



Pool Providers Disclosure Guide (PPDG) – Plum Grove Harvest Pool

Plum Grove is a privately owned, WA based grain accumulation and export business, which connects Australian growers to some of Australia's biggest wheat customers, our shareholders. Plum Grove founded as a pooling and advisory company for growers, and today pooling remains a core part of the business. When a grower commits grain to a Plum Grove pool the trading strategy, mandate and benchmark is completely transparent. This level of transparency sets us apart from most pool managers in the marketplace. Once in the pool, growers receive regular updates on sales progress, EPRs and market conditions, which avoids any surprises on finalisation.

Pool Provider	Plum Grove Pty Ltd
Pool Product Name	Plum Grove Harvest Pool
Legal Entity Operating the Pool	Plum Grove Pty Ltd and CBH Grain Pty Ltd
Years this legal entity has run pools	14 years
Legal Entity owning the pooled grain	CBH Grain Pty Ltd
Name of responsible Pool Manager	Tyson Fry
Pool Manager's years of relevant experience	4 years





Pool Objective	The objective of the Plum Grove Harvest Pool is to provide participants with longer term international market exposure, while using commodity, derivatives and foreign exchange strategies that protect and enhance returns over the life of the pool.
Period open for deliveries/contracts	14th November 2017 – TBA
Length of Pool	14 months
Area where pool is offered	Western Australia – All port zones
Commodities/ Grades accepted	All standard wheat grades accepted
Hedging Tools used	The Plum Grove Harvest Pool uses physical sales and derivatives (futures, option and FX) to manage the percentage sold over the life of the pool.
Payment Options	Advance, Distributions, Harvest Loan, Flexi Loan and Deferred. Refer to Appendix 1 for more information.
Fees charged by the pool manager	A Management fee of 2% applies to the Plum Grove Harvest Pool (FOB), of which 1.25% will be paid to Plum Grove as a Pool Management Fee, and 0.75% will be paid to CBH for administrative costs. Additional operational fees are deducted, as per the General Terms and Conditions.
Pool Mandate	The Plum Grove Harvest Pool mandates determine the upper and lower hedge limits for the pool at any given point in time. This product uses physical sales and derivatives (futures, options and FX) to manage the percentage sold over the life of the pool. Refer to Appendix 2 for more information.
When will the audit be completed?	An independent audit of the Plum Grove Harvest Pool will be completed prior to final payments being made.

Will the pool be offered according to the GTA operating standard for pool providers?	Yes	All pools offered by Plum Grove will adhere to the GTA Technical Guideline Document (TGD) No. 4 – Operating Standards for Pool Providers. Plum Grove are in support of the recent changes to this document, as they seek to enhance the transparency and quality of pool products available to the Australian grain grower.
Does the pool provide participants with an Estimated Pool Return (EPR*)?	Yes	The EPR is quoted at a Free in Store (FIS) basis, net of management fees and costs. Live Returns are available on the Plum Grove website. Regular market updates are provided, while all participants will receive a finalisation report at product completion.
Does the pool provide participants with an Estimated Silo Return (ESR*)?	No	All returns are quoted at a Free in Store (FIS) basis
Does the pool provide participants with a Final Pool Return (FPR*)?	Yes	Final returns are quoted at a Free in Store (FIS) basis, net of management fees and costs.
Does the pool provide participants with a Final Silo Return (FSR*)?	No	Final returns are quoted at a Free in Store (FIS) basis
Does the pool provide a Guaranteed Pool Return (GPR*)?	No	The Plum Grove Harvest Pool does not provide a guaranteed minimum pool return.
Does the Pool provide an Underwritten pool Return (UPR*)?	No	The Plum Grove Harvest Pool does not offer underwriting.
Is there a potential for conflict between the pool manager and related entities?	Yes	As well as operating pools on behalf of growers, Plum Grove Pty Ltd also trades its own balance sheet. This gives rise to potential conflicts of interest. To address this, all pools managed by Plum Grove are ring fenced and managed independently of all other trading activities with separate bulk handler accounts and individual bank accounts. Plum Grove Pty Ltd has strict internal controls and policies which are governed by the Plum Grove Board.



Are the pool assets owned in a separate entity from the pool manager's assets?	No	When a grower nominates grain to the Plum Grove Harvest Pool, title of the stock transfers to CBH Grain Pty Ltd, a wholly owned subsidiary of CBH Group. CBH Grain Pty Ltd is the custodian of these tonnes, and subsequent equity, until such time as final equity is returned to the grower. See above for comments on how we segregate pool assets from other business activities.
Are the pool activities conducted separately from the pool manager's activities.	Yes	Yes. All Plum Grove Harvest Pool activities are ring fenced and managed independently of all other trading activities.

