the trial balances and the financial system are investigated and reconciled by the Statutory Reporting team. A peer review is conducted on the resolved discrepancies.	CFO Statutory Reporting	Half Yearly
4.3.3			Adherence to Scheme accounting and tax policies is subject to external audit review.	CFO	Half yearly
4.3.4			Work-files and financial statements are reviewed by a person independent from the preparer.	FC, CFO	Half yearly
4.3.5			Financial statements and disclosures are reviewed prior to approval by the RE Board.	CFO	Half yearly

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4.3.6			Yearly financial statements are lodged with ASIC within 3 months of the end of the financial year. Records of lodgement are retained as part of Scheme records.	Company Secretary	Yearly
4.3.7			For relevant Schemes, half yearly financial statements are lodged with ASIC within 75 days of the half year end. Records of lodgement are retained as part of Scheme records.	Company Secretary	Half yearly
4.4.1	Part 2C s169 reg. 5C.11.03	Register of Members The register of Scheme Members must be kept up to date, and contains the information required by s169 (e.g. name and address of Member, date of issue and withdrawal, number and class of interests) and be kept at the location required by the Act and for at least seven (7) years.	System-enforced data validation rules are in place in the Registry System that highlight or prevent transactions from being processed without mandatory information being input.	FC	Yearly
4.4.2			Non-electronic requests for changes to static data (e.g. bank account details, reinvestment options, Power of Attorney etc) are entered into the Registry System by an Administrator who checks key details on the request against source documentation.	FC	Quarterly
4.4.3			Static data changes which cannot be processed due to incomplete information are held (not processed) until the information has been received		

4.4.5			Records and data on registry systems and accounting systems are retained for at least 7 years in accessible and readable formats.	Head of GAM IT	Yearly
Section 5: Adequacy of Capital, Liquidity, Insurance and Compensation Arrangements					
5.1.1	s912A(1) AFSL conditions RG 166	Maintenance of minimum financial requirements Ongoing net tangible assets, financial position and ability to satisfy ongoing cash requirements must comply with the financial conditions of the licence, namely solvency, minimum cash requirements and net tangible assets	Financial calculations are performed monthly by the Statutory Reporting team in order to confirm ongoing minimum financial requirements are being met. Information is reviewed against AFSL conditions to ensure no material changes have occurred.	CFO	Monthly
5.1.2					
5.2.1	s912D Reg 7.6.04(1)	Material changes Material changes in the financial position must be reported to ASIC by the RE Board.	On a monthly basis, any matters that have arisen which may reasonably be expected to affect the RE's eligibility to hold a licence are reported to the RE Board. Reporting is provided to the RE Board of any material changes including review of relevant compliance reports and the records of lodgements with ASIC.	CFO	Monthly
5.2.2				Head of RM&C	As required

5.3.1	s912A(1)(b) AFSL conditions RG 126	Insurance Insurance must meet the requirements of the Act, ASIC Policy and the RE's licence, namely covering professional indemnity and fraud by officers.	Insurances are reviewed against Act and licence requirements yearly.	Head of RM&C	Yearly
5.4.1	s912A(1)(b) 912B AFSL conditions RG 126	Compensation arrangements Compensation arrangements for retail clients must meet the requirements of the Act, the RE's licence and relevant ASIC Policy, namely professional indemnity insurance cover that is adequate having regard to the nature of the RE's business and its potential liability for compensation claims	Compensation arrangements are reviewed to confirm that they meet the requirements of the Act and the RE's AFSL.	Head of RM&C	Yearly
Section 6: Unit Price Calculation and Issue and Withdrawal Procedures					
6.1.1	Constitution s601GA(1)(a) s601GA(4) RG 94 Unit Pricing	Unit Pricing Prices used for issue, withdrawal and reinvestment must be calculated in accordance with the formula and at such times as set out in the Constitution, RG 94	The unit pricing methodology is set consistently with the Constitution, the Offer Documents and generally accepted Australian accounting principles. The process is determined by senior management who are responsible for unit pricing.	FM, FC and CFO	Half yearly

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6.1.2	Permitted Discretions Policy CO 05/26 Offer document	and the Act. Discretions exercised by the RE in calculating unit prices must be exercised reasonably and according to the RE's Unit Pricing Permitted Discretions Policy.	The upload of data between the general ledger, financial systems and registry is manually checked before pricing commences each month. This is reviewed and signed off using a checklist which details all checks required to be performed to ensure that the upload of data is accurate and complete.	FC	Quarterly
6.1.3			Unit price and performance calculations are determined on a monthly basis. The Fund Accountant performs a series of manual checks on the hard copy of the system generated reports which make up the unit pricing pack to determine whether the general ledger and financial system accurately reflects fund movements. The unit pricing packs are subject to peer review and signoff.	FC	Quarterly
6.1.4			A three-way reconciliation between the financial system, registry system and general ledger is performed by a Fund Accountant. Variances identified in the reconciliation are investigated and resolved. The reconciliation is then subject to a review and signoff process.	FC	Quarterly
6.1.5			If the RE exercises discretions in calculating unit prices, then the discretions are either: <ul style="list-style-type: none"> • exercised in accordance with the Unit Pricing Discretions Policy, or 	FC Head of RM&C	Half yearly

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			<ul style="list-style-type: none"> a written record is included on a register explaining how the discretion was exercised and why such exercise was reasonable. 		
6.1.6			A register is kept to record all situations where the discretion has been exercised, including circumstances where the discretion is exercised in a manner that is different to that of the Unit Pricing Discretions Policy.	FC	Yearly
6.1.7			Under certain market conditions, the RE may elect to suspend unit pricing or the withdrawal of units, in accordance with the Constitution and the RE's policy in respect of suspension.	CFO	As required
6.2.1	RG 94 (joint ASIC and APRA guide)	Unit Pricing errors The RE must comply with relevant ASIC Policy if incorrect pricing takes place and must determine if compensation is required as a result of incorrect pricing	Prices are re-calculated when pricing errors are identified for the purposes of calculating compensation payments and for the re-issue of the unit prices to Members.	FC	Quarterly
6.2.2			Where compensation is required Member impacts are calculated.	FC	Quarterly
6.2.3			Members and the Scheme are compensated for unit pricing errors in accordance with the Compensation Policy.	FC	Half yearly

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6.3.1	Constitution s601GA(1)(a) s1016A Offer document CO 02/262	<p>Processing applications and transfers</p> <p>Applications, transfers must be processed in accordance with the Constitution, Offer Document and Act. At minimum:</p> <ul style="list-style-type: none"> • documentation must be complete; • the requirements for applications and associated documentation must be met; and • processing must be in a timely manner. 	Non-electronic applications are entered into the Registry System by an Administrator who checks that it has been received in the correct format, relevant details have been received and that it has been executed by the client. Applications that cannot be processed are held unprocessed until the information has been received.	FC	Half yearly
6.3.2			Units are automatically allocated to account transactions in the registry system such that the dollar value of the transaction is equal to the number of units at the current market value.	FC	Yearly
6.3.3			Unit prices are automatically uploaded from a restricted access to directory to the registry system against the correct fund. Unit prices are automatically released to the web portal.	FC	Yearly
6.4.1	s1017E reg 7.9.08A	<p>Application proceeds</p> <p>Application money or property must match the application form and either is applied in respect of the issue of interests in a scheme or held in a bank account (not forming part of the scheme) on behalf of or for the benefit of the person who paid the money. Within one month, the RE must return the money, issue</p>	Reconciliation between the registry system and the closing bank account balance for the Scheme is completed by the Fund Accountant on a monthly basis. Reconciliations are reviewed subject to peer review each month, and any unreconciled items are followed up and cleared.	FC	Half yearly
6.4.2			A three-way reconciliation between the financial system, registry system and general ledger is performed by a	FC	Quarterly

