

# Continuous Disclosure Guide

## Skyring Platinum Fixed Income Fund

ARSN 646 317 982

### Important Notice and Disclaimer

As responsible entity of the Skyring Platinum Fixed Income Fund ARSN 646 317 982 (Trust or Fund), Skyring Asset Management Limited ABN 92 156 533 041 (Skyring or Us or We) is the issuer of this update disclosure guide (Guide) which should be read in conjunction with the Product Disclosure Statement (PDS) dated 22 February 2021 (repealed) and the Supplementary PDS (SPDS) dated 30 September 2022 (repealed) and the product disclosure statement dated 01 June 2024 collectively referred to as the Product Disclosure Statement (PDS). All figures and events referred to in this Guide are accurate as at 31 December 2024, unless stated otherwise.

Information in this Guide is general information only and does not take into account your objectives, financial situation or needs. Therefore, in deciding whether to acquire or continue to hold an investment you should consider the PDS, and Guides to it carefully and assess, with or without your financial or taxation adviser, whether the product meets your objectives, financial situation or needs.

### Scope of this Disclosure Guide for Unlisted Mortgage Schemes

The Australian Securities and Investments Commission (ASIC) issues regulatory guides (RGs) to assist regulated entities, of which Skyring is one, by publishing practical guidance on ASIC's explanation on how they apply the law together with describing the principles under which ASIC approach to interpretation of the Corporations Act (2001) provisions and regulations. These regulatory guides set out particular disclosure principles and benchmarks designed to provide improved disclosure to retail investors to help them compare risks and returns across investments in the unlisted mortgage scheme sector.

ASIC has developed 8 benchmarks and 8 disclosure principles for unlisted mortgage schemes to assist retail investors to understand the risks, assess the rewards being offered and decide on whether these investments are suitable for them. These benchmarks apply to schemes, which have, or are likely to have, at least 50% of their non-cash assets invested in loans that are secured by mortgage over real property and/or unlisted mortgage schemes.

The benchmarks and disclosure principles are designed to help retail investors to understand the risks, assess the potential rewards and to make an informed investment decision.

Although the fund is not an unlisted mortgage scheme, it invests solely in Notes issued by Skyring Securities Pty Ltd and Skyring Securities uses these proceeds to provide loans, and will rely on interest payments and loan repayments by borrowers to meet its obligations to make coupon payments on, and to redeem, Notes.

Accordingly, the underlying investment exposure of an investment in the Fund is akin to an investment in a mortgage scheme. Consequently, we have included details in relation to ASIC’s benchmarks and disclosure principles as they apply to Skyring Securities’ business and, where applicable, the Fund, to assist investors in making an informed decision about whether or not to retain an investment in the fund. However, this section does not contain all the disclosure principle information, which would be required to be in a product disclosure statement for an unlisted Mortgage Scheme.

Set out below are tables, which list each benchmark and disclosure principles and whether relevant information is included in this Guide and the PDS and SPDS.

### Benchmark & Disclosure Principles

Benchmark	Statement	Explanation	Reference
<b>Benchmark &amp; Disclosure Principle 1: Liquidity</b>			
For a pooled mortgage scheme, the responsible entity should have cash flow estimates for the scheme that: (a) demonstrate the scheme’s capacity to meet its expenses, liabilities and other cash flow needs for the next 12 months; (b) are updated at least every three months and reflect any material changes; and (c) are approved by the directors of the responsible entity at least every three months.	This benchmark is met by the Fund and Skyring Securities	We have cash flow estimates for the Fund, which meets these requirements. Skyring Securities maintains cash flow estimates, which are consistent with these requirements and are approved by Skyring Securities’ board at least every three months.	Section 4.3 of the PDS
<b>Benchmark &amp; Disclosure Principle 2: Scheme Borrowing</b>			
The Responsible Entity should not have current borrowings and should not intend to borrow on behalf of the scheme	This benchmark is met by the Fund and Skyring Securities	The Fund does not have any borrowings and we do not intend to enter into any borrowing arrangements on behalf of the Fund. Further, Skyring Securities does not intend to have any borrowings other than the Notes.	Section 4.4 of the PDS
<b>Benchmark &amp; Disclosure Principle 3: Loan Portfolio &amp; Diversification</b>			
For a pooled mortgage scheme: (a) the scheme should hold a portfolio of assets diversified by size, borrower, class of borrower activity and geographic region; (b) the scheme should have no single asset in the scheme portfolio that exceeds 5% of the total scheme assets; (c) the scheme should have no single borrower who exceeds 5% of the scheme assets; and (d) all loans made by the scheme should be secured by first mortgages over real property (including registered leasehold title).	This benchmark is not met	Skyring Securities will not have a diversified portfolio of assets until the total value of the loan portfolio exceeds \$100 million. Until such time, there will be no limitation on the size of any single loan transaction by Skyring Securities as a percentage of the total value of the loan portfolio nor on the aggregate exposure to a single borrower. Once the total value of the loan portfolio exceeds \$100 million, Skyring Securities intends to satisfy items (a) and (b) of this benchmark	Section 4.5 of the PDS

