

Unit Pricing Discretions Policy

June 2023



Pendal Fund Services Limited
ABN 13 161 249 332,
AFSL No 431426 (**PFSL**)

General Information

GENERAL INFORMATION	
Policy owner	Investment Operations and Trading
Policy location	Pendal intranet: Risk & Compliance - Other Policies
Date Issued	June 2023
Supersedes	May 2022
Review Cycle	<p>On an annual basis Pendal's Policy Register is reviewed and each policy is assessed for the following risk triggers:</p> <ol style="list-style-type: none">1. Change in regulatory focus or legislation;2. Material change to business practices or number or related incidents;3. ASIC hot topic areas. <p>If one of the above triggers occurs then a review is required that year, if not, it is proposed that a three-year review cycle is applied for that policy. For policies where regulation or specific legislation requires that an annual review is conducted an annual review will remain.</p>
Next review date	June 2024
Classification	Internal only
Business Scope	Pendal Australia

Contents

Contents	3
1 Purpose and Application	4
2 Regulatory Requirements and Industry Standards.....	4
3 Use of third parties.....	4
4 Discretions	4
4.1 Transaction Costs	5
4.2 Cut Off Times	5
4.3 Rounding	5
4.4 Timing and calculation of assets and liabilities and calculating unit price	5
4.5 Valuation Methods	6
4.6 Fees and Expenses	6
4.7 Allocation of assets and liabilities, revenue and expenses across classes of units.....	7
5 Suspending withdrawals.....	7
6 Backdating unit prices.....	7
7 No documented Policy or departure from this Policy.....	8
8 Unit Pricing Errors.....	8
9 Record Keeping	8
10 Reasonable exercise of discretion.....	8
11 Variations to this Policy.....	8
12 Updating the Policy	9

Unit Pricing Discretions Policy

1 Purpose and Application

Pendal Funds Services Limited (**Pendal**) is the responsible entity of various registered managed investment schemes (**Funds**). The Unit Pricing Discretions Policy (**Policy**) sets out the guidelines and principles in relation to how Pendal will exercise the discretions allowed under the constitution of each Fund in relation to the application and withdrawal price of units.

This Policy has been prepared for the purposes of compliance with ASIC Class Order 05/26, for Funds registered before 1 October 2013, and ASIC Class Order 13/655 (and associated Class Orders, including ASIC Class Order 13/657), for Funds registered after 30 September 2013 (ASIC Orders).

This Policy is not a complete description of all matters affecting unit prices and should be read along with the Product Disclosure Statement (**PDS**), the constitution for the relevant Fund (**Constitution**) and other Pendal policies, standards and procedures including but not limited to the Outsourcing Policy, Conflicts of Interest Policy and the Records Management Policy.

2 Regulatory Requirements and Industry Standards

- ASIC Class Order 05/26, for Funds registered before 1 October 2013
- ASIC Class Order 13/655 (and associated Class Orders, including ASIC Class Order 13/657), for Funds registered after 30 September 2013
- ASIC RG 94: Unit Pricing: Guide to good practice

3 Use of third parties

Whilst Pendal outsources all of the functional elements of the unit pricing process to third party service providers, Pendal, as responsible entity of the Funds, retains ultimate responsibility for ensuring that unit prices are determined appropriately and that assets are valued appropriately. To this end, Pendal has in place appropriate monitoring processes in relation to both the service providers and the unit pricing function.

4 Discretions

The following discretions may be exercised in calculating the application and withdrawal price of units for each Fund:

- Estimating an allowance for Transaction Costs (defined below)
- Determining the time at which unit prices are calculated
- Rounding unit prices
- Determining the timing of valuation of assets and liabilities and unit price calculations
- Determining a valuation method
- Allocating assets, liabilities, revenue and expenses between classes of units

- Fees
- Determining entry & exit fees
- Management Fees - Fees Accrual
- Performance Fees.

4.1 Transaction Costs

In most cases the constitution of a Fund provides that the application and withdrawal price of a unit may be increased by a Transaction Cost allowance (the buy/sell spread). **Transaction Costs** are Pandal's estimate of the total transaction cost that the Fund would incur to buy more assets for the Fund in the case of an application or to sell the required assets in the event of a withdrawal. These Transaction Costs are allocated when an investor buys or sells units in a Fund. This process is intended to ensure that other unit holders do not pay the Transaction Costs associated with a particular investor buying or selling units in a Fund.

The amount of the Transaction Costs is based on an estimate of the costs incurred historically on transactions for the Funds, as well as Pandal's experience in buying or selling similar assets.

In some cases where no or lower Transaction Costs are incurred because there is reduced trading or no trading of underlying assets (for example where an application or withdrawal request is funded by an in-specie transfer of assets), Pandal may waive or reduce the buy/sell spread.

