

NOTICE OF FILING

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File Title:	AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION v MWL FINANCIAL SERVICES PTY LTD
Registry:	VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink, reading "Sia Lagos". The signature is fluid and cursive, with the first letters of "Sia" and "Lagos" being capitalized and prominent.

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



Statement of claim

No. VID245 of 2026

Federal Court of Australia
District Registry: Victoria
Division: General

AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

Plaintiff

MWL FINANCIAL SERVICES PTY LTD (in liquidation) and others named in the Schedule

Defendants

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A. PARTIES

1. The plaintiff (**ASIC**):
 - (a) is a body corporate established by s 7(1)(a) of the *Australian Securities Commission Act 1989* (Cth); and
 - (b) is entitled to commence and maintain this proceeding in its corporate name under s 8(1)(d) of the *Australian Securities and Investments Commission Act 2001* (Cth) (the **ASIC Act**).

2. The first defendant, **MWL Financial Services Pty Ltd** (in liquidation):
 - (a) is a body corporate registered under the *Corporations Act 2001* (Cth) (the **Act**) and is capable of being sued;
 - (b) is, and was at all material times, a wholly owned subsidiary of **MWL Financial Group Pty Ltd**;
 - (c) was at all material times, including between 6 May 2022 and 2 February 2024 (**Relevant Period**), and up to 25 August 2025, the holder of Australian Financial Services Licence (No 235096) (**AFSL**) and a financial services licensee (within the meaning of the Act);
 - (d) at all material times, including during the Relevant Period, carried on a financial services business;
 - (e) had voluntary administrators appointed pursuant to s 436A of the Act on or about 29 September 2025; and
 - (f) was placed into liquidation on or about 21 November 2025 following a resolution for voluntary winding up.

3. The second defendant, Imperial Capital Group Australia Pty Ltd (**ICGA**):
 - (a) is a body corporate registered under the Act and is capable of being sued; and
 - (b) at all material times, including during the Relevant Period, carried on a marketing and referrals business, including by way of internet advertising and operating a call centre.

4. The third defendant, Nicholas **Maikousis** was, at all material times, including during the Relevant Period, the Managing Director of MWL.

B. MWL

B1. Managing Director

5. Maikousis was:

- (a) the Managing Director of MWL from 8 December 2014;
- (b) the responsible manager of MWL from 18 April 2017 to 19 December 2019;
- (c) a member of MWL's investment committee and compliance committee; and
- (d) responsible for the overall operations of MWL and overseeing most aspects of its business and the business of the MWL Finance Group.

B2. MWL Representatives

6. MWL's financial advice business was carried on by authorising individuals in accordance with s 916A of the Act and employing individuals to provide financial product advice including personal advice (within the meaning of s 766B of the Act) regarding superannuation products to retail clients (within the meaning of s 761G of the Act).

Particulars

The relevant individuals authorised and employed by MWL are set out in paragraphs 7 and 11 below and, together, are referred to as the **MWL Representatives**.

B3. MWL Authorised Representatives

7. MWL authorised the following individuals, in accordance with s 916A of the Act, to provide personal financial product advice, including advice in relation to superannuation products, to retail clients:

- (a) JM, authorised from 1 May 2017;
- (b) RD, authorised from 5 June 2017;
- (c) MB, authorised from 11 October 2017;
- (d) RC, authorised from 20 November 2018;
- (e) WS, authorised from 24 May 2021;

- (f) PY, authorised from 20 June 2022 to 9 June 2023; and
- (g) PS, authorised from 19 September 2023

(the **MWL Authorised Representatives**).

8. The MWL Authorised Representatives were “representatives” of MWL within the meaning of s 9 of the Act.
9. JM, RD, MB and RC were each entitled, under and subject to the terms of agreements with MWL, to receive 50 per cent of the revenue received by MWL in respect of their client base, by way of commission.

Particulars

- i. Agreement between MWL and JM dated 10 May 2017 [Q2T.0060.0001.0122].
 - ii. Agreement between MWL and RD dated 5 June 2017 [Q2T.0035.0001.0023].
 - iii. Agreement between MWL and MB dated 20 December 2017 [Q2T.0060.0001.0167].
 - iv. Agreement between MWL and RC dated 20 November 2018 [Q2T.0060.0001.0240].
10. WS, PY and PS:
 - (a) were employed by MWL;
 - (b) were paid an annual salary; and
 - (c) received a bonus payment for each new client they introduced to MWL.

B4. MWL Employee Representatives

11. MWL employed the following individuals, who were not authorised representatives within the meaning of s 916A of the Act:
 - (a) Jovan **Videkanic**, employed as Business Development Manager and Advisor from 14 February 2022; and
 - (b) **RT**, employed as Financial Planner from 1 June 2022

(the **MWL Employee Representatives**).

12. The MWL Employee Representatives were “representatives” of MWL within the meaning of s 9 of the Act.
13. The MWL Employee Representatives’ responsibilities included:
 - (a) providing advice to 10 to 20 clients referred by telemarketers each month, for Videkanic;
 - (b) providing advice to 15 to 20 clients referred by telemarketers each month, for RT; and
 - (c) for RT, who did not have an existing client base when she started at MWL, supporting the Low Cost Advice Project described at paragraphs 54 to 59 below.
14. By way of remuneration from MWL:
 - (a) Videkanic was entitled to an annual salary (which increased during the Relevant Period) and \$1,000 per new client completion/implementation, with an advance of \$8,333 per month for completions generated by ICGA;
 - (b) RT was entitled to an annual salary and an incentive of \$250 when a client rolled their superannuation over into the recommended fund; and
 - (c) MWL had a discretion to make annual bonus payments if an MWL Employee Representative achieved certain benchmarks.

B5. Corporate authorised representative

15. From 27 April 2023 to 23 August 2024, National Eqty Partners Pty Ltd (**NEP**) was a corporate authorised representative of MWL, authorised in accordance with s 916A of the Act.

C. ICGA

16. Daniel **Walker** was the sole named director of ICGA from 11 September 2018 to 3 February 2021.
17. Amanda **Willis** was the sole named director of ICGA from 3 February 2021 to 2 August 2021.
18. Lucas **McKenna** was the sole named director of ICGA from 2 August 2021 to 6 November 2023.

19. Adam **Gilmore** is, and has since 6 November 2023 been, the sole named director of ICGA.

20. During the Relevant Period, Walker was the sole named director of:

- (a) **Empire** Property Group (Aust) Pty Ltd, a company that sold investment properties; and
- (b) **ADA** Empire Holdings Pty Ltd, the sole shareholder of Empire.

21. At all material times, Gilmore, Willis and Walker:

- (a) were the ultimate owners of ICGA;

Particulars

The shareholders of ICGA are, and were at all material times:

- i. **Walker Corporate** Services Pty Ltd, solely owned and controlled by Walker;
- ii. **Willis Corporate** Services Pty Ltd, solely owned and controlled by Willis;
- iii. **Gilmore Corporate** Services Pty Ltd, solely owned and controlled by Gilmore.

- (b) were the ultimate owners of Empire; and

Particulars

ADA is the sole shareholder of Empire. The shareholders of ADA are Walker Corporate, Willis Corporate and Gilmore Corporate. The shares in ADA were previously held directly by Walker, Willis and Gilmore.

- (c) made operational and management decisions for ICGA.

Particulars

- i. From in or around 2022 to no later than March or April 2023, Gilmore, Willis and/or Walker held weekly meetings with the General Manager of ICGA to make decisions about ICGA's business, including compliance, staffing, and call scripts.
- ii. At all material times, Gilmore, Willis and/or Walker communicated operational and financial directions concerning ICGA to McKenna and others at ICGA, on which directions McKenna and others typically acted.

Further particulars may be provided after the filing of evidence.

22. At all material times, ICGA employed individuals as “information officers” to staff its call centre for the purposes of ICGA’s marketing and referrals business (**Information Officers**).

Particulars

The Information Officers during the Relevant Period were:

- i. ALO (Sales Manager);
- ii. AB;
- iii. AO;
- iv. AL;
- v. BY;
- vi. CS;
- vii. CP;
- viii. EG;
- ix. GV;
- x. HH;
- xi. JW;
- xii. KM;
- xiii. DB;
- xiv. LG;
- xv. SH;
- xvi. SK;
- xvii. CB;
- xviii. SHA;
- xix. NM;
- xx. OW (Sales Manager); and
- xxi. RK.

23. During the period from 21 July 2021 to 15 May 2023, some of the Information Officers were authorised representatives of **Keystone** Asset Management Ltd (now in liquidation).

Particulars

The following Information Officers were authorised representatives of Keystone during the period from 21 July 2021 to 15 May 2023:

- i. ALO;
- ii. AB;
- iii. AO;
- iv. AL;
- v. BY;
- vi. CP;
- vii. CM;
- viii. EG;
- ix. GV;
- x. JW;
- xi. KM;
- xii. SHA; and
- xiii. NM.

D. SHIELD MASTER FUND

D1. Establishment of Shield

24. The **Shield** Master Fund:

- (a) was a managed investment scheme (ARSN: 650 112 057) registered on 24 May 2021;
- (b) had four investment products, described as “classes” (Conservative, Balanced, Growth and High Growth), all of which were available no later than 6 May 2022 for investment on the Macquarie Wrap platform, a superannuation investment administration service in respect of which Macquarie Investment Management Ltd was the trustee.

25. Each of the four classes of Shield was a “financial product” within the meaning of s 763A of the Act.

26. At all material times:

- (a) Keystone was the responsible entity of Shield; and
- (b) **CF Capital** Investments Pty Ltd (now in liquidation) was the investment manager for Shield and a corporate authorised representative of Keystone.

27. Paul **Chiodo** was:

- (a) a director of Keystone from 27 April 2020 to 27 May 2024;
- (b) a shareholder of CF Capital from 10 May 2019;
- (c) a director of CF Capital from 10 May 2019 to 17 June 2024; and
- (d) a director of **Chiodo Corporation** Pty Ltd since 18 March 2016.

28. Ilya **Frolov** was:

- (a) a director of Keystone from 27 April 2020 to 29 December 2023; and
- (b) a director of CF Capital from 10 May 2019 to 29 December 2023.

29. Louie **Kortesis**:

- (a) was a director of Keystone from 29 December 2023 to 14 November 2024;
- (b) was a Senior Accounting Manager and, from 17 March 2015 to 26 March 2020, a director of MWL Accounting Pty Ltd (a related entity of MWL); and
- (c) had, from around 2014, Chiodo Corporation as an accounting client.

D2. The Shield investment products

Product Disclosure Statements

30. From around 8 September 2021 until the end of the Relevant Period, Keystone as the responsible entity of Shield issued product disclosure statements (**PDSs**) for each Shield investment product as follows:

- (a) for the Conservative, Balanced and Growth classes, on or about 8 September 2021, and for the High Growth class, on or about 12 October 2021 (the **2021 PDSs**);

- (b) for the Conservative, Balanced, Growth and High Growth classes, on or about 3 November 2021 (the **2021 Supplementary PDSs**);
- (c) for the Conservative, Balanced, Growth and High Growth classes, on or about 4 April 2022 (the **2022 Supplementary PDSs**); and
- (d) for the Conservative, Balanced, Growth and High Growth classes, on or about 1 July 2023 (the **2023 PDSs**).

Particulars

- i. 2021 PDSs: [KSS.0210.0002.5781] (Conservative);
[KSS.0210.0002.5755] (Balanced); [KSS.0210.0002.5729] (Growth);
[KSS.0210.0002.8086] (High Growth).
- ii. 2021 Supplementary PDSs: [KSS.0210.0003.1547] (Conservative);
[Q2T.0038.0001.2026] (Balanced); [Q2T.0038.0001.2058] (Growth);
[Q2T.0038.0001.2090] (High Growth);
- iii. 2022 Supplementary PDSs: [KSS.0210.0006.9285] (Conservative);
[Q2T.0019.0001.4941] (Balanced); [Q2T.0019.0001.8545] (Growth);
[Q2T.0019.0001.3598] (High Growth).
- iv. 2023 PDSs: [KSS.0210.0013.3426] (Conservative);
[KSS.0210.0013.3588] (Balanced); [KSS.0210.0013.3507] (Growth);
[KSS.0210.0013.3669] (High Growth).

31. The 2021 PDSs:

- (a) stated that the product should be considered as:
 - (i) a “medium” risk investment (for the Conservative class);
 - (ii) a “medium-high” risk investment (for the Balanced class); or
 - (iii) a “high” risk investment (for the Growth and High Growth classes);
- (b) stated that the product was “not intended as a complete investment program”;
- (c) stated that the product was “designed for investors who can bear the economic risks of the loss of their investment and who recognise that in certain market environments it is likely that there will be constraints on liquidity”;
- (d) stated that the product “will provide investors predominantly with exposure to growth assets, such as listed Australian/International investments, real assets such as precious metals, commodities, real estate, land, equipment and natural resources, and alternative assets being those other fall outside the principal asset

classes (equities, real property, fixed interest and cash) and can include exposure to hedge funds, managed futures, distressed assets, digital assets and private equity. Investors can also be exposed to more defensive assets such as fixed income, cash and cash equivalents where considered appropriate”;

- (e) stated that the product “may also invest in Underlying Assets for which the Investment Manager and or the Responsible Entity also provides services”, which “could include the Property Development Asset Class of the Shield Master Fund”;
- (f) identified:
 - (i) “target exposure allocations” for “asset categories” (being either “Growth Assets” or “Defensive Assets”) and “asset classes” (being “Listed Equities”, “Real Assets”, “Alternatives”, “Fixed Interest” and “Cash”); and
 - (ii) “allowable ranges” for asset classes; and
- (g) stated that each product “may, without limitation, invest in other Classes in the Fund or funds of which we, or a related entity, are trustee, responsible entity or manager” and “may appoint any of our related entities to provide services or perform functions in relation to the Fund and/or” the class.

32. The 2022 Supplementary PDSs:

- (a) stated, for each Shield investment product, that it supplemented the 2021 PDS and must be read together with the 2021 PDS and any other supplementary PDS;
- (b) in relation to asset allocations, removed corresponding statements contained in the 2021 PDS and replaced them, with the effect of:
 - (i) introducing “allowable ranges” for asset categories; and
 - (ii) amending the “allowable ranges” for certain asset classes, so as to increase the “allowable range” of exposure to “Listed Equities”, “Real Assets” and “Alternatives”.

33. The 2023 PDSs:

- (a) stated that the product should be considered as:
 - (i) a “medium” risk investment (for the Conservative class);
 - (ii) a “medium to high” risk investment (for the Balanced class); or

- (iii) a “high” risk investment (for the Growth and High Growth classes);
- (b) stated that the product “should be seen as a high risk and longer term investment”;
- (c) stated that “[t]he range of asset types to which the Fund and so investors is ultimately exposed is potentially very broad, that includes all the principal asset classes as well as alternative investments, real assets and real property”;
- (d) stated that “certain underlying funds are inherently illiquid particularly those relating to real property development”;
- (e) stated that “[i]t is unlikely that the Fund would by itself sensibly make up the whole or majority of an investor’s investment portfolio. Indeed, by itself it is unlikely to be appropriate as a standalone solution of a portfolio, it being more likely better placed as a ‘minor’, ‘satellite’ or ‘core’ investment, with an option as a ‘major’ allocation, based on your risk levels”;
- (f) identified “target exposure” and “target ranges” for asset classes;
- (g) did not identify target exposure allocations or target ranges for asset categories; and
- (h) was accompanied by a target market determination that recommended against the product being a “standalone solution” above 75 per cent allocation.

SQM research reports

34. **SQM Research Pty Ltd** published research reports regarding Shield:

- (a) on or about 6 October 2021 (the **October 2021 SQM Report**);
- (b) on or about 26 October 2022 (the **October 2022 SQM Report**); and
- (c) on or about 17 January 2024 (the **January 2024 SQM Report**).

Particulars

- i. October 2021 SQM Report: [Q2T.0012.0001.0130].
- ii. October 2022 SQM Report: [Q2T.0038.0001.2002].
- iii. January 2024 SQM Report: [Q2T.0038.0001.2246].

35. The October 2021 SQM Report:

- (a) stated that SQM had received a fee from the fund manager for the report and rating (Introduction);
- (b) stated that Shield had achieved a rating of “3.75 stars” for the Conservative, Balanced and Growth classes, which was described:
 - (i) as “Favourable” and “Consider for APL [approved product list] inclusion”; and
 - (ii) as corresponding to an investment grading of “Approved” (p 3);
- (c) stated that “[t]he Advantage Diversified Property Class (20% of the Fund) invests in the wholesale Chiodo Diversified Property Fund” of which CF Capital was the investment manager (p 4);
- (d) stated that, “[a]s a new Fund, there is no reportable track record” for Shield (p 4);
- (e) stated, as “[w]eaknesses”, that:
 - (i) Shield was a new Fund and “no performance and analysis can [be] made”; and
 - (ii) “[w]ith regards to Governance”, CF Capital (as fund manager) and Keystone (as responsible entity) “share common members, and a number of related party relationships exist” (p 5); and
- (f) stated that 20 per cent of the Fund comprised “Unlisted Property” (p 17).

36. The October 2022 SQM Report:

- (a) stated that SQM had received a fee from the fund manager for the report and rating (Introduction);
- (b) stated that Shield had achieved a rating of “3.75 stars” for the Conservative, Balanced, Growth and High Growth classes, which was described:
 - (i) as “Favourable” and “Consider for APL inclusion”; and
 - (ii) as corresponding to an investment grading of “Approved” (p 3);

- (c) stated that:
 - (i) the direct property component “invests in the Advantage Diversified Property Fund (‘ADPF’), a wholesale fund also managed by [CF Capital]”; and
 - (ii) that ADPF “invests in individual property development and financing projects, which have historically been highly concentrated in the residential property sector and have been managed by a related party (Chiodo Corporation)” (p 5);
- (d) stated that:
 - (i) Shield “does not have a sufficient performance history on which to comment”; and
 - (ii) Shield’s Balanced product “has a relatively short history of 0.5 years (or 6 months) since it made its initial investments. Observations and analysis of returns will have almost no statistical meaning” (p 5);
- (e) stated, as “[w]eaknesses”, that:
 - (i) Shield was a new Fund and “no performance analysis can be made”; and
 - (ii) “[w]ith regards to Governance”, CF Capital (as fund manager) and Keystone (as responsible entity) “share common members, and a number of related party relationships exist” (p 6); and
- (f) stated that, as at the end of August 2022, 48 per cent of the assets of the Fund comprised “Alternatives” (p 18).

37. The January 2024 SQM Report:

- (a) stated that SQM had received a fee from the fund manager for the report and rating (Introduction);
- (b) downgraded Shield to a rating of “3.50 stars” for the Conservative, Balanced, Growth and High Growth classes, which was described:
 - (i) as “Acceptable” and “Consider for APL inclusion”; and
 - (ii) as corresponding to an investment grading of “Low Investment Grade” (p 3);

- (c) stated that:
 - (i) the direct property component “invests in the Advantage Diversified Property Fund (‘ADPF’), a wholesale fund also managed by CF Capital”; and
 - (ii) ADPF “invests in individual property development and financing projects, which have historically been highly concentrated in the residential property sector and have been managed by a related party (Chiodo Corporation)” (p 5);
- (d) stated that Shield’s Growth product “has a relatively short history of 1.5 years. Observations and analysis of returns will have very little statistical meaning” (p 6); and
- (e) stated, as “[w]eaknesses”, that:
 - (i) “[w]ith regards to Governance”, CF Capital (as fund manager) and Keystone (as responsible entity) “share common members, and a number of related party relationships exist” (p 6);
 - (ii) “The Manager and/or the RE/Trustee are arguably under-resourced or do not have sufficient operational and compliance experience/expertise, resulting in oversight, which may expose the Fund to unnecessary risk” (p 6), and SQM believes that “this oversight has exposed the Fund to unnecessary risk” (p 7);
 - (iii) “The Direct Property component of the Fund is significantly higher than other peers”, being 48.3 per cent for the Growth product as at January 2024, “and may be a mismatch for some clients” (p 6);
 - (iv) “the exposure is relatively concentrated in assets with very little liquidity” (p 7); and
 - (v) SQM believes that “key person risk exists in CF Capital principals Ilya Frolov and Paul Chiodo” (p 7).

Adverse developments

38. By no later than September 2022, MWL (through Maikousis) was aware that the investment allocations within Shield had changed such that its exposure to the ADPF had increased.

Particulars

- i. Emails between MWL and CF Capital dated July and August 2022
[Q2T.0045.0001.0249; Q2T.0038.0001.2587; Q2T.0038.0001.3137]
- ii. Emails between MWL and CF Capital dated November 2022
[Q2T.0038.0001.2927].
- iii. Emails between MWL and CF Capital dated October 2023
[Q2T.0038.0001.2581].
- iv. MWL Investment Committee Summary dated July 2023
[Q2T.0036.0001.0064].
- v. MWL Investment Committee Summary dated January 2024
[Q2T.0036.0001.0037].

- 39. On or about 5 June 2023, Macquarie Wrap ceased to accept new applications for Shield, although it remained available for investment through the NQ Super and Super Simplifier platforms.
- 40. On or about 1 July 2023, Keystone issued a target market determination for each of the four Shield investment products which recommended against the product being a “standalone solution” above 75 per cent allocation.

Particulars

Target Market Determinations dated 1 July 2023 for Conservative Class, Balanced Class, Growth Class and High Growth Class.

- 41. During the Relevant Period, no reasonable and competent financial adviser could have recommended that any retail client invest a significant proportion of their superannuation in Shield having regard to:
 - (a) the matters referred to in paragraphs 31 to 40 above at or about the time they occurred;
 - (b) the circumstance that Shield was a new fund with an unproven track record;
 - (c) the circumstance that the PDSs:
 - (i) did not adequately identify the allocation of investment assets; and
 - (ii) contained allowable “ranges” for asset categories or asset classes that were inappropriate or unreasonably wide;

- (d) the circumstance that the PDSs and the SQM Reports disclosed that the Shield investment products had potentially significant exposure to risky and/or illiquid investments, such as property developments; and
- (e) the circumstance that the PDSs and the SQM Reports disclosed the existence of related party relationships or dealings which created potential conflicts of interest, including exposure to the ADPF, which:
 - (i) was an unregistered managed investment scheme limited to wholesale clients for which Keystone was the trustee and Chiodo Corporation was the property developer; and
 - (ii) had interests in real property developments managed by Chiodo Corporation.

42. During the Relevant Period, MWL knew or ought to have known:

- (a) of the matters referred to in paragraphs 31 to 40 above at or about the time they occurred; and

Particulars

The knowledge is to be inferred from matters including the following:

- i. On 28 May 2021, Frolov sent Maikousis the PDS dated 28 April 2021 for the Shield Growth class: Email from Frolov to Maikousis dated 28 May 2021 at 1:27pm [Q2T.0040.0001.6209; Q2T.0040.0001.6223].
- ii. On 17 June 2021, Frolov sent Maikousis the final draft PDS for each class of Shield: Email from Frolov to Maikousis dated 17 June 2021 at 3:48pm [Q2T.0038.0001.4418].
- iii. On 18 November 2021, Frolov provided the following documents to Maikousis:
 - a. the October 2021 SQM Report; and
 - b. the 2021 Supplementary PDSs for each of the Shield Conservative, Growth and Balanced classes: Email from Frolov to Maikousis dated 18 November 2021 at 10:27am [MAC.0003.0001.0089].
- iv. By no later than March 2022, Maikousis had reviewed the October 2021 SQM Report: see Letter from Maikousis to Macquarie Group Ltd dated 11 March 2022, stating that the investment committee had reviewed “the external rating of ‘favourable’ investment grade” given by SQM [MAC.0003.0001.0088].

