

CFS Edge Non-advised Investor Policy

April 2025



Purpose and scope

Avanteos Investments Limited ABN 20 096 259 979, AFSL 245531 (AIL, we, our, us) is the Trustee for Avanteos Superannuation Trust ABN 38 876 896 681 which includes CFS Edge Super and Pension and Colonial First State Investments Limited ABN 98 002 348 352, AFSL 232468 (CFSIL, we, our, us) as operator, administrator and custodian for CFS Edge Investments. CFS Edge is an investment platform that can administer shares, term deposits, unlisted investments, ETFs, managed funds, managed accounts (separately managed accounts and managed discretionary accounts), and other investment products and services within a single account. It also provides access to insurance options and sophisticated tax management facilities, so investors and their adviser can design a portfolio that suits their investment needs.

The CFS Edge Non-advised Investor Policy (Policy) outlines the changes to products and services when an investor/member (known in this document as "investor") decides not to retain an adviser or ceases to receive financial product advice from an adviser (known as "non-advised investors") or are expressly permitted by us as a direct client.

This Policy applies to both CFS Edge Investor Directed Portfolio Service (IDPS) investors and CFS Edge superannuation and pension fund members to ensure that clear and consistent policies and procedures apply to all non-advised investors. Non-advised investors can continue to hold existing accounts with us, however there will be changes to the processes and services provided. Information relating to non-advised investors is also included in the CFS Edge IDPS Guide or CFS Edge Super and Pension Product Disclosure Statement (PDS) (together, "Disclosure Documents"). A copy of this Policy and Disclosure Documents are available online at cfs.com.au/cfsedge or alternatively we can send a copy of the Policy free of charge upon request. Non-advised investors should contact the CFS Edge Service and Support team on 1300 769 619 for assistance if they no longer have an adviser.

Policy requirements

1. Becoming a non-advised investor

Investors will be a non-advised investor under any of these circumstances:

- An investor notifies us that they are no longer retaining the services of an authorised adviser;
- We become aware that an investor's adviser or the adviser's licensee group has ceased providing ongoing financial advice to them;
- A licensee group indicates to us that an investor's adviser is no longer their authorised representative and the investor has not appointed a new adviser;
- We become aware that an investor's adviser or the adviser's licensee group is no longer eligible to instruct us on behalf of the investor; or
- An investor is expressly permitted by us as a direct client.

There may be other circumstances where an investor may become a non-advised investor. When we become aware of an investor being non-advised, we will provide confirmation to them in writing.

Non-advised investors can retain their account with us, however, there will be changes to the services we provide to them, as they will no longer have an adviser who is actively managing or monitoring their account. Ultimately, it is an investor's decision as to whether they wish to continue to hold their account with us as a non-advised investor, appoint a new authorised adviser or close their account. However, we recommend a non-advised investor seek financial advice regarding their investments, including their investment in CFS Edge and whether this product continues to be appropriate.

2. Available Services

Generally, the services provided to our non-advised investors remain the same as if the investor was advised, except as outlined in 'Services no longer available or limited as a non-advised investor' in Section 4 below. Where an advised investor would have instructed their adviser to complete certain transactions, a non-advised investor will be able to request these transactions. For more information, refer to 'Access to services and communications' in Section 3 below.

Our CFS Edge Service and Support team can provide non-advised investors with information only. For one-off personal advice about the non-advised investor's individual objectives, financial situation, needs or tax circumstance, CFS can provide access to an appointed adviser. For comprehensive and expert advice through an ongoing engagement with a financial adviser, non-advised investors can locate an adviser on the CFS Find an Adviser tool on our website (cfs.findadviser.com.au).

CFS Edge Service and Support contact details are below and also located in the PDS or IDPS Guide:

CFS Edge Service and Support

Phone: 1300 769 619

Mail: Locked Bag 20130, Melbourne VIC 3001

Examples of the transactional (execution only) services available to non-advised investors:

- Making withdrawals or contributions.
- Amending or cancelling insurance cover.
- Placing an investment transaction including buying or selling investments, as well as participating in corporate actions and managed fund withdrawal offers.
- Non-advised investors must declare that they understand and accept the minimum investment timeframe and risk characteristics of the selected investments, as outlined in the CFS Edge PDS and/or IDPS Guide, Investment List, Other Important Information brochure and Target Market Determination (TMD) and take full responsibility for their choice of investments. We may take up to five business days to process a non-advised investor's investment transaction request from the day we receive it. We won't be liable for any changes that may occur in the market from the time the request is made until the time it's actioned.
- Amending or cancelling any regular transactions or facilities on a non-advised investor's account.
- Any regular transactions or facilities setup on a non-advised investor's account will continue and can be cancelled or amended on a non-advised investor's request. These include removing any previously authorised third parties (e.g. accountants) from being able to view the account and stopping any regular contributions, regular investments and regular payments on the account.

- Full transfer from a superannuation account to pension account provided eligibility criteria are met; and
- Closing a non-advised investor's account. For superannuation and pension accounts, this may include a rollover to another superannuation fund or withdrawing the balance (subject to condition of release being met).

