Responsible Investment Policy
July 2021

Putting Wealth To Work For Generations
## Contents

1. Introduction 3
2. Definitions 4
3. Our beliefs 4
4. Our approach 5
5. The four pillars 6
6. JBWere – your partner for investing responsibly 10
7. Appendix 1  
   “Identify” – ESG integration approach by asset class 11
   Equities 11
   Fixed Income 12
   Alternative Investments and Managed Research 12
8. About the authors 13
Introduction

JBWere is one of Australia and New Zealand’s leading private wealth managers. Driven by our desire to be a world-class steward of capital, JBWere is leading the way to publish our Responsible Investment approach and framework.

Responsible investing is no longer a niche way to invest but the new normal in global investing. This fundamental shift is driven both by the search for returns and/or as a desire by clients to have their capital invested in line with their values and principles. Responsible Investing (RI) is not a new way of investing, with the first socially responsible mutual fund launching in the USA in 1971. RI is growing at an ever-increasing rate, with continuous development in norms, guidelines and definitions.

JBWere’s mission is to give our clients the confidence to do what matters. What matters to an increasing number of our clients is the ability to invest for a dual goal: performance and purpose.

From a performance perspective, there is a growing recognition across academia and the wider financial industry that Environmental, Social and Governance (ESG) factors influence investment returns and that integrating ESG factors into investment analysis and decisions, can help better manage risk and improve returns. An analysis of over 2,000 academic studies on how ESG factors affect corporate financial performance found “an overwhelming share of positive results” with just one out of 10 showing a negative relationship.

More than solely for performance, our clients are seeking to invest for purpose and in alignment with their values, expecting to invest in a way that, at minimum, does no harm, and ideally positively contributes to society and the environment.

As one of Australia and New Zealand’s largest stewards of private client capital we recognise both the privilege and importance of the role we play in this rapidly evolving RI market. The purpose of this policy is to outline for JBWere Australia:

- our definition of RI;
- our beliefs;
- our framework and approach to investing responsibly; and
- our commitment, pathway and aspiration to provide clients the leading private wealth solution in Australia and New Zealand.

1 PRI 2020 https://www.unpri.org/an-introduction-to-responsible-investment/what-is-responsible-investment/4780.article
Definitions

RI is an ever-evolving market with a unique set of language and terminology. At JBWere, RI is a broad umbrella term, covering a range of approaches including:

• the integration of ESG factors;
• stewardship of capital;
• impact investing; and
• ethical and values-based investing.

Our beliefs

Our RI policy is built on the following beliefs:

• We recognise and respect that each client is unique, and it is the right of our clients to have the opportunity to reflect their individual ethics, principles and values within their investment portfolios.
• Our role is to provide insights into exposures, and related existing and potential ESG risks and opportunities, to enable our clients to make informed investment decisions aligned to their principles and values.
• The main objective of ESG integration remains financial performance, recognising ESG may assist to improve risk adjusted returns, particularly over the long term, and is a key investment risk factor.
• ESG risks and opportunities span all asset classes, and as such it is imperative ESG integration is applied across all investments offered by JBWere.
• We are a steward of our clients’ capital and have a responsibility to engage with companies and fund managers to both represent and protect our clients’ interests.
• Active ownership through stewardship, engagement and advocacy across asset classes can drive improved investment outcomes, particularly over the long term, and better align investor and manager interests.
• We take both an asset class and cause-agnostic approach to impact investing. Clear measurement, monitoring and reporting of the impact is a critical component of an impact investment classification.
Our approach

Our approach to investing responsibly is illustrated below:

Our framework represents the full scope of RI as defined by JBWere, spanning ESG integration, stewardship of client capital, impact investing, and ethical filters and alignment. Collectively, these pillars align to global best practice in private wealth and are reflective of RI as defined by the Global Sustainable Investment Alliance (GSIA). Our approach is a progression, commencing with the value JBWere delivers in RI to our clients through research, insights and advocacy, through to the importance of the client being able to reflect their individual values in their portfolios.

