
14624/J XXVII. GP

Eingelangt am 27.03.2023

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Anfrage

der Abgeordneten Elisabeth Götze, Hermann Weratschnig, Freundinnen und Freunde
an den Bundesminister für Arbeit und Wirtschaft

betreffend Flughafen Wien AG – Erwerb von Beteiligungen durch einen karibischen Investor

BEGRÜNDUNG

Bezug wird genommen auf die Anfrage 13176/J XXVII. GP, eingelangt am 01.12.2022, und die dazu ergangene Anfragebeantwortung 12824/AB vom 01.02.2023.

In der Anfrage 13176/J XXVII. GP haben wir dargelegt, dass es sich bei dem Investor, dem IFM Global Infrastructure Fund, um einen intransparenten Trust auf den Cayman Islands handelt und nicht – wie jahrelang suggeriert – um einen australischen Pensionsfonds. Zu diesem Zeitpunkt hielt der karibische Trust über zwei luxemburger Holdinggesellschaften bereits eine Beteiligung von mehr als 40% an der Flughafen Wien AG. Wir haben unsere Ausführungen mit den entsprechenden Dokumenten untermauert.

Obwohl schon vor unserer Anfrage die Struktur des Investors im Bundesministerium für Arbeit und Wirtschaft bekannt sein musste – die Landessprecherin der Grünen Niederösterreich, Landtagsabgeordnete Helga Krismer, hatte Ihnen das uns damals vorliegende Informationspaket bereits zu einem wesentlich früheren Zeitpunkt per Einschreiben zukommen lassen – haben Sie dem karibischen Investor gemäß Investitionskontrollgesetz (InvKG) gestattet, seine Beteiligung von über 40% um weitere fast 10% bis zu 50% minus 1 Aktie des Aktienkapitals der Flughafen Wien AG aufzustocken.

Anlässlich der Präsentation des Ergebnisses des Verfahrens nach dem InvKG wurden Sie in der Presseaussendung Ihres Ministeriums vom 24. Jänner 2023 zitiert wie folgt [Hervorhebungen durch die Autor:innen]:

„Ausländische Investitionen in österreichische Unternehmen sind grundsätzlich zu begrüßen, da sie Investitionskapital bringen, das für die Weiterentwicklung des österreichischen Wirtschaftsstandorts wichtig ist. Bei Drittstaats-Investitionen in bestimmten besonders sensiblen Bereichen, die gewisse Schwellenwerte übersteigen, gibt es eine Prüfung im Rahmen des Investitionskontrollverfahrens. Dabei wird festgestellt, ob **die Sicherheit und öffentliche Ordnung Österreichs gewahrt bleiben. Ein** solches Verfahren wurde auch im Fall der aktuellen Investition in den Flughafen Wien-Schwechat unter Anwendung sämtlicher Prüfkriterien durchgeführt und nun abgeschlossen.“

Weiters in derselben Presseaussendung:

„Im Ergebnis konnte durch strenge Auflagen sichergestellt werden, dass die ausländische Antragstellerin durch ihre Investition auch auf sonstige Weise keinen beherrschenden Einfluss auf den Flughafen Wien-Schwechat erlangt: Zusätzlich zu den beiden bestehenden dürfen keine weiteren Aufsichtsratsmitglieder von der Antragstellerin nominiert werden, sie darf keine Satzungsänderungen vorschlagen und ihr werden gewisse Berichtspflichten auferlegt. **Im Zuge des Verfahrens hat die Antragstellerin die Eigentümerstruktur offengelegt. Es liegen keine Gründe vor, die für eine Untersagung der Investition sprechen würden.** Die Investition wird daher von der Investitionskontrollbehörde nicht untersagt.“

Zwischenzeitig haben wir weitere Informationen erhalten und führen ergänzend zu der ersten Anfrage aus:

Jener „Berater“, die australische Firma IFM Investors Pty Limited, die den karibischen Investor in Österreich vermarktet und dabei den Eindruck entstehen lässt, es handle sich um Investitionen eines oder mehrerer australischer Pensionsfonds, – wir sind bereits in unserer ersten Anfrage auf ihn eingegangen – , hat sich in den USA bei der dortigen "Securities and Exchange Commission" (SEC) als „Investment Advisor“, also Investitionsberater, eintragen lassen. Im Zuge dessen musste er ein umfangreiches „ADV-Form“ ausfüllen und darin offenlegen, woher die Gelder in den IFM Global Infrastructure Fund, dem Großaktionär der Flughafen Wien AG, fließen. IFM Investors Pty Limited gab in diesem SEC-Dokument an, dass es sich beim IFM Global Infrastructure Fund um einen „Master Fund“, also eine Hauptsammelstelle für Geld handelt, an der 17 sogenannte "Feeder Funds" ("Fütterungsfonds") beteiligt sind, die ihre Gelder an den Hauptfonds weiterleiten.

