

Product Disclosure Statement and Reference Guide updates

This document contains updates to information in the Sandhurst Growth Fund Product Disclosure Statement (PDS) and the Sandhurst Diversified Funds Reference Guide (Reference Guide) both dated 30 January 2017, where the updated information is not materially adverse.

The updates below should be read in conjunction with the current PDS and Reference Guide (as relevant) which can be found [here](#).

Sandhurst Trustees Limited (Sandhurst) is the responsible entity of the Sandhurst Growth Fund (Fund).

01 February 2022 – Fees and Costs update

Sandhurst has undertaken a review of the fees and costs in relation to the Fund's financial year ended 30 June 2021 and wishes to update the fees and costs disclosed in the PDS.

The below updates are made to the PDS.

PDS Page 6:

- The Fees and costs table is updated by deleting and replacing the last row with:

The fees and costs for managing your investment ² .	1.50% p.a. ^{3,4} on the net asset value of the Fund
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PDS Page 7:

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing the last two rows with:

PLUS Management Costs	1.50% p.a. ^{1,2}	And, for every \$50,000 you have in the Sandhurst Conservative Fund, you will be charged \$750 each year.
EQUALS Cost of Sandhurst Growth Fund		If you had an investment of \$50,000 at the beginning of the year and you put in an additional \$5,000 during that year, you would be charged fees of: \$750 * What it costs you will depend on the fee you negotiate.

Reference Guide Page 4:

- The 'Management costs' section in the Fees and costs table is updated by deleting and replacing the row beneath the heading 'Management costs' (above Service fees row) with the following:

The fees and costs for managing your investment ²	<ul style="list-style-type: none"> Sandhurst Conservative Fund: 1.47% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Balanced Fund: 1.48% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Growth Fund: 1.50% p.a.^{3,5} of the net asset value of the Fund. 	The management costs (including the management fee) are paid from the assets of the relevant Fund and are reflected in the unit price of the Fund. The management costs are calculated on the Fund's net asset value, accrued daily, and paid quarterly in arrears to Sandhurst following the end of the March, June, September and December quarters.
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Product Disclosure Statement and Reference Guide updates

Reference Guide Page 5:

- Under the 'Additional explanation of fees and costs' heading, the table of 'Performance-related fees' is deleted and replaced with the following:

	Management costs (excluding performance related fees)	Performance-related fees (based on financial year ended 30 June 2021)	Total management costs (including performance related fees based on financial year ended 30 June 2021)
Sandhurst Conservative Fund	1.46%	0.01%	1.47%
Sandhurst Balanced Fund	1.47%	0.01%	1.48%
Sandhurst Growth Fund	1.48%	0.02%	1.50%

21 December 2021 – Fees and Costs update

Sandhurst has undertaken an annual review of the fees and costs in relation to the Fund's financial year ended 30 June 2021 and wishes to update the fees and costs disclosed in the PDS. (For the avoidance of doubt, all references in this section to "PDS" mean the Product Disclosure Statement for the Fund and the Reference Guide dated 30 January 2017 as updated by the earlier sections in this document.)

The below updates are made to the PDS.

PDS Page 6:

- The Fees and costs table is updated by deleting and replacing the last row with:

The fees and costs for managing your investment ² .	1.59% p.a. ^{3, 4} on the net asset value of the Fund
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- Footnote '4' beneath the 'Fees and costs' table is deleted and replaced as follows:

"⁴ The management cost is based on the financial year ended 30 June 2021."

PDS Page 7:

- Under the 'Transactional and operational costs' section, the fourth and fifth sentences are deleted and replaced with the following:

"However, some of these costs are recovered through investor buy/sell spreads (see below). The transactional and operational costs of the Fund for the past financial year ended 30 June 2021 were as follows:

Total transactional and operational costs	Minus investor buy/sell spread recovery	Equals net transactional and operational costs
0.16%p.a.	0.09%p.a.	0.07%p.a.

These costs may vary depending on the level of Fund transactions and may be different in the current and future financial years."

Product Disclosure Statement and Reference Guide updates

PDS Page 7 continued:

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing the last two rows with:

PLUS Management Costs	1.59% p.a. ^{1,2}	And , for every \$50,000 you have in the Sandhurst Conservative Fund, you will be charged \$795 each year.
EQUALS Cost of Sandhurst Growth Fund		If you had an investment of \$50,000 at the beginning of the year and you put in an additional \$5,000 during that year, you would be charged fees of: \$795 *

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing Footnote '1' with:
"1 This includes indirect costs and has been calculated taking into account the indirect costs paid in the previous financial year ended 30 June 2021."
- Footnote '2' beneath the 'Example of annual fees and costs for the Fund' table is deleted and replaced as follows:
"2 The management costs are disclosed based on the financial year ended 30 June 2021."

