Bentham Global Opportunities Fund

ARSN 623 308 841 APIR HOW6814AU

ASIC Benchmarks and Disclosure Principles Report
8 June 2023

This ASIC Benchmarks and Disclosure Principles Report (**Benchmark Report**) provides specific information in relation to the Bentham Global Opportunities Fund (ARSN 623 308 841) (**Fund**) which is issued by Fidante Partners Limited (ABN 94 002 835 592) (AFSL 234 688) (**Fidante**, **we**, **us**, **Responsible Entity**, **RE**). Bentham Asset Management Pty Ltd (**Bentham** or **the investment manager**) is the investment manager of the Fund.

The information in this document forms part of the Bentham Global Opportunities Fund Product Disclosure Statement dated 8 June 2023.

We recommend that you read this Benchmark Report in conjunction with the Product Disclosure Statement (**PDS**) for the Fund before making an investment decision. A copy of the PDS for the Fund is available from **www.fidante.com**. This Benchmark Report may be updated periodically and non-materially adverse information may be updated at **www.fidante.com**.

A copy of any updated Benchmark Report or PDS will be given to you on request, without charge, by calling the Fidante Investor Services Team on 1300 721 637.

Capitalised terms used in this Benchmark Report which are not expressly defined in this Report have the meanings given to them in the PDS.

ASIC Benchmarks and Disclosure Principles

The ASIC Benchmarks and Disclosure Principles are aimed at assisting investors to understand the risks of investing in funds that meet certain criteria under 'ASIC Regulatory Guide 240: Hedge funds: Improving disclosure' and whether such investments are suitable for them.

The ASIC Benchmarks and Disclosure Principles covered in this Benchmark Report are as follows:

ASIC Benchmarks	**For information on each Benchmark refer to the following pages.**
ASIC Benchmark 1: Valuation of assets	page 2 of this report
ASIC Benchmark 2: Periodic reporting	page 2 of this report
ASIC Disclosure Principles	**For information on each Disclosure principle refer to the following pages.**
ASIC Disclosure Principle 1: Investment strategy	page 2 of this report
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Benchmark 1: Valuation of assets

This benchmark addresses whether valuations of the Fund's non-exchange traded assets are provided by an independent administrator or an independent valuation service provider.

This benchmark is met as the Responsible Entity has in place a policy to ensure valuations of the non-exchange traded assets will be provided by an independent external provider.

For additional information in relation to the valuation of assets, please refer 'How unit prices are calculated' in the Fund's PDS.

Benchmark 2: Periodic reporting

This benchmark sets out information that investors should likely be aware of, on a periodic basis.

This benchmark is met as the Investment Manager has a policy in place to provide detailed monthly and quarterly updates on the Fund's holdings as follows.

The following information will be included in the Fund's periodic report:

- the actual allocation to each asset type;
- the liquidity profile of the portfolio of assets as at the end of the relevant period;
- the maturity profile of any liabilities at the end of the relevant period;
- the leverage ratio (including leverage embedded in the assets of the Fund, other than listed equities and bonds) at the end of the relevant period;
- details on the derivative counterparties engaged;
- the monthly or annual investment returns over at least a five-year period, or since inception if less than five years; and
- any changes to key service providers since any previous report given to investors, including any change in any related party status.

The Fund's latest report will be available on the Fidante website.

On a monthly basis, the following information will be made available on the Fidante website.

- the current total net asset value (**NAV**) of the Fund and the redemption value of a unit as at the date the NAV was calculated. For further information on how the NAV of the Fund is calculated, please refer to 'How unit prices are calculated' in the Fund's PDS;
- any changes in key service providers or their related party status;
- any material change in the Fund's risk profile, strategy and investment team; and
- the net return on the Fund's assets after fees, costs and taxes.

Disclosure Principle 1: Investment strategy

This disclosure principle is intended to ensure that investors are made aware of the details of the investment strategy for the Fund, including the type of strategy, how it works in practice, and how risks are managed.

