



VMAPS

NON-ADVISED INVESTOR POLICY

Version 1.3 current as at June 2020

Ventura Investment Management Limited

ABN 49 092 375 258

AFSL 253 045



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Document Overview

Version	Approval Date (Board)	Effective Date	Policy Owner
1.0	01/09/2014	01/09/2014	Head of Operations
1.1	06/05/16	06/05/16	Head of Compliance and Risk Management
1.2	3 December 2018	3 December 2018	Head of Compliance and Risk Management
1.3	16 June 2020	16 June 2020	Head of Investment Services



Purpose

This policy describes how Ventura Investment Management Limited (**Ventura**), the Responsible Entity (**RE**) of Ventura Managed Accounts Portfolios (**VMAPS**), treats investors who do not receive financial advice (**Non-Advised Investor**).

Non-Advised Investors include new investors who apply to invest in VMAPS directly without a financial adviser, as well as existing investors who cease to continue to receive ongoing financial advice.

Scope

This policy applies to the treatment of:

1. New investor accounts
2. Existing investor accounts
3. Staff investor accounts

Legislative framework

Ventura has a legal obligation to act in the best interests of investors within VMAPS. This policy is designed to ensure that investors within VMAPS are treated in a fair and consistent manner in the absence of financial advice.

VMAPS is a complex transaction and reporting system designed to be operated by a licensed financial adviser on behalf of investors. As a complex system that requires specialist knowledge and user training to mitigate errors, Ventura considers it unlikely to be in the best interests of an investor to be able to transact within VMAPS without receiving ongoing financial advice.

Regulatory requirement	Description
RG 148 – <i>Platforms that are Managed Investment Schemes</i> and ASIC Class Order 13/762	RE's must have a written policy in place for dealing with investors without an adviser. The policy must be disclosed in the PDS and made available to investors free of charge.



Key Principles

Applications to invest in VMAPS must be received through a licensed financial adviser.

Investors in VMAPS can only transact on their account by providing instructions through a financial adviser, as VMAPS does not provide investors with transaction capabilities.

The RE may accept applications for VMAPS direct from Centrepoint staff, even if not submitted by a licensed financial adviser.

Non-Advised Investor Policy

Determining whether an Investor is a Non-Advised Investor

An investor may be considered a Non-Advised Investor under the following circumstances:

1. **Investor request:** An investor may notify Ventura that they no longer wish to retain the services of their financial adviser, and that adviser service fees should no longer apply to their account.
2. **Adviser request:** An adviser may cease the provision of ongoing financial advice to an investor as a result of:
 - a. Retirement without appointment of a new adviser;
 - b. Moving to another licensee, without the appointment of a new adviser to the investor;
 - c. Loss of contact with the investor; or
 - d. The adviser no longer wanting to provide advice and services to an investor without appointment of a new adviser.
3. **Licensee request:** A licensee may inform Ventura that an adviser is no longer an authorised representative or employee adviser of the that Licensee and a new adviser has not been appointed to the investor; and
4. **Other circumstances:** An adviser may no longer be authorised to provide advice to an Investor as a result of:
 - a. Cancellation of an adviser dealer group license;
 - b. ASIC notification that an adviser is unable or ineligible to provide financial services;
 - c. The adviser or their licensee are in breach of their licensee agreement with Ventura, and Ventura ceases its relationship with the adviser of the licensee; or
 - d. The adviser or their Licensee can no longer lawfully provide advice to the investor as a result of regulatory or compliance matters.

Staff of Centrepoint may invest in VMAPS directly without a financial adviser (**Staff Accounts**). Staff accounts will not be subject to the rules of Non-Advised Investor Accounts, however will be subject to Conflicts of Interest requirements.

Keeping records of Non-Advised Investors

Ventura will retain records of all investors determined to be Non-Advised Investors in the VMAPs Non-Advised Investors Register, noting:

- The relevant investor's name, contact details and VMAPs account number,
- The date and reason they became a Non-Advised Investor, and
- (if applicable) their former adviser's name and contact details.

Communicating with Non-Advised Investors

Where an investor becomes a Non-Advised Investor, Ventura will write to them informing them of the change, the impact on their account and their options. In these circumstances, Ventura may encourage investors to appoint an alternative financial adviser.