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		the interests or otherwise deal with the money as specified in the regulations, unless it is not reasonably practicable to do so within one month, in which case the RE can deal with the money in such longer period as is reasonable in the circumstances.	Fund Accountant monthly. Variances identified in the reconciliation are investigated and resolved. The reconciliation is then subject to a review and signoff process.		
6.4.3		Interest on monies held in such bank accounts must only retained by the RE if the offer document discloses that the RE is keeping interest earned on such accounts.	Money not immediately applied in respect of the issue of units is held in a trust account (not forming part of the Scheme) for a maximum of one month (or a longer period if reasonable). Procedures are in place to identify unallocated items and refund monies within the stipulated time.	FC	Monthly
6.4.4			Confirmation is received that bank accounts are non-interest bearing at least yearly.	CFO	Yearly
6.5.1	Constitution s601GA(4) s601KA Offer documents	Scheme liquidity Scheme liquidity and any risks must be monitored to determine if the scheme is liquid as defined in the Act and if illiquid :	The Scheme is monitored to confirm the Scheme is liquid and is continuing to meet the applicable requirements of ASIC Policy.	FM and FC	Quarterly
6.5.2		<ul style="list-style-type: none"> any withdrawal offers must be made and withdrawals processed as the Act, the Constitution and the Offer Document requires. 	If a situation of illiquidity occurs, responsible personnel determine when withdrawal offers are made and on what terms (which includes determining whether to cancel any withdrawal offers). All withdrawal offers are formally approved by the RE Board prior to being made available to Members.	FM, Legal	Quarterly

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6.5.3			Information with regards to the level of withdrawal offer acceptance is provided to Management if a situation of illiquidity occurs.	FM	Quarterly
6.5.4			Withdrawals are recorded by the Scheme finance team who check key details on the request against source documentation. Withdrawals are confirmed by a peer reviewer who is independent of the input process.	FC	Half yearly
6.5.5			The finance team determine the pro-rata rate applicable to the Scheme by assessing the available cash and the value of withdrawal requests received.	FC	Annual
6.5.6			The total amount payable to each client is determined in accordance with the terms of the relevant withdrawal offer.	FC	Annual
6.5.7			Payments made through the registry system are reconciled to the pro-rata calculation model to ensure that cash payments do not exceed available cash reserves from the Scheme.	FC	Annual
6.6.1	Constitution s601FC(1)(k)	Processing withdrawals and switches Withdrawal requests must be processed in accordance with applicable requirements. At	A three-way reconciliation between the financial system, registry system and general ledger is performed by a Fund Accountant monthly. Variances identified in the reconciliation are investigated and resolved. The reconciliation is then subject to a review and signoff	FC	Half yearly

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		minimum:	process.		
6.6.2	s601GA(4) s601KA Offer document	<ul style="list-style-type: none"> valid and completed withdrawal request must be received; the scheme must be determined to be liquid; 	Withdrawals and switches that cannot be processed are held for processing until all required information has been received and verified.	FC	Half yearly
6.6.3		<ul style="list-style-type: none"> withdrawals must be processed at the correct price and in a timely manner; withdrawal proceeds must be distributed in a timely manner; and 	Non-electronic switches and redemptions are entered into the Registry System by an Administrator who will check key details on the request against source documentation. Withdrawal and switch transactions are confirmed by a second Administrator independent of the input process.	FC	Quarterly
6.6.4		<ul style="list-style-type: none"> during periods of suspensions, the RE may seek relief from ASIC upon receiving an application from an investor for withdrawal on hardship grounds. 	System-defined approval limits in the Registry System enforce the requirement for withdrawals greater than the approved limit to be stopped without payment and additional approval of the RE Board is required in order to effect clearance..	FC	Half yearly
6.7.1	Constitution s601FC(1)(k) Offer document	Payment of withdrawal proceeds Withdrawals proceeds must be correct and paid to the correct person within the timeframes set out in the Constitution and	Payments for redemptions that have been processed and confirmed are automatically processed by the registry system. Direct deposits to client's pre-nominated bank accounts are automatically processed by EFT and cheques are automatically printed.	FC	Half yearly

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6.7.2		offer documents. Deductions from withdrawals proceeds must be in accordance with the Constitution and offer documents	Confirmation letters and cheques are automatically generated together, and a cheque printing report is generated which is reconciled to the total number of cheques physically printed.	FC	Half yearly
6.7.3			Reconciliation between the registry system and the closing bank account balance is completed monthly. Reconciliations are subject to peer review. Unreconciled items are investigated, followed up and cleared.	FC	Half yearly
6.7.4			The registry system has an inbuilt function that prevents the number of redeeming units from exceeding the number of units held by the Member.	Head of GAM IT	Yearly
6.8.1	Constitution	Rounding Any rounding provisions of the Constitution must be followed (where applicable).	The system that manages payments controls rounding calculations. System developments and changes that affect payments are made with regard to rounding requirements.	Head of GAM IT	Yearly
Section 7: Investment and borrowing					
7.1.1		Power	The Constitution is checked to confirm that the Scheme can undertake borrowing.	FM	Yearly

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7.1.2	Constitution s601GA(1)(b)	Borrowings must be undertaken in accordance with the Constitution and as disclosed in Offer Documents.	Borrowing guidelines and restrictions are in place for the Schemes which undertake borrowing (excluding those that only use short term overdraft facilities) and in accordance with the Offer Document.	FM	Yearly
7.1.3			The RE Board approves all proposals to borrow through the annual Scheme strategy review process.	Company Secretary	Half yearly
7.1.4			All borrowings form part of the financial records of the Scheme.	FC	Monthly
7.2.1	Constitution s601FC s601GA(1)(b),	Compliance The investment or borrowing must comply with the Constitution and the limitations disclosed in the offer document.	Service providers utilised for borrowing activities are subject to review to ensure they exercise their contractual functions appropriately. The results of the review are reported to the RE Board.	Treasury	Monthly
7.2.2	AFSL RG 45		Borrowing guidelines and limitations are in place for Scheme borrowing activity, and reporting is provided on those activities to the Capital Management Committee and RE Board (quarterly). The Executive Manager, Treasury monitors the borrowing positions daily, and provides weekly reports to the CFO as part of the peer review process.	Treasury	Monthly

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7.2.3			<p>Borrowings require at a minimum:</p> <ul style="list-style-type: none"> • Preparation and review of reports on positions for the Scheme • All borrowing positions are reported to the RE Board quarterly (or as the RE Board so determines) <p>Where covenants apply, these are monitored and reported in accordance with Management policy.</p>	Treasury FC FM	Monthly
7.3.1	Constitution	<p>Derivatives</p> <p>Derivative exposures must be monitored to ensure at a minimum:</p> <ul style="list-style-type: none"> • Compliance with the Constitution and offer Document, and • Risks identified in Offer Documentation are managed consistently with disclosures. 	All derivatives exposures of the Scheme are monitored each business day.	Treasury	Monthly
7.3.2	Offer Documents		Treasury exposure reports are reviewed weekly by finance personnel that are independent of the team responsible for providing exposures reporting.	Treasury and CFO	Monthly
7.3.3			Scenario and stress testing is undertaken at least half yearly on a rolling basis to test all exposures and positions.	Treasury	Yearly
<p>Section 8: Income - calculation, payment and reinvestment</p>					

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8.1.1	Constitution s601FC(1)(b) s601FC(1)(k) Offer document	Calculation Scheme income and distributions must be calculated and made properly.	Distributions are calculated as a per unit rate or as otherwise required by the Constitution or Offer Document.	FM FC	Quarterly
8.1.2			A distribution template is used to calculate distributions. This template is reviewed during the distribution planning process by the Statutory Reporting and the internal tax team. Input from the external tax advisor is obtained as required.	FC and Executive Manager Taxation	Annual
8.1.3			The final distribution pack for each fund is reviewed by either the internal tax team or an external tax advisor prior to the release of the tax and distribution information.	CFO	Annual
8.1.4			A senior member of the Statutory Reporting team will review the distribution pack for each fund prior to the payment of distributions.	CFO	Annual
8.2.1	Constitution s601FC(1)(b) s601FC(1)(k)	Distribution payments and income reinvestments Distribution payments and income reinvestments must be made in accordance with the Constitution or any Offer Document	Distributions are paid to Members in accordance with the Constitution, Offer Document and/or instructions received from each Member. This may include reinvestment in accordance with the Constitution and any Offer Document.	FC	Half yearly

