

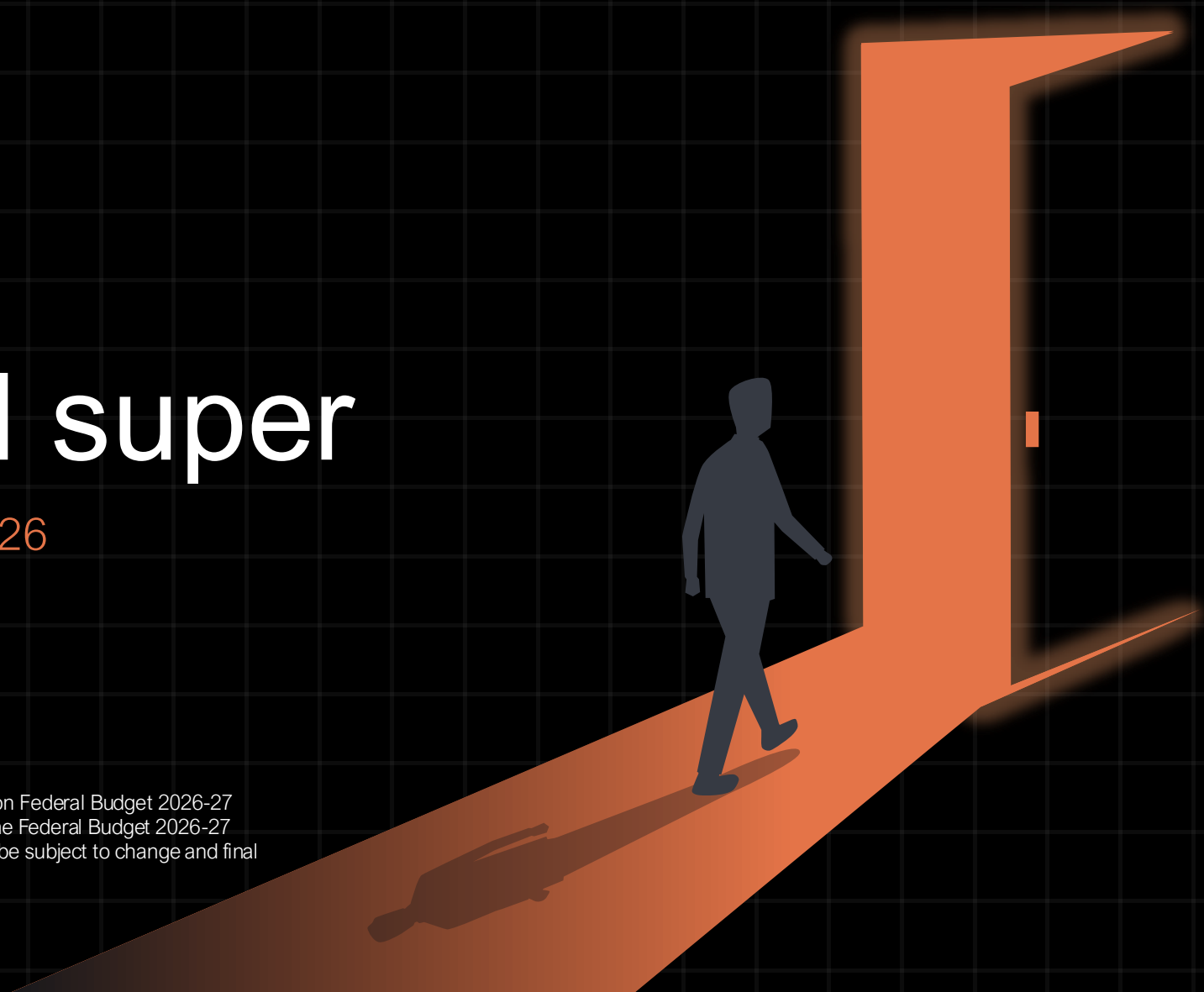


Beyond super

Lunch and Learn 2026

The information in this presentation is based on Federal Budget 2026-27 measures announced on 12 May 2026 and the Federal Budget 2026-27 fact sheets issued. The announcements may be subject to change and final legislation enacted.

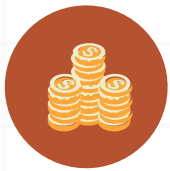
Outthinking today.



Discover Generation Life

Generation Life is the market leader and innovator in tax-aware investing, intergenerational wealth transfer, succession planning, and retirement income solutions.

As a wholly owned subsidiary of Generation Development Group, we are proud to be part of the Group that includes Lonsec Research and Ratings, and Evidentia Group.



>\$5.95b
in FUM¹



**#1 provider of
investment bond**
59% market share of annual
investment bond inflows²

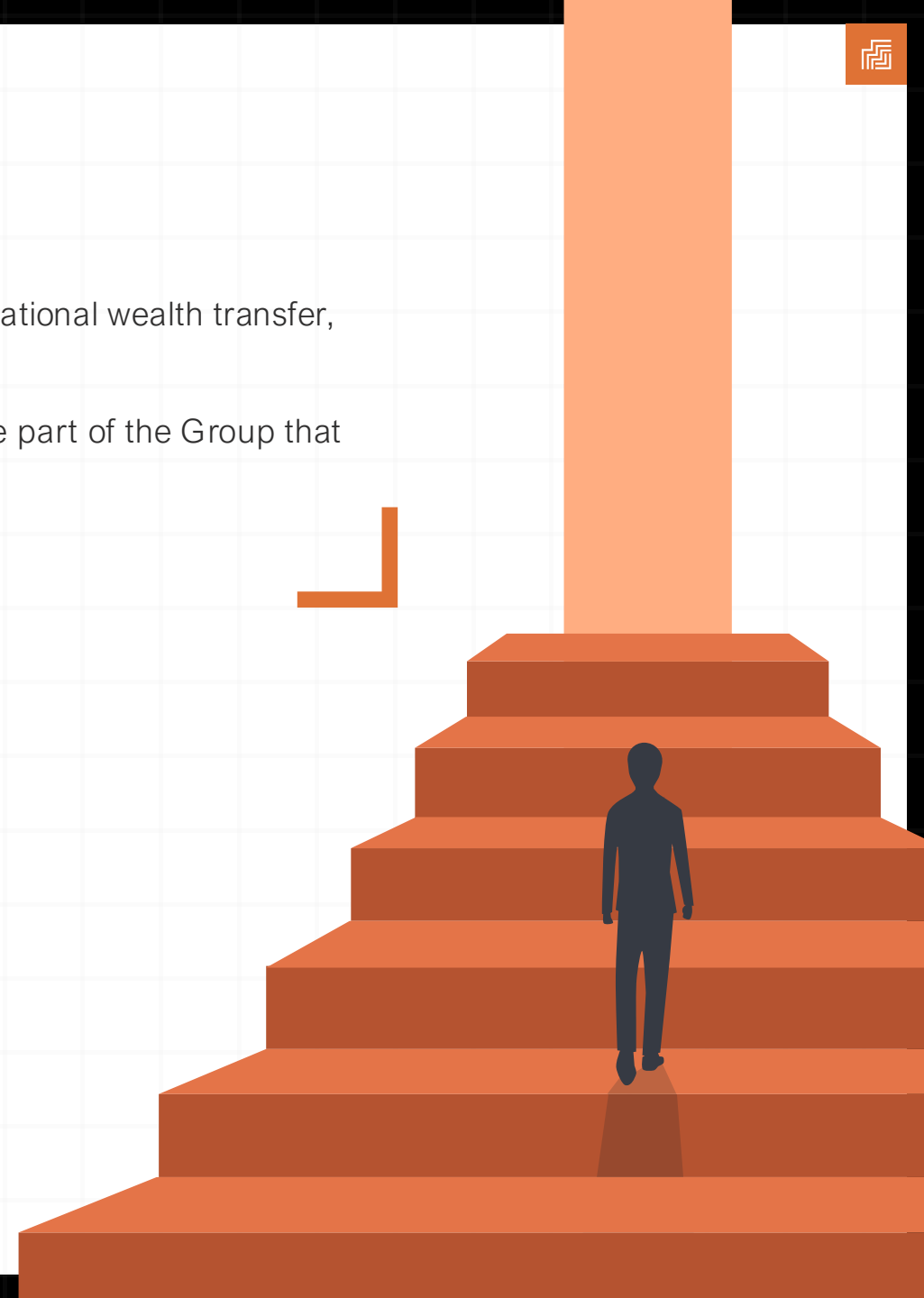


**Innovating
retirement landscape**
with estate planning and
lifetime income solutions



**Trusted and
APRA regulated**
Parent company
ASX 200 listed³

1. As at 30 June 2026
2. Plan for Life, Investment Bonds Market Report for period ended 31 March 2026.
3. ASX 200 inclusion on the 24th of April 2025.



Today's session...

01

Post Federal Budget update

Division 296, CGT changes, trust taxation and what's coming next

02

What does this mean for your clients?

Planning frameworks, investment behaviour and how to have the conversation

03

Case studies

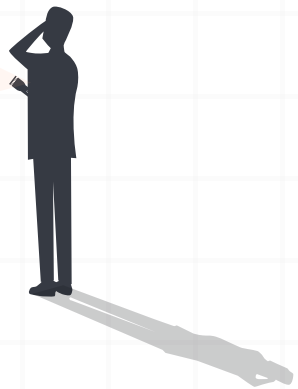
Family trust dilemma, gearing solutions and Division 296 estate planning



Felipe Araujo
Chief Executive Officer
Generation Life



Dr Sam Wylie
Principal Fellow, Melbourne Business School
Director, Windlestone Education





9 key features of investment bonds

Life Insurance and Tax Act

1.

Maximum tax rate of 30%
Tax Optimised generally ranges between 10% - 15%¹

2.

No distributions and access to funds at anytime

3.

Tax paid - no personal tax after no 10 year reset
- tax advantages within 10 years

4.

125% advantage

5.

Portability and tax-free transfers

6.

No personal capital gains tax on investment switching

7.

No tax file number required

8.

Creditor protection²

9.

Can be appropriately structured as a non-estate asset

1. Indicative effective average tax rates representing the estimated average annual tax as a percentage of earnings for each 12-month period over a future period of 15 years. Actual tax amounts payable are not guaranteed and may vary from year to year based on, amongst other things, the earnings of an investment option.
2. Creditor protection applies where the investment bond is appropriately structured and the client's intention is not to defeat creditors.

8 common misconceptions of investment bonds

Myth 1:

You can't access your money for 10 years

Myth 2:

They're old fashioned and inflexible

Myth 3:

They're tax-heavy

Myth 4:

They have limited investment options

Fact 1:

Access funds at any time
Greater tax benefits the longer invested

Fact 2:

New tax management processes
Enhanced estate planning flexibility

Fact 3:

Tax Optimised
Effective tax rates payable generally ranging between 10-15%¹

Fact 4:

Wide range of investment options
Across all major asset classes

1. Indicative effective average tax rates represent the estimated average annual tax as a percentage of earnings for each 12-month period over a future period of 15 years. Actual tax amounts payable are not guaranteed and may vary from year to year based on, amongst other things, the earnings of an investment option. Past performance is not a reliable indicator of future performance.