- v. On 6 July 2022 at 11:59am, Frolov sent an email to Videkanic (copying Maikousis) that showed the asset allocations for each Shield investment product, indicating exposure to risky asset classes including mortgage debt and convertible notes [Q2T.0045.0001.0249; Q2T.0045.0001.0252].
- vi. On 7 July 2023, Frolov told MWL that “as per our new TMD in the updated PDS you can only put upto [sic] 75% in any one product”: Email from Frolov to Videkanic (copying Chiodo) dated 7 July 2023 at 11:15am, forwarded to Maikousis at 11:21am [Q2T.0040.0001.4424].
- vii. On 11 July 2023, Videkanic instructed the MWL financial planning team that they could “use 75% of the allocation to the Shield High Growth Fund and 23% allocated to Shield Growth with the remainder in cash” and that this “ensures that NEP and CF are looked after initially”: Email from Videkanic to “fp team” (copying Maikousis) dated 11 July 2023 [Q2T.0038.0001.1515].
- viii. The matters referred to in the particulars under paragraph 38 above.

Further particulars may be provided after the filing of evidence.

(b) therefore, that:

- (i) Shield was a new fund with no proven performance track record;
- (ii) Shield had been the subject of review by only one research house, SQM, during the Relevant Period;
- (iii) each Shield investment product had:
 - (A) received a rating of “3.75 stars” in the October 2021 SQM Report and the October 2022 SQM Report; and
 - (B) been downgraded to a rating of “3.50 stars” in the January 2024 SQM Report, described as “Low Investment Grade”;
- (iv) Shield had potential governance weaknesses, including related party relationships and individuals common to both the responsible entity and the investment manager;
- (v) Shield invested (as to at least 20 per cent) in the ADPF, which was managed by CF Capital and involved investment in property developments managed by Chiodo Corporation;
- (vi) to the extent that Shield was exposed to the ADPF, Shield represented a potentially illiquid and undiversified investment given the original small

amount of funds under management (\$91 million) and the nature of the underlying assets; and

- (vii) according to the PDS for each Shield investment product:
 - (A) each product was rated as between “medium” to “high” risk (depending on the class);
 - (B) Shield was not intended as a complete investment program; and
 - (C) it was unlikely to be appropriate for an investor to invest the whole or a majority of their funds in Shield, and they would more likely be better placed as a “minor”, “satellite” or “core” investment

(together, the **Shield Investment Risks**).

E. THE LOW COST ADVICE PROJECT

E1. Development of the Low Cost Advice Project

43. Between March 2021 and May 2022, Maikousis (on behalf of MWL), and Chiodo and Frolov (on behalf of Keystone and CF Capital), discussed the establishment and implementation of arrangements under which clients would be referred to MWL and receive personal financial product advice recommending that they invest their superannuation in Shield, which arrangements later came to be referred to as the **Low Cost Advice Project**, described in more detail at paragraphs 54 to 59 below.

Particulars

- i. In or around May to June 2021:
 - a. Kortesis introduced Maikousis to Frolov and Chiodo; and
 - b. Maikousis met with Frolov and Chiodo to discuss a product that Frolov and Chiodo were developing (Shield).
- ii. On 22 July 2021, Maikousis shared a draft memorandum of understanding between Empire/ICGA and MWL with Chiodo and Frolov [Q2T.0038.0001.4354; Q2T.0038.0001.4355]. Chiodo responded to Maikousis on 23 July 2021, attaching a copy of the memorandum of understanding with his changes in markup [Q2T.0061.0001.2706; Q2T.0061.0001.2707]. On 26 July 2021, Maikousis sent Gilmore (copying Chiodo) an executed copy of the memorandum of understanding in which That Dam Marketing Company Pty Ltd (**DAM**) replaced Empire/ICGA as counterparty [Q2T.0040.0001.7350; Q2T.0040.0001.7351].

- iii. On 15 September 2021, Chiodo asked Maikousis to have his planners place at least \$5 million into Shield, to assist with the SQM research and getting Shield onto platforms [Q2T.0061.0001.2619].
- iv. On 3 December 2021, Chiodo, Frolov and Maikousis arranged a meeting for 6 December 2021 to discuss rolling MWL clients over into self-managed super funds (**SMSFs**) [Q2T.0040.0001.7444].
- v. Between 10 December 2021 and 14 January 2022, Chiodo, Frolov and Maikousis exchanged emails discussing the amount of funds MWL representatives were rolling over into Shield via SMSFs [Q2T.0040.0001.7440].
- vi. In an email dated 7 March 2022 from Videkanic to Chiodo and Frolov (copying Maikousis), MWL provided an update on client rollovers to Shield, confirmed that ICGA would start calling clients this week to be referred to MWL for statements of advice (**SOAs**), and stated that all future clients would be directed to Shield [Q2T.0040.0001.6940].
- vii. In emails between 10 and 28 March 2022 between Videkanic, Chiodo, Frolov and Maikousis, MWL (among other things) discussed MWL's targets for funds under management, reported the amount of funds that had been rolled into Shield, and confirmed timelines for each step of the Low Cost Advice Project [Q2T.0040.0001.5570; Q2T.0040.0001.1694; Q2T.0040.0001.4431].

Further particulars may be provided after the filing of evidence.

- 44. In or around June 2021, Chiodo and Frolov introduced Maikousis to Gilmore (of ICGA).
- 45. In the period from no later than June 2021, Chiodo and Frolov, representatives of ICGA, and Maikousis discussed arrangements by which ICGA would refer prospective clients to MWL for investment into Shield.

Particulars

- i. The matters referred to in particular (ii) under paragraph 43 above are repeated.
- ii. Between about June and August 2021, Willis, Gilmore and Walker engaged in email correspondence with MWL about adding Shield to MWL's approved product list (**APL**) and developing template SOAs. See, for example:
 - a. Email from Gilmore to Maikousis dated 24 June 2021 at 4:52pm titled "Dummy SOA" [Q2T.0038.0001.0388_R at .0438];
 - b. Email from Willis to Maikousis (copying Gilmore and Walker) dated 13 July 2021 at 3:44pm [Q2T.0038.0001.0202_R at .0385], requesting an update on "due diligence on Shield";

- c. Email from Willis to Maikousis dated 10 August 2021 at 3:34pm [Q2T.0038.0001.0388_R at .0455], asking whether “shield [is] on the APL yet”;
- d. Email from Maikousis to Willis dated 20 August 2021 at 9:44am [Q2T.0038.0001.0388_R at .0466], attaching an example SOA.

Further particulars may be provided after the filing of evidence.

46. Between July 2021 and May 2022, MWL and ICGA (or related entities) negotiated and entered into referral arrangements (the **ICGA Referral Arrangements**) for the purposes of the Low Cost Advice Project pursuant to which:

- (a) ICGA would refer prospective clients to MWL for investment into a pre-selected investment option, Shield; and
- (b) MWL would pay ICGA an ongoing fee of 20 per cent (plus GST) of MWL’s funds under management for any client referred by ICGA to MWL who invested in Shield.

Particulars

- i. Email from Willis to Maikousis (copying Walker and Gilmore) dated 13 July 2021 at 3:44pm [Q2T.0038.0001.0202_R at .0385].
- ii. On about 26 July 2021:
 - a. MWL and DAM entered into a “Mutual Non-Disclosure Agreement” recording that the parties wished to enter into a business relationship concerning “Raising Capital for the Shield Masterfund” [Q2T.0040.0001.7347].
 - b. MWL and DAM entered into a “Memorandum of Understanding” providing that DAM would source and refer “significant volume & level of new clients to MWL” in return for the provision of marketing and cost recovery fees to Empire and ICGA [Q2T.0040.0001.7351].
- iii. The terms of the ICGA Referral Arrangements were set out in:
 - a. the Memorandum of Understanding dated 26 July 2021;
 - b. a written referral agreement between ICGA and MWL dated 6 May 2022 [Q2T.0014.0001.0057]; and
 - c. unwritten or informal arrangements or communications between ICGA and MWL, which included the expectation that MWL Representatives would recommend referred clients to invest in Shield. See, for example, emails between ICGA and MWL between 10 and 13 September 2021 [Q2T.0038.0001.0202_R at .0231-.0234], discussing that MWL Representatives needed to be aware that some prospective clients would not yet have been “sold on Shield”.

- iv. Gilmore and Willis negotiated the ICGA Referral Arrangements on behalf of ICGA.
- v. Maikousis negotiated or authorised the ICGA Referral Arrangements on behalf of MWL.

Further particulars may be provided after the filing of evidence.

- 47. ICGA also received payments of referral fees from MWL for clients whom ICGA had referred to MWL Representatives, and who purchased insurance through their superannuation.
- 48. Between around May and October 2023, MWL replaced ICGA with NEP, on similar terms and arrangements to those referred to in paragraphs 46 to 47 above, as the referrer for the purpose of continuing the Low Cost Advice Project.

Particulars

Agreement between MWL and NEP titled "Referral Agreement" dated 15 May 2023
(the **MWL-NEP Referral Agreement**) [Q2T.0014.0001.0099].

E2. Arrangements between ICGA, Empire or NEP and entities associated with Shield

- 49. Between July and October 2021:
 - (a) ICGA entered into a referral arrangement with CF Capital; and
 - (b) Empire entered into a referral arrangement with Chiodo Corporation;
 (the **Empire Fee Arrangements**), pursuant to which:
 - (c) ICGA was to refer prospective investors to CF Capital, and CF Capital was to pay a monthly fee of \$130,000 (including GST) to ICGA for referred investors who subsequently invested in Shield; and
 - (d) Empire was to receive referral fees from Chiodo Corporation, calculated as 9 per cent of the funds invested by referred investors whom ICGA had referred to financial advice firms including MWL and who subsequently invested in Shield.

Particulars

- i. The terms of the Empire Fee Arrangements were set out in:
 - a. as between Empire and Chiodo Corporation, a written agreement between Chiodo Corporation and Empire titled "Project Marketing Agreement" dated 6 July 2021 [KSS.0013.0005.0026];

- b. as between ICGA and CF Capital, a written agreement between CF Capital and ICGA titled “Referrers Agreement” dated 7 October 2021 [R46.0010.0001.0252]; and
 - c. unwritten or informal arrangements or communications between Chiodo Corporation and/or CF Capital and ICGA and/or Empire. See, for example, emails between Gilmore, Walker and Willis and Chiodo and Frolov between 15 and 17 November 2022 [KSS.0210.0007.7535] discussing a proposed structure for fees and “volume bonuses”.
- ii. Gilmore, Walker and Willis negotiated the Empire Fee Arrangements on behalf of ICGA and Empire.
 - iii. Each of the Shield investment products included investments in property developments managed by Chiodo Corporation, at least through exposure to the ADPF.

Further particulars may be provided after the filing of evidence.

- 50. During the Relevant Period up to April 2023, ICGA paid Information Officers a commission in respect of prospective clients whom the Information Officers had referred to MWL and who invested in Shield, calculated as a percentage of the amount of funds invested.
- 51. At all times during the Relevant Period, MWL was aware, through Maikousis, that there were commercial arrangements between ICGA and entities associated with Shield under which ICGA would receive a financial benefit where ICGA referred a prospective client to a financial adviser and the client invested funds into Shield.

Particulars

The knowledge is to be inferred from matters including:

- i. In or around June to July 2021, during MWL’s negotiations to enter into a referral arrangement with ICGA, Maikousis sought to have Shield added to a superannuation platform (Netwealth): Email from Maikousis to Frolov (copying Chiodo) dated 3 June 2021 at 11:15am [Q2T.0038.0001.4449], referring to the process of having Shield added to Netwealth; Email from MWL to Netwealth (copying Maikousis) dated 6 July 2021 at 4:09pm [Q2T.0040.0001.7859 at .7869], stating that MWL expected to “have inflows into these funds for the next 12 months of approximately \$100M”; Email from Maikousis to Willis dated 28 July 2021 at 5:52pm [Q2T.0038.0001.0202_R at .0340-.0341], informing Willis of the request to Netwealth.
- ii. By no later than December 2021, Maikousis knew that Chiodo Corporation was making payments to Empire: Email from Chiodo to Maikousis dated 28 December 2021 at 12:04pm [Q2T.0040.0001.7440 at .7441].

- iii. Letter from SLF Lawyers (on behalf of MWL) to ASIC dated 10 December 2024[Q2T.0049.0001.0003 at .0009].

Further particulars may be provided after the filing of evidence.

52. On or about 1 June 2023, NEP entered into an agreement with Chiodo Corporation by which:
 - (a) NEP agreed to provide certain services including identifying potential clients or referrers of business and encouraging them to consider directing their business to Chiodo Corporation or its related entities; and
 - (b) Chiodo Corporation agreed to pay NEP a commission calculated as a specified percentage of funds invested by converted superannuation leads referred to an “approved Financial Advice firm” by NEP.

Particulars

Heads of Agreement between NEP and Chiodo Corporation dated 1 June 2023 [KSS.0013.0005.1158].

53. During the Relevant Period from around May 2023, MWL was aware (through Maikousis) that NEP had commercial arrangements with entities associated with Shield.

E3. The Operation of the Low Cost Advice Project

54. From about August 2021, and at all times during the Relevant Period, MWL included Shield on its APL.
55. At all material times, as part of the Low Cost Advice Project, Information Officers:
 - (a) contacted and screened prospective financial product advice clients, who had been identified through web-based lead generation measures;

Particulars

- i. ICGA sourced most of its leads from That Mad Marketing Company Pty Ltd (ACN 614 107 354) (**TMMC**). TMMC purchased leads from data sellers who generated the leads through web-based measures, including online surveys. Gilmore was the sole director of TMMC from 16 September 2020 to 19 October 2022.
- ii. Information Officers screened prospective clients on a telephone and/or video call to determine whether they met ICGA’s client qualification requirements.

- (b) held a video call presentation with prospective clients who were interested in receiving financial advice about their superannuation (**ICGA Presentations**); and
 - (c) referred prospective clients to an MWL Representative by way of a “warm handover” (if the representative was available) or else made an appointment for the client with an MWL Representative.
56. For prospective clients referred to the MWL Representatives (including from ICGA) as part of the Low Cost Advice Project, the Low Cost Advice Project had the following components:
- (a) the MWL Representative provided a recommendation, including in an SOA, for the client to invest their superannuation funds into one or more of four pre-selected “model investment portfolios”;
 - (b) the four model investment portfolios were the four investment classes of Shield: High Growth, Growth, Balanced and Conservative;

Particulars

MWL used template SOAs, which included pre-populated text to accompany a recommendation to invest in one or more of the model investment portfolios, as part of the Low Cost Advice Project.

- (c) where an MWL Representative provided an SOA, MWL received an upfront fee in respect of the SOA (the **Upfront SOA Fee**) of:
 - (i) \$1,100 (excluding GST) in the period up to early 2023; or
 - (ii) \$1,900 (excluding GST) from early 2023 onwards; and
 - (d) if the prospective client was not recommended to invest in one or more of the four Shield model investment portfolios, then MWL generally did not give the client an SOA as part of the Low Cost Advice Project or at all.
57. If a client implemented the recommendation to invest their superannuation funds into one or more of the Shield model investment portfolios, MWL was entitled to receive an ongoing fee of 1.1 per cent per annum of funds under management (the **Ongoing Fee**), paid by the relevant superannuation platform out of the client’s funds.
58. By reason of the matters in paragraphs 9, 10(c), 14, 56(c) and 57 above, the more clients who were referred to MWL Representatives, and the more clients who invested in one or

more of the Shield model investment portfolios, the greater the financial reward for the MWL Representative to whom the client was referred and for MWL.

59. By reason of the ICGA Referral Arrangements and the Empire Fee Arrangements, the more clients ICGA referred to MWL who invested in one or more of the Shield model investment portfolios, the greater the financial reward for ICGA and for Empire.

E4. Implementation of the Low Cost Advice Project

60. During the Relevant Period:

- (a) the MWL Representatives gave financial product advice to 566 clients in total (including those who were not referred to the MWL Representatives as part of the Low Cost Advice Project);

Particulars

The clients are identified (in an anonymised manner) in column A of Annexure A to the Statement of Claim.

- (b) after receiving advice from the MWL Representatives:
- (i) 556 (98.2 per cent) of those clients (the **Shield Clients**) made an initial investment in Shield; and
 - (ii) almost all of the Shield Clients invested most or almost all of their superannuation funds into Shield.

Particulars

The value of the initial investment in Shield for each of the Shield Clients is identified in column L of Annexure A to the Statement of Claim. Among other things:

- i. 541 (97.3 per cent) of the Shield Clients invested at least 70 per cent of their rolled-over superannuation (identified in column K) into Shield; and
- ii. 475 (85.4 per cent) of the Shield Clients invested least 90 per cent of their rolled-over superannuation (identified in column K) into Shield.

61. The Shield Clients were, typically, referred to MWL:

- (a) by ICGA, until about April 2023; or
- (b) by NEP, from about April 2023.

62. For each of the Shield Clients, MWL received:

- (a) the Upfront SOA Fee; and
- (b) the Ongoing Fee from the relevant superannuation platform, of which:
 - (i) MWL retained 80 per cent; and
 - (ii) 20 per cent was paid to ICGA under the ICGA Referral Arrangements, or to NEP under the MWL-NEP Referral Agreement.

63. During the Relevant Period to May 2023, ICGA, through Walker, Willis and/or Gilmore:

- (a) was aware that Information Officers were referring prospective clients to MWL Representatives so that the prospective clients would have their superannuation invested into Shield;

Particulars

The knowledge is to be inferred from matters including the following:

- i. The ICGA Referral Arrangements and the matters referred to in paragraph 46 above and the particulars under it.
- ii. The Empire Fee Arrangements and the matters referred to in paragraph 49 above and the particulars under it.
- iii. In July and August 2021, Willis, Walker and Gilmore discussed with Maikousis, by email, the addition of Shield to MWL's APL and the drafting of template SOAs, including as follows:
 - a. Email from Gilmore to Maikousis dated 24 June 2021 at 4:52pm [Q2T.0038.0001.0388_R at .0438].
 - b. Email from Willis to Maikousis (copying Walker and Gilmore) dated 13 July 2021 at 3:44pm [Q2T.0038.0001.0202_R at .0385].
 - c. Email from Willis to Maikousis dated 10 August 2021 at 3:34pm [Q2T.0038.0001.0388_R at .0455].
 - d. Email from Maikousis to Willis dated 20 August 2021 at 9:44am [Q2T.0038.0001.0388_R at .0466].
- iv. Email from Videkanic to Willis dated 22 March 2022 at 5:41pm, attaching a flowchart showing the intended referral of clients from ICGA to MWL resulting in investment of funds in Shield [Q2T.0038.0001.0765; Q2T.0038.0001.0766].
- v. During the Relevant Period, Willis, Walker and Gilmore engaged in email correspondence with MWL relating to the performance of MWL

Representatives in providing SOAs and achieving client investments in Shield, including as follows:

- a. Email from CF (ICGA) to Videkanic and Maikousis (copying, among others, Willis, Walker and Gilmore) dated 31 March 2022 at 6:39pm [Q2T.0040.0001.0507].
 - b. Email from SHA (ICGA) to Maikousis (copying, among others, Willis, Walker and Gilmore) dated 17 May 2022 at 3:36pm [Q2T.0040.0001.0110].
 - c. Email from Maikousis to Willis and Gilmore dated 19 May 2022 at 6:22pm [Q2T.0038.0001.3651].
 - d. Email from Maikousis to Walker and Chiodo dated 27 September 2022 at 4:59pm [Q2T.0038.0001.3879; Q2T.0038.0001.3881].
 - e. Email from Maikousis to Walker and McKenna dated 29 September 2022 at 12:14pm [Q2T.0040.0001.0098].
 - f. Email from Maikousis to Walker and McKenna dated 7 October 2022 at 5:15pm [Q2T.0040.0001.7198; Q2T.0040.0001.7200].
 - vi. Email from Gilmore to Frolov (CF Capital) dated 19 October 2022 at 8:04am [KSS.0210.0006.6904], requesting increased fees for ICGA referrals leading to investment in Shield.
 - vii. Email Walker to Frolov (CF Capital) (copying Willis and Gilmore) dated 16 November 2022 [KSS.0210.0007.7535], requesting “[a] volume bonus of \$2 million to be issued for every 100 million raised and invested into the shield master trust”.
 - viii. The matters referred to in the particulars under sub-paragraphs (b), (c) and (d) below.
- (b) at various times, and on a regular basis, received reporting from MWL as to the names and investment amounts of clients whose funds MWL had caused to be invested into Shield;

Particulars

For example:

- i. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 13 April 2022 at 1:57pm [Q2T.0038.0001.1222].
- ii. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 14 April 2022 at 3:01pm [Q2T.0038.0001.3258].
- iii. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 5 May 2022 at 2:47pm [Q2T.0038.0001.3050].

- iv. Email from Videkanic to Frolov, Chiodo, Walker, Willis and Gilmore (among others) dated 25 May 2022 at 6:53pm [Q2T.0038.0001.2723].
- v. Email from Videkanic to Willis (among others, copying Gilmore) dated 21 October 2022 at 10:07am [Q2T.0038.0001.0869].

Further particulars may be provided after the filing of evidence.

- (c) at various times, applied pressure to MWL and to Maikousis to ensure that the prospective clients referred by ICGA invested their superannuation into Shield, including by threatening to restrict referrals to MWL representatives who were not converting enough prospective clients into clients who approved the investment of their funds into Shield;

Particulars

Examples include:

- i. Email from CF (ICGA) to Videkanic and Maikousis (copying Walker, Gilmore, Willis and McKenna) dated 31 March 2022 at 6:39pm [Q2T.0040.0001.0507], stating that a certain MWL Representative was to be “removed from all communication channels for new referrals”.
- ii. Email from SHA (ICGA) to Maikousis (copying, among others, Walker, Gilmore and Willis) dated 17 May 2022 at 3:36pm [Q2T.004.0001.0110], referring to “unacceptable” conversion rates and requirements for “massive improvement”.
- iii. Emails between ICGA (including Walker, Gilmore and Willis) and MWL dated 27 May 2022 at 3:44pm to 4:02pm [Q2T.0038.0001.0787], discussing the performance and “remov[al]” of certain MWL Representatives.
- iv. Email from SHA (ICGA) to Videkanic and Maikousis (copying Walker, Gilmore and Willis, and Frolov) dated 30 May 2022 at 12:09pm [Q2T.0038.0001.3503], stating that certain MWL Representatives “will not be taking new business for the foreseeable future while they focus on moving the High Growth clients as a matter of urgency”.

Further particulars may be provided after the filing of evidence.

- (d) was aware that the prospective clients ICGA referred to MWL were investing their superannuation into Shield; and

Particulars

ICGA had access to information, and exchanged emails with MWL about referred clients and the products in which they had invested, including in the form of

“tracker” spreadsheets and screenshots of client accounts or transactions which showed investments in Shield. For example:

- i. The matters referred to in the particulars under sub-paragraph (b) above.
- ii. Email from AT (ICGA) to various MWL Representatives and staff of ICGA dated 31 March 2022 [Q2T.0040.0001.8707], stating that the ICGA MWL Tracker 3.01 would not save and that a new link had been shared to ICGA MWL Tracker 3.02 to use moving forward.
- iii. Email from DJ (ICGA) to MWL advisers, Maikousis, and staff of ICGA dated 27 April 2022 at 4:28pm [Q2T.0040.0001.0109], stating that ICGA would be making some updates to the tracker and not to open the tracker while it was being updated.

