



# Product Guide – Equities

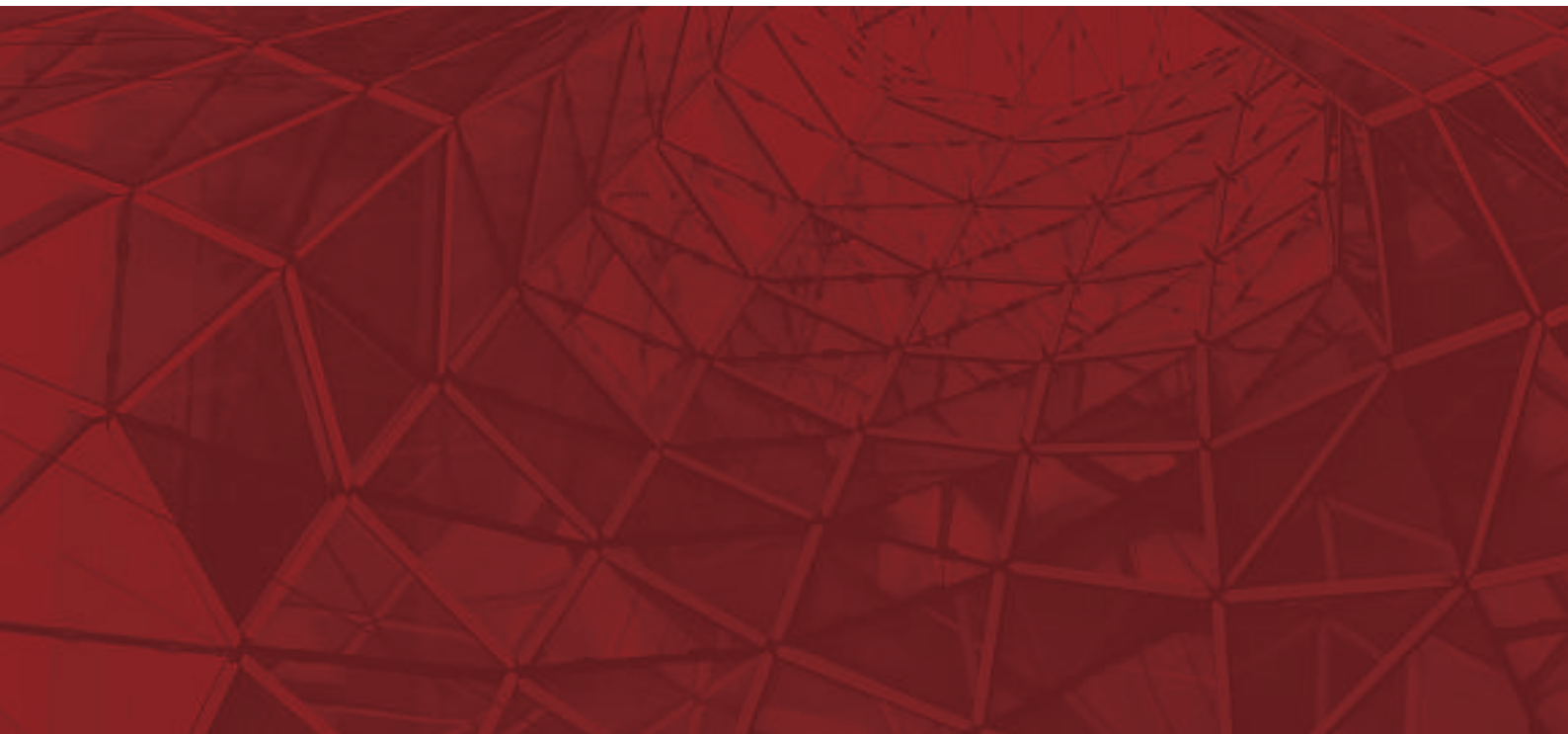
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Issued by: The Responsible Entity, MLC Investments Limited

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Investment Manager: Antares Capital Partners Ltd

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## Important information

This Product Guide – Equities (Product Guide) provides additional information about topics under the prescribed sections of the Product Disclosure Statement (PDS) for each of the funds (Funds and each a Fund). The Funds below are part of the suite of Antares Professional Selection Investment Funds. The information in this Product Guide forms part of these PDSs.

Fund name	ARSN	PDS Date
Antares Dividend Builder	115 694 794	3 October 2023
Antares Elite Opportunities Fund	102 675 641	3 October 2023
Antares Ex-20 Australian Equities Fund	635 799 530	3 October 2023

This Product Guide and the PDSs contain important information you should consider before making an investment decision in relation to the Funds. The information provided in this Product Guide and the PDSs is general information only and does not take into account your objectives, personal financial situation or needs. We recommend you obtain financial advice for your own personal circumstances before making any investment decision. These documents are available from [antarescapital.com.au](https://www.antarescapital.com.au) or you can request a copy free of charge by calling us on **1300 738 355** or by contacting your investor directed portfolio service, IDPS-like scheme, master trust or wrap operator (collectively referred to as an 'IDPS' in this Product Guide and the PDSs). To invest directly in a Fund you must have received the PDS (electronically or otherwise) within Australia.

