

Vanguard Ethically Conscious International Shares Index Fund

This Product Disclosure Statement (**PDS**) is issued by Vanguard Investments Australia Ltd ABN 72 072 881 086 AFSL 227263 (Vanguard, we, us or our), and is a summary of significant information relating to the unhedged class of the Vanguard Ethically Conscious International Shares Index Fund (Fund) ARSN 626 133 275 ABN 89 276 633 202 APIR® Code VAN8175AU. Vanguard is the responsible entity of the Fund.

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This PDS is a summary of significant information you need to make a decision about the Fund. It includes references to other important information in the Vanguard Wholesale Funds Reference Guide (**Reference Guide**) that is taken to form part of this PDS. These references begin with an exclamation mark **!** and are in *italics*. You should also consider the Reference Guide and other important information incorporated in this PDS before making your decision about the Fund.

The information provided in this PDS is general information only and does not take into account your personal financial situation or needs. You should obtain financial advice that is tailored to your personal circumstances from a licensed financial adviser.

Eligible investors

Please note that as at the date of this PDS, the [Vanguard Wholesale Funds / Investor Funds] will no longer be accepting applications directly from individual and SMSF investors. Individual and SMSF investors can still access the Funds indirectly (for example, through Vanguard Personal Investor, a master trust, wrap platform or a nominee or custody service) or by application from a financial adviser. For investors investing indirectly, this PDS [and Reference Guide] should be used for information purposes only. We may change the types of investors eligible to make direct applications by notice on our website. To find out if you are eligible to invest in a Fund directly or if you would like further information regarding Vanguard Personal Investor, please visit www.vanguard.com.au/personal or contact us.

Information in this PDS is current as at its issue date and may change from time to time. Where the changes are not materially adverse to investors, the information may be updated on the Vanguard website at www.vanguard.com.au. A paper copy of any updated information is available free of charge on request.

All dollar amounts are in Australian dollars unless otherwise indicated. This PDS does not constitute an offer or invitation in any jurisdiction other than in Australia or New Zealand or to anyone whom it would not be lawful to make such an offer. Applications from outside Australia or New Zealand will not be accepted through this PDS. For the avoidance of doubt, units in the Fund are not intended to be sold to US Persons as defined under Regulation S of the US federal securities laws.

! WARNING TO NEW ZEALAND INVESTORS

Some of the content contained in this PDS will not apply to New Zealand investors.

None of The Vanguard Group, Inc. (including Vanguard Investments Australia Ltd) nor any of their related entities, directors or officers guarantee the repayment of capital or the performance of the Fund. Vanguard or any of its related entities or associates may invest in, lend to or provide services to the Fund. Vanguard may also invest, lend to, or provide services to funds or accounts owned or managed by its related entities or perform services for clients who have appointed Vanguard as investment manager. The allocation of aggregated investments amongst various funds and accounts will be conducted by Vanguard and its related entities in accordance with appropriate policies and procedures to manage any conflicts of interest.

If you would like to request a printed copy of this PDS or any of the other important information that forms part of this PDS, please contact us on 1300 655 102.

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1. About Vanguard Investments Australia Ltd

Vanguard Investments Australia Ltd ("Vanguard") is a wholly owned subsidiary of The Vanguard Group, Inc. The Vanguard Group, Inc. is one of the world's largest global investment management companies, with more than AUD \$8.6 trillion in assets under management as of 31 March 2020. In Australia, Vanguard has been serving financial advisers, retail clients and institutional investors for more than 20 years.

Vanguard is the responsible entity of the Fund. As responsible entity, Vanguard is solely responsible for the management and administration of the Fund. Vanguard is also the investment manager for the Fund and has appointed other entities within the Vanguard group of companies to provide investment management related services to the Fund. Investors will be notified of any future change in the investment manager of the Fund and this PDS will be updated accordingly.

Vanguard has appointed JP Morgan Chase Bank, N.A. (Sydney branch) (ABN 43 074 112 011) as custodian of the Fund.

ⓘ Further information relating to the custodian can be found in the reference guide. You should read the important information about the custodian in the Reference Guide before making a decision. Go to section "Other information" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to the custodian in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.

2. How the Vanguard Ethically Conscious International Shares Index Fund works

The Fund is a registered managed investment scheme. When you contribute money to a registered managed investment scheme, your money is pooled together with other people's money. Vanguard invests that money and manages the assets of the Fund on behalf of all scheme members. The Australian Securities & Investments Commission (ASIC) has a website www.moneysmart.gov.au that has more information about managed investment schemes.

