

## Identification Statement

For the purposes of this Statement:

- **ASIC Instrument** means the *ASIC Corporations (Charitable Investment Fundraising) Instrument 2016/813*

Information to be Provided	Information Provided by the Armidale Diocesan Investment Group
Identification Information	<p>The Trustees of the Roman Catholic Church for the Diocese of Armidale ABN 66 010 842 414 on behalf of the CDF, the Armidale Diocesan Investment Group ABN: 20 375 580 300 (hereafter "Armidale Diocesan Investment Group").</p> <p>Corporate Status: Body corporate created pursuant to the Roman Catholic Church Trust Property Act 1936 (NSW).</p> <p>Address: 1/131 Barney Street, Armidale NSW</p>
Compliance	<p>Armidale Diocesan Investment Group relies on the exemption contained in section 5(1)(b) of the Instrument. This exemption is relied on by Armidale Diocesan Investment Group until such time that the Instrument is repealed and no longer appears on the Federal Register of Legislation.</p> <p>Armidale Diocesan Investment Group will meet the conditions of the exemption contained in section 5(1)(b) of the Instrument, in the following ways:</p> <ul style="list-style-type: none"><li>• Armidale Diocesan Investment Group lodges this Information Statement with CDPF Limited for the purposes of subsection 3(a) of the Instrument.</li></ul> <p>Armidale Diocesan Investment Group has developed an identification statement for lodgement with CDPF to meet this requirement. If Armidale Diocesan Investment Group becomes aware of a matter that gives it reason to believe that it has failed or is likely to fail with the conditions of the exemption contained in section 5(1)(b) of the Instrument, it will not rely on that exemption unless:</p> <ul style="list-style-type: none"><li>• it has given full particulars of the matter to ASIC in writing within 15 business days of becoming aware of it; or</li><li>• it has received written notification from ASIC that the exemption continues to apply despite it not having given ASIC full particulars of the matter in writing within 15 business days of becoming aware of it; or</li><li>• it has been notified in writing by ASIC that breaches of that kind need not be notified, and ASIC has not revoked that notification in writing.</li></ul> <p>Armidale Diocesan Investment Group will conduct regular reviews of its practices to identify failures of the conditions of the exemption and has implemented policies and procedures to ensure compliance with the requirements to notify ASIC of such failures. This will ensure that Armidale Diocesan Investment Group meets the Breach reporting requirement in section 5(3)(b) of the Instrument.</p>

<b>Information to be Provided</b>	<b>Information Provided by the Armidale Diocesan Investment Group</b>
Financial year	The financial year for Armidale Diocesan Investment Group runs from 1 February to 31 January of the next calendar year.
Australian Financial Services Licence	Armidale Diocesan Investment Group has entered into an intermediary authorisation agreement with CDF AFSL NSW Ltd ABN 80 617 161 805, AFSL 497040 which holds an authorisation to issue to and deal in debentures in respect of retail clients. The intermediary authorisation agreement enables Armidale Diocesan Investment Group to rely upon the licensing exemption contained in section 911A(2)(b) of the Corporations Act 2001 (Cth) when dealing with retail, non-associated clients.
Charitable purpose	The charitable purpose of Armidale Diocesan Investment Group is the advancement of religion by supporting the charitable, religious and educational works of the Catholic Church. This is achieved by issuing debentures to raise funds which enable the generation of investment returns to fund the charitable, religious and educational works of the Catholic Church and the making of loans to Catholic Schools, Parishes, Diocesan agencies and other Catholic entities to enable them to carry out the charitable, religious and educational works of the Catholic Church.
Method of fundraising	The Armidale Diocesan Investment Group will only issue debentures as its method of fundraising.
Key terms	<p>Armidale Diocesan Investment Group does not currently, and does not have any current plans to, offer any managed investment scheme products.</p> <p>Armidale Diocesan Investment Group only issues to retail, non-associated clients the following debenture products:</p> <ul style="list-style-type: none"><li>• A 'perpetual' debenture account.</li><li>• A 'term saver' style product.</li></ul> <p>There will be no fees and charges for either of these products.</p> <p><b>'Perpetual' debenture account</b></p> <p>This account will pay variable interest rates which will accrue daily. The interest rates are determined by reference to the investment goals of Armidale Diocesan Investment Group, the interest rates offered by Australian deposit taking institutions, the amount of funds held for investment, the interest rates offered on funds invested by Armidale Diocesan Investment Group and other relevant factors.</p> <p>Money can only be withdrawn upon 31 or more days' notice, and then only to an account at an authorised deposit-taking institution which is in the name of the account holder.</p> <p>If a person opens the product as a perpetual debenture, it can be converted to a term saver by notice to Armidale Diocesan Investment Group of the selected term period. The perpetual</p>

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debenture account will be used as the basis of differently branded accounts for marketing purposes, such as Christmas Saver, School Saver and/or Education Saver accounts.