Further particulars may be provided after the filing of evidence.

- (e) was aware that Chiodo Corporation was paying commissions to Empire in respect of clients ICGA referred to MWL.

Particulars

The knowledge is to be inferred from the matters referred to in paragraph 49 above and the particulars under it, and the matters referred to in paragraph 66 below.

Further particulars may be provided after the filing of evidence.

64. During the Relevant Period to May 2023, MWL (through Maikousis):

- (a) was aware that ICGA was referring prospective clients to the MWL Representatives so that the clients would have their superannuation invested into Shield;

Particulars

The knowledge is to be inferred from:

- i. the matters referred to in paragraphs 43 to 47, 51 and 63(b) above and the particulars under those paragraphs; and
- ii. the matters referred to in particulars (iii) and (v) under paragraph 63(a) above.

Further particulars may be provided after the filing of evidence.

- (b) was aware, at various times, that continued referrals from ICGA to the MWL Representatives of prospective clients were dependent on enough referred clients being invested into Shield;

Particulars

The knowledge is to be inferred from matters including:

- i. Email from Walker to Videkanic and Maikousis (and others) dated 10 February 2022 at 10:29pm [Q2T.0040.0001.0667], referring to MWL “get[ting] your platoon out of the files and into the fund”.
- ii. Email from Chiodo to Videkanic and Maikousis (and others) dated 28 March 2022 at 10:26am [Q2T.0040.0001.4431], stating that “one of the key measures if you are going to meet this KPI is the quantity and value of the SOA presentations”.
- iii. Email from Gilmore to Videkanic and Maikousis (and others) dated 15 December 2022 at 1:35pm [Q2T.0040.0001.0466], referring to the need to “discuss payment with [Frolov]” and questioning the amount invested in the previous week.
- iv. Email from Gilmore to Videkanic and Maikousis (and others) dated 20 December 2022 at 2:47pm [Q2T.0040.0001.0466], stating that the amount invested in the previous week was “not acceptable or sustainable” and “[w]e will be reviewing our agreement with MWL”.
- v. The matters referred to in the particulars under paragraph 63(c) above.

Further particulars may be provided after the filing of evidence.

- (c) at various times, and on a regular basis, reported to ICGA the names and investment amounts of clients whose funds MWL had caused to be invested into Shield; and

Particulars

- i. The matters referred to in paragraphs 63(b) and 63(d) above, including the particulars under them, are repeated.
- ii. MWL reported to ICGA in meetings with ICGA that Videkanic and/or Maikousis attended.

- (d) at various times, and on a regular basis, reported to Chiodo and Frolov the total amount of client funds that had been rolled over and the amount that had been invested into Shield.

Particulars

MWL reported to Chiodo and Frolov via emails that were sent by, or copied to, Maikousis. See, for example:

- i. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 13 April 2022 at 1:57pm [Q2T.0038.0001.1222].

- ii. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 14 April 2022 at 3:01pm [Q2T.0038.0001.3258].
 - iii. Email from Videkanic to Frolov, Chiodo, Walker and Willis (among others) dated 5 May 2022 at 2:47pm [Q2T.0038.0001.3050].
 - iv. Email from Videkanic to Frolov, Chiodo, Walker, Willis and Gilmore (among others) dated 25 May 2022 at 6:53pm [Q2T.0038.0001.2723].
 - v. Email from Videkanic to Frolov (copying Chiodo and Maikousis) dated 2 June 2022 at 3:31pm [Q2T.0038.0001.3105].
65. Pursuant to the ICGA Referral Arrangements, MWL paid ICGA referral fees in respect of Shield Clients who had been referred by ICGA, which were calculated by reference to the amount of funds that those clients invested in Shield.
66. Between 3 August 2021 and 10 May 2023, Empire received approximately \$12.8 million in payments from Chiodo Corporation pursuant to the Empire Fee Arrangements, which included fees paid in respect of clients whom ICGA had referred to MWL and who had invested in Shield.

Particulars

The fees paid to Empire included a percentage of the funds that MWL clients, whom ICGA had referred to MWL, invested in Shield. ASIC refers to, for example:

- i. an MWL SOA dated 20 February 2023, which recommended client C80 invest \$163,716 in Shield and client C362 invest \$392,290 in Shield;
- ii. an order confirmation dated 6 April 2023 for client C80 to place \$163,213.35 in the Shield High Growth class;
- iii. an order confirmation dated 12 April 2023 for client C362 to place \$392,290 in the Shield High Growth class;
- iv. an invoice from Empire to Chiodo Corporation dated 11 April 2023 for (among other amounts) \$17,953.47 for client C80, which was 11 per cent of the amount client C80 invested in Shield on MWL's recommendation;
- v. an invoice from Empire to Chiodo Corporation dated 18 April 2023 for (among other amounts) \$43,151.90 for client C362, which was 11 per cent of the amount client C362 invested in Shield on MWL's recommendation; and
- vi. a NAB bank account statement for Empire dated 1 April 2023 to 30 June 2023, which includes payments from Chiodo Corporation for the total amounts of the invoices described above at (iv) and (v).

67. During the Relevant Period from about May 2023, MWL (through Maikousis) was aware that NEP was referring prospective clients to the MWL Representatives so that the clients would have their superannuation invested into Shield.

Particulars

The knowledge is to be inferred from matters including:

- i. The matters referred to in paragraphs 48 and 53 above.
- ii. Email from Videkanic to “fp team” (copying Maikousis and others) dated 11 July 2023 at 5:05pm [Q2T.0038.0001.1515], stating among other things that “in order to maintain our relationship with National Equity Partners and CF, for the initial piece of the advice we need to ensure that we invest the clients funds using 2 Shield products”.

Further particulars may be provided after the filing of evidence.

E5. Inadequate arrangements for managing conflicts arising from the Low Cost Advice Project

68. At all material times from its inception, the Low Cost Advice Project gave rise to potential conflicts between the interests of MWL and MWL Representatives on the one hand, and the interests of MWL’s clients on the other hand.

Particulars

The potential conflicts arose from the matters referred to in paragraphs 46 to 48, 51, 55 to 59, 63(c), and 64 to 67 above, and in particular:

- i. in accordance with the ICGA Referral Arrangements, ICGA referred prospective clients to MWL and MWL paid ICGA a percentage of the Ongoing Fee where those clients were recommended to and did invest in one or more of the Shield model investment portfolios;
- ii. MWL and the MWL Representatives obtained a benefit from the referral of prospective clients to MWL, because the provision of financial product advice to those clients could generate fees for MWL and the MWL Representatives;
- iii. MWL obtained a benefit from the referral of prospective clients to MWL by building its “book” of clients and, therefore, its potential value as a financial advice firm; and
- iv. the benefits could reasonably be expected to influence MWL and the MWL Representatives to recommend clients referred by ICGA (or, from about May 2023, NEP) to invest their superannuation in one or more of the Shield model investment portfolios, in order to ensure that ICGA (or NEP) continued to refer prospective clients to MWL.

69. At no point, at any material times, did MWL have adequate arrangements for identifying and managing the conflicts of interest that could arise from the Low Cost Advice Project.

Particulars

For example:

- i. A compliance plan prepared for the MWL Financial Group was not presented to the Board for approval, nor were the steps described in the compliance plan implemented: [Q2T.0033.0001.0011].
- ii. There is no record of the MWL compliance committee having considered conflicts arising from the Low Cost Advice Project.

Further particulars may be provided after the filing of evidence.

70. The MWL Conflicts of Interest Register identified a perceived conflict (first assessed in 2021) that, in respect of any prospective clients referred to MWL by an external marketing firm hired by MWL, authorised representatives must recommend Shield funds only (the **MWL Identified Shield Conflict**), where the potential gain or influence arising from the conflict was increased revenue to MWL Financial Group, shareholders and advisers.
71. The MWL Identified Shield Conflict did not adequately identify the extent or nature of the potential conflicts of interest, having regard to:
- (a) the circumstance that Shield was not an appropriate recommendation for retail clients to invest a significant proportion of their superannuation, in light of the matters referred to in paragraph 41 above; and
 - (b) the matters referred to in paragraphs 58 and 59 above.
72. The MWL Conflicts of Interest Register indicated that MWL managed the MWL Identified Shield Conflict by:
- (a) disclosing the arrangements in SOAs;
 - (b) not expressly directing advisers to use Shield funds; and
 - (c) if recommending Shield funds, requiring advisers to show that the recommendation met the best interest duties
- (the **MWL Identified Controls**).

73. The MWL Identified Controls were not adequate to manage the MWL Identified Shield Conflict, or any of the potential conflicts arising from the Low Cost Advice Project, including because:

- (a) neither the MWL Identified Shield Conflict, nor any other potential conflict, was disclosed in the SOAs given to the Shield Clients;
- (b) by reason of the matters set out in paragraph 56 above, a component of the Low Cost Advice Project was that the MWL Representatives recommend one of the four Shield model investment portfolios if an investment was to be recommended;
- (c) by reason of the matters set out in paragraph 41 above, no reasonable and competent financial adviser could have recommended that any retail client invest a significant proportion of their superannuation in Shield; and
- (d) in any case, the only control adequate to manage the potential conflicts arising from the Low Cost Advice Project was to determine that the Low Cost Advice Project ought not be implemented.

F. ICGA'S MISLEADING STATEMENTS TO PROSPECTIVE MWL CLIENTS

F1. Statements by ICGA to prospective clients

74. At all material times, Information Officers were required to, and in fact followed, the current approved version of a call script when speaking with prospective MWL clients during the ICGA Presentations.

75. The call scripts used from time to time during the Relevant Period were:

- (a) prepared by ICGA;

Particulars

Willis (on behalf of ICGA) first prepared call scripts in about August to October 2021.

- (b) prepared for the purpose of implementing the Low Cost Advice Project;
- (c) provided by ICGA to CF Capital for review; and
- (d) reviewed and approved by Gilmore, Walker and/or Willis on behalf of ICGA.

76. At all material times until about October 2022, the call scripts (the **Shield Scripts**), and the ICGA Presentations by Information Officers at that time, included express statements:

- (a) referring to the purported benefits of investing in Shield;
- (b) inviting prospective clients to speak to MWL to find out if Shield would suit them personally; and
- (c) that prospective clients were to be introduced to a financial adviser from MWL for advice.

Particulars

The statements were made during the ICGA Presentations and were made in accordance with scripts styled "Version 20" dated 29 October 2021 [IMP.0014.0001.0401] and "Version 21" dated 9 May 2022 [IMP.0014.0001.0423].

77. In about October or November 2022, ICGA approved a call script (the **Value of Advice Script**) which:

- (a) unlike the Shield Scripts, did not contain statements referring to Shield; and
- (b) contained statements about the benefits of receiving financial advice from MWL.

78. From November 2022 until about 10 March 2023, Information Officers made statements to prospective clients during ICGA Presentations in accordance with the Value of Advice Script to the following effect:

- (a) "As part of the process, if there's interest to discuss the service further, I will refer you to MWL Financial Services who can provide personal advice specifically for your needs";
- (b) "When investing with a financial planner, they do a deep dive into you and your circumstances and ensure that the investment options you are in match your goals and risk tolerances";
- (c) "First they'll work with you to understand what you are looking to achieve in retirement";
- (d) "Secondly, they'll create a plan of how you will get there. They'll assess questions like: What levels of risk and return are required to reach your target? What portfolio of investments would give the greatest chances of success? Are there tax

strategies to help you optimise growth along the way? And more. They will then put this into a single document for you called a Statement of Advice, or SoA”;

- (e) “[MWL’s] role will be to appoint a dedicated financial planner who will look at both your risk profile and your financial situation to help you make the best decision moving forward”; and
- (f) “Financial advisors like MWL are legally obliged to act in the best interest of the client. What this means for you is they will only tell you to do what is best for you”

(together, the **MWL Advice Statements**).

Particulars

The MWL Advice Statements were made during the ICGA Presentations and were made in accordance with the Value of Advice Script [IMP.0014.0001.0622].

79. From at least November 2022 to about November 2023, ICGA stated to prospective clients, in documents described as “Terms of business” or “Our terms of business” (the **Terms of Business**), that “[w]e have or will refer to you MWL Financial Services Pty Limited ABN 22 095 907 574 AFSL 235096 (MWL) who, if you wish, can provide you with personal advice — advice which does take into account your investment objectives, financial situation and particular needs” (the **Terms of Business Statement**).

Particulars

The Terms of Business were identified as being in the name of ICGA, and were provided to prospective clients who were prompted to electronically sign an “acknowledgement” on the document. During the Relevant Period, at least the following versions were used:

- i. Version dated February 2022, which was jointly branded with the names and logos of ICGA, CF Capital and Keystone: for example, [Q2T.0019.0001.2154].
- ii. Version dated November 2022, which was jointly branded with the names and logos of ICGA and Keystone: for example, [IMP.0020.0001.2986].
- iii. Version dated 22 March 2023, which was branded with the name and logo of ICGA: for example, [IMP.0020.0001.3044].

F2. ICGA’s contraventions of s 12DB of the ASIC Act

80. By making the MWL Advice Statements and, further or alternatively, the Terms of Business Statement, ICGA represented to prospective clients that, on referral to MWL, MWL provided financial product advice and selected financial products to recommend

based on the individual circumstances of the prospective client (the **MWL Advice Representation**).

Particulars

The representation was express and was conveyed by the making of the MWL Statements; or alternatively, it was conveyed insofar as the MWL Statements were made. It was also conveyed by the making of the Terms of Business Statement.

81. The MWL Advice Representation was made:
 - (a) in trade or commerce; and
 - (b) in connection with the supply or possible supply of financial services.
82. The MWL Advice Representation was with respect to a future matter within the meaning of s 12BB(1) of the ASIC Act.
83. Further or alternatively:
 - (a) the MWL Advice Representation was a representation of opinion; and
 - (b) by making the MWL Advice Representation, ICGA represented that the opinion was genuinely held and based on reasonable grounds.
84. Contrary to the MWL Advice Representation, at all times when the MWL Advice Representation was made during the Relevant Period:
 - (a) on referral to MWL, MWL Representatives did not provide personal financial product advice or select financial products to recommend based on the individual circumstances of each client; and
 - (b) under the Low Cost Advice Project, the MWL Representative's recommendation, if made, was for clients to invest their superannuation funds into Shield as the pre-selected investment option.

Particulars

See paragraph 56 above.

85. By reason of the matters referred to in paragraph 84 above, the MWL Advice Representation was false or misleading.

86. Further or alternatively, insofar as the MWL Advice Representation was with respect to a future matter or a representation of opinion, ICGA did not have reasonable grounds for making the MWL Advice Representation.

Particulars

See paragraph 63 above.

87. By reason of the matters referred to paragraphs 80 to 86 above, ICGA contravened:
- (a) s 12DB(1)(a) of the ASIC Act by making false or misleading representations that services were of a particular standard or quality; and
 - (b) s 12DB(1)(e) of the ASIC Act by making false or misleading representations that services had certain benefits.

G. MWL'S CONTRAVENTIONS OF THE ACT

G1. Section 961L of the Act

88. The structure and operation of the Low Cost Advice Project was not compatible with the provision of financial product advice in accordance with the obligations in ss 961B(1) and 961G of the Act because:
- (a) it involved MWL Representatives recommending that clients invest in a pre-selected financial product without regard to the individual objectives, financial situation or needs of those clients; and/or
 - (b) MWL had formed a predetermined view that investment into Shield was in the best interests of clients of the Low Cost Advice Project, and the MWL Representatives generally did not provide an SOA to clients who did not wish to invest in Shield.
89. When considering Shield for inclusion on its APL and for use as an investment recommendation for the Low Cost Advice Project, MWL should have, but did not:
- (a) conduct appropriate research into, and analysis of, Shield;
 - (b) assess the Shield Investment Risks and determine that, if Shield were placed on its APL and MWL Representatives recommended that retail clients invest a significant proportion of their superannuation into Shield, there was a substantial risk that those MWL Representatives would not comply with their obligations to provide appropriate advice within the meaning of s 961G of the Act;

- (c) determine that the Shield investment products were not appropriate to have as the pre-selected investment products to recommend as part of the Low Cost Advice Project in circumstances where the Low Cost Advice Project was directed to the investment of most, almost all or all of retail clients' superannuation funds; and/or
 - (d) determine that:
 - (i) the Shield investment products were not appropriate investment products to be placed on MWL's APL; or
 - (ii) alternatively, if Shield was to be placed on MWL's APL, it should be subject to conditions such that retail clients would not receive recommendations to invest a significant proportion of their superannuation into Shield.
90. Further or alternatively, in circumstances where MWL had determined to place Shield on its APL, MWL should have, but did not:
- (a) take appropriate steps to ensure that MWL Representatives did not recommend that retail clients invest a significant proportion of their superannuation into Shield; and/or
 - (b) remove Shield from its APL in response to one or more of the circumstances identified in paragraphs 38 to 40 above.
91. By reason of the matters referred to in paragraphs 88 to 90 above, and paragraphs 92 to 95 below, MWL:
- (a) failed to take reasonable steps to ensure that the MWL Representatives complied with ss 961B and 961G of the Act; and
 - (b) therefore contravened s 961L of the Act.

G2. Section 961K(2) of the Act

92. During the Relevant Period:
- (a) in providing personal financial product advice (within the meaning of s 766B of the Act) pursuant to the Low Cost Advice Project, the MWL Representatives recommended to all prospective clients referred by ICGA or NEP for personal advice that they invest the whole or a significant proportion of their superannuation in a pre-selected financial product, being Shield;

- (b) in making those recommendations, the MWL Employee Representatives did not act in the best interests of their clients, including because they did not:
 - (i) identify the objectives, financial situation and needs of the client as disclosed to them through instructions, within the meaning of s 961B(2)(a) of the Act;
 - (ii) identify the subject matter of the advice that was sought by the client explicitly or implicitly, within the meaning of s 961B(2)(b)(i) of the Act;
 - (iii) identify the objectives, financial situation and needs of the client that would reasonably be considered as relevant to advice sought on that subject matter, within the meaning of s 961B(2)(b)(ii) of the Act;
 - (iv) conduct a reasonable investigation into the financial products that might achieve each client's individual objectives and meet the client's needs, within the meaning of s 961B(2)(e)(i) of the Act;
 - (v) assess the information gathered in the investigation, within the meaning of s 961B(2)(e)(ii) of the Act; and
 - (vi) base all judgements in advising the client on the client's objectives, financial situation or needs, within the meaning of s 961B(2)(f) of the Act.
93. By reason of the matters referred to in paragraph 92 above, the MWL Employee Representatives contravened s 961B(1) of the Act.
94. By reason of the Shield Investment Risks and the availability of alternative investment products on MWL's APL, in providing financial product advice (within the meaning of s 766B of the Act) for retail clients to invest a significant proportion of their superannuation into Shield, the MWL Employee Representatives provided advice to each relevant Shield Client in circumstances where it was not reasonable to conclude that the advice was appropriate to that client, if the MWL Employee Representatives had satisfied the duty under s 961B(1) of the Act to act in the best interests of the client.
95. By reason of the matters referred to in paragraph 94 above, the MWL Employee Representatives contravened s 961G of the Act.
96. By reason of the matters referred to in paragraphs 88, and 92 to 95 above, MWL contravened s 961K(2) of the Act in respect of contraventions of ss 961B and 961G of the Act by the MWL Employee Representatives.

G3. Section 912A(1)(a) of the Act

97. MWL failed to do all things necessary to ensure that it provided financial product advice about superannuation to retail clients efficiently, honestly and fairly by reason of each of the following circumstances:

- (a) by implementing the Low Cost Advice Project with the features and in the circumstances set out in paragraphs 43 to 66 above;
- (b) by using the four classes of Shield as the model portfolio investment recommendation as part of the Low Cost Advice Project in the circumstances set out in paragraphs 30 to 66 above;
- (c) by placing Shield on MWL's APL:
 - (i) at all; or
 - (ii) without appropriate conditions as set out in paragraph 89(d)(ii) above,
 given the Shield Investment Risks; and/or
- (d) in circumstances where Shield was placed on MWL's APL:
 - (i) by failing to take appropriate steps to ensure that MWL Representatives did not recommend that retail clients invest a significant proportion of their superannuation into Shield as set out in paragraph 90(a) above; and
 - (ii) by failing to remove Shield from its APL as set out in paragraph 90(b) above.

98. By reason of the matters set out in paragraph 97 above, MWL contravened s 912A(1)(a) and therefore s 912A(5A) of the Act.

G4. Section 912A(1)(aa) of the Act

99. MWL failed to have in place adequate arrangements for the management of conflicts of interest that might arise wholly, or partially, in relation to financial product advice provided by MWL Representatives as part of the Low Cost Advice Project, by reason of:

- (a) the circumstances referred to in paragraphs 24 to 29, 46 to 48, 51, 55 to 59, 63(c), 64, 65 and 67 above; and
- (b) the matters set out in paragraphs 68 to 73 above.

100. By reason of the matters set out in paragraph 99 above, MWL contravened s 912A(1)(aa) and therefore s 912A(5A) of the Act.

H. MAIKOUSIS'S CONTRAVENTIONS OF THE ACT

101. By reason of Maikousis's knowledge of the matters referred to in paragraphs 2, 7 to 14, 24 to 40, 42 to 48, 51, 53 to 62, 64, 65, and 67 to 73 above, Maikousis was (within the meaning of s 79 of the Act) knowingly concerned and therefore involved in:

- (a) MWL's contravention of s 961L of the Act;
- (b) MWL's contravention of s 912A(1)(a), and therefore s 912A(5A) of the Act; and
- (c) MWL's contravention of s 912A(1)(aa), and therefore s 912A(5A) of the Act,

and is therefore taken, by force of s 1317E(4) of the Act, to have contravened ss 961L and 912A(5A) of the Act.

Particulars

Maikousis's knowledge is to be inferred from the paragraphs referred to above, including the particulars under them; and from the matters referred to in paragraphs 4 and 5 above.

I. ICGA'S CONTRAVENTIONS OF THE ACT

102. At all material times during the Relevant Period until about May 2023, ICGA (through Gilmore, Willis and Walker):

- (a) knew that MWL held an AFSL pursuant to which it was authorised to provide personal financial product advice to retail clients, including with respect to superannuation products; and
- (b) knew of or participated in the matters referred to in paragraphs 3(b), 16 to 23, 26, 27(a), (c) and (d), 28, 29(a), 44 to 47, 49 to 50, 55 to 57, 59, 62 to 63, and 65 to 66 above.

Particulars

See the paragraphs referred to and the particulars under them.

103. By reason of the matters set out in paragraph 102 above, ICGA was (within the meaning of s 79 of the Act) knowingly concerned and therefore involved in MWL's contravention of

s 912A(1)(a) and therefore s 912A(5A) of the Act insofar as MWL contravened that provision by reason of the matters set out in paragraph 97(a) above.

104. ICGA is therefore taken to have contravened s 912A(5A) of the Act, pursuant to s 1317E(4) of the Act.

J. HARM

105. On 5 February 2024, ASIC issued interim stop orders to prevent new investment into Shield.
106. On 27 August 2024, on the application of ASIC in Federal Court proceeding VID536 of 2024, the Federal Court appointed receivers and managers to the property of Keystone in its capacity as the responsible entity of Shield.