The Fund is divided into units. As an investor, you acquire units in the Fund. A unit represents a beneficial interest in the assets of the Fund as a whole (but not to any particular asset). Under the Fund's constitution, Vanguard is permitted to establish different classes of units.

This PDS relates only to the unhedged class of units of the Fund.

Unit prices

The value of a unit is determined by dividing the net asset value attributable to the relevant class of units (total assets for that class less total liabilities for that class) by the number of units on issue in that class at the time of valuation.

Units are usually valued daily, except on public holidays, if the market is closed or the Fund is suspended. The value of units will change from time to time as the market value of the assets in the Fund rises or falls. The price you pay when contributing to the Fund (buying units) or receive when withdrawing from the Fund (selling units) is calculated as follows:

- Buy price = net asset value per unit plus the buy spread
- Sell price = net asset value per unit minus the sell spread

The buy/sell spread for the Fund is Vanguard's reasonable estimate of the transaction costs that the Fund may incur to buy and sell assets when investing contributions and funding withdrawals. The buy/sell spreads are paid to the Fund to meet these expenses and are not received by Vanguard. Please refer to section 6. "Fees and costs" for any buy/sell spreads applicable to the Fund.

Vanguard may also allocate transaction costs that the Fund incurs as a result of investing the contributions and funding the withdrawals of a particular class of units to that class, when determining the price of units of each class.

For information on unit prices visit our website or contact Client Services on 1300 655 102.

Applications and withdrawals

Investors can acquire wholesale class units by completing the relevant application process. Subject to the minimum requirements in the table below and other applicable terms and conditions, you can increase your investment at any time by buying more units or decrease your investment by withdrawing or transferring some of your units.

Initial investment	\$500,000 ^A
Additional investment	\$5,000
Withdrawal	\$1,000
Transfer	\$500,000 ^B
Account balance	Nil ^C

^A Vanguard may accept a lesser amount at its discretion.

^B Vanguard may allow you to transfer your units in the Fund to another person in Australia or New Zealand.

^C Vanguard may impose a minimum account balance in the future.

In most circumstances, Vanguard permits investments via BPAY[®].

Investors can request the withdrawal of all or part of their investment in the Fund by providing us with a withdrawal request. Withdrawals from the Fund are normally paid within three business days, however the constitution for the Fund allows withdrawal proceeds to be paid within a longer period. In some circumstances, Vanguard may freeze or suspend withdrawals and investors may not be able to withdraw their funds within the usual period upon request.

Fund distributions

Distributions may include income earned by the Fund or any other amounts that Vanguard considers appropriate for distribution. As at the date of this PDS, Vanguard intends for the distributions made by the Fund to be based on the taxable income earned by the Fund for each year. The income of the Fund will generally include income earned on holding and disposing of the assets of the Fund.

Where the Fund is an AMIT (see further "Taxation" section below), as distributions for each period may be based on estimates or exclude certain types of income, the amount distributed may differ to the income attributed to investors for tax purposes. Any income of the Fund that is not distributed for the period will either be held back for distribution in a later period in the same financial year, or accumulated in the Fund. Vanguard may from time to time, review its approach to distributions and elect to distribute on an alternative basis.

Distributions will generally be made on a quarterly basis, however Vanguard may elect to distribute at other times. Distributions will normally be paid within 10 business days following the end of the distribution period. The amount of distributions will vary from period to period and there may be periods in which no distribution is made. If this should occur, details will be available on our website.

Distributions are calculated on a per unit basis and will be paid to investors based on the number and class of units held as at the end of the distribution period.

You can choose to have your distributions:

- reinvested in additional units; or
- paid directly to a nominated Australian bank account.

If you do not make a choice, distributions will be automatically reinvested in additional units in the Fund. Where your distribution is reinvested, the units you receive will be issued to you without a buy spread being added to the price you pay for those units. Vanguard reserves the right to reinvest any distributions following the death of the investor even if the investor's representative requests the distributions to be credited to an Australian bank account.

You may change your choice for distribution payments by completing a Change of Details Form located on our website. To ensure that the change to your distribution payments is effective for an upcoming distribution period, you should submit a Change of Details Form to Vanguard at least 5 business days before the end of that distribution period.

