

# Burrell Smallcap, Midcap and Resources Trust

## ADDITIONAL INFORMATION TO THE PRODUCT DISCLOSURE STATEMENT (ADDITIONAL INFORMATION)



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The information in this document forms part of the Product Disclosure Statement (PDS) dated 30 September 2022 issued by Burrell Securities Limited ABN 92 083 535 031 (**Burrell Securities, Responsible Entity, we, us or our**) (AFS Licence No. 381667) about the Burrell Smallcap, Midcap and Resources Trust ARSN 600 185 500 (**Fund**).

You should read this information together with the PDS before making a decision to invest in the Fund.

The information in this Additional Information document is general information only and does not take into account your personal financial situation or needs. You should consult a financial adviser to obtain financial advice that is tailored to suit your personal circumstances.

This Additional Information document is dated 30 September 2022.

### Updated Information

Information in this PDS may change from time to time. Any updates to information which are not considered materially adverse will be provided on the website at [www.burrell.com.au/bsmart](http://www.burrell.com.au/bsmart). Please check the website or call Burrell Securities or your financial adviser for any updates prior to investing. A paper copy of this PDS and any updates will be

# BURRELL

## 1. About Burrell Securities Limited

### Burrell Stockbroking Pty Ltd

Burrell Stockbroking Pty Ltd ABN 82 088 958 481 (**Burrell Stockbroking**) (AFS Licence No. 247431) has been appointed by the Responsible Entity as the investment adviser of the Fund. Burrell Stockbroking is a longstanding Queensland company providing full stockbroking, wealth management, superannuation and advisory services to private clients, Not-for-Profit and other investment organisations. Established in 1937, Burrell Stockbroking has achieved over 80 years in the business. Burrell Stockbroking remains one of the last privately held broking firms in the country. For more information on Burrell Stockbroking visit [www.burrell.com.au](http://www.burrell.com.au).

## 2. How Burrell Smallcap, Midcap and Resources Trust works

### Custodian

Burrell & Co Holdings Pty Ltd ABN 58 121 508 978 (AFS Licence No. 352203) has been engaged as custodian to hold the assets of the Fund. The custodian holds legal title to all Fund assets, in its capacity as agent of the responsible entity of the Fund, and acts on instructions which we, or our agents, provide.

Any fees payable to the custodian are a Fund expense and paid from the Fund assets. However, the custodian does not currently charge any fees to the Fund.

### Additional investments

Additional investments can be made at any time by sending your written instructions together with your cheque or electronic funds transfer (EFT) confirmation. It is not necessary for you to complete another Application Form. Additional investments are made on the basis of the PDS current at the time of investment. The latest PDS is available at [www.burrell.com.au/bsmart](http://www.burrell.com.au/bsmart) or by calling (07) 3006 7200.

### How to withdraw

You can withdraw from your investment by mailing or faxing us a letter including full details of your name, investor number, number of units or dollar amount you wish to withdraw and bank account details. From time to time, we may agree to accept withdrawal requests given to us by other methods. The minimum withdrawal is \$2,000.

Requests must be signed by the appropriate authorised signatories. Cheques and bank accounts must be in the name/s of the investor/s as specified in the Application Form or as otherwise notified to the Responsible Entity. Proceeds will be paid in Australian Dollars.

Partial withdrawals are subject to you maintaining a minimum balance of \$5,000. If your withdrawal request will result in your investment being less than the minimum balance then we may treat your withdrawal request as relating to your entire investment.

### Unit pricing policy

We have a policy for unit pricing discretions we use in relation to the Fund for the purposes of ASIC Class Order 13/657. Additional documents may be prepared for this purpose from time to time. This document may be revised or updated to reflect changes in the Fund Constitution or to our pricing policies. The unit pricing policy and discretions we exercise are available from us free of charge upon request.

### Transfers

You can request a transfer of some or all of your units to a third party by completing and signing a transfer form and providing us with any other documentation required by us or any law. You can obtain a transfer form by contacting us on (07) 3006 7200. Burrell Securities reserves the right to refuse to register a transfer of units.

### Indirect investors

We authorise the use of the PDS for investors who wish to invest in the Fund indirectly through an Investor Directed Portfolio Service (IDPS), IDPS-like scheme or a nominee or custody service (collectively referred to as **wrap accounts** or **master trusts**).

