

## Related Party Transactions Policy

### Introduction

This Policy has been developed for the Eureka Group (Eureka). Eureka includes Eureka Funds Management Holdings Pty Limited, (Parent Company) and its subsidiaries Eureka Funds Management Limited (EFML or AFS Licensee), Eureka Funds Management Administration Pty Limited, Eureka Funds Management Services Pty Limited, Eureka Treasury Pty Limited and Eureka Funds Management Investments Pty Limited.

Unless expressly stated in this policy, it applies to the Eureka.

Eureka Funds Management Limited is engaged in the business of;

- a) acting as responsible entity or trustee / manager for managed investment schemes,
- b) provision of general and real estate investment advice to wholesale clients / investors; and
- c) dealing in financial products on behalf of wholesale clients / investors.
- d) acting as asset manager, development manager, investment manager and investment advisor in relation to property investments

### Purpose

This document establishes the policy of the Eureka for Related party transactions.

### Review

This policy will be reviewed at least annually by the Board of Directors of Eureka Funds Management Limited and Eureka Funds Management Holdings Pty Ltd.

### Background

As the business develops, the Eureka Group will manage several property mandates / schemes simultaneously. Given the active management philosophy of Eureka, it is possible that transactions between two mandates / schemes managed by the Eureka may eventuate provided the transaction is in the best interests of both funds.

Eureka Group philosophy is to place the interest of the client / investor ahead of the business or its staff. The overriding principle therefore is for the director or the senior executive responsible for the management of a mandate / scheme to always act in the interest of the mandate / scheme and for there to be an appropriate independent overview, and transparency to clients, in respect of any related party property transaction.

## Policy

- Proposed related party transactions must comply with all governing documents. In the event that the governing documents do not specify the process of conducting a related party transaction, client disclosure is required at the outset.
- All related party transactions must obtain the unanimous approval of the Investment Committee and the Board of Eureka Funds Management Limited.
- Papers to the Investment Committee and the Board must clearly set out the process adopted including price determination, due diligence, valuation and documentation.
- Appropriate Chinese walls and documentary trail must be maintained to ensure that the transaction is an arms length deal. No individual staff member will be permitted to represent both the vendor and the purchaser in the case of a related party transaction.
- The Selling party must provide appropriate disclosure and information in accordance with industry practice to assist the buying party. The Buying party will conduct its own due diligence at its own cost.
- The parties may agree a process of price determination at the outset. This may involve separate valuations.
- All other process associated with the transaction must follow Eureka's processes associated with property transactions generally.

## Conflicts of Interest

- Refer to Eureka's policy on managing conflicts of interest.