JBWere has a Responsible Investing framework which comprises four main pillars:

1. We use our research and expertise to (1) Identify and provide insight into ESG risks and opportunities across the full range of asset classes and related investments to help our clients make more informed investment decisions. ESG analysis is also integrated into our client model portfolios.
2. We aim to use our ESG insights to positively (2) Influence company and fund manager behaviour, and outcomes on behalf of our clients, through continuing to develop an approach to stewardship, engagement and advocacy.
3. For clients looking beyond ESG integration, JBWere also offers investing for (3) Impact with clear and measurable social or environmental outcomes. This is a small but rapidly growing investment segment.
4. And finally, clients can (4) Individualise their portfolios through positive inclusions or negative exclusions aligned to their unique ethics, principles and values using leading insights from both our Australian Investment Strategy Group (ISG) and specialist local and global partners.

These four pillars are explained in further detail below.
The four pillars

**Identify**

The foundation of our RI framework is built on ESG analysis and integration, where the main objective of ESG integration remains financial performance to drive long term, risk adjusted returns. As the first pillar in our framework, we **identify** the ESG risks and opportunities associated with every investment, regardless of asset class or access format. In short, ESG focuses on the ‘how’ – that is, how companies and fund managers do what they do.

ESG refers to the practices of an investment, such as a company or a fund, that may have a material impact on the performance of that investment. ESG factors are non-financial considerations that are important for stakeholders to keep in mind when assessing a company’s future performance and can be used both to mitigate risk and unlock opportunities in an investment portfolio. The integration of ESG factors is used to enhance traditional financial analysis by identifying potential risks and opportunities beyond technical valuations.

The purpose of **identify** is to provide insight and analysis on an investment’s ESG credentials so that our clients can:

- understand to a greater degree the ESG risks and opportunities associated with each investment currently within their portfolio
- assess future investments based on the ESG analysis which is applied to every investment offered, and
- where appropriate, use this ESG risk identification information to make proactive investment decisions in alignment with their individual principles, ethics and values (which is further explained in pillar **individualise**).

Please see Appendix 1 for detail on how ESG is integrated across asset classes.

**Environmental**

Issues relating to the quality and functioning of the natural environment and natural systems, e.g. carbon emissions, climate change, sustainability, renewable energy, environmental regulations, water stress and waste.

**Social**

Issues relating to the rights, wellbeing and interests of people and communities, e.g. labour management, human rights, consumer protection, welfare, and health & safety.

**Governance**

Issues relating to the management and oversight of companies and other investee entities, e.g. employee relations, compensation, board composition, and ownership structure.

“ESG factors are non-financial considerations that are important for stakeholders to keep in mind when assessing a company’s future performance.”
Influence

Our second pillar, **(2) Influence**, is best summarised as our approach to stewardship of client capital. This pillar represents a logical progression in our RI framework to utilise our deep ESG insights from **(1) Identify**, with an aim to engage and advocate with companies and funds and drive positive outcomes and returns for our clients, and in fact, all shareholders. As stewards of our clients’ assets, we believe JBWere has an important role to play to ensure companies and fund managers are focused on responsible allocation of capital and long-term value creation, and that our clients’ interests are both represented and protected.

Our approach to stewardship stems from our belief that company management, directors, fund managers, and investors all have critical yet unique roles. We believe that the proper consideration of relevant ESG matters affects the long-term sustainable performance of companies and funds, and benefits the investors of those companies and funds. This is supported by research, such as Principles of Responsible Investment (PRI) commissioned research, indicating that engaging with companies on ESG issues can create value for both investors and companies, by encouraging better ESG risk management and more sustainable business practices.²

We are committed to developing our Influence pillar further through:

- seeking to understand the ESG issues that impact companies and funds in which we are invested;
- continuing to develop and formalise our advocacy approach;
- encouraging companies and fund managers to align with best practice on ESG issues through constructive dialogue and engagement;
- working towards implementing a comprehensive and effective way of leveraging our clients’ investor rights to push for desired outcomes;
- aligning to key local and global RI legislation (such as the Modern Slavery Act) and pledges aligned to our client’s best interests (such as the Tobacco Free Pledge); and
- advocating for consistency and global best practice in measuring, monitoring and reporting of RI implementation across asset classes.

JBWere has a long history of successfully advocating for positive change with companies and fund managers and are committed to proactively expanding and formalising our stewardship of capital approach. We aspire to be a leader in private wealth advocacy and stewardship of capital in Australia and New Zealand through further developing and enhancing our voting policies across asset classes, formalising our engagement processes, and most importantly proactively providing a voice in the market on behalf of our clients.