8 common misconceptions of investment bonds

Myth 5:

There are limits on how much you can invest

Myth 6:

They're expensive

Myth 7:

They produce poor returns

Myth 8:

Super is the best and only investment option for retirement

Fact 5:

125% rule designed to maximise tax benefits

Fact 6:

Administration fees are comparable to modern day platforms

Fact 7:

Returns are linked to the investment options chosen

From low-risk cash to high-risk geared options

Fact 8:

Tax-effective alternative to super if subject to caps

No death benefits tax

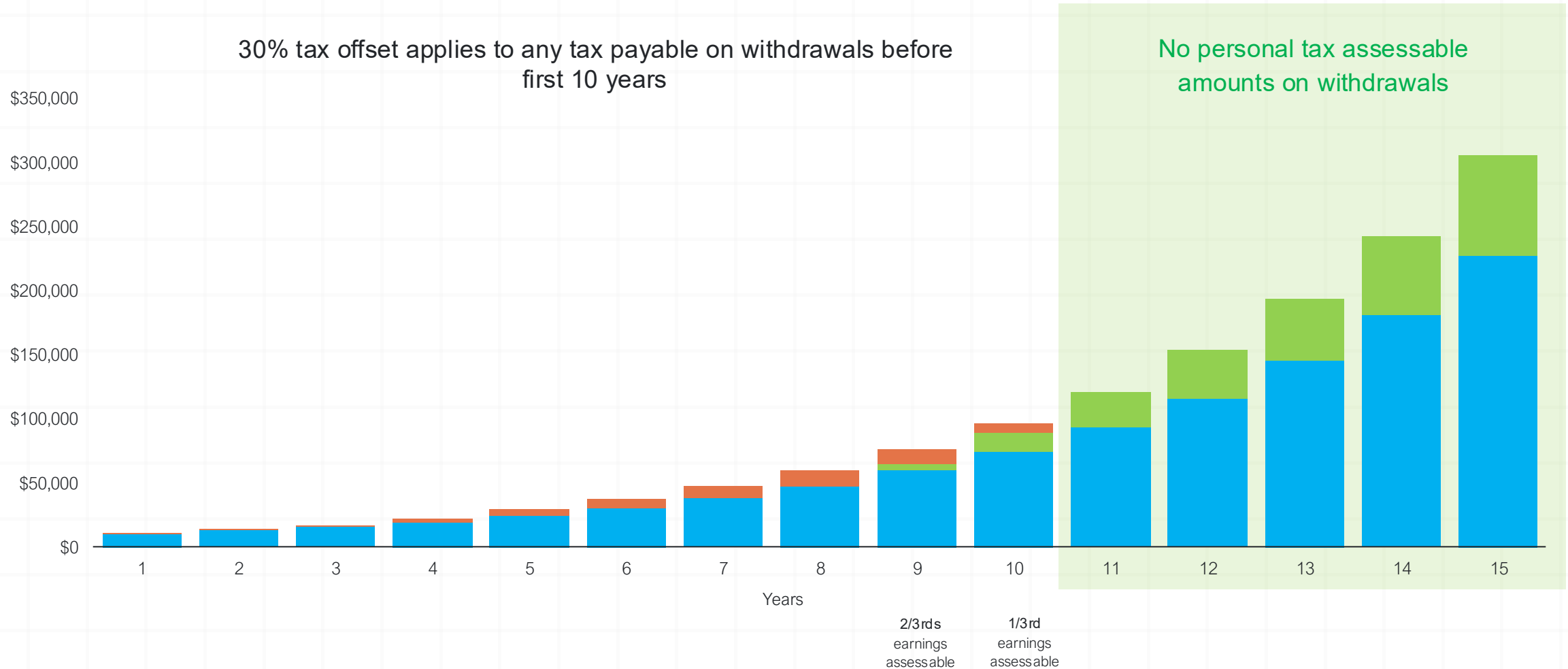
Manage proposed Division 296 tax



Tax Optimisation

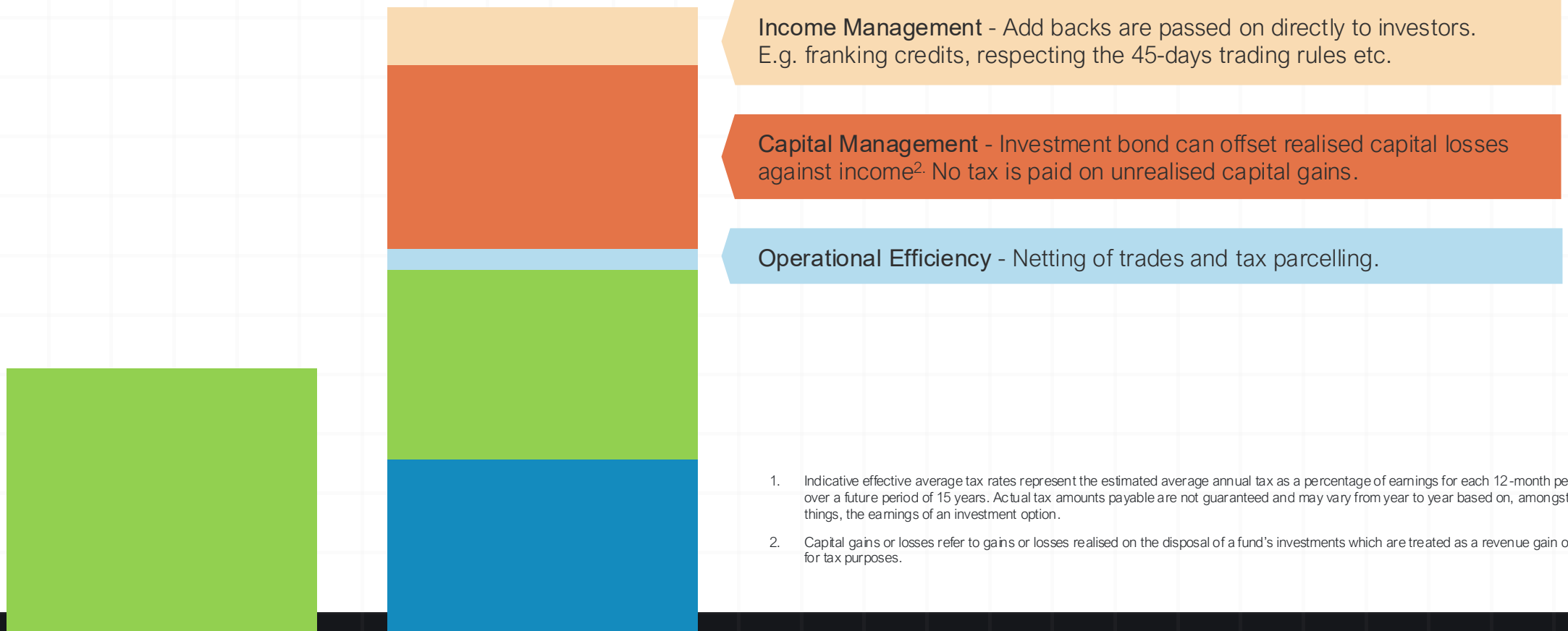
Generation Life Investment Bonds

Understanding the investment bond 10-year rule and 125% advantage



Tax management strategies within the investment bond structure?

Lowering the long-term effective tax rate to 10-15%¹



1. Indicative effective average tax rates represent the estimated average annual tax as a percentage of earnings for each 12-month period over a future period of 15 years. Actual tax amounts payable are not guaranteed and may vary from year to year based on, amongst other things, the earnings of an investment option.
2. Capital gains or losses refer to gains or losses realised on the disposal of a fund's investments which are treated as a revenue gain or loss for tax purposes.



Our track record on delivering **tax alpha**...



Performance comparison of Generation Life Tax Effective Australian Share Fund

As at 30 June 2026

	Headline investment return	Tax Optimised gross after-tax return	47% individual MTR after-tax return	39% individual MTR after-tax return	Company investor after-tax return	Tax Optimised after-tax return (after fees)
1 Year	6.07%	4.18%	2.99%	3.41%	3.89%	3.68%
2 Year p.a.	9.87%	9.40%	6.67%	7.22%	7.00%	8.90%
3 Year p.a.	10.58%	10.07%	7.51%	8.13%	7.92%	9.57%
4 Year p.a.	11.57%	10.45%	8.78%	9.51%	9.31%	9.95%
5 Year p.a.	7.70%	7.18%	4.77%	5.28%	5.54%	6.68%

*Headline and individual after-tax returns for the comparative fund are based on the performance of an equivalent S&P/ASX 200 Index ETF. Past performance is no indicator of future performance.

For assumptions, please refer to the Tax Optimised brochure: <https://genlife.com.au/tax-optimised-brochure>



Our track record on delivering **tax alpha**...



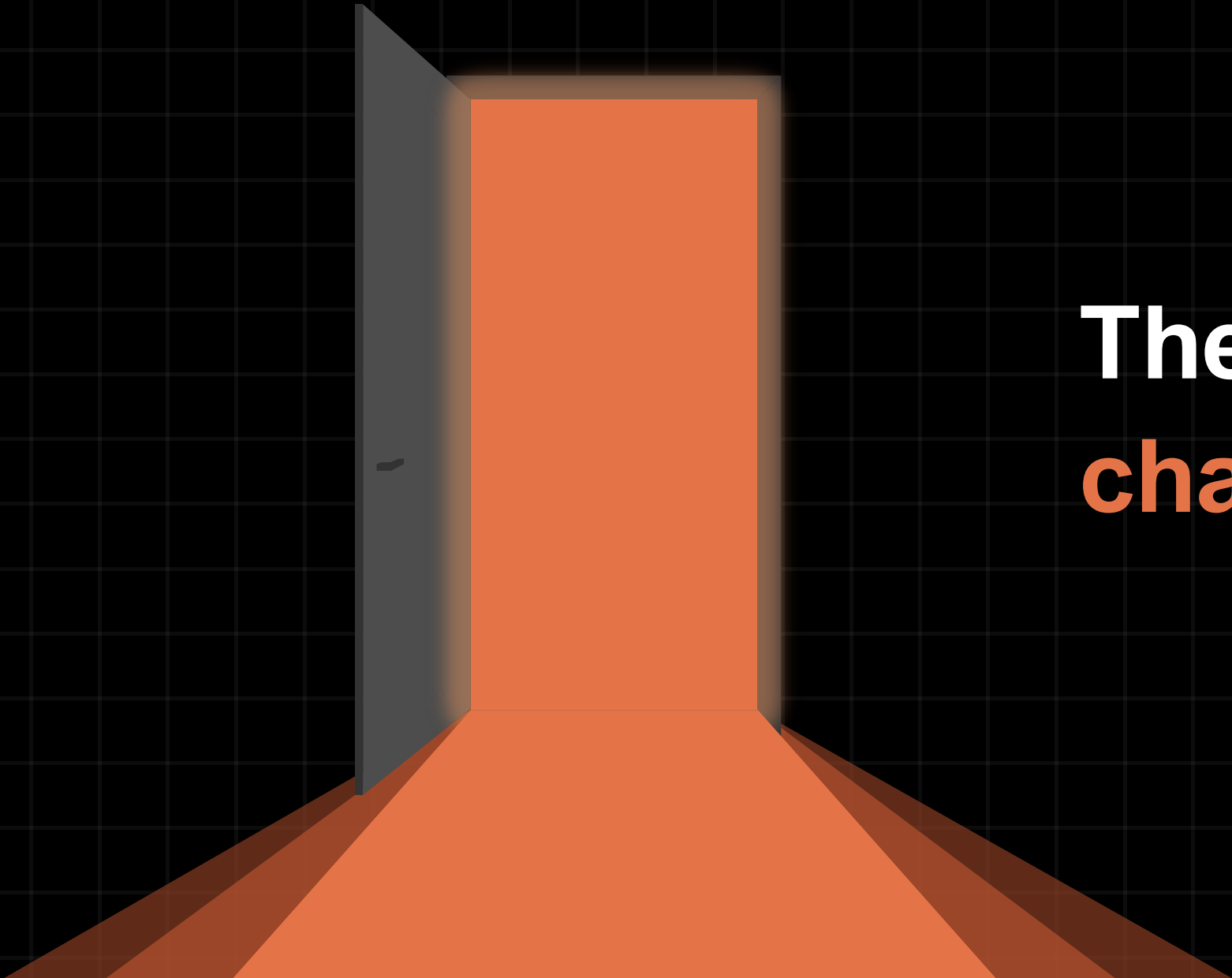
Performance comparison of Generation Life Tax Effective Global Share Fund

As at 30 June 2026

	Headline investment return	Tax Optimised gross after-tax return	47% individual MTR after-tax return	39% individual MTR after-tax return	Company investor after-tax return	Tax Optimised after-tax return (after fees)
1 Year	14.96%	18.56%	7.66%	8.81%	9.99%	18.06%

*Headline and individual after-tax returns for the comparative fund are based on the performance of an equivalent S&P/ASX 200 Index ETF. Past performance is no indicator of future performance.

For assumptions, please refer to the Tax Optimised brochure: <https://genlife.com.au/tax-optimised-brochure>

An illustration of an open door on the left side of the slide. The door is grey and slightly ajar, revealing a bright orange interior. A wide, orange path leads from the bottom center towards the doorway, creating a sense of perspective. The background is a dark grey grid.

**The next
chapter...**

30%

Tax at 30¢ in the dollar is the new normal

The new tax reality

Current **uncertainty**...

Tax-efficient investment opportunities are narrowing.

Already legislated...