Die Fütterungsfonds haben ihre Sitze laut dieser SEC-Unterlage in Australien, Kanada, Großbritannien und den USA, einer hat seinen Sitz auf den Cayman Islands. Dieser ist eine Geldsammelstelle in der Rechtsform „Limited Partnership“ namens „IFM Global Infrastructure (Offshore), L.P“ mit Sitz an derselben Adresse wie der Großinvestor am Flughafen Wien, der IFM Global Infrastructure Fund, nämlich bei dessen Treuhänder. Die beiden teilen sich sogar denselben Briefkasten mit der Nummer 2681 am Cricket

Square, Hutchins Drive in George Town, Grand Cayman, bei der Treuhandfirma Conyers Trust Company (Cayman) Limited.

Beim Großaktionär am Flughafen Wien handelt es sich also um eine riesige Kaskade an Eigentümern und Geldflüssen, die bei einem professionellen Treuhänder auf den Cayman Islands zusammenlaufen.

Vorgelegt wird als Beilage ./1 ein Auszug aus dem ADV-Form der SEC (S. 1 sowie 46-61) mit den Angaben zu IFM Investors Pty Limited und zum IFM Global Infrastructure Fund als Master Fund samt seinen 17 Feeder Funds, weiters als Beilage ./2 der „Suchbericht“ aus dem Firmenregister der Cayman Islands zum Feeder Fund IFM Global Infrastructure (Offshore), L.P. Der „Suchbericht“ zum IFM Global Infrastructure Fund, dem Hauptfonds und Großaktionär am Flughafen Wien, wurde bereits bei der ersten Anfrage vorgelegt und wird hier der Einfachheit halber nochmals als Beilage .3/ angeschlossen.

In den „Suchberichten“ aus dem Firmenregister der Cayman Islands heißt es sowohl beim Master Fund als auch beim Feeder Fund wortgleich (Beilagen ./2 und ./3):

- “- INFORMATION REGARDING THE CORPORATE RECORDS AND REGISTERS ARE NOT AVAILABLE FOR PUBLIC INSPECTION
- THIS REPORT DOES NOT CONFIRM THE ENTITY IS IN GOOD STANDING”

[Informationen zu den Unternehmensunterlagen und Registern stehen nicht zur öffentlichen Einsichtnahme zur Verfügung. Dieser Bericht stellt keinen Existenznachweis des Rechtsträgers dar.]

Schließlich verweisen wir darauf, dass der „Berater“ des Großaktionärs am Flughafen Wien, IFM Investors Pty Limited, nicht in der Lage ist, eine unmissverständliche Aussage darüber zu machen, ob auch russische Gelder veranlagt werden. Im „Guardian“-Artikel vom 2. März 2022 über die russischen Verbindungen australischer „Superfonds“ heißt es (Beilage ./4):

“Meanwhile, IFM Investors, a group through which industry super funds make investments into things such as airports, toll roads and the like, said it had “no direct investors nor investments that are included on relevant global sanctions lists”.

[IFM Investors, eine Gruppe, über die Industrie-Superfonds in Dinge wie Flughäfen, Mautstraßen und ähnliches investieren, sagte, sie hätten "keine direkten Investoren oder Investitionen, die auf einschlägigen globalen Sanktionslisten angeführt sind".]

Es reicht schon, beispielsweise, den Feeder Fund des Investors auf den Cayman Islands dazwischen zu schieben und schon ist das Investment nicht mehr „direct“.

Das völlig intransparente Geldsammelverfahren über die beschriebene Kaskade, das nichts mit den EU-Richtlinien für Investmentfonds gemeinsam hat, und insbesondere

über die Cayman Islands, die wohl nicht zufällig von der EU-Kommission als Geldwäschehochrisikoland eingestuft werden, öffnet der Umgehung der EU-Sanktionsvorschriften Tür und Tor.

Die Vermögenswerte, die dem „Berater“ IFM Investors Pty Ltd zur Verfügung stehen, wachsen besorgniserregend schnell an. Hieß es im Übernahmeangebot 2014 es seien 35 Milliarden Euro, so waren es im Übernahmeangebot 2016 bereits 45,1 Milliarden Euro. Im Übernahmeangebot 2022 wurde der Betrag mit 122 Milliarden Euro angegeben.