8.2.2	Offer document	or per instructions.	Payments for distribution are automatically processed by the registry system for EFT payment instructions and cheques are printed for manual payment instructions.	FC	Annual
8.2.3			Distribution statements are automatically generated from the registry system and are subject to a sign-off process that takes regard of required content.	FC	Annual
Section 9: Offer Documents and Advertising					
9.1.1	s1013C s1013D s1013DA, s1013E	Offer Documents Content of offer documents must comply with the Act and ASIC Policy, in particular including information a person would reasonably require for the purpose of making	All Offer Documents are subject to a due diligence process. The due diligence process ensures that all advertising and Offer Documents comply with relevant laws, contain all material information and do not contain any misleading statements or prohibited statements.	FM	Half Yearly
9.1.2	s1013F s1013G s1013 s1013L s1013M	a decision, as a retail client, whether to acquire the financial product	For Offer Documents, the due diligence program of the RE is implemented. At a minimum: <ul style="list-style-type: none"> • proper verification of advertisements and Offer Documents is conducted • subject matter experts' signoff is obtained as necessary and • due diligence records are properly maintained 	Head of RM&C	Half Yearly

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9.1.3			The RE Board has appointed the Due Diligence Committee to review and recommend to it Offer Documents, which the RE Board approves.	Company Secretary	Yearly
9.1.4			Due diligence records are retained for each Offer Document for seven (7) years.	FM	Yearly
9.1.5			All Offer Documents are subject to an ongoing Management watching brief to ensuring that all disclosures are current.	FM	Yearly
9.1.6	s1014A	Supplementary & Replacement Offer Documents Supplementary or replacement Offer Documents must be produced and distributed in accordance with requirements of the Act	Offer documents are subject to an ongoing Management watching brief to ensure that they do not become misleading or deceptive, out of date, omit information they are required to contain or otherwise do not meet the requirements of the Act.	FM	Half yearly
9.1.7			Supplementary or replacement Offer Documents are issued in accordance with the requirements of the Act.	Legal	Half yearly
9.1.8			For Offer Documents, the due diligence program of the RE is implemented. At a minimum:	Head of RM&C	Half Yearly
			<ul style="list-style-type: none"> • proper verification of advertisements and Offer Documents is conducted • subject matter experts' signoff is obtained as 		

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			necessary and		
9.1.9			<ul style="list-style-type: none"> due diligence records are properly maintained. <p>The RE Board has appointed the Due Diligence Committee to review and recommend to it Offer Documents, which it will approve.</p>	Company Secretary	Yearly
9.2.1	s1012B CO 02/262	Provision of offer documents Offer documents must be provided to clients at or prior to the offer to issue or arrange the issue of interests in a scheme. In the case of switching, the RE must reasonably believe the Member received the relevant offer document prior to the switching taking place and they must be provided it free of charge on request.	A policy is in place for ongoing disclosure, and ensures that Offer Documents are provided as required by the Act, namely prior to issue of units.	Legal, FM	Yearly
9.2.2			Processes are in place to ensure applications are received from the current Offer Document. If an application is not received from the current Offer Document, the applicant is provided with a copy of the most up-to-date Offer document and is informed that they have one month in which they can withdraw funds.	FC	Yearly
9.3.1	S949A s1018A s1041E s1041H	Advertising and promotional material Content of advertising and promotional material must comply with the Act and ASIC Policy, in particular: <ul style="list-style-type: none"> identifies the RE and makes 	All advertising and promotional material must go through the Marketing approval sign-off process as described in the Guidelines for Obtaining Approval for Marketing Material (sign-offs are obtained from stakeholders as per the guidelines) and completed prior to release or	Legal, FM and Head of RM&C	Yearly

	RG 53 RG 170	<p>reference to the Offer Document;</p> <ul style="list-style-type: none"> contains all necessary disclaimers and general advice warnings; presentation of past performance to retail clients must comply with RG 53 (e.g. standardised presentation and calculation, undue prominence to past performance); there must be reasonable grounds for prospective financial information; and is not false or misleading or deceptive. 	publication.		
Section 10: Communications to Scheme Members					
10.1.1	Part 2M.3 s1017D	Scheme Members	Statements are automatically generated by the registry system, and statements are printed and sample checked to the registry system.	FC	Half yearly
10.1.2		Communications with scheme Members required by the Act (e.g. financial statements, periodic statements & requests for additional information):	Content of periodic statements is subject to a sign-off process that takes regard of the legally required content.	FM, FC and Legal	Yearly

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10.1.3	Offer document	<ul style="list-style-type: none"> must be sent or made available on time (see "Adequacy of records" and "Unit price calculation and issue and withdrawal procedures"); and must meet the requirements of the Act and the Constitution (see "Adequacy of records" and "Unit price calculation and issue and withdrawal procedures"). 	<p>The annual financial report (including the financial statements) is subject to relevant review and sign-off procedures.</p> <p>Reports are made available in electronic and hardcopy form).</p>	FC, CFO	Yearly
10.1.4			Requests from Members to be sent annual financial statements are entered into the Registry System.	Head of Investor Relations	Yearly
10.1.5			Financial Statements are mailed to Members using data from the registry system or provided electronically. Where a mail-out occurs, it is sample checked to the registry system.	FC	Yearly
10.2.1	s1017F	<p>Transaction confirmations</p> <p>Transaction confirmations must be provided for all transactions excluding regular savings, as soon as reasonably practicable. The confirmation must contain certain information about the transaction (including the date and description of the transaction).</p>	Processes are in place to ensure that confirmations of transactions are sent to Members as required.	Head of Investor Relations	Half yearly
10.2.2			Content of confirmation letters is subject to a sign-off process that takes regard of the legally required content.	Legal	Half yearly
10.3.1		<p>Verbal communications with Members</p> <p>All necessary warnings and disclaimers</p>	Processes are in place to ensure all necessary warnings and disclaimers are given to retail investors.	Legal	Yearly

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10.3.2	s941D s949A	(e.g. general advice disclaimer, Financial Services Guides or where a client wishes to receive general advice immediately, details of remuneration and associations) must be given to Members before or during verbal communications.	Specified personnel are RG146 compliant as required by relevant laws and ASIC Policy.	Head of RM&C	Half yearly
10.3.3	RG146		The on-going training requirements for these RG146 personnel are monitored and recorded to ensure key personnel maintain their on-going training requirements with regards to RG146. Training plans are in place for all personnel designated for RG146 purposes, and reports are provided quarterly as to adherence to training obligations.	FM, Head of RM&C	Quarterly
Section 11: Meetings of Scheme Members					
11.1.1	Constitution s252A s252B	Calling scheme meetings Scheme meetings must be called when the RE determines or where Members with at least 5% of votes or at least 100 Members who are entitled to vote on the resolution request such a meeting to be held.	Meetings are called in accordance with the Act and the Constitution.	Company Secretary	Yearly
11.1.2			Member meeting requisitions are reviewed against Act and Constitution requirements.	Company Secretary	Yearly
11.2.1	Constitution s252F	Notice of meetings Sufficient notice of meeting must be given (21 clear days plus time for delivery of documentation unless the Constitution	All notices of Member meetings are reviewed against the Act and Constitution requirements to ensure that proper notice is given.	Company Secretary	Check for each meeting