Capital gains tax

- **Cost base indexation** – inflation adjusted – including pre-1985 assets
- **30% minimum tax** on taxable capital gains
- **All assets – not just property**
- **Commencing 1 July 2027** – grandfathering available
- **Superannuation/SMSFs** - not impacted

Superannuation

- **Division 296 tax a reality**
- **30% tax** on earnings for balances above \$3m
- **Further 10% tax** on earnings for balances above \$10m
- **Commencing 1 July 2026**

Discretionary Trusts

- **30% minimum tax** on taxable earnings
- **This limits the benefit of income streaming**
- **Impacts all trust beneficiaries**
- **30% non-refundable tax credit** available (except for corporate beneficiaries)
- **Potential double taxation** for corporate beneficiaries
- **Commencing 1 July 2028**





Comparing current position and proposed changes

 Individual beneficiaries

Current rules

New proposed changes

	Beneficiary 1	Beneficiary 2	Total	Beneficiary 1	Beneficiary 2	Total
Other taxable income	Nil	\$190,000		Nil	\$190,000	
Distribution received (net of tax)	\$50,000	\$50,000	\$100,000	\$35,000	\$35,000	\$70,000
Share of trust taxable income	\$50,000	\$50,000	\$100,000	\$50,000	\$50,000	\$100,000
Personal tax on trust taxable income	\$5,520	\$22,500	\$28,020	\$5,520	\$22,500	\$28,020
Tax credit used	-	-	-	\$5,520	\$15,000	\$30,000
Tax payable on trust income	\$5,520	\$22,500	\$28,020	\$0	\$7,500	\$7,500
Net of tax distribution received	\$44,480	\$27,500	\$72,248	\$35,000	\$27,500	\$62,500
Effective tax paid	11.0%	45.0%	28.0%	30.0%	45.0%	37.50%

Proposed changes assumptions

- Trust earns \$100,000
- Income only with no CGT
- No franking credits
- Trust pays tax at 30%
- Distributes income after tax of \$70,000
- Reports \$30,000 tax paid/tax credit to beneficiaries
- 50% income streamed to each beneficiary
- MTR rates excluding Medicare Levy for FY 27-28



Comparing current position and proposed changes

 Corporate beneficiary

	Current rules	New proposed changes
Distribution received	\$100,000	\$70,000
Tax on trust taxable income	\$30,000	\$30,000
Tax credit	-	-
Tax payable on distribution	\$30,000	\$30,000
Net of tax distribution received	\$70,000	\$40,000
Effective tax paid	30.0%	60.0%

- Proposed changes assumptions
- Trust earns \$100,000
 - \$70,000 income distributed to corporate beneficiary
 - \$30,000 tax credit not available to corporate beneficiary
 - Corporate beneficiary taxable income of \$100,000, 30% tax rate and no tax offset



Other tax considerations



Negative gearing

Who is impacted

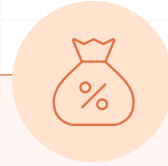
Investors negatively gearing established residential property purchased/contracted after 12 May 2026.

Individuals, partnerships, companies and most trusts – widely held trusts and super funds excluded.

Considerations

Property adding to housing stock exempted
Rental income losses quarantined and can only be offset in future against other residential income and capital gains

Other investment solutions or asset classes as alternatives to leverage and accumulate wealth



Super death tax

Who is impacted

Super death benefits paid to non-dependants attract a 15% tax on the taxable component

Considerations

Recontribution strategies may be limited depending on client position.



Income tax cuts

Who is impacted

The reduction in the second marginal tax rate tier from 16% to 15% from 1 July 2026, and to 14% from 1 July 2027

Complemented with proposed \$250 Working Australian Tax Offset and a \$1,000 instant tax deduction

Considerations

No plan by government to index marginal tax rates – budget constraints will determine affordability

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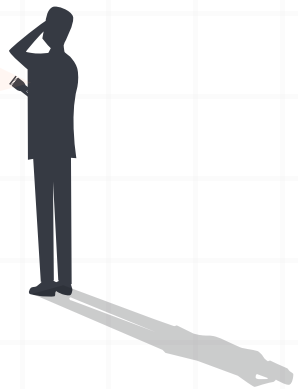
Family trust dilemma, gearing solutions and Division 296 estate planning



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Key Concepts

- The tax changes are very large, but change is normal, and well-advised investors adapt
- Need a single framework to understand all the changes, and to bring conversations back to
- Treasurer has targeted every mainstream strategy for reducing high personal taxes
- Target is minimum tax payments of 30%
- Capital gains still have major advantages over income
 - Delaying realization of capital gains is now even more important
 - Leveraging investment in shares becomes more important
- Advisors need to remake client's whole strategy
 - Types of assets, with more growth assets
 - Which assets are held in which structures
 - Amount and type of borrowing to invest



Planning for Australia's high personal taxes

1

Low-tax structures

2

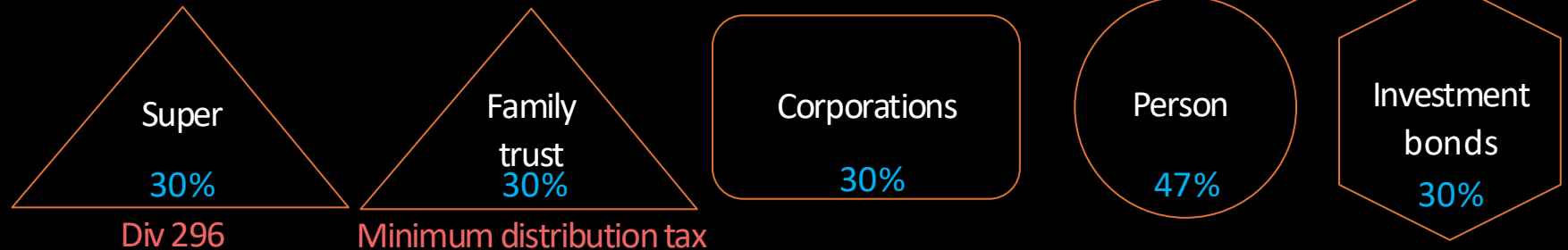
CGT advantages

3

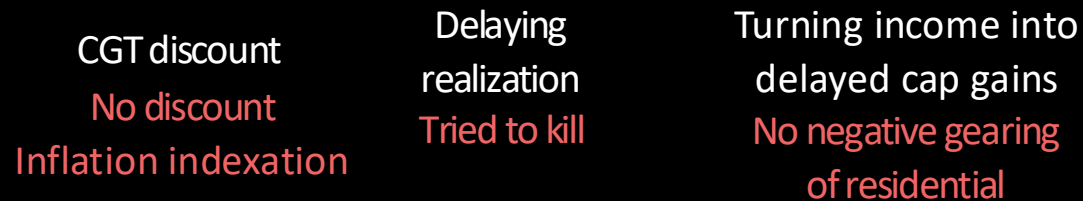
Income splitting &
smoothing

Planning for Australia's high personal taxes

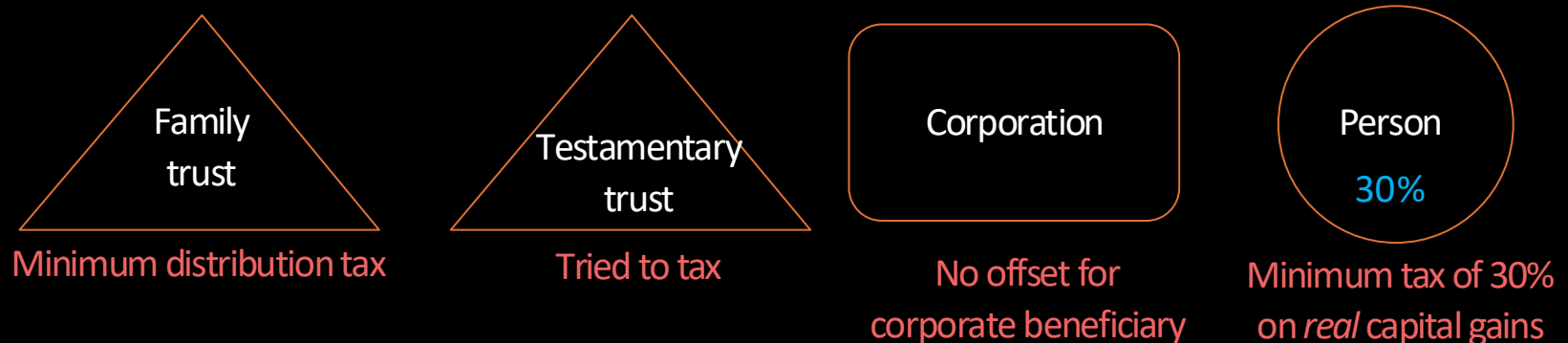
1 Low-tax structures



2 CGT advantages



3 Income splitting & smoothing



Low-tax structures

Super

Family
trust

Corporations

Person

Investment
bonds

Accumulation

	Income	Cap Gains
< \$3M	15%	10%
\$3M – \$10M	30%	20%
> \$10M	40%	26.7%

Pension

	Income	Cap Gains
< \$3M	0%	0%
\$3M – \$10M	15%	10%
> \$10M	25%	16.7%

Income	Cap Gains
30%	30%

Withholding tax, with
offset, on income &
capital gains

Income	Cap Gains
30%	30%

No offset of minimum
trust distributions tax

Effectively ends the use of
corporate beneficiaries

Income	Cap Gains
47%	47%

Inflation
indexed

Minimum 30% tax on
real capital gains

Income	Cap Gains
30%	30%

Contribution limits

No limit

No limit

No limit

No limit

Preservation age

No constraint

No constraint

No constraint

Tax-paid after 10 years

Final Tax

+ Top-up tax

+ Top-up tax

Final Tax

Final Tax

Discretionary

Discretionary



Planning for Australia's high personal taxes

1 Low-tax structures

2 CGT advantages

CGT discount

Delaying
realization

Turning income into
delayed cap gains

3 Income splitting & smoothing



Delaying realization

1 Low-tax structures

2 CGT advantages

3 Income splitting & smoothing

Effective CGT

47%

50% Discount

23.5%

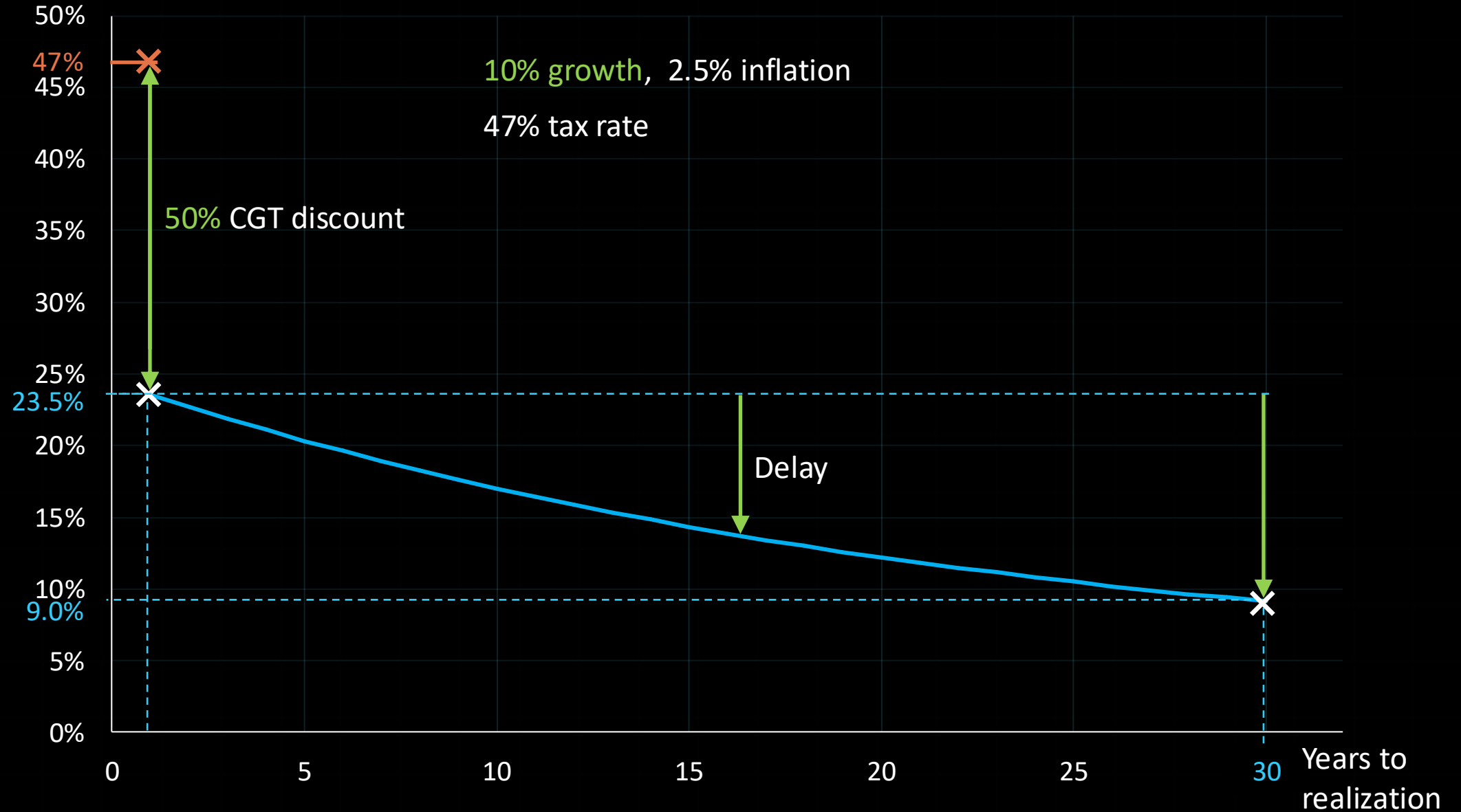
Delay

10 – 20%

The *effective* CGT rate is the percentage of an investor's return that is taken as tax