Die unterfertigten Abgeordneten stellen daher folgende

ANFRAGE

1. Zu der oben angeführten Aussage, dass ausländische Investitionen in österreichische Unternehmen zu begrüßen seien, da sie Investitionskapital bringen, das für die Weiterentwicklung des österreichischen Wirtschaftsstandorts wichtig ist:

1.1. Welche Weiterentwicklung ist hier im konkreten Fall angesprochen?

1.2. Angesichts dessen, dass beim Kauf eines Aktienpaketes an der Börse – wie im gegenständlichen Fall – das investierte Geld an die Verkäufer und nicht an die Aktiengesellschaft fließt, wird angefragt, in welcher Form das Investitionskapital für die Weiterentwicklung vom Investor IFM Global Infrastructure Fund (über die an der Flughafen Wien AG beteiligte Airports Group Europe s.à r.l.) kommt, gekommen ist oder kommen soll?

2. Zu der oben angeführten Aussage, dass im Zuge des Verfahrens die Antragstellerin die Eigentümerstruktur offengelegt habe und kein Grund bestehe, die Investition zu untersagen:

2.1. Wer sind nun die Eigentümer des Investors und zwar im Sinne der letztlich wirtschaftlich Berechtigten?

2.2. Wer ist an dem Feeder Funds IFM Global Infrastructure (Offshore), L.P. auf den Cayman Islands beteiligt und somit Eigentümer und wirtschaftlich Berechtigter dieses Unternehmens und in weiterer Folge des am Flughafen Wien investierten IFM Global Infrastructure Fund?

- 2.3. Können Sie mit Sicherheit die Möglichkeit ausschließen, dass Teile des in die Aktien der Flughafen Wien AG investierten und noch zu investierenden Geldes aus russischen Quellen stammen?
- 2.4. Können Sie mit Sicherheit die Möglichkeit ausschließen, dass Teile der von der Flughafen Wien AG ausgeschütteten Dividenden russischen Investoren und somit allenfalls sogar der Kriegsfinanzierung zugutekommen?
- 2.5. Welche konkreten Personen sind die Entscheidungsträger in der Struktur? IFM Investors Pty Limited sind ja nur Berater. Anders gefragt: Wer sind die Hintermänner (-und frauen), in deren Auftrag der Berater IFM Investors Pty Limited tätig ist? Können Sie die Personen namentlich nennen?
3. Wenn die in den vorangegangenen Punkten gestellten Fragen nicht klar, vollständig und im Sinne eines Risikoausschlusses beantwortet werden können, stellt sich die abschließende Frage zu der oben angeführten Aussage in der Presseaussendung, im Verfahren nach dem Investitionskontrollgesetz würde festgestellt werden, ob die Sicherheit und öffentliche Ordnung Österreichs gewahrt bleiben:

Wie können Sie gewährleisten, dass die Sicherheit und öffentliche Ordnung gewahrt bleiben, insbesondere, dass eine Unterwanderung der EU-Sanktionen als Maßnahme gegen den Angriffskrieg gegen die Ukraine verlässlich ausgeschlossen werden kann, wenn Sie nicht mit Sicherheit sagen können, wer diesen karibischen Fonds nun wirklich kontrolliert und wessen Gelder von ihm am Flughafen Wien investiert werden?

Es wird ersucht, die Fragen einzeln zu beantworten.

Beilagenliste:

Beilage ./1: Auszug aus dem von IFM Investors Pty Limited ausgefüllten ADV-Form der SEC (S. 1 sowie 46-61)

Beilage ./2: Search Report (Suchbericht) vom 03.02.2023 aus dem Firmenregister der Cayman Islands zum Feeder Fund IFM Global Infrastructure (Offshore), L.P.

Beilage ./3: Search Report (Suchbericht) vom 11.10.2022 aus dem Firmenregister der Cayman Islands zum IFM Global Infrastructure Fund (Cayman Islands)

Beilage ./4: „Guardian“ vom 02.03.2022 mit dem Titel “AustralianSuper’s \$300m of Russian investments plunge as sanctions bite”

EXTRACT FROM:
Form ADV, 28.09.2022,
IFM INVESTORS PTY LTD
p. 1, 46-61

FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: IFM INVESTORS PTY LTD

CRD Number: 162754

Annual Amendment - All Sections

Rev. 10/2019

28/2022 6:22:53 PM

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

Your full legal name (if you are a sole proprietor, your last, first, and middle names):

IFM INVESTORS PTY LTD

(1) Name under which you primarily conduct your advisory business, if different from Item 1.A.