3. Access to services and communications

A non-advised investor can access up-to-date information about their transactions, income, expenses and account balance at any time via the CFS Edge investor portal at investor.cfsedge.com.au. A non-advised investor will continue to receive all statements and reports as well as communications in relation to their account. All communication about their account will be sent digitally and will be stored in the CFS Edge investor portal. This includes notifications for corporate actions they are eligible to participate in via the platform notifications and can contact CFS Edge Service and Support if they wish to make an election.

A non-advised investor can also access their CFS Edge account on the go via the CFS Edge mobile app. Through the app they can:

- view their CFS Edge super, pension and investments account.
- obtain a full view of how their money is invested.
- stay up to date with the activities on their account.

If a non-advised investor does not currently have online access to their account, they should contact our CFS Edge Service and Support team to register for access.

Non-advised investors should ensure their contact details are up-to-date. These can be checked and updated through the investor portal or by notifying us of any change to ensure they continue to receive information relating to their account. If we do not have up-to-date contact details information, we may not be able to contact the non-advised investor with important information, periodic statement reporting, or investor requests.

4. Services no longer available or limited as a non-advised investor

- The range of investment options available may change as access to some investments are restricted to investors who have an adviser.
- For investments in the Colonial First State Separately Managed Account (ARSN 618 390 051) (**Signature Menu**) and Infinity Managed Portfolios offer within Ironbark Managed Portfolios 3 (ARSN 636 303 994) (as applicable).
- Non-advised investors can remain in the managed accounts (SMA) offered and will continue to rebalance. Non-advised investors may wish to submit a withdrawal request to sell down their underlying SMA holdings in full. If a non-advised investor instructs to take managed account investments to their service account, any investments not on the CFS Edge Investment list will be sold within the SMAs and underlying investments moved to the service account. This may result in capital gains or losses.
- **The exception is when the public SMA is restricted to certain advisers and/or licensee groups.** Where such a restriction exists, should the investor either become unadvised or they are no longer advised by the adviser/practice/licensee who has exclusive rights to recommend restricted SMAs, their SMA assets are transferred to their service account, and any underlying investments not available directly from the CFS Edge Investment list are sold down. This is the similar treatment to the current Tailored SMA non-advised investor. This may result in capital gains or losses.
- Non-advised investors can choose to switch to or invest additional amounts in an investment option available from the Limited Menu within the CFS Edge Investment list.
- Investments on the CFS Edge Investment list signified as Signature Menu are available to CFS employees without an adviser. The other restrictions noted below do not apply to CFS Employees.
- For Tailored SMAs, when a client changes to unadvised, their SMA assets are moved out to their CFS Edge Super and Pension account or CFS Edge Investments account, and any assets not on the CFS Edge Investment list, are sold down. This may result in capital gains or losses.

- In-specie transfers will be limited. Non-advised investors won't be able to in-specie transfer between accounts such as from pension to superannuation nor between IDPS to IDPS. Non-advised investors won't be able to complete an in-specie transfer out externally.
- No new account applications can be accepted, except in limited circumstances at our discretion.
- Any buy strategy or sell strategy established by the adviser will continue until we receive instructions to end the cash instruction. Non-advised investors will not be able to setup or amend buy strategies or sell strategies. However, if the existing buy investment strategy involves investment options restricted to advised investors, it will fail for those but continue for the unrestricted investment options.
- Any adviser model or MDA established by the adviser will be removed and the underlying investments will be transferred to their service account, except in limited circumstances at our discretion. If the underlying investments are not on the CFS Edge Investment list, they will then be sold down to cash. This may result in capital gains or losses.
- Non-advised investors won't be able to purchase foreign currency. However, they can convert any existing foreign currency holdings into Australian dollars at any time.
- Non-advised investors may receive communications notifying them that a high proportion of their account balance is held in cash or foreign currencies and to consider whether this remains appropriate to their individual needs or to contact a new adviser (see Section 7 below).
- For superannuation and pension accounts, any foreign currency holdings held without international securities may be converted to Australian dollars where the Trustee considers this to be appropriate.
- Non-advised investors will be able to maintain an existing margin loan however won't be able to setup a new margin loan.

5. Fees and charges

Once we receive notification that an investor has become a non-advised investor, we will automatically remove all associated advice fees from their account.

Any administration fees and other fees and costs outlined in the Disclosure Documents will be charged on their account. If there is any administration fee discount arrangement held between the previous adviser and CFS, the discount or rebate will cease and the standard administration fee (stated in the Disclosure Documents) will be applied on the non-advised investor account effective immediately.

However, if a non-advised investor was previously migrated to CFS Edge from another wrap platform product, their existing administration fees arrangement will continue to apply unless otherwise specified.

Should a non-advised investor hold Tailored Managed account which is part of the Accelerate Series, some or all of their underlying investments may be redeemed and placed in cash and the Accelerate Series administration fee discount may be removed.