! *You should read the important information about applications, withdrawals (including BPAY[®] and transfers) and unit pricing in the Reference Guide before making a decision. Go to sections "Applications", "Withdrawals" and "Unit pricing" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to applications, withdrawals and unit pricing in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.*

Indirect investors

You may invest in the Fund offered in this PDS indirectly (for example, through a master trust, wrap platform or a nominee or a custody service). If you invest in this manner certain information in this PDS may not be relevant to you such as: applications and withdrawals, Fund distributions, investor communication, fees and costs, how to open an account and cooling off rights. You should consult the offer document or client agreement through which you have invested.

New Zealand investors

New Zealand investors are offered units in the Fund on the basis of this PDS and may apply for units by submitting a Vanguard Wholesale Funds Application Form. There is some important information that New Zealand investors should consider before applying for units.

! *You should read the important information about New Zealand investors in the Reference Guide before making a decision. Go to section "New Zealand investors" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to New Zealand investors in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.*

3. Benefits of investing in the Vanguard Ethically Conscious International Shares Index Fund

The significant features and benefits of investing in the Fund include:

- **Competitive long-term performance** - Vanguard's investment approach provides investors with an efficient way to capture long-term market performance.
- **Diversification** - The Fund provides exposure to a diversified portfolio of securities, which means the Fund is less exposed to the performance fluctuations of individual securities. This moderates the volatility of the portfolio and 'smooths out' investment returns over time. The Fund provides exposure to a wide selection of available securities in the relevant index, generally holding significantly more securities than most active funds with the same benchmark. From time to time, however, the number of securities in a given index may reduce due to factors such as index rebalancing.
- **Tax efficiency** - Vanguard's buy and hold strategy means that securities are generally held within a portfolio over a long period of time. If certain securities are held for more than 12 months, any capital gain (if applicable) on the disposal of those securities may be reduced under the capital gains tax discount rules - a tax efficient outcome for eligible investors.
- **Low cost investing** - The Fund has low ongoing fees as we strive to minimise the costs of managing and operating the Fund. The Fund typically has low portfolio turnover resulting in low trading costs such as brokerage and other transaction costs.

The significant features and benefits of investing with Vanguard include:

- **Stability and experience** - The Vanguard Group, Inc. established the world's first index mutual fund for individual investors in 1976 and has been a leader in low cost index investing ever since. In Australia, Vanguard leverages the scale, experience and

resources of our established global business. Investing in the Fund allows you to access the knowledge and skill of Vanguard as a specialist investment manager.

- **Client focus** - The Vanguard Group, Inc. was founded on a simple but revolutionary idea - that an investment company should manage the funds it offers in the sole interest of its clients. From rigorous risk management to transparent pricing to plain talk communications, we put our clients' interest first.
- **Low costs** - Investors can't control the markets, but they can control the costs of investing. Providing low cost investments isn't a pricing strategy for us. It's how we do business. Vanguard's scale also helps to keep costs low.

4. Risks of managed investment schemes

All investments carry risk. It is important to keep in mind one of the principles of investing: the highest long-term returns may also carry the highest level of short-term risk. Different investment strategies carry different levels of risk, depending on the assets that make up the investment strategy.

It is important to understand that the value of the investments may go up and down, investment returns are not guaranteed and investors may lose some of their money. The level of returns may vary and future returns may differ from past returns. Laws affecting registered managed investment schemes may change in the future. The appropriate level of risk for each person depends on a range of factors, including age, investment time frame, where other parts of the investor's wealth are invested and the investor's risk tolerance.

Significant risks of investing in the Fund

There is no guarantee that the value of your initial investment will be maintained. In other words, the value of your investment may rise or fall. Significant investment risks include:

- **Market risk** - Market risk is the possibility that market returns will overall decline. Financial markets tend to move in cycles, with periods of rising prices and periods of falling prices. It is important to note that the value of your investment can be directly or indirectly impacted and that you may not get back what you invested in the Fund.
- **Index inaccuracy risk** - The index provider does not generally accept liability for the accuracy or completeness of the index data. There is a risk that the index provider makes errors in the construction of the index which may not be identified and corrected for a period of time. Vanguard does not provide a warranty or guarantee for index provider errors. Therefore, the gains, losses, or costs associated with the index provider's errors will be borne by the Fund and its unitholders.
- **Security specific risk** - The prices of securities the Fund invests in, either directly or indirectly (through a holding in another investment vehicle) can rise or fall independently of changes in the broad market. The Fund is generally well protected from security specific risk through diversifying its holdings across a wide selection of available securities in the index.
- **Currency risk** - There is the chance that the value of a foreign investment, measured in Australian dollars, will decrease because of unfavourable changes in currency exchange rates.
- **Derivative risk** - A derivative is a contract or financial product that derives its price from one or more underlying assets, reference rates or indexes. Derivatives are generally used as an instrument to gain market exposure or to hedge risk; however, they also create exposure to additional risks. These additional risks include the possibility that the value of the derivative may fail to move in line with the underlying asset, the potential lack of liquidity of the derivative, or that the parties to the derivative contract may not be able to meet their obligations. Derivative contracts are not used to leverage the assets of the Fund.
- **Counterparty risk** - The risk that the Fund may incur a loss due to the failure of a counterparty to meet their obligations under a contract. The Fund's counterparties may include brokers, clearing houses and other agents. In relation to securities lending, there is a risk that a borrower defaults on its obligations to return securities. This may in turn lead to collateral and liquidity risks if the value of the collateral and/or liquidity of the replacement securities decreases. Vanguard seeks to mitigate the risks of its securities lending program through strict credit monitoring and requiring the provision of highly liquid collateral. See "Securities Lending" in section 5 for more information.
- **Regulatory risk** - There is a risk that the Fund may be adversely impacted by a change in laws and regulations governing a security, sector or financial market, including in relation to tax. Regulatory risk may be higher when investing internationally due to the nature and actions of particular legal systems and/or regimes in effect.
- **Fund risk** - Managed funds, in simple terms, pool the money of many individual investors. Therefore, investing in a managed fund may give rise to different outcomes as compared to investing in the underlying securities directly. As an investor in the Fund, your investment returns may be impacted by the applications and withdrawals of other investors, the fees and costs imposed by the Fund manager and different tax outcomes related to the tax laws applicable to the Fund. In addition, there is a risk that Vanguard could be replaced as the responsible entity and/or investment manager for the Fund, or the Fund could terminate. As a fund with a multi-class structure, liabilities specific to each class are first satisfied out of the assets specific to that class. However, where the assets specific to that class are not sufficient to meet those liabilities, the Fund overall may be required to meet those liabilities.
- **Manager risk** - The Fund may fail to meet its investment objective due to Vanguard's (including where relevant, any related entities') investment selection or implementation processes which may cause the Fund to underperform its benchmark or other Funds with a similar investment strategy.
- **Operational risk** - There is a risk that Vanguard, or another service provider, will fail to adequately administer or report accurately in relation to the Fund or your investment in the Fund. There is also a risk that circumstances beyond Vanguard's control may prevent it from managing the Fund in accordance with its investment strategy. Such occurrences may include strikes, industrial disputes, fires, war, civil disturbance, terrorist acts, state emergencies and epidemics in Australia or in the countries where the underlying securities are held.

5. How we invest your money

Warning: When it comes to choosing to invest in the Fund, you should consider the likely investment return, the risk and your investment timeframe.

Investment strategy and investment return objective

The Fund seeks to track the return of the FTSE Developed ex Australia Choice Index (with net dividends reinvested) in Australian dollars before taking into account fees, expenses and tax.

The Fund aims to hold all of the securities in the index most of the time, allowing for individual security weightings to vary marginally from the index from time to time. The Fund may be exposed to securities that have been removed from or are expected to be included in the index. The Fund may also invest in futures contracts.

The FTSE Developed ex Australia Choice Index comprises securities (shares) listed on the exchanges of the world's major developed economies. The index excludes companies with significant business activities involving fossil fuels, nuclear power, alcohol, tobacco, gambling, weapons, adult entertainment and a conduct related screen based on severe controversies. Details of the benchmark methodology can be accessed by visiting <https://www.ftse.com/products/indices/global-choice>

The Fund may engage in securities lending. Securities lending is a common practice where holders of securities make short term loans of shares in return for a fee, to incrementally increase returns to investors.

Strategic asset allocation*	International shares 100%
Minimum suggested investment timeframe	Seven years.
Summary risk level	High – The potential for higher returns than lower risk investments, however there is the higher potential for below average returns and/or some loss of capital.
Who it may suit	Investors with Australian dollars, seeking exposure to a diversified portfolio of international shares with an ethically conscious screen.