Pandal believes that exercising its discretions in this way is reasonable because it ensures that existing unit holders are not unfairly or unreasonably advantaged or disadvantaged by the incoming/outgoing unit holder.

4.2 Cut Off Times

Pandal may determine a cut-off time for each Fund for applications and withdrawals which in turn determines the entry/exit prices that will apply to a particular application or withdrawal. All applications/withdrawals deemed effective for a particular day receive the unit price effective for that day. Pandal has discretion to amend cut-off times if it deems it necessary, for example to allow sufficient time for the processing of applications and withdrawals, however, it is expected this would only occur in unusual and rare circumstances.

Pandal believes that exercising its discretions in this way is reasonable because it ensures that investors are able to apply for or withdraw units at prices that reflect the reasonably current market valuations.

4.3 Rounding

Pandal is permitted to round unit prices under each Constitution. Unit prices are generally rounded to 4 decimal places for all Funds.

Pandal believes that exercising its discretions in this way is reasonable as it is consistent with industry standard practice and ensures a high degree of unit pricing accuracy.

4.4 Timing and calculation of assets and liabilities and calculating unit price

Pandal has discretion under a Fund's Constitution to determine when the Fund's assets (and liabilities) are valued. Pandal has exercised its discretion to determine that the assets will generally be valued on a daily basis (except for Funds with monthly valuations for which the timing of the valuation is specified in either the Constitution or the PDS) based on the end of business day market values and prices available for those assets. Pandal may utilise its discretion to value investments on an intra-day basis in unusual circumstances such as extreme market volatility.

For some investments held by the Funds, an up-to-date value for certain assets may not be available at the end of a business day. For these assets, Pandal may use the most recently obtained value, or may adjust that value by reference to comparable investments or movements in market indices or other factors.

Pandal has discretion, in certain circumstances, to suspend the valuation of assets (for example where Pandal determines that the value of a Fund's assets cannot reliably be calculated and to process transactions would unfairly advantage/disadvantage some unit holders).

Pandal also has discretion under a Fund's Constitution to determine when unit prices are calculated. Pandal has exercised its discretion to determine that the unit price of each Fund will generally be calculated on a daily basis, with the exception of some Funds for which the unit price is calculated monthly due to the nature of the assets held by these funds. In conjunction with this, Pandal also has discretion, in certain circumstances, to suspend the unit prices.

Pandal believes that exercising its discretions in this way is reasonable because it ensures that valuations are carried out as frequently as is necessary to ensure that units are priced accurately and result in equality and fairness between new and established investors.

4.5 Valuation Methods

In valuing the assets of each Fund, Pandal uses the most recent market prices available at the time at which it carries out the valuation. Where market prices are not available such as instances where the asset is not traded on the market, Pandal will calculate the value of the asset using the best information available to it such as referencing comparable investments. Pandal may employ independent valuers or sources of information in determining these prices. For example, for delisted, suspended or stale prices it may be necessary for the Pandal Valuation Committee to determine whether or not an independent valuation agent should be engaged.

In valuing the assets and liabilities of each Fund, Pandal applies valuation practices which are consistent with ordinary commercial practice and industry standards for valuing the relevant kinds of assets and liabilities. Where a liability is payable over an extended period of time, Pandal may make provision for the value of the liability and adjust the unit price of the relevant Fund to reflect this provision. Liabilities affecting more than one Fund are apportioned by Pandal equitably amongst the affected Funds.

Pandal believes that exercising its discretions in this way is fair and equitable as it ensures to a practicable extent that a just value is attributed to the assets of each Fund and that investments are valued consistently and fairly between Funds and in different pricing periods.

4.6 Fees and Expenses

Pandal may determine the time and amount of fees in accordance with the relevant Constitution and PDS. Pandal believes that exercising its discretions in this way is reasonable because it ensures fees and expenses are consistent with the relevant Constitution and that fees and expenses are fairly allocated to the Funds and equitably apportioned between unitholders in those Funds.

Entry & exit fees

The Constitution generally provides for a maximum entry or exit fee and Pandal generally charges a lower fee than the maximum. The applicable fees are set out in the PDS.

Pandal may also vary or waive entry or exit fees for specific investors where permitted under ASIC and other regulatory policy and legal requirements.

Entry and exit fees, including any variation or waiver of those fees are charged outside the relevant Fund and do not affect unit prices of that Fund.

Management Fees

Management fees are charged for each Fund within the range specified in the Constitution and accrue in the unit price on a daily basis. The applicable fee will be set out in the PDS.

Pendal may also vary or waive management fees for specific investors where permitted under ASIC and other regulatory policy and legal requirements. If management fees are varied or waived, this occurs outside the relevant Fund and does not affect the unit price.