Benchmark	Statement	Explanation	Reference
		<p>but will not meet items (c) and (d). For benchmark (c), Skyring Securities will ensure no single loan and no single borrower exceeds 10% of the total value of its assets and loan portfolio.</p> <p>For benchmark (d), for loans made for residential, commercial, retail and industrial property development, construction or acquisition, Skyring Securities will hold either a first or second mortgage over real property. Where a second mortgage is granted, it will only be where the first registered mortgage is held by either Skyring Securities or a related company, Skyring Capital Pty Ltd to ensure that Skyring Asset Management Ltd, as responsible entity, holds ultimate control of the secured asset.</p> <p>Loans for business growth and acquisitions will be secured over the assets of the borrower's business and possibly by first mortgages over real property.</p>	
<b>Benchmark &amp; Disclosure Principle 4: Related Party Transactions</b>			
The responsible entity should not lend to related parties of the responsible entity or to the scheme's investment manager.	This benchmark is not met	The Notes are a debt instrument and Skyring Securities is a related party of the Responsible Entity. Skyring Securities may make loans to our related parties, including other managed investment schemes we operate (but excluding our directors and officers). Any loans to related parties will be on the same commercial basis as loans to unrelated parties in accordance with Skyring Securities' Lending Policy.	Section 4.6 and 5 of the PDS
<b>Benchmark &amp; Disclosure Principle 5: Valuation Policy</b>			
In relation to valuations of the scheme's mortgage assets and their security property, the board of the responsible entity should require: (a) a valuer to be a member of an appropriate professional body in the jurisdiction in which the relevant property is located; (b) a valuer to be independent;	This benchmark is met by Skyring Securities	Skyring Securities meets the benchmark for loans secured by a registered mortgage over real property, as it will obtain valuations of real property security as required in accordance with its Lending Policy, which is consistent with this benchmark. For loans secured over assets other than real	Section 4.7 and 5 of the PDS