Reference Guide Page 4:

- The 'Management costs' section in the Fees and costs table is updated by deleting and replacing the row beneath the heading 'Management costs' (above Service fees row) with the following:

The fees and costs for managing your investment ²	<ul style="list-style-type: none"> Sandhurst Conservative Fund: 1.51% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Balanced Fund: 1.55% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Growth Fund: 1.59% p.a.^{3,5} of the net asset value of the Fund. 	The management costs (including the management fee) are paid from the assets of the relevant Fund and are reflected in the unit price of the Fund. The management costs are calculated on the Fund's net asset value, accrued daily, and paid quarterly in arrears to Sandhurst following the end of the March, June, September and December quarters.
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- Footnote '5' beneath the 'Fees and Costs' table is deleted and replaced as follows:
"5 The management costs are disclosed based on the financial year ended 30 June 2021."

Reference Guide Page 5:

- Under the 'Additional explanation of fees and costs' heading, the table of 'Performance-related fees' is deleted and replaced with the following:

	Management costs (excluding performance related fees)	Performance-related fees (based on financial year ended 30 June 2021)	Total management costs (including performance related fees based on financial year ended 30 June 2021)
Sandhurst Conservative Fund	1.50%	0.01%	1.51%
Sandhurst Balanced Fund	1.54%	0.01%	1.55%
Sandhurst Growth Fund	1.57%	0.02%	1.59%

Product Disclosure Statement and Reference Guide updates

5 October 2021 – Complaints update

Sandhurst has revised its complaints handling process in accordance with standards and requirements for dispute resolution procedures that come into effect on 5 October 2021.

The below updates are made to the PDS.

PDS Page 8:

- Under the '8. How to apply' heading, the 'Complaints' section is deleted and replaced with the following:

"Resolving Complaints

We consider internal dispute resolution to be an important and necessary first step in the complaint handling process as it gives us an opportunity to hear when we do not meet our customer's expectations and address them genuinely, efficiently and effectively.

You can raise your complaint with us by:

- contacting us on 1800 634 969 (Monday to Friday 8.30 am to 5.00 pm, Melbourne time)
- emailing us at managedfunds@sandhursttrustees.com.au
- writing to us at:
Sandhurst Trustees Limited Funds Administration
GPO BOX 4314
Melbourne VIC 3001

If you are not satisfied with the response provided you can refer your complaint directly to the appropriate external dispute resolution scheme.

We are a member of the Australian Financial Complaints Authority (AFCA). You can contact AFCA at:

GPO Box 3
Melbourne Vic 3001
Telephone: 1800 931 678
Email: info@afca.org.au
Web: www.afca.org.au

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if, or when the time limit relevant to your circumstances expire."

1 July 2021 – Ongoing Advice Fee update

Legislation changes to the ongoing advice fee arrangement obligations will require a client's written consent to deduct ongoing advice fees and to renew an ongoing advice fee arrangement annually.

Reference Guide Page 5:

- Under the 'Advice fee' heading, the second paragraph is deleted and replaced with the following:

"The agreed amount will be deducted as follows and paid to your adviser:

- Deducted from your application monies at the time of application; and/or
- Deducted from your account on an ongoing basis if you provide the required consent form to your adviser.

Sandhurst will continue to deduct the ongoing advice fee and forward payments to your adviser unless we are notified by you or your adviser in writing to cancel this fee or a valid consent renewal notice is not received within 120 days of the anniversary of the commencement date of the fee arrangement. The fee you agree with your adviser is inclusive of GST."

Product Disclosure Statement and Reference Guide updates

31 December 2020 - Fees and costs update

Sandhurst has undertaken an annual review of the fees and costs in relation to the Fund's financial year ended 30 June 2020 and wishes to update the fees and costs disclosed in the PDS. (For the avoidance of doubt, all references in this section to "PDS" mean the Product Disclosure Statement for the Fund dated 30 January 2017 as updated by the earlier sections in this document.)

In addition, from 1 January 2021, to comply with legislation, Sandhurst will cease paying grandfathered conflicted remuneration to advisers, and will be passing on the benefit of reduced costs to investors by reducing the management fee for this Fund.

The below updates are made to the PDS.

PDS Page 6:

- The Fees and costs table is updated by deleting and replacing the last row with:

The fees and costs for managing your investment ²	1.586% p.a. ^{3,4} on the net asset value of the Fund.
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- A new Footnote '4' is added under the Fees and costs table, as follows:

⁴ The management costs are disclosed based on the financial year ended 30 June 2020. However, from 1 January 2021, the management fee will reduce appropriately to reflect that Sandhurst will cease paying grandfathered conflicted remuneration to advisers and will be passing on the benefit to investors.