The information in these documents is up to date at the time of preparation and may change from time to time. If a change is considered materially adverse, we will issue a replacement PDS. Information that is not materially adverse to investors can be updated by us and will be published on our website [antarescapital.com.au](https://www.antarescapital.com.au). A paper copy of any updates will be provided free of charge upon request. You should check you have the most up to date version before making an investment decision. All amounts in these documents are in Australian dollars unless stated otherwise.

This document has been prepared on behalf of MLC Investments Limited (MLC) ABN 30 002 641 661 AFSL 230705 as Responsible Entity of the Funds. MLC may also be referred to as 'us', 'we' or 'our'. MLC has appointed Antares Capital Partners Ltd, trading as Antares Equities (Antares), as investment manager of the Funds. Antares is a specialist Australian equities manager and is responsible for making investment decisions in relation to the Funds and implementing the Funds' investment strategies. MLC and Antares are part of the Insignia Financial Group of Companies, comprising Insignia Financial Ltd ABN 49 100 103 722 and its related bodies corporate (Insignia Financial Group). The capital value, payment of income and performance of the Funds are not guaranteed. An investment in the Funds is subject to investment risk, including possible delays in repayment and loss of income and principal invested.

# 1. How the Fund(s) work

## Transacting on your account

For all applications and withdrawal requests we will only act where completed information and communications are received by Antares Registry Services (Unit Registry). This includes all required information, attachments and funds as applicable. Evidence of posted or emailed information will not be sufficient to prove that information was received by the Unit Registry. MLC or the Unit Registry will not be liable for any loss or delay resulting from the non-receipt of all or any information and communications. Please read the Email Terms and Conditions in section 5 of this Product Guide.

Application monies will be held in trust in a non-interest bearing account until processed. If the Unit Registry is unable to process your application within 30 days of receipt we will return your money to you.

## Regular savings plan

Our Regular Savings Plan (RSP) helps you start saving regularly to reach your investment goals. It works for you by deducting an amount from your bank, building society or credit union account on a monthly basis and investing this money into the Fund you have chosen.

You can start your RSP with a minimum \$500 per month for each Fund that you want the RSP to apply to. To register for the RSP, please complete the relevant sections in the Initial Application Form or the Additional Investment Form if you are an existing investor in the Funds. You can stop using the RSP at any time by notifying the Unit Registry in writing. Please note to commence an RSP in relation to a Fund, a minimum balance of \$20,000 is required.

## Direct debit service agreement

If you wish to use our RSP, please complete the direct debit authorisation section of the Initial Application Form or Additional Investment Form if you are an existing investor in the Funds. This will enable the Unit Registry to make direct debits from your nominated account. The terms under which the direct debit facility operates are as follows:

### Availability of accounts

Payment by direct debit is not available on all types of accounts. Before you complete the relevant direct debit section of the Initial Application Form or Additional Investment Form, please confirm with your financial institution that direct debits can be made by the Unit Registry from your nominated account. It is your responsibility to ensure you advise the Unit Registry if your nominated account is about to be changed or closed.

### When will debits be made?

The nominated amount for each RSP is debited around the 15th of the month. The direct debit amount will be invested in the Fund(s) you have chosen. If the date on which any debits are due falls on a weekend or public holiday, the debit will be made on the next business day.

### Available funds

For the debit to occur you must ensure there are sufficient cleared funds in your account to meet the required debit on the due date.

### What happens if funds are not available?

Your financial institution will not pay us if there are insufficient cleared funds in your account to meet the required debit. If this happens we will not be able to issue you units. If any debit requested by you is not made, you remain obliged to pay any

amount owing to us until we receive your payment. In the event a debit from your account fails on two occasions, your RSP may be cancelled and we will provide written notification if this occurs. Cancellation of your direct debit arrangement does not affect any of your accrued rights.

### Direct debit disputes

If you believe that there has been an error in debiting your account, you should notify us directly on **1300 738 355** and confirm that notice in writing to the Unit Registry as soon as possible so that we can resolve your query more quickly.

If we conclude as a result of our investigations that your account has been incorrectly debited we will respond to your query by arranging for your financial institution to adjust your account (including interest and charges) accordingly. We will also notify you in writing of the amount by which your account has been adjusted.

If we conclude as a result of our investigations that your account has not been incorrectly debited we will respond to your query by providing you with reasons and any evidence for this finding in writing.

If we are unable to resolve your dispute, you may need to contact your financial institution.

### Alterations

If you wish to make any changes to your direct debit authority please complete the Change of Details Form available on our website at [antarescapital.com.au](http://antarescapital.com.au) or contact our Client Services team on **1300 738 355** in the first instance. You can also request to stop or defer a direct debit through your financial institution.