If you invest in the Fund through a wrap account or master trust, you do not become a unitholder in the Fund and therefore do not have the rights of a unitholder. The operator or custodian of the wrap account or master trust becomes a unitholder and acquires these rights and may exercise these rights as they see fit.

Please note that the operator or custodian of the wrap account or master trust may also apply different conditions to those outlined in this PDS including different cut-off and processing times for applications and withdrawals and different timeframes for payment of

distributions and sending reports and notices to you. If you invest in the Fund through a wrap account or master trust, you should contact the wrap account or master trust for any investor queries. We do not directly send you statements regarding your investment in the Fund (e.g. distribution statements, annual reports).

### 3. Benefits of investing in the Burrell Smallcap, Midcap and Resources Trust

No additional information.

### 4. Risks of managed investment schemes

Neither the Responsible Entity nor Burrell Stockbroking guarantees the performance of the Fund, the repayment of capital or any particular rates of return. Returns are not guaranteed, and the value of your investment upon redemption may be less than your investment in the Fund. Past performance is not a reliable guide to future performance and should not be relied upon to predict the value of an investment.

#### Risk v Potential Rate of Return

Generally, the greater the potential return of an investment, the greater the risk of loss. To help understand the correlation between risk and return, investors should refer to the following table where, in the second column various risks are defined and the third column shows this correlation of potential return. The table illustrates how the categories relate to each other in terms of risk and return.

Risk Category	Description	Potential Return
<b>Cautious:</b>	You are seeking a relatively low-risk investment. You don't want to aim for higher returns if it means your portfolio may decrease significantly in value (e.g. Using the Standard Risk Measure (SRM) to calculate the likely number of negative annual returns over a 20 year period, you have the ability to bear up to 1 negative return over a 20 year period (SRM 1 to 2) and are comfortable with a low target return profile. We recommend a minimum investment term of three years.	<b>Low</b>
<b>Conservative:</b>	You are prepared to accept a small amount of risk. However, your priority remains the preservation of capital over the medium to long term (e.g. you have the ability to bear up to 2 negative returns over a 20 year period (SRM 1 to 2) and are comfortable with a low target return profile. As a conservative investor there is a risk of your portfolio decreasing in value, although this is substantially reduced for investments over the recommended minimum investment term of five years.	<b>Low-Medium</b>
<b>Balanced:</b>	You have some understanding of investment market behaviour and can accept some short-term risk of capital (e.g. you have the ability to bear up to 4 negative returns over a 20 year period (SRM 3 to 5) and are comfortable with a moderate target return profile. You do not wish to see your capital eroded by tax and inflation and are prepared to take some risk in order to gain long term capital growth.	<b>Medium</b>
<b>Moderate Growth:</b>	You are seeking a higher return investment. Your portfolio will have a bias towards capital growth, with the objective of preserving the real value of capital over time. Your portfolio will have a lower income in order to target a higher target return profile than other portfolio types in the near term, as a primary concern is to accumulate assets over the medium to long term. You are prepared to accept a higher degree of volatility and risk (e.g. you have the ability to bear up to 6 negative returns over a 20 year period (SRM 6).	<b>Medium-High</b>
<b>High Growth and 100% Equities:</b>	You are seeking a higher return investment. You are prepared to invest for a long term and ride out extended periods of negative returns provided you may benefit from higher returns and possibly other risk factors, such as leverage. You understand that there is a high degree of volatility and risk with this portfolio type, and you may suffer capital losses (e.g. you have the ability to bear 6 or more negative returns over a 20 year period (SRM 7).	<b>High-Very High</b>

**This table is not a projection of expected returns and is only intended to demonstrate the general risk and return relationship. Past performance is no guide to future performance and cannot be relied upon to predict the value of an investment.**

## Financial Advice

It is recommended that investors obtain professional advice before making any investment decision. Using the categories outlined above is not a substitute for personal advice or a detailed financial plan. The information provided is only a guide to help investors consider their approach to investing. It is recommended investors speak with an adviser to decide on an investment strategy that is best suited for them.

### 5. How we invest your money

No additional information.

### 6. Fees and costs

#### Additional Explanation of Fees and Costs

##### Management Costs

The Management Cost is estimated as up to 1.70% per annum of the net asset value of the Fund. The Management Cost is an estimate as at the date of this PDS.