IFM INVESTORS PTY LTD

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box ☐

If you check this box, complete a Schedule R for each relying adviser.

If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of

☐ your legal name or ☐ your primary business name:

(1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-78649**

(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

No Information Filed

(1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: **162754**

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional CRD Numbers, your additional CRD numbers:

No Information Filed

Principal Office and Place of Business

(1) Address (do not use a P.O. Box):

Number and Street 1:

LEVEL 29, 2 LONSDALE STREET

City:

MELBOURNE

State:

Number and Street 2:

Country:

Australia

ZIP+4/Postal Code:

3000

If this address is a private residence, check this box: ☐

List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.

(2) Days of week that you normally conduct business at your principal office and place of business:

☒ Monday - Friday ☐ Other:

Normal business hours at this location:

9 A.M. - 6 P.M.

(3) Telephone number at this location:

61 3 8672 5300

(4) Facsimile number at this location, if any:

61 3 8672 5306

(5) What is the total number of offices, other than your principal office and place of business, at which you conduct investment advisory business as of

(f) Does the marketer market the *private fund* through one or more websites?

(g) If the answer to question 28.(f) is "yes," list the website address(es):

No Information Filed

4. PRIVATE FUND

Information About the *Private Fund*

1. (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE FUND

(b) *Private fund* identification number:

(Include the "805-" prefix also)

805-9331495362

2. Under the laws of what state or country is the *private fund* organized:

State:

Country:

Cayman Islands

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director

CONYERS TRUST COMPANY (CAYMAN) LIMITED

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Other - CAYMAN ISLANDS/CAYMAN ISLANDS MONETARY AUTHORITY

Yes No

6. (a) Is this a "master fund" in a master-feeder arrangement?

Yes No

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

Name of <i>private fund</i>	<i>Private fund</i> identification number
IFM GLOBAL INFRASTRUCTURE (AUSTRALIA) TRUST	805-7547462455
IFM GLOBAL INFRASTRUCTURE (CANADA) B, L.P.	805-7972180462
IFM GLOBAL INFRASTRUCTURE (CANADA) I-A, L.P.	805-5666140727
IFM GLOBAL INFRASTRUCTURE (CANADA), L.P.	805-5854985767
IFM GLOBAL INFRASTRUCTURE (OFFSHORE), L.P.	805-9903279061
IFM GLOBAL INFRASTRUCTURE (UK) B, L.P.	805-2678541527
IFM GLOBAL INFRASTRUCTURE (UK) C, L.P.	805-5407918809
IFM GLOBAL INFRASTRUCTURE (UK) ESPS, L.P.	805-9908343140
IFM GLOBAL INFRASTRUCTURE (UK) GBP, L.P.	805-1999028121
IFM GLOBAL INFRASTRUCTURE (UK) ILIM, LP	805-4841358831
IFM GLOBAL INFRASTRUCTURE (UK), L.P.	805-4903183608
IFM GLOBAL INFRASTRUCTURE (US) I-A, L.P.	805-7861446726
IFM GLOBAL INFRASTRUCTURE (US) I-B, L.P.	805-9794488091
IFM GLOBAL INFRASTRUCTURE (US), L.P.	805-8512150812
IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND	805-2432997632
IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND 2	805-7889753840
IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND 4	805-1400406827

Yes No

(c) Is this a "feeder fund" in a master-feeder arrangement?

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

Private fund identification number:
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

Additional Feeder Fund Information : 17 Record(s) Filed.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (AUSTRALIA) TRUST

(b) *Private fund* identification number:
(include the "805-" prefix also)

805-7547462455

(c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Australia

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM INVESTORS (NOMINEES) LIMITED

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

(e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

(f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Other - AUSTRALIAN PRUDENTIAL REGULATORY AUTHORITY

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (CANADA) B, L.P.

(b) *Private fund* identification number:
(include the "805-" prefix also)

805-7972180462

(c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Canada

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (CANADA) GP INC.

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (CANADA) I-A, L.P.

- (b) *Private fund* identification number:

(include the "805-" prefix also)

805-5666140727

- (c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Canada

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (CANADA) GP INC.

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (CANADA), L.P.

- (b) *Private fund* identification number:

(include the "805-" prefix also)

805-5854985767

- (c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Canada

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (CANADA) GP INC.

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (OFFSHORE), L.P.

- (b) *Private fund* identification number:

(include the "805-" prefix also)

805-9903279061

- (c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Cayman Islands

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (US) GP, LLC

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Other - CAYMAN ISLANDS MONETARY AUTHORITY

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (UK) B, L.P.