To process your changes, the Unit Registry must receive your request five business days before the date of your next scheduled debit. We can make changes to the terms of the direct debit service agreement at any time, including termination of the arrangement. To do this we will give you at least 14 business days' written notice.

### Stopping debits

You may stop a payment by notifying the Unit Registry in writing at least five business days before the date of your next scheduled payment. We will confirm to you in writing that the debit has been stopped. You may cancel or defer your participation in the direct debit facility by sending the Unit Registry written notice at least five business days before the date of your next scheduled debit.

## Margin lending

Investors may fund their application via a margin lending facility. If you are funding part of your application via a margin loan, please record the name of the margin lending provider on the Initial Application Form. MLC will provide account information to the margin lending provider if requested and your transactions will be subject to approval by your margin lending provider.

Please note there are specific rules and requirements in relation to the ability of self-managed superannuation funds to borrow that the trustee must ensure are met before proceeding with a margin lending facility. These are solely your responsibility.

For further details, please consider obtaining financial advice about the suitability of margin lending to your personal circumstances.

# 1. How the Fund(s) work

## Minimum balance

You need to maintain a minimum balance of \$20,000 per Fund. We may, however, accept lower amounts at our discretion.

## Discretion to accept or refuse applications

We have the discretion to accept or refuse any application for an initial investment or any additional investment without explanation.

## We may suspend applications or redemptions

We may suspend the issue of units or redemption of units in certain circumstances as provided in the PDS and constitution (Constitution) of the relevant Fund, including if we believe it is in the best interests of unitholders as a whole to do so, or if it is not possible to calculate an application price due to circumstances outside our control, eg market disruption.

Any application or redemption requests received during a period of suspension may receive the price applicable to the business day immediately following the end of the suspension period.

## Transfers

You may be able to transfer all or some of your unitholding to another eligible investor. Please contact Client Services on **1300 738 355** for more information.

## Electronic redemption facility and instructions

The electronic redemption facility allows the Unit Registry to accept a scanned copy of your completed Withdrawal Form without requiring the original copy of the instruction to release funds. The facility can only be used if the withdrawal proceeds are to be paid to a previously nominated Australian bank account.

If you wish the withdrawal proceeds to be paid to a bank account you have not previously registered with us, we will need to receive the original copy of the Withdrawal Form in the mail before funds can be released. The Withdrawal Form can be posted to the Unit Registry and is available at [antarescapital.com.au](http://antarescapital.com.au) or on request from Client Services on **1300 738 355**.

Payment will be subject to the Email Terms and Conditions outlined in section 5.

If you are advising the Unit Registry via email in respect of instructions (including applications, withdrawals and switching requests), it is important to be aware that MLC and the Unit Registry:

- will only process your emailed instructions if the relevant forms are scanned and received in full and have been signed by authorised signatories
- are not responsible for any loss or delay that results from an email transmission not being received by the Unit Registry.

## We may deduct amounts or redeem units in certain circumstances

We may deduct from a withdrawal payment any amount owed under the Constitution of the relevant Fund, including taxes.

## Termination of the Funds

A Fund may be terminated:

- if MLC believes the Fund can no longer fulfil its purpose
- if the Fund's unitholders pass an extraordinary resolution to terminate the Fund
- by Court order, or
- as otherwise allowed by the relevant Fund's constitution or the law.

## Selling restrictions

As at the date of the PDSs, no action has been taken to register or qualify the units or offer or otherwise permit the public offering of the units outside Australia. If you come into possession of the PDSs outside Australia, you should seek advice on and observe any restrictions imposed by local law. Any failure to comply with such restrictions may violate securities laws in that jurisdiction.

Each PDS does not constitute an offer or invitation in any jurisdiction in which it would be unlawful to make such an offer or invitation.

We reserve the right to make an offer of units to any institutional investor outside Australia where to do so would not be in breach of the securities law requirements of that jurisdiction.

As at the date of each PDS, the relevant Fund's units are sold predominantly through a public offering outside of the US, which means the relevant Fund is limited in the amount of investment it will accept from "US persons" (as defined under Regulation S of the US Securities Act of 1933).

## Unit pricing policy

If you would like to find out more about our unit pricing policies and how we will exercise any discretions in relation to unit pricing, please contact Client Services on **1300 738 355**.

You can view the current unit prices at any time at [antarescapital.com.au](http://antarescapital.com.au)

If there is a unit pricing error that substantially impacts a Fund's performance, an adjustment may be made. This will generally involve reprocessing affected transactions using the corrected unit price, adjusting your account or both. The value of your investment could be increased or decreased as a result.

## Income distributions

Distributions will generally be paid within 10 business days but by no later than two months after the distribution calculation date.

If we agree to reinvest the distribution on your behalf, additional units will be issued to you at the unit price applicable at the distribution calculation date. Buy spreads do not currently apply to the issue of these units.

