



Financial Services Guide

**MerchantFX Pty Limited ABN 13 610 010 743
Corporate Authorised Representative (No. 1241758) of
Gleneagle Asset Management Limited ABN 29 103 162 278
Australian Financial Services Licence (No. 226199)**

Date: 1 December 2018

Details

This Financial Services Guide (**FSG**) is dated the 1 December 2018 and is issued to you by Gleneagle Asset Management Limited, (AFSL No 226199) (**GAML**).

It describes the financial services provided by its Corporate Authorised Representative, MerchantFX Pty Ltd ABN 13 610 010 743 (**Merchant FX**). GAML and Merchant FX are collectively referred to as (we, our, us).

What is the purpose of this Financial Services Guide?

The purpose of this FSG is to provide clients of GAML with key information about the financial services that are provided by GAML by its representative, Merchant FX. It is designed to give you information required to make an informed decision about whether to use those financial services. If you receive an electronic copy of this FSG, you should download or otherwise receive all of this FSG.

What this FSG contains

This FSG contains information about:

- who we are and how we can be contacted
- the services and types of products we are authorised to provide
- how we (and any other relevant parties) are remunerated
- internal and external dispute resolution procedures and how you can access them.

Who we are and how we can be contacted?

GAML is an Australian registered company whose head office is located at Level 27, 25 Bligh Street Sydney 2000. GAML holds an Australian Financial Services Licence (No. 226199) and is regulated by the Australian Securities and Investment Commission. GAML acts for itself.

MerchantFX Pty Ltd ABN 13 610 010 743 acts as the corporate authorised representative (No. 1241758) of GAML in a customer relationship role promoting Merchant FX Products and assisting with placing orders when it provides to you the services described in this FSG.

All of your regular contact in relation to Merchant FX Products should first be with Merchant FX.

If you have any queries about this FSG or the services provided, you can contact Merchant FX at:

Telephone: + 61(0)3 8393 1800
Email: info@merchantFX.com.au
Website: www.merchantFX.com.au
Level 11, 356 Collins Street
Melbourne 3000

Other documents you may receive

Product disclosure documents

A product disclosure statement (PDS) has been issued by Gleneagle Securities (Aust) Pty Ltd (Gleneagle) for Merchant FX Products. A PDS is a document (or group of documents) that makes disclosures about a financial product (other than securities). A PDS contains important information to assist you in making a decision about the product. You will receive a PDS if a recommendation is made to acquire a particular financial product or an offer is made to issue or arrange the issue of a financial product.

Transaction Documents

The provision of financial products and services by GAML will be undertaken in accordance with the terms and conditions detailed in the documentation that you will either receive from us or have downloaded from our website with respect to the relevant financial service provided to you.

What Financial Services are we authorised to provide?

GAML is authorised by its AFSL to provide a range of financial services. For the purposes of this FSG, the services provided by GAML are limited to:

- (a) providing general financial product advice only for the following classes of financial products:
 - (i) deposit and payment products limited to:
 - (A) basic deposit products;
 - (ii) derivatives;
 - (iii) foreign exchange contracts;
 - (b) dealing in a financial product by:
 - (i) issuing, acquiring, applying for, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (A) deposit and payment products limited to:
 - (1) basic deposit products;
 - (B) derivatives;
 - (C) foreign exchange contracts;
 - (ii) applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (A) deposit and payment products limited to:
 - (1) basic deposit products;
 - (B) derivatives;
 - (C) foreign exchange contracts;
 - (c) make a market for the following financial products:
 - (i) foreign exchange contracts; and
 - (ii) derivatives

with respect to investing in Merchant FX Products to retail and wholesale clients.

Neither GAML nor Merchant FX provides personal advice.

Merchant FX is acting for itself when it provides its financial services to you. This is referred to as the "Prime Account Service".

Our relationship with you

Both Merchant FX and GAML is responsible to you for any financial services which GAML provides to you which are within the authority given to Merchant FX.

GAML is responsible for the conduct of its appointed representative, Merchant FX.

Gleneagle acts as principal in all transactions with you in respect of OTC financial products. GAML may also arrange for you to be supplied with financial services and products issued by non-related product providers. GAML may receive a fee or commission payment from these non-related issuers or providers as a result of you investing in one of their products or services.

Prime Accounts

Prime Accounts are accounts which allow you, as the client, or your financial advisor, as your representative, to instruct Merchant FX to

deal in financial products on your behalf. These accounts are client directed and you determine the composition of your portfolio.

Who is the custodian of your Assets?

GAML does not provide custody services. A client's assets arising from Merchant FX Products are in your name.

How you can instruct us and your obligations

Merchant FX accepts order instructions in any of the following ways:

- electronically, via electronic trading platform;
- via telephone; and
- in writing (including email if authorised by you), you must check and confirm with us that orders sent via fax or email have in fact been received by us.

It is your obligation to review any confirmation or statement we send to you to ensure its accuracy and report any discrepancies to us immediately.

If you wish to discuss your Prime Account, obtain information about the type of portfolio in which you are invested, reporting or to update your personal information, you should contact Merchant FX.

Reporting

Whenever a transaction is executed on your account, a confirmation or statement will be sent to you by the issuer of an OTC derivative, or by Merchant FX on their behalf or available to be downloaded via the online trading platform. The confirmations may be delivered electronically to you, if authorised by you, according to Gleneagle and the other person's requirements.