PDS Page 7:

- Under the 'Transactional and operational costs' section, the fourth and fifth sentences are deleted and replaced with the following:

"However, some of these costs are recovered through investor buy/sell spreads (see below). The transactional and operational costs of the Fund for the past financial year were 0.37% of the net assets of the Fund (0.28% net of the buy/sell spread), which was materially higher than earlier financial years, largely as a result of volatility in financial markets.

Sandhurst expects the transactional and operational costs to be more in line with that of earlier financial years, and therefore estimates that the transactional and operational costs of the Fund, as a percentage of the net asset value of the Fund, will be as follows:"

Total estimated transactional and operational costs	Minus investor buy/sell spread recovery	Equals estimated net transactional and operational costs
0.14%p.a.	0.04%p.a.	0.10%p.a.

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing the last two rows with:

PLUS Management Costs	1.586%p.a. ^{1,2}	And , for every \$50,000 you have in the Sandhurst Growth Fund, you will be charged \$793 each year.
EQUALS Cost of Sandhurst Growth Fund		If you had an investment of \$50,000 at the beginning of the year and you put in an additional \$5,000 during that year, you would be charged fees of: \$793*

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing Footnote 1 with:

¹ This includes indirect costs and has been calculated taking into account the indirect costs paid in the previous financial year ended 30 June 2020.

- The 'Example of annual fees and costs for the Fund' table is further updated by adding a new Footnote '2' beneath the table, as follows:

² The management costs are disclosed based on the financial year ended 30 June 2020. However, from 1 January 2021, the management fee will reduce appropriately to reflect that Sandhurst will cease paying grandfathered conflicted remuneration to advisers and will be passing on the benefit to investors.

Product Disclosure Statement and Reference Guide updates

Reference Guide Page 4:

- The 'Management costs' section in the Fees and costs table is updated by deleting and replacing the row beneath the heading 'Management costs' (above 'Service fees' row) with the following:

The fees and costs for managing your investment ²	<ul style="list-style-type: none"> Sandhurst Conservative Fund: 1.550% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Balanced Fund: 1.569% p.a.^{3,5} of the net asset value of the Fund. Sandhurst Growth Fund: 1.586% p.a.^{3,5} of the net asset value of the Fund. 	The management costs (including the management fee) are paid from the assets of the relevant Fund and are reflected in the unit price of the Fund. The management costs are calculated on the Fund's net asset value, accrued daily, and paid quarterly in arrears to Sandhurst following the end of the March, June, September and December quarters.
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- A new Footnote '5' is added beneath the Fees and costs table, as follows:

⁵ The management costs are disclosed based on the financial year ended 30 June 2020. However, from 1 January 2021, the management fee will reduce appropriately to reflect that Sandhurst will cease paying grandfathered conflicted remuneration to advisers and will be passing on the benefit to investors.

Reference Guide Page 5:

- Under the 'Additional explanation of fees and costs' heading, the table of 'Performance-related fees' is deleted and replaced with the following:

	Management costs (excluding performance related fees)	Performance-related fees (based on financial year ended 30 June 2020)	Total management costs (including performance-related fees based on financial year ended 30 June 2020)
Sandhurst Conservative Fund	1.500%	0.050%	1.550%
Sandhurst Balanced Fund	1.500%	0.069%	1.569%
Sandhurst Growth Fund	1.500%	0.086%	1.586%

- The heading 'Adviser remuneration' and paragraphs between this heading and 'Alternative remuneration' section is deleted.

27 March 2020 – Change in buy/sell spread

The nature and volatility of current financial markets and the associated changes in liquidity of investments in those markets as a result of the COVID-19 pandemic has meant that the transaction costs incurred by the Fund in buying and selling assets of the Fund are now materially different to what has previously been the case.

So that the costs associated with buying and selling assets of the Fund in response to applications and withdrawals are fairly allocated, Sandhurst has today changed the buy/sell spread that applies to applications and withdrawals in respect of the Fund.

PDS Page 7:

- Under the heading titled 'Transactional and operational costs', the first paragraph is deleted and replaced with:

In addition to management costs, the Fund may incur transactional and operational costs when acquiring and disposing of certain Fund assets. These costs may include clearing costs, brokerage, stamp duty and buy/sell spreads. These costs are paid for by the Fund when they are incurred and are reflected in the Fund's unit price. These costs are not paid to Sandhurst as a fee and are not charged directly to investors, rather they are deducted from the income or assets of the Fund. These costs represented 0.10% of the Fund's net asset value for the past financial year, but Sandhurst expects that these costs will be materially different in the current financial year given the change in the nature and volatility of current financial markets as a result of the COVID-19 pandemic.