## Unitholders' liability

The Funds' Constitutions limits unitholders' liability to the value of their investment in the Funds.

## 2. Responsible investment

Responsible investment is the practice of considering Environmental, Social and Governance (ESG) factors in the research, analysis, selection and management of investments and the implementation of good stewardship practices.

There are a broad range of ESG or sustainability factors that may impact the risk profile and or return characteristics of an investment. Some examples include:

### Environmental (E)

- Climate change initiatives like reduction in greenhouse gas emissions
- Waste management
- Energy efficiency
- Water supply
- Pollution
- Biodiversity

### Social (S)

- Human capital management
- Labour standards
- Modern slavery
- Diversity, Equity and Inclusion (DE&I)
- Workplace health and safety
- Integration with local community and earning a social licence to operate
- Indigenous rights
- Employee engagement

### Governance (G)

- Rights, responsibilities and expectations across all stakeholders
- Board structure, diversity and independence
- Executive remuneration (short- and long-term incentives)
- Bribery and corruption
- Anti-competitive behaviour
- Political lobbying and donations
- Shareholder rights
- Tax strategy

Sustainability factors are a broad range of issues that impact a company's ability to generate long-term shareholder value. These factors include, but are not limited to:

- Management as stewards of capital
- The industry within which capital is being stewarded
- Financial and physical capital (financial and manufactured assets on balance sheet)
- Non-financial capital (intangible forms of capital often not reflected on balance sheet such as human capital, social and relationship capital, natural capital and intellectual capital).

The consideration of ESG and sustainability factors in an investment context is evolving. It is expected that issues in addition to those covered above will be recognised over time.

The Funds are not promoted as socially responsible or ethical investments.

Except as stated below, the Responsible Entity does not take into account labour standards, environmental, social and ethical considerations for the purposes of selecting, retaining or realising investments.

### Responsible investment in the Fund

The Responsible Entity has delegated investment management decisions for the Funds to Antares Equities as investment manager. Antares Equities uses the following responsible investment approaches (where possible) to improve investment outcomes:

- **Identifying and considering relevant ESG factors** in the investment decision-making process (known as ESG integration). This allows them to recognise and act upon opportunities and risks related to ESG factors.
- **Being active owners** in the companies your money is invested in by using ownership rights, such as proxy voting and engaging with these companies on a range of commercial, strategic and ESG factors (known as active ownership or active stewardship). This provides an opportunity to enhance and protect the long-term value of investments.

Where there is an exclusion of some sectors and companies because they're associated with certain controversial business activities (known as a negative screen), see the 'What's excluded' section below.

ESG integration is undertaken by in-depth proprietary research and complemented by additional research of sustainability factors. The relevant insights of both considerations are systematically scored by proprietary frameworks which feed into the investment process (for risk and valuation) and which are also used to monitor the resulting portfolio.

The responsible investment approach for an investment manager can change. For example, this can occur through a change in approach by the investment manager or a change in an investment manager. We will notify you of any such changes in accordance with our obligations under the law.

### What's excluded

A negative screen is employed for the Funds to exclude investment in companies which manufacture cigarettes or other tobacco products or generates any revenue from manufacturing cigarettes or other tobacco products (referred to as Tobacco manufacturing in this document). The negative screen will apply to shareholdings or debt instruments applicable to the Funds.

A tobacco manufacturing company is a company that satisfies the following:

- Tobacco manufacturing, or
- >0% revenue limit from tobacco manufacturing.

The negative screen applies in respect of manufacturing and no other business activities by a company. Therefore the Funds may have exposure to activities related to the value chain for Tobacco manufacturing e.g. raw materials, production inputs, distribution, retail sales and the financing of such activities.

The revenue limits are determined as sales or revenue for the company from tobacco manufacturing as a proportion of the most recent-year net operating revenues from all ongoing lines of business of the company. For example, a 0% revenue limit would mean that any company with more than 0% of its most recent-year net operating revenue or sales coming from the excluded activity would be excluded from the Fund. The sales or revenue amount for the company is determined on appropriate publicly available revenue data. Our reputable third-party provider assesses and classifies companies' revenue sources to determine their industry classification based on the criteria.

## 2. Responsible investment

### Practical limitations

While this negative screen captures most companies, not all companies are required to make full disclosure about their involvement in these activities (or cannot be identified through indirect ownership structures). There are limitations in the availability, collection and reporting of this information. If a company's revenue mix changes (e.g. prior non-disclosure, or due to merger or demerger activities) and then exceeds the permitted revenue thresholds, a timely review of that company will be undertaken after it has been identified and its securities will be excluded as required.

The Funds may, from time to time, have a small level of unintended exposure. This could occur where there is a delay in data availability, an inability to exit an investment or as a result of indirect exposure through an externally managed investment. The Funds could have an exposure through the use of index options, futures, or exchange traded funds.

For further information on how the Funds invest your money, refer to section 5 'How we invest your money' in the PDS for the relevant Fund.