Management costs comprise the management fees payable to Burrell Stockbroking for managing the Fund's investments, an administration fee payable to Burrell Stockbroking for providing administration services and estimated indirect costs. The expenses of operating the Fund (other than extraordinary expenses) are paid by Burrell Stockbroking from its administration fee. We do not currently charge a fee for overseeing the Fund's operations as responsible entity and Burrell & Co Holdings Pty Ltd does not currently charge any fees for providing custodial services. **Management fee**

The management fee is comprised of:

- a) Portfolio administration fees - Burrell Stockbroking is entitled to fees for the administration of the Fund's portfolio. For the first \$500,000 of the Fund Value (being the gross asset value of the Fund), the fee is 0.44% per annum of the Fund Value; and for the amount of the Fund Value in excess of \$500,000, the fee is 0.22% per annum of the Fund Value. This fee is calculated and accrues daily and is payable monthly in arrears.
- b) Investment Advice Fee - Burrell Stockbroking is entitled to fees for the investment management of the portfolio currently equal to 0.44% per annum of the Fund Value. The fee is calculated and accrues daily and is payable monthly in arrears.

If extraordinary or unusual expenses are incurred we may choose to recover these costs from the Fund and this will be reflected in the unit price.

We reserve the right to change fees and other costs without your consent, but subject to any limitations under the Corporations Act and other applicable laws.

##### Administration fee

Burrell Stockbroking provides administration services to the Fund, including accounting (tax), audit, registry and secretarial services, for which it is entitled to an administration fee. The administration fee is currently 0.82% per annum of the net asset value of the Fund and is calculated and accrues daily and is payable monthly in arrears. In consideration for the administration fee, Burrell Stockbroking is responsible for paying the expenses incurred in administering the Fund (other than extraordinary or unusual expenses and transaction costs).

##### Indirect costs

Indirect costs are reflected in the unit price of your investment in the Fund. This means that they are amounts that reduce the returns on the units that are paid from the income or assets of the Fund. The indirect costs shown in the 'Fees and costs summary' in section 6.1 of the PDS is an estimate, and the estimated cost is 0.03% p.a. of the net asset value of the Fund (for every \$50,000 you have in the Fund, you will pay an estimate of \$15 in indirect costs each year). The indirect costs may vary from year to year, including to the extent that they rely on estimates.

Indirect costs are an estimate of the indirect underlying management costs of managed funds, trusts, exchange traded indexes, exchange traded funds and listed investment companies in which the Fund invests from time to time. These underlying management costs are included in the security price or unit price of the applicable managed funds, trusts, exchange traded indexes, exchange traded funds and listed investment companies.

## **Custodian fee**

Burrell & Co Holdings Pty Ltd is entitled to receive a custodian fee, but does not currently charge any fee to the Fund.

## **Other fees and costs**

### **Transactional costs**

Transactional costs such as brokerage, government taxes/duties/levies, bank charges and account transactions may be paid by the Fund.

Transaction costs incurred as a result of unitholders going out of the Fund may be recovered by way of the sell spread charged to investors. Other transaction costs are additional costs to unitholders that are deducted from the assets of the Fund. Such costs are recovered as they are incurred and reflected in the unit price.

The transaction cost amount shown in the 'Fees and costs summary' in section 6.1 of the PDS is an estimate, and the estimated transaction costs are 1.08% p.a. of the net asset value of the Fund (for every \$50,000 you have in the Fund, you will pay an estimate of \$540 in transaction costs each year), after taking into account the costs recovered by way of the sell spread. The estimated transaction costs for the Fund, excluding the amount recovered by way of the sell spread, are also 1.08% p.a. of the net asset value of the Fund (for every \$50,000 you have in the Fund, you will pay an estimate of \$540 in transaction costs each year excluding the amount recovered from the sell spread payable on withdrawals by investor) which reflects that, for the financial year ending 30 June 2022, there were limited withdrawals and the amount recovered from the sell spread was immaterial and did not impact the estimated transaction costs (as a percentage of the net asset value of the Fund). However, past performance is not a reliable indicator of future performance and this may not be reflective of the level of withdrawals in future periods.

Transaction costs may vary as the turnover in the underlying assets may change substantially as investment and market conditions change that may affect the level of transaction costs not covered in the sell spread. Further, there are highly variable drivers upon which such transaction costs are dependent.