² PRI 2020. [https://www.unpri.org/an-introduction-to-responsible-investment/what-is-responsible-investment/4780.article](https://www.unpri.org/an-introduction-to-responsible-investment/what-is-responsible-investment/4780.article)
Impact

(3) Impact forms our third pillar of our responsible investment approach and represents a small but rapidly growing segment of RI. In short, the focus of impact investing is looking at the ‘what’ – i.e. what it is that companies and fund managers do. Impact investing is investing with the intention to generate positive, measurable social and environmental impact alongside financial return. Whilst ESG integration (pillar (1) Identify above) aims to identify, manage and mitigate factors that will affect company performance, ‘impact investments’ aim to deliver demonstrable environmental or social outcomes in addition to a financial return.

Impact investments can be both local and global in nature, span all asset classes, and target a range of returns from below market to market rate, depending on the investors’ strategic goals. Impact investing is distinct from philanthropy as it is focused on achieving financial return in addition to positive social and environmental change.

The global impact investment market is estimated to be USD 502bn, compared with the more than USD 100tr of the world’s total financial stock – a relatively small, but emerging segment. It can be a powerful strategy for investors to direct capital towards positive economic, social and environmental outcomes. In Australia, the total value of impact investment products that are widely offered to Australian investors as at 31 December 2019 is AUD 19.9bn, of which AUD 8bn is foreign domiciled products. This is a rise of almost 250% over a two-year period, with the split of onshore versus offshore product reflective of the nascent but rapidly evolving local impact investment market.

JBWere has been an important contributor and supporter of the impact investment movement, having co-authored the foundation research report, Impact Investment in Australia, with the Federal Government in 2014. We are committed to advancing the impact investing market, particularly across Australia and New Zealand. The impact investment market faces some systemic scale barriers, and beyond enabling access to impact investment for clients, we believe our firm has a broader role to contribute to research and education for the sector, and to advocate for greater consistency and reporting capability through proactive engagement with companies, fund managers and RI industry bodies.

JBWere does not focus on one impact investment cause, theme or Sustainable Development Goal (SDG) over another. Our role is to provide clients guidance and access to impact investment opportunities – empowering our clients to choose quality impact opportunities that are appropriate, suitable and best align with their individual values. Impact investments will be selected according to our asset class investment processes, with a preference for investments that generate a market level return, with an eye to sufficient scale and diversification, and alignment to globally recognised impact reporting frameworks, such as the SDGs – see diagram 1 below.

We consider impact to be a lens, and as such impact investments may appear in any asset class, and in a variety of formats. However, due to the structure of the impact investment market and the nature of impact investing globally, it is common for impact investments to be more accessible through a fund format, where the fund manager clearly manages, measures and reports on the targeted and specified impact. JBWere’s range of impact investments are identified on our Approved Product List.

Diagram 1 – United Nations Sustainable Development Goals (SDGs)

Source: United Nations

1 2019 Annual Impact Investor Survey, Global Impact Investing Network (GIIN)
4 Responsible Investment Association Australasia (RIAA) 2018 Benchmarking Impact report.
Individualise

At JBWere we understand that no two clients are the same. Each client has their own unique set of principles, ethics and values, which can change and evolve over time and through generations. Our fourth pillar, **Individualise**, enables our clients, if they so choose, to align their investments with their values, in effect applying filters to:

- **Negatively** screen out, exclude or limit exposure to certain investments and/or exposures (e.g. tobacco, weaponry/arms, pornography, alcohol, gambling). Negative screening is the oldest and most common way Australian investors look to invest responsibly⁵, integrating their values into a portfolio.

- **Positively** screen in, include or purposefully overweight certain investments and/or exposures. For example, investments with low carbon footprint or a particular sector/cause that is meaningful to the client (e.g. renewable energy). This is distinctly different to impact investing, which is associated with additional and targeted monitoring, measuring and reporting of social and environmental impact.

Our Advisers can assist clients to individualise their portfolios to align to their personal values, principles and ethics, by using a combination of:

- **ISG ESG insights** provided on all investments across asset classes (including direct shares/bonds, managed investments and model portfolios) – as outlined in the **Identify** section above, and

- **Strategic partnerships** – with globally leading research platforms and associated tools to deliver best of breed research and align to international best practice. Examples of these partnerships include MSCI ESG Research Inc., a world leader in responsible investing analytics, and various partnerships with tier one global banks and research providers.