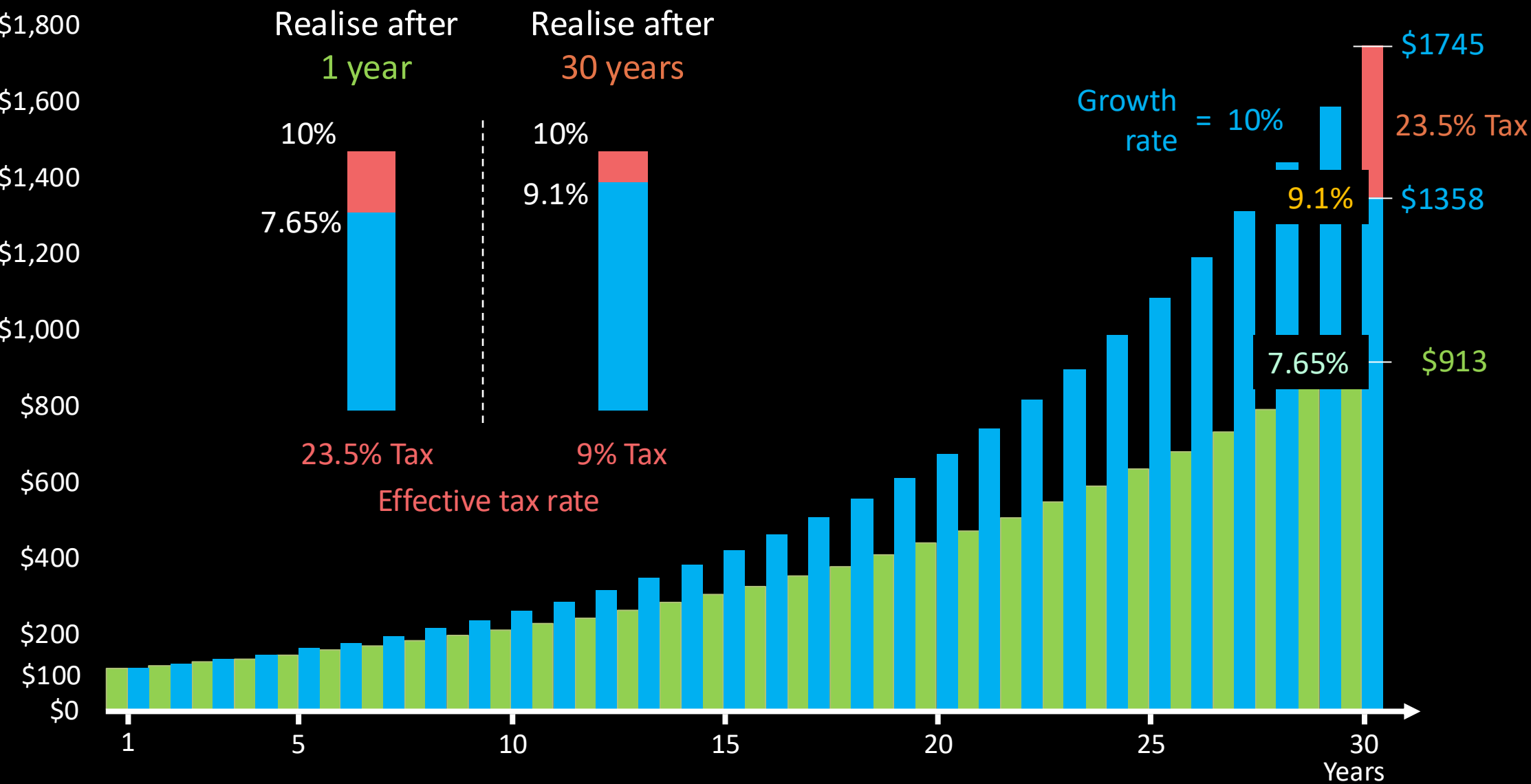


Effective Capital Gains Tax Rate



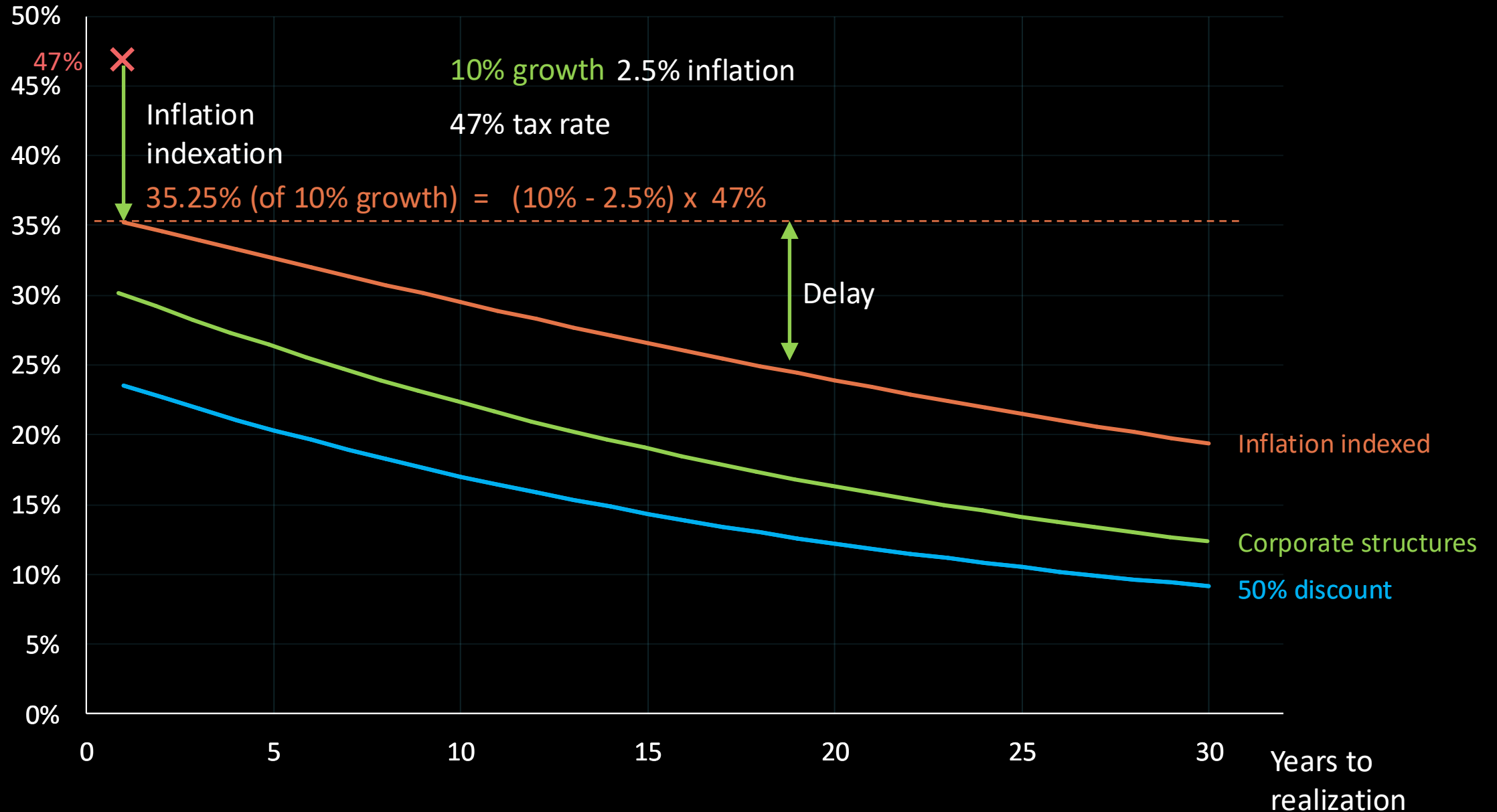


Delaying Realization of Capital Gains





Effective Capital Gains Tax Rate





Effective Capital Gains Tax Rate





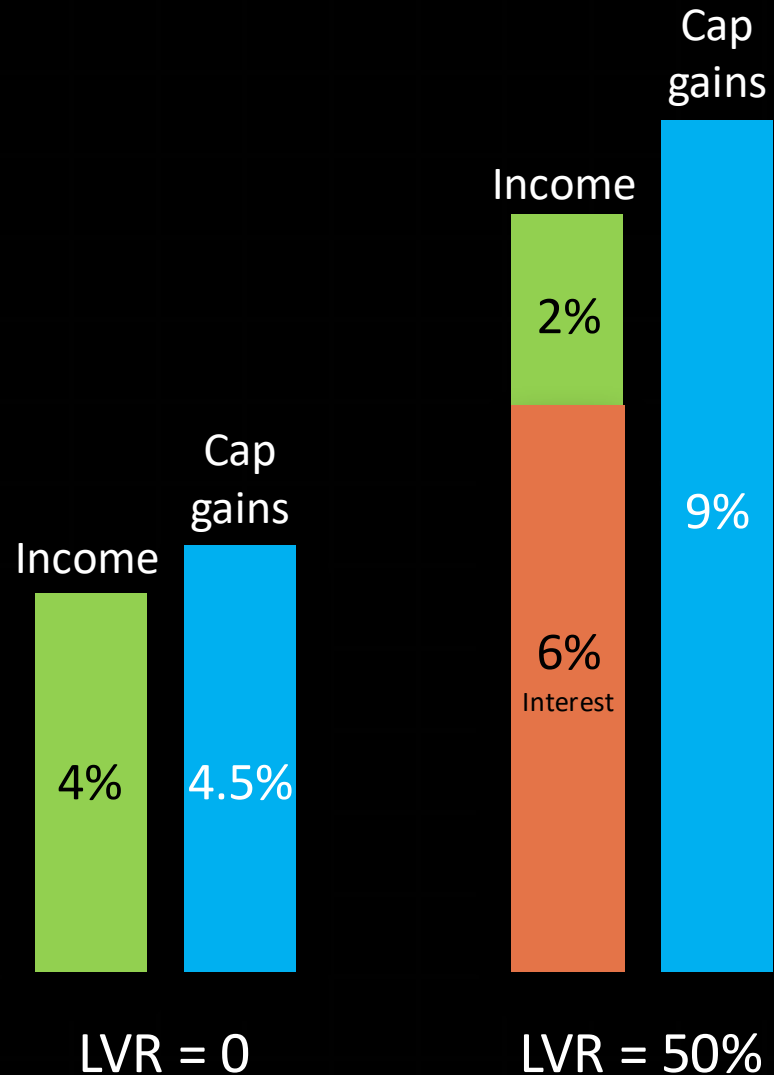
Turning income into capital gains

Debt

- Increases exposure
- Turns income into capital gains

Investment bonds

- Capital losses reduce taxable income in investment bonds
- Has the effect of turning income into delayed capital gains, from a tax perspective





