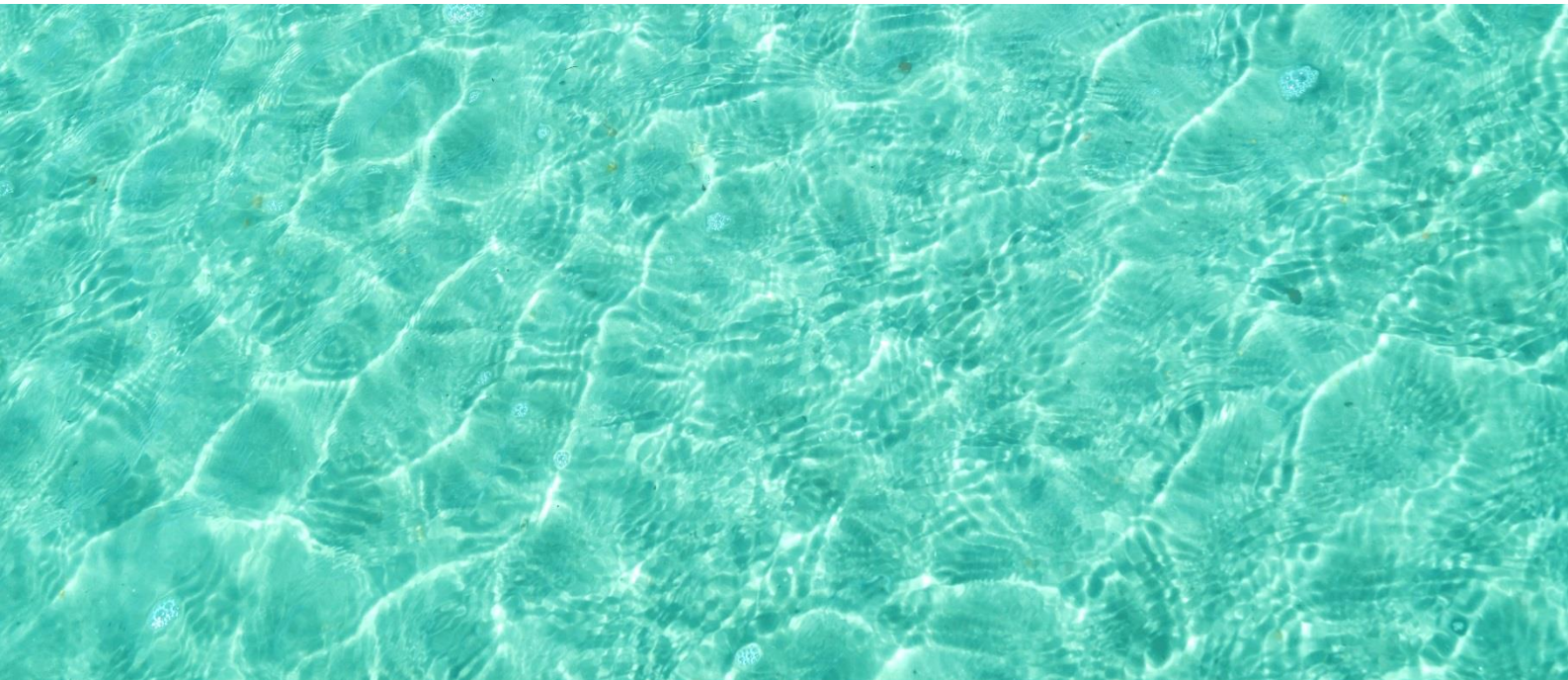




Financial Services Guide

Version 9.00 – July 2017



Financial Services Guide

Important Information

This Financial Services Guide (“FSG”) has been prepared by Amalgamated Australian Investment Solutions Pty Ltd (“AAIS”) (AFSL: 314 614. ABN: 61 123 680 106) and is distributed with consent by Atlantic Pacific Securities Pty Limited trading as ASR Wealth Advisers (“ASR Wealth Advisers”) (ABN: 72 135 187 085). APSEC is a Corporate Authorised Representative of AAIS.