We recognise that not all investments globally or locally have a full and transparent data set available. This reflects the nascency of parts of the RI market, the nuanced nature of researching and rating investments across a wide range of asset classes, and the complexity associated with reviewing more structured investments. Our aspiration is for full client portfolio customisation and associated data transparency. JBWere will continue to work closely with key RI stakeholders (such as fund managers, companies, platform providers, academics, research houses and industry bodies) to play our role in the expansion and development of the RI market both locally and globally.

⁵ GSIA Trends Report 2018
Governance and reporting

This policy has been created as a joint initiative between ISG and our Philanthropic Services team, and led by our Head of Responsible Investing. Our policy is reviewed on an annual basis, with JBWere committed to continued evolution and alignment of our RI policy and approach to global RI private wealth best practice.

JBWere is a wholly-owned subsidiary of the National Australia Bank (NAB). JBWere’s Managing Conflicts of Interest and Maintaining the Integrity of Research Policy sets out the measures we take to ensure the integrity of our research.

In addition to standard investment reporting outlined in our asset class investment process documents, we provide data transparency and input into NAB’s firm wide sustainability and key legislation reporting requirements, such as the Modern Slavery Act, Human Rights Act and Tobacco Free Pledge. JBWere is also represented on NAB’s sustainability committee as an expert and advocate for RI investment expansion across the Group. JBWere is a proud member of Responsible Investment Association Australasia (RIAA) and will continue to work with local and global industry bodies to evolve reporting in relation to investing responsibly.

JBWere – your partner for investing responsibly

JBWere is a leading wealth management firm in Australia and New Zealand, providing a wide range of investment, advisory, financing, securities, asset and wealth management services to a substantial and diversified client base. Since 1840, JBWere has been delivering world-class investment advice across individuals, families, and our ‘for purpose’ clients. JBWere is a leader in RI in private wealth across Australian and New Zealand demonstrated through a long history of high-quality RI insights and thought leadership, investment research, and advocacy.

Our views and insights have been formed as the partner of choice for families, organisations and institutions driven by purpose. We currently advise on AUD 68.6bn6 for a wide range of clients across Australia and New Zealand and have deep experience and expertise in tailoring portfolios to ensure an alignment of invested capital, values, ethics and purpose.

To find out more about how you can invest for performance and purpose please visit our website www.jbwere.com.au, contact your JBWere Adviser or email Responsible.Investing@jbwere.com.

6 As at 30 June 2021
Appendix 1

“Identify” – ESG integration approach by asset class
JBWere broadly splits investments into three main asset classes: Equities, Fixed Income and Alternative Investments. These align to our Strategic Asset Allocation (SAA) as outlined below:

<table>
<thead>
<tr>
<th>SAA</th>
<th>Alignment to JBWere asset class teams</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>Fixed Income + Managed Research</td>
</tr>
<tr>
<td>Government Bonds</td>
<td>Fixed Income + Managed Research</td>
</tr>
<tr>
<td>Credit</td>
<td>Fixed Income + Alternative Investments + Managed Research</td>
</tr>
<tr>
<td>Real Assets</td>
<td>Alternative Investments + Managed Research</td>
</tr>
<tr>
<td>Equities</td>
<td>Equities + Alternative Investments + Managed Research</td>
</tr>
<tr>
<td>Uncorrelated Strategies</td>
<td>Alternative Investments + Managed Research</td>
</tr>
</tbody>
</table>

For direct holdings (i.e. shares or bonds), which are client led, JBWere provide ESG insight via partnerships with global insights providers as outlined in (4) Individualise pillar on page 9.

JBWere’s true insight and value is clearly demonstrated in our ESG integration and approach to the selection of Funds across all asset classes and the construction of model portfolios. Our (1) Identify approach is led by our team of Australian investment professionals in ISG, representing one of the largest investment teams in a private wealth manager in Australia.

ISG undertakes ESG risks and opportunities identification and analysis, and is responsible for the integration of ESG analysis within every asset class’s investment process. Consistent with PRI guidelines, JBWere takes an asset class approach to ESG risk and opportunity identification as outlined below.

Equities

Overview
The Equities team within ISG is responsible for developing the firm’s equities strategy and the management of model portfolios in the Equities asset class.