*This is a targeted strategic asset allocation. In addition, cash or cash-equivalent instruments may be held (directly or through investing in a Vanguard fund) for the purposes of liquidity management and derivatives may be used to manage market exposure.

! *You should read the important information about how we invest your money (including in relation to the use of derivatives, securities lending and cash management of the Fund) in the Reference Guide before making a decision. Go to section "How Vanguard invests" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to how we invest your money in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.*

Environmental, social, and ethical considerations

Vanguard does not take into account labour standards, environment, social or ethical considerations when selecting, retaining or realising investments in the Fund to track the performance of the benchmark index. Vanguard has engaged FTSE to provide an index of securities for the Fund that excludes companies with significant business activities involving fossil fuels, nuclear power, alcohol, tobacco, gambling, weapons, adult entertainment and a conduct related screen based on severe controversies

The Vanguard Group, Inc. has established a formal procedure for identifying and monitoring portfolio companies, for example, whose direct involvement in crimes against humanity or patterns of egregious abuses of human rights would warrant engagement or potential divestment.

The Vanguard Group, Inc. is also a signatory to the Principles for Responsible Investment (PRI).

Changing the investment strategy

Vanguard may from time to time vary the investment strategy of the Fund, including by changing the target benchmark for the Fund. Vanguard will notify investors of any such changes.

6. Fees and costs

Did you know? Small differences in both investment performance and fees and costs can have a substantial impact on your long term returns. For example, total annual fees and costs of 2% of your investment balance rather than 1% could reduce your final return by up to 20% over a 30 year period (for example, reduce it from \$100,000 to \$80,000). You should consider whether features, such as superior investment performance or the provision of better member services, justify higher fees and costs. You may be able to negotiate to pay lower contribution fees and management costs where applicable. Ask the Fund or your financial adviser.

To find out more: If you would like to find out more, or see the impact of the fees based on your own circumstances, the **Australian Securities and Investments Commission (ASIC)** website (www.moneysmart.gov.au) has a managed funds fee calculator to help you compare different fee options.

Our fees and costs

The following table shows the fees and other costs you may be charged. This information can be used to compare costs between different simple managed investment schemes. These fees and costs may be deducted from your account balance, from the returns on your investment or from the Fund assets as a whole.

Taxes are set out in section 7 of this PDS.

You should read all the information about fees and costs because it is important to understand their impact on your investment.

Type of fee or cost	Amount	
Fees when your money moves in or out of the Fund		
Establishment fee	Nil	
Contribution fee	Nil	
Withdrawal fee	Nil	
Exit fee	Nil	
Management costs		
The fees and costs for managing your investment	Vanguard's management fee	0.20% p.a.*
	Indirect costs	0.00% p.a.**

*The amount of this fee may be negotiated.

**Indirect costs are based on an estimate as at the date of this PDS and may vary over time. Vanguard may update indirect cost information on its website where the overall change to the management cost is not materially adverse to investors.

Buy/sell spreads apply to the Fund. As at the date of this PDS, a buy spread of 0.07% is charged on each contribution and a sell spread of 0.07% is charged on each withdrawal. This amount is reflected in the buy price and sell price respectively for units in the Fund and is not separately charged to the investor.

Vanguard may vary the buy/sell spreads from time to time, including increasing these costs without notice when it is necessary to protect the interests of existing investors and if permitted by law. The updated information will be disclosed on our website.

The management fee for the Fund incorporates Goods and Services Tax (GST) after taking into account any expected input tax credits. Vanguard may change fees or introduce fees without your consent if permitted by the constitution for the Fund. At least 30 days prior notice will be given to unitholders before any management fee increase.

Additional explanation of fees and costs

Example of annual fees and costs

The following table provides an example of how the fees and costs for the Fund can affect your investment over a one year period. You should use this table to compare this Fund with other simple managed investment schemes.

Example - Vanguard Ethically Conscious International Shares Index Fund		Balance of \$500,000 with a contribution of \$5,000 during year
Contribution fees	Nil	For every additional \$5,000 you put in, you will be charged \$0.
PLUS management costs comprising:	0.20% p.a.	And , for every \$500,000 you have in the Fund you will be charged \$1,000 each year.
Vanguard's management fee: 0.20% p.a.		
Indirect costs: 0.00% p.a.		
EQUALS cost of Fund	If you had an investment of \$500,000 at the beginning of the year and you put in \$5,000 during that year you will be charged fees of \$1,000 ^{AB} . What it costs you will depend on the fees you negotiate with Vanguard.	