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		specifies a longer period).			
11.3.1	Constitution s252G s252H s252J	Meeting documentation Notice of meeting, resolutions and associated documentation must meet the requirements of the Constitution and the Act and such documentation must be distributed to each Member of the scheme and all other relevant parties.	Management and legal sign-off is obtained on all materials prepared for meetings of Members.	Legal	Check for each meeting
11.3.2			Meeting materials and proposed distribution methodology are reviewed against Act and Constitution requirements with advice sought from Legal as required.	Company Secretary	Check for each meeting
11.3.3			A review process is implemented to ensure that meeting materials are given to each Member of the Scheme, the RE and any other party as required.		Check for each meeting
11.4.1	Constitution Part 2G.4, Divisions 4 to 6	Conduct of meeting Scheme meetings must be held at a reasonable time and place, meet the quorum requirements (two Members unless otherwise specified in the Constitution), and have a validly appointed chair. Proxies must be validly appointed and voting must be conducted properly.	The appropriate time, venue and manner in which the meeting is to be held is determined prior to notification being sent to Members. Legal advice is sought as required. Proxy votes are checked by the Registrar prior to the meeting to confirm that valid appointment has occurred and the vote is executable at the meeting as directed by the Member.	Company Secretary	Check for each meeting
11.5.1	s253M	Minutes Complete minutes of scheme meetings and resolutions of such meetings must be kept, signed and recorded in the RE's minute	Adequate minutes are prepared and signed. Minutes and records of resolutions are retained by the Company Secretary.	Company Secretary	Check for each meeting

		books within one month.			
11.6.1	Constitution, s224 s253E	Voting by Responsible Entity and associates The RE and its associates must not vote units held by them if the Act, Constitution or the law prohibits such a vote being cast.	A review of voting against these requirements and the Constitution is conducted.	Legal	Prior to meeting as practicable
11.6.2			A review of RE unit holdings against Act voting prohibitions is conducted prior to notice of the meeting being finalised.	Legal	Prior to meeting as practicable
11.6.3			All proxy votes are checked to exclude those votes cast which are not entitled to vote on the resolution.	Head of RM&C	Prior to meeting as practicable
Section 12: Expenses and Fees					
12.1.1	Constitution s601GA(2)	Calculation and payment Fees must be calculated and paid in accordance with the Constitution and Offer Document. At a minimum:	Fees are set in accordance with the Constitution and Offer Document at the time of Scheme set up and is reviewed on an ongoing basis.	FC	Half yearly
12.1.2	Offer document	<ul style="list-style-type: none"> • fee calculation must be accurate; and • fee payment must comply with the relevant undertakings 	<p>The process of claiming fees and expenses by the RE is centralised with the Finance Controller. Calculations are reviewed by a person independent of the preparer.</p> <p>This includes.</p> <ul style="list-style-type: none"> • system automated calculations for management 	FC	Half yearly

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			<p>fees which are set up by relevant personnel in accordance with the Constitution and Offer Documents.</p> <ul style="list-style-type: none"> • Reconciliations between the financial system and the accrual spreadsheet to ensure management and performance fees are accurately calculated; and • Investigating and resolving any discrepancies 		
12.2.1			<p>Before the fees and expenses are processed for payment out of the Schemes, Finance reconciles their figures to the invoices.</p> <p>Discrepancies are investigated and resolved. This is then reviewed and approved by a senior Member of the team prior to payment.</p>	FC	Half yearly
12.3.1	<p>Constitution s601FC(1)(d) s601GA(2) CO 03/217 Offer document</p>	<p>Equal treatment</p> <p>Fee arrangements must result in scheme Members being treated equally, and different classes fairly subject to exceptions permitted by Class Order.</p>	<p>Rebate fees are calculated and posted by an accountant. These are reviewed before being released.</p>	FC	Yearly
			<p>Rebate fees are calculated both automatically within accounting systems and also manually by the Fund Accountant and subject to peer review to ensure the rebate is in accordance with the rebate agreement.</p>	FC	Yearly

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12.4.1	Constitution S601GA(2) Offer documents	<p>Expenses</p> <p>Only expenses permitted by the Constitution and in the proper performance of the RE's duties must be reimbursed.</p>	<p>The process of claiming expenses by the RE is centralised within the fund Finance team. Calculations are reviewed by a person independent of the preparer.</p> <p>This includes.</p> <ul style="list-style-type: none"> • Checking expenses are in accordance with Constitution and Offer Documents. • Reconciliation between the amount of the expenses that are being recovered by the RE to the invoices issued to the Scheme for the expense recovery; and • Investigating and resolving any discrepancies. 	FC	Half yearly
12.4.2			<p>Before the fees and expenses are processed for payment out of the Schemes, Finance reconciles their figures to the invoices.</p> <p>Discrepancies are investigated and resolved. This is then reviewed and approved by a senior Member of the team prior to payment.</p>	FC	Half yearly
12.4.3			<p>Claims for abnormal expense recovery are reviewed and approved prior to payment.</p>	FC	Half yearly

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12.5.1	Constitution s601FC(1)(k) offer document	Expenses of more than one scheme	The process of claiming fees and expenses by the RE is centralised within the CFSGAM Finance Division. Calculations are reviewed by a person independent of the preparer.	CFO	Half yearly
12.5.2		Expenses relating to more than one scheme must be attributed to the relevant scheme as set out in the Constitution and offer document and if not set out, then fairly.	Prior to fees and expenses being processed for payment out of the Scheme, the Fund Accountant will perform reconciliation to the General Ledger and any invoices. Discrepancies are investigated and resolved. This is subject to a peer review and signoff prior to payment.	FC	Half yearly
12.6.1	Constitution Offer Document	Transaction Fees	Transaction fees are formally approved by the RE Board prior to being established in Scheme financial system, and prior to being applied to unit prices.	FC	Yearly
		Transaction fees allowable under the Constitution and Offer Document must be authorised for payment where the fee is for payment in respect of sourcing, negotiating and executing a transaction on behalf of the Fund for the benefit of scheme Members.	Where a transaction fee (acquisition or divestment) is incurred (for example as a sourcing fee), the maximum amount chargeable is confirmed from the Offer Document and Constitution prior to it being taken into the accounts of the Scheme.	FC and Legal	As incurred
Section 13: Conduct of Business and Conflicts of Interest					
13.1.1	s1043A	Insider trading	Personnel are notified at least yearly of their obligation to comply with the Insider Trading Policy. Policies in relation to insider trading are available to all	Head of RM&C	Half yearly

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		the information or cause the information to be communicated to another person.	personnel and directors.		
13.1.2			Authorisation or notification of personal trades by relevant personnel is required before the transactions take place. This authorisation will occur on a form designed for this purpose and in accordance with the instructions on this form. Personal account trading is subject to monitoring.	Head of RM&C	Half yearly
13.1.3			Personnel are notified at least half yearly of their obligation to observe and comply with the Personal Trading Policy. The Policy and authorisation forms are available to all personnel through the Intranet or from RM&C.	Head of RM&C	Half yearly
13.2.1	s601FC(1)(e) s601FD(1)(d) s601FD(1)(e) s601FE(1)	Improper use of information The RE must not make use of information acquired through being the RE in order to gain an improper advantage for itself or another person or cause detriment to the scheme Members	Authorisation or notification of personal trades by relevant personnel is required before the transactions take place. This authorisation will occur on a form designed for this purpose and in accordance with the instructions on this form.	Head of RM&C	Yearly
13.2.2			Directors disclose any transactions in Schemes issued by the RE at the next RE Board meeting or in writing to the other directors. Directors are reminded of their obligations in relation to Conflicts of Interest at least half yearly.	Head of RM&C	Yearly

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13.3.1	s601FG	Acquisition of interests by Responsible Entity Investments by the RE, its affiliates or directors in the scheme must be disclosed in order to manage any potential or actual conflict of interest and investments must be made in accordance with the Act.	Directors of the RE are required to disclose interests in the Scheme.	Company Secretary	Yearly
13.3.2			A specific agenda item is included in RE Board meetings and minuted as appropriate.	Company Secretary	Yearly
13.3.3			If necessary in an individual circumstance where the RE, its affiliates or directors own investments in the Scheme, the RE implements procedures considered necessary to manage any conflict of interest that may arise and to ensure compliance with the requirements of the Act.	Company Secretary	Yearly
13.3.4			The RE is required to disclose where it ceases to hold an interest in the Scheme at its next meeting, which is minuted in the same manner as holding or acquiring interests.	Company Secretary	Yearly
13.3.5			Where the RE purchases units or redeems units in a Scheme it receives the same price as any other Member that being the entry or exit price for the relevant date.	Company Secretary	Yearly
13.4.1	s601FC(1)(c) s912A(1)(aa)	Priority to client In the event of a conflict of interests between Members' interests and the RE interests,	Conflicts of interest are monitored and managed in accordance with the Conflicts of Interest Policy and the Conflicts of Interest register.	Head of RM&C	Half yearly