### **Transaction costs: sell spread**

When you withdraw all or part of your investment, we use what is called a sell spread to recover transaction costs incurred. Because there are costs in selling assets, we use the sell spread to direct these costs to investors withdrawing their investment rather than other investors in the Fund. We do not charge a buy spread on investments into the Fund.

The sell spread is the difference between the Fund's unit price and the redemption price and is a cost incurred by investors each time they withdraw funds.

The sell spread that applies to the Fund is calculated as 0.55% of the unit price and is subtracted from the unit price to determine the redemption price. Therefore, if you redeemed \$50,000 of units from the Fund, the cost of the sell spread would be \$275.

### **Adviser remuneration**

If your financial adviser recommends you invest, or facilitates your investment, in the Fund, you can elect to pay them a commission up to 2.2% of the first \$100,000 of your investment amount and 1.1% thereafter of any additional amount you invest, by marking the appropriate box on the Application Form.

If you instruct us on the Application Form to pay a commission to your financial adviser on your behalf we will deduct such amount from your application moneys and pay it to your financial adviser at the time units are issued.

For example, if your application amount was \$10,000 and you requested we pay your financial adviser a commission of 2.2%, we would pay \$220 from your application amount to your financial adviser and issue you \$9,780 of units (and therefore you will have invested \$9,780 in the Fund).

### **Extraordinary Expenses**

The administration fee payable to Burrell Stockbroking generally covers the administration services required in operating the Fund. However, if extraordinary or unusual expenses are incurred beyond the scope of the administration services covered by the administration fee we may choose to recover these costs from the Fund. Examples of this type of expense include the costs involved in:

- convening a meeting of investors;
- termination of the Fund;
- amending the Constitution;
- defending or bringing of litigation proceedings; or

- replacement of the Responsible Entity.

### **Constitution fee provisions**

The Constitution provides for a contribution fee (of up to 2.2% of an investor's application money) and management fees (of collectively up to 2.42% per annum of Fund Value) for the Responsible Entity. The Responsible Entity does not currently charge any fees to the Fund as fees are payable to Burrell Stockbroking for investing the Fund's assets and managing the portfolio.

### **Goods and Services Tax (GST)**

The fees specified in the PDS include the net effect of Goods and Services Tax (GST) and the benefits of reduced input tax credits (RITC) where applicable, unless otherwise specified.

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

### **Taxes**

A summary about the taxation considerations of investing in the Fund is set out in section 7 of the PDS.

### **Changes to fees and costs**

Fees can change for various reasons including because of changing economic conditions and changes in regulation. We can change these fees and costs without your consent, subject to any limitations under the Corporations Act and other applicable laws, but we will provide you with 30 days written notice of any proposed increase in fees. We also reserve the right to waive or reduce any of the fees and costs described in this PDS without prior notice.

Fees may be individually negotiated with wholesale clients

## **7. How managed investment schemes are taxed**

No additional information.

## **8. How to apply**

No additional information.

## **9. Additional Information**

### **Target Market Determination (TMD)**

Our TMD is available at [www.burrell.com.au/bsmart](http://www.burrell.com.au/bsmart)

Warning: This Fund is not suitable for investors seeking Capital Preservation, Capital Guaranteed returns, investors with a Low risk vs return profile, investors with a short term investment timeframe, or investors who require daily liquidity.

### **Keeping track of your investment**

To help you keep track of your investment, you will receive the following information:

- 1) confirmation of your investments and withdrawals, usually within five business days of receipt of your request;
- 2) a distribution statement, following each distribution;
- 3) a tax statement and annual statement following the end of each financial year; and
- 4) access to the Fund's Financial Statements at [www.burrell.com.au/baet](http://www.burrell.com.au/baet).

### **Material agreements**

Burrell Securities as responsible entity has entered into investment adviser agreements with Burrell Stockbroking.

Burrell Securities as responsible entity has also appointed Burrell Stockbroking to provide services to the Fund under a shared services agreement. Burrell Securities as responsible entity has also appointed Burrell Stockbroking to providing stockbroking services to the Fund. Burrell Stockbroking is a related party of Burrell Securities.

Burrell Securities as responsible entity has engaged Burrell & Co Holdings Pty Ltd as custodian of the Fund. Burrell & Co Holdings Pty Ltd is a related party of Burrell Securities.