As an AFSL holder, AAIS is required to provide you with important information to assist you as you consider whether to use our financial services. We are also required to provide you with an understanding of what you can expect from a relationship with AAIS and any of its Corporate Authorised Representatives / Authorised Representatives.

The purpose of this FSG is to:

- Explain who we are and how we can be contacted;
- Ensure you receive important information about the type of financial services we are authorised to provide to you;
- Assist you in deciding whether to use any of the financial services we are authorised to provide to you;
- Provide you with information about the remuneration we may receive in relation to the financial services offered;
- Explain how we (and other relevant parties) are remunerated; and
- Outline how we will handle any complaints received.

If you choose to trade in any financial product offered by ASR Wealth Advisers, you may also receive other important documents, such as a Product Disclosure Statement (“PDS”) or an FSG from one of our trading platform provider partners. A PDS contains important information to assist you to make a decision about the specific product. The PDS and / or offer document contains key features of the proposed product, significant benefits, risks and the fees you pay the product provider to professionally manage your investment.

You should read any warning contained in a PDS or offer document carefully before making any decision in relation to a financial strategy or product.

About ASR Wealth Advisers

ASR Wealth Advisers only provides general financial product advice and arranges for the execution of trades in securities, foreign exchange products and derivatives including, exchange traded options, futures and CFDs to retail and wholesale clients.

AAIS and ASR Wealth Advisers are wholly owned by the Amalgamated Australian Investment Group Limited (ABN 81 140 208 288) (“AAIG”). Other related companies operating within AAIG include: Australian Stock Report Pty Limited (ABN 94 106 863 978. AFSL 301 682), HC Securities Pty Limited (ABN: 78 117 830 805. CAR 297 316), Ascot Securities Pty Ltd (ABN 45 075 902 206. AFSL 246 718), Australian Investment and Insurance Group Pty Ltd (ABN 93 068 486 126. AFSL 226 405), APSEC Compliance and Administration Pty Limited (ABN 30 152 440 723) and APSEC Funds Management Pty Ltd (ABN 48 152 440 723. CAR 411 859).

Our financial services and products

AAIS Authorised Representatives are authorised to provide general financial product advice on, and to deal in the following financial products:

- Basic deposit products;
- Debentures, stocks or bonds issued or proposed to be issued by a government;
- Securities (including shares);
- Derivatives (including Exchange Traded Options (ETOs), Futures, Contracts for Difference (CFDs));
- Foreign exchange; and
- Standard margin lending facilities.

Before acting on any information or general advice you receive, you should consider the appropriateness of the advice and suitability of the relevant product having regard to your individual objectives, financial situation, risk tolerance, experience and needs. You should seek independent financial advice from a person qualified to provide personal advice and read the relevant PDS or other offer document prior to making any investment decision.

Please note that not all ASR Wealth Advisers employees will be authorised to deal or advise in all financial products listed above. For example, if you are seeking general advice about dealing in ETOs or CFDs and the Adviser you are speaking with is not authorised to provide such advice, you may be referred to another Adviser who is properly authorised and competent to provide you with general advice in derivatives.

General advice in relation to managed investments is restricted to products managed by ASR Funds Management Pty Ltd which is a related entity.

ASR Wealth Advisers acts as agent when dealing on behalf of its clients.

About general advice

Any investment advice we provide to you in relation to services offered or specific financial products will be general in nature and will be prepared without taking account of your individual investment objectives, financial situation or needs. Accordingly, before acting on any advice, you should consider the appropriateness of it, and the relevant product, in regards to your objectives, financial situation and needs. In addition to this FSG, you may receive other documents from us. If we propose that you invest in or purchase any particular financial products, we will provide you with or refer you to a PDS or private offer document, if one is available. The PDS contains information about the product to assist you in making an informed decision about that product. It will outline relevant terms, significant risks (where such exist), fees and charges associated with the product. You should read any warnings contained in the PDS or offer document carefully before making any decision relating to a financial strategy or product. You should also seek independent personal financial advice and read the relevant PDS or other offer document prior to acquiring a financial product.

General advice in relation to managed investments is restricted to products managed by APSEC Funds Management Pty Ltd which is a related entity.

You should conduct your own research into competing managed investment products.