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	AFSL conditions	priority must be given to Members' interests.	The conflicts of interest register is reviewed yearly or as required.	Head of RM&C	Half yearly
			If necessary in an individual circumstance where the RE, its affiliates or directors own investments in the Scheme, the RE Board implements procedures to manage any conflict of interest that arise.	Head of RM&C	Yearly
13.5.1	s191 s192 s195	Conflicts of interest Adequate arrangements must be in place for the management of conflicts of interest	The conflicts of interest register is reviewed yearly or as required.	Head of RM&C	Yearly
13.5.2	s912A(1)(aa) RG 181 AFSL conditions		Conflicts of interest are monitored and managed in accordance with the Conflicts of Interest Policy and the Conflicts of Interest register.	Head of RM&C	Half yearly
13.5.3			Any issues pertaining to potential or actual conflicts of interest are notified to the RE Board.	Head of RM &C	Yearly
Section 14: Ongoing Disclosure and filings					
14.2.1	s111AFA s675 s1017B	Continuous disclosure Ongoing disclosure requirements of the Act must be met.	Material changes and significant events (internal and external) are monitored to identify matters that require disclosure.	Head of RM&C	Half yearly
14.2.2			Where necessary, matters arising are referred to Legal Counsel for advice.	FM, Head of RM&C	Half yearly

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14.2.3			Where any such event occurs, notification to Members is subject to review and sign-off from relevant business areas in accordance with document sign-off processes.	Legal	Half yearly
14.3.1	Part 2M.3 Australian	Reports All yearly (and half yearly, if required) financial reports for the RE must be prepared, lodged with ASIC, and distributed as required under the Act	The financial statements for the RE are prepared in accordance with the Act and are audited as required by the Act.	CFO	Half yearly
14.3.2	Accounting Standards RG 68		The financial statements lodged with ASIC are subject to a due diligence and verification process prior to release. The RE Board formally approves the yearly and half yearly financial statements prior to lodgement with ASIC. Records of lodgement are retained.	Due Diligence Committee	Half yearly
14.4.1	s601EC	ARSNs/ABNs All scheme related documents lodged with ASIC must set out the scheme's ARSN or ABN.	Documents are reviewed prior to release to ensure that all documents to be lodged with ASIC include the Scheme's ARSN or ABN.	Head of RM&C	Half yearly
14.4.2			Documents are reviewed prior to release to ensure that all documents to be lodged with ASIC include the Scheme's ARSN or ABN. This forms part of the financial statements sign-off process	Head of RM&C	Half yearly
Section 15: Plan and Constitution					

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15.1.1	s601GC CO 09/552	Amendments to Constitution Amendments to the Constitution must be approved by Scheme Members where required or by the RE if it reasonably considers the change will not adversely affect Members' rights	Amendments to the Constitution which may adversely affect Member's rights are approved by a meeting of Scheme Members.	Legal	Half yearly
15.1.2			Amendments to the Constitution which do not adversely affect Member's rights are approved by the RE Board.	Company Secretary	Half yearly
15.1.3			If such a recommendation is not to be undertaken by reference to a unitholder meeting, a documented rationale for that decision is held as part of the Scheme records, including relevant advice (and any relief granted by ASIC) for that action.	Legal and Fund Manager	Half yearly
15.2.1	s601GA s601HA RG 132 RG 134	Compliance with law Each Constitution and Compliance Plan must comply with the Act and ASIC Policy.	Each Constitution and Compliance Plan is reviewed by Legal Counsel prior to execution.	Legal	Yearly
15.2.2			The Compliance Plan is reviewed yearly and an annual legal sign-off is obtained to ensure it continues to comply with the Act and ASIC Policy.	Legal	Yearly
15.2.3			The regulatory environment in which the Scheme operates as well as any changes to the Scheme, the Act or ASIC Policy is monitored on an ongoing basis.	Head of RM&C	Yearly

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15.2.4			The ongoing adequacy of the Plan is considered and any matters requiring consideration for amendment, removal or update form the basis of proposed amendments to the Compliance Committee and RE Board.	Head of RM&C	Yearly
15.3.1	s601GC(2) s601HE(3)	Lodgement with ASIC Amendments to the Constitution and the Plan must be lodged with ASIC. The amendments to the constitution cannot take effect until the copy has been lodged. For the Plan, the copy must be lodged within 14 days after the amendments have been made.	The RE Board approves any Constitution amendments prior to lodgement with ASIC. Once approved, any amendments to the Constitution are lodged with ASIC in the form and time stipulated by ASIC. Records of lodgement are retained.	Company Secretary	Half yearly
15.3.2			Plan amendments are provided to the Compliance Committee for review and recommendation to the RE Board for approval.	Head of RM&C	Half yearly
15.3.2			The RE Board approves any Plan amendments prior to lodgement with ASIC. Once approved, amendments to the Plan are lodged with ASIC within the required time frames. Records of lodgement are retained.	Company Secretary	Half yearly
Section 16: Retirement and Removal of the Responsible Entity					
16.1.1	Part 5C.2, Division 2	Retirement or removal Any retirement or removal of the RE must take place only in accordance with the Act and the Constitution and ASIC must be	Issues in relation to the retirement and/or replacement of the RE are considered by Management and the RE Board on a case by case basis.	FM, Legal	Prior to retirement or removal as practicable
16.1.2			Retirement or removal procedures are reviewed against the Act and Constitution requirements and ASIC	Company Secretary	Prior to retirement or removal as

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		notified.	notification records are maintained by the Company Secretary.		practicable
16.1.3			The RE's decision in relation to the retirement or removal of the RE is undertaken with a documented plan in place at the time of retirement or removal of the RE to ensure that the requirements of the Constitution and the Act are met.	Legal	Prior to retirement or removal as practicable
16.2.1	s601FL(2)	Replacement of Responsible Entity The replacement RE must consent in writing to its appointment and executes all appropriate documents.	The existing RE and the replacement RE both provide written consent to the change to RE for the Scheme.	Company Secretary	Prior to retirement or removal as practicable
16.2.2			Existing contractual arrangements, Constitution and Act requirements are reviewed and a checklist is completed for execution of all relevant requirements.	Legal	Prior to retirement or removal as practicable
16.3.1	s601FL(2)	Transition The retiring or removed RE: <ul style="list-style-type: none"> • must hand over records in its possession; and • shall give reasonable assistance to 	Existing contractual arrangements, Constitution and Act requirements are reviewed to facilitate novation of existing arrangements (where applicable) and the replacement RE is informed of all obligations it is assuming.	Legal	Prior to retirement or removal as practicable

16.3.2		facilitate the change to the replacement RE	The outgoing RE liaises with the replacement RE to develop and implement a documented plan of action, which includes the handover of Scheme records.	Legal	Prior to retirement or removal as practicable
Section 17: Dispute Resolution					
17.1.1	Constitution s912A(1)(g) s912A(2)(a) RG 165	Internal dispute handling procedure An internal dispute handling procedure must be in place which meets the requirements of the Act. At a minimum: <ul style="list-style-type: none"> disputes are acknowledged and responded to in the timeframes required by ASIC policy disputes must receive proper consideration; and the RE must act in good faith to deal with disputes. 	All disputes, either actual or suspected, are notified to relevant dispute management personnel.	Head of Investor Relations	Monthly
17.1.2			Specified personnel are designated to deal with complaints from Members.	Head of Investor Relations	Monthly
17.1.3			All enquiries and disputes are properly considered and dealt with promptly in accordance with the Complaints Handling policy and procedures, and are recorded in a register.	Head of Investor Relations	Monthly
17.1.4			A summary of disputes received and resolved is provided on a monthly basis to RM&C.	Head of Investor	Monthly