Process
The Equities team’s investment philosophy is focused on the preservation and enhancement of capital with appropriate levels of risk. The team’s process includes a six-factor analysis of each company with ESG factors incorporated where appropriate. As well as its own views, the team utilises company reports/disclosures and various external sources, including MSCI’s ESG ratings, to help inform our analysis. Each of these factors is scored and forms part of the team’s proprietary assessment of risk for each individual issuer. To this end, ESG factors form part of the team’s assessment of the overall sustainability and long-term value of each company. Additionally we separately assess modern slavery risk and incorporate this analysis in our overall assessment of risk. The team’s valuation methodology utilises an assessment of quality and risk and adjusts the measure of returns available to the business in the longer term as a consequence of that assessment. In this way, ESG concerns and other risk metrics are explicitly captured into the team’s valuation and portfolio recommendations in a consistent manner.
Output
The team's investment process captures both our assessment of risk and reward for each given potential investment. Portfolio construction is then informed by a combination of macro factors and this risk/reward analysis. We take a holistic approach to risk in the portfolios such that the entire portfolio is assessed for not only ESG and modern slavery concerns including climate impact. Clients can see the output of this analysis in the JBWere equity model portfolios.

Fixed Income

Overview
The fixed income team within ISG is responsible for developing the firm's fixed income strategy, undertaking investment research and providing recommendations on all fixed income investments for the JBWere adviser network. The team is also responsible for the management of the model fixed income portfolios, as well as providing asset allocation and portfolio construction advice.

Process
The fixed income team's investment philosophy centres on the principles of capital preservation, value, and portfolio enhancement. More particularly, the preservation of capital is paramount and credit quality is first and foremost the team's focus to ensure capital is preserved and the receipt of scheduled distributions are realised. Moreover, the team firmly believes the expected return on a bond or credit instrument must compensate for the risk assumed and any addition to a portfolio must enhance the portfolio's attributes in terms of its level and quality of yield, diversity, liquidity, and defensive qualities.

ESG risk identification and the management of those risks is a critical element of the fixed income investment process as it serves as a leading indicator of the potential impact that unforeseen risks can have on specific sectors and issuers. To this end the fixed income team recognises the value of ESG factors in assessing the sustainability and long-term creditworthiness of debt issuers. In addition to its own views, the team utilises MSCI's ESG ratings as a screening tool to, as a minimum, identify issuers of concern. The team leverages the credit ratings and analysis of recognised rating agencies such as Standard & Poor's and Moody's on the basis that the level of ratings assigned to an issuer and its debt instruments captures the ESG risks associated with that issuer. It is noteworthy that the value of the analysis underpinning the credit ratings has been enhanced in more recent times as the agencies have moved to articulate in greater detail within their publications the ESG risks considered in assigning their ratings.

Output
The identification and assessment of the ESG factors relevant to a debt issuer feeds directly into any recommendation as to whether or not a JBWere client should buy, hold or sell a bond or hybrid issued by an issuer. In addition, the assessment of the ESG risks relevant to a particular debt issuer also has a direct bearing on the value assigned to any debt instrument of that issuer. Clients can see the output of this analysis in the individual security and tactical recommendations made by the fixed income team with respect to bespoke and discretionary client portfolios, in addition to the composition of JBWere's fixed income model portfolios.

Alternative Investments and Managed Research

Overview
The Alternative Investments team within ISG is responsible for sourcing, assessing and selecting funds aligned to the JBWere Alternative Investments strategy, comprising five sleeves: Private Equity, Private Debt, Real Assets (Infrastructure/Property), Renewables/Natural Resources, and Hedge Funds. Due to the nature of Alternative Investments, this asset class is accessible to JBWere clients via fund formats. In addition, Managed Research is a separate investment team within ISG and is responsible for sourcing, assessing and selecting funds and other listed securities across all asset classes. Given both teams implement through funds, a consistent approach to ESG risk and opportunity identification is applied.
Process

ESG is a key factor that has been integrated throughout both the Alternative Investments and Managed Research due diligence process, and is aligned to our investment beliefs. Broadly speaking, we adopt an internally developed three-tiered approach to ESG analysis underpinned by a detailed questionnaire:

1. **Firm Structure & Policy** – we assess whether the manager has been structured in a manner to consider ESG. This includes whether the manager has a clear and well-articulated ESG/Responsible Investment policy detailing its stewardship of capital, resources dedicated to ESG analysis, diversity within its investment team, and commitment to international ESG standards/practices. This framework also provides a basis for our own active engagement and advocacy on ESG factors with investment managers.