^A Assumes that the \$5,000 contribution occurs on the last day of the year and that there is a constant account balance of \$500,000 throughout the year. Additional fees may apply.

^B A buy spread of 0.07% would also apply. For every \$5,000 you put in, you will be charged \$3.50.

If you consult a financial adviser, you may have to pay additional fees to the adviser. Please refer to your Statement of Advice for details of these fees (if any).

Management costs

Management costs are made up of Vanguard's management fee that is deducted from the returns of the Fund and may include indirect costs.

The management fee is Vanguard's remuneration for managing and overseeing the operations of the Fund. Any expenses that Vanguard may recover from the Fund are paid out of this management fee and are not an additional cost deducted from the assets of the Fund. The amount of this fee can be negotiated. Where the Fund invests in an underlying Vanguard fund which is managed by Vanguard, Vanguard's management fee in the underlying fund is fully rebated back to the Fund and so does not need to be counted in indirect costs for the Fund.

Indirect costs refers to the fees and other management costs (if any) arising from underlying funds and the costs of certain over-the-counter derivatives. Indirect costs are not an additional fee paid to Vanguard. The indirect costs are based on an estimate as at the date of this PDS and may vary over time. Vanguard may update indirect cost information on its website where the overall change to the management cost is not materially adverse to investors.

Vanguard has a managed funds fee calculator on our website that can be used to calculate the impact of fees and costs on your account balance. The Australian Securities & Investments Commission (ASIC) also has a managed funds fee calculator on their website at www.moneysmart.gov.au that can be used to calculate the impact of fees and costs on your account balance.

! You should read the important information about fees and costs in the Reference Guide and transaction and operational costs in the Vanguard Transactional and Operational Costs Guide before making a decision. Go to section "Fees and costs" of the Reference Guide and the Vanguard Transactional and Operational Costs Guide located at

www.vanguard.com.au/offerdocuments. The material relating to fees and costs in the Reference Guide and the Vanguard Transactional and Operational Costs Guide may change between the time when you read this PDS and the day when you acquire the product.

7. How managed investment schemes are taxed

Warning: Investing in a registered managed investment scheme is likely to have tax consequences. You are strongly advised to seek professional tax advice.

Registered investment schemes generally do not pay tax on behalf of members. However, Vanguard may be required to withhold tax from each distribution at the relevant withholding tax rates under certain circumstances. You are assessed for tax on any income and capital gains generated by the registered managed investment scheme to which you are entitled.

The information below is a brief summary of the taxation information relating to Australian tax residents who hold their fund units on capital account for income tax purposes. It assumes that the Fund qualifies as and elects to be an Attribution Managed Investment Trust (AMIT). Please refer to the website for the current taxation status of the Fund.

As an AMIT, Vanguard will seek to attribute all of the taxable income of the Fund to investors each financial year. It is possible for investors to be attributed taxable income without receiving equivalent amounts of cash distributions. In this case, investors may be entitled to an increase in the tax cost base of their units. An AMIT also provides for different classes of units in a trust to be treated as separate trusts for the purposes of attributing taxable income to investors. Vanguard intends to make this election in respect of the Fund.

Investors may be liable to pay tax on capital gains realised on the sale of units in the Fund, either by withdrawal or transfer. There may also be a distribution and/or attribution of taxable income associated with a withdrawal from the Fund in certain circumstances, such as where the size of the withdrawal exceeds a certain threshold.

Should the Fund not qualify as an AMIT at any time in a financial year, then Vanguard expects to pay cash distributions based on the Fund's taxable income. In this case, investors will be assessed for tax on their share of the net taxable income of the Fund (both income and capital gains generated by the Fund) in the year to which their entitlement relates, irrespective of whether the income is reinvested in additional units or the income payment occurs at a later date.

! You should read the important information about taxation in the Reference Guide before making a decision. Go to section "Taxation" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to taxation in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.