- (b) *Private fund* identification number:

(include the "805-" prefix also)
805-2678541527

- (c) Under the laws of what state or country is the *private fund* organized:

State: Country:
United Kingdom

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (UK) C, L.P.

- (b) *Private fund* identification number:

(include the "805-" prefix also)

805-5407918809

- (c) Under the laws of what state or country is the *private fund* organized:

State: Country:
United Kingdom

- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP

- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

- (e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (UK) ESPS, L.P.

- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-9908343140
- (c) Under the laws of what state or country is the *private fund* organized:
State: Country:
United Kingdom
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):
Name of General Partner, Manager, Trustee or Director
IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:
IFM GLOBAL INFRASTRUCTURE (UK) GBP, L.P.
- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-1999028121
- (c) Under the laws of what state or country is the *private fund* organized:
State: Country:
United Kingdom
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):
Name of General Partner, Manager, Trustee or Director
IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:
IFM GLOBAL INFRASTRUCTURE (UK) ILIM, LP
- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-4841358831
- (c) Under the laws of what state or country is the *private fund* organized:
State: Country:
United Kingdom
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):
Name of General Partner, Manager, Trustee or Director
IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:
IFM GLOBAL INFRASTRUCTURE (UK), L.P.
- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-4903183608
- (c) Under the laws of what state or country is the *private fund* organized:
State: Country:
United Kingdom
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or persons serving in a similar capacity):
Name of General Partner, Manager, Trustee or Director
IFM INFRASTRUCTURE (UK) GENERAL PARTNER, LLP
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (US) I-A, L.P.

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-7861446726

(c) Under the laws of what state or country is the *private fund* organized:

State:

Delaware

Country:

United States

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (US) GP, LLC

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

(e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

(f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM GLOBAL INFRASTRUCTURE (US) I-B, L.P.

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-9794488091

(c) Under the laws of what state or country is the *private fund* organized:

State:

Delaware

Country:

United States

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM GLOBAL INFRASTRUCTURE (US) GP, LLC

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

(e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
- No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:
IFM GLOBAL INFRASTRUCTURE (US), L.P.
- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-8512150812
- (c) Under the laws of what state or country is the *private fund* organized:
State: Delaware Country: United States
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):
- | Name of General Partner, Manager, Trustee or Director |
|---|
| IFM GLOBAL INFRASTRUCTURE (US) GP, LLC |
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- (f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

- (a) Name of the *private fund*:
IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND
- (b) *Private fund* identification number:
(include the "805-" prefix also)
805-2432997632
- (c) Under the laws of what state or country is the *private fund* organized:
State: Country: Australia
- (d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):
- | Name of General Partner, Manager, Trustee or Director |
|---|
| IFM INVESTORS (NOMINEES) LIMITED |
- (d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:
No Information Filed
- (e) The *private fund* (check all that apply; you must check at least one):
☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

(f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Other - AUSTRALIAN PRUDENTIAL REGULATORY AUTHORITY

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND 2

(b) *Private fund* identification number:
(include the "805-" prefix also)

805-7889753840

(c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Australia

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM INVESTORS (NOMINEES) LIMITED

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

(e) The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

(f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

(a) Name of the *private fund*:

IFM INTERNATIONAL INFRASTRUCTURE WHOLESALE FUND 4

(b) *Private fund* identification number:
(include the "805-" prefix also)

805-1400406827

(c) Under the laws of what state or country is the *private fund* organized:

State:

Country:

Australia

(d) (1) Name(s) of General Partner, Manager, Trustee or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee or Director

IFM INVESTORS (NOMINEES) LIMITED

(d) (2) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*:

No Information Filed

(e) The *private fund* (check all that apply; you must check at least one):

- ☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
- ☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

(f) List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Australia - Australian Securities and Investments Commission

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

8. (a) Is this *private fund* a "fund of funds"?

Yes No

☐ ☒

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

☐ ☐

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?

Yes No

☐ ☒

10. What type of fund is the *private fund*?

☒ hedge fund ☐ liquidity fund ☐ private equity fund ☐ real estate fund ☐ securitized asset fund ☐ venture capital fund ☐ Other *private fund*:

NOTE: For definitions of these fund types, please see instruction 6 of the Instructions to Part 1A.

11. Current gross asset value of the *private fund*:

\$ 55,452,154,893

Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 10,000,000

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).

13. Approximate number of the *private fund's* beneficial owners:

672

14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%

15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the *private fund* qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?

☐ ☐

16. What is the approximate percentage of the *private fund* beneficially owned by non-United States persons:

71%

Your Advisory Services

17. (a) Are you a subadviser to this *private fund*?

