



DJ Carmichael Pty Limited Best Execution Policy Statement

1. Best Execution Obligation

Under Chapter 3 of the ASIC Market Integrity Rules - Competition in Exchange Markets 2011 (the Rules), DJ Carmichael Pty Limited (DJC) is required to have a 'Best Execution Policy' in place. The aim of ASIC's directive under the Rules is for Market Participants to take all reasonable steps to obtain the best outcome for their clients when executing, receiving and transmitting client orders which relate to equity market products. When executing client orders, DJC will take all reasonable steps to obtain the best possible result for our clients. The purpose of this document is to provide our clients with appropriate information about our execution policy.

This policy applies whenever DJC receives an order from a client for execution. DJC will rely on the 12 month transitional arrangement on ASX permitted under the Rules to adhere to its Best Execution obligations until, and if, DJC becomes a participant of the Chi-X market, which would occur prior to or on 31 October 2012.

2. How we Handle, Execute & Transmit Client Orders

2.1 Receiving Client Orders

When DJC receives an order from you for an equity market product, we will take all reasonable steps to achieve the best outcome for you. In doing so DJC will take into consideration the nature of the order and any priorities you place upon us in relation to filling the order in the market(s).

2.2 Execution of Orders

When executing orders or receiving and transmitting orders on your behalf, DJC will have regard to the following criteria (known as 'execution factors'), for example:

- Price
- Costs
- Speed
- Likelihood of execution (liquidity of market) and settlement
- Size
- Managing market impact
- Nature, or
- Any other consideration relevant to the execution of an order

DJC will also take into account whether you are a Retail or Wholesale client (as defined under the Corporations Act 2001). Except for a specific instruction from you, the best possible result for a retail client's order will be determined by reference to the total consideration involved in the execution of the order. This means that DJC will have regard to both the price at which the security is traded as well as any costs related to execution. In the case of a buy order this would mean the price plus transaction costs. In the case of a sell order this would be the price less transaction costs. For wholesale clients the best outcome may result from any or all of the execution factors listed above.

Our commitment to provide you with best execution does not mean that we owe you any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

2.3 Transmitting Client Orders

DJC will place your orders directly to the order book of the relevant market in such a way as to take all reasonable steps to achieve the best outcome for you. DJC will take into account the execution factors mentioned in 2.2 above, as well as any specific instructions you give to DJC.

3. Specific Client Instructions

In the event that you provide DJC with specific instructions relating to an order (for example placing the order on the ASX versus Chi-X), we will act on those instructions, however you should be aware that you may not achieve the best outcome in relation to Best Execution. If you give DJC specific instructions (written or verbally), we will record the instructions as part of the order. Where retail client instructions are inconsistent with the best outcome, only order-by-order instructions can be accepted.

4. Order Book Identification

At present, equity market product trading in the Australian domestic financial market is conducted on the Central Limit Order Book of the ASX, and therefore subject to price-time priority.

5. Ongoing Monitoring & Review

DJC will monitor and review this policy and associated procedures at least annually to ensure ongoing compliance and relevance. We may also review this policy in light of any material changes in the regulatory or operational environment. Should any material changes to this policy be required, we will notify you.