## 3. Fees and other costs

The fees and costs outlined in the PDSs and this Product Guide are for the Funds only.

If you are investing in the Funds via an IDPS, you will need to consider the fees and other costs of the IDPS when calculating the total cost of your investment.

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

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

The information in this table can be used to compare fees and costs between different simple managed investment schemes. Taxes are set out under the 'How managed investment schemes are taxed' section of this document. All fees are shown inclusive of GST and net of Reduced Input Tax Credits (where applicable).

### Fees and costs summary

Antares Professional Selection Investment Funds		
Type of fee or cost	Amount	How and when paid
Ongoing annual fees and costs <sup>1</sup>		
<b>Management fees and costs<sup>2</sup></b> The fees and costs for managing your investment	Estimated to be between 0.60% and 0.85% pa of the net asset value of the relevant Fund, comprised of: <ol style="list-style-type: none"> <li>A management fee of between 0.60% and 0.85% pa of the net asset value of the relevant Fund</li> <li>Estimated indirect costs of 0% pa of the net asset value of the relevant Fund.</li> </ol>	<ol style="list-style-type: none"> <li>The management fee is calculated on the net asset value of the Fund. It is not deducted from your account directly but from the assets of the Fund. It is paid in arrears, generally on a monthly basis, from the assets of the Fund. The amount of the management fee may be negotiated by wholesale clients. Refer to 'Management fee may be negotiated' in the 'Additional explanation of fees and costs'.</li> <li>Indirect costs are generally deducted from the assets of the Fund as and when they are incurred.</li> </ol>
<b>Performance fees<sup>3</sup></b> Amounts deducted from your investment in relation to the performance of the product	Estimated to be between 0.00% and 0.62% pa of the net asset value of the relevant Fund.	<b>Antares Elite Opportunities Fund</b> From 3 October 2023 onwards, MLC has elected to not charge a performance fee (ie 0% pa).  <b>Antares Ex-20 Australian Equities Fund</b> The performance fee is calculated as 15% of the difference between the Fund's quarterly return (after deducting the management fee and assuming reinvestment of distributions) and the Benchmark's <sup>4</sup> quarterly return multiplied by the Fund's average net asset value over the quarter. The accrued performance fee is payable from the assets of the Fund within 15 business days at the end of each quarter if the performance fee amount and the Fund's return for that quarter are both positive.  <b>Antares Dividend Builder</b> Performance fee is not applicable.
<b>Transaction costs</b> The costs incurred by the scheme when buying or selling assets	Estimated to be between 0.02% and 0.04% pa of the net asset value of the relevant Fund	These costs are paid from the assets of the relevant Fund as and when they are incurred. These costs are an additional cost to you.
Member activity related fees and costs (fees for services or when your money moves in or out of the scheme)		
<b>Establishment fee</b> The fee to open your investment	Nil	Not applicable
<b>Contribution fee</b> The fee on each amount contributed to your investment	Nil	Not applicable
<b>Buy-sell spread</b> An amount deducted from your investment representing costs incurred in transactions by the scheme	Estimated to be 0.15% of the application amount on investments made in the relevant Fund and 0.15% of the withdrawal amount on withdrawal from the relevant Fund.	The buy spread is added to the unit price when you buy units. The sell spread is deducted from the unit price when you sell units. The buy-sell spread is retained in the relevant Fund to cover the estimated transaction costs incurred as a result of investor applications and redemptions.
<b>Withdrawal fee</b> The fee on each amount you take out of your investment	Nil	Not applicable
<b>Exit fee</b> The fee to close your investment	Nil	Not applicable

### 3. Fees and other costs

<b>Antares Professional Selection Investment Funds</b>		
<b>Type of fee or cost</b>	<b>Amount</b>	<b>How and when paid</b>
Switching fee The fee for changing investment options	Nil	Not applicable

<sup>1</sup> Rounded to two decimal places.

<sup>2</sup> Refer to the PDS for the relevant Professional Selection Investment Fund for further information on the management fees applying to each Fund.

<sup>3</sup> Refer to the PDS for the relevant Professional Selection Investment Fund for further information on the performance fee applying to each Fund.

<sup>4</sup> The Benchmark is constructed by calculating the total return after removing the companies contained in the S&P/ASX 20 Total Return Index from the companies listed on the S&P/ASX 200 Total Return Index.



## Additional explanation of fees and costs

### Management fees and costs

The management fees and costs are fees and costs for investing the Fund's assets. The management fees and costs don't include buy-sell spreads or transaction costs.

Management fees and costs are made up of the management fee and indirect costs described below.

### Management fee

The Responsible Entity receives a management fee for managing the assets of the Funds and overseeing the day to day operations of the Funds. The Responsible Entity will pay out of its management fee any fees and other costs and expenses incurred in operating the Funds ('operational costs') such as custody costs, registry costs, auditing fees and tax return fees. The payment of any fees and other costs and expenses out of the management fee does not extend to the performance fee. This will be a cost to the Funds in addition to the management fee.