				Relations	
17.1.5			The actions taken to address disputes are monitored by RM&C. Where the cause(s) of disputes are, in the opinion of RM&C, systemic they are brought to the attention of the Compliance Committee and the RE Board.	Head of RM&C	Quarterly
17.2.1	s912A(1)(g) s912A(2)(a) RG 165	External complaints handling The RE must be a Member of an approved external dispute resolution scheme as the Act requires.	A review of the Membership of an approved external dispute resolution scheme is undertaken to ensure that Membership is current and that the dispute resolution scheme remains an approved scheme by ASIC.	Head of RM&C	Yearly
17.2.2			If the external dispute resolution scheme ceases to be an approved scheme, the RE takes necessary action to change its external dispute resolution scheme	Head of RM&C	Yearly
Section 18: Scheme Wind-up, Termination and Deregistration					
18.1.1	Constitution Part 5C.9	Wind Up The winding up of the Scheme must be in accordance with the Act and the Constitution	Issues in relation to the wind-up of the Scheme are considered by Management and appropriate recommendations are made to the RE Board.	FM	Prior to termination as practicable
18.1.2			A review is conducted of the termination process against	Legal	Prior to termination as

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			Act and Constitution requirements prior to termination		practicable
18.1.3			Termination of a Scheme is undertaken with a documented plan in place at the time of wind-up to ensure that the requirements of the Constitution and the Act are met.	Legal	Prior to termination as practicable
18.2.1	Part 5C.10	Deregistration The Scheme must be deregistered in accordance with the Act.	Legal counsel provides advice as to the requirements for deregistration.	Legal	Prior to termination
18.2.2			An application for deregistration is completed and lodged with ASIC in the required form.	Head of RM&C	Prior to termination
18.2.3			Deregistration completion is monitored to finalise the termination of the Scheme, and commence its record retention period from cessation.	Head of RM&C	Prior to termination
18.3.1	Constitution	Notification Scheme Members and ASIC must be notified of termination in accordance with the Constitution.	Review and sign-off on all communication to Members is undertaken prior to being sent to Members, including confirmation that terms, notifications and expected timing are in accordance with the Constitution and the law.	Legal	Prior to termination
18.3.2			Notification to ASIC is subject to a review and sign-off process to ensure all required information is provided in the form specified by the Act and ASIC Policy.	Head of RM&C	Prior to termination
18.4.1		Realisation of scheme property	A review of the realisation methodology against Act and	FC, Legal	Prior to finalising

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18.4.2	Constitution	Scheme property must be realised in accordance with the Act and the Constitution	Constitution requirements is conducted.		wind up
			Realisation of Scheme property is documented and held as part of the Scheme records	FM, FC	Prior to finalising winding up
18.5.1	Constitution	Distribution Proceeds are distributed to scheme Members in accordance with the Constitution.	Distribution of the realised value of Scheme property is undertaken in accordance with the Constitution and any requirements of the Act.	FC	Prior to distribution
18.5.2			Distribution of Scheme proceeds is conducted in a controlled environment in accordance with relevant procedures.	FC	Prior to distribution
18.5.3			Distribution statements are issued to Members with the distribution proceeds upon wind-up of the Scheme.	FC	Upon wind-up
18.5.4	S601NG	Unclaimed Monies Unclaimed money or other property that was part of the scheme property must, as soon as practicable, be paid or transferred to ASIC to be dealt with under Part 9.7.	In the event of any unclaimed proceeds, those monies are transferred as required under the Act to ASIC including relevant details of the Member to whom those monies are attributable as soon as practicable.	CFO	Half yearly
18.6.1	s601NE(3)	Issue of interests during winding up Applications for units must be refused after termination.	The RE does not accept applications for units, including distribution re-investments, in the Scheme during the winding up period.	FM, FC	Half yearly

18.7.1	Constitution	Withdrawal of interests during winding up	Except for hardship circumstances and in accordance with the Act and any relief sought, the RE must not process any withdrawals/ redemption of units in the Scheme during the winding up period.	Legal	Half yearly
18.7.2		Withdrawal/Redemption of units during wind up period must be dealt with in accordance with the Constitution.	The RE may process transfers received during winding up which meet the requirements of the Constitution.	FC	Half yearly
Section 19: AFS Licence obligations					
19.1.1	s911A	AFS licence	A review of the existing licence authorisations is undertaken to ensure they are appropriate for the activities and types of Schemes issued by the RE.	Head of RM&C	Yearly
19.1.2		The RE must hold any necessary licences under the Act and those licences must cover all necessary activities for the financial services provided.	Amendments or cessations are approved by the RE Board prior to lodgement for variation with ASIC.	Head of RM&C	As required
19.2.1	s911A	Licence current	A review is undertaken to confirm that ASIC has not taken action to cancel or revoke the licence and the license is still current.	Head of RM&C	Yearly
19.3.1	s912A(1)(b)	Licence conditions	RM&C monitors the licence and confirms that the RE is acting within the scope of its licence.	Head of RM&C	Monthly
19.3.2		The RE must comply with the conditions of its licence (other than those dealt with elsewhere in this plan), including financial, key person and any other specified	A review of the existing licence authorisations is undertaken to ensure they are appropriate for the activities and types of Schemes issued by the RE	Head of RM&C	Yearly

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		requirements as stipulated in the licence issued by ASIC.			
19.4.1	s916A s916F	Representatives - training The RE must ensure that its representatives: <ul style="list-style-type: none"> • have adequate training and supervision; • are adequately trained, and are competent to provide the financial services specified in the RE's licence; and • satisfy RG 146 where providing advice to retail clients. 	Training plans are put in place for representatives yearly, and records evidencing completion of training requirements are maintained relevant to their duties and the obligations of the AFSL and this Plan.	Head of RM&C	Half yearly
19.4.2	s912A RG 146		The Training Policy is in place to give effect to the accreditation process for representatives and their ongoing training requirements for both AFSL and RG146 purposes are complied with.	Head of RM&C	Yearly
19.4.3			Representatives complete Group on-line compliance training. The completion of training is monitored through regular training reports sent to senior management.	Head of RM&C	Half Yearly
19.5.1	S912A(1)(h)	Risk Management The RE must have adequate risk management systems in place.	The RE operates an integrated risk management framework based on required Australian and/or International Standards (AS or ISO).	RM&C	Half yearly
19.5.2			RM&C is responsible for the implementation of the framework by Layer 1, including performing semi-annual risk profiling for the Scheme to identify, assess, mitigate and report on investment, operational, credit, counterparty, financial and asset risks.	FM	Half yearly

19.5.3			The Scheme provides information to Members on key risk factors from inception (in the Offer Document) and thereafter through the period Scheme reporting provided to Members.	FM	Quarterly
Section 20: ASIC Compliance Checks					
20.1.1	s912E	Assistance to ASIC The RE and its representatives must give such assistance to ASIC as reasonably requested in relation to whether the RE and its representatives are complying with the financial services laws and in relation to the performance of ASIC's other functions.	Personnel and representatives are informed of the requirement to assist ASIC with its compliance checks.	Head of RM&C	Prior to compliance check and during compliance check
20.1.2			Personnel are advised of their obligations prior to a surveillance visit.	Head of RM&C	Prior to compliance check
20.1.3			The co-operation of personnel and liaison with ASIC during a compliance check is monitored.	Head of RM&C	Prior to compliance check
20.1.4			Depending upon the nature of the ASIC surveillance visit a plan is implemented to effectively manage the communications process.	Head of RM&C	Prior to compliance check