Investment strategy	The Fund aims to provide investors with investment returns that exceed it's benchmark (Bloomberg AusBond Bank Bill Index) by 3% per annum after fees over rolling three-year periods. The Fund provides diversified exposure to securities across global credit markets with the flexibility for opportunistic investments as market conditions arise. The Fund is actively managed and focused on delivering consistent levels of income, while aiming to protect against downside risk through the flexibility to hold up to 90% cash (if circumstances require). Bentham seeks to invest in global credit markets and add value through actively managing allocations across different credit sectors, adapting the Fund's credit exposure to suit market conditions across the credit cycle. Security selection and allocations across sectors are dependent upon the prospective investment return and risk. Fund risks will be managed on an aggregate basis with respect to various credit, interest rate, currency, and equity delta risks. The Fund has the ability to use short selling (excluding individual equities). Examples of how the Fund may use short selling include: to reduce risk in a particular sector by short selling a credit index; and taking a position in a single name credit default swap. Derivatives may be used to gain exposure when they offer a more cost-effective way of purchasing the underlying security. Derivatives can be used to implement investment decisions (including hedging), managing the duration of the Fund, and as a risk management tool (such as managing the effect of interest rates or foreign currency movements). Investors in the Fund are exposed to risks at both the security level and market level. The key risks and how they are managed are set out in the funds PDS.

Asset Allocation

The Fund will have a minimum credit exposure of -35% and a maximum net credit exposure of 130%.

Asset Class	Min (%)	Max (%)
Cash and Cash equivalents	0	90
Securitised Credit - rating AAA to A	-35	130
Global Syndicated Loans	-35	130
Corporate Bonds - Investment Grade	-35	130
Global Government Backed Bonds	-35	130
Preferred and Capital Securities	-35	40
Corporate Bonds - High Yield (Non IG)	-35	130
Convertible Bonds	-35	30
Emerging Market Bonds	-35	45
Securitised Credit - Rating below A	-35	45
Non-rated Fixed Income	-35	15
Equities	-35	10

Investment Universe

The Fund invests in global credit and fixed interest markets. The Fund's investments include, but are not limited to, Australian and global hybrid securities, global high yield bonds, global syndicated loans, investment grade securities, global capital securities, asset backed securities, equities, repurchase agreements, reverse repurchase agreements and derivatives.

Currency Strategy

Currency positions may be taken by the Fund. Bentham aims to hedge any foreign currency exposure back to the Australian dollar to between 85% and 115% of the NAV of the Fund.

Portfolio Construction and Risk Limits

Portfolio construction guidelines promote diversification and credit quality by limiting the maximum portfolio exposure to any single issuer based on credit ratings. Any single sub investment grade exposure is limited to 3% of net asset value **(NAV)** of the Fund.

For further information on the assets of the Fund refer to 'How we invest your money' in the Fund's PDS.

Leverage

Gearing and leverage is designed to be used opportunistically, not consistently, and can be useful tools to enhance the returns of the Fund. Gearing can be obtained by using an asset as security for borrowing money to increase the amount of money available to invest. Leverage can be obtained by either of the following methods:

- Using derivative instruments to increase the Fund's investment exposure beyond the net asset value of the Fund; direct borrowing; or short selling (excluding individual equities).
- Bentham may use leverage to increase the exposure of the Fund to investment markets and has limited the amount of leverage to 30% of the gross asset value of the Fund. Leveraged market exposure will generally be obtained through the use of derivative instruments including credit default swaps, futures and options.