We may decide in the future to recover operational costs directly from the Funds in addition to the management fee.

### Indirect costs

The Funds may also incur costs and expenses that won't be charged as a management fee but are expected to reduce the net return of the Funds. These indirect costs may be incurred through investment in underlying investment funds. These indirect costs are reflected in the daily unit price and any reporting on the performance of the Funds.

Indirect cost amounts included in this document are based on actual costs incurred for the financial year to 30 June 2023 and involve estimates where information was unavailable at the date this document was issued. Amounts may vary from time to time and you will not be given advance notice of any changes to these amounts. Updated amounts will be available at [antarescapital.com.au](http://antarescapital.com.au)

### Performance fee

Refer to the PDS for the relevant Professional Selection Investment Fund for information on the performance fee applicable to each Fund.

### Transaction costs

Transaction costs are the costs incurred when assets in the Funds or in underlying investments are bought or sold and includes costs such as brokerage, stamp duty, settlement costs, clearing costs, custody transaction costs and government charges. Transaction costs may also be incurred when the market process for trading assets causes the price paid or received to be different from the value of the assets immediately after the transaction for example, where bid/ask spreads are incurred.

These costs are not included in the management fees and costs and are an additional cost to you. No part of the transaction costs are paid to us or any investment managers.

The indicative estimated transaction costs for the Funds (based on the 30 June 2023 financial year) are detailed in the table below:

Fund	Total estimated gross transaction costs (% pa)	Minus buy-sell spread recovery (% pa)	Equals transaction costs (% pa)
Antares Dividend Builder	0.07	0.05	0.02
Antares Elite Opportunities Fund	0.09	0.05	0.04
Antares Ex-20 Australian Equities Fund	0.23	0.21	0.02

Transaction costs in the 'Fees and costs summary' are stated net of the amount recovered through the buy-sell spread.

### Buy-sell spread

You incur the buy-sell spread when you buy or sell units in the Funds. The buy spread is added to the unit price when you buy units. The sell spread is deducted from the unit price when you sell units. The buy-sell spread is not a fee and no part of the buy-sell spread is paid to us or to any investment managers. The buy-sell spread is retained in the Funds to cover the estimated transaction costs incurred as a result of investor applications and redemptions.

Buy-sell spreads may change from time to time. Increases (and decreases) may be significant. The latest buy-sell spreads can be found at [mlcam.com.au/buy-sell-spreads](http://mlcam.com.au/buy-sell-spreads). Investors may not be notified of changes, and should check current buy-sell spreads before making any investment decision.

### Management fee may be negotiated

Wholesale clients who invest directly in the Funds may be able to negotiate the management fees by contacting Client Services on 1300 738 355.

Any discount in fees will be rebated periodically. We suggest that you consult your tax adviser in regards to the tax treatment of any fee rebates.

### Reimbursable expenses

We are entitled to be reimbursed from a Fund for all costs and expenses incurred in acting as Responsible Entity or in relation to the administration and management of the relevant Fund. The expenses may include, but are not limited to, PDS preparation and printing costs.

We currently pay these costs and expenses out of the management fee and do not charge them to you as an additional cost.

### Payments to IDPS operators

These are commercial payments made by the Responsible Entity to IDPS operators. These payments may be rebated to you or may be retained by the IDPS operator where allowed by law.

How and when these payments are made vary between the Responsible Entity and IDPS operators from time to time. They are paid by the Responsible Entity out of the management fee and are not an additional cost to you.

### Non-monetary benefits

We keep a register detailing certain non-monetary benefits that we receive (eg benefits valued between \$100 and \$300, genuine education or training and information technology software or

### 3. Fees and other costs

support). You can review an extract of the register by contacting Client Services on 1300 738 355. Please be aware that MLC may charge you for the cost of providing this information to you.

#### **Fees paid to related companies**

We may use the services of related companies where it makes good business sense to do so and will benefit our unitholders.

Amounts paid for these services are always negotiated on an arm's length basis and are, in the Responsible Entity's opinion, reasonable remuneration.

Appointments of these companies are made in accordance with the requirements of the Insignia Financial Group's Conflicts of Interest Policy.

The Responsible Entity regularly monitors the ongoing compliance of such appointments with the Insignia Financial Group's Conflicts of Interest Policy.

## 4. How managed investment schemes are taxed

### The AMIT regime

Each of the Funds is an Attribution Managed Investment Trust (AMIT).

This means:

- The Funds will be deemed to be a 'fixed trust' for taxation purposes.
- The allocation of taxable income to its investors is based on "attribution" on a "fair and reasonable basis", rather than a present entitlement to the "income of the Fund" for each financial year and the Fund is not liable for tax provided all its taxable income is attributed to investors.
- A Fund may make year-on-year adjustments to reflect under-or-over distributions of the Fund's income.
- Investors may increase or decrease the cost base of their units where taxable income attributed is either greater than or less than (respectively) broadly the cash distribution and tax offsets for an income year, to help alleviate the potential for double taxation.

