



INVESTMENT CAPABILITY
STATEMENT
- *Strategic models*

IndexInvest

Investment Managers



Important Information

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Accounts managed on an investor’s behalf by IndexInvest are subject to investment risk, including possible delays in repayment and loss of income and capital invested. IndexInvest, the Board of IndexInvest and its director/s and employees, the appointed administrators, consultants or agents do not guarantee any particular rate of return or the performance of the investments, nor do they guarantee the repayment of capital.

This Capability Statement should be read in its entirety before making a decision to use the investment strategies. The issue of this Capability Statement Information is authorised solely by IndexInvest.

This Capability Statement is not a product disclosure statement for the purposes of Part 7.9 of the Corporations Act 2001. Accordingly, the level of disclosure within this Capability Statement is less than that required in a product disclosure statement. Before making an investment or trading decision based on advice, the recipient should carefully consider the appropriateness of the advice in light of his or her financial circumstances and should carefully review the PDS regarding the relevant financial product.

GENERAL ADVICE WARNING

The information contained in this Capability Statement is general information only and does not take into account any individual’s objectives, financial situation or needs. Investors should read this Capability Statement carefully and assess whether the information is appropriate for their circumstances and consider talking to a financial adviser before making an investment decision. Any advice provided previous to a Statement of Advice (SOA) is general advice only.

Information in this document may change from time to time. A paper copy of the updated information will also be available upon request and free of charge by contacting us. We may also be required to amend this document as a result of certain changes, in particular where the changes are materially adverse from the point of view of a reasonable person deciding to invest via the Strategies.

IndexInvest cannot provide the Strategies to you unless a valid form of instruction such as a confirmation in writing via email or print has been completed by you and received by IndexInvest. All amounts in this Capability Statement are given in Australian dollars (unless otherwise specified).

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1. Introduction

IndexInvest Pty Ltd ('IndexInvest') is a specialist investment manager that offers model portfolio services to a diverse range of investor clients via Separately Managed Account (SMA) and Managed Discretionary Account (MDA) structures or via direct arrangement. Further information relating to SMA and MDA management structures is available on request. IndexInvest manages the investor's Portfolio on a discretionary basis in accordance with a mandated strategy.

The key advantages of the Investment Strategies are:

- Investors gain exposure to global investment outcomes selected and managed by an experienced, professional, dedicated team.
- Regular investment reports are provided alongside online viewing access to the investor's account.
- Legal and beneficial ownership and ultimate control of the underlying investments remains with investors giving them greater security, transparency and control than comparable collective investment vehicles.
- Investors investments are absolutely separate from the investments of IndexInvest's other clients. This means that investments or withdrawals by other clients will not cause you to incur any additional costs, unlike some comparable collective investment vehicles (such as unitised Managed Funds).
- Investors investments are absolutely separate from IndexInvest and its related parties. At no time do investor funds co-mingle with IndexInvest or its related parties. In short, investors are not investing *in* IndexInvest.
- A remuneration structure for the managers of the investment which aligns with investor goals.

2. Investment Approach

2.1 Who we are

IndexInvest is a privately held investment management firm based in Brisbane, Australia. IndexInvest is a corporate authorized representative of Zenith Representatives Pty Ltd, holder of Australian Financial Services License No. 479263.

2.2 Investment approach

The IndexInvest *Strategic* model's investment manager applies a philosophy which considers that the asset allocation decision is responsible for 93.6% of a diversified portfolio's investment return pattern over time (Brinson et al, 1986; Donaldson et al, 2013).

The asset allocation decision is responsible for approximately 90% of portfolio movements, while the remaining 10% comes from security selection and market-timing.

Focusing on the relevant risks in any financial market allows the manager to focus on the priorities of:

- Risk mitigation – a central priority is limiting the downside of each trade. We have observed that the decline in markets is far swifter than any recovery. Accordingly, we assist investors reduce the risk to capital decline, which underpins future capital growth objectives,
- Adding attractive rates of return to reward investors for the risks undertaken in any investment action,
- Comprehension of how the markets have formed views and where, via our research, our understanding varies to that implicit in the prevailing pricing of market assets.