Derivatives	The Fund may use derivatives to manage risk, gain economic exposure to securities or for leverage. Derivatives may include but are not limited to currency swaps, interest rate swaps, credit default swaps, total return swaps, futures and options. Derivatives may be used to gain exposure when they offer a more cost-effective way of purchasing the underlying security. Derivatives can be used to implement investment decisions (including hedging), managing the duration of the Fund, and as a risk management tool (such as managing the effect of interest rates or foreign currency movements). They may also be used to adjust or implement investment decisions and to gain, or avoid, exposure to a particular market rather than purchasing physical assets. The Fund's constitution permits the use of derivatives. Where the Fund uses derivatives, Bentham aims to manage the Fund so as to keep sufficient liquid assets in the Fund to meet all obligations associated with the derivatives. The main risks to the Fund as a consequence of dealing in derivatives are counterparty risk and derivative risk.
Short Selling	The Fund has the ability to use short selling (excluding individual equities). Examples of how the Fund may use short selling include: to reduce risk in a particular sector by short selling a credit index; and taking a position in a single name credit default swap. Short selling may expose the Fund to risks such as short position risk, liquidity risk and counterparty risk.
Risk Management	Significant risks of the Fund are outlined under 'Risks of managed investment schemes' in the PDS. The primary risks of the Fund include: • Credit Risk: The risk that the issuer of the fixed income security (e.g. asset backed security, corporate bond, corporate loan or derivative counterparty) is unable or unwilling to make interest and/or capital repayments in full and/or on time, or may not meet other financial obligations. Fixed income securities are subject to legal, political, macro-economic, industry and business risks which may lead to a loss of capital or interest payments. • Derivative Risk: The value of a derivative is linked to the value of an underlying asset and can be volatile. While the use of derivatives offers the opportunity for higher gains, it can also magnify losses to the Fund. Risks associated with using derivatives might include the value of the derivative failing to move in line with that of the underlying asset, potential illiquidity of the derivative, the Fund not being able to meet payment obligations as they arise or the risk that the other party with whom the derivative contract is held will fail to perform its contractual obligations. • Gearing Risk: The use of borrowed money or gearing within the Fund will increase investment exposure and can magnify the potential gains and losses from investments and increase the volatility of the Fund's total return. Gearing also increases the risk of the Fund not meeting the financial obligations of the borrowing, including but not limited to the cost of the borrowing and refinancing risk. • Fixed Income Risk: A fund investing in fixed income securities may experience a decline in income where market interest rates are falling and securities are reinvested at a lower yield. The impact of interest rate risk will largely depend on the term to maturity of the security. Refer to 'Interest rate risk' for further information. There are a number of additional risks which can result in significant variability in investment returns and a loss of income or capital value, including market risk and credit risk. The level of credit risk will generally depend on the creditworthiness of the security issuer. Refer to 'Credit risk' for further information. Investors are also exposed to risks associated with the terms and conditions of the individual financial security.

Risk Management continued	• Short Position Risk: A security (credit or equity) short position involves 'borrowing' a security (directly, or indirectly through a credit default swap) and then selling that security. As establishing a short position initially involves 'borrowing' a security, a different assessment of risk is required compared to the risk assessment of investing in the security directly. When investing in a security directly, the maximum loss is generally limited to the amount invested. With a short position, there is no limit to how much an investor can lose if the price of the security continues to rise. This is because a rising security price means the borrower (i.e. the Fund) must pay a higher amount to buy back the security when it comes time to return the security to the lender. Short selling will also increase the Fund's total gross effective exposure to the relevant credit and fixed interest market above 100% of its net assets. This in turn may magnify the exposure to other investment risks detailed in this section. Short positions are also affected by risks associated with the lender of the security. There is the risk that the securities lender may recall a security that has been borrowed at any time. This means the borrower (i.e. the Fund) will have to find another securities lender willing to lend the security or buy the security on the market within a short period of time. This may force the borrower to buy the security at an unfavourable price. A short position can also be achieved with credit derivatives. A 'short' position can be created by buying protection on a single issuer's securities or on an index of securities. If the issuer or index increases in risk the fund will benefit. If the issuer or index decreases in risk the fund will make a loss. • Currency Risk: Some investments held by the Fund may be denominated in a currency different to Australian Dollars. The value of these investments may fluctuate in Australian dollar terms because of fluctuations in currency exchange rates. As an example, a rise in the Australian dollar relative to other currencies may negatively impact investment value or returns. Conversely, a decline in the Australian dollar relative to other currencies may positively impact investment returns. Bentham adopts currency hedging strategies in an aim to reduce the impact of currency movements on the value of the investment. However, it should be noted that such hedging strategies could also reduce the potential for increased gains where the value of that currency increases relative to the Australian dollar. Risk management is embedded in the investment process and is considered at the portfolio level as well as at the security level. Risk is managed by: • diversification across the number of holdings; • single position size and credit sector limits; • continuous portfolio monitoring to minimise unintended risks; and • and portfolio level risk controls including interest rate and credit duration management.
Changes to investment policy	The Constitution permits a wide range of investments and gives us, as Responsible Entity, broad investment powers. We may change the investment manager and/or vary the investment objectives, strategies, benchmarks, asset allocation ranges and processes of the Fund. We will give unitholders written notice of any material variation which we believe they would not have reasonably expected.