8. How to apply

To invest in the Fund:

1. Read this PDS.
2. Read the important information referenced in the Reference Guide and Transaction and Operational Costs Guide.
3. Complete the applicable Vanguard Wholesale Funds Application Form. We need to collect this information in order to process your application, including to comply with Anti-Money Laundering and Counter-Terrorism Financing legislation.
4. Read and sign the declaration in the Application Form.
5. Attach your supporting identification documents, including any power of attorney authorisations.
6. Lodge your Application Form together with your supporting identification documents. We recommend that you keep copies for future reference.

For more information about the process to apply, please refer to the Reference Guide and the Application Form itself.

Vanguard may, in its absolute discretion, accept or refuse to accept, in whole or in part, any application or subscription for units. Vanguard need not give any reason for refusal. If for any reason Vanguard refuses or is unable to process your application to invest in the Fund, Vanguard will, subject to any legal and regulatory requirements, return your application money to you. You will not be entitled to interest on your application money in this circumstance. Vanguard is unable to process your application until all required information and/or supporting documentation is received.

Cooling off

If you invest \$500,000 or more in the Fund, you will generally be considered a wholesale investor. Wholesale investors, as defined in the *Corporations Act 2001 (Cth)*, do not have cooling off rights in relation to making an investment in the Fund.

However, if we exercise our discretion to accept an investment of less than \$500,000 in the Fund, you may have the same cooling off rights as a retail investor. Retail investors have the right to a 14 day cooling off period during which time you may request in writing that Vanguard repay your investment. The 14 day period commences either from the time the investment is confirmed by Vanguard or 5 business days after the units are issued, whichever is the earlier. The amount repaid to you under the cooling off provisions may be less than the amount you invested. The amount repaid will be based on the sell price applicable for the day the request is received, and may be reduced by tax or duty paid or payable by you in relation to the acquisition and termination of the investment.

The right to cool off may not apply if you invest indirectly (for example, through a master trust, wrap platform or a nominee or a custody service), even if you are a Retail investor. Indirect investors should seek advice from their platform operator or consult the relevant platform guide or similar type document as to whether cooling off rights apply.

! You should read the important information about applications in the Reference Guide before making a decision. Go to section "Applications" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to applications in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.

Complaints

If you have a complaint about the Fund or the services provided to you by Vanguard, please contact Client Services on 1300 655 102 from 8:00am to 6:00pm AEDT/AEST, Monday to Friday.

If your complaint is not resolved to your satisfaction, you can refer the matter in writing to:
Client Services Manager, Vanguard Investments Australia Ltd, GPO Box 3006, Melbourne, Vic, 3001.

Vanguard will try to resolve your complaint and get back to you as soon as possible, but in any event we will provide a final response within 45 days of receipt.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, (AFCA). AFCA provides a fair and independent financial services complaint resolution service that is free to consumers. You can contact AFCA on 1800 931 678 (free call) or email on info@afca.org.au.

9. Other Information

Investor communication

You can obtain up-to-date information about the Fund by visiting the Vanguard website. As an investor in the Fund, we'll keep you updated with any material information regarding your investment. For information that is sent directly to you, email is Vanguard's preferred means of sending you this information. Please ensure that you provide us with your email address on the Application Form.

Where the Fund is a disclosing entity, it will be subject to regular reporting and disclosure obligations and we will meet our continuous disclosure obligations by disclosing new material information on the Vanguard website in accordance with ASIC's good practice guidance. Copies of documents lodged with ASIC in relation to the Fund may be obtained from or inspected at an ASIC office. Vanguard can also provide you with a copy (free of charge) of the Annual Financial Report most recently lodged with ASIC, any half-yearly fund financial reports lodged with ASIC and any continuous disclosure notices given for the Fund after the lodgement of an annual report.

! *You should read the important information about investor communication in the Reference Guide before making a decision. Go to section "Investor communication" of the Reference Guide located at www.vanguard.com.au/offerdocuments. The material relating to investor communication in the Reference Guide may change between the time when you read this PDS and the day when you acquire the product.*

Privacy policy

Vanguard is committed to respecting the privacy of your personal information.

To obtain a copy of our privacy policy or to access or update your personal information, visit our website or contact Client Services on 1300 655 102 or write to GPO Box 3006, Melbourne, Vic, 3001.

Consent to statements in this PDS

FTSE has given its written consent to all statements by it or to be based on statements by it in the form and context in which they are included in this PDS, and has not withdrawn its consent as at the date of this PDS.

FTSE disclaimer

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