Planning for Australia's high personal taxes

1 Low-tax structures

2 CGT advantages

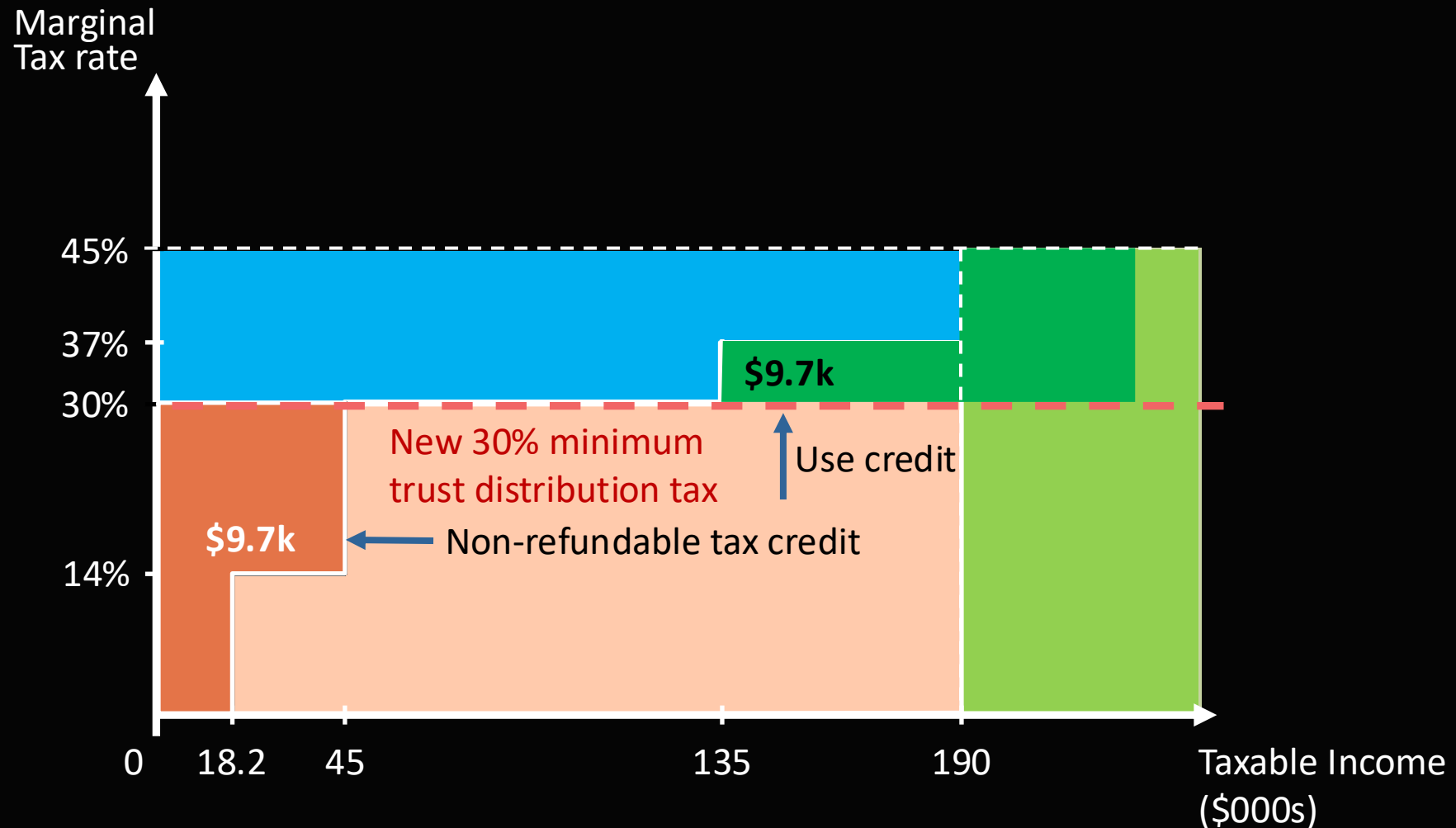
3 Income splitting & smoothing

Family
trust

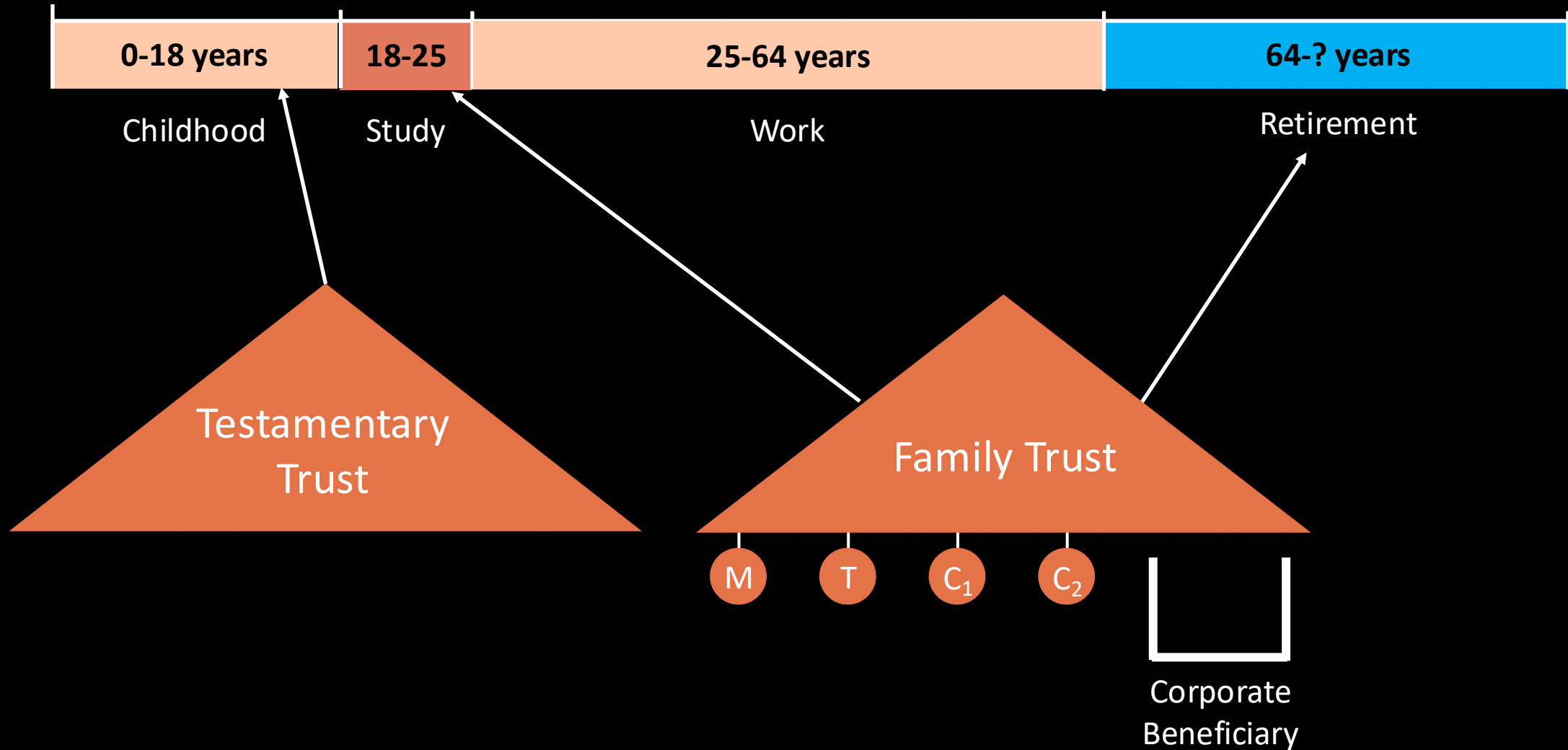
Testamentary
trust

Corporation

New 30% tax on Family Trust distributions



Smoothing lifetime income



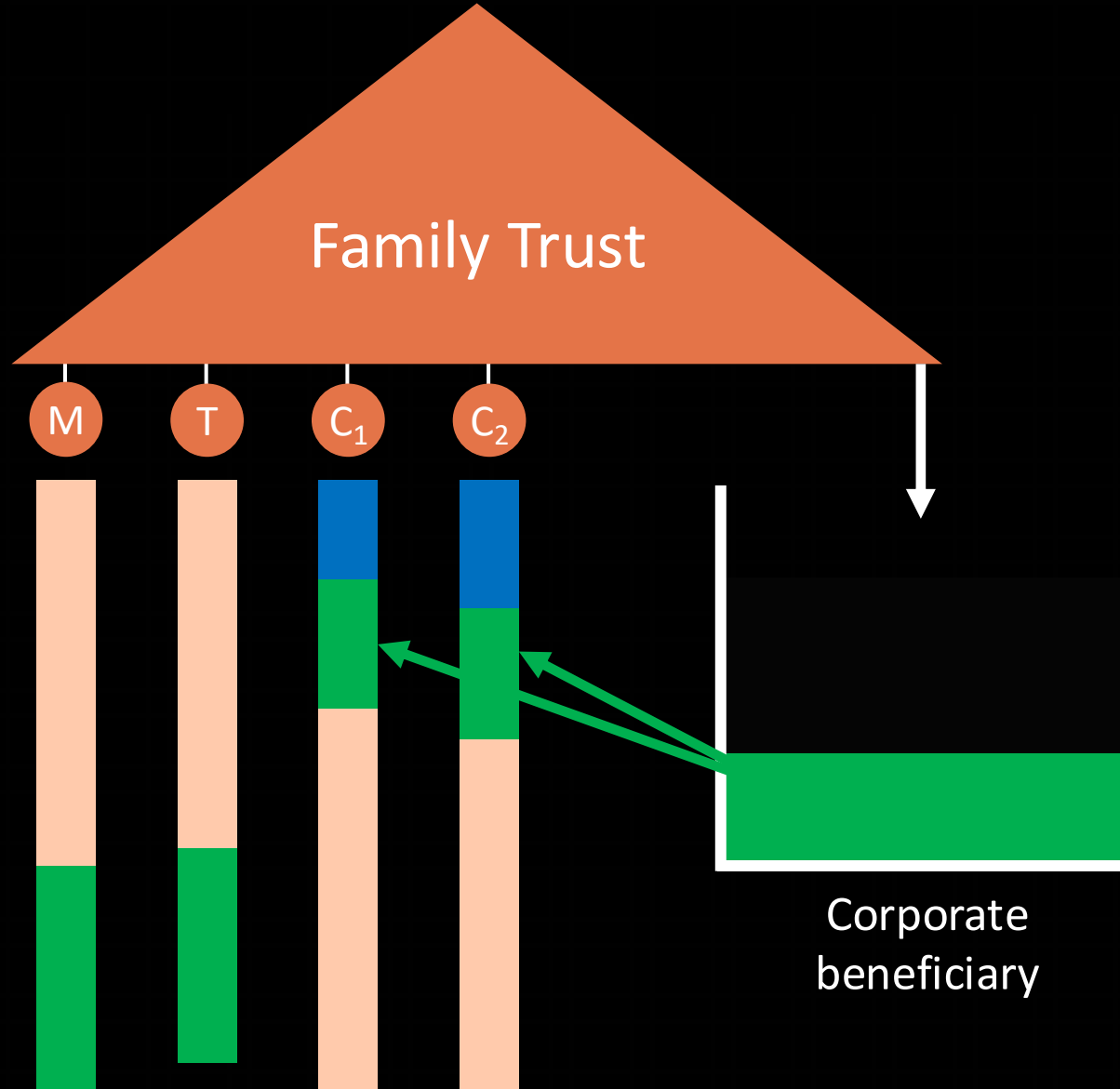
Income splitting

Family Trust

Children < 18 years 

On High Income 

On Low Income 



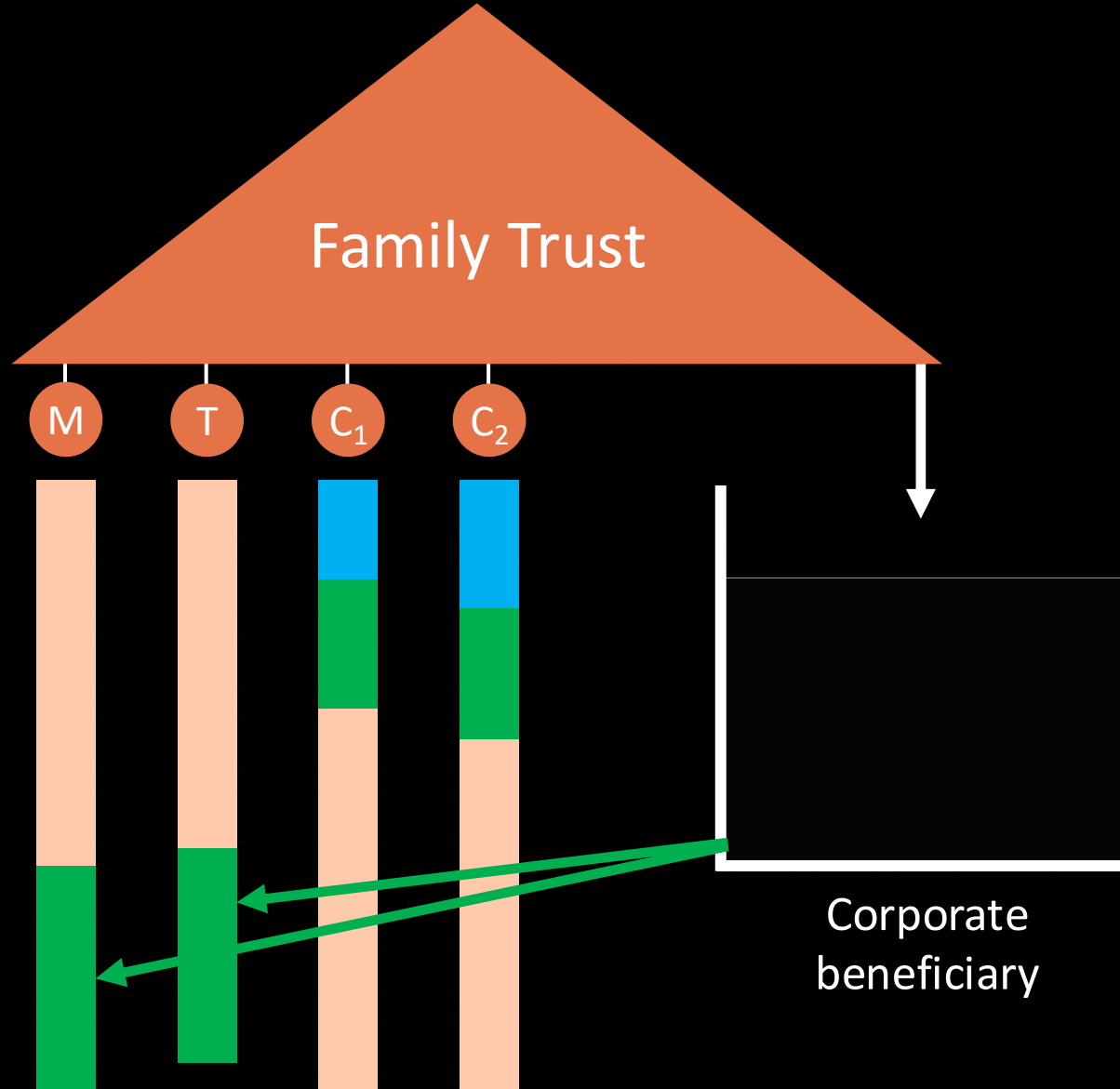
Income splitting

Family Trust

Children < 18 years 

On High Income 

On Low Income 





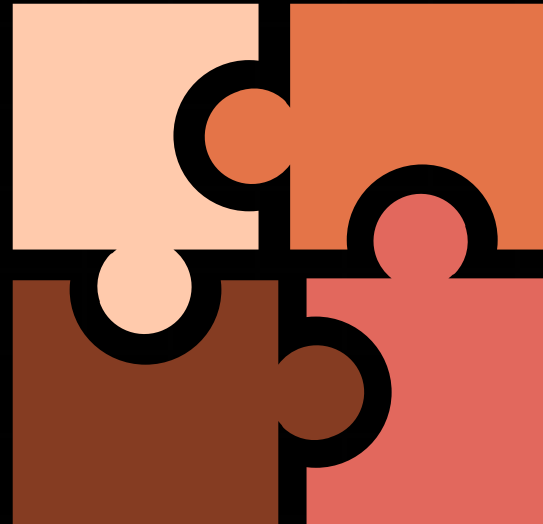
Investment Strategy

What to
invest in?

Strategic asset
allocation

How much
extra risk?

How much extra risk
and return



Where to hold
investments?

Structuring and tax

How to
Implement?

Bringing strategy into
existence

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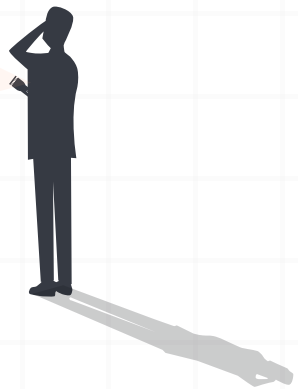
Family trust dilemma, gearing solutions and Division 296 estate planning



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The future of wealth planning

Going **beyond your typical structures**

01.

Need for structural
diversification

02.

Multiple tax environments

03.

Greater flexibility

Why this matters now?

Change isn't slowing down

Client portfolio structuring needs to be designed for change – not dependant on it

5 key uses of investment bonds

Investment bonds are designed to provide **tax-effective investment solutions** to help secure a financial future across all generations.



1.



Alternative to super