2.3 Portfolio management

Investments identified by the rigorous methodology and selected by the portfolio manager are blended together to maximise profit potential without assuming unacceptable levels of risk.

Each model portfolio provides broad market exposure across asset classes including Australian equities, global equities, property, Australian fixed income and international fixed income (excepting the high growth portfolio which may exclude Australian and international fixed income).

The portfolio manager works continually and intensively to identify events and forces which alter the assessment of markets and inherent risks.

Underlying Investment Instruments

IndexInvest uses Exchange Traded Funds (ETFs) and exchange traded commodities (ETCs) which are an ASX sub-set of Listed Managed Investments (LMIs) called Exchange Traded Products (ETPs), for asset sectors where these are available.

Utilising simple low-cost ETF strategies delivers diversified exposure for considerably less cost than the average cost of Australian managed funds.

Some key considerations relating to the ETFs used are:

- To this point in time only ETFs listed on the ASX are included in the universe of researched opportunities.
- Predominantly “long” ETF holdings are used - this means those ETF securities reflecting the general forward-looking trajectory of a market. However, some ETFs may comprise a “short selling” strategy and will be considered for use on a selected basis and where supported by the research process. For example, holding the ETF security BEAR long will result in a short of the ASX200 given the security is structured to behave precisely inverse to the movements of the ASX200.

In the practice of short selling, the investor sells the financial instruments that are not currently owned, and subsequently repurchases them ("covering"). In the event of an interim price decline, the short seller profits, since the cost of (re)purchase is less than the proceeds received upon the initial short sale.

- IndexInvest focuses on ETFs holding the underlying physical asset (replications indices) that is, the actual shares comprising the index. In some sectors this is unachievable (oil, agriculture. etc.) so synthetic structured ETFs may be used.
- Few exotic ETFs are available on the ASX however those which are, may be used to achieve specific outcomes e.g. to profit when markets are declining. Such exotic strategies include shorting, inverse or leveraged ETFs. For the most part, basic index exposures where the underlying indices are deep and liquid are the main instruments used.
- IndexInvest maintain complete position transparency for investors at all times.

Strategic Asset Allocation Investing

This form of investing considers the overall asset allocation set by/for the investor is a critical element in the investor achieving their long-range objectives. It is believed that a diversified approach to portfolio construction is critical to success.

Each IndexInvest Strategic model portfolio is split between growth and defensive assets across a range of ETFs that the manager considers provide an appropriate exposure to the relevant asset class. Typically, a broad allocation for the model portfolios may appear as represented in the table below.

Risk / Return Profile	Growth Assets Allocation	Defensive Assets Allocation
BALANCED:	60%	40%
GROWTH:	80%	20%
HIGH GROWTH:	98%	2%

When stock and commodity markets remain volatile, a strategy of rotating to bonds and/or cash comprises part of the capital preservation technique.

Why these Strategies Appeal

- Live and back-tested returns are attractive: The screening approach has demonstrated attractive risk-adjusted returns. Results demonstrate consistency in terms of volatility and performance given the market conditions experienced.

- Liquid diversified solution – daily liquidity.
- Rules-based and disciplined investment process and risk management.
- Investors can use the diversified model portfolios – Balanced, Growth and High Growth - as **core** and the 'IndexInvest Growth Satellite' model portfolio strategy as a highly targeted **satellite** exposure to push growth prospects further.
- Exchange traded funds provide liquidity, wide diversification and less risk than concentrated equity investment strategies. Combined with our strategy of establishing long-term allocations to the major asset classes, ETFs create the opportunity for attractive risk versus reward opportunities with a large amount of diversification
- Focus on generating superior rates of return for risk taken, and with an emphasis on preserving capital through the ability to invest in fixed income ETFs and cash in difficult market conditions or when the market finds them more attractive than shares, property and commodities.
- ETFs are much lower cost than traditional managed funds.

3. The Investment Team

IndexInvest was established in 2009 with the mandate to innovate investment solutions which provide consistent and reliable investment outcomes. Further information about IndexInvest is available at www.indexinvest.com.au. Key personnel are:

MARK HOLZWORTH, Director.