Particulars

Australian Securities and Investments Commission v Keystone Asset Management Ltd [2024] FCA 1019.

107. On 28 August 2024, Keystone was placed into administration by its directors.
108. By 22 November 2024, the receivers and managers of Keystone estimated that Shield had suffered significant loss, and the returns to unitholders of Shield (varying between class) could be between 22 per cent and 58 per cent of their investment.

Particulars

Letter dated 22 November 2024 from Deloitte, as Receivers and Administrators of Keystone, to unitholders of Shield titled 'Significant Event Notice for the purposes of Section 2017B of the Corporations Act 2001 regarding the Appointment of voluntary Administrators and Receivers of Keystone Asset Management and related events'.

109. On 2 December 2024, Keystone was placed into liquidation by its creditors.
110. On 10 April 2025, the receivers and managers and liquidators of Keystone informed unitholders of Shield that they had determined it was in the best interests of the Shield unitholders to terminate Shield, on grounds including that:
- (a) the purpose, return objectives and investment and diversification exposures outlined in the PDS for each class of units in Shield could not be achieved; and
 - (b) Shield had likely suffered significant losses.

Particulars

Letter from Alvarez & Marsal to unitholders of Shield dated 10 April 2025, titled "Notice of termination of the Shield Master Fund".

111. By reason of the matters alleged in paragraphs 106 to 110 above, in the circumstances set out in the whole of the Statement of Claim, the Shield Clients have suffered financial loss.

Date: 5 October 2026



Signed by Georgina Thomas
Lawyer for the Plaintiff

This pleading was prepared by Joanne Shepard SC and Minh-Quan Nguyen of counsel.

Certificate of lawyer

I, Georgina Thomas, certify to the Court that, in relation to the statement of claim filed on behalf of the Applicant, the factual and legal material available to me at present provides a proper basis for each allegation in the pleading.

Date: 5 October 2026

A handwritten signature in blue ink, appearing to read 'G. Thomas', is positioned above a horizontal dotted line.

Signed by Georgina Thomas
Lawyer for the Plaintiff

SCHEDULE OF PARTIES

No. VID245 of 2026

Federal Court of Australia
District Registry: Victoria
Division: General

Second Defendant	IMPERIAL CAPITAL GROUP AUSTRALIA PTY LTD ACN 628 734 583
Third Defendant	NICHOLAS MAIKOUSIS

Annexure A: MWL clients in the Relevant Period

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
Client no	Client name	Client age	Adviser no	Adviser name	Date of SOA	Super balance before SOA	Name of previous or existing financial product	Did the client invest in Shield	Date of initial Shield investment	Initial rollover amount	Value of initial Shield investment	Shield classes invested in	% of rollover invested in Shield	Source
C1		53	A2		28/02/2022	\$ 305,458.00	Macquarie/Netwealth	YES	10/05/2022	\$ 309,935.01	\$ 300,432.72	Growth	96.9%	MWL; MIML
C2		53	A3		21/12/2022	\$ 500,454.00	HESTA Super	NO	N/A	N/A	N/A	N/A	N/A	MWL
C3		53	A3		30/03/2022	\$ 300,606.00	Australian Catholic Super, Partner Managed Accounts Superannuation	YES	11/05/2022	\$ 291,492.37	\$ 285,662.52	Growth	98%	MWL, MIML, Q2T.0036.0004.9195
C4		40	A3		04/04/2022	\$ 230,923.00	Australian Catholic Super Praemium Partner Managed Accounts Superannuation	YES	11/05/2022	\$ 223,103.87	\$ 220,872.83	Growth	99%	MWL, MIML, Q2T.0036.0004.6898
C5		49	A3		16/03/2022	\$ 171,824.00	CFS Wholesale Personal Super	YES	11/05/2022	\$ 162,856.53	\$ 159,599.40	Growth	98%	MWL, MIML, Q2T.0036.0004.9249
C6		49	A3		12/10/2021	\$ 556,262.00	Plum Super	YES	11/05/2022	\$ 540,559.13	\$ 535,153.54	Growth	99.0%	MWL, MIML
C7		46	A1		31/03/2022	\$ 224,830.00	Macquarie super manager II	YES	11/05/2022	\$ 241,730.30	\$ 228,000.00	Growth	94.3%	MWL, MIML
C8		59	A1		02/05/2022	\$ 215,530.00	Macquarie super manager II	YES	11/05/2022	\$ 213,413.00	\$ 209,000.00	High Growth	97.9%	MWL, MIML
C9		57	A3		22/03/2022	\$ 169,925.00	LUCRF Super	YES	19/05/2022	\$ 152,570.97	\$ 151,045.26	Growth	99.0%	MWL; MIML; Q2T.0036.0005.1909
C10		64	A1		21/11/2021	\$ 83,212.00	Macquarie super manager II	YES	19/05/2022	\$ 80,000.00	\$ 75,000.00	Balanced	93.8%	MWL, MIML
C11		61	A1		21/11/2021	\$ 264,559.00	Macquarie super manager II	YES	19/05/2022	\$ 266,170.91	\$ 260,000.00	Balanced	97.7%	MWL, MIML
C12		50	A4		08/03/2022	\$ 142,100.00	IOOF, CFS	YES	19/05/2022	\$ 113,268.24	\$ 109,000.00	Balanced	96.2%	MWL, MIML
C13		54	A3		08/03/2022	\$ 215,729.00	Australian Super	YES	19/05/2022	\$ 205,729.00	\$ 203,672.00	Growth	99.0%	MWL, MIML
C14		50	A5		15/03/2022	\$ 192,737.00	MLC MasterKey Super Fundamentals	YES	19/05/2022	\$ 182,737.00	\$ 178,713.00	High Growth	97.8%	MWL, MIML
C15		61	A2		24/03/2022	\$ 200,820.00	Macquarie/CBUS	YES	19/05/2022	\$ 195,159.31	\$ 194,159.31	High Growth	99.5%	MWL, MIML
C16		54	A2		29/03/2022	\$ 367,000.00	Macquarie/Suncorp	YES	19/05/2022	\$ 337,000.00	\$ 335,000.00	High Growth	99.4%	MWL, MIML
C17		57	A2		30/03/2022	\$ 381,377.00	Macquarie/Aus Super	YES	19/05/2022	\$ 360,000.00	\$ 359,000.00	High Growth	99.7%	MWL, MIML
C18		45	A1		11/04/2022	\$ 182,032.00	Macquarie super manager II	YES	19/05/2022	\$ 170,000.00	\$ 165,000.00	Growth	97.1%	MWL, MIML
C19		61	A2		25/04/2022	\$ 601,647.00	Macquarie/AMP	YES	19/05/2022	\$ 568,209.98	\$ 565,000.00	Growth	99.4%	MWL, MIML
C20		39	A3		09/03/2022	\$ 144,873.00	IOOF Personal Super, Praemium Partner Managed Accounts Superannuation	YES	26/05/2022	\$ 140,129.64	\$ 137,327.04	Growth	98%	MWL, MIML, Q2T.0036.0004.9195
C21		47	A5		11/03/2022	\$ 435,253.00	Australian Retirement Trust for life	YES	26/05/2022	\$ 422,541.53	\$ 418,316.11	High Growth	99.0%	MWL, MIML
C22		56	A5		23/03/2022	\$ 361,780.00	Aware Super	YES	26/05/2022	\$ 351,780.00	\$ 344,745.00	High Growth	98.0%	MWL, MIML

C23		54	A5		24/03/2022	\$ 471,432.00	Russell IQ Super - For Life	YES	26/05/2022	\$ 461,432.00	\$ 452,203.00	High Growth	98.0%	MWL, MIML
C24		52	A5		07/04/2022	\$ 423,476.00	QSuper	YES	26/05/2022	\$ 398,861.88	\$ 390,884.64	High Growth	98.0%	MWL, MIML
C25		59	A5		11/04/2022	\$ 234,202.00	MLC MasterKey Super Fundamentals	YES	26/05/2022	\$ 230,029.72	\$ 225,429.13	High Growth	98.0%	MWL, MIML
C26		45	A5		21/04/2022	\$ 72,083.00	REST Super, SMSF	YES	26/05/2022	\$ 8,751.82	\$ 6,189.82	High Growth	70.7%	MWL, MIML
C27		62	A5		29/04/2022	\$ 266,539.00	MyNorth Super	YES	26/05/2022	\$ 250,965.47	\$ 245,946.16	High Growth	98.0%	MWL, MIML
C28		56	A3		29/04/2022	\$ 228,240.00	TWUSUPER Industry	YES	26/05/2022	\$ 218,240.00	\$ 216,000.00	Growth	99.0%	MWL, MIML
C29		55	A5		10/05/2022	\$ 145,897.00	Colonial First State FirstChoice Wholesale Personal Super, REST Super	YES	26/05/2022	\$ 104,184.59	\$ 98,686.81	High Growth	94.7%	MWL, MIML
C30		57	A2		17/03/2022	\$ 210,830.00	Amp Signature Super, Praemium	YES	02/06/2022	\$ 197,677.90	\$ 195,677.00	High Growth	99%	MWL, MIML, Q2T.0036.0004.4236
C31		48	A5		24/03/2022	\$ 140,052.00	AustralianSuper	YES	02/06/2022	\$ 128,052.00	\$ 124,391.00	High Growth	97.1%	MWL, MIML
C32		48	A2		08/04/2022	\$ 158,610.00	Macquarie/Mercer Super	YES	02/06/2022	\$ 152,931.99	\$ 150,931.00	Growth	98.7%	MWL, MIML
C33		53	A5		13/04/2022	\$ 474,766.00	MyNorth Super	YES	02/06/2022	\$ 457,964.72	\$ 448,805.43	High Growth	98.0%	MWL, MIML
C34		43	A5		20/04/2022	\$ 412,660.00	Australian Super, SMSF - Cash	YES	02/06/2022	\$ 302,028.95	\$ 297,498.52	High Growth	98.5%	MWL, MIML
C35		46	A5		20/04/2022	\$ 177,150.00	MLC MasterKey Super Fundamentals	YES	02/06/2022	\$ 167,150.00	\$ 163,807.00	High Growth	98.0%	MWL, MIML
C36		59	A3		10/05/2022	\$ 690,942.00	Vision Super	YES	02/06/2022	\$ 690,826.42	\$ 683,918.15	High Growth	99.0%	MWL, MIML
C37		52	A3		13/05/2022	\$ 209,949.00	BT Super	YES	02/06/2022	\$ 199,949.00	\$ 198,000.00	Growth	99.0%	MWL, MIML
C38		42	A2		18/03/2022	\$ 316,666.00	Praemium/Mine Super	YES	09/06/2022	\$ 297,579.10	\$ 295,579.00	High Growth	99%	MWL, MIML, Q2T.0036.0
C39		49	A2		02/05/2022	\$ 122,140.00	Praemium	YES	09/06/2022	\$ 118,583.16	\$ 117,580.00	Growth	99%	MWL, MIML, Q2T.0036.0
C40		41	A4		16/03/2022	\$ 159,666.00	AMP Signature Super	YES	09/06/2022	\$ 159,666.81	\$ 156,000.00	Growth	97.7%	MWL, MIML
C41		52	A5		06/04/2022	\$ 310,783.00	BT Super for Life	YES	09/06/2022	\$ 293,337.78	\$ 287,471.02	High Growth	98.0%	MWL, MIML
C42		47	A4		06/04/2022	\$ 69,077.00	Suncorp Super	YES	09/06/2022	\$ 69,077.56	\$ 66,000.00	Balanced	95.5%	MWL, MIML
C43		53	A4		06/04/2022	\$ 190,226.00	Aware, MLC Personal Super, Signature Super	YES	09/06/2022	\$ 180,226.39	\$ 176,000.00	Balanced	97.7%	MWL, MIML
C44		54	A8		21/04/2022	\$ 147,423.00	Commonwealth Bank Group Super	YES	09/06/2022	\$ 145,279.38	\$ 139,468.20	Growth	96.0%	MWL, MIML
C45		52	A3		22/04/2022	\$ 340,386.00	Australian Super	YES	09/06/2022	\$ 300,000.00	\$ 297,000.00	Growth	99.0%	MWL, MIML
C46		59	A1		18/05/2022	\$ 290,295.00	Macquarie super manager II	YES	09/06/2022	\$ 290,000.00	\$ 282,000.00	Growth	97.2%	MWL, MIML
C47		58	A5		23/05/2022	\$ 198,553.00	BUSSQ MySuper	YES	09/06/2022	\$ 188,553.00	\$ 182,839.27	High Growth	97.0%	MWL, MIML
C48		39	A4		29/03/2022	\$ 279,000.00	EISS Super	YES	16/06/2022	\$ 269,000.00	\$ 265,500.00	Growth	98.7%	MWL, MIML
C49		56	A4		13/04/2022	\$ 151,000.00	Australian Super	YES	16/06/2022	\$ 141,000.00	\$ 137,500.00	Growth	97.5%	MWL, MIML

C50		46	A1		20/11/2021	\$ 83,233.00	Macquarie super manager II	YES	23/06/2022	\$ 80,320.57	\$ 75,000.00	Balanced	93.4%	MWL, MIML
C51		46	A2		02/02/2022	\$ 286,913.00	Macquarie/Rest	YES	23/06/2022	\$ 281,841.50	\$ 279,000.00	High Growth	99.0%	MWL, MIML
C52		53 & 47	A2		03/03/2022	\$ 597,361.00	Macquarie/Active Super	YES	23/06/2022	\$ 558,095.05	\$ 552,000.00	Growth	98.9%	MWL, MIML
C53		47	A5		21/03/2022	\$ 275,229.00	OnePath OneAnswer Personal Super	YES	23/06/2022	\$ 251,700.02	\$ 246,666.02	High Growth	98.0%	MWL, MIML
C54		46	A1		23/03/2022	\$ 141,751.00	Macquarie super manager II	YES	23/06/2022	\$ 142,031.73	\$ 136,000.00	Growth	95.8%	MWL, MIML
C55		48	A5		01/04/2022	\$ 207,452.85	AMP Signature Super - Personal Super	YES	23/06/2022	\$ 194,537.93	\$ 189,569.17	High Growth	97.4%	MWL, MIML
C56		49	A5		05/04/2022	\$ 236,960.00	netwealth Super Accelerator, Australian Super	YES	23/06/2022	\$ 137,780.19	\$ 134,485.59	High Growth	97.6%	MWL, MIML
C57		34	A8		19/04/2022	\$ 396,326.00	Mine Super	YES	23/06/2022	\$ 379,175.48	\$ 371,591.97	High Growth	98.0%	MWL, MIML
C58		59	A5		19/04/2022	\$ 507,434.00	BT Super for Life	YES	23/06/2022	\$ 465,000.00	\$ 456,941.50	High Growth	98.3%	MWL, MIML
C59		44	A1		28/04/2022	\$ 206,307.00	Macquarie super manager II	YES	23/06/2022	\$ 197,973.51	\$ 190,973.00	Growth	96.5%	MWL, MIML
C60		46	A1		10/05/2022	\$ 248,444.00	Macquarie super manager II	YES	23/06/2022	\$ 247,779.00	\$ 240,000.00	Growth	96.9%	MWL, MIML
C61		46	A1		10/05/2022	\$ 122,289.00	Macquarie super manager II	YES	23/06/2022	\$ 122,289.00	\$ 115,000.00	Growth	94.0%	MWL, MIML
C62		55	A1		11/05/2022	\$ 315,802.00	Macquarie super manager II	YES	23/06/2022	\$ 315,000.00	\$ 308,000.00	Growth	97.8%	MWL, MIML
C63		54	A5		12/05/2022	\$ 240,673.00	Australian Super, Equip Super, Mynorth Super	YES	23/06/2022	\$ 159,552.40	\$ 155,383.41	High Growth	97.4%	MWL, MIML
C64		43	A3		25/05/2022	\$ 149,520.00	Aware Super & Hesta Super	YES	23/06/2022	\$ 129,521.00	\$ 127,577.00	Growth	98.5%	MWL, MIML
C65		37	A3		25/05/2022	\$ 187,934.00	EISS Super	YES	23/06/2022	\$ 177,934.00	\$ 175,265.00	Growth	98.5%	MWL, MIML
C66		59	A1		09/06/2022	\$ 276,643.00	Macquarie super manager II	YES	23/06/2022	\$ 278,426.37	\$ 270,000.00	Balanced	97.0%	MWL, MIML
C67		49	A2		25/01/2022	\$ 242,635.00	Macquarie/Media Super	YES	01/07/2022	\$ 230,708.32	\$ 226,000.00	Growth	98.0%	MWL, MIML
C68		55	A1		17/03/2022	\$ 343,308.00	Macquarie super manager II	YES	01/07/2022	\$ 332,729.96	\$ 325,067.00	Growth	97.7%	MWL, MIML
C69		47	A8		12/05/2022	\$ 232,508.00	AustralianSuper and Hesta	YES	01/07/2022	\$ 25,405.32	\$ 22,000.00	Balanced	86.6%	MWL, MIML
C70		49	A2		09/06/2022	\$ 389,857.00	Macquarie/Telstra Super/Smart Monday	YES	01/07/2022	\$ 363,828.03	\$ 359,000.00	Growth	98.7%	MWL, MIML
C71		54	A2		14/06/2022	\$ 557,805.00	Macquarie/CBA Super	YES	01/07/2022	\$ 522,000.00	\$ 517,000.00	High Growth	99.0%	MWL, MIML
C72		50	A8		25/03/2022	\$ 231,827.00	AMP Sig Super & Care Super	YES	07/07/2022	\$ 219,385.95	\$ 214,266.22	Growth	97.7%	MWL, MIML
C73		41	A3		25/04/2022	\$ 116,541.00	ART Super	YES	07/07/2022	\$ 106,541.00	\$ 104,410.00	Growth	98.0%	MWL, MIML
C74		57	A5		04/05/2022	\$ 177,650.00	BT Super for Life	YES	07/07/2022	\$ 165,574.62	\$ 161,163.13	High Growth	97.3%	MWL, MIML

C75		46	A2		05/05/2022	\$ 355,454.00	Macquarie/BT Panorama	YES	07/07/2022	\$ 338,458.24	\$ 336,000.00	High Growth	99.3%	MWL, MIML
C76		50	A3		12/05/2022	\$ 186,773.00	CBUS	YES	07/07/2022	\$ 170,000.00	\$ 164,987.00	Growth	97.1%	MWL, MIML
C77		56	A3		27/05/2022	\$ 271,300.00	AMP Flexible Lifetime Super	YES	07/07/2022	\$ 261,991.55	\$ 249,372.63	Growth	95.2%	MWL, MIML
C78		56	A1		31/05/2022	\$ 247,196.00	Macquarie super manager II	YES	07/07/2022	\$ 218,069.63	\$ 211,000.00	Growth	96.8%	MWL, MIML
C79		52	A4		12/04/2022	\$ 137,280.00	CFS First Choice	YES	14/07/2022	\$ 137,280.41	\$ 133,000.00	Growth	96.9%	MWL, MIML
C80		41	A4		12/04/2022	\$ 88,978.00	CFS First Choice	YES	14/07/2022	\$ 88,978.25	\$ 86,000.00	Growth	96.7%	MWL, MIML
C81		48	A5		25/04/2022	\$ 132,289.00	ING Living Super	YES	14/07/2022	\$ 118,532.63	\$ 114,426.65	High Growth	96.5%	MWL, MIML
C82		42	A3		26/04/2022	\$ 192,229.00	AustralianSuper	YES	14/07/2022	\$ 170,000.00	\$ 167,450.00	Growth	98.5%	MWL, MIML
C83		40	A3		26/05/2022	\$ 137,020.00	UniSuper	YES	14/07/2022	\$ 100,000.00	\$ 92,150.00	Growth	92.2%	MWL, MIML
C84		48	A8		09/06/2022	\$ 144,323.00	QSuper	YES	14/07/2022	\$ 134,323.00	\$ 131,223.00	Growth	97.7%	MWL, MIML
C85		55	A2		09/06/2022	\$ 286,655.00	Macquarie/Vic Super	YES	14/07/2022	\$ 270,000.00	\$ 265,000.00	High Growth	98.1%	MWL, MIML
C86		46	A1		14/06/2022	\$ 287,189.00	Macquarie super manager II	YES	14/07/2022	\$ 282,041.48	\$ 286,041.00	Growth, High Growth	>100%	MWL, MIML
C87		56	A3		17/06/2022	\$ 241,871.00	UniSuper Accumulation	YES	14/07/2022	\$ 243,486.12	\$ 240,386.12	Growth	98.7%	MWL, MIML
C88		41	A8		25/03/2022	\$ 99,690.00	AMP Sig Super & BT	YES	21/07/2022	\$ 94,735.23	\$ 92,730.24	Growth	97.9%	MWL, MIML
C89		53	A8		19/04/2022	\$ 200,404.00	Smart Monday	YES	21/07/2022	\$ 188,048.50	\$ 184,611.98	Balanced	98.2%	MWL, MIML
C90		55	A3		07/06/2022	\$ 285,531.00	Australian Catholic Super	YES	21/07/2022	\$ 275,531.00	\$ 273,000.00	Balanced	99.1%	MWL, MIML
C91		58	A8		13/02/2022	\$ 138,336.00	SunSuper	YES	28/07/2022	\$ 128,535.74	\$ 124,679.67	Growth	97.0%	MWL, MIML
C92		57	A8		13/02/2022	\$ 116,699.00	Macquarie Super Consolidator II	YES	28/07/2022	\$ 12,893.89	\$ 108,703.33	High Growth	>100%	MWL, MIML
C93		57	A9		13/02/2022	\$ 312,291.00	Aware	YES	28/07/2022	\$ 303,774.54	\$ 300,674.54	Growth	99.0%	MWL, MIML
C94		53	A3		07/04/2022	\$ 214,358.00	Colonial First State	YES	28/07/2022	\$ 198,783.92	\$ 194,808.24	Growth	98.0%	MWL, MIML
C95		47	A5		25/04/2022	\$ 93,971.00	Macquarie Wrap Super Accumulator	YES	28/07/2022	\$ 2,804.89	\$ 88,176.53	High Growth	>100%	MWL, MIML
C96		41	A3		14/06/2022	\$ 69,292.00	Generations Personal Super	YES	28/07/2022	\$ 50,000.00	\$ 48,000.00	Growth	96.0%	MWL, MIML
C97		40	A3		14/06/2022	\$ 136,795.00	AMP Signature Super	YES	28/07/2022	\$ 126,000.00	\$ 124,000.00	Growth	98.4%	MWL, MIML
C98		44	A5		15/06/2022	\$ 180,190.00	CBUS	YES	28/07/2022	\$ 163,023.73	\$ 157,875.64	High Growth	96.8%	MWL, MIML
C99		46	A8		13/07/2022	\$ 300,576.00	Australian Super & Plum	YES	28/07/2022	\$ 293,030.07	\$ 284,239.17	Growth	97.0%	MWL, MIML
C100		41	A4		15/03/2022	\$ 193,000.00	CBUS	YES	04/08/2022	\$ 183,000.00	\$ 179,000.00	Balanced	97.8%	MWL, MIML
C101		53	A2		21/04/2022	\$ 411,720.00	Macquarie/MLC	YES	04/08/2022	\$ 395,976.65	\$ 391,000.00	Growth	98.7%	MWL, MIML
C102		58	A5		25/05/2022	\$ 151,433.00	QSuper	YES	04/08/2022	\$ 119,839.69	\$ 115,226.00	High Growth	96.2%	MWL, MIML