Tax-effective investing with estate planning certainty

2.



Estate planning

Be in control of transferring wealth

3.



Trusts

Reducing distributable income within trusts as accumulation vehicle

4.



Complementing super

Tax-effective structure to accumulate wealth alongside super

5.



Saving for a child

Meeting the rising costs of future generations

Case study

The family trust dilemma





Meet Travis and Lisa

Age	Travis (53) and Lisa (52)
Situation	Travis is a business owner Lisa is full time mother
Investments	\$5.6m in a discretionary (family) trust \$4.2m in superannuation
Family	Two adult children
Situation	Using a family trust to hold multiple assets and distribute income





Travis and Lisa's concerns

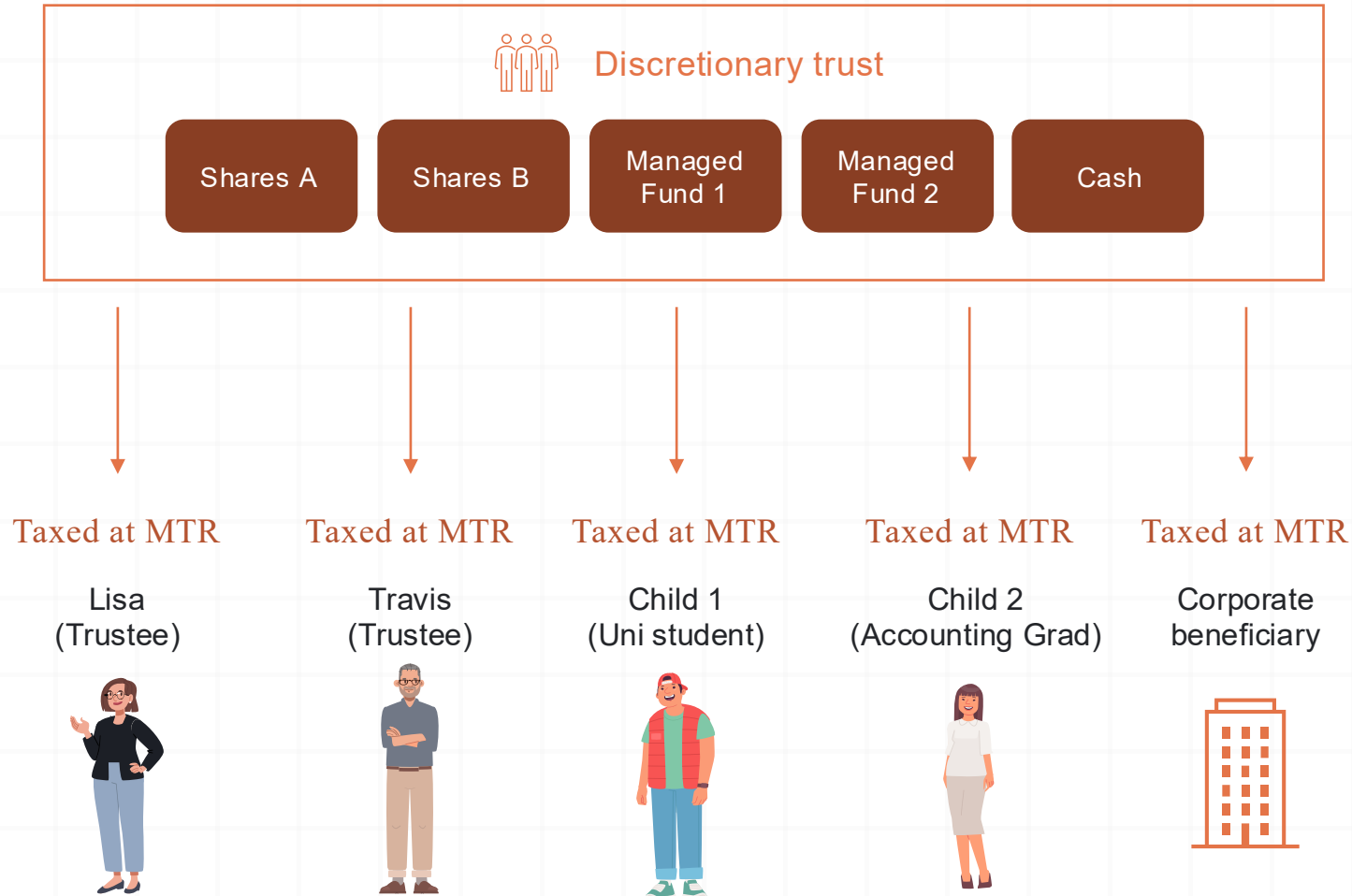
- ☐ Concerned about the distributions in the trust being taxed at a minimum of 30%
- ☐ Want to maintain flexibility and family control
- ☐ Want certainty around intergenerational wealth transfer



Travis and Lisa look at 2 options...

1. Maintain current trust structure
2. Sell trust assets and establish investment bonds

Travis & Lisa's current structure based on current rules...



Have been used for **income streaming**

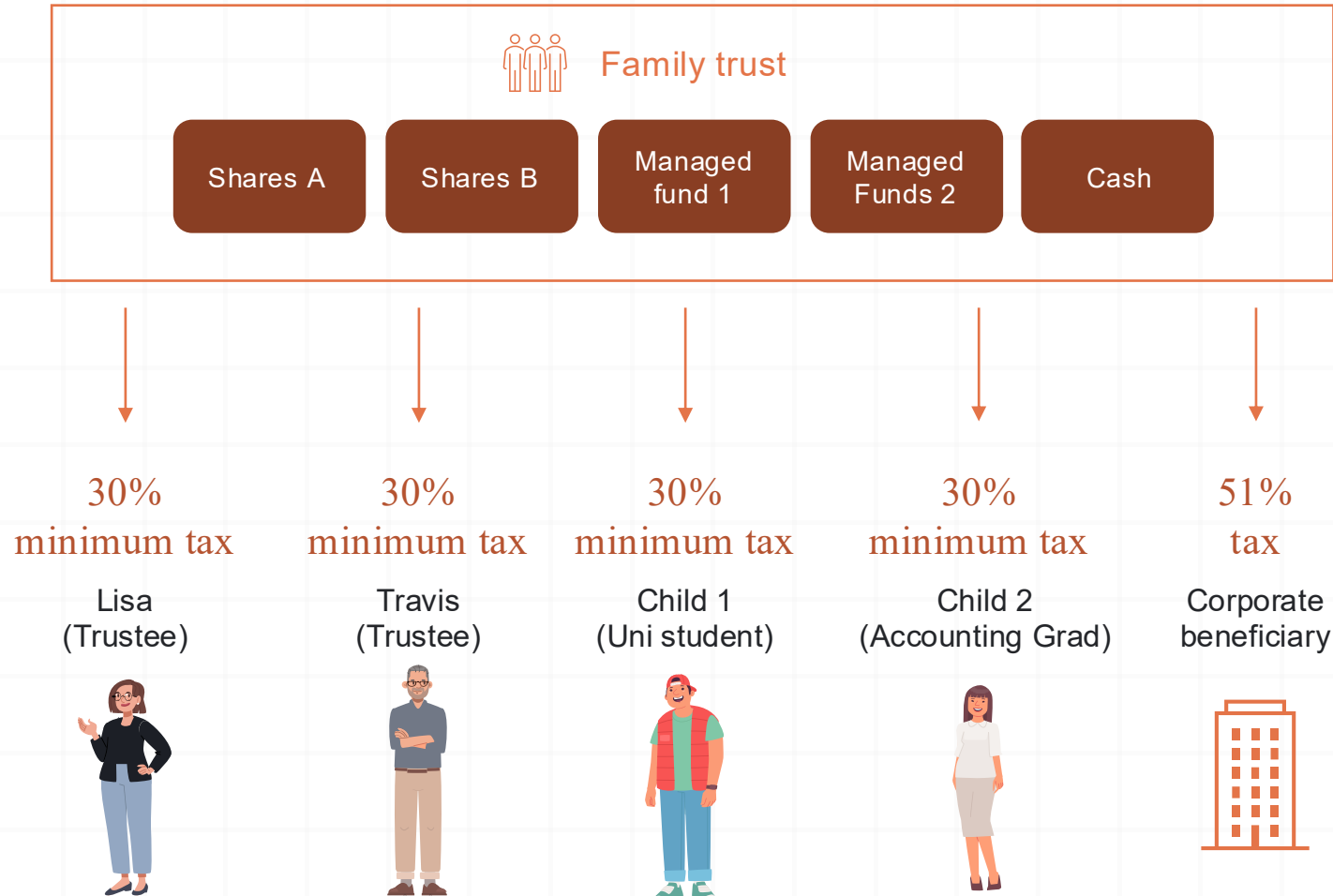
Taxed at beneficiaries' **MTR**

Stream dividends to **corporate beneficiary**

Corporate beneficiary is in effect a **tax deferral** strategy

Corporate beneficiary that ends up distributing back to discretionary trust to then distribute to individual beneficiaries would be a high risk tax avoidance strategy

Travis and Lisa's current structure based on the new rules...