Section 21: Related Party Transactions					
21.1.1	ss210 - 216 s601LC	Related parties The RE, or an entity that it controls or an agent of, or person engaged by, it, must not give a financial benefit to related parties out of the scheme property or where the benefit could endanger scheme property, unless the approval of Members is obtained or the giving of the benefit is otherwise exempt.	Related party agent appointments are only made where: <ul style="list-style-type: none"> the appointment is on arms length terms and conditions; and the appointee has the capacity to perform the relevant service(s). 	Head of RM&C, Legal	As required on appointment process.
21.1.2			The RE Board approves any contracts with related parties. Approval is granted where supported by recommendation and due diligence review process.	Company Secretary	Yearly
Section 22: Breach Reporting					
22.1.1	s912D RG78	Breaches The RE is required to have systems that identify, manage and report breaches of its licence and of the Act.	Breaches, whether actual or suspected, are notified to RM&C when identified by personnel. The compliance and risk incident management policy is available to all personnel.	Head of RM&C	Monthly
22.1.2			A compliance program is managed by RM&C on behalf of the RE which is in place to monitor compliance with the Schemes' adherence to this Plan and the AFS licence.	Head of RM&C	Monthly

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22.1.3			Breaches are managed and reported in accordance with the Compliance Incident Management policy, including the logging of issues to the incident management system and monthly follow ups on the action plans in place to address the issues.	Head of RM&C	Monthly
22.2.1	s912D RG 78	Reporting The RE must have controls in place to ensure reportable breaches are reported to ASIC as required under the Act and under the RE's licence.	Processes are in place to check that breaches are assessed to determine their nature and impact and whether any breach is significant and reportable to ASIC in accordance with the Act and ASIC Policy.	Head of RM&C	Monthly
Section 23: Outsourcing					
23.1.1	s912A(1) RG 104.36	Outsourcing The RE must ensure that appropriate measures are in place to manage the selection, appointment and supervision of all Service Providers.	The selection, appointment, monitoring and termination of agents and Service Providers is subject to due diligence reviews to execute applicable policy requirements, including: <ul style="list-style-type: none"> • skills, reputation and experience, • demonstrated existing and continuing capacity to carry out the functions required in compliance with relevant provisions of the Act, ASIC standards, the Constitution and this Plan. 	Head of Operations	Yearly or as appointment are being consider

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23.1.2			<p>The RE approves the appointment of any Service Provider (internal or external) and in doing so will consider:</p> <ul style="list-style-type: none"> • the selection process undertaken by the business area responsible for proposing use of the Service Provider; and • the performance measures embodied in the service agreement. 	Company Secretary	Yearly
23.1.3			All contracts with Service Providers are reviewed by Legal prior to approval by the RE and execution of the contract.	Legal	Yearly
23.1.4			All contracts with Service Providers contain minimum mechanisms for achieving compliance in accordance with policies set from time to time.	Legal	Yearly
23.1.5			All contracts with Service Providers include termination provisions.	Legal	Yearly
23.1.6			Service providers must monitor and report performance against the relevant administrative or service level agreement as detailed within the agreement.	Head of RM&C	Yearly

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23.2.1	s912A(1)	<p>Performance</p> <p>19.7 The duties of Service Providers must be monitored to ensure ongoing obligations are discharged appropriately and in accordance with the contractual obligations.</p>	Operational monitoring and reporting of the services provided are undertaken on a monthly basis to ensure discharge of obligations and appropriateness of actions taken on behalf of the RE.	RM&C	Quarterly
23.2.2			Key Service Providers are subject to monthly compliance monitoring, including due diligence review at contract expiration periods (prior to roll-over or discharge of providers).	Head of RM&C	Yearly

Part 6

Signing

This Plan was signed by the Board of Directors of Commonwealth Managed Investments Limited on 28 June 2010.

Richard HADDOCK
Chairman

Nancy MILNE
Director

James KROPP
Director

Grahame PETERSON
Director

Michael VENTER
Director

Part 7 Scheme Specific Provisions

Commonwealth Property Office Fund (CPOF) ARSN 086 029 736

Scheme description

CPOF is a listed, sector specific office trust with a mandate to invest in prime quality office buildings located in CBD and major suburban markets in Australia.

Application of clauses in the Master Plan

To the extent that provisions in the Master Plan are rendered inconsistent or inapplicable by provisions in this Part 7 Scheme Specific Plan, either directly or by inference, then the provision in this Part 7 will prevail and the relevant provision(s) in Parts 1 through 5 will be varied accordingly.

The definitions have the same meaning as those stated in the Master Plan.

Part 7 Scheme Specific Provisions					
No	Legal ref	Obligation	Key Controls	Responsible Person(s)	RM&C Monitoring Frequency
ASX Listing Rules and Corporate Governance Disclosure Principles					
1.1.1	LR 3	Continuous disclosure The RE of a listed scheme must immediately notify to the ASX any	As assessment of the materiality of information, transactions and any other matter that may become material is undertaken to determine if LR3 is	FM	Quarterly

		matter or information it becomes aware of that a reasonable person would expect to have a material effect on the price or value of the securities, unless an exception to the general rule is applicable.	applicable, including review and sig-off from Legal.		
1.1.2			Where a matter requires notification to ASX, the drafted notification is reviewed within the business, Legal, RM&C and by Directors prior to its release to ASX.	Head of Investor Comms	Ongoing
1.1.3			If a Director acquires or disposes of interests in the Scheme, disclosure to ASX is lodged within 5 days of the Director informing the RE Board.	Company Secretary	Quarterly
1.1.4			Lodgement of continuous disclosure notifications is completed by electronic notification.	Company Secretary	Ongoing
1.2.1	LR 4	<p>Periodic disclosure</p> <p>The RE must lodge with ASX periodic Scheme reports, specifically for:</p> <ul style="list-style-type: none"> • Annual financial statements (within not more than 60 days of the FY end); and • Half yearly financial statements (not more than 75 days after the period end) 	<p>Financial statements are prepared and signed off by the Fund Finance team, and externally audited.</p> <p>The financial reports are formally provided to the Board Audit Committee for acceptance, and approved by the RE Board.</p>	FC	Half yearly
1.2.2			Where the Scheme issues interim periodic reports (unaudited quarterly updates), the financial information is subject to a formal review and signoff process prior to lodgement with ASX under LR3.	FC	Half yearly (September, March periodic reports)

1.2.3			A report is prepared for all holders of ordinary and preference securities, and is checked to ensure it captures the specific requirements of section 4.10 (see Additional Requirements section below for specific inclusions).	Head of RM&C	Yearly
1.2.4			A due diligence process is applied for the issuing of annual reports and includes review and sign-off by subject matter experts on its content and adherence to the requirements of ASX Listing Rules, the Act and any other applicable requirements from time to time. The annual report is approved by the RE prior to lodgement.	Head of RM&C	Yearly
1.2.5			Lodgement of periodic disclosure notifications is completed by electronic notification.	Company Secretary	Half yearly
1.3.1	LR 7	Changes in capital and new issues If the Scheme proposes to undertake a capital reconstruction or buy-back it must: <ul style="list-style-type: none"> consult with ASX; and 	When the Scheme is aware of the likely change or issuing of capital, its Legal advisor will consult with ASX as to the nature, type of scope of that change prior to any communication to market or Members of the potential change. Documented evidence of such discussions is retained as part of the Scheme records (and may be in any of	FM Legal	Half yearly