C103		52	A1		22/06/2022	\$ 155,894.00	Macquarie super manager II	YES	04/08/2022	\$ 151,752.00	\$ 145,752.00	Growth	96.0%	MWL, MIML
C104		57	A1		21/07/2022	\$ 251,815.00	Macquarie super manager II	YES	04/08/2022	\$ 244,247.00	\$ 237,247.00	Balanced	97.1%	MWL, MIML
C105		50	A8		16/03/2022	\$ 187,234.00	Christian Super & Hub24 Super	YES	11/08/2022	\$ 196,741.39	\$ 192,302.04	Growth	97.7%	MWL; MIML
C106		52	A8		27/04/2022	\$ 188,251.00	Hub 24	YES	11/08/2022	\$ 168,157.72	\$ 164,794.56	Growth	98.0%	MWL, MIML
C107		57	A1		06/05/2022	\$ 342,651.00	Macquarie super manager II	YES	11/08/2022	\$ 334,422.00	\$ 326,422.00	Balanced	97.6%	MWL, MIML
C108		53	A2		01/07/2022	\$ 359,458.00	Macquarie/CFS	YES	11/08/2022	\$ 374,540.46	\$ 369,000.00	High Growth	98.5%	MWL, MIML
C109		45	A4		15/07/2022	\$ 282,055.00	MyNorth Super	YES	11/08/2022	\$ 282,055.00	\$ 277,000.00	Conservative	98.2%	MWL, MIML
C110		43	A9		21/07/2022	\$ 288,756.00	PSSap	YES	11/08/2022	\$ 296,477.04	\$ 293,377.04	High Growth	99.0%	MWL, MIML
C111		58	A6		25/07/2022	\$ 211,328.00	AustralianSuper	YES	11/08/2022	\$ 217,240.90	\$ 176,121.71	Conservative	81.1%	MWL, MIML
C112		59	A6		25/07/2022	\$ 115,837.00	Hesta & Qsuper	YES	11/08/2022	\$ 97,543.18	\$ 82,061.29	Conservative	84.1%	MWL, MIML
C113		55	A5		26/07/2022	\$ 171,407.00	Spirit Super	YES	11/08/2022	\$ 166,612.74	\$ 161,527.74	Balanced, Growth	96.9%	MWL, MIML
C114		53	A8		27/07/2022	\$ 254,172.00	Australian Catholic Super	YES	11/08/2022	\$ 246,172.00	\$ 238,786.84	Growth	97.0%	MWL, MIML
C115		45	A1		28/07/2022	\$ 126,302.00	Macquarie super manager II	YES	11/08/2022	\$ 128,374.81	\$ 122,000.00	Growth	95.0%	MWL, MIML
C116		47	A8		02/08/2022	\$ 270,224.91	Cbus	YES	11/08/2022	\$ 270,224.91	\$ 262,118.16	High Growth	97.0%	MWL, MIML
C117		44	A4		12/06/2022	\$ 382,744.00	Qsuper	YES	09/08/2022	\$ 381,000.00	\$ 377,000.00	High Growth	99.0%	MWL; MIML
C118		59	A5		04/04/2022	\$ 428,271.00	SunSuper for Life, BT Panorama Super	YES	18/08/2022	\$ 234,707.74	\$ 231,187.12	High Growth	98.5%	MWL, MIML
C119		54	A1		06/05/2022	\$ 53,941.00	Macquarie super manager II	YES	18/08/2022	\$ 48,204.00	\$ 43,000.00	Balanced	89.2%	MWL, MIML
C120		48	A5		26/05/2022	\$ 290,824.00	Russell IQ Super - For Life	YES	18/08/2022	\$ 276,743.00	\$ 269,824.43	High Growth	97.5%	MWL, MIML
C121		48	A8		27/05/2022	\$ 208,000.00	Care Super	YES	18/08/2022	\$ 90,000.00	\$ 87,550.00	Balanced	97.3%	MWL, MIML
C122		52	A5		06/06/2022	\$ 230,881.00	Beacon Super Service	YES	18/08/2022	\$ 126,077.75	\$ 121,950.81	High Growth	96.7%	MWL, MIML
C123		49	A2		27/06/2022	\$ 171,982.00	Macquarie/CFS	YES	18/08/2022	\$ 171,982.15	\$ 168,982.00	High Growth	98.3%	MWL, MIML
C124		48	A1		20/07/2022	\$ 186,296.00	Macquarie super manager II	YES	18/08/2022	\$ 197,636.00	\$ 191,636.00	High Growth	97.0%	MWL, MIML
C125		56	A9		28/07/2022	\$ 227,599.00	CFS	YES	18/08/2022	\$ 234,030.77	\$ 230,930.77	High Growth	98.7%	MWL, MIML
C126		45	A9		29/07/2022	\$ 165,216.00	BT	YES	18/08/2022	\$ 162,000.00	\$ 158,900.00	High Growth	98.1%	MWL, MIML
C127		44	A8		04/08/2022	\$ 96,544.00	AMP Sig Super	YES	18/08/2022	\$ 88,544.00	\$ 85,888.00	Balanced	97.0%	MWL, MIML
C128		55	A5		05/08/2022	\$ 67,201.00	Asgard Infinity eWrap Super (Core)	YES	18/08/2022	\$ 47,583.00	\$ 45,151.68	High Growth	94.9%	MWL, MIML
C129		49	A5		02/08/2022	\$ 130,292.00	Praemium	YES	25/08/2022	\$ 138,571.05	\$ 135,799.63	High Growth	98%	MWL, MIML, Q2T.0036.0
C130		39	A3		08/09/2021	\$ 60,028.00	MyNorth Super	YES	25/08/2022	\$ 50,000.00	\$ 48,000.00	Balanced	96.0%	MWL, MIML

C131		50	A6		22/07/2022	\$ 167,411.00	BT Super	YES	25/08/2022	\$ 179,125.55	\$ 174,647.70	High Growth	97.5%	MWL, MIML
C132		47	A8		28/07/2022	\$ 174,373.00	Aware and Hostplus	YES	25/08/2022	\$ 158,373.00	\$ 153,622.00	Growth	97.0%	MWL, MIML
C133		58	A5		05/08/2022	\$ 276,225.00	Asgard Infinity eWrap Super (Core)	YES	25/08/2022	\$ 268,225.00	\$ 262,370.50	High Growth	97.8%	MWL, MIML
C134		50	A9		05/08/2022	\$ 187,960.00	CBUS	YES	25/08/2022	\$ 177,960.00	\$ 174,860.00	High Growth	98.3%	MWL, MIML
C135		56	A1		09/08/2022	\$ 294,311.00	Macquarie super manager II	YES	25/08/2022	\$ 298,000.00	\$ 292,500.00	Growth	98.2%	MWL, MIML
C136		49	A5		05/04/2022	\$ 120,674.00	HESTA Super	YES	01/09/2022	\$ 112,674.00	\$ 109,440.52	High Growth	97.1%	MWL, MIML
C137		57	A9		11/07/2022	\$ 272,072.00	Spirit	YES	01/09/2022	\$ 256,072.00	\$ 252,972.00	Conservative	98.8%	MWL, MIML, Q2T.0036.0004.0053
C138		46	A2		26/07/2022	\$ 301,286.00	Macquarie/CBUS	YES	01/09/2022	\$ 307,834.91	\$ 302,000.00	Growth	98.1%	MWL, MIML
C139		41	A8		28/07/2022	\$ 162,097.00	MLC MasterKey Business Super	YES	01/09/2022	\$ 154,097.00	\$ 149,474.00	Growth	97.0%	MWL, MIML
C140		57	A9		02/08/2022	\$ 101,140.00	Australian Super	YES	01/09/2022	\$ 91,140.00	\$ 89,129.00	High Growth	97.8%	MWL, MIML
C141		52	A9		10/08/2022	\$ 210,235.00	Australian Super	YES	01/09/2022	\$ 200,968.95	\$ 197,868.95	High Growth	98.5%	MWL, MIML
C142		49	A1		11/08/2022	\$ 247,373.00	Macquarie super manager II	YES	01/09/2022	\$ 257,301.59	\$ 257,000.00	Growth, High Growth	99.9%	MWL, MIML
C143		51	A9		15/08/2022	\$ 281,179.00	MLC	YES	01/09/2022	\$ 286,032.00	\$ 282,932.00	Growth	98.9%	MWL, MIML
C144		53	A2		16/08/2022	\$ 357,624.00	Macquarie/Care Super	YES	01/09/2022	\$ 345,000.00	\$ 339,000.00	Growth	98.3%	MWL, MIML
C145		55	A3		18/08/2022	\$ 348,594.00	CBUS	YES	01/09/2022	\$ 340,000.00	\$ 338,000.00	High Growth	99.4%	MWL, MIML
C146		55	A3		01/04/2022	\$ 303,850.00	AMP Superleader	YES	08/09/2022	\$ 300,000.00	\$ 296,400.00	Growth	98.8%	MWL, MIML
C147		56	A1		24/05/2022	\$ 331,288.00	Macquarie super manager II	YES	08/09/2022	\$ 319,177.00	\$ 309,177.00	High Growth	96.9%	MWL, MIML
C148		55	A4		25/07/2022	\$ 207,730.00	BT Super for Life	YES	08/09/2022	\$ 207,730.93	\$ 204,000.00	Growth	98.2%	MWL, MIML
C149		54	A6		10/08/2022	\$ 448,166.00	CFS FirstChoice Employer Super	YES	08/09/2022	\$ 437,977.57	\$ 429,218.02	High Growth	98.0%	MWL, MIML
C150		53	A9		10/08/2022	\$ 269,802.00	Australian Super, CFS, BT	YES	08/09/2022	\$ 262,349.07	\$ 259,249.07	High Growth	98.8%	MWL, MIML
C151		52	A9		10/08/2022	\$ 354,561.00	Aware	YES	08/09/2022	\$ 344,561.00	\$ 341,461.00	High Growth	99.1%	MWL, MIML
C152		57	A2		17/08/2022	\$ 298,792.00	Macquarie/CFS	YES	08/09/2022	\$ 295,853.10	\$ 290,000.00	Growth	98.0%	MWL, MIML
C153		43	A3		17/08/2022	\$ 221,956.00	SunSuper Savings	YES	08/09/2022	\$ 200,000.00	\$ 192,760.00	Growth	96.4%	MWL, MIML
C154		49	A6		30/08/2022	\$ 127,865.00	Cbus	YES	08/09/2022	\$ 117,865.00	\$ 115,507.00	High Growth	98.0%	MWL, MIML
C155		55	A4		06/05/2022	\$ 157,680.00	Netwealth Super	YES	15/09/2022	\$ 157,680.20	\$ 154,800.00	Balanced	98.2%	MWL, MIML
C156		48	A5		13/06/2022	\$ 107,403.00	BT Panorama Super (Full menu)	YES	15/09/2022	\$ 106,781.06	\$ 101,509.82	High Growth	95.1%	MWL, MIML
C157		51	A8		21/06/2022	\$ 180,051.00	Mercer	YES	15/09/2022	\$ 172,051.00	\$ 169,000.00	Growth	98.2%	MWL, MIML

C158		46	A4		26/07/2022	\$ 247,500.00	CBUS	YES	15/09/2022	\$ 237,500.00	\$ 234,000.00	Growth	98.5%	MWL, MIML
C159		58	A1		04/08/2022	\$ 236,627.00	Macquarie super manager II	YES	15/09/2022	\$ 205,719.18	\$ 200,000.00	Growth	97.2%	MWL, MIML
C160		54	A2		11/08/2022	\$ 151,200.00	Macquarie/IOOF	YES	15/09/2022	\$ 151,273.82	\$ 147,000.00	High Growth	97.2%	MWL, MIML
C161		50	A2		11/08/2022	\$ 104,285.00	Macquarie/Aware Super/IOOF	YES	15/09/2022	\$ 104,797.43	\$ 102,000.00	High Growth	97.3%	MWL, MIML
C162		56	A3		19/08/2022	\$ 480,824.00	Energy Super	YES	15/09/2022	\$ 476,367.45	\$ 473,267.45	High Growth	99.3%	MWL, MIML
C163		49	A8		22/08/2022	\$ 227,311.00	Australian Super & MyNorth	YES	15/09/2022	\$ 213,592.12	\$ 208,315.25	High Growth	97.5%	MWL, MIML
C164		55	A8		29/08/2022	\$ 305,289.00	CFS FirstChoice Employer Super	YES	15/09/2022	\$ 297,289.00	\$ 291,343.00	Balanced	98.0%	MWL, MIML
C165		41	A3		30/08/2022	\$ 114,120.00	HESTA	YES	15/09/2022	\$ 104,120.00	\$ 100,620.00	High Growth	96.6%	MWL, MIML
C166		57	A8		06/09/2022	\$ 180,233.00	Hesta	YES	15/09/2022	\$ 179,834.19	\$ 176,237.51	Balanced	98.0%	MWL, MIML
C167		49	A2		14/02/2022	\$ 321,070.00	Macquarie/Australian Super	YES	21/09/2022	\$ 309,000.00	\$ 304,000.00	High Growth	98.4%	MWL, MIML
C168		60	A1		06/07/2022	\$ 148,711.00	Macquarie super manager II	YES	21/09/2022	\$ 148,711.58	\$ 146,711.00	Balanced, High Growth	98.7%	MWL, MIML
C169		46	A5		09/08/2022	\$ 392,263.00	AustralianSuper Divisions	YES	21/09/2022	\$ 382,263.00	\$ 374,882.00	High Growth	98.1%	MWL, MIML
C170		57	A6		12/09/2022	\$ 237,251.00	VicSuper	YES	29/09/2022	\$ 232,560.23	\$ 227,909.00	Growth	98%	MWL, MIML, Q2T.0069.0
C171		53	A1		17/08/2022	\$ 265,511.00	Macquarie super manager II	YES	29/09/2022	\$ 263,836.94	\$ 258,836.00	Growth	98.1%	MWL, MIML
C172		47	A3		18/08/2022	\$ 200,754.00	MLC Masterkey Business Super	YES	29/09/2022	\$ 190,754.00	\$ 184,298.00	Growth	96.6%	MWL, MIML
C173		56	A1		06/09/2022	\$ 157,627.00	Macquarie super manager II	YES	29/09/2022	\$ 157,764.00	\$ 153,764.00	Growth	97.5%	MWL, MIML
C174		47	A3		07/09/2022	\$ 244,632.00	Australia Retirement Trust	YES	29/09/2022	\$ 234,632.00	\$ 228,932.00	High Growth	97.6%	MWL, MIML
C175		49 & 47	A2		01/04/2022	\$ 245,197.00	Macquarie\IOOF\MLC	YES	06/10/2022	\$ 232,700.54	\$ 226,000.00	Balanced	97.1%	MWL, MIML
C176		54	A8		27/07/2022	\$ 132,131.00	Aware Super	YES	06/10/2022	\$ 124,131.00	\$ 120,407.00	Balanced	97.0%	MWL, MIML
C177		49	A1		01/08/2022	\$ 198,576.00	Macquarie super manager II	YES	06/10/2022	\$ 195,112.39	\$ 189,112.00	High Growth	96.9%	MWL, MIML
C178		49	A1		01/08/2022	\$ 122,941.00	Macquarie super manager II	YES	06/10/2022	\$ 114,064.26	\$ 109,000.00	High Growth	95.6%	MWL, MIML
C179		46	A2		05/08/2022	\$ 239,822.00	Macquarie/Aware Super	YES	06/10/2022	\$ 225,000.00	\$ 219,500.00	Growth	97.6%	MWL, MIML
C180		42	A5		09/08/2022	\$ 206,370.00	ANZ Staff Superannuation Personal	YES	06/10/2022	\$ 196,370.00	\$ 191,443.00	High Growth	97.5%	MWL, MIML
C181		46	A3		18/08/2022	\$ 154,265.00	Qsuper	YES	06/10/2022	\$ 144,265.00	\$ 137,725.00	Growth	95.5%	MWL, MIML
C182		54	A5		26/08/2022	\$ 269,146.00	Netwealth Super Accelerator (Core)	YES	06/10/2022	\$ 259,899.39	\$ 253,698.89	High Growth	97.6%	MWL, MIML
C183		58	A5		26/08/2022	\$ 776,440.00	Netwealth Super Accelerator	YES	06/10/2022	\$ 739,744.29	\$ 727,643.05	High Growth	98.4%	MWL, MIML
C184		52	A2		02/09/2022	\$ 236,084.00	Macquarie/Active Super	YES	06/10/2022	\$ 230,000.00	\$ 224,000.00	High Growth	97.4%	MWL, MIML

C185		46	A6		02/09/2022	\$ 445,870.00	Active Super, Aware & Netwealth	YES	06/10/2022	\$ 329,941.34	\$ 323,342.51	High Growth	98.0%	MWL, MIML
C186		44	A6		12/09/2022	\$ 151,843.00	Hesta	YES	06/10/2022	\$ 138,092.00	\$ 135,330.16	Growth	98.0%	MWL, MIML
C187		52	A6		12/09/2022	\$ 202,222.00	Active Super & Qsuper	YES	06/10/2022	\$ 182,678.36	\$ 133,934.87	Growth	73.3%	MWL, MIML
C188		55	A1		15/09/2022	\$ 347,104.00	Macquarie super manager II	YES	06/10/2022	\$ 333,103.02	\$ 329,684.00	Growth, High Growth	99.0%	MWL, MIML
C189		58	A1		18/08/2022	\$ 300,397.00	Macquarie super manager II	YES	13/10/2022	\$ 287,000.00	\$ 281,000.00	Balanced	97.9%	MWL, MIML
C190		46	A8		01/09/2022	\$ 282,681.00	Aware and Uni Super	YES	13/10/2022	\$ 274,665.29	\$ 265,325.05	Growth	96.6%	MWL, MIML
C191		57	A6		29/09/2022	\$ 166,481.00	Hesta & MLC MasterKey Personal Super	YES	13/10/2022	\$ 160,110.15	\$ 156,907.95	Growth	98.0%	MWL, MIML
C192		55 & 53	A2		19/04/2022	\$ 532,774.00	Macquarie/BT/Russell/CF S	YES	20/10/2022	\$ 542,788.96	\$ 520,000.00	High Growth	95.8%	MWL, MIML
C193		47	A6		13/09/2022	\$ 101,472.00	AMP SignatureSuper	YES	20/10/2022	\$ 88,175.84	\$ 85,530.56	High Growth	97.0%	MWL, MIML
C194		57	A6		07/10/2022	\$ 255,219.00	BT Super for Life	YES	20/10/2022	\$ 239,529.00	\$ 234,738.42	Growth	98.0%	MWL, MIML
C195		46	A1		07/10/2022	\$ 130,769.00	Macquarie super manager II	YES	20/10/2022	\$ 120,000.00	\$ 116,000.00	High Growth	96.7%	MWL, MIML
C196		51	A1		10/10/2022	\$ 226,099.00	Macquarie super manager II	YES	20/10/2022	\$ 221,478.00	\$ 215,478.00	High Growth	97.3%	MWL, MIML
C197		56	A6		11/10/2022	\$ 243,003.00	Plum Super	YES	20/10/2022	\$ 239,801.00	\$ 235,004.98	Balanced	98.0%	MWL, MIML
C198		52	A1		01/08/2022	\$ 65,752.00	Macquarie super manager II	YES	27/10/2022	\$ 58,272.00	\$ 55,272.00	Growth	94.9%	MWL, MIML
C199		49	A5		15/08/2022	\$ 284,179.00	BT Panorama Super (Compact menu)	YES	27/10/2022	\$ 269,636.05	\$ 263,263.33	High Growth	97.6%	MWL, MIML
C200		47	A5		05/09/2022	\$ 209,687.00	Unisuper	YES	27/10/2022	\$ 193,985.67	\$ 189,125.96	High Growth	97.5%	MWL, MIML
C201		56	A1		16/09/2022	\$ 186,153.00	Macquarie super manager II	YES	27/10/2022	\$ 178,000.00	\$ 173,000.00	Growth	97.2%	MWL, MIML
C202		58	A6		20/09/2022	\$ 388,536.00	ART	YES	27/10/2022	\$ 375,556.00	\$ 368,044.88	Growth	98.0%	MWL, MIML
C203		49	A5		10/10/2022	\$ 250,180.00	Australian Super	YES	27/10/2022	\$ 240,180.00	\$ 234,376.00	High Growth	97.6%	MWL, MIML
C204		48	A9		11/10/2022	\$ 228,700.00	VicSuper	YES	27/10/2022	\$ 221,000.00	\$ 219,000.00	Growth	99.1%	MWL, MIML
C205		48	A5		16/10/2022	\$ 409,508.00	EISS Super	YES	27/10/2022	\$ 399,508.00	\$ 390,518.00	High Growth	97.7%	MWL, MIML
C206		58	A5		04/10/2022	\$ 184,922.00	Praemium	YES	03/11/2022	\$ 195,312.20	\$ 191,405.96	High Growth	98%	MWL, MIML, Q2T.0036.0
C207		48	A3		08/09/2021	\$ 60,028.00	MyNorth Super	YES	03/11/2022	\$ 72,818.25	\$ 70,000.00	Conservative, Growth	96.1%	MWL, MIML
C208		47	A4		22/06/2022	\$ 325,000.00	Qsuper	YES	03/11/2022	\$ 315,000.00	\$ 311,000.00	High Growth	98.7%	MWL, MIML
C209		49	A3		30/08/2022	\$ 276,694.00	Catholic Super	YES	03/11/2022	\$ 260,000.00	\$ 254,000.00	Growth	97.7%	MWL, MIML
C210		48	A5		01/09/2022	\$ 338,158.00	Aware Super	YES	03/11/2022	\$ 328,158.00	\$ 321,269.16	High Growth	97.9%	MWL, MIML
C211		38	A3		06/09/2022	\$ 171,465.00	BUSSQ MySuper	YES	03/11/2022	\$ 150,000.00	\$ 143,900.00	Growth	95.9%	MWL, MIML