**‘Term saver’ style product**

This product is offered with a term of 3, 6, 12, 18 or 24 months. Interest is paid twice yearly (and on maturity). The interest rates are determined by reference to the investment goals of Armidale Diocesan Investment Group, the interest rates offered by Australian deposit taking institutions, the amount of funds held for investment, the interest rates offered on funds invested by Armidale Diocesan Investment Group and other relevant factors. It is expected the interest rate for the ‘term saver’ style product will be higher than that for the perpetual debenture account types.

The holder of the product can only withdraw their money mid-term in cases of hardship, and money can only be transferred to an authorised deposit-taking institution which is in the name of the account holder.

If a person opens the product as a term saver, then if the holder doesn’t select a new term saver period by the end of the term, it will automatically rollover into a further term of equivalent length to the last-selected term. A customer may also, at the end of a term, elect to convert to a perpetual debenture with withdrawals on 31 days’ notice.

**‘Transaction account’ style product**

This product is only offered to wholesale clients, and retail, associated clients. As per the Instrument, it will not be offered to retail, non-associated clients because it will amount to a short-term investment product, as withdrawals may be made immediately by notice.

Interest rates for transaction accounts are determined by reference to RBA official rates in conjunction with comparison to similar at call accounts offered by Australian deposit taking institutions along with the amount of funds held for investment. These rates are significantly lower than those offered for longer term investments. There are no fees and charges for transaction accounts.

**Parish Growth Deposit**

This product is only offered to parishes (who are wholesale, associated clients). It offers a variable interest rate tied to the performance of the underlying investments made using that money. That is to say, the account holder will receive a proportion of the return generated by the diocese.

There are no fees and charges.

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Armidale Diocesan Investment Group will maintain or arrange for an associate to maintain, a website on which it makes readily publicly accessible the identification statement, as accepted for the purposes of this instrument by CDPF Limited, for 5 years after the last time when Armidale Diocesan Investment Group relied or purported to rely on the acceptance for the purposes of this instrument of that identification statement.

Armidale Diocesan Investment Group will arrange for the website [www.adig.com.au](http://www.adig.com.au) to make the Identification Statement readily publicly accessible for 5 years after the last time Armidale Diocesan Investment Group relied or purported to rely on the acceptance of this Identification Statement by CDPF Limited. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(3) of the Instrument.

Armidale Diocesan Investment Group will take all reasonable steps to ensure that the information in the identification statement is up to date, complete and not misleading at all times.

Armidale Diocesan Investment Group will have policies and procedures in place to ensure that the information in this Identification Statement is regularly reviewed to ensure it is up to date, complete and not misleading at all times. If changes occur that mean this Identification Statement will no longer be up-to-date, Armidale Diocesan Investment Group will lodge an amended Identification Statement. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(4) of the Instrument.

Armidale Diocesan Investment Group will ensure that:

- it does not issue any short-term investment products to any person as a retail, non-associated client;
- no person holds a short-term investment product issued by Armidale Diocesan Investment Group unless it is issued to the holder as a retail, non-associated client.

Armidale Diocesan Investment Group will not issue any short-term investment products to retail non-associated clients. All of the products held by its clients have been transferred to products that don't constitute short-term investment products or their money refunded. This ensures that Armidale Diocesan Investment Group meets the condition contained in subsection 7(5) of the Instrument.

**Information to be Provided**

**Information Provided by the Armidale Diocesan Investment Group**

Armidale Diocesan Investment Group will ensure that all debentures that it has issued are held on terms that they may only be repaid or redeemed:

- if Armidale Diocesan Investment Group has reasonable grounds to believe that if:
  - all repayments and redemptions that it may be required to pay on that day were made; and
  - all repayments and redemptions that may reasonably be expected to be due on each future day were made on that future day;

all holders of debentures would be repaid or redeemed on that day and on each future day in accordance with holders' entitlements; or

- in the case of a holder of a debenture that is an individual—if Armidale Diocesan Investment Group is satisfied that the repayment or redemption would alleviate financial hardship that the holder is suffering or would suffer; or
  - on a winding up of Armidale Diocesan Investment Group.

Armidale Diocesan Investment Group has received advice and has implemented appropriate policies, practices and procedures to ensure that this condition is met, including but limited to the preparation of forward cash projections each week on a rolling 14 day basis. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(6) of the Instrument.

Armidale Diocesan Investment Group will ensure that it only repays or redeems a debenture in accordance with paragraphs (6)(a) to (c) of the Instrument.

