

**The 'BluePeak Fund' comprising;  
BluePeak Venture Capital Technology Trust ('the Trust')  
BluePeak VC Technology Pooled Fund Limited ('the Company')**

**Taxation Consequences for Unit holders and Shareholders of  
Share Distribution and Dividend**

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**Distribution of Shares in Company held by the Trust**

**Unit holders**

1. The Company shares acquired by the Unit holder as a result of the distribution in specie by the Trust will be deemed acquired by the Unit holder for their market value of \$0.3184 per share.
2. The cost base of the Unit holders existing units in the trust will not be reduced by the distribution of the shares.
3. No capital gain will be derived by Unit holders from the distribution.

**The Company pays a fully franked dividend to Shareholders from the Company's profits**

**Shareholders**

1. The dividend will be fully franked and have a franking credit attached.
2. The fully franked dividend will be exempt income of the shareholders.
3. A shareholder may elect to waive this exemption by including the amount of the dividend, grossed up by the imputation credit, in their assessable income and claim the corresponding imputation credit.

**The above is provided as a guide only. You should seek your own taxation advice in regard to these matters.**

Andrew Sneddon  
Taxation Consultant