Minimum tax of 30% for beneficiaries below 30% MTR

Assets held within trust **subject to CGT**

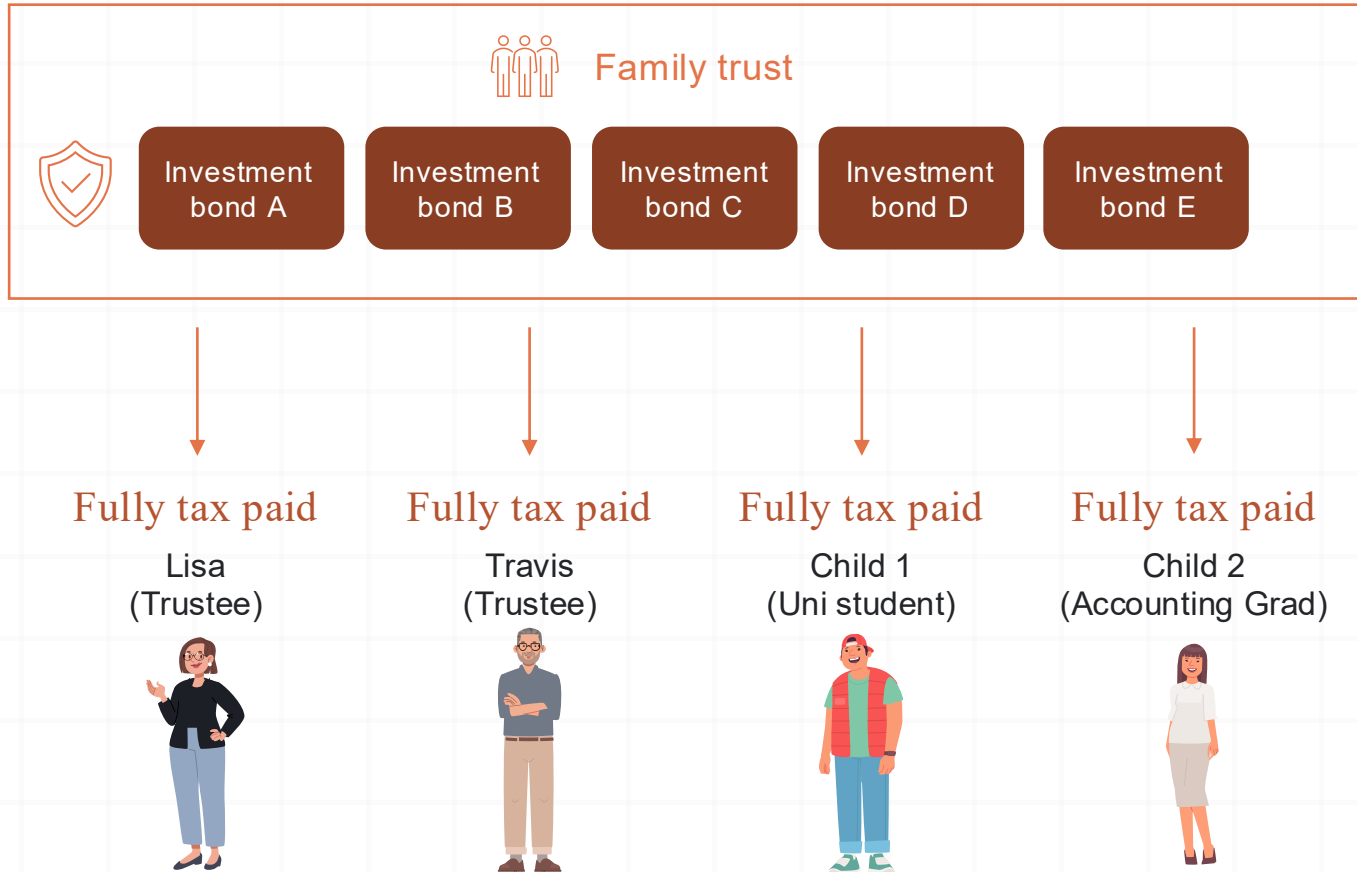
Distribution to bucket company **subject to potential double taxation**

No longer an income streaming strategy to beneficiaries

Non-refundable tax credit for individual beneficiaries

No tax credit for corporate beneficiary

Setting up **investment bonds** within a trust



Investment bonds are tax-paid – **maximum rate of 30%**

Tax-Optimised – effective tax rate generally ranging between **10%-15%** over the long term¹

Does not distribute income – no corporate beneficiary needed to manage tax

Income to beneficiaries can be controlled when needed

30% tax offset available against personal tax liability for pre-10 year withdrawals

1. Indicative effective average tax rates representing the estimated average annual tax as a percentage of earnings for each 12-month period over a future period of 15 years. Actual tax amounts payable are not guaranteed and may vary from year to year based on, amongst other things, the earnings of an investment option.

Travis' and Lisa's outcomes...



Retained family control
via trust structure



30% tax offset available
on withdrawals before 10-
years for adult children to
reduce their personal tax
liability



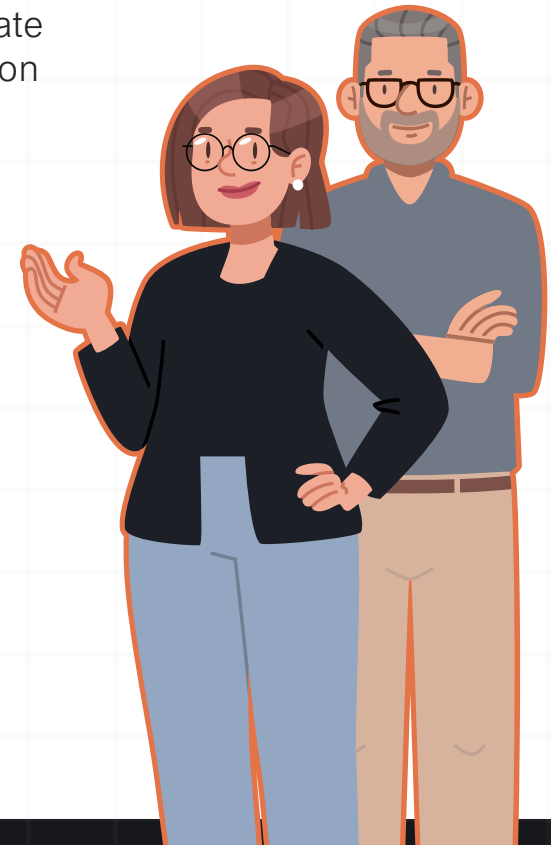
Tax-paid at maximum rate
of 30% – Tax optimisation
can further reduce
effective tax rate

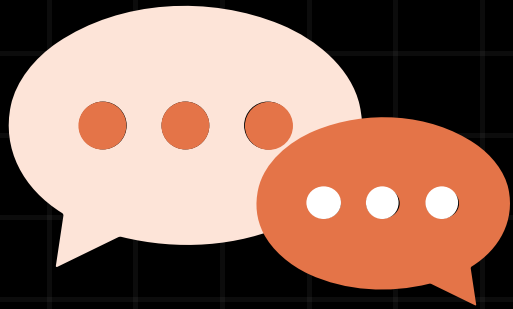


Simplified administration
over time



Greater certainty and control
when transferring wealth to
the next generation





The adviser conversation...

How to implement this as part of your practice?



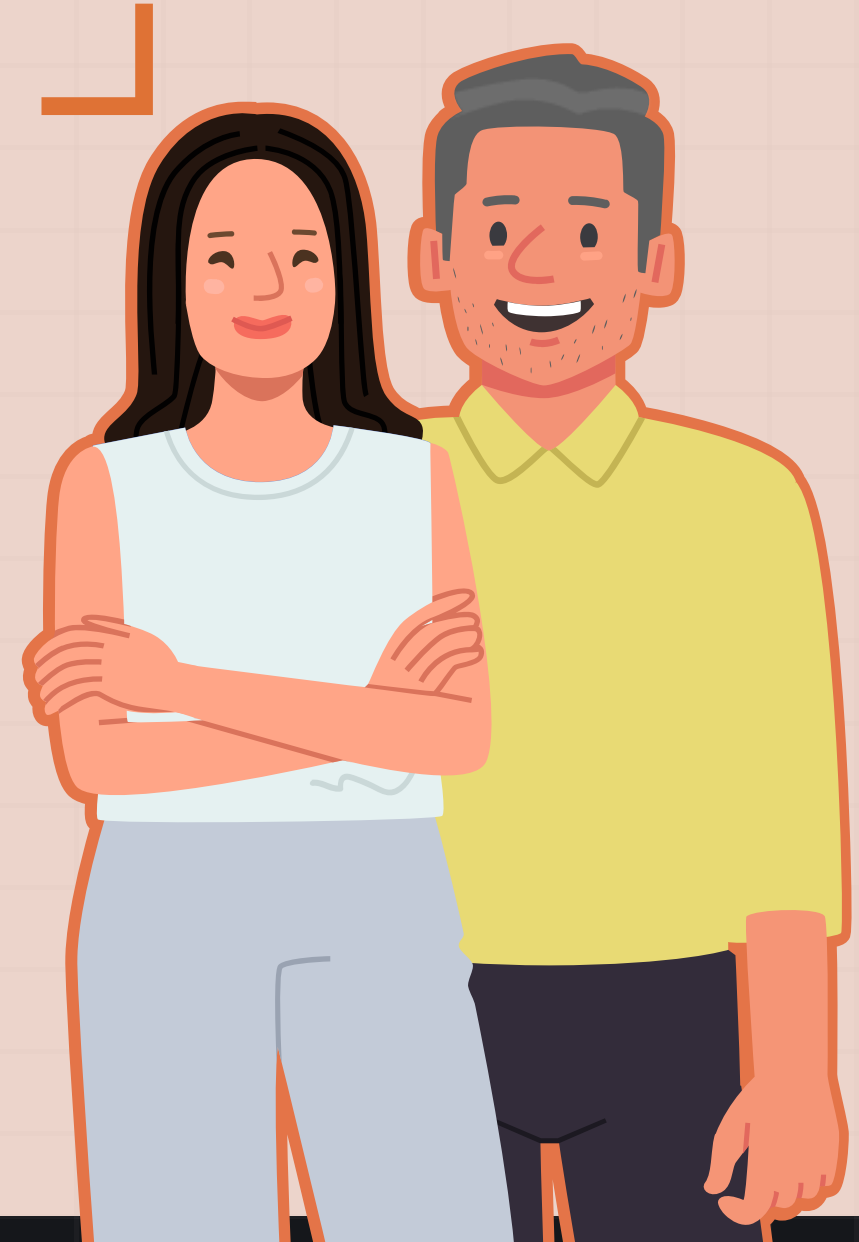
Case study

Gearing solution



Meet Michael and Rebecca

Age	Michael (48) and Rebecca (45)
Family	Two adult children both students at university
Tax	Combined income of \$520,000 p.a. – both on top marginal tax rates
Situation	Has \$450,000 available to invest after maximising their superannuation contributions and paying off their mortgage. Looking to reduce their taxable income and provide a legacy for the kids





Michael's and Rebecca's concerns

Due to recent Federal Budget announcement...