Armidale Diocesan Investment Group has internal policies and procedures to ensure that it will only pay or redeem a debenture in accordance with paragraphs 6(a) to (c) of the Instrument except in the circumstances of hardship and Armidale Diocesan Investment Group has a hardship policy in place to govern the repayment or redemption of the debenture in those circumstances. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(7) of the Instrument.

Armidale Diocesan Investment Group will ensure that an entitlement of a person as a retail, non-associated client to be paid or repaid an amount in relation to a debenture is only be discharged by:

- a transfer to an account of the person with an Australian ADI; or
- a cheque payable only to the person.

**Information to be Provided**

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Armidale Diocesan Investment Group will only pay or repay clients by a transfer to an account of the person with an Australian authorised deposit-taking institution. It will not issue cheques or allow payment or repayment by any other means. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(8) of the Instrument.

Armidale Diocesan Investment Group will not refer to any debenture issued in reliance on an exemption in section 5 as being 'at-call' or on 'deposit' or any other word or expression that is of like import to those terms.

Armidale Diocesan Investment Group has internal policies and procedures which require promotional materials and other offer documents to undergo review by certain individuals within the organisation to ensure that it doesn't refer to debentures as 'at-call' or on 'deposit'. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(9) of the Instrument.

Armidale Diocesan Investment Group will ensure that it does not cause, authorise or permit the issue of any promotional material or offer document that states or implies that any of the following has been approved or examined by ASIC:

- the fundraising activities of Armidale Diocesan Investment Group;
- the debentures;
- any promotional material or offer document.

Armidale Diocesan Investment Group has internal policies and procedures which require promotional materials and other offer documents to undergo review and approval by certain individuals within the organisation for compliance purposes. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(10) of the Instrument.

Armidale Diocesan Investment Group will not:

- issue a debenture to a person as a retail client; or
- accept an additional investment from the holder of a debenture that was offered or issued in reliance on an exemption in section 5 or corresponding relief;
- unless Armidale Diocesan Investment Group has disclosed the following in writing to the person that is to hold the debenture:
  - how the investment funds will be used to support the charitable purpose of Armidale Diocesan Investment Group;
  - where the identification statement may be viewed;
  - that Armidale Diocesan Investment Group is required by law to notify investors that the debenture and their offering is not subject to the usual protections for investors under the Corporations Act or regulation by ASIC;

**Information to be Provided**

**Information Provided by the Armidale Diocesan Investment Group**

- if Armidale Diocesan Investment Group does not hold an Australian financial services licence, a statement of that fact.

The terms and conditions of the offer documentation for the debentures issued by Armidale Diocesan Investment Group will contain all of this information. Armidale Diocesan Investment Group has internal policies and procedures which require promotional materials and other offer documents to undergo review and approval by certain individuals within the organisation for compliance purposes. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(11) of the Instrument.

Armidale Diocesan Investment Group will ensure that each offer document and all promotional material that it provides, or causes, authorises or permits to be provided, to a person as a retail client in connection with:

- the issue of a debenture; or
- the acceptance of an additional investment from the holder of a debenture that was offered or issued in reliance on an exemption in section 5 or corresponding relief;
- contain a prominent statement that Armidale Diocesan Investment Group is required by law to notify investors that:
- the investment is only intended to attract investors whose primary purpose for making their investment is to support the relevant charitable purpose; and
- investors may be unable to get some or all of their money back when the investor expects or at all; and
- the investment is not comparable to investments with banks, finance companies or fund managers.

The terms and conditions of the offer documentation for the debentures issued by Armidale Diocesan Investment Group and any related promotional material will contain all of this information. Armidale Diocesan Investment Group has internal policies and procedures which require promotional materials and other offer documents to undergo review and approval by certain individuals within the organisation for compliance purposes. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(12) of the Instrument.

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**Information Provided by the Armidale Diocesan Investment Group**

Armidale Diocesan Investment Group will not:

- issue a debenture in reliance on an exemption in section 5 to a person as a retail, non-associated client; or
- accept an additional investment from a person as a retail, non-associated client from the holder of a debenture that was offered or issued in reliance on an exemption in section 5 or corresponding relief; unless the person has signed and provided a statement (separate to any other statement provided, or agreement entered into, by the person) to Armidale Diocesan Investment Group stating that the person understands the disclosures required by subsections (11) and (12).

Armidale Diocesan Investment Group has policies and procedures in place to ensure each retail, non-associated client signs and provides the required statement either in person or electronically via internet access. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(13) of the Instrument.

Armidale Diocesan Investment Group will, within 6 months after the end of the financial year for Armidale Diocesan Investment Group, prepare financial statements for the financial year.