## ***Fund Constitution***

The Fund is governed by a Constitution. The Fund's Constitution contains rules relating to a number of issues including:

- 1) unitholder rights;
- 2) the process by which units are issued and redeemed. We can accept or reject investments into the Fund at any time and are not required to give any reason or grounds for such refusal;
- 3) the calculation and distribution of income;
- 4) the investment powers of the Responsible Entity;
- 5) the Responsible Entity's right to claim indemnity from the Fund and charge fees and expenses to the Fund;
- 6) the creation of other classes of units;
- 7) the termination of the Fund;
- 8) retirement and removal of the Responsible Entity (including details of any relevant unitholder approval required); and
- 9) unitholders' liabilities (which are generally limited to the value of their investment). It is unlikely unitholders would be subject to any obligation to contribute further funds arising from a decrease in the value of the Fund, however this view has not been fully tested at law.

Together with the Corporations Act, the Constitution sets out the rules and procedures under which the Fund operates and our rights, responsibilities and duties as Responsible Entity, as well as those of investors. We may alter the Fund's Constitution if we reasonably consider the amendments will not adversely affect unitholders' rights. Otherwise (subject to any applicable exemption under law), we must obtain unitholder approval by a special resolution of the unitholders of the Fund. A copy of the Fund's Constitution can be inspected at our office or provided free of charge upon request.

### ***Investment Adviser Agreement – Burrell Stockbroking***

Burrell Securities as responsible entity has entered into an Investment Adviser Agreement with Burrell Stockbroking Pty Ltd (**Burrell Stockbroking**) relating to the provision of investment advice for the Fund. Fees are payable to Burrell Stockbroking for its services under this agreement which are to be agreed from time to time. Fees (comprising the 'investment advice fee') so payable are set out in section 6 of the PDS and further information is provided in section 6 of this document.

Whilst the Investment Adviser Agreement (Burrell Stockbroking) is ongoing in nature, it may be terminated in several circumstances including the event of insolvency of Burrell Stockbroking, if Burrell Stockbroking ceases to carry on business or if Burrell Securities ceases to be the responsible entity of the Fund.

The Responsible Entity and Burrell Stockbroking are related parties as they are both part of the same corporate group. The Australian Securities and Investments Commission (**ASIC**) requires the following information to be provided to investors about a related party arrangement:

- a) the value of the financial benefit – Burrell Stockbroking will receive the fees described in section 6 of the PDS and section 6 of this document;
- b) the nature of the relationship – the Responsible Entity and Burrell Stockbroking are related bodies corporate as they are both wholly owned subsidiaries of the same parent company;
- c) whether the arrangement is on arm's length terms or some other exception in the Corporations Act applies – the Responsible Entity considers Investment Adviser Agreement (Burrell Stockbroking) to be on arm's length terms;
- d) was investor approval sought for the Investment Management Agreement – no, investor approval was not required as the Investment Adviser Agreement (Burrell Stockbroking) is on arm's length terms;
- e) risks associated with the related party arrangement – the key risk with the Responsible Entity and Burrell Stockbroking being related parties is, because of their relationship, the Responsible Entity may fail to sufficiently monitor and review the Burrell Stockbroking's performance and compliance with its obligations under the Investment Adviser Agreement (Burrell Stockbroking) to the detriment of investors; and
- f) details of the policies and procedures the Responsible Entity has in place for entering into related party transactions, including how compliance with these policies and procedures is monitored – all counterparty agreements, including related party transactions, must be approved by the Responsible Entity's Board. A review of the Investment Adviser Agreement (Burrell Stockbroking) is undertaken at least annually and reported to the Board.

### ***Shared Services Agreement – Burrell Stockbroking***

Burrell Securities as responsible entity has entered into a Shared Services Agreement with Burrell Stockbroking relating to the provision of administrative services for the Fund. Fees are payable to Burrell Stockbroking for its services under this agreement which are to be agreed from time to time. Fees (comprising the 'portfolio administration fee and Fund administration fee') so payable are set out in section 6 of the PDS and further information is provided in section 6 of this document. As well as these fees Burrell Stockbroking may receive standard brokerage and associated fees for stockbroking services provided to the Fund.

