

# Trading Shares in a Low Volume Market

## Shareholders Fact Sheet

### What is a Low Volume Market?

Community Bank Strathmore is operated by Strathmore Community Services Limited.

Strathmore Community Services Limited also operates a Special Market called a Low Volume Market (LVM), to facilitate the trading of its shares. Strathmore Community Services Limited does not hold a license to operate a financial market and is not subject to market obligations, in particular the obligation to ensure that the market is fair, transparent and orderly. The market is covered by an exemption under section 791C of the Corporations Act.

Strathmore Community Services Limited does not provide a settlement service for trading in the market – it is the responsibility of the parties to a transaction to arrange payment between themselves.

### How is the Trading Process Managed?

The diagram on the reverse of this fact sheet provides an overview of the transaction steps.

The company secretary of Strathmore Community Services Limited maintains a register of interested parties who wish to buy or sell shares in the company. This includes contact details, quantities and prices offered or sought by parties.

Where a new interest arises (as lodged via the company website), the company's corporate office adds this new interest to the register. If possible, the company will then provide counterparty information so the new buyer (or seller) can contact another registered party, negotiate and arrange for the purchase or sale to occur. The communication with the company corporate office generally occurs via email and post.

Strathmore Community Services Limited is prohibited from providing any kind of direct matching or pricing service.

### How do I Sell my Shares in a Low Volume Market?

If you wish to sell your shares, access the Strathmore Community Services Limited webpage via the following link: <https://www.bendigobank.com.au/branch/vic/community-bank-strathmore/lvm-shares/>

At the bottom of this webpage click on the button "ONLINE REGISTRATION FORM" to register your interest to sell. This begins the trading process noted above and you will be contacted by the corporate office with further information and counterparty details. As noted, all contact with counterparties and price negotiation must be handled independently of the company. However, the negotiated transaction is approved by the Board of Strathmore Community Services Limited prior to independent settlement.

