

ANNEXURE M

This is a copy of Exhibit 75, Volume 8, Tab 121

Assumptions:

Litigation costs, net of insurance recovery, are from Most Likely Trowbridge model, updated 9 February. The Trowbridge model assumes 4% inflation on claims amounts.

Rental income assumes 3% CPI increases but ignores any Market Rate increases. A sinking fund of \$1.0m pa (inflated at 3% annually) has been deducted from rental income, to allow for major capital renovations to the properties.

Buildings maintain their nominal value, i.e. are not inflated or depreciated. Land increases in value at 3% pa. Properties are sold at March 2025, for their book value, and the cash proceeds invested.

Management costs (legal services, Directors fees etc) have been assumed at \$2.4m pa (inflated at 3% pa), but limited in later years an amount equal to the litigation outgoings, plus present day \$100k pa. There would be no need for a substantial legal dept and related cost structure if only minor amounts being paid out for litigation, and the only management required is for allocation of funds to charitable works.

It is not necessary to include any cashflows in relation to tax payments because separate detailed modelling has shown that:

- during the early years, when there are significant cash inflows through a combination of loan principal receipts and indemnity receipts, there will be no need to realise investment earnings and thereby create a tax liability
- in subsequent years, when the deferred investment earnings are realised, there will be sufficient accumulated losses from litigation and other outgoings to shelter the taxable investment earnings

Investment earnings of 11.70% are assumed, before tax.

Sensitivity analyses at various pre-tax earnings rates are attached.

Cashflows occur evenly through year, except for repayment of JHIL principal, external investment earnings and property proceeds which are received on 31 March.

DA 12/12/01
(Philly Morley presented)

**Sensitivity analysis for net assets remaining
for varying actuarial assumptions and projected earnings rates**

| | | |
|--------------------------------------|--------|--------|
| Gross earnings rate | 14.55% | 11.70% |
| Equivalent after-tax to 35% taxpayer | 9.5% | 7.6% |

Assets remaining after 15 years (in A\$'000)

| | | |
|----------------------|---------|---------|
| Most Likely Scenario | 334,610 | 211,904 |
| High Scenario | 262,019 | 148,890 |

Assets remaining after 20 years (in A\$'000)

| | | |
|----------------------|---------|---------|
| Most Likely Scenario | 418,959 | 158,972 |
| High Scenario | 217,224 | (5,473) |

Assets remaining after 30 years (in A\$'000)

| | | |
|----------------------|-----------|-----------|
| Most Likely Scenario | 1,104,998 | 60,230 |
| High Scenario | 100,737 | (625,227) |

Assets remaining after 40 years (in A\$'000)

| | | |
|----------------------|-----------|-------------|
| Most Likely Scenario | 4,100,514 | 16,935 |
| High Scenario | 36,374 | (2,190,170) |

Assets remaining after 51 years (in A\$'000)

| | | |
|----------------------|------------|-------------|
| Most Likely Scenario | 18,249,057 | 38,586 |
| High Scenario | 108,317 | (7,440,244) |

^h Assumes indemnity payment of \$112 million with PV of \$72.5 million

**Sensitivity for earnings rates
Assumes Most Likely Scenario
Assets available
in A\$'000**

| | Investment earnings, pre-tax | | | | |
|----------|------------------------------|---------|---------|-----------|-----------|
| | 9.70% | 10.70% | 11.70% | 12.70% | 13.70% |
| 10 years | 213,334 | 227,085 | 241,883 | 257,800 | 274,913 |
| 15 years | 149,478 | 178,589 | 211,904 | 249,927 | 293,215 |
| 20 years | 48,463 | 97,795 | 158,972 | 234,156 | 325,859 |
| 25 years | - | - | 103,743 | 243,600 | 427,309 |
| 30 years | - | - | 60,230 | 319,569 | 685,423 |
| 40 years | - | - | 16,935 | 880,311 | 2,287,367 |
| 50 years | - | - | 34,960 | 2,892,543 | 8,240,742 |
| 51 years | - | - | 38,586 | 3,259,429 | 9,369,255 |