MCom (Acctg), AdvDipBus (Acctg), DipFP, Fellow- Institute of Public Accountants (FIPA), Fellow – Institute of Financial Accountants (UK) (FFA)

Mark founded IndexInvest and serves as Chief Investment Officer and Strategist. He maintains principal responsibility for managing investor portfolios.

Mark is qualified as both an Accountant and Financial Adviser. His undergraduate studies were in Accounting and Financial Planning. He holds a post-graduate Master of Commerce (professional Accounting) degree which focused on technical topics such as Advanced Tax Law, Strategic Planning, Securities Analysis and Portfolio Management.

Mark is a Director of specialist boutique financial advisory *HWP Financial Pty Ltd (HWP)*. Both IndexInvest and HWP are Corporate Authorised Representatives of Zenith Representatives Pty Ltd, the holder of an Australian Financial Services License (no. 479263), of which Mark is shareholder, Director and Responsible Manager. Mark is also Director of the Accounting, taxation and Business services firm *Holzworth Partners Pty Ltd*.

Mark is a Fellow of the Institute of Public Accountants and a Fellow of the Institute of Financial Accountants (UK). Mark is also a Registered Tax Agent, an Approved SMSF Auditor and an Accredited Derivatives and Foreign Exchange adviser.

RICHARD LEI, Analyst

MCom, MBus, CFA

Richard is a research analyst and has responsibility for the application of research principles in the IndexInvest process. In addition, Richard analyses markets data and filters these through the many criteria developed for determining optimum portfolio selection.

Using quantitative and qualitative methods, Richard draws upon core competencies in the interpretation and application of financial data to solve unstructured problems.

Richard holds a Master of Commerce degree from the University of Queensland and a Master of Business degree from Griffith University. Richard is also a Chartered Financial Analyst (CFA®) Charterholder.

DANIEL JUDGE

BFin, AIPA

Daniel is responsible for portfolio reporting and portfolio execution of the IndexInvest strategies. He also fulfils, research, support and administration roles within the firm.

Daniel holds a Bachelor of Finance (Financial Planning and Management) degree from QUT. He is also an Associate member of the Institute of Public Accountants.

4.0 INDEXINVEST Strategic Portfolios

The IndexInvest Strategic model portfolios provide investors with exposure to a proven long-term investment process targeting diversified returns as represented across multiple asset classes.

4.1 Objective

The primary focus of the IndexInvest diversified portfolios process is:

1. Investor capital preservation;
2. Achievement of consistent and reliable investment returns outperforming the nominated benchmarks over the long-term.

IndexInvest offers three diversified strategic model portfolios – Balanced, Growth, High Growth – which are designed with the view that the investor, with input from their adviser or consultant, selects the model best suiting the investor’s risk profile.

These models aim to diversify across major asset classes (Australian cash, Australian and global fixed interest, Australian shares, international shares and listed property) except for periods of volatility where a model may hold greater than usual cash and/or bond type positions.

4.2 Process

The below table shows the usual Strategic Asset Allocation (SAA) of each diversified model. It is anticipated each model will be assessed against these benchmark allocations at each re-set (re-balance) period.

Investment Objective	Balanced		Growth		High Growth	
	SAA	DAA %	SAA	DAA %	SAA	DAA %
Australian Equities	23%	(0-30)	32%	(0-40)	41%	(0-50)
International Equities	26%	(0-38)	36%	(0-45)	47%	(0-55)
Listed Properties & Infrastructure	11%	(0-15)	12%	(0-17)	12%	(0-28)
Fixed Interest	35%	(20-83)	18%	(10-65)	0%	(0-65)
Cash (or Cash-like)	5%	(3-100)	2%	(2-100)	2%	(0-100)

However, within an asset class the allocation to underlying sectors will be selected and managed on a Dynamic basis as determined by research results. The object will be to remain fully invested within that asset class when market conditions remain favourable and conducive to capital growth.

When market conditions sour or research processes raise concerns about increased risk ahead, the opportunity exists to exit selected or all holdings of that asset class to cash and fixed interest allocations, thus preserving and protecting investor capital.

4.3 Risk Management

- Diversified portfolios will generally hold between 6 and 12 securities;
- In periods of markets volatility, the number of securities held may decrease;
- “Stop losses” to manage draw-downs are identified at purchase so as to protect capital positions by selling ETFs if they fall 7% or more from their purchase price or highest price point achieved during a quarter.