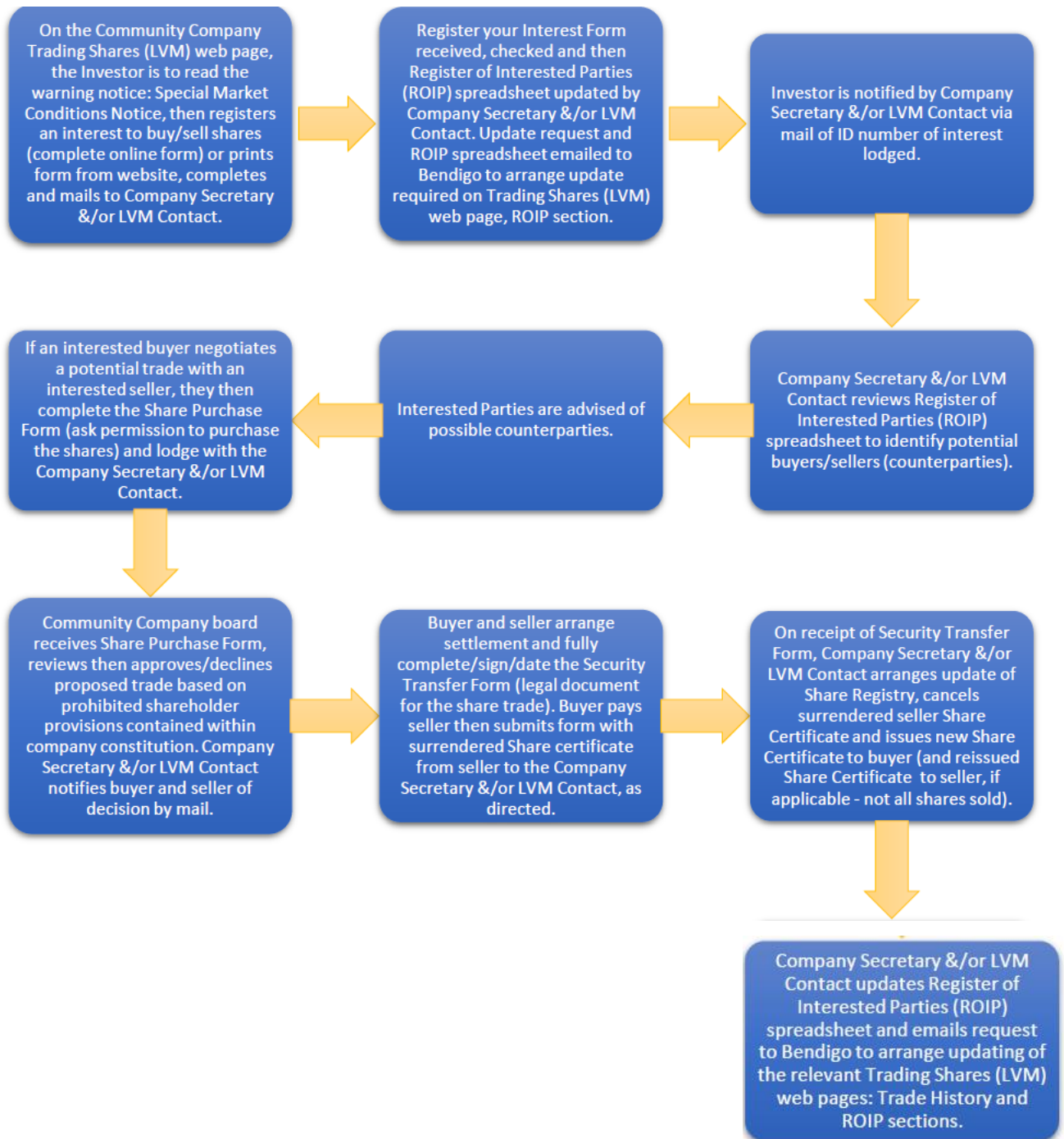
Once transaction details have been negotiated, both parties will together complete a Security Transfer Form and lodge personal identification with our share registry office (RSD Registry) to complete the legal steps needed for the share sale.

### Contacting Us

If you have any questions about the Low Volume Market or Trading Process, you can contact the company via:

The Company Secretary  
Strathmore Community Services Limited  
337 Napier Street  
Strathmore VIC 3041  
[admin@strathmore3041.com.au](mailto:admin@strathmore3041.com.au)

## The Low Volume Market Trading Process (10 Steps)



## Low Volume Market Procedure

### 10.3.8 Ensuring the Company is not Involved in the Matching of Parties or Pricing of Share Transfers

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It is clear from Corporations Law requirements and guidance provided by BEN that while a Community Bank company must facilitate the Low Volume Market, it CANNOT become involved in the following:

- Matching Buyer to Seller
- Choosing a Price for Sale
- Transferring funds for settlement

Notwithstanding the above, it has become apparent that some shareholders, due to health, age, lack of available technology or other reasons, are not able to conduct the details of the transaction themselves and request the assistance of the Community Company corporate office.

If possible, a party independent of the community company should be sought to conduct this assistance (e.g. shareholder relative, solicitor, BEN representative) but it is acknowledged that in some cases no such party is available.

In these cases, the assistance provided by the corporate office must be strictly limited to the following:

- Explaining the process
- Providing a hard copy extract from the LVM website of the current registered buyers or sellers and their offers, or the latest sales/pricing to assist the shareholder's decision making.
- Taking specific directions from the shareholder to assist them in completing the required forms e.g.:
  - Writing down what price they wish to sell for
  - Identifying which buyer(s) they wish to contact and in which order.

At all times the decisions MUST come from the shareholder and the corporate office must only act as an administrative support to complete the forms or explain/support each step of the process.

Any meetings between the corporate office and a shareholder where such directions are given must be recorded and ideally conducted with a third-party present (e.g. bank staff).