Under the AMIT regime:

- Australian residents will include their share of the Fund's taxable income in their income tax return, and
- non-residents may have withholding tax deducted from distributions they receive from the Fund.

The Fund may accumulate income which is reflected in the unit price. Taxable income is attributed to investors, even if the Fund doesn't distribute its income.

However, we intend to continue our current practice of distributing all of the Fund's taxable income (including any capital gains) to our investors each financial year. We will notify you if this changes.

The details of the taxable income attributed to you will be set out in an AMIT Member Annual Statement (AMMA Statement), which will contain all necessary tax information. The tax payable (if any) depends on your individual tax profile and applicable tax rate.

If you disagree with our attribution of taxable income, you can object to the Commissioner of Taxation. If you decide to take this course, it is important that you obtain professional tax and legal advice. The constitution of each Fund provides for you to give us notice before making an objection, so please do so and we will work with you to try to resolve the issue.

### Taxation of Financial Arrangements (TOFA) regime

Certain financial arrangements may be taxed under the TOFA regime. The TOFA provisions aim to align the taxation recognition of gains and losses on financial arrangements with commercial recognition of such gains and losses. Under TOFA, the gains and losses on financial arrangements are recognised on an accruals basis rather than on realisation basis. In some cases, amounts may be recognised for taxation purposes before the relevant gains or losses are realised by the Fund.

### Non-residents

Investment income received may be subject to non-resident withholding tax. The amount of tax deducted will depend on the type of entity from which investment income is earned, the investment income type and your country of residence.

Conduit foreign income (CFI) received will generally be non-assessable, non-exempt income in Australia and not subject to Australian non-resident withholding tax. Broadly, CFI is foreign income earned by a foreign resident through an

Australian entity which in most instances is not assessable to that Australian entity.

Generally, Australian Capital Gains Tax on the disposal of investments by a non-resident will not apply where those investments are not taxable Australian property. In addition, non-residents will not be subject to withholding tax on the distribution of capital gains derived from fund assets that are not taxable Australian property.

Taxation and Distribution statements are generically prepared from an Australian resident investor perspective.

Investors who are non-residents for Australian tax purposes should seek professional taxation advice to clarify their specific circumstances.

All payments and transactions to, and by, the Funds are in Australian dollars. Payments from/into non-Australian bank accounts may incur currency conversion fees. Non-Australian resident investors should seek advice from their banking institution.

### Australian tax file number

MLC is authorised under the *Income Tax Assessment Act 1936* (Cth) to ask for your Australian tax file number (TFN) when you open an investment account for income distribution purposes. You don't have to provide your TFN and it's not an offence if you decide not to, but if you don't, 'Pay As You Go Withholding Tax' will be deducted at the highest marginal tax rate (plus Medicare Levy) from any income distributions payable to you.

## 5. Other information

### Email terms and conditions

If emails are used in operating your account, you should understand that there is potentially a greater risk that a person could fraudulently send us an email and, by pretending to be you, withdraw money from your account.

These terms and conditions apply when we (or the Unit Registry) receive email instructions or communications about your account. These terms are in addition to any other requirements relating to you giving us instructions or completing any particular authority. We can change these terms by giving you 14 days' written notice.

By investing in a Fund, you agree that MLC, Antares and the Unit Registry are not responsible for any losses you may suffer as a result of any fraudulent communications received by email, except to the extent those losses arise directly from their or their agents' negligence, wilful default or fraud. You agree to be liable and indemnify MLC, Antares and the Unit Registry for any losses suffered by any of them as a result of any fraudulent communications received by email to the extent those losses arise from your negligence, wilful default or fraud.

MLC and the Unit Registry will only act when we receive completed communications from you. MLC and the Unit Registry will not be liable for any loss which results from not receiving your email, or from a delay in receiving your email.

### Joint investors

Unless otherwise expressly indicated, in the case of joint applications, units will be held as joint tenants and either investor will be able to operate the account and bind the other investor for future transactions, including additional investments and withdrawals.

### Anti-money laundering

Under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (AML/CTF Act), we are required to collect original certified copies of original document(s) (not scanned copies), which must be valid at the time you send them to Antares Registry Services, to verify your identity and that of related parties (including if you are a non-individual entity, identity of any persons who are deemed to own or control (directly or indirectly) you ('beneficial owner')).

In addition, under the AML/CTF Act, we may be required to ask you for additional identity verification documents or information about you, a related party or a beneficial owner either when we are processing your application or at some stage after we issue the units.

Until the Unit Registry receives this documentation (or if we have concerns that a transaction requested by you, or anyone authorised to act on your behalf, might breach any obligations we have under legislation or cause us to commit or participate in an offence, under any law) we reserve the right to:

- block, suspend or refuse to process transactions
- freeze accounts or access to funds, or
- close your account without further notice.

