



Conflicts Management Policy

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1 Introduction

The purpose of this policy is to provide a consistent approach when managing conflicts of interest impacting DomaCom Limited and its related entities (“DomaCom”).

2 Regulatory Background

The provisions on ensuring that conflicts of interest are adequately managed are outlined in the Corporations Act 2001, s912A (1) (AA). ASIC’s Regulatory Guide 181 provides guidance that need to be considered in the management of conflicts in order to ultimately assist in providing financial services and products honestly and fairly as required by s912A (1) (a) and further, comply with numerous obligations which are also directly or incidentally related to this obligation.

3 Scope

This policy sets out a number of conflict examples and scenarios that could potentially impact DomaCom and includes reference to managing them. Please refer to Annexure A of this Policy.

This is not a comprehensive list of all conflicts that could impact DomaCom and all staff are encouraged to self-report to Compliance any conflicts of interest that may arise or come to their attention.

4 Policy Guidelines

This policy is relevant to managing, disclosing or avoiding conflicts of interest upon identifying any conflicts between the interests of Directors, DomaCom as the Group and also DomaCom in performing its obligations and responsibilities in respect of the DomaCom Fund. DomaCom is responsible for transactions (involving either the company or the DomaCom Fund) that may involve conflicts of interest. Self-reporting to Compliance, of any identified conflicts of interest, is encouraged in the first instance.

The Chief of Compliance and Risk Officer in conjunction with the COO and General Counsel will then independently assess and evaluate the conflicts and agree on implementing an appropriate action plan (e.g. controlling, disclosing or avoiding the conflict).

Conflicts brought to the attention of the Chief Compliance and Risk Officer, COO/CFO and General Counsel will be registered in the Conflicts Management Register. The Conflicts Management Register is maintained by the Compliance Department.

5 Adoption of policy

This policy was adopted by the Board on 15 June 2016.

Staff and Directors		
Type of Conflicts	Conflicts of interest and service which it relates	Processes in place to manage conflict
Board of Directors	<p>Between the interests of any Director and DomaCom.</p> <p>Between the interests of any Director and external Membership of a Board or Committee.</p>	<ul style="list-style-type: none"> • A standing monthly Board agenda is in place for Directors to disclose/declare Conflicts of Interest. • A Register of Directors' External Duties and Interests is maintained by the Company Secretary. • Directors are requested to leave the room should conflicts associated with their interests arise during any Board discussion. • All Board meetings are minuted accordingly.
Shareholders	Between the interests of Shareholders and DomaCom	<ul style="list-style-type: none"> • All Shareholder's share issues are recorded in a register and disclosed and resolved at each Board meeting. • All Board meetings are minuted accordingly.
Employees	<p>Between the interests of staff employees and their Family and Friends and DomaCom Limited.</p> <p>Between the interests of any staff member's relationship with another staff member of DomaCom.</p> <p>DomaCom staff members maintain roles outside of and in addition to DomaCom.</p>	<ul style="list-style-type: none"> • Adherence with Staff Trading Policy. • Staff agreements are in place that address conflicts management. Segregation of duties and layers of approvals in place to prevent fraud and error. • No DomaCom staff member may be employed by any third party without the approval of the Head of Compliance, COO and General Counsel.

Fund Management Industry

Type of Conflicts	Conflicts of interest and service which it relates	Processes in place to manage conflict
Insider trading in Fund Units	Conflicts relating to trading in Fund Units by individuals who have access to non-public (material and price sensitive) information about the company.	Adherence to Staff Trading Policy and Staff Code of Conduct.
Dealing and Making a Market - avoiding manipulation	Conflicts relating to manipulating the market or trading in Fund Units by individuals who have access to non-public (material and price sensitive) information about the company.	Adherence to Staff Trading Policy and Staff Code of Conduct.
Gifts and Hospitality	Conflicts as a result of gifts and entertainment offered by an external party with whom DomaCom interacts.	Adherence to Gifts and Hospitality Policy and Conflicted Remuneration Policy
Conflicted Remuneration	Conflicts relating to remuneration or benefits given by DomaCom to those persons who provide financial product advice to retail clients that could reasonably be expected to influence the financial product advice they give.	Adherence to Gifts and Hospitality Policy and Conflicted Remuneration Policy