Product Disclosure Statement and Reference Guide updates

PDS Page 7 continued:

- Under the bullet point heading 'Investor buy/sell spread', the second paragraph is deleted and replaced with:

In light of the nature and volatility of current financial markets as a result of the COVID-19 pandemic, the buy spread that applies to each application and the sell spread that applies to each withdrawal is changed from time to time in response to the quantum of the costs associated with buying and selling Fund assets. As such, a buy spread of between 0.00% and 0.50% applies to each application and a sell spread of between 0.00% and 0.50% applies to each withdrawal. For example, if you invested \$50,000 in the Fund, the cost of the buy spread would be between \$0 and \$250. The buy/sell spread range may also change from time to time without prior notice. The Fund's current buy/sell spread can be found at www.bendigobank.com.au/personal/investing/managed-funds/fund-news. The Fund's application and withdrawal prices, which incorporate the buy/sell spread applicable from time to time, can be found at www.bendigobank.com.au/managedfundprices.

1 January 2020 - Fees and costs update

Sandhurst has undertaken an annual review of the fees and costs information disclosed in the PDS and Reference Guide in accordance with regulatory guidance.

The purpose of the review is to update fees and costs contained in the PDS and Reference Guide to reflect costs in relation to the financial year ended 30 June 2019 (instead of the financial year ended 30 June 2016). The review has considered any difference in fees and costs between the financial years ending 30 June 2016 and 30 June 2019 respectively and any information Sandhurst has received since 30 June 2019 to the date of this PDS update. Whilst no product fee changes were made by Sandhurst, there were changes in the cost incurred by Sandhurst in managing the Fund's assets. Changes in transactional and operational costs were identified.

Transactional and operational costs are generally expected to vary from year to year.

PDS Page 6:

- Under the 'Management costs' section, the third paragraph is deleted and replaced with the following:

"Indirect costs may include management costs charged by the investment managers of the underlying fund investments, including any applicable performance-related fees. Performance-related fees may be charged by an investment manager if they meet specific investment performance targets."
- Under the 'Performance fees' section, the following additional sentence is added:

'However, some investment managers may charge performance fees which form part of the indirect costs of the Fund.'

PDS Page 7:

- Under the 'Transactional and operational costs' section, the fourth and fifth sentences are deleted and replaced with the following:

These costs are not paid to Sandhurst as a fee and are not charged directly to investors, rather they are deducted from the income or assets of the Fund, however, some of these costs are recovered through investor buy/sell spreads (see below). The estimated transactional and operational costs, based on the Fund's net asset value for the past financial year are as follows:

Total estimated transactional and operational costs	Minus investor buy/sell spread recovery	Equals estimated net transactional and operational costs
0.14%p.a.	0.04%p.a.	0.10%p.a.

- The 'Example of annual fees and costs for the Fund' table is updated by deleting and replacing Footnote 1 with:

¹ This includes indirect costs and has been calculated taking into account the indirect costs paid in the previous financial year ending 30 June 2019.

Product Disclosure Statement and Reference Guide updates

Reference Guide Page 5:

- Immediately under the 'Additional explanation of fees and costs' heading a new section titled 'Performance-related fees' is inserted:

Performance-related fees

Some investment managers of the underlying funds charge performance-related fees. Performance-related fees form part of the indirect costs included in the management costs of the Funds. The actual management costs charged will vary as the actual performance-related fees charged will depend on the performance of the underlying investments over the period.

Performance-related fees provide an incentive for investment managers of the underlying funds to achieve superior performance. The Fund invests in a number of asset sectors and through a number of investment managers. This can mean an investment manager may earn a performance-related fee irrespective of the Fund's overall performance. Please note that past performance is not a reliable indicator of future performance and it is impossible to accurately forecast the performance-related fees that will be payable. Performance-related fees are accrued daily. The table below shows the management costs, exclusive and inclusive of performance-related fees for the Fund, based on the net asset value for the past financial year.

	Management costs (excluding estimated performance related fees)	Performance-related fees (estimated for 12-month period to 30 June 2019)	Total estimated management costs (including estimated performance-related fees)
Sandhurst Conservative Fund	1.500%	0.000%	1.500%
Sandhurst Balanced Fund	1.500%	0.000%	1.500%
Sandhurst Growth Fund	1.500%	0.000%	1.500%

31 May 2019 - Complaints update

The Financial Ombudsman Service Australia has been replaced by the Australian Financial Complaints Authority.

PDS Page 8:

- Under the 'Complaints' heading, the last sentence is deleted and replaced with the following:
"If you are not satisfied with the handling of your complaint, or the complaint is not dealt with within 45 days, you may contact the Australian Financial Complaints Authority on 1800 931 678, info@afca.org.au or www.afca.org.au for further information."

16 June 2017 - Switching between managed funds

Sandhurst has made it easier for customers to change their investments by introducing the ability to switch between most of Sandhurst's managed funds.

PDS Page 3:

- Under the 'Switching and transfers' section, the first sentence is replaced with the following sentence:
"You may switch from the Fund to other funds operated by Sandhurst and which are listed on the Switch Form (available from our website at www.bendigobank.com.au/managedfundsforms)."