Remuneration and benefits we receive

ASR Wealth Advisers may charge fees for the services we provide or facilitate. These fees may be charged in various ways which may include, but may not be limited to:

- Brokerage on trades executed via one of trading platform service partners;
- Administration fees;
- Subscription or service fees;
- Asset-based fees; and
- Other benefits that are paid with your consent.

If you invest in a financial product through ASR Wealth Advisers, we may receive benefits based on the value of your holdings, and the total value of AAIS' client holdings from the product issuer, where permitted by law. These benefits may include upfront fees, management fees (which includes transaction, ongoing and, if applicable, any borrowing costs) and / or brokerage. In specific instances, exit fees, account fees and transaction fees may also apply. Where you place funds in our trust account, we will retain the interest earned on any trust account balances.

By electing to use our services, you consent, authorise and direct AAIS to receive brokerage fees and to pass on a percentage of those fees to our advisers as described below. Brokerage fees constitute a fee given by you to AAIS, ASR Wealth Advisers and its advisers, for the services that ASR Wealth Advisers and its advisers provide to you. ASR Wealth Advisers and its advisers will only vary any percentage-based brokerage fees with your prior consent.

Brokerage

Brokerage is a fee given by you to us, in exchange for the dealing service we provide to you. We pass on some of that fee to the Service Providers. ASR Wealth Advisers receives brokerage fees when you trade through us via one of our Service Providers.

- **Securities transactions** - The brokerage fee charged in each transaction will be the greater of 1% of the trade amount or \$100 inclusive of GST unless otherwise stated. When you buy or sell financial products, brokerage is added to the purchase price of a buy transaction and is deducted from the proceeds of a sell transaction. Brokerage is settled on T+2 (being two Business Days after the trade date) for share transactions.

- **ETO transactions** – When you open or close an ETO position you will be charged a flat fee of \$0 to \$100 (including GST) or a percentage which may range between 0% to 1.1% on each leg (transaction) unless otherwise stated.

ETOs are complex, high risk products and you may lose more than your initial investment. You are responsible for only investing in products that you understand and that are suitable for your investment needs.

- **CFDs** – commission will be based on the full notional value of the CFD and expressed as a percentage of the contract value with a minimum charge. Interest charges may also be payable on long and short CFD positions.

CFDs are considered high risk products. Most CFD products are leveraged which means that actual exposure exceeds your initial investment. In fact, your total trade exposure may be many times greater than your initial investment which means you may lose more than your initial investment. CFDs are not suitable for all investors and you are responsible for ensuring that you only trade in products that you understand and that are suitable for your investment needs.

Please refer to the detailed Fee Schedule of the relevant platform provider for further information.

AAIS - Licensee

AAIS receives all brokerage and commission generated by ASR Wealth Advisers and your authorised representative. AAIS transfers these amounts in full to ASR Wealth Advisers. ASR Wealth Advisers remunerates AAIS by a set monthly licensee fee as agreed between the parties.

Atlantic Pacific Securities Pty Ltd trading as ASR Wealth Advisers – Corporate Authorised Representative

Directors, employees and contractors are remunerated by way of set salaries and contract fees. Directors, employees and contractors may receive bonuses based on overall company, team and personal performance.

Authorised Representatives may receive up to 50% of any brokerage that we receive. They may also receive a commission of up to 1% for any monies invested in a managed fund. Your authorised representative may share their remuneration with another authorised representative. They may also receive bonuses based on overall company, team and personal performance at Management Discretion. Neither AAIS nor ASR Wealth Advisers will vary any brokerage or any fee from what you have agreed to without your prior consent.

Other benefits we may receive

Service Providers – Trading Platforms

AAIS has introducing broker arrangements with various trading platforms offering broking services. AAIS is charged a transaction fee by the service provider for every trade executed on their platform. Transaction fees and administrative charges may be charged and change over time so please to refer to the FSG / Fee Schedule of the relevant service provider for further details in this regard.

Product arrangements - We have commercial arrangements in place with various product and / or service providers to enable us to execute transactions and provide financial services on your behalf. This does not affect any of your rights and obligations that you have with ASR Wealth Advisers.

AAIS may offer you financial products issued by its associates or third parties such as banks, brokers and AFSL holders. AAIS may earn brokerage and other fees at a rate of 1% to 100% of the fee revenue charged by the relevant entity.