Whilst the Shared Services Agreement is ongoing in nature, it may be terminated in several circumstances including the event of insolvency of Burrell Stockbroking, if Burrell Stockbroking ceases to carry on business or if Burrell Securities ceases to be the responsible entity of the Fund.

The Responsible Entity and Burrell Stockbroking are related parties as they are both part of the same corporate group. ASIC requires the following information to be provided to investors about a related party arrangement:

- a) the value of the financial benefit – Burrell Stockbroking will receive the fees described in section 6 of the PDS and the section 6 above, as well as standard brokerage and associated fees for stockbroking services;
- b) the nature of the relationship – the Responsible Entity and Burrell Stockbroking are related bodies corporate as they are both wholly owned subsidiaries of the same parent company;
- c) whether the arrangement is on arm's length terms or some other exception in the Corporations Act applies – the Responsible Entity considers the Shared Services Agreement to be on arm's length terms;
- d) was investor approval sought for the Shared Services Agreement – no, investor approval was not required as the Shared Services Agreement is on arm's length terms;
- e) risks associated with the related party arrangement – the key risk with the Responsible Entity and Burrell Stockbroking being related parties is, because of their relationship, the Responsible Entity may fail to sufficiently monitor and review Burrell Stockbroking's performance and compliance with its obligations under the Shared Services Agreement to the detriment of investors; and
- f) details of the policies and procedures the Responsible Entity has in place for entering into related party transactions, including how compliance with these policies and procedures is monitored – all counterparty agreements, including related party transactions, must be approved by the Responsible Entity's Board. A review of the Shared Services Agreement is undertaken at least annually and reported to the Board.

#### ***Custodian Agreement – Burrell & Co Holdings Pty Ltd***

Burrell Securities as responsible entity has entered into a Custodian Agreement with Burrell & Co Holdings Pty Ltd (**Custodian**) relating to the provision of custody services for the Fund. Fees are payable to the Custodian for its services under this agreement which are to be agreed from time to time. As set out in section 6 of the PDS and section 6 of this document, no fee is currently payable to the Custodian.

Whilst the Custodian Agreement is ongoing in nature, it may be terminated in several circumstances including the event of insolvency of the Custodian, if the Custodian ceases to carry on business or if Burrell Securities ceases to be the responsible entity of the Fund.

The Responsible Entity and the Custodian are related parties as they are both part of the same corporate group. ASIC requires the following information to be provided to investors about a related party arrangement:

- a) the value of the financial benefit – no fee is currently paid to the Custodian;
- b) the nature of the relationship – the Responsible Entity and the Custodian are related bodies corporate as the Custodian is the ultimate parent company of the Responsible Entity;
- c) whether the arrangement is on arm's length terms or some other exception in the Corporations Act applies – the Responsible Entity considers the Custodian Agreement to be on arm's length terms;
- d) was investor approval sought for the Custodian Agreement – no, investor approval was not required as the Custodian Agreement is on arm's length terms;
- e) risks associated with the related party arrangement – the key risk with the Responsible Entity and the Custodian being related parties is, because of their relationship, the Responsible Entity may fail to sufficiently monitor and review the Custodian's performance and compliance with its obligations under the Custodian Agreement to the detriment of investors; and
- f) details of the policies and procedures the Responsible Entity has in place for entering into related party transactions, including how compliance with these policies and procedures is monitored – all counterparty agreements, including related party transactions, must be approved by the Responsible Entity's Board. A review of the Custodian Agreement is undertaken at least annually and reported to the Board.

#### **Privacy**

Investors provide Burrell Securities with personal information when investing in the Fund and we deal with this information in accordance with our privacy policy.

When you provide instructions to Burrell Securities or its service providers or delegates, Burrell Securities and its service providers or delegates will be collecting personal information about you. This information is needed to facilitate, administer and manage your



investment, and to comply with Australian taxation laws and other laws and regulations. Otherwise, your application may not be processed or Burrell Securities and its service providers or delegates will not be able to administer or manage your investment.

The information that you provide may be disclosed to certain organisations or bodies situated in Australia or overseas, including service providers or business associates who provide services and financing in connection with our products and services and business functions and activities that may include:

- the ATO, AUSTRAC and other government or regulatory bodies;
- your broker, financial adviser or adviser dealer group, their service providers and any joint holder of an investment;
- organisations involved in providing, administering and managing the Fund, the administrator, custodian, auditors, or those that provide mailing or printing services;
- those where you have consented to the disclosure and as required by law.