Disclosure Principle 2: Investment manager

This disclosure principle is intended to ensure that investors have the necessary information about the people responsible for managing the Fund's investments, as well as the arrangement between the Responsible Entity and any investment manager.

As Responsible Entity of the Fund, Fidante has appointed Bentham Asset Management as the investment manager of the Fund to invest and manage the Fund's portfolio.

Key information on the investment team of the Fund, including details on their qualifications, commercial experience and time spent executing the Fund's investment strategy is provided in the tables below.

Name	**Richard Quin**
Title	Chief Investment Officer and Principal
Year joined	2010
Responsibilities	Richard is responsible for overseeing the investment process, risk management and management of the portfolios.
Investment experience	35 years
Education and professional qualifications	Richard Quin is the CIO & Principal for Bentham Asset Management. Prior to this, he was a Director and Head of the APAC division of the Credit Investment Group for Credit Suisse Alternative Investments. Richard spent nine years within the Credit Suisse Asset Management (**CSAM**) fixed income team as a Credit Portfolio Manager, where he established and managed Bentham's current high yield, global income and syndicated loan funds. In July 2006 he moved internally with his team to the Credit Investment Group where he continued to manage Bentham's current suite of credit portfolios. Richard held a number of senior roles during his time at CSAM, including membership of the division's Global Credit Investment Committee and Chair of the Global Swaps Derivative Investment Committee. Richard was also responsible for the development of the High Grade Alpha Transfer Fund and the diversified fixed interest funds in Australia. Richard holds a Bachelor of Business from the University of South Australia and a Masters of Applied Finance from Macquarie University.
Portion of time devoted to executing investment strategy	90%
Name	**Nik Persic**
Title	Deputy Chief Investment Officer and Principal
Year joined	2010
Responsibilities	Nik is responsible for overseeing the investment process, risk management and management of the portfolios.
Investment experience	24 years
Education and professional qualifications	Nik is the Deputy CIO & Principal at Bentham Asset Management. Prior to joining Bentham, Nik held senior roles at Credit Suisse Investment Group across both the Australian fixed interest team and the Performing Credit Strategies Group. Prior to joining Credit Suisse, Nik worked for six years at the Commonwealth Bank of Australia, where he held analytical roles in corporate finance, equity capital markets and institutional research. Nik's hybrid securities research was rated number one in both the 2003 and 2004 Greenwich/Peter Lee survey of institutional fund managers. Nik holds a Bachelor of Commerce (Hons)/Bachelor of Economics from the Australian National University.
Portion of time devoted to executing investment strategy	90%

Termination of the investment manager's appointment

As RE of the Fund, Fidante is entitled to terminate the investment manager's appointment in writing, with a minimum of five business days' notice. The circumstances in which an investment manager may be terminated include where the investment manager is in liquidation, ceases to carry on or sells its investment management business, breaches the investment management agreement, or if the investment manager ceases to be licensed under the relevant law. Termination of an investment manager may not impact the accrual of management fees and expenses during the period of termination.