2. **ESG Integration and the Investment Process** – we assess whether the manager has incorporated ESG considerations into its investment process including negative/positive screens, ESG risk/opportunity analysis, valuation and portfolio construction.

3. **Monitoring & Reporting** – each asset class has unique and nuanced characteristics and therefore identification of ESG factors at this level differ. Data availability will also differ depending on the type of investment. Where available we make use of asset class specific tools and datasets to further assess whether a manager’s ESG approach translates to and is reflected in a strategy’s underlying portfolio holdings. We also assess whether the manager monitors, measures and reports to investors on ESG factors.

Output

A rating of positive, neutral or negative based on the output of the three-tiered approach is determined for each fund on the High Conviction List, with the justification behind the rating detailed in our due diligence documents. In addition, we also identify the relevant funds that meet JBWere’s criteria for being an “impact” fund. Regular reviews are undertaken of all funds in alignment with our investment process.

For further detail on our individual asset class investment processes outlined above, please visit: 
About the authors

Gillian Gordon

Head of Alternative Investments and Responsible Investing

Gillian joined JBWere in May 2019 to Head Alternative Investments, involving determining the future strategy for Alternative Investments in JBWere and expanding Alternative investment offerings across Private Equity, Private Debt, Real Assets including Infrastructure & Property, Renewables, Natural Resources and Hedge Funds. Gillian is also leading the further expansion of JBWere’s stewardship of capital and Responsible Investing (RI) strategy.

Prior to joining JBWere, Gillian held senior multi-asset global investment and structuring roles on trading floors, working across Europe, North America, Asia, Africa and the Middle East, within Standard Chartered Bank (SCB) and Bank of Montreal (BMO) Capital Markets.

Gillian’s roles have included leading sales and structuring for SCB’s Alternative Asset Group (AUM + USD 2bn) in London, in addition to leading and designing multi-asset investment solutions across Fixed Income, Equities, FX, Alternative Investments, Credit, Commodities and SRI for Institutional, Private Bank and High Net Worth clients.

Qualifications

• Bachelor of Business (Management), University of Queensland
• Bachelor of Commerce, University of Queensland
• Certified Practicing Accountant, (CPA) Australia
• Capital Markets Programme, Chartered Institute of Securities and Investments (CISI)
• UK Diploma of Investment Advice (Qualified UK Financial Adviser), Chartered Institute of Securities and Investments (CISI)

Shamal Dass

Head of Philanthropic Services and Family Advisory JBWere

Shamal joined JBWere in 2012 and leads the Philanthropic Services and Family Advisory business. In addition to leading these teams, his responsibilities include the provision of tailored advice to for-purpose organisations and private clients in areas ranging from the governance, leadership, capacity building, structuring, sustainability and organisational strategy.

Prior to joining JBWere, Shamal worked within the financial services and trustee industries gaining significant experience in advising high net worth individuals on their philanthropic structures, managing trusts and foundations (including PAFs), and constructing charitable foundation investment portfolios.

Shamal is an Adjunct Associate Professor at the Centre for Social Impact, University of NSW Business School. He co-created and co-teaches the Governance for Social Impact course at the Australian Graduate School of Management (AGSM). Shamal serves on a volunteer basis on a number of boards including Earthwatch Australia, Two Good Foundation, and Governance Group of The Constellation Project.

Qualifications

• Governing for Non-profit Excellence (Executive Education) – Harvard Business School
• Fellow of Finance – FINSIA (Financial Services Institute of Australia)
• Bachelor of Economics (1st Class Honours) – University of Sydney
Important notice

This document has been prepared by JBWere Limited (JBWere) and comprises general advice only. In preparing it, JBWere did not take into account your investment objectives, financial situation or particular needs ('financial circumstances'). Accordingly, before acting on any advice contained in this report, you should consider whether the advice is appropriate in light of your financial circumstances or contact your adviser. JBWere recommends that you obtain and consider the relevant Product Disclosure Statement or other disclosure document, where relevant, before deciding whether to acquire or to continue to hold any particular product mentioned in this report.

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In the last twelve months, JBWere has played a role in transactions for certain entities which may be referred to in this report. For details, refer to JBWere’s Deal Flow Participation.

Further information about the Conflicts of Interest related to research reports, and how JBWere maintains integrity of research, please refer to the Managing Conflicts of Interest and Maintaining the Integrity of Research Policy.

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