Since GAML and Merchant FX only gives general advice and not personal advice, GAML will not keep records of client profiles for investment or advice purposes, advice or recommendations for the services covered by this FSG.

General Advice and Personal Advice

Any advice given by GAML is general advice only unless it is identified as personal advice to you. Our general advice provided to you as a retail client does not take into account your objectives, financial situation or needs.

Under the law regulating provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether generally or for a class or kind of investor, without taking into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions). Such general advice is provided without any expressed or implied recommendation that it is appropriate for you in light of your personal circumstances. The onus is on you, as the client, to assess whether the information or general advice provided is appropriate for your personal needs, objectives and circumstances.

You should be aware that general advice or information is not complete and it might lose currency or accuracy.

Regular updates, marketing materials, research reports, market reports, case scenarios, investment strategy reports, PDSs or other offer documents and website content are not personal advice.

Record Keeping

GAML seeks to ensure that comprehensive and accurate records of client profiles, together with all advice or recommendations provided are properly maintained.

How we are remunerated

There are no fees, charges or costs for the services covered by this FSG. The fees, costs and charges for transactions are disclosed in the PDS for those products.

Detail of Associations or Relationships

Merchant FX, who has a relationship with providers of broking, settlement and clearing services. These relationships do not materially influence the provision of financial services by Merchant FX to you. Some of these services are available directly to you if you elect to receive them.

Disclosure of Relevant Conflicts of Interest

Merchant FX has relationships with various parties whereby it pays fees or receives fees, charges or other remuneration (provided it is not banned conflicted remuneration). These parties may include (but are not limited to) product issuers, brokers, custodians, fund managers, banks, investment advisors, financial planners and other referral sources.

Merchant FX has documented processes for controlling, avoiding and disclosing relevant conflicts of interests.

If the range of fees, commission, charges or other benefits received by Merchant FX from a third party is not disclosed in this financial services guide, we will update any disclosure to you as soon as we can.

How the service provider (and any other relevant parties) are remunerated

There are no fees, charges or costs for the services covered by this FSG.

Gleneagle may receive fees, charges or costs in its role as issuing Merchant FX Products, which are disclosed in the PDS. Potential investors who receive services from Merchant FX should assume that Merchant FX has an indirect benefit from clients dealing in Merchant FX Products, though in a general sense this is not materially different from Gleneagle directly providing the same service to clients.

Gleneagle may receive fees, charges or costs in its role as issuing Merchant FX Products, which are disclosed in the PDS.

GAML and its associates have relationships with various parties whereby it pays fees or receives fees including on its personal account. These parties may include (but are not limited to) product issuers, brokers, custodians, fund managers, banks, investment advisors, financial planners and other referral sources.

GAML has a policy and documented processes for controlling, avoiding and disclosing relevant conflicts of interests for managing conflicts of interest that covers related party transactions and benefits or other remuneration from third parties.

Employees or authorised representatives of GAML may be remunerated through a combination of base salary and non-base salary compensation. The non-base salary may include a share of the commission, fees or other payments earned by the company (or an associate of it). The proportion of commission, fees or other payments shared with the employee or other representative is based on their level of experience, length of service with the respective company or its associate, the level of qualifications and market

conditions, and ranges from 0% up to 50%. Employees and other authorised representatives of those companies may also benefit from various internal incentive schemes including seminars, conferences and training programmes and non-cash rewards. Participation in these schemes is generally based on revenue production, minimum length of service and compliance with policies and industry regulations. In all cases, however, GAML does not pay remuneration to its employees or its representatives any remuneration which it is prohibited by law from paying to those persons.

We may record conversations between you and our employees or authorised representatives (with or without an audible tone). You may request a copy of the transcript of these recordings in anticipation of or in the event of a dispute. We may charge a reasonable administrative cost for providing this service.

Anti-Money Laundering

GAML has adopted a programme that complies with the AML/CTF Act. As part of this process, you will need to provide evidence of identification.

Dispute resolution

We want to know about any problems you may have with the service of GAML so we can take steps to resolve the issue. If you have a complaint about the financial product or service provided to you, please take the following steps:

1. Contact your GAML agent or advisor directly and provide the details of your complaint. You may do this by telephone, facsimile, email or letter.
2. If you make a complaint in writing (which is not compulsory), we will acknowledge receipt of your complaint within 5 business days.
3. If your complaint is not satisfactorily resolved through your GAML agent or adviser, within 5 business days of receipt of your complaint, please contact the Compliance Department on +612 8277 6600 or put your complaint in writing and send it to the Compliance Department at:

Level 27, 25 Bligh Street
Sydney, NSW 2000

4. GAML will try to resolve your complaint quickly and fairly. We will use our best endeavours to try to resolve your complaint within 45 days of receipt of your written complaint unless we advise you that we require more time due to the nature of your complaint or other reasonable consideration.
5. If you still do not get a satisfactory outcome, you have the right to complain to the Financial Complaints Authority (AFCA). AFCA is an external complaints and dispute resolution body. The service to you is free. The contact details for AFCA are:

Australian Financial Complaints Authority
G.P.O. Box 3,
Melbourne VIC 3001

Toll Free: 1800 931 678 (free call)
Facsimile: +613 9613 6399
Website: www.afca.org.au
Email: info@afca.org.au

GAML - membership number 14573;

4. The Australian Securities and Investments Commission (**ASIC**) also has an Info line on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

Recording of Telephone Conversations