C212		39	A3		06/09/2022	\$ 116,838.00	AMP, Qsuper	YES	03/11/2022	\$ 75,422.00	\$ 68,100.00	Growth	90.3%	MWL, MIML
C213		48	A6		13/09/2022	\$ 190,989.00	AMP SignatureSuper	YES	03/11/2022	\$ 172,538.17	\$ 169,087.41	High Growth	98.0%	MWL, MIML
C214		55	A9		22/09/2022	\$ 150,660.00	Aware, MyNorth	YES	03/11/2022	\$ 7,756.00	\$ 4,656.00	Growth	60.0%	MWL, MIML
C215		54	A9		29/09/2022	\$ 215,265.00	ART	YES	03/11/2022	\$ 209,716.89	\$ 206,616.89	High Growth	98.5%	MWL, MIML
C216		43	A2		03/10/2022	\$ 157,542.00	Macquarie/Spirit Super	YES	03/11/2022	\$ 142,000.00	\$ 138,000.00	Growth	97.2%	MWL, MIML
C217		54	A2		05/10/2022	\$ 115,000.00	Macquarie Super Manager II/ING	YES	03/11/2022	\$ 109,000.00	\$ 105,000.00	Growth	96.3%	MWL, MIML
C218		54	A2		05/10/2022	\$ 323,572.00	Macquarie Super Manager II and ING	YES	03/11/2022	\$ 328,000.00	\$ 322,000.00	Growth	98.2%	MWL, MIML
C219		55	A2		11/10/2022	\$ 242,084.00	Macquarie/BT Super for Life	YES	03/11/2022	\$ 224,000.00	\$ 219,000.00	Growth	97.8%	MWL, MIML
C220		44	A5		17/10/2022	\$ 186,811.00	Praemium	YES	10/11/2022	\$ 194,081.05	\$ 190,199.43	High Growth	98%	MWL, MIML, Q2T.0036.0
C221		45	A5		15/06/2022	\$ 203,669.00	CBUS	YES	10/11/2022	\$ 193,699.00	\$ 188,845.02	High Growth	97.5%	MWL, MIML
C222		45	A6		29/09/2022	\$ 207,108.00	Aware	YES	10/11/2022	\$ 195,570.00	\$ 191,658.60	Growth	98.0%	MWL, MIML
C223		56	A8		18/10/2022	\$ 133,610.00	netwealth Super Accelerator (Plus)	YES	10/11/2022	\$ 130,280.33	\$ 126,455.01	Growth	97.1%	MWL, MIML
C224		56	A2		26/10/2022	\$ 195,092.00	Macquarie Super Manager II/CFS	YES	10/11/2022	\$ 204,748.11	\$ 199,000.00	Growth	97.2%	MWL, MIML
C225		44	A5		26/10/2022	\$ 206,069.00	QSuper Accumulation Account	YES	10/11/2022	\$ 196,069.00	\$ 191,167.62	High Growth	97.5%	MWL, MIML
C226		47	A2		26/10/2022	\$ 256,415.00	Macquarie/CBUS	YES	10/11/2022	\$ 251,000.00	\$ 247,000.00	High Growth	98.4%	MWL, MIML
C227		57	A9		28/07/2022	\$ 267,080.00	CFS	YES	17/11/2022	\$ 264,453.04	\$ 261,453.04	Growth	98.9%	MWL, MIML
C228		59	A1		05/08/2022	\$ 187,365.00	Macquarie super manager II	YES	17/11/2022	\$ 193,643.47	\$ 188,643.00	Growth	97.4%	MWL, MIML
C229		47	A8		29/08/2022	\$ 206,483.00	Australian Super	YES	17/11/2022	\$ 192,000.00	\$ 185,140.00	High Growth	96.4%	MWL, MIML
C230		43	A6		29/08/2022	\$ 165,720.00	ANZ Smart Choice Super	YES	17/11/2022	\$ 165,000.00	\$ 160,875.00	High Growth	97.5%	MWL, MIML
C231		58	A2		13/09/2022	\$ 422,643.00	Macquarie/Russell	YES	17/11/2022	\$ 411,000.00	\$ 404,000.00	Growth	98.3%	MWL, MIML
C232		46	A3		19/09/2022	\$ 29,348.00	Care Super	YES	17/11/2022	\$ 19,000.00	\$ 17,000.00	Growth	89.5%	MWL, MIML
C233		45	A3		19/09/2022	\$ 252,302.00	Care Super	YES	17/11/2022	\$ 230,000.00	\$ 225,000.00	Growth	97.8%	MWL, MIML
C234		59	A1		30/09/2022	\$ 154,470.00	Macquarie super manager II	YES	17/11/2022	\$ 152,000.00	\$ 146,000.00	Balanced	96.1%	MWL, MIML
C235		56	A4		20/10/2022	\$ 164,211.00	CFS Super	YES	17/11/2022	\$ 164,211.55	\$ 160,000.00	Growth	97.4%	MWL, MIML
C236		55	A9		20/10/2022	\$ 290,148.00	Aware, Uni Super	YES	17/11/2022	\$ 285,763.36	\$ 282,763.00	High Growth	99.0%	MWL, MIML
C237		44	A9		07/11/2022	\$ 223,138.00	Australian Super	YES	17/11/2022	\$ 217,138.00	\$ 214,138.00	Growth	98.6%	MWL, MIML
C238		46	A5		17/10/2022	\$ 56,956.00	Praemium	YES	24/11/2022	\$ 58,754.82	\$ 56,639.65	High Growth	96%	MWL, MIML, Q2T.0036.0
C239		55	A2		06/09/2022	\$ 105,455.00	Macquarie/AMP	YES	24/11/2022	\$ 107,632.99	\$ 104,000.00	Growth	96.6%	MWL, MIML

C240		41	A8		19/10/2022	\$ 202,279.00	PSS Super & Aware	YES	24/11/2022	\$ 183,279.00	\$ 176,680.63	Growth	96.4%	MWL, MIML
C241		55	A6		21/10/2022	\$ 139,915.00	Aware	YES	24/11/2022	\$ 133,864.00	\$ 130,517.40	High Growth	97.5%	MWL, MIML
C242		61	A6		21/10/2022	\$ 254,297.00	CFS FirstChoice W'sale Super	YES	24/11/2022	\$ 265,748.51	\$ 260,433.54	Balanced	98.0%	MWL, MIML
C243		53	A9		24/10/2022	\$ 415,540.00	Spirit	YES	24/11/2022	\$ 412,000.00	\$ 409,000.00	High Growth	99.3%	MWL, MIML
C244		44	A8		24/10/2022	\$ 143,878.00	TWU Super	YES	24/11/2022	\$ 133,878.00	\$ 129,862.00	Balanced	97.0%	MWL, MIML
C245		51	A9		28/10/2022	\$ 129,083.00	Aware, ART	YES	24/11/2022	\$ 117,083.00	\$ 114,083.00	High Growth	97.4%	MWL, MIML
C246		31	A8		29/10/2022	\$ 51,651.00	MLC MasterKey Business Super	YES	24/11/2022	\$ 52,344.05	\$ 50,223.73	Growth	95.9%	MWL, MIML
C247		41	A8		30/10/2022	\$ 150,489.00	BT Super for Life	YES	24/11/2022	\$ 145,848.09	\$ 140,922.64	High Growth	96.6%	MWL, MIML
C248		40	A8		02/11/2022	\$ 174,175.00	VicSuper	YES	24/11/2022	\$ 166,745.00	\$ 161,743.00	Growth	97.0%	MWL, MIML
C249		57	A2		07/11/2022	\$ 204,851.00	Macquarie/Brighter Super	YES	24/11/2022	\$ 209,000.00	\$ 205,000.00	Growth	98.1%	MWL, MIML
C250		61	A6		15/11/2022	\$ 128,260.00	MLC MasterKey Super Fundamentals	YES	01/12/2022	\$ 132,392.26	\$ 129,082.45	Growth	97%	MWL, MIML, Q2T.0036.0
C251		-	A2		10/11/2022	\$ 518,440.00	Russell Investments Super Series	YES	01/12/2022	\$ 525,000.00	\$ 515,000.00	Growth	98%	MWL, MIML, Q2T.0036.0
C252		53	A6		07/10/2022	\$ 229,202.00	Aware	YES	01/12/2022	\$ 230,000.00	\$ 225,400.00	Growth	98.0%	MWL, MIML
C253		52	A9		13/10/2022	\$ 217,708.00	Netwealth	YES	01/12/2022	\$ 207,000.00	\$ 204,000.00	High Growth	98.6%	MWL, MIML
C254		58	A8		18/10/2022	\$ 360,832.00	Qsuper	YES	01/12/2022	\$ 350,832.00	\$ 340,307.00	Growth	97.0%	MWL, MIML
C255		55	A6		31/10/2022	\$ 148,837.00	AustralianSuper	YES	01/12/2022	\$ 146,463.00	\$ 142,801.43	Growth	97.5%	MWL, MIML
C256		41	A5		04/11/2022	\$ 164,003.00	MLC MasterKey Personal Super	YES	01/12/2022	\$ 154,003.00	\$ 149,153.00	High Growth	96.9%	MWL, MIML
C257		55	A9		08/11/2022	\$ 194,487.00	Commbank,Qsuper	YES	01/12/2022	\$ 189,336.71	\$ 186,336.71	High Growth	98.4%	MWL, MIML
C258		55	A1		09/11/2022	\$ 171,830.00	Macquarie super manager II	YES	01/12/2022	\$ 180,000.00	\$ 174,000.00	Growth	96.7%	MWL, MIML
C259		55	A2		11/11/2022	\$ 387,215.00	Macquarie/ART	YES	01/12/2022	\$ 388,000.00	\$ 383,000.00	Growth	98.7%	MWL, MIML
C260		52	A2		20/10/2022	\$ 179,706.00	Praemium Watershed	YES	08/12/2022	\$ 186,138.41	\$ 181,000.00	High Growth	97%	MWL, MIML, Q2T.0036.0
C261		56	A5		11/10/2022	\$ 187,953.00	Praemium	YES	08/12/2022	\$ 197,695.20	\$ 193,741.30	High Growth	98%	MWL, MIML, Q2T.0036.0
C262		57	A5		11/10/2022	\$ 81,473.00	Praemium	YES	08/12/2022	\$ 85,850.09	\$ 83,274.59	Conservative	97%	MWL, MIML, Q2T.0036.0
C263		44	A2		07/11/2022	\$ 170,900.00	Praemium/ANZ Smart Choice	YES	08/12/2022	\$ 160,169.77	\$ 155,169.00	High Growth	97%	MWL, MIML, Q2T.0036.0
C264		44	A5		14/11/2022	\$ 137,367.00	REST, Praemium	YES	08/12/2022	\$ 138,646.22	\$ 135,180.06	High Growth	97%	MWL, MIML, Q2T.0036.0
C265		36	A5		08/11/2022	\$ 273,308.00	Praemium SuperSMA	YES	08/12/2022	\$ 301,637.77	\$ 296,206.16	High Growth	98%	MWL, MIML, Q2T.0036.0
C266		38	A5		07/11/2022	\$ 191,640.00	Praemium	YES	08/12/2022	\$ 213,687.04	\$ 209,412.60	High Growth	98%	MWL, MIML, Q2T.0036.0
C267		48	A5		04/11/2022	\$ 291,446.00	Praemium	YES	08/12/2022	\$ 306,777.15	\$ 301,255.16	High Growth	98%	MWL, MIML, Q2T.0036.0
C268		49	A3		30/09/2022	\$ 116,543.00	Plum NAB Group Super Fund	YES	08/12/2022	\$ 100,000.00	\$ 93,000.00	High Growth	93.0%	MWL, MIML
C269		44	A1		12/10/2022	\$ 1,425,374.00	Macquarie super manager II	YES	08/12/2022	\$ 147,155.00	\$ 141,129.00	Growth	95.9%	MWL, MIML

C270		47	A5		20/10/2022	\$ 179,083.00	Australian Super	YES	08/12/2022	\$ 169,083.00	\$ 163,880.93	High Growth	96.9%	MWL, MIML
C271		54	A1		24/10/2022	\$ 284,896.00	Macquarie super manager II	YES	08/12/2022	\$ 300,000.00	\$ 295,000.00	High Growth	98.3%	MWL, MIML
C272		52	A2		04/11/2022	\$ 401,796.00	Macquarie/BT Super for Life	YES	08/12/2022	\$ 405,000.00	\$ 400,000.00	Growth	98.8%	MWL, MIML
C273		41	A5		15/11/2022	\$ 389,884.00	Mine Super	YES	08/12/2022	\$ 409,748.41	\$ 401,390.94	High Growth	98.0%	MWL, MIML
C274		48	A8		21/11/2022	\$ 636,575.00	Plum Super and Australian Super	YES	08/12/2022	\$ 633,894.61	\$ 621,216.72	Growth	98.0%	MWL, MIML
C275		50	A6		28/11/2022	\$ 307,711.00	Electricity Industry Super	YES	08/12/2022	\$ 303,719.00	\$ 297,644.62	High Growth	98.0%	MWL, MIML
C276		40	A2		21/11/2022	\$ 179,256.00	Praemium	YES	15/12/2022	\$ 173,420.72	\$ 169,000.00	High Growth	97%	MWL, MIML, Q2T.0036.0
C277		51	A5		21/11/2022	\$ 296,301.00	Praemium	YES	15/12/2022	\$ 301,703.59	\$ 295,669.52	High Growth	98%	MWL, MIML, Q2T.0036.0
C278		50	A2		10/11/2022	\$ 194,389.00	Praemium	YES	15/12/2022	\$ 197,042.31	\$ 193,000.00	Growth	98%	MWL, MIML, Q2T.0036.0
C279		51	A3		30/09/2022	\$ 113,183.00	Netwealth	YES	15/12/2022	\$ 118,735.94	\$ 111,000.00	High Growth	93.5%	MWL, MIML
C280		54	A9		21/11/2022	\$ 611,878.00	Aware, Telstra	YES	15/12/2022	\$ 209,000.00	\$ 207,000.00	High Growth	99.0%	MWL, MIML
C281		54	A2		24/11/2022	\$ 200,000.00	Macquarie Super Manager II/Bank Account	YES	15/12/2022	\$ 200,000.00	\$ 198,000.00	Growth	99.0%	MWL, MIML
C282		52	A2		24/11/2022	\$ 130,579.00	Macquarie/CFS	YES	15/12/2022	\$ 131,890.82	\$ 127,000.00	Growth	96.3%	MWL, MIML
C283		49	A9		01/12/2022	\$ 230,243.00	ART	YES	15/12/2022	\$ 225,484.84	\$ 223,484.00	High Growth	99.1%	MWL, MIML
C284		45	A5		17/11/2022	\$ 511,245.00	N/A	YES	22/12/2022	\$ 517,119.97	\$ 506,777.57	High Growth	98%	MWL, MIML, Q2T.0036.0
C285		39	A5		21/11/2022	\$ 162,575.00	Praemium	YES	22/12/2022	\$ 172,659.20	\$ 14,000.00	High Growth	8%	MWL, MIML, Q2T.0036.0
C286		47	A5		18/10/2022	\$ 235,601.00	Mine Super	YES	22/12/2022	\$ 225,601.00	\$ 220,108.98	High Growth	97.6%	MWL, MIML
C287		34	A5		18/10/2022	\$ 45,543.00	Mine Super	YES	22/12/2022	\$ 35,543.00	\$ 33,290.85	High Growth	93.7%	MWL, MIML
C288		46	A5		25/10/2022	\$ 221,049.00	REST Super	YES	22/12/2022	\$ 229,716.12	\$ 224,141.80	High Growth	97.6%	MWL, MIML
C289		40	A8		04/11/2022	\$ 293,642.00	Spirit Super	YES	22/12/2022	\$ 285,642.00	\$ 277,073.00	High Growth	97.0%	MWL, MIML
C290		44	A5		11/11/2022	\$ 194,196.00	MLC MasterKey Super Fundamentals, Mine Super	YES	22/12/2022	\$ 187,673.08	\$ 73,766.64	High Growth	39.3%	MWL, MIML
C291		42	A2		18/11/2022	\$ 151,000.00	Macquarie Super Manager II/CBUS	YES	22/12/2022	\$ 149,000.00	\$ 145,000.00	Growth	97.3%	MWL, MIML
C292		46	A9		21/11/2022	\$ 177,796.00	BT	YES	22/12/2022	\$ 171,000.00	\$ 169,000.00	Growth	98.8%	MWL, MIML
C293		51	A9		22/11/2022	\$ 198,462.00	Vision	YES	22/12/2022	\$ 176,915.00	\$ 174,915.00	High Growth	98.9%	MWL, MIML
C294		51	A5		22/11/2022	\$ 114,305.00	Brighter Super	YES	22/12/2022	\$ 104,305.00	\$ 100,690.85	High Growth	96.5%	MWL, MIML
C295		53	A5		22/11/2022	\$ 188,366.00	AMP Signature Super	YES	22/12/2022	\$ 194,587.13	\$ 190,205.39	High Growth	97.7%	MWL, MIML
C296		44	A6		23/11/2022	\$ 166,928.00	Cbus & Mercer Super Trust	YES	22/12/2022	\$ 159,715.82	\$ 156,521.50	Growth	98.0%	MWL, MIML
C297		52	A6		23/11/2022	\$ 222,158.00	Russell IQ Super	YES	22/12/2022	\$ 219,906.00	\$ 215,507.88	Growth	98.0%	MWL, MIML
C298		48	A1		28/11/2022	\$ 125,086.00	Macquarie super manager II	YES	22/12/2022	\$ 125,485.66	\$ 120,485.00	Growth	96.0%	MWL, MIML

C299		55	A3		28/11/2022	\$ 91,638.00	BT Super	YES	22/12/2022	\$ 331,000.00	\$ 320,510.00	Growth	96.8%	MWL, MIML
C300		59	A3		28/11/2022	\$ 91,638.00	BT Super	YES	22/12/2022	\$ 92,124.75	\$ 90,000.00	Growth	97.7%	MWL, MIML
C301		50	A9		02/12/2022	\$ 148,480.00	Spirit, MyNorth, AIA	YES	22/12/2022	\$ 61,451.75	\$ 45,883.00	High Growth	74.7%	MWL, MIML
C302		46	A2		05/12/2022	\$ 341,320.00	Macquarie/AMP	YES	22/12/2022	\$ 345,844.29	\$ 341,000.00	High Growth	98.6%	MWL, MIML
C303		59	A2		07/12/2022	\$ 166,761.00	Macquarie/CBA Super	YES	22/12/2022	\$ 156,000.00	\$ 151,000.00	Growth	96.8%	MWL, MIML
C304		48	A5		21/11/2022	\$ 215,352.00	Praemium	YES	29/12/2022	\$ 215,446.27	\$ 211,137.34	High Growth	98%	MWL, MIML, Q2T.0036.0
C305		54	A5		15/11/2022	\$ 415,754.00	Praemium	YES	29/12/2022	\$ 432,324.13	\$ 424,542.30	High Growth	98%	MWL, MIML, Q2T.0036.0
C306		48	A5		23/11/2022	\$ 328,649.00	Praemium and AustralianSuper	YES	29/12/2022	\$ 317,808.19	\$ 311,452.03	High Growth	98%	MWL, MIML, Q2T.0036.0
C307		55	A2		06/12/2022	\$ 205,763.00	Praemium	YES	29/12/2022	\$ 200,893.06	\$ 197,000.00	High Growth	98%	MWL, MIML, Q2T.0036.0
C308		55	A9		04/11/2022	\$ 207,485.00	HostPLus	YES	29/12/2022	\$ 208,000.00	\$ 206,000.00	High Growth	99.0%	MWL, MIML
C309		42	A5		13/12/2022	\$ 394,924.00	Qsuper	YES	29/12/2022	\$ 381,924.00	\$ 374,049.00	High Growth	97.9%	MWL, MIML
C310		52	A6		14/12/2022	\$ 276,093.00	AustralianSuper	YES	29/12/2022	\$ 271,318.00	\$ 265,891.64	Growth	98.0%	MWL, MIML
C311		54	A6		14/12/2022	\$ 202,197.00	AustralianSuper	YES	29/12/2022	\$ 191,307.00	\$ 187,480.86	Growth	98.0%	MWL, MIML
C312		44	A4		17/10/2022	\$ 291,000.00	Australian Super	YES	05/01/2023	\$ 281,000.00	\$ 277,000.00	Growth	98.6%	MWL, MIML
C313		38	A5		11/11/2022	\$ 281,943.00	Mine Super	YES	05/01/2023	\$ 271,943.00	\$ 265,511.40	High Growth	97.6%	MWL, MIML
C314		52	A2		18/10/2022	\$ 416,526.00	Praemium	YES	12/01/2023	\$ 435,169.63	\$ 430,000.00	High Growth	99%	MWL, MIML, Q2T.0036.0
C315		46	A2		16/11/2022	\$ 150,649.00	Praemium, AMP, MLC Masterkey	YES	12/01/2023	\$ 136,046.73	\$ 133,000.00	High Growth	98%	MWL, MIML, Q2T.0036.0
C316		44	A9		14/12/2022	\$ 122,487.00	MyNorth	YES	12/01/2023	\$ 115,898.31	\$ 113,000.00	High Growth	97.5%	MWL, MIML
C317		55	A5		28/11/2022	\$ 194,919.00	BT Panorama and Praemium	YES	19/01/2023	\$ 179,419.48	\$ 167,184.73	High Growth	93%	MWL, MIML, Q2T.0036.0
C318		52	A5		15/08/2022	\$ 224,050.00	HESTA	YES	19/01/2023	\$ 214,050.00	\$ 208,789.00	High Growth	97.5%	MWL, MIML
C319		55	A2		02/11/2022	\$ 149,066.00	Macquarie/Macquarie	YES	19/01/2023	\$ 148,165.06	\$ 146,000.00	Growth	98.5%	MWL, MIML
C320		57	A6		08/12/2022	\$ 167,161.00	Hostplus	YES	19/01/2023	\$ 167,693.84	\$ 164,339.96	Balanced	98.0%	MWL, MIML
C321		44	A9		02/11/2022	\$ 265,154.00	CBUS	YES	25/01/2023	\$ 273,000.00	\$ 271,000.00	High Growth	99.3%	MWL, MIML
C322		49	A6		22/11/2022	\$ 427,166.00	Commonwealth Bank Group Super	YES	25/01/2023	\$ 432,650.00	\$ 423,997.00	Growth	98.0%	MWL, MIML
C323		47	A6		22/11/2022	\$ 146,977.00	Legal Super	YES	25/01/2023	\$ 138,534.00	\$ 135,070.65	Growth	97.5%	MWL, MIML
C324		48	A8		06/12/2022	\$ 224,178.00	Australian Super	YES	25/01/2023	\$ 216,178.00	\$ 209,693.00	High Growth	97.0%	MWL, MIML
C325		53	A8		12/12/2022	\$ 91,859.00	BT Panorama Super (Compact menu) & Rest	YES	25/01/2023	\$ 82,131.17	\$ 79,667.23	Growth	97.0%	MWL, MIML
C326		35	A5		21/11/2022	\$ 110,115.00	Praemium	YES	02/02/2023	\$ 94,907.99	\$ 92,060.75	High Growth	97%	MWL, MIML, Q2T.0036.0
C327		50	A5		27/10/2022	\$ 135,955.00	Praemium	YES	02/02/2023	\$ 25,175.80	\$ 23,675.80	High Growth	94%	MWL, MIML, Q2T.0036.0
C328		51	A5		06/01/2023	\$ 176,432.00	Praemium	YES	02/02/2023	\$ 185,190.96	\$ 181,116.76	High Growth	98%	MWL, MIML, Q2T.0036.0