External Specialist fees - With your permission you may be referred to an external specialist to receive further advice. We may receive a referral fee or commission for introducing you to the specialist. AAIS, ASR Wealth Advisers and other Authorised Representatives neither accept liability nor endorse products or services provided by external providers.

The amount of the referral fee will be calculated depending on the type of service that is referred, and is generally a percentage of the value of the services referred during a set period of time. You can request particulars of the amount within a reasonable time after the FSG is given and before any financial services are provided to you.

Payments to other professionals - We may pay a referral fee when clients are referred to us from other professionals. The amount of the referral fee is calculated depending on the type of service that is referred, and is generally a percentage of the value of the services referred during a set period of time. You can request particulars of the amount within a reasonable time after the FSG is given and before any financial services are provided to you.

Alternative Remuneration - Any other form of remuneration, such as gifts, entertainment or sponsorship, are recorded by AAIS on a central register. A copy of this register will be made available within seven days of a request.

How you may provide instructions to us

Generally, you may give us instructions either by telephone or in writing (mail, fax, e-mail or SMS) in relation to any of our services and transactions for execution. However, the method by which you provide instructions will vary depending on what type of service and what external trading platform you opt to use.

We reserve the right to request written instructions from you relating to the subject matter of your instructions where necessary and where subject to the terms and conditions of any applicable agreement with you.

ASR Wealth Advisers offers a text-to-trade service which requires clients to enter into a contractual agreement. If you would like to participate in our text-to-trade service, please speak with your Adviser and we can arrange for the various terms and conditions and agreement to be sent to you.

Our Contact Details

ASR Wealth Advisers

Address: Level 4, 151 Castlereagh Street, Sydney NSW 2000
Phone: (02) 8356 9356
Fax: (02) 9264 4954
Web: www.asrw.com.au

Amalgamated Australian Investment Solutions Pty Limited

Address: Level 4, 151 Castlereagh Street, Sydney NSW 2000
Phone : (02) 8356 9356
Fax : (02) 9264 4954

Professional Indemnity Insurance

AAIS holds a professional indemnity insurance policy that satisfies the regulatory requirements for compensation arrangements under Section 912B of the Corporations Act. Subject to the terms and conditions, the arrangements provide cover for civil liability resulting from third-party claims concerning the professional services provided by ASR Wealth Advisers and its employees and representatives.

Best Execution

When you trade through ASR Wealth Advisers, in conjunction with our Service Provider partners, we will always seek to achieve the best outcome for you when handling and executing your orders. Please refer to the Best Execution Policies of our Service Providers for further detail as to how they ensure the best outcome for you.

What should you do if you have a complaint?

If you have any complaints about the services provided to you, you should take the following steps:

- Contact your Adviser in the first instance and attempt to have the matter resolved;
- If your concern / complaint is not able to be satisfactorily resolved, please contact ASR Wealth Advisers on (02) 8356 9356 and ask for the Compliance Manager;
- You may also opt to put your complaint in writing and send it to:

ASR Wealth Advisers
Att: Compliance Manager
Level 4, 151 Castlereagh Street
Sydney NSW 2000

- ASR Wealth Advisers will do its best to try to resolve your complaint quickly and fairly.

If your complaint is not resolved to your satisfaction, you have the right to lodge any complaint that relates to financial advice, investments, superannuation or insurance matters with:

Financial Ombudsman Service (FOS)
GPO Box 3
Melbourne VIC 3001
T: 1800 367 287
www.fos.org.au

The Australian Securities and Investments Commission (ASIC) may also be contacted on 1300 300 630.

Privacy Statement

What does privacy mean for me?

Privacy is important to Amalgamated Australian Investment Solutions Pty Limited (“AAIS”, “we”, “our”, “us”) and to our clients. AAIS and its advisers are committed to comply with the Privacy Act 1988. This Statement ensures that you understand:

- The types of personal information AAIS may collect and hold;
- How AAIS uses personal information;
- How AAIS collects and holds personal information;
- Who AAIS discloses personal information to;
- How you can get access to the personal information AAIS holds about you;
- How you can correct your personal information; and
- How you can make a complaint.