Burrell Securities may disclose privacy information to parties outside Australia per our Privacy Policy. It is likely such parties will be located in countries such as the United States of America, United Kingdom, Singapore, Canada, Switzerland, New Zealand, Malaysia and Luxembourg. Burrell Securities may from time to time provide you with direct marketing and/or educational material about products and services Burrell Securities believes may be of interest to you. Should you not wish to receive this information from Burrell Securities (including by email or electronic communication), you have the right to “opt out” by advising Burrell Securities by telephoning 07 3006 7200, or alternatively by contacting Burrell Securities at [info@burrell.com.au](mailto:info@burrell.com.au).

Subject to some exceptions allowed by law, you can ask for access to your personal information. We will give you reasons if we deny you access to this information. The Burrell Securities Privacy Policy outlines how you can request to access and seek the correction of your personal information. The Burrell Securities Privacy Policy is available at [www.burrell.com.au](http://www.burrell.com.au) and can be obtained by contacting Burrell Securities’ Privacy Officer on 1300 4287 7355, or alternatively by contacting us via email at [info@burrell.com.au](mailto:info@burrell.com.au).

Burrell Securities’ Privacy Policy contains information about how you can make a complaint if you think Burrell Securities has breached your privacy and how Burrell Securities will deal with your complaint.

You should refer to the Burrell Securities Privacy Policy for more detail about the personal information that Burrell Securities collects and how Burrell Securities collects, uses and discloses your personal information.

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

Australia’s Anti-Money Laundering and Counter Terrorism Financing (‘AML/CTF’) laws require Burrell Securities to adopt and maintain an Anti-Money Laundering and Counter Terrorism Financing programme. A fundamental part of the AML/CTF programme is that Burrell Securities knows certain information about investors in the Fund. To meet this legal requirement, we need to collect certain identification information and documentation (‘Know Your Clients (‘KYC’) Documents’) from new investors. Existing investors may also be asked to provide KYC Documents as part of a re-identification process to comply with the AML/CTF laws.

Processing of applications or withdrawals will be delayed or refused if investors do not provide the KYC Documents when requested. Under the AML/CTF laws, Burrell Securities may be required to submit reports to AUSTRAC. This may include the disclosure of your personal information. Burrell Securities may not be able to tell you when this occurs and, as a result, AUSTRAC may require Burrell Securities to deny you (on a temporary or permanent basis) access to your investment. This could result in loss of the capital invested, or you may experience significant delays when you wish to transact on your investment. Burrell Securities is not liable for any loss you may suffer because of compliance with the AML/CTF laws.

#### **US Tax Law Requirements**

The Fund is a Reporting Financial Institution under the Inter-Governmental Agreement between the Australian and US governments in relation to the Foreign Account Tax Compliance Act (‘FATCA’), a United States tax law that imposes certain due diligence and reporting obligations on foreign (non-US) financial institutions and other financial intermediaries, including the Fund, to prevent tax evasion by US citizens and US tax residents through the use of non-US domiciled investments or accounts. Penalties can apply if investors provide false information.

To comply with the requirements under this Act, Burrell Securities will collect certain additional information from investors and will be required to disclose such information to the ATO. The ATO will share information reported to it by Reporting Financial Institutions with the US Internal Revenue Service. For further information in relation to how our due diligence and reporting obligations may affect you, please consult your tax adviser.

#### **Common Reporting Standard**

The Fund is a Reporting Financial Institution under the Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016 that implemented the OECD Common Reporting Standard (‘CRS’) in Australia, requiring Reporting Financial Institutions in Australia to report to the ATO details of their foreign investors from participating jurisdictions.

To comply with CRS, we are required to collect information from investors to identify if they are a tax resident of any other jurisdiction(s). For non-individual accounts, we are also required to identify the entity type and whether any controlling persons are foreign tax residents. Processing of applications or withdrawals will be delayed or refused if investors do not provide the required information when requested. Penalties can apply if investors provide false information.

The ATO will share information reported to it by Reporting Financial Institutions to tax authorities of jurisdictions that have signed the CRS Competent Authority Agreement.

For further information in relation to how our due diligence and reporting obligations may affect you, please consult your tax adviser.