C329		48	A5		05/01/2023	\$ 147,983.00	Praemium	YES	02/02/2023	\$ 154,330.91	\$ 150,935.63	High Growth	98%	MWL, MIML, Q2T.0036.0
C330		56	A5		17/01/2023	\$ 480,113.00	Praemium	YES	02/02/2023	\$ 489,297.69	\$ 4,000.00	High Growth	1%	MWL, MIML, Q2T.0036.0
C331		43	A5		19/01/2023	\$ 147,078.00	Praemium, Spirit Super	YES	02/02/2023	\$ 6,325.62	\$ 5,000.00	High Growth	79%	MWL, MIML, Q2T.0036.0
C332		49	A2		12/08/2022	\$ 213,647.00	Macquarie/Aware Super/Hesta	YES	02/02/2023	\$ 206,000.00	\$ 202,000.00	Growth	98.1%	MWL, MIML
C333		56	A4		29/11/2022	\$ 411,100.00	Spirit Super	YES	02/02/2023	\$ 401,100.00	\$ 398,000.00	Conservative	99.2%	MWL, MIML
C334		55	A8		06/12/2022	\$ 243,821.00	Australian Super & PSS	YES	02/02/2023	\$ 130,672.00	\$ 126,752.00	High Growth	97.0%	MWL, MIML
C335		53	A8		12/12/2022	\$ 602,668.00	Colonial First State FirstChoice Wholesale Personal Super	YES	02/02/2023	\$ 640,997.73	\$ 628,177.77	Growth	98.0%	MWL, MIML
C336		38	A3		12/12/2022	\$ 141,857.00	CBUS	YES	02/02/2023	\$ 143,801.43	\$ 137,000.00	Growth	95.3%	MWL, MIML
C337		58	A1		24/01/2023	\$ 171,205.00	Macquarie super manager II	YES	02/02/2023	\$ 181,000.00	\$ 176,000.00	Growth	97.2%	MWL, MIML
C338		50	A5		09/01/2023	\$ 168,758.00	Praemium, LUCRF Super	Yes	09/02/2023	\$ 157,409.30	\$ 153,946.30	High Growth	98%	MWL, MIML, Q2T.0036.0005.6154
C339		54	A5		18/10/2022	\$ 176,988.00	Spirit Super, Praemium	YES	09/02/2023	\$ 180,805.29	\$ 177,189.18	High Growth	98%	MWL, MIML, Q2T.0036.0
C340		53	A5		09/01/2023	\$ 159,175.00	PSSap, Praemium	YES	09/02/2023	\$ 171,888.70	\$ 168,107.15	High Growth	98%	MWL, MIML, Q2T.0036.0
C341		46	A2		19/12/2022	\$ 525,955.00	Praemium/Hostplus	YES	09/02/2023	\$ 532,999.40	\$ 527,500.00	High Growth	99%	MWL, MIML, Q2T.0036.0
C342		57	A2		09/12/2022	\$ 224,751.00	Praemium	YES	09/02/2023	\$ 211,965.34	\$ 207,500.00	High Growth	98%	MWL, MIML, Q2T.0036.0
C343		58	A6		08/12/2022	\$ 162,217.00	ART & Aware	YES	09/02/2023	\$ 157,236.64	\$ 154,091.91	High Growth	98.0%	MWL, MIML
C344		47	A3		22/12/2022	\$ 199,482.00	REST Super	YES	09/02/2023	\$ 198,613.00	\$ 191,913.00	High Growth	96.6%	MWL, MIML
C345		54	A1		16/01/2023	\$ 264,563.00	Macquarie super manager II	YES	09/02/2023	\$ 264,563.00	\$ 255,000.00	Growth	96.4%	MWL, MIML
C346		50	A1		16/01/2023	\$ 209,169.00	Macquarie super manager II	YES	09/02/2023	\$ 209,000.00	\$ 190,000.00	Growth	90.9%	MWL, MIML
C347		52	A5		21/01/2023	\$ 206,685.00	Praemium, Spirit Super	YES	16/02/2023	\$ 204,480.65	\$ 200,391.04	High Growth	98%	MWL, MIML, Q2T.0036.0
C348		48	A2		05/12/2022	\$ 195,556.00	Praemium	YES	16/02/2023	\$ 188,689.88	\$ 185,689.00	High Growth	98%	MWL, MIML, Q2T.0036.0
C349		56	A5		26/01/2023	\$ 145,309.00	Praemium	YES	16/02/2023	\$ 147,502.74	\$ 143,605.10	High Growth	97%	MWL, MIML, Q2T.0036.0
C350		53	A5		23/01/2023	\$ 274,078.00	Praemium	YES	16/02/2023	\$ 284,645.95	\$ 279,522.32	Balanced	98%	MWL, MIML, Q2T.0036.0
C351		49	A5		01/02/2023	\$ 127,073.00	Praemium	YES	16/02/2023	\$ 131,096.45	\$ 127,163.56	High Growth	97%	MWL, MIML, Q2T.0036.0
C352		39	A6		08/12/2022	\$ 139,693.00	Rest	YES	16/02/2023	\$ 136,043.00	\$ 133,322.00	Growth	98.0%	MWL, MIML
C353		43	A2		12/12/2022	\$ 96,140.00	Macquarie/IOOF	YES	16/02/2023	\$ 86,000.00	\$ 82,500.00	High Growth	95.9%	MWL, MIML
C354		51	A6		10/01/2023	\$ 92,777.00	AMP SignatureSuper	YES	16/02/2023	\$ 85,160.00	\$ 81,753.60	High Growth	96.0%	MWL, MIML
C355		58	A2		20/01/2023	\$ 88,810.00	Macquarie/ART	YES	16/02/2023	\$ 72,000.00	\$ 68,000.00	Growth	94.4%	MWL, MIML
C356		62	A2		20/01/2023	\$ 218,204.00	Macquarie/ART	YES	16/02/2023	\$ 210,000.00	\$ 206,000.00	Growth	98.1%	MWL, MIML
C357		45	A6		01/02/2023	\$ 239,629.00	AMP SignatureSuper	YES	16/02/2023	\$ 243,942.25	\$ 239,063.00	High Growth	98.0%	MWL, MIML
C358		48	A1		09/02/2023	\$ 444,337.00	Macquarie super manager II	YES	16/02/2023	\$ 452,589.00	\$ 447,589.00	Growth	98.9%	MWL, MIML

C359		45	A5		12/12/2022	\$ 186,057.00	Praemium Partner SuperSMA	YES	16/02/2023	\$ 180,536.09	\$ 176,925.37	High Growth	98.0%	MWL, MIML, Q2T.0036.0005.6198
C360		56	A5		17/01/2023	\$ 134,016.00	Praemium	YES	23/02/2023	\$ 139,559.14	\$ 136,488.84	High Growth	98%	MWL, MIML, Q2T.0036.0
C361		55	A5		07/02/2023	\$ 208,155.00	Praemium	YES	23/02/2023	\$ 211,326.87	\$ 207,100.33	High Growth	98%	MWL, MIML, Q2T.0036.0
C362		63	A1		16/09/2022	\$ 14,018.00	Macquarie super manager II	YES	23/02/2023	\$ 159,494.52	\$ 61,597.80	Growth	38.6%	MWL, MIML
C363		57	A5		23/11/2022	\$ 180,895.00	North Personal Super	YES	23/02/2023	\$ 184,306.47	\$ 177,807.28	High Growth	96.5%	MWL, MIML
C364		46	A6		08/12/2022	\$ 187,415.00	Spirit Super	YES	23/02/2023	\$ 183,613.00	\$ 179,940.00	Growth	98.0%	MWL, MIML
C365		40	A1		08/12/2022	\$ 135,301.00	Macquarie super manager II	YES	23/02/2023	\$ 141,833.00	\$ 138,017.00	Growth	97.3%	MWL, MIML
C366		41	A2		12/12/2022	\$ 128,231.00	Macquarie/Mercer	YES	23/02/2023	\$ 129,054.43	\$ 125,500.00	High Growth	97.2%	MWL, MIML
C367		51	A4		26/01/2023	\$ 249,082.00	Australian Super, ANZ Smart Choice	YES	23/02/2023	\$ 249,082.49	\$ 246,000.00	Balanced	98.8%	MWL, MIML
C368		61	A6		09/02/2023	\$ 468,824.00	Spirit Super	YES	23/02/2023	\$ 479,894.94	\$ 470,296.00	Balanced	98.0%	MWL, MIML
C369		60	A5		07/03/2023	\$ 161,422.00	HESTA	YES	23/02/2023	\$ 151,422.00	\$ 138,672.90	Growth	91.6%	MWL, MIML
C370		42	A5		06/02/2023	\$ 394,958.00	Praemium	YES	02/03/2023	\$ 407,292.76	\$ 399,961.49	High Growth	98%	MWL, MIML, Q2T.0036.0
C371		39	A5		06/02/2023	\$ 194,159.00	Praemium, AMP Signature Super	YES	02/03/2023	\$ 187,175.84	\$ 183,057.97	High Growth	98%	MWL, MIML, Q2T.0036.0
C372		50	A5		13/02/2023	\$ 286,003.00	BUSSQ MySuper, Praemium	YES	02/03/2023	\$ 277,049.53	\$ 271,508.54	High Growth	98%	MWL, MIML, Q2T.0036.0
C373		52	A5		20/01/2023	\$ 377,781.00	Australian Retirement Trust Super	YES	02/03/2023	\$ 380,837.90	\$ 374,140.33	High Growth	98.2%	MWL, MIML
C374		49	A2		01/02/2023	\$ 210,642.00	Macquarie/Australian Super/Hesta	YES	02/03/2023	\$ 181,375.77	\$ 175,000.00	High Growth	96.5%	MWL, MIML
C375		48	A6		01/02/2023	\$ 420,151.00	CFS FirstChoice Employer Super	YES	02/03/2023	\$ 435,586.26	\$ 429,052.00	High Growth	98.5%	MWL, MIML
C376		52	A2		09/02/2023	\$ 196,072.00	Macquarie/REI Super	YES	02/03/2023	\$ 198,800.00	\$ 192,000.00	Growth	96.6%	MWL, MIML
C377		52	A2		10/02/2023	\$ 188,269.00	Macquarie/AMP	YES	02/03/2023	\$ 131,708.79	\$ 126,000.00	High Growth	95.7%	MWL, MIML
C378		54	A2		13/02/2023	\$ 339,955.00	Macquarie/AMP/Australia n Super	YES	02/03/2023	\$ 339,250.32	\$ 334,000.00	Growth	98.5%	MWL, MIML
C379		51	A9		15/02/2023	\$ 328,232.00	Mercer	YES	02/03/2023	\$ 325,000.00	\$ 321,000.00	High Growth	98.8%	MWL, MIML
C380		56	A2		16/12/2022	\$ 252,131.00	Praemium/CFS	YES	09/03/2023	\$ 260,254.39	\$ 256,000.00	Growth	98%	MWL, MIML, Q2T.0036.0
C381		40	A2		10/02/2023	\$ 85,103.00	Praemium/Rest	YES	09/03/2023	\$ 84,708.88	\$ 81,000.00	High Growth	96%	MWL, MIML, Q2T.0036.0
C382		53	A4		16/11/2022	\$ 382,474.00	CBUS	YES	09/03/2023	\$ 372,474.00	\$ 367,000.00	Growth	98.5%	MWL, MIML
C383		52	A4		16/11/2022	\$ 275,576.00	CFS First Choice	YES	09/03/2023	\$ 265,576.00	\$ 261,000.00	Growth	98.3%	MWL, MIML
C384		52	A3		10/02/2023	\$ 88,613.00	QSuper	YES	09/03/2023	\$ 78,613.00	\$ 72,548.00	Growth	92.3%	MWL, MIML
C385		52	A3		10/02/2023	\$ 713,174.00	Plum Super	YES	09/03/2023	\$ 703,174.00	\$ 688,608.00	Growth	97.9%	MWL, MIML
C386		58	A2		13/02/2023	\$ 296,062.00	Macquarie/Rest	YES	09/03/2023	\$ 286,000.00	\$ 280,000.00	Growth	97.9%	MWL, MIML
C387		51	A9		15/02/2023	\$ 181,493.00	Asgard	YES	09/03/2023	\$ 172,000.00	\$ 169,000.00	High Growth	98.3%	MWL, MIML

C388		41	A1		17/02/2023	\$ 177,938.00	Macquarie super manager II	YES	09/03/2023	\$ 178,133.45	\$ 173,133.00	Growth	97.2%	MWL, MIML
C389		57	A9		21/02/2023	\$ 277,522.00	ESSSuper	YES	09/03/2023	\$ 198,000.00	\$ 196,000.00	Growth	99.0%	MWL, MIML
C390		59	A1		22/02/2023	\$ 160,236.00	Macquarie super manager II	YES	09/03/2023	\$ 160,708.10	\$ 153,708.00	Growth	95.6%	MWL, MIML
C391		44	A9		28/02/2023	\$ 174,652.00	Australian Super	YES	09/03/2023	\$ 165,000.00	\$ 162,000.00	High Growth	98.2%	MWL, MIML
C392		41	A3		23/09/2022	\$ 237,670.00	HESTA	YES	16/03/2023	\$ 220,000.00	\$ 215,345.00	Growth	97.9%	MWL, MIML
C393		45	A1		24/01/2023	\$ 125,000.00	Macquarie super manager II	YES	16/03/2023	\$ 126,000.00	\$ 121,000.00	High Growth	96.0%	MWL, MIML
C394		37	A8		01/02/2023	\$ 41,733.00	Hostplus	YES	16/03/2023	\$ 33,733.00	\$ 30,739.04	Growth	91.1%	MWL, MIML
C395		50	A2		10/02/2023	\$ 65,922.00	Macquarie/ART	YES	16/03/2023	\$ 66,889.15	\$ 62,000.00	High Growth	92.7%	MWL, MIML
C396		53	A9		16/02/2023	\$ 43,634.00	Australian Super	YES	16/03/2023	\$ 37,000.00	\$ 35,000.00	High Growth	94.6%	MWL, MIML
C397		55	A3		21/02/2023	\$ 122,740.00	AustralianSuper	YES	16/03/2023	\$ 112,740.00	\$ 106,140.00	High Growth	94.1%	MWL, MIML
C398		54	A8		23/02/2023	\$ 271,020.00	Aware	YES	16/03/2023	\$ 266,020.00	\$ 260,699.00	Growth	98.0%	MWL, MIML
C399		50	A8		23/02/2023	\$ 423,580.00	OnePath	YES	16/03/2023	\$ 403,393.21	\$ 395,325.35	Growth	98.0%	MWL, MIML
C400		45	A2		10/02/2023	\$ 129,381.00	Praemium/BT Super for life	YES	23/03/2023	\$ 129,703.00	\$ 127,000.00	High Growth	98%	MWL, MIML, Q2T.0036.0
C401		54	Terheci		16/02/2023	\$ 261,349.00	MLC MasterKey Business Super	YES	23/03/2023	\$ 254,000.00	\$ 252,000.00	High Growth	99%	MWL, MIML, Q2T.0036.0
C402		46	A1		24/01/2023	\$ 79,126.00	Macquarie super manager II	YES	23/03/2023	\$ 80,676.49	\$ 76,676.00	Growth	95.0%	MWL, MIML
C403		53	A1		13/02/2023	\$ 277,976.00	Macquarie super manager II	YES	23/03/2023	\$ 283,224.89	\$ 277,992.00	Growth	98.2%	MWL, MIML
C404		51	A2		02/03/2023	\$ 136,002.00	Macquarie/Aus Super	YES	23/03/2023	\$ 129,500.00	\$ 125,000.00	High Growth	96.5%	MWL, MIML
C405		39	A3		15/03/2023	\$ 139,560.00	Aware Super	YES	23/03/2023	\$ 129,560.00	\$ 124,000.00	Growth	95.7%	MWL, MIML
C406		49	A5		16/02/2023	\$ 158,385.00	Praemium	YES	30/03/2023	\$ 157,479.93	\$ 152,755.53	High Growth	97%	MWL, MIML, Q2T.0036.0
C407		54	A3		13/10/2021	\$ 108,463.00	ANZ Smart Choice	YES	30/03/2023	\$ 81,329.50	\$ 31,409.80	Conservative, Growth	38.6%	MWL, MIML
C408		53	A9		22/02/2023	\$ 271,675.00	HESTA, YourChoice	YES	30/03/2023	\$ 264,375.20	\$ 261,375.00	Growth	98.9%	MWL, MIML
C409		52	A5		23/02/2023	\$ 486,167.00	Australian Super	YES	30/03/2023	\$ 476,167.00	\$ 465,641.81	Growth	97.8%	MWL, MIML
C410		49	A9		16/03/2023	\$ 118,322.00	CFS	YES	30/03/2023	\$ 116,864.83	\$ 114,864.83	High Growth	98.3%	MWL, MIML
C411		50	A9		16/03/2023	\$ 96,404.00	CFS	YES	30/03/2023	\$ 97,333.13	\$ 95,333.00	High Growth	97.9%	MWL, MIML
C412		58	A5		06/02/2023	\$ 451,597.00	Qsuper, Praemium	YES	06/04/2023	\$ 434,490.80	\$ 426,669.97	High Growth	98%	MWL, MIML, Q2T.0036.0
C413		45	A5		15/02/2023	\$ 81,240.00	Australiansuper, Praemium	YES	06/04/2023	\$ 70,305.41	\$ 68,055.64	High Growth	97%	MWL, MIML, Q2T.0036.0
C414		44	A5		15/02/2023	\$ 178,663.00	CFS FirstChoice Employer Super, Praemium	YES	06/04/2023	\$ 171,873.99	\$ 168,092.76	High Growth	98%	MWL, MIML, Q2T.0036.0
C415		42	A5		16/02/2023	\$ 137,194.00	CareSuper, Praemium	YES	06/04/2023	\$ 129,127.72	\$ 125,899.53	High Growth	98%	MWL, MIML, Q2T.0036.0

C416		53	A2		09/05/2022	\$ 365,901.00	Praemium	YES	06/04/2023	\$ 323,614.17	\$ 319,000.00	Growth	99%	MWL, MIML, Q2T.0036.0
C417		53	A5		16/11/2022	\$ 407,765.00	Generations Personal Super	YES	06/04/2023	\$ 431,070.94	\$ 417,168.81	High Growth	96.8%	MWL, MIML
C418		43	A8		20/02/2023	\$ 177,057.00	Australian Super	YES	06/04/2023	\$ 167,057.00	\$ 163,213.35	High Growth	97.7%	MWL, MIML
C419		51	A2		20/03/2023	\$ 206,039.00	Macquarie/AMP	YES	06/04/2023	\$ 197,000.00	\$ 192,000.00	Growth	97.5%	MWL, MIML
C420		58	A5		22/02/2023	\$ 151,997.00	Praemium, SunSuper	YES	13/04/2023	\$ 143,707.77	\$ 140,115.08	High Growth	98%	MWL, MIML, Q2T.0036.0005.5929
C421		41	A3		23/09/2022	\$ 177,863.00	Active Super	YES	13/04/2023	\$ 189,696.31	\$ 185,146.00	Growth	97.6%	MWL, MIML
C422		45	A6		27/01/2023	\$ 185,988.00	Cbus	YES	13/04/2023	\$ 193,524.31	\$ 189,653.82	High Growth	98.0%	MWL, MIML
C423		50	A6		10/02/2023	\$ 101,082.00	VicSuper	YES	13/04/2023	\$ 91,900.00	\$ 88,683.50	High Growth	96.5%	MWL, MIML
C424		53	A8		20/02/2023	\$ 410,296.00	Australian Super	YES	13/04/2023	\$ 400,296.00	\$ 392,290.00	High Growth	98.0%	MWL, MIML
C425		64	A9		21/03/2023	\$ 88,880.00	AMP	YES	13/04/2023	\$ 89,125.62	\$ 68,612.85	Conservative, Growth	77.0%	MWL, MIML
C426		53	A6		10/02/2023	\$ 222,096.00	MLC MasterKey Business Super	YES	20/04/2023	\$ 211,300.00	\$ 207,074.00	High Growth	98.0%	MWL, MIML
C427		40	A9		27/03/2023	\$ 283,279.00	QSuper	YES	20/04/2023	\$ 280,000.00	\$ 278,000.00	Growth	99.3%	MWL, MIML
C428		43	A9		27/03/2023	\$ 290,737.00	QSuper	YES	20/04/2023	\$ 288,000.00	\$ 286,000.00	Growth	99.3%	MWL, MIML
C429		54	A9		29/03/2023	\$ 205,605.00	Aware Super	YES	20/04/2023	\$ 196,000.00	\$ 194,000.00	High Growth	99.0%	MWL, MIML
C430		54	A9		31/03/2023	\$ 207,666.00	CFS	YES	20/04/2023	\$ 200,000.00	\$ 198,000.00	Growth	99.0%	MWL, MIML
C431		55	A9		31/03/2023	\$ 139,626.00	Mercer	YES	20/04/2023	\$ 136,000.00	\$ 134,000.00	High Growth	98.5%	MWL, MIML
C432		43	A1		31/03/2023	\$ 169,563.00	Macquarie super manager II	YES	20/04/2023	\$ 154,871.00	\$ 151,871.00	Balanced	98.1%	MWL, MIML
C433		55	A2		31/03/2023	\$ 187,875.00	Macquarie/Aus Ethical Super	YES	20/04/2023	\$ 181,796.00	\$ 178,000.00	Growth	97.9%	MWL, MIML
C434		46	A2		31/03/2023	\$ 96,234.00	Macquarie/Prime Super	YES	20/04/2023	\$ 90,500.00	\$ 86,000.00	Growth	95.0%	MWL, MIML
C435		53	A9		13/04/2023	\$ 321,622.00	HESTA	YES	20/04/2023	\$ 320,000.00	\$ 317,000.00	Growth	99.1%	MWL, MIML
C436		51	A6		20/01/2023	\$ 202,491.00	ART	YES	27/04/2023	\$ 210,902.62	\$ 208,793.59	Growth	99.0%	MWL, MIML
C437		58	A8		23/01/2023	\$ 248,859.00	MyNorth	YES	27/04/2023	\$ 240,859.00	\$ 236,042.00	Balanced	98.0%	MWL, MIML
C438		46	A9		14/03/2023	\$ 39,198.00	CBUS	YES	27/04/2023	\$ 32,000.00	\$ 30,000.00	High Growth	93.8%	MWL, MIML
C439		55	A8		20/03/2023	\$ 217,113.00	AMP Super Fund & Cbus	YES	27/04/2023	\$ 211,550.92	\$ 207,319.90	Growth	98.0%	MWL, MIML
C440		53	A9		28/03/2023	\$ 253,993.00	AMP, Vision	YES	27/04/2023	\$ 250,006.60	\$ 247,006.00	High Growth	98.8%	MWL, MIML
C441		55	A9		28/03/2023	\$ 30,226.00	ESSuper Super	YES	27/04/2023	\$ 24,045.00	\$ 23,045.00	High Growth	95.8%	MWL, Q2T.0035.0001.4656 MIML
C442		59	A3		29/11/2022	\$ 91,981.00	CBUS	YES	04/05/2023	\$ 81,981.00	\$ 74,031.00	Growth	90.3%	MWL, MIML