		<ul style="list-style-type: none"> have the approval of Members in certain circumstances 	the approved forms, including electronic record).		
1.3.2			If the Scheme is intending to issue or agree to issue securities in excess of 15% of the amount of securities on issue in any 12 month period it will seek the prior approval of unitholders through a Meeting of Members (unless it has been assessed as having an applicable exclusion, determined by Legal).	FM Head of Investor Comms	Half yearly (or as required in the event of a transaction)
1.3.3	LR 7	<p>Issue of new units – pricing</p> <p>The RE must offer new units in the form and using the price method required at LR7.3, including:</p> <ul style="list-style-type: none"> must specify the maximum number of new securities to be issued must confirm the date the securities will be issued; and must specify the issue price of the securities. 	<p>New securities issues are calculated by the Fund Accountant, using a formula of either:</p> <ol style="list-style-type: none"> a fixed price for the securities (price per unit), or a minimum price, where the price is at least 80% of the value of the average sell price of the securities for the 5 days prior to the record date before the issue is made. <p>Calculations of the maximum securities to be issued, the price and allocation to unitholders (pro-rata entitlement) is subject to a review and sign-off process that is independent of the preparer, and may also be subject to an audit review and sign-off for the securities issue, and is provided for confirmation via ASX prior to</p>	FM FC Legal RM&C	Half yearly (or as required for an issue of securities being prepared and offered)

			market release.		
1.4.1	LR 8	Registers The RE must maintain a register of Members that is compliant to the requirements of the ASX.	The RE has a registry in place to record the details of Members, provided to it under contract with an external service provider.	Head of Operations	Yearly
1.4.2			The registry issues holding statements to Members for transfers and other corporate actions, and annual statements.	Head of Investor Comms	Half yearly
1.4.3			The registry service provider is monitored in accordance with Part 5, Section 23 of the Master Plan.	Head of RM&C	Half yearly
1.5.1	LR 10	Transactions with persons in a position of influence The RE must obtain Member approval for transactions that are with a designated “person in a position of influence” unless it obtains a specific exemption from ASX for this Rule.	All related party transactions are subject to a detailed procedure, which may include external probity engagement, liaison with ASX prior to commencement and compliance oversight for the duration of the transaction (refer also to Part 5, Section 21 of the Master Plan).	Head of RM&C	As required and at the time of transactional activity.
1.5.2			The RE Board must approve all transactions that involve a related party or any other person considered to be in a position of influence.	Company Secretary	
1.6.1	LR11	Significant transactions If the Scheme proposes to make a substantial change to the nature or	A procedure for assessing the significance of transactions and determining the requirements of the Listing Rules and any associated requirements of the	FM Legal	As required at the time of transaction

		scale of its activities, it must notify ASX as soon as practicable and at least prior to making the change.	Act are applied at the time a scheme considers such a transaction.		
1.7.1	LR12	Ongoing requirements The scheme must maintain adequate operations, including financial, liquidity, spread and structure, to continue to be quoted on the market.	Periodic cash flow, balance sheet and liquidity position statements are produced (solvency testing) to ensure that the Scheme is maintaining its required financial condition for listing purposes.	FC FM	Quarterly
1.7.2			The structure and operations of the Scheme is reviewed at least once each reporting period by the RE Board.	FM	Yearly
1.7.3			Confirmation is sought that, when the Scheme is trading as part of the S&P All Ordinaries at the commencement of its financial year, the RE Board has an audit committee in place.	Company Secretary	Yearly
1.7.4			Confirmation is sought that, when the Scheme becomes or is part of the ASX/S&P 300, it is including in its reporting those sections of the ASX Corporate Governance Council principles that apply to managed investment schemes.	Head of RM&C	Yearly
1.7.5			Ongoing obligations utilise controls in Part 5, Section 19 to provide part of the assurance for ASX.	FC	Half yearly

1.8.1	LR 14	<p>Meetings</p> <p>Any meeting of members must be convened and held in accordance with the Listing Rules.</p>	<p>Arrangement of meetings of Members is subject to a detailed process that includes the preparation of papers for meetings that are reviewed and approved by a person separate to the prepared, and signoff from RM&C, Legal and the Fund Manager on all content and material for release.</p> <p>if resolutions are provided for voting, the Registrar attends the meeting and records all voting undertaken by Members, the results being published by release the next working day.</p>	Head of Investor Comms	Half yearly
1.9.1		<p>Additional requirements</p> <p>Where a scheme becomes or is part of the Top 300, it must comply with the recommendations set by the ASX Corporate Governance Council. The basis of compliance is incorporation into the annual report of the listed entity.</p>	<p>The Scheme must include in its annual report a response to each Principle as described by the Council.</p>	Head of RM&C	Yearly
1.9.2	<p>The content of the disclosure is reviewed and updated yearly by the relevant subject matter experts and is subject to a sign-off process.</p>				
1.9.3	<p>The final inclusions for the annual report are recommended for approval to the RE Board prior to finalisation of the Report.</p>				
<p>Performance Fees</p>					

2.1.1	Constitution	<p>Calculation period</p> <p>The performance fee allowed in the scheme constitution is to be calculated for each half year ended 31 December and 30 June as part of the preparation of financial statements (see also Master Plan Part 5, section 4).</p>	<p>The performance fee is calculated each half year cycle using the allowable method from the Constitution. It is checked by a person separate to the preparer, and subject to a peer review and signoff.</p>	FC, FM and CFO	Half yearly
2.2.1	Constitution	<p>Calculation method and payment</p> <p>The performance fee must be calculated using the methodology set out in the Constitution.</p>	<p>The performance fee is calculated each half year cycle (31 December and 30 June) in accordance with the requirements of the Constitution.</p> <p>The performance fee is determined by calculating the Scheme's total return, and if that exceeds the benchmark, the fee is payable using a calculation method of:</p> <ul style="list-style-type: none"> • 5% of the gross asset value for the first 1% of outperformance; and • 15% of outperformance in excess of 1% <p>The calculation is checked by a person independent of the prepared and subject to a peer review and signoff process.</p>	FC, FM and CFO	Half yearly
2.2.2	Constitution	<p>The RE must receive the performance fee in the form of units in the Scheme in lieu of cash.</p>	<p>The payment of the performance fee is completed by the issue of units (to the RE or to any party it nominates as the recipient of the units).</p> <p>The calculation of the number of units to be received is completed by the Fund Finance Manager using a</p>	FC, FM and CFO	Half yearly (or as the fee becomes payable in a period of

			<p>methodology of the dollar amount of the performance fee (in 2.2.1 above) divided by the higher of either the:</p> <ul style="list-style-type: none"> • 10-day VWAP per unit up to and including the distribution record date for the relevant performance period OR • the Fund's NTA per unit as at the final day of the performance period. <p>The calculation of units is checked by a person independent of the prepared, and subject to a peer review and signoff process prior to payment.</p> <p>The registry is notified of the units to be issued to the RE, and facilitates the recording of the units.</p>		absolute out performance)
2.3.1	ASX LR 3	<p>Disclosure and filings</p> <p>The performance fee must be disclosed in the required form to both ASX and Members.</p>	<p>The performance fee is disclosed:</p> <ul style="list-style-type: none"> • in the financial statements of the Scheme for the 6 months ended 31 December each year (whether paid in units or accrued); • in the relevant Appendix 3B lodged with ASX for each issue of units in lieu of cash in settlement of the performance fee; • in the annual report of the Scheme for the year in which the fee is either accrued and/or paid in the form of units. 	<p>FC, FM</p> <p>FC, FM</p> <p>Due diligence committee, FM</p>	<p>Half yearly</p> <p>Half yearly</p> <p>Yearly</p>
2.4.1	ASX LR10	<p>Waiver from ASX LR10</p> <p>Each three-year period, commencing from February 2010, the Scheme must</p>	<p>The RE applies to ASX for a waiver from ASX LR10 in writing for relief from the Rule each three year period.</p> <p>The relief application is reviewed and approved by the</p>	<p>FM, RE</p>	<p>Year 3 (not to occur more than 3 months</p>

		obtain written confirmation from ASX that its waiver from ASX LR10 is still applicable.	RE Board prior to being submitted to ASX.		prior to the expiration of the 3 year term of the waiver)
2.5.1	LR10.11 Constitution	Compliance with ASX LR10.11 Each three-year period, commencing from February 2010, the Scheme must obtain Member approval for the issue of units over the prior three years in lieu of the receipt of cash in settlement of performance fees.	Member approval for the issue of units will be obtained via a resolution at a Member meeting. Member meeting notices are to be completed in accordance with the ASX rules (see also Master Plan Part 5, section 11), and for performance fee purposes are considered with observance of the waiver requirements prior to issuing. The RE Board reviews and approves the notices prior to the issue to Members.	FM, RE	Year 3 (not to occur more than 3 months prior to the expiration of the 3 year term of the waiver)