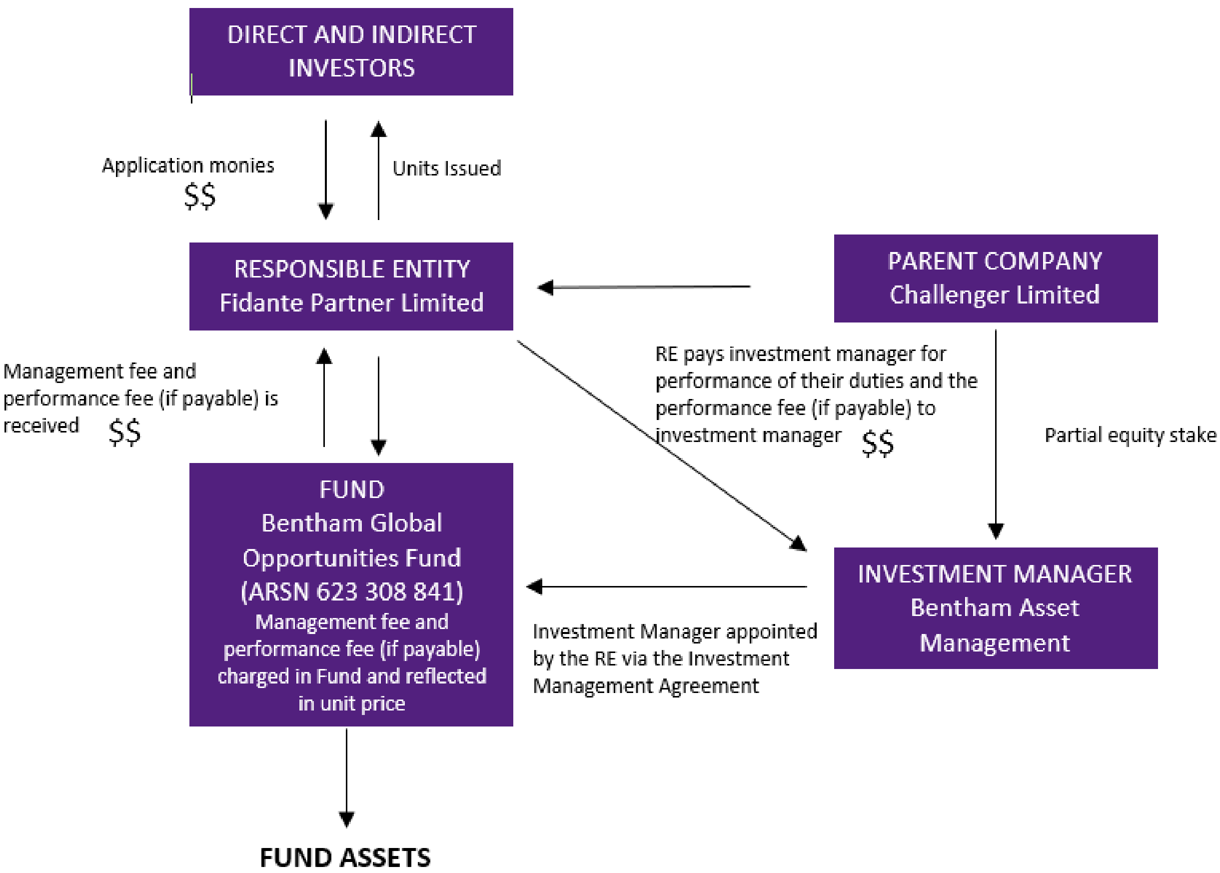
Disclosure Principle 3: Fund structure

This disclosure principle is intended to ensure that the investment structures, the relationships between entities in the structure, fees and other costs payable to the Responsible Entity and investment manager, jurisdictions involved, the due diligence performed on underlying funds, and the related party relationships within the structure are explained.

The Fund's investment structure

The Fund is a registered managed investment scheme.

The diagram below shows the key entities involved in the Fund, their relationship to each other, their roles and the flow of investment money through the Fund as at the date of this report.



The key service providers of the Fund are outlined below.

Key service providers	Role	Scope of services	Jurisdiction
Bentham Asset Management Pty Ltd (ABN 92 140 833 674, AFSL 356 199)	Investment manager of the Fund	Bentham is the investment manager of the Fund and responsible for all aspects of the investment management of the Fund. Bentham is entitled to receive a management fee and performance fee (if applicable) for its management of the portfolio. For further information on Bentham, please refer to 'About Bentham' in the Fund's PDS	Australia
Fidante Partners Limited (ABN 94 002 835 592, AFSL 234668)	Responsible Entity	A wholly owned subsidiary of Challenger Limited and responsible entity of the Fund, Fidante will issue units in the Fund and is legally responsible to the unitholders of the Fund for its operation. For further information on Fidante, please refer to 'About the Responsible Entity' in the Fund's PDS.	Australia
Challenger Limited (ABN 85 106 842 371)	Parent Company of the Responsible Entity	Subsidiaries of Challenger Limited have a partial equity stake in Bentham and provide marketing, and compliance support services.	Australia
Artega Investment Administration Pty Limited (ABN 31 661 042 093)	Fund Administrator	As Fund administrator, Artega Investment Administration Pty Limited (**Artega**) provides the following services: Middle Office; pre and post trade compliance; fund valuation and reconciliations; performance and attribution; fund accounting; distribution calculations and financial accounts.	Australia
Boardroom Pty Limited (ABN 14 003 209 836)	Fund Registry	Boardroom Pty Limited (**Boardroom**) is responsible for maintaining the register of unitholders which includes all details of an investor's account and investments. The registry provider is responsible for sending all correspondence related to unitholders investments as well as providing customer service support.	Australia