Appendix 1

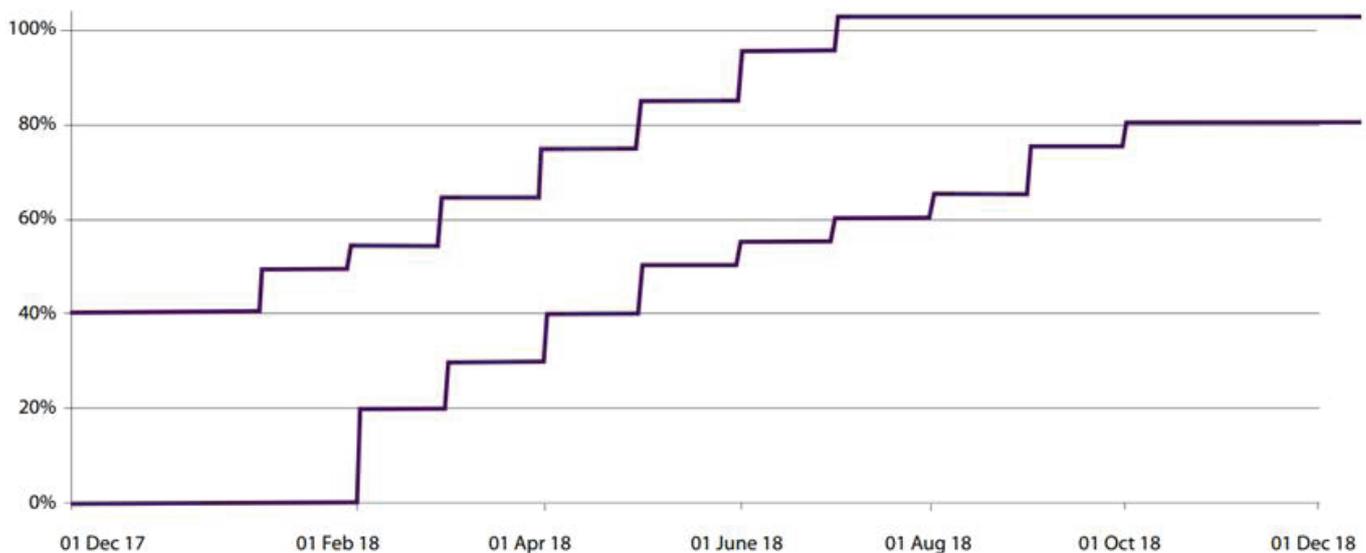
Payment	Harvest	Apr-18	Jul-18	Oct-18	Finalisation
Distributions		40%	40%	10%	10%
Harvest / Flexi Loan	80%				20%
Harvest Advance	75%		15%		10%
Deferred			80%		20%

Each payment will be less proportional costs. ** 7 days end of week (Sunday)

Appendix 2

Plum Grove Harvest Pool

These mandates determine the upper and lower hedge limits for the pool at any given point in time. This product uses physical sales and derivatives (futures, options and FX) to manage the percentage sold over the life of the pool.





DEFINED TERMS	
Estimated Pool Return (EPR)	Means an estimate of the Pool Return in \$/t exclusive of GST provided by the Pool Provider to Pool Participants. The EPR must also be quoted at Track or track equivalent level for East Coast and SA or FIS for WA and net of all costs, management fees, any other fees (including estimates of any costs and fees) where possible, otherwise explicitly define what costs, fees and charges are included and excluded in the published figure.
Estimated Silo Return (ESR)	Means an Estimated Pool Return quoted at up country silo level. It shall be the EPR (ie quoted at Track level on East Coast/SA, or FIS level in WA) less the applicable freight and any other costs for the respective silo.
Final Pool Return (FPR)	Means a final Pool Return in \$/t excl of GST provided by the Pool Provider to Pool Participants. The FPR must also be quoted at Track or track equivalent level for East Coast and SA or FIS for WA and net of all costs, management fees, any other fees (including estimates of any costs and fees) where possible, otherwise explicitly define what costs, fees and charges are included and excluded in the published figure.
Final Silo Return (FSR)	Means a Final Pool Return quoted at up country silo level. It shall be the FPR (ie quoted at Track level on East Coast/SA, or FIS level in WA) less the applicable freight and any other costs for the respective silo.
Guaranteed Pool Return (GPR)	Means the guaranteed minimum payment (\$/t) (excl GST) the Pool Provider will pay Pool Participants net of all Pool Provider charges at a designated price basing point, i.e. country silo, track, free in store ("FIS") excl of GST. A GPR is in effect a guaranteed minimum FPR.
Underwritten Pool Return (UPR)	Means the guarantee by a Pool Provider that a payment or loan made to a Pool Participant, if nominated as "Underwritten", is non-recourse should the subsequent proceeds, of Final Pool Return from the Pool be less than the Underwritten amount. Consequently, the Pool Participant shall have no further debt or liability to the Pool Provider (or associated provider) with respect of the Underwritten amount and that the Pool Provider guarantees the FPR paid to the Pool Participant will not be less than the Underwritten return.
Ring Fencing of Assets	Means the activities undertaken by the Pool Provider to quarantine or separate pool participants net assets, and equity from the assets and liabilities of the Pool Provider for the purpose of protecting the Pool Participants net assets, and equity from any administration or liquidation proceedings or actions should the Pool Provider become insolvent or be subject to administration or liquidation proceedings
Ring Fencing of Activities	Means the clear identification of grain belonging to a Pool and the separation of Pool assets and liabilities from other Pools and that of the Pool Provider. The fiduciary responsibility should be prioritised to Pool Participants at all times.

Full definitions are available in the GTA Technical Guideline Document (TGD) No.4