- Portfolios are designed to be re-weighted (sometimes referred to as “re-balanced”) periodically to be somewhat aligned to the asset allocations selected. This re-weighting may occur on a quarterly basis.

4.4 Benchmarking

The benchmark set for each of the IndexInvest Strategic model portfolios is conditioned on a Consumer Price Index plus (CPI+) philosophy.

Acknowledging that investors are real people, IndexInvest is of the view that investors have real investment expectations. The reality of these expectations is that performance needs to reflect the costs of living plus a reward for the risk taken in investing.

Benchmarks established against various markets (equities, property, diversified, etc.) may tend to misrepresent and distort the real purpose of investment activity. This is because investors do not aim to outperform ‘markets’, for to do so may result in unsatisfactory outcomes.

For example, if a portfolio were to set the S&P/ASX200 as its benchmark to outperform, and the benchmark performance was minus 5% for a period and the portfolio achieved minus 3%, then technically the portfolio has achieved its objective by outperforming the benchmark. This isn’t satisfactory to the investor however, as it has still achieved a negative return.

Benchmarks set to ‘CPI+2’ acknowledge investor expectations of achieving a *real return* over rolling 60-month periods.

Accordingly, each of the IndexInvest Strategic model portfolios is benchmarked as follows.

Model Portfolio	Consumer Price Index Plus x%
IndexInvest Strategic High Growth	CPI+ 4%
IndexInvest Strategic Growth	CPI+ 3%
IndexInvest Strategic Balanced	CPI+ 2%

4.5 Fees

Each of the IndexInvest Strategic model portfolios currently has an investment management fee of 0.45%p.a. plus GST. An “expense recovery” payable to the Australian Financial Services Licensee authorizing IndexInvest of 0.20%p.a. may also apply (though we note this has not been levied since 2014 and is not envisaged to be levied in the foreseeable future).

Each portfolio is available via selected investment platforms, structured as a Separately Managed Account (SMA), the IndexInvest Managed Discretionary Account (MDA) and via direct arrangement (for large balances). Speak with your adviser to source the appropriate offer document.

4.6 Summary

Name		IndexInvest Strategic Model portfolios
Investment Manager		IndexInvest
Investment Objective		<ul style="list-style-type: none"> Annual return: CPI + 4%; CPI + 3%; CPI + 2% over a rolling sixty-month period To achieve a capital growth objective which is compatible with the risk profile of the respective allocations to each major asset class.
Beneficial Ownership – SMA		Remains with investor. Legal ownership is designated to the SMA Custodian.
Legal Ownership – MDA or direct investors		Remains with investor. All assets are held in the investor’s own name.
Recommended Investment Timeframe		Five years is the minimum time an investor should expect to allocate to the strategies.
Minimum Initial Investment		\$1,000,000 for direct investors (no minimum for additional investment). \$20,000 for indirect investors via a platform (SMA) or MDA service.
Executing Broker		CMC Markets; Open Markets; Desk-Top Broker; Morgan Stanley; JP Morgan
Mandated	Investment Universe	Exchange Traded Products (ETPs) including Exchange Traded Funds (ETFs), Exchange Traded Commodities and unlisted index funds
	Exposure	No single holding will usually constitute greater than 50% of the value of the portfolio other than cash or cash like short-duration financial securities typically comprising instruments of twelve months duration or less.
	Cash	Cash balances may be up to 100% of the value of the Portfolio when either: <ol style="list-style-type: none"> No securities can be identified which satisfy the manager’s risk / return criteria; Securities are stopped out due to price volatility.
Target	Concentration	May hold up to 12 securities/funds.
	Liquidity of investments	Ongoing monitoring and management of liquidity risk to within a cceptable levels. Constant availability is anticipated.
	Diversification	This strategy aims to diversify at the quarterly re-set (re-balance) to reflect SAA principles. Where volatility exists or is anticipated over the upcoming quarter regarding selected sectors, an under-allocation to a sector may occur resulting in an overweighting to cash or short-selling opportunities.
Fees	Entry/ Exit Fee	Administration fee by agreement, otherwise nil.
	Management Fee	Up to 0.45% (excluding GST) p.a. of the value of the investor’s portfolio. An expense recovery fee of 0.20%p.a. may also apply (though has not typically been collected).
	Performance Fee	Nil.