- ☐ Potential changes means they won't be able to implement their geared residential property strategy
- ☐ They don't have the capital needed to gear into commercial property and don't have the experience to do so

Michael and Rebecca want to explore their options



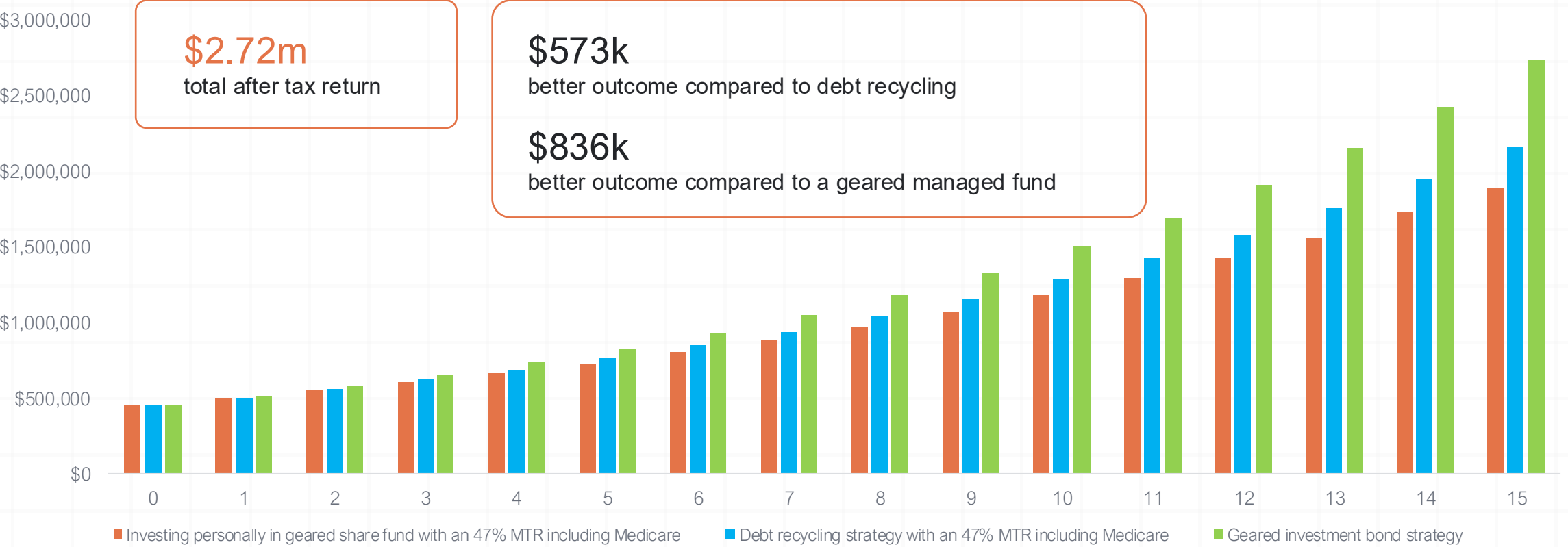
Michael and Rebecca look at 3 options...

1. Invest in a geared Australian share managed fund
2. Gear directly into shares or managed funds
3. Invest in an investment bond that is geared in Australian shares



Michael and Rebecca’s 3 options

Same \$450,000 of investable capital — but they establish a \$450,000 investment bond and invest into the Generation Life Tax Effective Australian Share Fund (Geared).



Assuming a total ungeared pre-tax and expenses return of 8.92% p.a. with income returns of 3.56% p.a. and growth returns of 5.36% p.a. Excludes the impact of administration and tax management costs. Assumes all interest costs are fully tax deductible within investment vehicle or strategy. Assumed interest rate margin above institutional interest rates assumed for investment bond and managed fund borrowings equivalent to 1.00% p.a. reflecting residential property owner occupied lending rates. Excludes the cost of any loan establishment charges. Assumes annual rebalance to target gearing level of 45% of asset/security value. All loan facilities are interest only with interest costs capitalised.

Michael and Rebecca's outcomes...



Access to a geared strategy



No personal CGT impact



Tax-paid investment structure and with no impact to MTR



No personal borrowing required & institutional rates

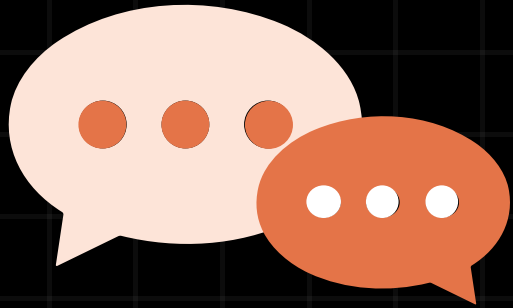


No loan management obligations



Estate planning opportunities





The adviser conversation...

How to implement this as part of your practice?



Case study

Division 296 and death tax





Meet Sandra

Age	75
Situation	Widow
Super	\$2.1m in pension phase \$3.9m in accumulation phase 70% taxable component for both
Family	Four grandchildren





Sandra's concerns

- ☐ Reduce impact of Division 296
- ☐ Flexibility to access funds whenever she wants, before she passes away
- ☐ Transfer wealth to her grandchildren tax-effectively by managing the impact of super death taxes

Sandra wants to explore her options



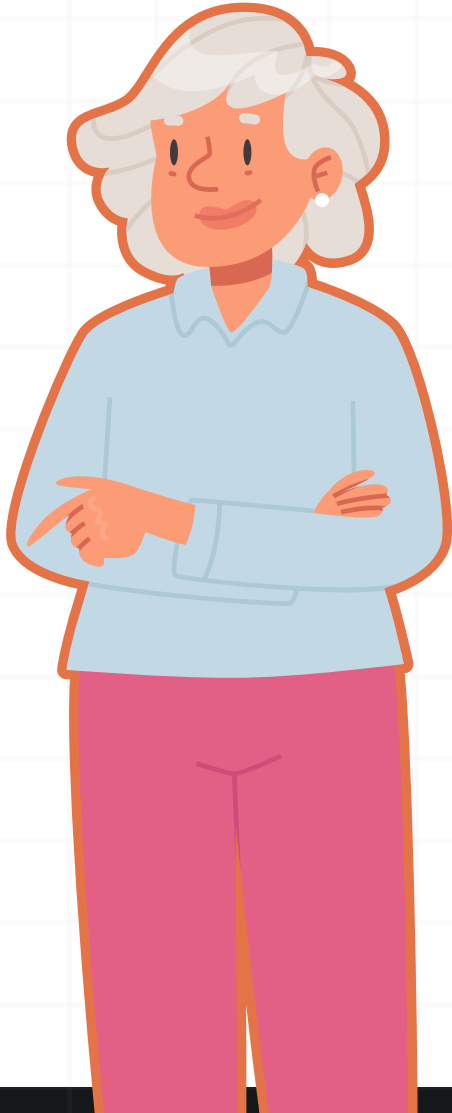
Sandra looks at 2 options...

1. Leave balances above \$3m in super and pay death benefit tax upon death
2. Withdraw balance above \$3m from superannuation and establish four investment bonds



What if Sandra establishes four investment bonds?

Age	Super with Division 296 tax	Super Death Benefits tax	Net super proceeds after death benefits tax	Investment bonds
85	\$4.75M	(\$0.57M)	\$4.19M	\$4.84m
90	\$5.76M	(\$0.68M)	\$5.07M	\$6.19M
				+\$1.12M

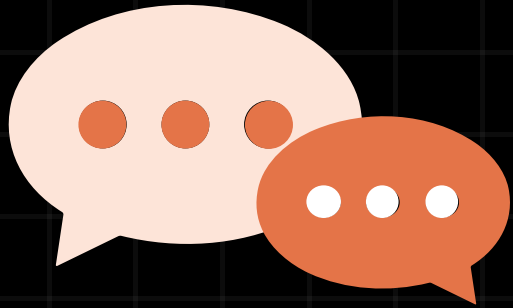


The graphs above illustrate the comparative outcomes of a Super accumulation account subject to the Division 296 taxes and investment bonds on initial amounts in excess of the Division 296 Total Superannuation Balance thresholds invested over 15 years without drawdowns. The scenario compares investment amounts in excess of the proposed \$3m threshold. The pre-tax investment returns assume a total return of 6.08% p.a., comprising a total income return of 1.96% p.a. and total growth return of 4.13% p.a., a franking level of 36.2% and excludes the impact of administration fees for both super and investment bond accounts. The illustration considers the TSB value at the end of each financial year and assumes that the payment of tax happens at the end of the financial year from the super account balance. Taxable Division 296 income is assumed to be grossed up (i.e. including franking credits and other tax offsets applicable) and realised gains earnings are discounted by 33.33%. TSB thresholds are assumed to be indexed in line with Division 296 indexation levels assuming an annual CPI rate of 3%. Taxable super component of 70% is assumed. Benefits are assumed to be paid to non-tax dependants with a death benefit tax rate of 15% plus 2% Medicare Levy. The illustration is based on Generation Life's understanding of the Division 296 tax outlined in the Treasury Laws Amendment (Building a Stronger and Fairer Super System) Act 2026 and the Superannuation (Building a Stronger and Fairer Super System) Imposition Act 2026. Actual outcomes may vary depending on investment performances, the assumptions actually occurring, tax regulation, and individual investor circumstances. Past performance does not indicate future performance.

Sandra's outcomes...

- ✓ Full access to funds whenever she needs
- ✓ Able to transfer wealth to her grandchildren tax-effectively
- ✓ She can place restrictions on accessing funds, including setting up a Regular Income Payment
- ✓ She can nominate a Co-Signatory to make once-off withdrawals as restrictions are in place
- ✓ No impact on recipient's personal tax position if investment bond is transferred to his intended recipients
- ✓ She avoids Division 296 tax and death benefit tax on balances above \$3m





The adviser conversation...

How to implement this as part of your practice?

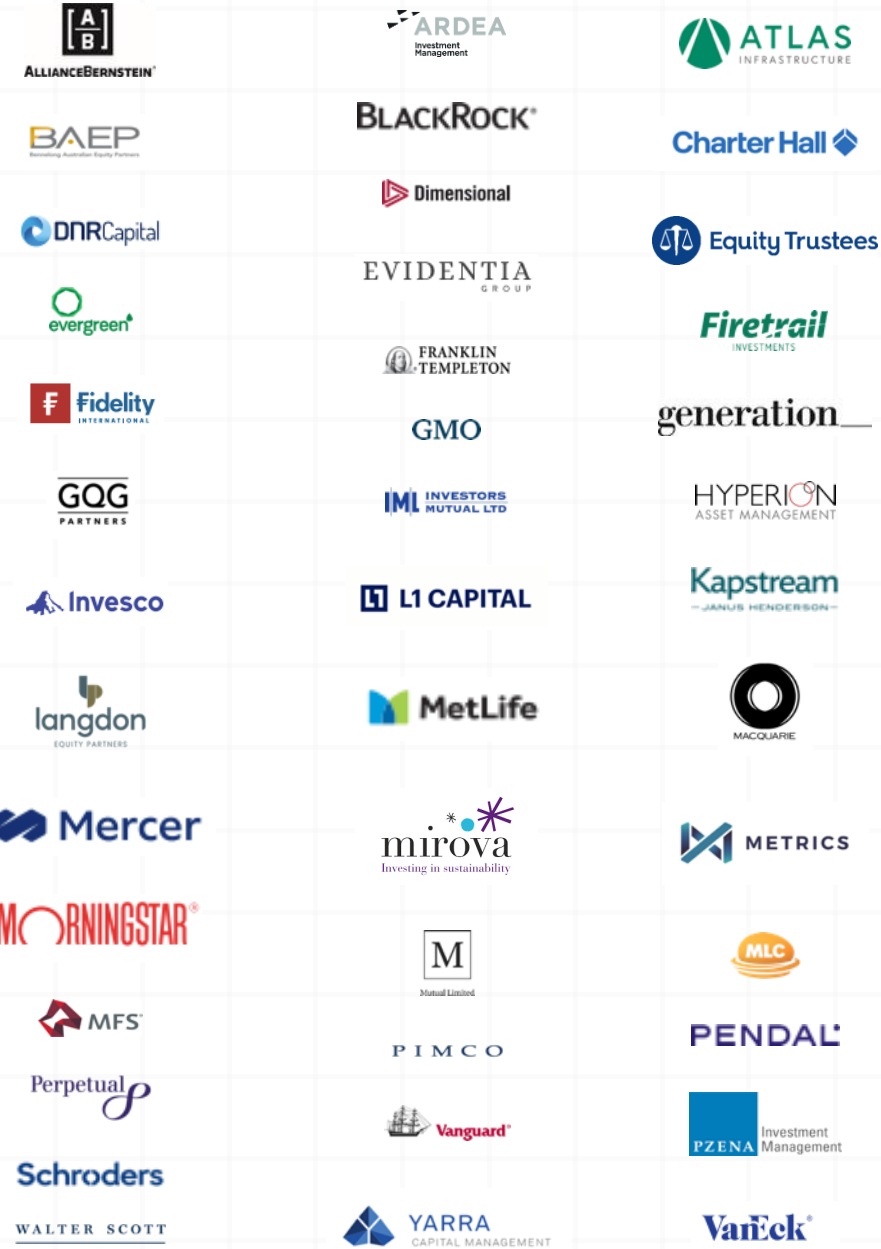


Our leading investment menu

Investment bonds

At Generation Life, we offer 78 investment strategies across all major asset classes, with 38 Tax Optimised investment options.

27 x	Diversified	21 x	 Tax Optimised
13 x	Australian shares	6 x	 Tax Optimised
16 x	International shares	7 x	 Tax Optimised
5 x	Australian fixed interest (including private credit)		
5 x	Property (including direct real estate)	1 x	 Tax Optimised
7 x	International fixed interest	3 x	 Tax Optimised
3 x	Alternatives		
2 x	Cash and deposits		
2 x	Pre-selected gearing investment strategies	1 x	 Tax Optimised





Thank you.

Generation Life

Highly recommended for over a decade

Awards



Research ratings



Investment Bonds¹

1. Rating relate to LifeBuilder and ChildBuilder investment bond products





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