These actions may be taken if we have reasonable grounds to suspect that there is a breach of any of our regulatory obligations, including where there may be a risk of damage to our reputation.

We also reserve the right to report details of accounts or transactions to the relevant authorities. Where transactions are delayed, blocked, frozen or refused in the above circumstances,

we're not liable for any loss you suffer, including consequential loss. We will incur no liability to you or a related party if we do so.

### Your privacy

We are committed to protecting your privacy. Any personal information we collect about you will be handled in accordance with our privacy policy, which outlines how we manage your personal information, how you may access or correct your personal information, and how you may complain about a breach of your privacy. To obtain a copy of our privacy policy, please contact Client Services on **1300 738 355** or visit [mlcam.com.au/privacy](http://mlcam.com.au/privacy)

We collect your personal information from the application form you complete when applying for this product for the purpose of providing you with the products and services that you request and for related purposes, including providing you with financial advice and ongoing services in relation to your account with us, or providing information about other products and services that may be of interest to you. If you do not provide all the information requested in your application form, we may not be able to process your application.

To verify your identity for Know Your Customer (KYC) purposes, we may also solicit personal information about you from reliable identity verification service providers.

For the purpose of providing you with the products or services you have requested, we may disclose your personal information to our related bodies corporate or external parties, including your financial adviser or employer, banks or other financial institutions, medical professionals, insurers, legal or accounting firms, auditors, mail houses, or when required or authorised to do so by law. It is generally unlikely that we will disclose your personal information overseas; however any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with Australian privacy laws.

## Keeping you informed

If you invest directly into a Fund, we will provide you with the information set out in the table below. We may provide this information to you by post, email or by making the information available on [antarescapital.com.au](http://antarescapital.com.au). We'll notify you when information about your investment has been made available online. If you wish to obtain information on your account and update your details (including a preference to receive updates about your account by post), please contact our Client Services team. See 'Contact details' at the end of this Product Guide.

If you invest in a Fund via an IDPS, you can obtain information on your investment by contacting your IDPS operator. Past performance figures and asset allocation information are updated on a monthly basis and are available free of charge at [antarescapital.com.au](http://antarescapital.com.au) or by contacting Client Services on **1300 738 355**. Past performance is not a reliable indicator of future performance.

Information provided to direct investors	
Transaction confirmation	Confirms any investment, or withdrawal you make on your account. This is also available online via the Antares online investor portal at <a href="http://antarescapital.com.au">antarescapital.com.au</a>
Periodic statement	Provides details regarding your account balance, a summary of any transactions on your investment, fees and costs incurred during the period and information about returns on your investment each quarter. A monthly statement outlining your transactions is available upon request by contacting Client Services on <b>1300 738 355</b> . This is also available online via the Antares online investor portal at <a href="http://antarescapital.com.au">antarescapital.com.au</a>
Distribution statement	Provides details of the distributions paid on your account. This is also available online via the Antares online investor portal at <a href="http://antarescapital.com.au">antarescapital.com.au</a>
Annual taxation statement	You will be provided with an annual taxation statement, referred to as an AMIT Member Annual Statement (AMMA Statement), to assist you in completing your tax return. The AMMA Statement will show the taxable and non-taxable components of the income attributed to you (which includes any distributions received or reinvested). This is also available online via the Antares online investor portal at <a href="http://antarescapital.com.au">antarescapital.com.au</a>
Annual financial report	You can elect to receive, free of charge, a copy of the Funds' annual report as a hard copy or an electronic copy. If you do not make an election, you can access a copy of the Funds' annual report on our website <a href="http://antarescapital.com.au">antarescapital.com.au</a>
Constitution	Available to you without charge on request by contacting Client Services on <b>1300 738 355</b> .
Performance history	
Unit Pricing Policy (including discretions register)	
Derivatives Policy	
Privacy Policy	
Product Disclosure Statement updates	You can obtain a copy of the latest PDS and this Product Guide on request by contacting Client Services on <b>1300 738 355</b> or visiting the website <a href="http://antarescapital.com.au">antarescapital.com.au</a> . The PDS and this Product Guide may be updated or replaced from time to time.

## **Contact details**

### **Unit Registry**

#### **Antares Registry Services**

GPO Box 804  
Melbourne VIC 3001

Email:  
[antaresequities\\_transactions@unitregistry.com.au](mailto:antaresequities_transactions@unitregistry.com.au)

#### **Client Services**

PO Box 200  
North Sydney NSW 2059 Australia

Toll free: 1300 738 355

Email:  
[investorservices@antaresequities.com.au](mailto:investorservices@antaresequities.com.au)

#### **Responsible Entity**

MLC Investments Limited  
PO Box 200  
North Sydney NSW 2059 Australia

#### **Website**

[antarescapital.com.au](http://antarescapital.com.au)