What types of personal information about me does AAIS hold?

AAIS collects and holds information about you that is both relevant and necessary in order for us to provide you with financial advice and services. The information AAIS holds depends on the services provided and may include information about your identity, personal objectives, financial position, lifestyle and financial plan. You have the right to withhold personal information, but this may compromise the effectiveness of the services you receive.

AAIS will always endeavour to obtain your information directly from you.

How does AAIS use my personal information?

Our primary purpose in collecting your personal information is to provide you with general financial advice and dealing services.

We may also use your information to bring to your attention other services or products that may be of interest to you.

We may use or disclose personal information about you for the purpose of direct marketing if we collected the information from you and you would reasonably expect us to use your information for this purpose or you have consented to the use of your information for that purpose. If you would like to “opt out” of having your information used for direct marketing purposes or receiving updates about our products and services, please contact your Authorised Representative or AAIS.

How does AAIS collect and hold my personal information?

AAIS collects information about you that will usually be collected over the telephone, online or during face-to-face interviews. If AAIS collects personal information about you from someone other than you, AAIS will take reasonable steps to notify you of the purpose for which that information was collected, and the circumstances in which the information was collected.

AAIS takes reasonable steps to protect your information from misuse, interference and loss, and from unauthorised access, modification or disclosure. AAIS does this by securely storing information and make it inaccessible by unauthorised individuals. If AAIS holds your personal information and no longer needs it for any purpose for which the information may be used or disclosed, and the information is not contained in a Commonwealth record, and AAIS is not required by or under an Australian law, or a court/tribunal order to retain the information, then AAIS must take reasonable steps to destroy the information, or to ensure the information is de-identified.

Who does AAIS disclose my personal information to?

Your information is only disclosed to other parties as is necessary for us to provide our services to you. This is done only after we have received your written consent. Other parties may include internally owned companies and subsidiaries of the Amalgamated Australian Investment Group Ltd including other Licensees, related parties, accountants, trading platform providers, storage and emailing services as appropriate and with your permission.

In addition, we will disclose your information where we are required to by law.

We will not pass your information to other parties for any purposes other than those for which you have been informed.

AAIS may engage service providers located in countries outside Australia including India, Hong Kong, Singapore and the United States to assist in providing products or services. Disclosure of personal information to overseas providers may be required and will not be used for marketing purposes. AAIS does not sell client details and will not disclose your details to an external third party without your consent.

Another adviser may be appointed to you if your Adviser leaves or is unable to attend to your needs due to an extended absence from the business. In these circumstances, AAIS will contact you advising you of the change. Your personal information will be passed on to the new adviser.

How do I get access to the personal information AAIS holds about me?

You may request access to the information we hold about you by contacting your authorised representative or AAIS directly. A copy of any documents relating to you will be retained by AAIS for seven years. Upon receipt of your request we will endeavour to service your request as quickly as possible.

In some circumstances access to your information or parts thereof may not be possible. If this is the case we will inform you as to why and, where practicable, make alternative arrangements. Depending on the requirements a fee may be charged to service requests.

How do I correct any information held by AAIS?

AAIS will always endeavour to ensure that the personal information held by it is accurate, up to date and complete.

If AAIS is satisfied (or you advise AAIS) that the information held by it is inaccurate, incomplete, out of date, irrelevant or misleading, AAIS will take reasonable steps to correct the information. You may request that AAIS correct any information held by it. AAIS will endeavour to service your request as fully and as quickly as possible.

You may also request that we notify any third party to which we have previously disclosed your information of the correction.

How do I make a complaint?

If you have any queries or concerns about a breach or potential breach of this Privacy Policy, we invite you to take the following steps:

Contact your Authorized Representative to discuss your concerns or complaint:

Amalgamated Australian Investment Solutions Pty Limited

Att: Compliance Manager
Level 4, 151 Castlereagh Street
Sydney NSW 2000
T: (03) 8689 8714

If your complaint has not been satisfactorily resolved, you may escalate your it to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

Level 3, 175 Pitt Street
Sydney NSW 2000
T: 1300 363 992
www.oaic.gov.au
enquiries@oaic.gov.au