C443		59	A3		29/11/2022	\$ 120,115.00	Guild Retirement Fund	YES	04/05/2023	\$ 110,115.00	\$ 104,297.00	Growth	94.7%	MWL, MIML
C444		45	A9		08/03/2023	\$ 129,325.00	Australian Super	YES	04/05/2023	\$ 120,000.00	\$ 118,000.00	High Growth	98.3%	MWL, MIML
C445		45	A9		08/03/2023	\$ 94,385.00	Mercer	YES	04/05/2023	\$ 87,000.00	\$ 85,000.00	Growth	97.7%	MWL, MIML
C446		45	A9		14/03/2023	\$ 213,761.00	CBUS	YES	04/05/2023	\$ 204,000.00	\$ 202,000.00	High Growth	99.0%	MWL, MIML
C447		58	A9		21/03/2023	\$ 352,442.00	HESTA	YES	04/05/2023	\$ 340,000.00	\$ 338,000.00	Growth	99.4%	MWL, MIML
C448		40	A2		28/03/2023	\$ 364,555.00	Macquarie/ART	YES	04/05/2023	\$ 360,000.00	\$ 355,000.00	High Growth	98.6%	MWL, MIML
C449		60	A2		21/03/2023	\$ 72,851.00	Macquarie Super Manager II and Onepath	YES	11/05/2023	\$ 74,143.15	\$ 69,000.00	High Growth	93.1%	MWL, MIML
C450		57	A2		21/03/2023	\$ 148,605.00	Macquarie Super Manager II/Onepath	YES	11/05/2023	\$ 154,369.80	\$ 150,000.00	High Growth	97.2%	MWL, MIML
C451		55	A9		05/04/2023	\$ 225,072.00	ING	YES	11/05/2023	\$ 225,623.00	\$ 222,623.00	High Growth	98.7%	MWL, MIML
C452		46	A2		13/04/2023	\$ 174,043.00	Macquarie/PSS	YES	11/05/2023	\$ 188,000.00	\$ 184,000.00	Growth	97.9%	MWL, MIML
C453		32	A6		19/04/2023	\$ 128,114.00	Hostplus	YES	11/05/2023	\$ 123,570.00	\$ 120,480.75	High Growth	97.5%	MWL, MIML
C454		37	A6		06/02/2023	\$ 115,967.00	BT Super	YES	18/05/2023	\$ 117,942.52	\$ 115,964.67	Growth	98.3%	MWL, MIML
C455		47	A9		13/04/2023	\$ 187,097.00	Mercer	YES	18/05/2023	\$ 172,000.00	\$ 169,000.00	High Growth	98.3%	MWL, MIML
C456		57	A6		28/10/2022	\$ 213,158.00	MLC MasterKey Super Fundamentals	YES	25/05/2023	\$ 227,722.09	\$ 223,167.60	Balanced	98.0%	MWL, MIML
C457		56	A5		28/03/2023	\$ 223,482.00	CBUS	YES	25/05/2023	\$ 213,482.00	\$ 207,262.16	High Growth	97.1%	MWL, MIML
C458		56	A1		12/05/2022	\$ 224,796.00	Macquarie super manager II	YES	01/06/2023	\$ 214,795.00	\$ 209,795.00	Growth	97.7%	MWL, MIML
C459		56	A1		16/03/2023	\$ 349,210.00	Macquarie super manager II	YES	01/06/2023	\$ 357,335.00	\$ 353,000.00	Growth	98.8%	MWL, MIML
C460		56	A5		08/05/2023	\$ 328,147.00	Prime Super	YES	01/06/2023	\$ 318,147.00	\$ 310,466.17	Growth	97.6%	MWL, MIML
C461		40	A6		10/05/2023	\$ 244,053.00	AMP SignatureSuper	YES	01/06/2023	\$ 247,438.85	\$ 244,964.46	Balanced	99.0%	MWL, MIML
C462		55	A2		11/05/2023	\$ 96,206.00	Macquarie/AMP	YES	01/06/2023	\$ 96,445.23	\$ 91,000.00	High Growth	94.4%	MWL, MIML
C463		54	A1		15/05/2023	\$ 136,495.00	Macquarie super manager II	YES	01/06/2023	\$ 138,729.16	\$ 135,729.00	High Growth	97.8%	MWL, MIML
C464		61	A5		19/05/2023	\$ 652,283.00	Plum Super	YES	01/06/2023	\$ 470,051.01	\$ 421,804.05	Balanced	89.7%	MWL, MIML
C465		46	A5		23/05/2023	\$ 46,511.00	REST Super	YES	01/06/2023	\$ 36,511.00	\$ 33,740.20	High Growth	92.4%	MWL, MIML
C466		46	A5		23/05/2023	\$ 108,903.00	CBUS	YES	01/06/2023	\$ 98,903.00	\$ 94,970.76	High Growth	96.0%	MWL, MIML
C467		64	A2		19/06/2023	\$ 435,475.00	Challenger lifetime annuity/Aware Super	NO	N/A	N/A	N/A	N/A	N/A	MWL
C468		61 & 65	A2		19/06/2023	\$ 1,045,000.00	MWL Active Strategy & Term Annuity 12 months	NO	N/A	N/A	N/A	N/A	N/A	MWL
C469		57	A8		18/07/2023	\$ 338,999.00	PSS Accumulation	YES	10/08/2023	\$ 349,587.22	\$ 253,783.48	Balanced	72.6%	MWL, EQS

C470		42	A8		24/07/2023	\$ 254,779.00	BussQ & Cbus	YES	14/08/2023	\$ 238,779.00	\$ 232,201.81	Conservative, Balanced, Growth	97.2%	MWL, EQS
C471		58	A8		12/07/2023	\$ 388,051.00	Aware Super & Prime Super	YES	18/08/2023	\$ 329,681.72	\$ 332,506.02	Balanced, Growth	>100%	MWL, EQS
C472		50	A3		18/07/2023	\$ 192,108.00	Australian Super & SmartMonday Prime	YES	18/08/2023	\$ 102,587.00	\$ 98,877.37	Growth, High Growth	96.4%	MWL, EQS
C473		53	A8		26/07/2023	\$ 155,542.00	MyNorth	YES	18/08/2023	\$ 163,582.35	\$ 158,588.45	Growth, High Growth	96.9%	MWL, EQS
C474		52	A5		01/08/2023	\$ 435,940.00	Aware Super	YES	18/08/2023	\$ 425,940.00	\$ 317,916.85	High Growth	74.6%	MWL, EQS
C475		50	A8		02/08/2023	\$ 244,460.00	Aware	YES	18/08/2023	\$ 236,460.00	\$ 229,931.64	Conservative, Balanced, Growth	97.2%	MWL, EQS
C476		51	A5		22/08/2023	\$ 346,512.00	AIA Super Select	NO	N/A	N/A	N/A	N/A	N/A	MWL
C477		44	A9		18/07/2023	\$ 122,997.00	HostPlus	YES	24/08/2023	\$ 126,018.07	\$ 93,212.01	High Growth	74.0%	MWL, EQS
C478		42	A5		03/08/2023	\$ 146,018.00	Spirit Super	YES	24/08/2023	\$ 136,018.00	\$ 100,687.08	High Growth	74.0%	MWL, EQS
C479		46	A4		13/07/2023	\$ 85,299.00	Rest Super	YES	31/08/2023	\$ 75,299.00	\$ 72,890.72	Conservative, Balanced, Growth	96.8%	MWL, EQS
C480		45	A4		13/07/2023	\$ 138,700.00	Rest Super	YES	31/08/2023	\$ 128,700.00	\$ 125,179.42	Conservative, Balanced, Growth	97.3%	MWL, EQS
C481		44	A3		18/07/2023	\$ 163,034.00	Care Super	YES	31/08/2023	\$ 153,034.00	\$ 148,227.14	Growth, High Growth	96.9%	MWL, EQS
C482		45	A5		26/07/2023	\$ 212,521.00	REST Personal Super	YES	31/08/2023	\$ 202,521.00	\$ 150,513.56	High Growth	74.3%	MWL, EQS
C483		55	A9		27/07/2023	\$ 206,812.00	Aware	YES	31/08/2023	\$ 198,000.00	\$ 176,536.87	Balanced, Growth	89.2%	MWL, EQS
C484		40	A5		31/07/2023	\$ 126,125.00	netwealth Super Accelerator (Plus), Qsuper	YES	31/08/2023	\$ 8,600.00	\$ 86,989.29	High Growth	>100%	MWL, EQS
C485		55	A5		31/07/2023	\$ 330,343.00	QSuper	YES	31/08/2023	\$ 318,343.00	\$ 237,233.01	Growth	74.5%	MWL, EQS
C486		55	A8		04/08/2023	\$ 165,707.00	Australian Retirement Trust & Hostplus	YES	31/08/2023	\$ 117,258.00	\$ 113,205.22	Balanced, Growth	96.5%	MWL, EQS
C487		49	A9		09/08/2023	\$ 228,109.00	TWU Super	YES	31/08/2023	\$ 215,000.00	\$ 191,820.05	Balanced, Growth	89.2%	MWL, EQS
C488		50	A5		11/08/2023	\$ 126,022.00	QSuper	YES	31/08/2023	\$ 115,022.00	\$ 84,961.49	High Growth	73.9%	MWL, EQS
C489		39	A8		14/07/2023	\$ 206,441.00	AustralianSuper	YES	04/09/2023	\$ 183,533.23	\$ 172,672.32	Conservative, Balanced	94.1%	MWL, EQS
C490		46	A9		04/08/2023	\$ 202,954.00	Aware, Qsuper	YES	04/09/2023	\$ 17,341.99	\$ 153,507.68	High Growth	>100%	MWL, EQS
C491		50	A9		08/08/2023	\$ 150,022.00	Australian Super, Mercer	YES	04/09/2023	\$ 142,953.93	\$ 105,903.44	High Growth	74.1%	MWL, EQS
C492		45	A9		14/08/2023	\$ 147,848.00	Aware	YES	04/09/2023	\$ 136,000.00	\$ 100,692.29	High Growth	74.0%	MWL, EQS
C493		44	A3		18/05/2023	\$ 62,199.00	MLC Wrap Super	YES	05/09/2023	\$ 51,451.54	\$ 50,368.21	Growth, High Growth	97.9%	MWL, EQS

C494		53	A3		07/08/2023	\$ 115,105.00	MLC Wrap Super	YES	05/09/2023	\$ 100,977.16	\$ 113,963.85	Growth, High Growth	>100%	MWL, EQS
C495		44	A4		21/06/2023	\$ 234,600.00	CBUS	NO	N/A	N/A	N/A	N/A	N/A	MWL
C496		56	A1		05/07/2023	\$ 178,109.00	NQ Super, HUB24 Super	YES	12/09/2023	\$ 179,140.17	\$ 173,813.38	Conservative,	97%	MWL, EQS, Q2T.0036.00
C497		51	A1		22/06/2023	\$ 297,067.00	Spirit Super	YES	21/09/2023	\$ 306,607.07	\$ 288,802.51	Conservative,	94%	MWL, EQS, Q2T.0036.00
C498		44	A3		07/08/2023	\$ 105,349.00	BT Panorama Super	YES	21/09/2023	\$ 106,677.72	\$ 104,431.59	Growth, High Growth	97.9%	MWL, EQS
C499		47	A5		11/08/2023	\$ 321,175.00	AustralianSuper	YES	21/09/2023	\$ 311,175.00	\$ 231,932.95	Growth	74.5%	MWL, EQS
C500		48	A3		18/07/2023	\$ 224,108.00	HUB24 Super Choice	YES	26/09/2023	\$ 214,108.00	\$ 209,599.89	Growth, High Growth	97.9%	MWL, EQS
C501		50	A9		03/08/2023	\$ 122,321.00	REST	YES	26/09/2023	\$ 113,000.00	\$ 100,147.81	Balanced, Growth	88.6%	MWL, EQS
C502		35	A5		08/08/2023	\$ 142,838.00	Mercer Super Trust	YES	26/09/2023	\$ 144,376.70	\$ 106,950.94	High Growth	74.1%	MWL, EQS
C503		53	A9		23/08/2023	\$ 132,053.00	Australian Super	YES	26/09/2023	\$ 123,000.00	\$ 91,543.44	High Growth	74.4%	MWL, EQS
C504		52	A9		23/08/2023	\$ 177,514.00	AMP	NO	N/A	N/A	N/A	N/A	N/A	MWL
C505		56	A3		29/08/2023	\$ 388,815.00	BT Panorama	YES	26/09/2023	\$ 368,815.00	\$ 359,499.86	Conservative, Balanced, Growth	97.5%	MWL, EQS
C506		51	A3		04/09/2023	\$ 513,189.00	CBUS Super	YES	26/09/2023	\$ 517,702.92	\$ 505,252.90	Growth, High Growth	97.6%	MWL, EQS
C507		53	A2		11/09/2023	\$ 768,066.00	New Quantum/Q Super	YES	26/09/2023	\$ 763,000.00	\$ 570,447.84	Growth	74.8%	MWL, EQS
C508		43	A5		03/08/2023	\$ 128,200.00	ANZ Smart Choice Super	YES	27/09/2023	\$ 118,200.00	\$ 87,334.60	High Growth	73.9%	MWL, EQS
C509		48	A3		07/09/2023	\$ 242,754.00	Mercer Super Trust, NQ Super	YES	09/10/2023	\$ 232,754.00	\$ 227,078.48	Growth, High Growth	98%	MQL, EQS, Q2T.0021.00
C510		50	A3		07/09/2023	\$ 60,000.00	Rest	YES	16/10/2023	\$ 50,833.00	\$ 48,987.89	Growth, High Growth	96.4%	MWL, EQS
C511		59	A4		21/06/2023	\$ 548,300.00	Mercer Super	NO	N/A	N/A	N/A	N/A	N/A	MWL
C512		51	A3		06/09/2023	\$ 330,000.00	AMP Signature Super	YES	23/11/2023	\$ 319,883.00	\$ 311,598.14	Growth, High Growth	97.4%	MWL, EQS
C513		53	A3		12/09/2023	\$ 255,000.00	Hostplus	YES	23/11/2023	\$ 246,611.00	\$ 239,868.90	Growth, High Growth	97.3%	MWL, EQS
C514		50	A9		23/08/2023	\$ 258,255.00	Australian Super; Macquarie Super Manager II	Yes	23/11/2023	\$ 242,141.95	\$ 181,486.74	High Growth	75.0%	MWL, Q2T.0036.0004.0921, EQS
C515		47	A3		13/09/2023	\$ 168,458.00	Mercer Super Trust, NQ Super	YES	23/11/2023	\$ 158,458.00	\$ 153,572.00	Growth High Growth	97%	MWL, EQS, Q2T.0021.00
C516		50	A9		23/03/2023	\$ 214,449.00	Aware	YES	27/11/2023	\$ 236,670.68	\$ 177,308.76	High Growth	74.9%	MWL, EQS
C517		45	A5		11/09/2023	\$ 289,361.00	Hostplus Super	YES	27/11/2023	\$ 274,915.04	\$ 205,462.67	High Growth	74.7%	MWL, EQS
C518		43	A5		11/09/2023	\$ 292,691.00	Aware Super	YES	27/11/2023	\$ 282,691.00	\$ 211,297.59	High Growth	74.7%	MWL, EQS
C519		51	A5		14/09/2023	\$ 163,352.00	HESTA	YES	27/11/2023	\$ 153,352.00	\$ 113,516.36	High Growth	74.0%	MWL, EQS

C520		52	A8		21/09/2023	\$ 411,731.00	Hub 24 Super	YES	29/11/2023	\$ 380,000.00	\$ 281,409.65	Balanced	74.1%	MWL, EQS
C521		42	A8		22/09/2023	\$ 148,511.00	MyNorth	YES	29/11/2023	\$ 140,506.00	\$ 104,164.48	Growth	74.1%	MWL, EQS
C522		39	A8		22/09/2023	\$ 132,337.00	AMP SignatureSuper	YES	29/11/2023	\$ 124,337.00	\$ 91,600.81	Growth	73.7%	MWL, EQS
C523		47	A3		25/09/2023	\$ 156,990.00	CBUS	YES	29/11/2023	\$ 144,990.00	\$ 107,447.53	Growth	74.1%	MWL, EQS
C524		58	A1		27/09/2023	\$ 277,574.00	DASH Super	YES	29/11/2023	\$ 259,197.00	\$ 193,907.92	Growth	74.8%	MWL, EQS
C525		50	A7		16/10/2023	\$ 67,657.00	CFS FirstChoice Employer Super	YES	29/11/2023	\$ 59,657.00	\$ 43,923.86	Growth	73.6%	MWL, EQS
C526		49	A7		16/10/2023	\$ 217,787.00	CFS FirstChoice Employer Super	YES	29/11/2023	\$ 209,787.00	\$ 156,525.10	Growth	74.6%	MWL, EQS
C527		58	A2		23/10/2023	\$ 219,911.00	DASH and MLC	YES	29/11/2023	\$ 175,157.86	\$ 163,035.95	High Growth	93.1%	MWL, EQS
C528		44	A8		30/10/2023	\$ 195,949.00	MLC Masterkey Super Fundamentals	YES	29/11/2023	\$ 187,949.00	\$ 139,313.94	High Growth	74.1%	MWL, EQS
C529		42	A7		07/11/2023	\$ 130,904.00	GESB Super	YES	29/11/2023	\$ 125,904.00	\$ 92,790.38	High Growth	73.7%	MWL, EQS
C530		48	A7		07/11/2014	\$ 122,916.00	Hostplus	YES	30/11/2023	\$ 114,916.00	\$ 86,187.00	High Growth	75.0%	MWL, EQS
C531		57	A7		05/10/2023	\$ 331,167.00	CSC Public Sector Superannuation Accumulation Plan	YES	30/11/2023	\$ 324,000.00	\$ 241,728.19	Growth	74.6%	MWL, EQS
C532		57	A7		03/11/2023	\$ 553,870.00	Australian Super	YES	30/11/2023	\$ 545,870.00	\$ 408,117.99	Growth	74.8%	MWL, EQS
C533		42	A2		09/11/2023	\$ 161,000.00	DASH and MLC/PreviousMLC	YES	30/11/2023	\$ 154,000.00	\$ 115,500.00	High Growth	75.0%	MWL, EQS
C534		45	A1		14/11/2023	\$ 126,101.00	Australian Super	YES	30/11/2023	\$ 129,446.38	\$ 97,084.79	High Growth	75.0%	MWL, EQS
C535		54	A1		14/11/2023	\$ 408,943.00	Australian Super	YES	30/11/2023	\$ 398,943.00	\$ 299,207.25	High Growth	75.0%	MWL, EQS
C536		54	A9		23/03/2023	\$ 305,563.00	CBUS	YES	01/12/2023	\$ 321,091.08	\$ 240,558.99	High Growth	74.9%	MWL, EQS
C537		39	A8		23/10/2023	\$ 206,227.00	AustralianSuper	YES	05/12/2023	\$ 198,227.00	\$ 148,670.25	High Growth	75.0%	MWL, EQS
C538		50	A8		09/11/2023	\$ 199,222.00	CFS	YES	05/12/2023	\$ 191,222.00	\$ 143,416.50	Balanced	75.0%	MWL, EQS
C539		43	A4		13/11/2023	\$ 168,656.00	Australian Super	YES	05/12/2023	\$ 161,000.00	\$ 115,920.00	Balanced	72.0%	MWL, EQS
C540		48	A2		20/11/2023	\$ 199,145.00	DASH/Previous AMP	YES	06/12/2023	\$ 6,781.49	\$ 147,211.12	High Growth	>100%	MWL, EQS
C541		60	A8		08/11/2023	\$ 407,822.00	Mercer	YES	15/12/2023	\$ 419,002.55	\$ 314,251.91	Growth	75.0%	MWL, EQS
C542		38	A1		20/11/2023	\$ 140,220.00	Qsuper/DASH super	YES	15/12/2023	\$ 130,220.00	\$ 97,665.00	Growth	75.0%	MWL, EQS
C543		46	A7		02/11/2024	\$ 173,506.00	Hostplus	YES	15/12/2023	\$ 173,000.00	\$ 129,750.00	High Growth	75.0%	MWL, EQS
C544		53	A3		-	-	Macquarie Super Manager II	YES	15/12/2023	\$ 202,057.63	\$ 151,543.22	Growth	75.0%	MWL, EQS
C545		62	A8		02/11/2023	\$ 181,662.00	MyNorth, AMIST Super & AustralianSuper	YES	18/12/2023	\$ 167,907.98	\$ 125,930.99	Balanced	75.0%	MWL, EQS
C546		43	A8		23/11/2023	\$ 173,029.00	MyNorth	YES	18/12/2023	\$ 177,892.06	\$ 124,524.44	Growth, High Growth	70.0%	MWL, EQS

C547		42	A4		04/12/2023	\$ 169,916.00	CBUS Super	YES	21/12/2023	\$ 170,500.00	\$ 122,760.00	Growth	72.0%	MWL, EQS
C548		46	A7		04/12/2023	\$ 156,763.00	BT Panorama	YES	27/12/2023	\$ 152,000.00	\$ 114,000.00	High Growth	75.0%	MWL, EQS
C549		52	A7		05/12/2023	\$ 269,295.00	IOOF	YES	27/12/2023	\$ 264,295.00	\$ 198,221.25	Growth	75.0%	MWL, EQS
C550		50	A7		29/11/2014	\$ 368,201.00	Australian Super	YES	27/12/2023	\$ 362,202.00	\$ 271,651.50	High Growth	75.0%	MWL, EQS
C551		41	A8		13/11/2023	\$ 158,731.00	Hostplus	YES	29/12/2023	\$ 150,731.00	\$ 113,048.25	Balanced	75.0%	MWL, EQS
C552		55	A2		30/11/2023	\$ 412,230.00	DASH and Aus Super/Aus Super	YES	29/12/2023	\$ 419,762.60	\$ 314,821.95	Growth	75.0%	MWL, EQS
C553		57	A2		05/12/2023	\$ 413,158.00	DASH and Q Super/previous Q Super	YES	29/12/2023	\$ 413,000.00	\$ 308,257.50	High Growth	74.6%	MWL, EQS
C554		39	A1		06/12/2023	\$ 281,260.00	CFS First Choice Super	YES	11/01/2024	\$ 271,260.00	\$ 203,443.16	Growth	75.0%	MWL, EQS
C555		54	A5		07/12/2023	\$ 292,519.00	BUSSQ	YES	12/01/2024	\$ 292,519.00	\$ 219,389.25	High Growth	75.0%	MWL, EQS
C556		37	A3		-	-	NQ Super	YES	15/01/2024	\$ 291,000.00	\$ 58,131.96	High Growth	20.0%	MWL, EQS
C557		55	A1		11/10/2023	\$ 426,764.00	Australian Super	YES	16/01/2024	\$ 445,469.76	\$ 332,609.82	High Growth	74.7%	MWL, EQS
C558		52	A7		14/11/2014	\$ 150,000.00	Russell Investment	YES	18/01/2024	\$ 152,000.00	\$ 114,000.00	Growth	75.0%	MWL, EQS
C559		45	A5		25/10/2023	\$ 195,766.00	REST	YES	19/01/2024	\$ 185,766.00	\$ 139,323.13	High Growth	75.0%	MWL, EQS
C560		68	A5		01/12/2023	\$ 395,579.00	ANZ Smart Choice Employer Super, AustralianSuper, CBUS, Mercer Super Trust	NO	N/A	N/A	N/A	N/A	N/A	MWL
C561		56	A2		20/11/2023	\$ 171,000.00	DASH and CBUS	YES	29/01/2024	\$ 167,000.00	\$ 123,757.50	High Growth	74.1%	MWL, EQS
C562		56	A4		13/11/2023	\$ 167,158.00	Spirit Super and Q Super	NO	N/A	N/A	N/A		N/A	MWL
C563		50	A4		13/11/2023	\$ 115,961.00	Spirit Super	NO	N/A	N/A	N/A		N/A	MWL
C564		50	A1		16/01/2024	\$ 240,636.00	Australian Super	YES	01/02/2024	\$ 230,636.00	\$ 172,977.00	High Growth	75.0%	MWL, EQS
C565		43	A7		13/12/2023	\$ 126,249.00	Mine Super	YES	02/02/2024	\$ 131,289.73	\$ 98,553.26	High Growth	75.1%	MWL, EQS
C566		40	A7		12/01/2024	\$ 132,276.00	AMP	YES	02/02/2024	\$ 127,276.00	\$ 95,475.52	High Growth	75.0%	MWL, EQS

Item	Total
Total number of clients	566
Total super balance before SOA	\$ 131,636,191.76
Total number of clients invested in Shield	556
Total initial rollover amount	\$ 120,808,288.51
Total value of initial Shield investment	\$ 114,129,837.89