Key service providers	Role	Scope of services	Jurisdiction
Citibank N.A, Hong Kong Branch & Citigroup Pty Ltd	Custodian	Citibank N.A., Hong Kong Branch & Citigroup Pty Ltd (**Citi**) have been appointed by the Responsible Entity as the custodian for the Fund. The custodian provides custodial services to the Fund and is responsible for the safekeeping of the assets of the Fund. As custodian of the assets of the Fund, Citi has no independent discretion with respect to the holding of assets and is subject to performance standards.	Australia & Hong Kong
Ernst & Young (ABN 75 288 172 749)	Auditor	Ernst & Young is the registered company and compliance plan auditor for the Fund. The auditor's role is to provide an audit of the financial statements and compliance plan of the Fund each year, as well as performing a half-yearly review (if required), and to provide an opinion on the financial statements.	Australia

The Responsible Entity has entered into separate agreements with each service provider which sets out the terms and conditions of the relationship, as well as the consequences of any breaches to the terms of that relationship. The Responsible Entity has agreements in place with each service provider for the provision of certain reporting obligations and adopts the following procedures to ensure compliance with these arrangements:

- The Responsible Entity monitors the services provided by Citi as custodian, Artega as administrator and Boardroom as registry provider through its day-to-day dealings with the service providers.
- Ernst & Young provides audit services for the Fund's full-year statutory accounts and compliance plan as well as half-year opinions for half-year accounts (if applicable). Ernst & Young's services are conducted in accordance with the Corporations Act 2001 (Cth), including auditing standards as revised by the Auditing and Assurances Standards Board.

Related party relationships

As mentioned previously, a subsidiary of Challenger Limited has a partial equity stake in Bentham. Artega is a member of the Challenger Limited group of companies. Fidante has appointed Bentham as the investment manager of the Fund and Artega as the Fund administrator. We may enter into transactions with, and use the service of, any of our related entities. Such arrangements will be based on arm's length commercial terms. We, or any of our related entities, or any director, officer or employee of any of them may invest in the Fund. There are currently no material arrangements in place with the Fund that have not been made on arm's length terms.

Key risks of the Fund structure

The key risks to the Fund's structure are counterparty risk, currency risk, fund risk and service provider risk. For further information on these risks please refer to 'Disclosure principle 1: Investment strategy' in this report and 'Risks of managed investment schemes' in the Fund's PDS.

Disclosure Principle 4: Valuation, location, and custody of assets

This disclosure principle is intended to ensure that the RE of the Fund discloses the types of assets held, where they are located, how they are valued and the details of any custodial arrangements.

Valuation policy of the Fund

The Fund's assets and liabilities are usually valued each NSW business day. Generally, for unit pricing purposes, listed securities are valued using the last available market close price quoted on the relevant exchange and liabilities are valued at cost. Liabilities also include an accrual for management costs and for costs (if any) that an investor would ordinarily incur when investing in the Fund's underlying assets. Any other assets such as cash and cash receivables are valued at recoverable value.

Any income entitlements, cash at bank, and any amounts of Goods and Services Tax (GST) recoverable from the Fund from the Australian Taxation Office (ATO) are also included in asset values used to calculate the investment and withdrawal unit price.

For more information, refer to 'How unit prices are calculated' in the Fund's PDS.

Asset allocation of the Fund

The strategic asset allocation ranges of the Fund are provided in Disclosure Principle 1.