<b>Benchmark</b>	<b>Statement</b>	<b>Explanation</b>	<b>Reference</b>
(c) procedures to be followed for dealing with any conflict of interest; (d) the rotation and diversity of valuers; (e) in relation to security property for a loan, an independent valuation to be obtained: (i) before the issue of a loan and on renewal, for development property, on both an 'as is' and 'as if complete' basis and, for all other property, on an 'as is' basis; and (ii) within two months after the directors form a view that there is a likelihood that a decrease in the value of security property may have caused a material breach of a loan covenant.		property (such as a general security interest over a borrower's assets) Skyring Securities will implement procedures to assess the adequacy of the security provided in accordance with its Lending Policy, as it will generally not be possible for a valuation of those assets to be undertaken by a registered valuer. The Fund has not, and will not, obtain a valuation of Skyring Securities prior to investing in Notes.	
<b>Benchmark &amp; Disclosure Principle 6: Lending Principles – Loan to Valuation Ratios</b>			
If the scheme directly holds mortgage assets: • where the loan relates to property development – funds should be provided to the borrower in stages based on independent evidence of the progress of the development; • where the loan relates to property development – the scheme should not lend more than 70% on the basis of the latest 'as if complete' valuation of property over which security is provided; and • in all other cases – the scheme should not lend more than 80% on the basis of the latest market valuation of property over which security is provided.	This benchmark is not met by Skyring Securities	The Fund's constitution and Skyring Securities' Lending Policy allow for loans with an LVR of up to 80% for loans secured by a registered mortgage over real property. For loans secured over assets other than real property, Skyring Securities may lend on an LVR of up to 80% of the value of the assets securing the loan (such as the assets of a business acquired by the borrower).	Section 4.8 and 5 of the PDS
<b>Benchmark &amp; Disclosure Principle 7: Distribution Practices</b>			
The Responsible entity should not pay current distributions from scheme borrowings.	This benchmark is met by the Fund and Skyring Securities	Distributions by the Fund to investors will be sourced from coupon payments made by Skyring Securities and not from Fund borrowings (as the Fund will not borrow). Coupon payments from Skyring Securities to the Fund will be sourced from interest payments from borrowers and not from Skyring Securities borrowings (as Skyring Securities does not intend to have any borrowings other than the Notes).	Section 4.9 of the PDS
<b>Benchmark &amp; Disclosure Principle 8: Withdrawal Arrangements</b>			
For liquid schemes: (a) the maximum period allowed for in the Constitution for the payment of all requests should be 90 days or less;	This benchmark is not met	Withdrawal Offers will be made to investors quarterly only where eligible investors submit a participation notice.	Section 4.10 of the PDS

Benchmark	Statement	Explanation	Reference
<p>(b) the responsible entity should pay withdrawal requests within the period allowed for in the Constitution; and</p> <p>(c) the responsible entity should only permit members to withdraw at any time on request if at least 80% (by value) of the scheme property is money in an account or on deposit with the bank and is available for withdrawal immediately (or otherwise on expiry of a fixed term not exceeding 90 days), during normal business hours of the bank; or assets that the responsible entity can reasonably expect to realise for market value within 10 business days.</p> <p>For non-liquid schemes, the responsible entity should make withdrawal offers to investors at least quarterly.</p>			

A summary of the loans as at the date of this continuous disclosure notice is as follows:

<b>Loan Facility by Security Type</b>			
	Facility \$	Portfolio %	Number
Commercial Property	0	0%	-
Residential Development	8,107,611	78%	7
Residential Property	0	0	-
NDIS Property Development	2,248,500	22%	3
NDIS Property	0	0%	-
Other	0	0%	-
Rural Property	0	0%	-
Total	10,356,111	100%	10

<b>Loan Facility by Security Location</b>			
	Facility \$	Portfolio %	Number
Sydney and Surrounds	752,690	7%	1
Brisbane & Surrounds	3,739,000	36%	4
Greater SEQ	0	0%	-
Greater Whitsunday Region	4,455,400	43%	2
Western Downs QLD	0	0%	-
Central Coast NSW	0	0%	-
Gold Coast	931,094	9%	1
South Australian Murray - Darling Basin	227,927	2%	1
Central Queensland	250,000	2%	1
Total	10,356,111	100%	10

<b>Loan Facility on Issue</b>			
	Facility \$	Portfolio %	Number
< \$1,000,000	4,245,211	41%	8
\$1,000,000 - \$3,000,000	1,827,000	18%	1
\$3,000,000 - \$6,000,000	4,283,900	41%	1
> \$6,000,000	0	0%	-
Total	10,356,111	100%	10

<b>Loan Facility to Value Ratio</b>			
	Facility \$	Portfolio %	Number
<= 50%	8,544,684	83%	6
51% - 60%	227,927	2%	1
61% - 70%	560,000	5%	1
70% - 80%	1,023,500	10%	2
> 80%	0	0%	-
Total	10,356,111	100%	10

<b>Loan Maturity</b>			
	Facility \$	Portfolio %	Number
Overdue	0	0%	-
< 3 months	787,927	8%	2
3 - 6 months	5,708,090	55%	4
6 - 9 months	1,783,094	17%	2
9 - 12 months	250,000	2%	1
> 12 months	1,827,000	18%	1
Total	10,356,111	100%	10

**Default Management:**

At the date of this document, no loans issued by Skyring Securities were in default.