

Cromwell Phoenix Opportunities Fund

Distribution Components for Non-Resident Withholding Tax Purposes

Distribution for The Quarter Ended 31 December 2018

Following are the components of the Cromwell Phoenix Opportunities Fund distribution for the quarter ended 31 December 2018. The distribution payment is expected to be made on 11 January 2019 to unitholders who held Cromwell Phoenix Opportunities Fund units.

| Components | Cents per unit |
|---|----------------|
| Capital Gains (Australian Taxable Property) - Discounted (Grossed Up) | 0.00017 |
| Capital Gains (Australian Taxable Property) - Non-Discount | 0.00000 |
| Other Australian taxable income | 0.00000 |
| Fund payment | 0.00017 |
| Interest income | 0.02020 |
| Unfranked dividend income | 0.01265 |
| Amounts not subject to withholding taxes | 3.60073 |
| Total distribution | 3.63375 |

This distribution includes a 'Fund Payment' of 0.00017 cents per unit pursuant to Subdivision 12-H of Schedule 1 of the Taxation Administration Act 1953 ('the Act'), in respect of the income year ended 30 June 2019. The components of the distribution are provided solely for the purposes of determining managed investment trust ('MIT') non-resident withholding tax under Subdivisions 12-H and Division 12A of the Act.

The Cromwell Phoenix Opportunities Fund is a withholding managed investment trust for the purposes of Subdivision 12-H of the Act. Cromwell Funds Management Limited, as the responsible entity has made a choice for Cromwell Phoenix Opportunities Fund to be an attribution MIT from the year ended 30 June 2018.

The components are estimates only and should not be used for any other purpose. In particular, Australian resident unitholders should not rely on this notice for the purposes of completing income tax returns. Details of the full year components of distributions will be provided in the 2019 Attribution MIT Member Annual ('AMMA') Statement.