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# Policy 4 – Communications

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## Signed by:

Director 1 – David Omond



Director 2 – Mario Papaleo



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## 1 Introduction

Placer Property Limited (PPL) holds an Australian Financial Services License (No. 442806).

PPL provides compliance services to the entities and stand alone trustee companies controlled by the directors of PPL.

PPL is committed to providing all stakeholders with accessible, accurate and timely information on the activities and performance of the funds of which it is the responsible entity. To achieve this PPL communicates regularly to its stakeholders through a range of methods.

This policy document sets out PPL's communication policy with its external stakeholders and other persons wishing to obtain information about PPL or the PPL funds.

The policy is to be read in conjunction with the Continuous Disclosure Policy.

## 2 Methods of communication

For PPL's Retail Funds, information will be communicated to stakeholders through the following ways:

- a. announcements and information on the PPL's website
- b. annual reporting
- c. email updates
- d. quarterly Fund updates
- e. presentations
- f. additional material posted in the mail periodically.

For PPL's Wholesale Funds, information will be communicated to Investors as specified in the Wholesale Fund documentation.

## 3 The website

One of PPL's main methods of communication for its Retail Funds is via its web site [www.placerproperty.com.au](http://www.placerproperty.com.au). The following information is made available on the PPL web site:

- a. annual and half yearly reports
- b. media releases
- c. announcements
- d. notices of meetings
- e. Product Disclosure Statements, current and closed
- f. presentations
- g. current net tangible asset backings per unit
- h. fund information
- i. Corporate Governance policies
- j. Board Charter.

## 4 General media releases/web updates

All information communicated to the media either written or oral and any updates to the PPL's Web site must first be approved by an Executive Director (including Joint Managing Director).

## 5 Media enquiries

All media enquiries, including requests for interviews are to be initially directed to the Joint Managing Director – Acquisitions and Public Relations.

## 6 Authorised spokesperson/s

PPL limits the number of persons authorised to speak on its behalf. Only the following people may speak on behalf of PPL;

- the Chairman
- one of the Executive Directors.

In the first instance comments are to be directed to the Joint Managing Director – Acquisitions and Public Relations.

The text of all speeches and addresses must be approved by an Executive Director and the Chairman.

## 7 Obligations of the Manager (PPL)

The Manager PPL is to ensure that:

- The Product Disclosure Statement (PDS) and marketing material comply with the Corporations Act and provide the Manager with the maximum due diligence protection and defence.
- The Manager complies with continuous disclosure obligations under the Corporations Act.
- The requirement for periodic reporting to Investors under the Corporations Act is complied with.

## 8 Procedures of the Manager (PPL)

- The Fund Manager and CFO Compliance Manager ensures that the PDS is prepared in accordance with a written due diligence program that facilitates stakeholder review and verification.
- The Fund Manager ensures the PDS is approved by PPL through the agreed Due Diligence Memorandum process.
- Marketing material is prepared in accordance with a program that facilitates stakeholder review and verification.
- Legal Counsel Council, and Joint Managing Director are to sign off on the PDS and marketing material and the Fund manager engages external advisers if necessary.
- The Fund Manager and CFO appropriate staff liaise with ASIC where required regarding the PDS and submits any required in use notices within time periods required by the Corporations Act.
- The PDS is to be approved by the Board prior to issue.
- The CFO Head of Investment Services ensures that the periodic statements provided to Investors are reviewed by stakeholders to ensure they contain the required information and do not contain any misleading or incorrect statements.