

# Policy 4 – Communications

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## 1 Introduction

KM Property Funds Limited (KMPF) holds an Australian Financial Services License (No. 442806).

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

KMPF 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 KMPF communicates regularly to its stakeholders through a range of methods.

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

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

## 2 Methods of communication

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

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

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

## 3 The website

One of KMPF's main methods of communication for its Retail Funds is via its web site [www.kmpropertyfunds.com](http://www.kmpropertyfunds.com). The following information is made available on the KMPF 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 KMPF's web site must first be approved by an Executive Director.

## 5 Media enquiries

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

## 6 Authorised spokesperson/s

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

- the Chairman
- one of the Executive Directors.

In the first instance comments are to be directed to the Executive 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 (KMPF)

The Manager KMPF 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 (KMPF)

- The Fund Manager, CFO and Compliance Manager ensure 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 KMPF through the agreed Due Diligence Memorandum process.
- Marketing material is prepared in accordance with a program that facilitates stakeholder review and verification.
- Legal Counsel, and Executive Director are to sign off on the PDS and marketing material and the Fund manager engages external advisers if necessary.
- The Fund Manager, CFO and appropriate staff liaise with ASIC where required regarding the PDS and submit 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 and Head of Investment Services ensure 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.

## 9 References

Policy 6 – Continuous disclosure

Policy 25 – Delegated authority