Armidale Diocesan Investment Group has accounting policies and procedures in place to ensure it prepares the required financial statements. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(15) of the Instrument.

Armidale Diocesan Investment Group will ensure that:

- if the relevant entity is a reporting entity, the financial statements comply with the accounting standards; and
- if the relevant entity is not a reporting entity, the financial statements comply with all the recognition requirements and measurement requirements that apply to reporting entities and all other requirements of the accounting standards that apply to non-reporting entities.

Armidale Diocesan Investment Group will ensure its accounting policies and procedures include the relevant accounting standards. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(16) of the Instrument.



**Information to be Provided**

**Information Provided by the Armidale Diocesan Investment Group**

Armidale Diocesan Investment Group will, within 6 months after the end of the financial year:

- have a registered company auditor audit the financial statements and provide an auditor's report; and
- give the audited financial statements and auditor's report to ASIC, unless it is required by law to give the audited financial statements and auditor's report to the ACNC; and
- publish, and maintain for at least 3 years, the audited financial statements and auditor's report at a web address accessible by a direct link from the web address where the relevant identification statement is or was most recently published.

Armidale Diocesan Investment Group has accounting policies and procedures in place to ensure it has the financial statements audited, lodged with ASIC, and published as required. This will ensure that Armidale Diocesan Investment Group meets the condition contained in subsection 7(17) of the Instrument.

Current interest rates for all products can be obtained by contacting Armidale Diocesan Investment Group.

Any rates of return or distribution; and any fees and costs payable by the holder are determined by the board of the Armidale Diocesan Investment Group from time to time.

**Investors**

The products are offered to:

- retail, associated clients;
- retail, non-associated clients; and
- persons who do not constitute retail clients (i.e. wholesale clients), who may be associates or otherwise.

Short-term investment products are only offered to wholesale clients, and retail-associated clients (excluding voluntary staff). Perpetual debenture and term deposit style debentures are offered to those persons, as well as retail clients who are parishioners, school students, non-Catholics, and Catholics from other dioceses, and also to wholesale clients, who may be associated business of the diocese, or other large businesses or significant investors.

Voluntary staff members are not permitted to open short-term investment products and will be treated as non-associated, retail clients (notwithstanding that they might meet the definition of associates).

Products are offered in person or through printed and online promotional materials issued by the Armidale Diocesan Investment Group.

<b>Information to be Provided</b>	<b>Information Provided by the Armidale Diocesan Investment Group</b>
Audited financial reports	Armidale Diocesan Investment Group is not required to lodge audited financial statements with the Australian Charities and Not-for-profits Commission.
Guarantees and obligations	CDPF Limited will provide a guarantee for the benefit of, and owe an obligation to, holders of any debentures issued by the Armidale Diocesan Investment Group.
Asset types	<p>Armidale Diocesan Investment Group holds investments in the following asset types:</p> <ul style="list-style-type: none"> <li>• Commercial Property;</li> <li>• Term Deposits;</li> <li>• Floating Rate Notes; and</li> <li>• Listed and Unlisted Property Trusts</li> <li>• ASX Holdings; and</li> <li>• <ul style="list-style-type: none"> <li>- Vanguard International Shares Index Fund, ARSN 090 939 610, a passive investment in unhedged international equities</li> <li>- Vanguard International Shares Index Fund (Hedged), ARSN 093 254 909, a passive investment in international equities hedged to AUD</li> <li>- Magellan Global Fund, ARSN 126 366 961, an active investment in unhedged international equities</li> <li>- Magellan Global Fund Hedged, ARSN 164 285 661, an active investment in international equities hedged to AUD.</li> </ul> </li> </ul> <p>These investments of \$23.0m (as at 31 January 2022) invested up to 100% in international equities. This represents 5.7% of total fund assets.</p>
Acceptance of Identification Statement by a sponsor	This Identification Statement is to be accepted for the purposes of the ASIC Instrument by CDPF Limited. A copy of the Deed Poll for CDPF Limited may be found at <a href="https://www.catholic.org.au/all-downloads/bishops-commissions-1/administration-and-information-1/1911-2003-sponsor-deed-poll/file">https://www.catholic.org.au/all-downloads/bishops-commissions-1/administration-and-information-1/1911-2003-sponsor-deed-poll/file</a> .

**Completed by Armidale  
Diocesan Investment Group**



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Grant Devine  
Authorised representative of Armidale  
Diocesan Investment Group

Date: 3<sup>rd</sup> May, 2022

**Accepted by CDPF Limited**



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Authorised representative of CDPF Limited  
Jonathan Campton, Secretary  
Date: 17 May 2022