Yes No

☐ ☒

(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the *private fund*. If the answer to question 17.(a) is "no," leave this question blank.

No Information Filed

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the *private fund*? Yes No
☒ ☐
- (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the *private fund*. If the answer to question 18.(a) is "no," leave this question blank.

Name of Other Adviser to private fund	SEC file number	CRD number
IFM INVESTORS (UK) LIMITED		
IFM INVESTORS (US) ADVISOR, LLC	801-69597	146366

19. Are your *clients* solicited to invest in the *private fund*? Yes No
☒ ☐
- NOTE: For purposes of this question, do not consider feeder funds of the *private fund*.

20. Approximately what percentage of your *clients* has invested in the *private fund*?
15%

Private Offering

21. Has the *private fund* ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? Yes No
☒ ☐
22. If yes, provide the *private fund's* Form D file number (if any):

Form D file number
021-126507
021-189944
021-324908

3. SERVICE PROVIDERS

Auditors

23. (a) (1) Are the *private fund's* financial statements subject to an annual audit? Yes No
☒ ☐
- (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? Yes No
☒ ☐
- If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

Additional Auditor Information : 1 Record(s) Filed.

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the *private fund* uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.

(b) Name of the auditing firm:
DELOITTE & TOUCHE

(c) The location of the auditing firm's office responsible for the *private fund's* audit (city, state and country):
City: GEORGE TOWN State: Country: Cayman Islands

(d) Is the auditing firm an *independent public accountant*? Yes No
☒ ☐

(e) Is the auditing firm registered with the Public Company Accounting Oversight Board? Yes No
☒ ☐

If yes, Public Company Accounting Oversight Board-Assigned Number:
1096

(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes No
☒ ☐

- (g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors? Yes No
☒ ☐
- (h) Do all of the reports prepared by the auditing firm for the *private fund* since your last *annual updating amendment* contain unqualified opinions? Yes No
☒ ☐

☒ Yes ☐ No ☐ Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

Prime Broker

Yes No

24. (a) Does the *private fund* use one or more prime brokers?

☐ ☒

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

Custodian

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

☒ ☐

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

Additional Custodian Information : 1 Record(s) Filed.

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:
JPMORGAN CHASE BANK, N.A.

(c) Primary business name of custodian:
JPMORGAN CHASE BANK, N.A.

(d) The location of the custodian's office responsible for custody of the *private fund's* assets (city, state and country):

City:
NEW YORK

State:
New York

Country:
United States

Yes No

(e) Is the custodian a *related person* of your firm?

☐ ☒

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):

CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

Administrator

Yes No

26. (a) Does the *private fund* use an administrator other than your firm?

☐ ☒

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

No Information Filed

27. During your last fiscal year, what percentage of the *private fund's* assets (by value) was valued by a *person*, such as an administrator, that is not your *related person*?

100%

Include only those assets where (i) such *person* carried out the valuation procedure established for that asset, if any, including obtaining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including allocations) was the valuation determined by such *person*.

Marketers

Yes No

28. (a) Does the *private fund* use the services of someone other than you or your *employees* for marketing purposes?

☒ ☐

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer you must complete questions (b) through (g) separately for each marketer.

Additional Marketer Information : 5 Record(s) Filed.

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.

Yes No

- (b) Is the marketer a *related person* of your firm?

☒ ☐

- (c) Name of the marketer:
IFM (US) SECURITIES, LLC

- (d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-):
8 - 69201
and CRD Number (if any):
166325

- (e) Location of the marketer's office used principally by the *private fund* (city, state and country):

City:	State:	Country:
NEW YORK	New York	United States

Yes No

- (f) Does the marketer market the *private fund* through one or more websites?

☐ ☒

- (g) If the answer to question 28.(f) is "yes," list the website address(es):

No Information Filed

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar *person*. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.

Yes No

- (b) Is the marketer a *related person* of your firm?

☒ ☐

- (c) Name of the marketer:
IFM INVESTORS (JAPAN) PTY LTD

- (d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-):
-
and CRD Number (if any):

- (e) Location of the marketer's office used principally by the *private fund* (city, state and country):

City:	State:	Country:
TOKYO		Japan

Yes No

- (f) Does the marketer market the *private fund* through one or more websites?

☐ ☒

- (g) If the answer to question 28.(f) is "yes," list the website address(es):

No Information Filed

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor,

or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.