Performance Fees

Where performance fees are charged they are calculated and accrued in the unit price on a daily basis. Performance fees are generally payable only if the performance of the Fund has exceeded the agreed performance hurdle set out in the Constitution or PDS. Any applicable performance fee and the way in which they are calculated will be set out in the PDS.

Pendal may exercise its discretion to vary or waive performance fees for specific investors where permitted under ASIC and other regulatory policy and legal requirements. If performance fees are varied or waived, this occurs outside the relevant Fund and does not affect the unit price.

Expenses

Unless the PDS for the relevant Fund states that Pendal will meet the expenses of the Fund from its management fee, Pendal will recover from the relevant Fund the expenses of administering and investing the assets of the Fund. Expenses are apportioned between Funds based on the actual expenses incurred relating to that specific Fund. Where Fund expenses are not attributable to one particular Fund, they are apportioned on an equitable basis.

Where the fees for a Fund are stated in its PDS to be inclusive of expenses, or where the Constitution limits the expenses that the Fund can incur, Pendal will bear the cost of any expenses which arise and exceed these amounts.

4.7 Allocation of assets and liabilities, revenue and expenses across classes of units

Where a Fund has issued more than one class of units, Pendal may exercise its discretion over the allocation of assets, liabilities, revenues and expenses to the classes, as set out below:

- Where the Fund has more than one class of units, but the same fees and expenses are applicable to each class, fees and expenses are allocated equally to all units, irrespective of class.
- Where the Fund has more than one class of units with different fees and expenses, the Fund's assets, liabilities and investment income are allocated to each class proportionally based on the size of each class.

Pendal believes that exercising its discretions in this way is reasonable as it ensures that assets, liabilities, revenues and expenses of the Fund are allocated fairly between the classes.

5 Suspending withdrawals

In some circumstances (for example a significant disruption to financial markets or where large numbers/values of redemption requests have been received), Pendal may exercise its discretion to suspend the ability of investors to withdraw from a Fund following the approval of the Board of Pendal. In circumstances such as these, unit prices will generally not be available and the withdrawal price applicable to any withdrawal received during the suspension will be determined at the next valuation time after the suspension is lifted.

6 Backdating unit prices

Backdating occurs when the unit price given to a transaction is different to the most current unit price. Backdating can occur as a result of extended processing turnaround times, processing errors and after distribution periods.

Pendal may backdate transactions, where necessary, to ensure transacting investors receive appropriate value for the effective date of their application or withdrawal requests (including switch requests). As prices differ between the effective date and processing date, the backdating of transactions may have a positive or negative impact on the Fund. Impacts of backdating are borne by the Fund, thereby potentially impacting non-transacting investors. Pendal monitors the backdating transactions daily.

During a distribution period, unit prices cannot be accurately determined until the distribution is completed and an ex-distribution price is issued. Consequently, transactions are backdated once catchup unit pricing is available to ensure these transactions receive the correct value.

7 No documented Policy or departure from this Policy

Where Pendal exercises a discretion:

- in relation to which Pendal has no documented policy or
- in a way that involves departure from this Policy,

Pendal will retain records containing details of the exercise of the discretion including:

- the date on which the discretion is exercised;
- who is the nominee or person making the decision;
- how the discretion is exercised;
- an explanation of why it was reasonable to exercise the discretion the way it was exercised; and
- if the discretion was not exercised in a way which was consistent with scheme property being value, or the market price of interests being worked out, in accordance with ordinary commercial practice - an explanation why it was impracticable to do so.

8 Unit Pricing Errors

In circumstances where unit pricing errors have been identified, Pendal has an established policies and procedures in place with regard to rectifying such errors. These policies and procedures take into account the relevant standards and guidance notes including RG94: 'Unit Pricing Guide to Good Practice'.

9 Record Keeping

Pendal will retain records for seven years which document the exercise of a discretion where there is no documented policy or in a way that involves a departure from this Policy. All investors in a Fund may obtain copies of the documents at no charge.

10 Reasonable exercise of discretion

Pendal must act reasonably in exercise any of the discretions set out in this Policy.

11 Variations to this Policy

Pendal may vary or replace any term of this Policy in relation to a Fund without prior notice to investors. Where the variation is material, Pendal may notify investors of the variation in writing or through its investor website.

12 Updating the Policy

The Policy is generally reviewed on an annual basis and may be updated from time to time to ensure that it remains relevant, current and compliant with all applicable laws, standards and guidance notes.

For more information contact the Fund Accounting Team

PENDAL

This document contains Company confidential and proprietary information. Once printed, this document becomes an uncontrolled copy and is current as at the date of printing. Version control and quality control cannot be guaranteed once downloaded. For the most up to date version, please refer to the Pendal.