A copy of the Disclosure Documents are available at cfs.com.au/cfsedge or available upon request by contacting the CFS Edge Service and Support team.

6. Insurance cover

Any insurance cover attached to a non-advised investor's account will remain in place and insurance premiums will continue to be deducted from their account. Non-advised investors will need to monitor their account to ensure they have sufficient cash to meet any upcoming insurance premiums. Failure to do so may result in the cancellation of existing insurance cover.

Non-advised investors can contact CFS Edge Service and Support to alter or cancel their existing insurance cover but are unable to set up new insurance cover.

7. Appointment of a new adviser

We do not automatically appoint a new adviser for an investor once they become a non-advised investor. However, we can provide access to one-off personal advice about the non-advised investor's individual objectives, financial situation, needs or tax circumstance. For comprehensive and expert advice through an ongoing engagement with a financial adviser, non-advised investors can locate an adviser on the CFS Find an Adviser tool on our website (cfs.findadviser.com.au).

If a non-advised investor wishes to nominate a new adviser of their choice, they should notify us in writing of their new adviser. The adviser must be licensed, and both the adviser and their licensee registered to use CFS Edge.

If a non-advised investor has any questions about the appointment of a new adviser, they can contact our CFS Edge Service and Support team.

Compliance statement

This Policy complies with Australian Securities & Investments Commission (ASIC) Regulatory Guide 148 (Regulatory Guide). Platform operators must have a written policy that outlines how they deal with investors who decide not to retain the services of a financial adviser or a financial adviser meeting AIL/CFSIL's requirements.

Definitions

Non-advised investor	When an investor decides not to retain an adviser, ceases to receive financial product advice from an adviser or is expressly permitted by us as a direct client.
SMA	Separately Managed Account is an investment portfolio managed by a professional, where the client owns the individual securities, and the portfolio is customised to their specific needs and preferences.
Tailored SMA	Tailored Separately Managed account is an investment portfolio managed by a professional, where the client owns the individual securities, and the portfolio is customised to their specific needs and preferences. A tailored managed account offer is limited to a specific financial practice or licensee.
MDA	<p>Is an investment account where an authorised portfolio manager has the discretion to make investment decisions on behalf of the client without needing to obtain prior approval for each transaction, based on an agreed investment strategy and the client's goals and risk tolerances.</p> <p>CFS Edge may permit third parties to provide you with MDA services in connection with your account. Your appointed MDA service provider is solely responsible for the MDA service. CFS isn't a party in your agreement with the MDA service provider and will act on instructions provided by the MDA service provider whom you appoint to make investment decisions on your behalf.</p>
Signature Menu	List of portfolios available through CFS's retail managed account offering available through Colonial First State Separately Managed Account ARSN 618 390 051.
Service account	To invest into a managed account, a client must first open a Service account. This is either an Investment Service account or a Super and Pension Service account depending on your selected product.
Limited Menu	The menu of Managed Portfolio options which is made available to non-advised investor.

Avanteos Investments Limited ABN 20 096 259 979, AFSL 245531 (AIL) is the trustee of the Avanteos Superannuation Trust ABN 38 876 896 681 and issuer of CFS Edge Super and Pension. Colonial First State Investments Limited ABN 98 002 348 352, AFSL 232468 (CFSIL) is the Investor Directed Portfolio Service (IDPS) operator, administrator and custodian of the Avanteos Wrap Account Service and issuer of CFS Edge Investments. This document may include general advice but does not take into account your individual objectives, financial situation, needs or tax circumstances. You should read the relevant Product Disclosure Statement (PDS), Investor Directed Portfolio Service (IDPS) Guide and Financial Services Guide (FSG) carefully, assess whether the information is appropriate for you, and consider talking to a financial adviser before making an investment decision. You can get the PDS, IDPS Guide and FSG at www.cfs.com.au/cfsedge or by calling us on 1300 769 619.

One-off Advice: AIL and CFSIL have engaged Viridian Advisory Pty Ltd (Viridian Advisory) (ABN 34 605 438 042 AFSL 476223) to facilitate the provision of personal financial product advice under Viridian Advisory's AFSL, as an agent of each of AIL and CFSIL. Viridian Advisory holds its own financial services licence and provides financial product advice under that licence. Fees will apply and will vary depending on the type of personal advice you require. Viridian Advisory is not part of the CFS group of companies.

AIL and CFSIL advise that: any financial product advice you receive is provided by Viridian Advisory in its capacity as an agent of AIL or CFSIL, and not personally by AIL or CFSIL; Viridian Advisory is not an authorised representative of AIL or CFSIL under the AIL or CFSIL financial services licence; Viridian Advisory is only authorised by AIL and CFSIL to provide one-off or episodic financial product advice and not any other services; and AIL nor CFSIL does not stand behind or guarantee the capital value and/or performance of any investment you may make as a result of the advice you receive from Viridian Advisory. Any other services would be provided in Viridian Advisory's personal capacity and not as AIL or CFSIL's agent. If you receive an advice service through Viridian Advisory, they will provide you with a copy of their FSG. 30877/FS8467/0525