	Yes No
(b) Is the marketer a <i>related person</i> of your firm?	<input checked="" type="radio"/> <input type="radio"/>
(c) Name of the marketer: IFM INVESTORS (NETHERLANDS) B.V.	
(d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-): -	
and CRD Number (if any):	
(e) Location of the marketer's office used principally by the <i>private fund</i> (city, state and country):	
City: AMSTERDAM	State: Country: Netherlands
(f) Does the marketer market the <i>private fund</i> through one or more websites?	<input type="radio"/> <input checked="" type="radio"/>
(g) If the answer to question 28.(f) is "yes," list the website address(es): No Information Filed	

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.

	Yes No
(b) Is the marketer a <i>related person</i> of your firm?	<input checked="" type="radio"/> <input type="radio"/>
(c) Name of the marketer: IFM INVESTORS (SWITZERLAND) GMBH	
(d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-): -	
and CRD Number (if any):	
(e) Location of the marketer's office used principally by the <i>private fund</i> (city, state and country):	
City: ZURICH	State: Country: Switzerland
(f) Does the marketer market the <i>private fund</i> through one or more websites?	<input type="radio"/> <input checked="" type="radio"/>
(g) If the answer to question 28.(f) is "yes," list the website address(es): No Information Filed	

You must answer "yes" whether the *person* acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar person. If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the *private fund* uses. If the *private fund* uses more than one marketer, you must complete questions (b) through (g) separately for each marketer.

	Yes No
(b) Is the marketer a <i>related person</i> of your firm?	<input checked="" type="radio"/> <input type="radio"/>
(c) Name of the marketer: IFM INVESTORS (UK) LIMITED	
(d) If the marketer is registered with the SEC, its file number (e.g., 801-, 8-, or 866-):	

and CRD Number (if any):

(e) Location of the marketer's office used principally by the *private fund* (city, state and country):

City: LONDON State: Country: United Kingdom

(f) Does the marketer market the *private fund* through one or more websites? Yes No
☐ ☒

(g) If the answer to question 28.(f) is "yes," list the website address(es):
No Information Filed

4. PRIVATE FUND

Information About the Private Fund

1. (a) Name of the *private fund*:
IFM NET ZERO INFRASTRUCTURE FUND SCSP

(b) *Private fund* identification number:
(include the "805-" prefix also)
805-3149359563

2. Under the laws of what state or country is the *private fund* organized:

State: Country: Luxembourg

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

Name of General Partner, Manager, Trustee, or Director
IFM NET ZERO INFRASTRUCTURE GP S.À R.L.

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.
No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.
No Information Filed

6. (a) Is this a "master fund" in a master-feeder arrangement? Yes No
☒ ☐

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

Name of private fund	Private fund identification number
IFM NET ZERO INFRASTRUCTURE FUND (AWUT) A	805-7356947402
IFM NET ZERO INFRASTRUCTURE FUND (USD) B, SCSP	805-9372838193

(c) Is this a "feeder fund" in a master-feeder arrangement? Yes No
☐ ☒

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

Private fund identification number:
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.



Search Report

Entity Name :	IFM Global Infrastructure (Offshore), L.P.
Jurisdiction :	Cayman Islands
Registration Number :	50103
Registration Date :	04th August 2011
Entity Type :	EXEMPTED LIMITED
Registered Office :	CONYERS TRUST COMPANY (CAYMAN) LIMITED P. O. Box 2681 CRICKET SQUARE, HUTCHINS DRIVE, GEORGE TOWN GRAND CAYMAN CAYMAN ISLANDS
Initial Subscriber:	
Authorised Share Capital:	CIS
Nature of Business:	Equity Holding Company
Financial Year End:	

Status :	ACTIVE
Status Date :	04th August 2011

-
- INFORMATION REGARDING THE CORPORATE RECORDS AND REGISTERS ARE NOT AVAILABLE FOR PUBLIC INSPECTION
 - THIS REPORT DOES NOT CONFIRM THE ENTITY IS IN GOOD STANDING

Authorisation Code : 803300482152
www.verify.gov.ky
03 February 2023



Search Report

Entity Name :	IFM Global Infrastructure Fund
Jurisdiction :	Cayman Islands
Registration Number :	52727
Registration Date :	21st December 2007
Entity Type :	Trust
Registered Office :	CONYERS TRUST COMPANY (CAYMAN) LIMITED P. O. Box 2681 CRICKET SQUARE, HUTCHINS DRIVE, GEORGE TOWN GRAND CAYMAN CAYMAN ISLANDS

Status :	ACTIVE
Status Date :	20th December 2007

- INFORMATION REGARDING THE CORPORATE RECORDS AND REGISTERS ARE NOT AVAILABLE FOR PUBLIC INSPECTION
- THIS REPORT DOES NOT CONFIRM THE ENTITY IS IN GOOD STANDING

Authorisation Code : 565874790597
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11 October 2022

**Business**

🕒 This article is more than 1 year old

AustralianSuper's \$300m of Russian investments plunge as sanctions bite

Australia's biggest super fund yet to decide if it will join investors dumping Russian shares following Ukraine invasion

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Ben Butler

Wed 2 Mar 2022 16.30 GMT

The value of Russian investments held by Australia's biggest super fund, AustralianSuper, has plummeted as sanctions and economic panic following the invasion of Ukraine ravage what was a \$300m portfolio.