5.0 Investment Risk and Risk Management

IndexInvest believes that the risks discussed below are the significant investment risks for an investor using the model portfolios. The risks described below are not exhaustive. We cannot eliminate all risks and cannot promise that the manner in which we manage them will always be successful. If these risks eventuate, the value of your investment could fall significantly.

The significant investment risks are:

5.1 Market risk

Market risk refers to changes in the prices of investments in your Portfolio that may result in loss of principal or large fluctuations in the valuation of your investment within short periods of time. Factors that drive changes in asset prices include changing profitability of companies and industries, economic cycles and conditions, volume of security issuances, investor demand levels, business confidence and government and central bank policies.

5.2 Strategy and model risk

IndexInvest uses investment and risk analytical processes and models in providing the model portfolios. However, these processes and models may not successfully select profitable investments, manage risk or perform in a manner to which they have historically performed or were intended to perform. This may have an adverse effect on the performance of your Portfolio. Past performance results are not necessarily indicative of future performance outcomes.

5.3 Counterparty risk

Counterparty risk is the risk of loss due to a counterparty not honoring a financial commitment which may cause the value of your Portfolio to fall. Counterparties in this case are your executing brokers and product issuers. For further details we can provide at your request the Product Disclosure Statement (PDS) representing the underlying ETF investments and unlisted managed index funds.

5.4 Manager risk

Manager risk refers to the risk that the IndexInvest investment strategy will not achieve its performance objectives or not produce returns that compare favourably against its peers. Many factors can negatively impact IndexInvest's ability to generate acceptable returns from its security selection process, including the loss of key staff.

5.5 Volatility risk

Volatility risk refers to the potential for the price of securities in your Portfolio to vary, sometimes markedly and over a short period of time. As an indicator of risk, the greater the volatility of returns the more likely it is that returns will differ from those expected over a given time period.

Investments in equity like securities and currency are traditionally towards the higher end of the risk-return spectrum. This may lead to fluctuations in the value of your Portfolio, including fluctuation over the period between a withdrawal request being made and the time of payment. Listed equity markets have the potential to experience sharp declines and are volatile; indeed volatility in some markets can

be at very high levels as seen in 2008 and 2009. Investing in volatile conditions implies a greater level of risk for investors than an investment in a more stable market. You should carefully consider this additional volatility risk before deciding to use the model portfolios.

5.6 Contract and Fund specific risk

Each investment in ETFs is subject to the risk of that particular contract's or securities' performance due to factors that are pertinent to that instrument, the sector of the market to which the instrument belongs, or markets generally. These factors may cause an instrument to perform adversely and where your Portfolio has exposure to that instrument, it may affect the performance of your Portfolio.

5.7 Concentration risk

The fewer the number of holdings in your Portfolio, the higher the concentration risk. The more concentrated your Portfolio is, the greater the risk that poor performance in a group of instruments may significantly affect the performance of your Portfolio.

Concentration risk can also occur at an asset class level. Accordingly, you should consider your exposure to a concentration risk as a consequence of using the strategy/ies and in light of your other investments.

5.8 Liquidity risk

Particular securities or investments may be difficult to purchase or sell, preventing the portfolio managers from closing out positions or rebalancing within a timely period and at a fair price. Accordingly, liquidity risk is a risk for users of the model portfolios. IndexInvest is aware of this risk and has developed processes to monitor, mitigate and manage it.

5.9 Inflation risk

Your investments may not keep pace with inflation. Broadly, this means prices may increase by more than the value of your investments. If this risk eventuates, you would not be able to buy as much with the value of your investments as you could now.

5.10 Currency risk

Securities in your Portfolio may be exposed to currency risk that arises from the change in price of one currency against another. Securities may face direct currency risk where they are denominated in foreign currencies and those positions are not fully hedged. You should be aware that movement in currencies can affect the net performance outcome of any trade.

IndexInvest has processes to monitor the currency risk exposures of the investments in your Portfolio.