Custodial arrangements of the Fund

Citi has been appointed by the Responsible Entity as the custodian for the Fund. The custodian provides custodial services to the Fund and is responsible for the safekeeping of the assets of the Fund. As custodian of the assets of the Fund, Citi has no independent discretion with respect to the holding of assets and is subject to performance standards. The assets of the Fund are held in custody by the custodian, located both locally and globally.

Disclosure Principle 5: Liquidity

This disclosure principle is intended to ensure that investors are made aware of the Fund's ability to realise its assets in a timely manner and the risks of illiquid classes of assets.

This disclosure principle does not apply to the Fund as the Fund reasonably expects to realise at least 80% of its assets at the value ascribed to those assets in calculating the Fund's net asset value within 10 days, as at the date of this Report.

Disclosure Principle 6: Leverage

This disclosure principle is intended to ensure that investors are made aware of the maximum anticipated and allowed level of leverage of the Fund (including leverage embedded in the assets of the Fund).

Bentham may use gearing and leverage to increase the exposure of the Fund to investment markets. Leverage will generally be obtained through the use of derivative instruments, although borrowings can also be used. The Fund will have a minimum net credit exposure of -35% and a maximum net credit exposure of 130%. The target credit exposure is expected to be on average less than 100%. It is expected that any leverage will be used opportunistically and not consistently. Bentham has limited the amount of leverage to 30% of the gross asset value of the Fund.

Derivative gearing may increase the volatility of the Fund's unit price by potentially magnifying gains and losses from the Fund's investments. The value and liabilities associated with leveraged investment strategies can be more variable than traditional investments and there may be greater exposure to possible losses. Accordingly, a geared fund may be regarded as having a higher risk profile than a comparable fund which has no derivative gearing.

The below example shows the impact of leverage on investment return and losses, assuming maximum anticipated level of leverage (including leverage embedded in assets of the Fund, other than leverage embedded in holdings of listed equities and bonds):

If the leverage of the Fund was at the maximum of 130% of the Fund's NAV, and the value of the Fund's assets increased by 10%, the increase in the Fund's value would be 13%. That is, for every $1 invested in the Fund, the Fund would earn $0.13. Conversely, a fall of 10% in the value of the Fund's assets would result in a fall in the Fund's value of 13%. That is, for every $1 invested in the Fund, the Fund would lose $0.13. Please note the above assumptions are for illustrative purposes only and are based on each leveraged position in the portfolio being positively correlated with one another. However, in constructing a diversified portfolio, it is likely that some of the leveraged positions will move in an opposite direction to others and the size of the movement will likely be of a different magnitude.

For more information on how the Fund's uses leverage, refer to 'Disclosure principle 1: Investment strategy' in this report and 'Borrowings of the Fund' and 'Gearing and leverage' in the Fund's PDS.

Disclosure Principle 7: Derivatives

This disclosure principle is intended to ensure that investors are made aware of the purpose and types of derivatives used by the Responsible Entity or investment manager, and the associated risks. The term derivative is used to describe any financial product that has a value that is derived from another security, liability or index.

The Fund may use derivatives to manage risk, gain economic exposure to securities or for leverage. Derivatives may be exchange traded or OTC and may include but are not limited to currency swaps, interest rate swaps, credit default swaps, total return swaps, futures and options. Derivatives may be used to gain exposure when they offer a more cost-effective way of purchasing the underlying security. Derivatives can be used to implement investment decisions (including hedging), managing the duration of the Fund, and as a risk management tool (such as managing the effect of interest rates or foreign currency movements). They may also be used to adjust or implement investment decisions and to gain, or avoid, exposure to a particular market rather than purchasing physical assets.

The use of derivatives may result in the investment exposure of the Fund to exceed 100% of the Fund's NAV. Refer to 'Disclosure Principle 6: Leverage' in this report for more information.

Where the Fund uses OTC derivatives, Bentham will only interact with large, institutional derivative counterparties whose capacity to meet financial commitments on obligations is considered satisfactory. Derivative counterparties are monitored on an ongoing basis.

The Fund's constitution permits the use of derivatives. Where the Fund uses derivatives, Bentham aims to manage the Fund so as to keep sufficient liquid assets in the Fund to meet all obligations associated with the derivatives. The main risks to the Fund as a consequence of dealing in derivatives are counterparty risk and derivative risk (including the risks relating to the collateral requirements of derivative instruments).