On Wednesday afternoon AustralianSuper, which has assets of about \$245bn and looks after the retirement savings of 2.5 million people, had yet to decide whether to join other Australian funds in dumping Russian stocks.

However, a dramatic collapse in the share price of Russia's biggest bank, Sberbank, which is subject to sanctions by the US and UK, has already torn a \$137m hole in the value of Aussie Super's Russian investments.

More Australian and international corporate players moved to distance themselves from Russia on Wednesday, with ExxonMobil **announcing** it would "discontinue operations" and exit the Sakhalin-1 oil and gas field it operates in Russia's far east, and consumer brands Apple, Ford and Google halting sales in the country.

On Tuesday night, super funds Rest and Cbus **followed the lead** of \$130bn fund Aware, Australia's sovereign wealth fund the Future Fund, and the NSW state government in pledging to divest from Russian assets as soon as possible.

Both Rest and Cbus said Russian assets made up less than 0.1% of their total investment portfolios.

Hampering divestment efforts, Russia's central bank kept the Moscow stock exchange closed from Monday until at least Wednesday, making it impossible to sell shares listed there.

However, some Russian companies have secondary listings elsewhere.

This includes Sberbank, which is listed on the London exchange.

The price of Sberbank securities listed in London collapsed from US\$15.65 in December, when Aussie listed its holding as worth almost \$140m, to as little as US21c on Tuesday after new US sanctions obliterated its European business.

At that price, Aussie's stake in Sberbank is now worth as little as \$1.8m.

AustralianSuper declined to comment but it is believed the fund is considering whether dumping its Russian portfolio would be in the best financial interests of members - the test managers must meet following changes to super law introduced by the treasurer, Josh Frydenberg, last year.

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Julien Vincent, the executive director of activist investor group Market Forces, said AustralianSuper's members would be "rightly appalled to learn their super fund has been invested in companies driving the Russian invasion of Ukraine".

"Silence from a fund that claims to be a leader on issues of corporate responsibility, especially when others are providing at least a mea culpa on their investments in Russian oil and gas, is an abject failure of leadership."

He questioned why AustralianSuper held shares in Russian fossil fuel companies in the first place.

Research by Guardian Australia shows that Aussie's Russian assets include shares and bonds issued by the world's biggest natural gas company, Gazprom, that are valued on the fund's books at \$3.7m, as well as shares in oil company Rosneft valued at \$24.7m.

Shares in Rosneft are likely to tumble in value if trade resumes on the Moscow exchange because oil multinational BP has **promised to sell** its 19.7% stake in the group.

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In other developments, a representative of Russian oligarch Viktor Vekselberg, who is under sanction by the US and UK, quit the board of Falcon Oil & Gas, a company that is **in joint venture with Australia's Origin Energy** to develop a gas field in the Beetaloo Basin.

Vekselberg is Falcon's biggest shareholder, owning 16% of the company through his investment vehicle Lamesa Holdings.

Activist investor group the Australasian Centre for Corporate Responsibility dismissed the resignation of Vekselberg's representative, Maxim Mayolets, as "window dressing".

"Vekselberg stands to personally benefit from any successful exploration that Origin is conducting in the Beetaloo Basin," the ACCR's director of climate and environment, Dan Gocher, said.

"Origin has little choice but to suspend its joint venture with Falcon Oil & Gas until such time as Viktor Vekselberg's interests in the company are resolved."

Meanwhile, IFM Investors, a group through which industry super funds make investments into things such as airports, toll roads and the like, said it had "no direct investors nor investments that are included on relevant global sanctions lists".

"IFM has no direct exposure to Russia through its infrastructure, debt and private equity portfolios," it said.

"IFM does have a global listed equities indexing capability, where it manages money indexed to the MSCI All Country Index, which includes very limited exposure to Russia."

MSCI is reported to be considering dropping Russian stocks from its indexes after declaring the Moscow market "**uninvestable**".

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