5.11 Change of law and other statutory restrictions

Changes in laws or their interpretations including, but not limited to, taxation and corporate regulatory laws, practice and policy could have a negative impact on the returns of investors.

IndexInvest maintains a focused approach to risk management.

Further information relating to the risks of investing is available in the HWP Financial Education Guide and the Product Disclosure Statements (PDS) issued by each of the ETF / unlisted managed index funds invested in by IndexInvest. You should carefully review the PDS regarding the relevant financial product.

7. How it works

7.1 Ownership

Separately Managed Account (SMA) - All assets (including cash) within Portfolios are held by the Custodian for the benefit of the investor.

No cash or securities in a Portfolio are held by the Manager, IndexInvest. Independent confirmation of your asset holdings can be provided on request from the Custodian.

Managed Discretionary Account (MDA) – All invested assets are held in the investor's name via its Holder Identification Number (HIN) at the ASX's CHESS system. Cash is held in the investor's own cash account. Managed fund type investments are held in the investor's name.

7.2 Investment Authority

When investors apply for a model portfolio, they execute a power of attorney in favour of the account operator that authorises the manager to, amongst other things:

- Make all investment decisions on the investor's behalf relating to the Portfolio/s. This includes directing the buying and selling of securities,
- Debiting the linked cash account for fees

We recommend you refer to the MDA section of the HWP Financial FSG for further information relating to the operation of the MDA.

7.3 Trading

Where possible we aggregate orders for trading purposes and execute them through the executing broker. Aggregating all investor trades enables a lower cost brokerage cost outcome.

When orders are completed, they are then allocated and settled to individual client accounts.

8. Fees and Charges

The agreement between the parties allows for fees and expenses to be charged to investors. The fees and expenses represent charges that are incurred as a consequence of using the portfolio models. Such fees and expenses will be directly debited from the linked cash account.

Please note that all fees quoted within this document are exclusive of the impact of goods and services tax (GST).

8.1 Ongoing management fee

IndexInvest charges a management fee for its services. The fees are described earlier in this document. All fees and the basis on which they are calculated are detailed in the offer documents linked to the service you are recommended.

8.2 Service costs

Service costs charged by executing brokers which are attributable to the provision of the model portfolio (including brokerage) will be charged against the linked cash account. Subject to the above, IndexInvest will pay all of its own costs that it incurs in providing the model portfolios.

9. Depositing and Withdrawing Funds

9.1 Opening an Account

To invest, please request and complete an Application Form, then send it to us or your financial adviser.

The minimum investment requirement may be waived at our discretion. We may also, at our discretion, reject applications for investment in the IndexInvest model portfolios.

9.2 Withdrawals

You may request a withdrawal at any time by contacting us. A minimum account balance should be maintained.

10. Other Information

10.1 Reporting

Online reporting:

A full suite of online reporting features are available via the service website. These are available 24 hours per day, 7 days a week.

Annual Report:

Services offering the IndexInvest models will provide an annual investor statement to all investor accounts detailing the performance of the strategy and all items for completion of taxation requirements.

10.2 Anti-money laundering

IndexInvest and designated external service providers maintain a plan which identifies, mitigates and manages money laundering and terrorism financing risks as required by the Anti-Money Laundering & Counter Terrorism Financing Act 2006 (Cth).

10.3 Complaints

We are committed to the provision of excellent service and take all complaints seriously. We have implemented processes to respond to complaints in a timely manner. Any complaint must be addressed in writing to:

Complaints Officer
IndexInvest Pty Ltd

GPO Box 5073
Brisbane Qld 4001

For more information on our complaints handling process, please contact us using the details above.

If you are dissatisfied with our decision or the way we handled your complaint or dispute, you may contact Zenith Representatives Pty Ltd. If your complaint is still unresolved you have the right to contact the Australian Financial Complaints Authority (ABN 67 131 124 448) ('AFCA'). AFCA is an external dispute resolution scheme that provides free services to consumers. It is an independent and impartial body which will deal with your complaint directly or follow up the matter on your behalf in accordance

with its applicable terms of reference.

You can contact AFCA by:

Phone: 1300 780 808 or 03 9613 7366
Fax: 03 9613 6399
Web: www.afca.org.au
Email: info@afca.org.au
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

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