

FINANCIAL SERVICES GUIDE

Admiralty Investment Management Pty Ltd

ACN 619 189 847 | AFSL: 503261

Barclay Pearce Capital Pty Ltd

ACN 634 843 735

Level 17

115 Pitt Street

Sydney NSW 2000

Tel: 02 8588 6900

1. ABOUT THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide (“**FSG**”) is designed to assist you in deciding whether to use any of the financial services offered by Barclay Pearce Capital Pty Ltd (ACN 634 843 735) and Admiralty Investment Management Pty Ltd (ACN 619 189 847) (“**we, our, us or Admiralty**”).

This FSG is designed to provide you with general information about Admiralty’s services and includes the following:

- Who we are and how you can contact us;
- The financial services we are authorised to provide to you;
- The cost of our services and how we are remunerated;
- The disclosure documents and statements you will receive;
- How we deal with your personal information; and
- Our internal and external dispute resolution processes.

This FSG was prepared on 4 May 2020 and replaces all previous versions.

Please contact us directly if you would like further information on this FSG or on any of our services.

2. HOW TO CONTACT US

You can contact and find out more about us in the following ways:

- By mail:** Level 17
115 Pitt Street
Sydney NSW 2000
- Telephone:** 02 8288 6900
- Email:** info@barclaypearce.com.au
- Website:** <http://barclaypearce.com.au>

3. ABOUT US AND THE FINANCIAL SERVICES WE OFFER

We hold Australian Financial Services Licence (“**AFSL**”) number 503261 issued by the Australian Securities and Investments Commission (“**ASIC**”) and are authorised to provide the following financial services to retail and wholesale clients:

- Provide financial product advice for:
 - basic deposit products and deposit products other than basic deposit products;
 - derivatives;
 - interests in managed investment schemes;
 - securities;
 - standard margin lending; and
 - superannuation;
- Deal in a financial product by issuing, applying for, acquiring, varying or disposing of:
 - securities; and
- Deal in a financial product by, on behalf of another person, applying for, acquiring, varying or disposing of:
 - basic deposit products and deposit products other than basic deposit products;
 - derivatives;
 - interests in managed investment schemes;
 - securities;
 - standard margin lending; and
 - superannuation.

Any financial services offered to you will be provided to you by a representative of Admiralty. We do not act as a representative of any other licensee in relation to the financial services we provide to you.

We are authorised to provide both general and personal advice. We only give personal financial product advice in limited situations. Unless otherwise expressly indicated, Admiralty will provide you with general financial advice only. You should note that general financial advice does not relate specifically to you and does not take into account your particular financial needs, objectives and financial circumstances. You should determine if any general advice is appropriate for you and should seek personal financial advice from a registered and licensed professional regarding the suitability of our products and services to your personal financial needs. Personal financial product advice is not provided through our website.

4. USING OUR SERVICES

If you wish to utilise our services, you may contact us by telephone or email, or via any other method as may be mutually agreed between us.

5. OTHER DOCUMENTS YOU MAY RECEIVE

If we recommend or refer you to a particular financial product, you may also receive a Product Disclosure Statement (**PDS**) prepared by the product issuer, which contains information about the particular product, including any relevant terms, significant risks and details of other fees and charges that may apply. This document will be provided to assist you in making an informed decision about that product.

We will also provide other documents as needed. These documents may include educational material, client agreement, or other offer documents.

6. OUR FEES AND CHARGES

When Admiralty provides financial services to you, certain fees may be charged for providing these financial services. These fees will be charged in accordance with Schedule 1 of this FSG.

Please note that the fees charged are dependent on the nature of the financial services provided to you.

If you invest in a product we provide advice on, Admiralty will receive remuneration in relation to your investment in that product. The remuneration we receive for the products we offer is set out in the offer document (e.g. PDS) for the particular financial product.

If you acquire or enter into a financial product we refer you, the provider will charge you costs as set out in their PDS or offer document. In addition, we will receive referrals fee from the product provider. You should refer to the client agreement and other documents you may receive from the broker for further information.

Our advisers and representatives will be remunerated based on a variety of performance criteria, including based on the volume of trading activity generated or the amount of volume based benefits generated for Admiralty.

We will endeavour to explain all fees payable by you prior to any advice or product being offered to you, and an invoice will be provided to you. You can request further particulars of remuneration, fees and commissions we receive by using the contact details provided above.

7. DISCLOSURE OF ANY RELEVANT CONFLICTS OF INTEREST

In addition to fees charged directly to you, Admiralty may receive commissions from the product providers we refer you to based on the volume and size of trading you conduct.

You can request further particulars of remuneration, fees and commissions we receive by using the contact details provided above.

8. MAKING A COMPLAINT

We have an internal dispute resolution process in place to resolve any complaints or concerns you may have. Any complaints or concerns should be made in writing and directed to our Complaints Officer on the details below.

Complaints Manager

Admiralty Investment Management Pty Ltd

Level 17, 115 Pitt Street

Sydney NSW 2000

Telephone: 02 8288 6900

Email: info@barclaypearce.com.au

If your complaint cannot be resolved to your satisfaction after this process, you have the right to lodge a complaint with the Australian Financial Complaints Authority (**AFCA**) on 1800 931 678. AFCA is an approved external dispute resolution scheme of which Admiralty is a member.

You may also contact the Australian Securities and Investments Commission (**ASIC**) info line on 1300 300 630.

9. COMPENSATION ARRANGEMENTS

We have professional indemnity insurance in place that complies with section 912B of the Corporations Act and ASIC Regulatory Guide 126. In particular, our professional indemnity insurance, subject to its terms and conditions, provides indemnity for Admiralty and our representatives and employees in respect of our authorisations and obligations under our AFSL.

10. OUR PRIVACY POLICY

Depending on the type of service being provided, we may ask you to provide certain personal information, either in writing or verbally. We may also ask you to present identification documents and we will retain copies of this information.

We are committed to protecting your privacy in compliance with the Privacy Act and National Privacy Principles. The information you provide to us will primarily be used for providing our services to you and for complying with certain laws and regulations. We have systems and processes in place which safeguard against the unauthorised use or disclosure of your personal information.

Please contact us if you have any concerns or if you would like to receive a copy of our privacy statement. Our privacy statement is also on our website.

SCHEDULE 1

Transaction Fees	
Type of Product	Maximum fee
Securities and Warrants	Per transaction up to \$220 or 2.2% (including GST) of the transaction value (whichever is greater).
Exchange Traded Options	Per transaction fee of \$220 (including GST) of up to 40 options contracts and \$2.20 (including GST) per contract thereafter.
Contracts for Difference (CFDs)	Notional value of the transaction up to 1.1% (including GST). Please note that this will be charged to you by the CFD provider, not Admiralty, and rebated to us.

*Note: If you request to trade via Direct Market Access (**DMA**), you may be charged royalties from IRESS. Please contact Admiralty for confirmation of costs and the IRESS Terms and Conditions.*

Miscellaneous Fees and Charges		
Service	Description	Fees and charges (including GST)
Manual Booking	Rebooking a transaction	\$50.00
RTGS Payment	Same day payment	\$20.00
SRN Request	To make a request to the registry for holding details	\$55.00
Postage of Contract Note	Postage fee	\$2.00 per note
Initial Fail Fee Charge	For failure to have adequate funds in linked account to cover transaction	10bps with a minimum of \$110 per day
Dishonour Fee	Dishonour notice from banking institution	\$82.50
ASX Levied Fail Fees	Standard ASX transaction fees	On charged