Ventura will not act on the following instructions received directly from a Non-Advised Investor:

1. Instructions to acquire investments;
2. Requests to participate in investment transactions; and
3. Instructions to switch between investment options.

Ventura will act on the following instructions received from Non-Advised Investor.

1. A signed withdrawal request, either in part or in full, where the account has sufficient liquidity to fulfill the withdrawal request.
2. A request to close the investor account, including transfer of assets out of the service.
3. A request to by the investor to cancel regular contributions to the account.

Regular withdrawal facilities will be maintained on the investor's account. Maintenance of these facilities may trigger minimum account liquidity processes. Regular withdrawals will be cancelled on request from the investors.

Non-Advised Investor portfolios will continue to be periodically rebalanced within VMAPS.

Fees and charges

Ventura will continue to deduct all fees except for Adviser Fees from Non-Advised Investor Accounts. These fees include, but are not limited to:

1. Administration Fees;
2. Investment Management Fees;
3. Brokerage; and
4. Recoverable expenses.

The Non-Advised Investor is responsible for ensuring that a sufficient balance is maintained within their cash account to pay fees associated with VMAPS. This may require additional cash contributions to be made to the account. Where insufficient cash is available within an account to pay for fees, VMAPS minimum liquidity processes will apply.



Appointment of a new financial adviser

Ventura is not responsible for the appointment of a new financial adviser to a Non-Advised Investor Account. The investor must notify Ventura in writing of the appointment of a new financial adviser, providing details of any adviser fees to be paid in relation to their account. The appointment of a new financial adviser is subject to the rules of the Licensee Agreements between Ventura and the Licensees.

Subject to regulatory obligations and disclosures, where a Non-Advised Investor does not select a replacement adviser, Ventura reserves the right to terminate the investor account on the provision of sixty (60) days' notice in writing to the investor and pay the balance of the account to the investor's bank account associated with their VMAPS Portfolio.

Online access and reporting

Non-Advised Investor accounts will continue to receive all regulatory communications in relation to their account and will continue to receive full online access to their portfolio reporting through VMAPS.

Procedures

Ventura will follow established adviser management procedures to ensure that adviser Investor relationships are appropriately managed.

Where Ventura or the Administrator receives a request in relation to a Non-Advised Investor Account, the following procedures will apply:

1. The request will be forwarded to an Administrator who is authorised to process changes to a Non-Advised Investor account;
2. The Administrator will remove all links between the Non-Advised Investor's account, and their previously nominated financial adviser to ensure:
 - a. The Investor is flagged as Non-Advised;
 - b. Adviser fees cease from the next payment date; and
 - c. Transactions within the Non-Advised Investor account are limited to those outlined within this Policy.
3. The Administrator will only provide the Investor with details about alternative licensees if requested by the Investor.



Roles and Responsibilities

Ventura Staff	<p>Understand and follow the policy for Non-Advised Investor</p> <p>Ensure the Policy is reflected in relevant guidelines and processes within their business area.</p> <p>Recognise the situations in which an Investor account becomes a Non-Advised Investor account</p> <p>Refer questions or concerns about the Policy to Ventura Management</p> <p>Keep records of all investors determined to be Non-Advised Investors in the VMAPs Non-Advised Investor Register</p>
VMAPS Administrator (Administrator)	<p>Receive requests from Investors, Financial Advisers or Licensees in relation to the treatment of investor accounts</p> <p>Provide requests to the appropriate administrator or administrative staff to take action to fulfill the request</p> <p>Follow established business procedures to communicate with the investor and to administer appropriate changes to the investor account (disassociate an adviser record; apply a new adviser record, or provide sufficient information for the investor to administer their account without an associated financial adviser).</p>
Ventura Management	<p>Allocate resources to ensure the appropriate management of Non-Advised Investor accounts.</p> <p>Review this policy and submit updates of the policy to RACC for approval by GARCC.</p>
Ventura Compliance Committee (VCC)	<p>Review updates to this policy and recommend approval to the Ventura Board</p>
Ventura Investment Managed Limited Board	<p>Approve updates of this policy</p>