For more information, refer to 'Disclosure Principle 1: Investment strategy' in this report.

Disclosure Principle 8: Short selling

This disclosure principle is intended to ensure that investors are made aware of how short selling may be used as part of the investment strategy, and of the associated risks and costs of short selling.

The Fund has the ability to use short selling (excluding individual equities). Examples of how the Fund may use short selling include to reduce risk in a particular sector via the purchase of credit default swaps. If the sector increases in risk the fund will benefit. If the sector decreases in risk the fund will make a loss. The fund may also take positions in single name credit default swaps.

Example: Bentham short sells $1,000,000 of a 5-year XYZ corporate bond (via a credit default swap agreement) and pays a spread of 80bps p.a. or $8,000 per year.

In the event of a corporate default (Credit Event), the short seller will receive compensation for the credit loss. In this example, assumed to be 60% of the Face Value of the Agreement.

Potential gains from short selling **At the end of the 5 year credit default swap agreement, the corporate bond defaults.**	
Payment on credit event	$600,000
Coupon cost of the credit default swap (5 years of $8,000 p.a.)	-$40,000
Net profit	**$560,000**

Maximum potential losses from short selling Over the 5-year term of the credit default swap agreement, the corporate bond has not defaulted.	
Payment on credit event	$0
Coupon cost of the credit default swap (5 years of $8,000 p.a.)	-$40,000
Net loss	**$40,000**

Short selling may also increase the Fund's gross exposure to the market above 100% of its net assets. This in turn may magnify the exposure to other investment risks as detailed in 'Disclosure Principle 1: Investment strategy' of this report and 'Risks of managed investment schemes' in the Fund's PDS. The Fund's use of short selling cannot result in exceeding the minimum net credit exposure limit of -35% of its NAV.

Short positions are also affected by risks associated with the lender of the security or counterparty. There is the risk that the securities lender or counterparty may recall a security that has been borrowed, or close a short position at any time. This means the borrower (i.e. the Fund) will have to find another securities lender or counterparty willing to enter the short position within a short period of time. This may force the borrower to close the short position at an unfavourable price.

For more information on how risks are managed, refer to 'Disclosure Principle 1: Investment strategy' in this report.

Disclosure Principle 9: Withdrawals

This disclosure principle ensures that investors are made aware of the circumstances in which the Fund allows withdrawals and how these might change.

If a situation occurs where the assets that the Fund invests in are no longer able to be readily bought and sold, or market events reduce the liquidity of a security or an asset class, there is a risk that the generally applicable timeframe for processing withdrawal requests may not be able to be met. This is because it may take longer to sell these types of investments at an acceptable price. In this case withdrawals from the Fund may take significantly longer than the generally applicable timeframe.

The maximum timeframe in which we, as Responsible Entity, have to meet a withdrawal request is set out in the constitution of the Fund. Where the Fund is not liquid (as defined in the Corporations Act 2001 (Cth)), you may only withdraw when we make an offer to withdraw to all investors under a statutory withdrawal offer, as required by the Corporations Act 2001 (Cth).

Refer to 'Additional information about withdrawing' and 'Withdrawal risk' in the Fund's PDS for more information.

Direct Investors

Direct Investors can request a withdrawal by lodging a Fidante Withdrawal Request Form or in writing. A withdrawal request, either in whole or in part, once received by us may not be withdrawn without our agreement. Withdrawals can only be made to an Australian bank account held in your name.

Indirect Investors

Indirect Investors must complete the withdrawal documentation required by the platform operator.

All Investors

Withdrawals from the Fund are not currently funded by an external liquidity facility.

In the event there are any material changes to withdrawal rights, investors will be notified of these changes in writing as soon as practicable.

Contact details

Phone	Fidante Investor Services Team on 1300 721 637 or +612 8023 5428 from outside Australia between 8.15am to 5.30pm (Sydney time)
Email	info@fidante.com.au
Mail	Fidante GPO Box 3993 Sydney NSW 2001. For any complaints please address to the 'Complaints & Disputes Resolution Officer.'
Website	www.fidante.com.

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