

## FINANCIAL SERVICES GUIDE

### Introduction

This Financial Services Guide ("FSG") is intended to inform you of certain basic matters relating to our relationship, prior to Bennett & Co Financial Services Pty Limited ("Bennett & Co") providing you with a financial service.

This FSG is an important document which is designed to assist you in deciding whether to use any of the financial services we offer. It will provide you with information about the services and products we are authorised in, how we are remunerated and details of our internal and external dispute resolution procedures, including any compensation arrangements in place.

Where Bennett & Co provides advice and financial services to you regarding direct share investment, it utilises CMC Markets ("the Authorised Provider") for execution, settlement and CHESS sponsorship services. We provide all services to you and you must communicate your account and market-related instructions direct to us, and we will then on-forward those instructions to the Authorised Provider. The Authorised Provider will provide you with its own FSG covering the services it provides to you.

#### Not Independent

We are not considered independent, impartial or unbiased within the meaning of s923A of the Corporations Act because we may receive a fee from product issuers for certain placements that we recommend e.g. an "Initial Public Offering" (IPO).

### Other documents you may receive from us

You are entitled to receive a Statement of Advice ("SOA") whenever we provide you with personal advice, which takes into account your objectives, financial situation and needs. The SOA will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

Where subsequent advice is provided that does not involve a significant change, advice may be provided to you verbally and retained by us as a Record of Advice ("ROA"). You may request a copy of any ROA provided to you at any time, are no limitations in relation to time or how you make your requests for a copy of the ROA.

In the event we make a recommendation to acquire a particular financial product, we may also have to provide you with a Product Disclosure Statement ("PDS"). PDS is a document that provides you with information about a financial product and the entity that issues the financial product (the Issuer).

### Provider of the financial services

Bennett & Co Financial Services Pty Limited (ABN 69 118 309 032) and its representatives are the providers of the financial services detailed in this FSG. Bennett & Co is authorised by the Australian Financial Services Licence (No 298 282) issued under the Corporations Act 2001 (Cth) and is responsible for the financial services that will be provided to you, or through you to your family members, including the distribution of this FSG.

Your advisers are Authorised Representatives of Bennett & Co, for an introduction to our advisers please see our website at [www.bennettfinancial.com.au](http://www.bennettfinancial.com.au). Bennett & Co advisers always act for you, our client, when providing our advice and dealing services.

Bennett & Co is authorised to provide advice and dealing services to retail and wholesale clients in the following:

- Basic and non-basic deposit and payment products;
- Derivatives;
- Foreign exchange contracts;
- Interests in managed investment schemes including investor directed portfolio services;
- Securities;
- Standard margin lending facilities; and
- Superannuation.

## Fees payable for each service provided

Regarding share transactions, Bennett & Co has an agreement with the Authorised Provider under which Bennett & Co determines the rate in consultation and agreement with you, the client, at which the Authorised Provider will charge you brokerage on any trades (which the Authorised Provider will deduct, from the settlement proceeds from the bank account nominated by you or the bank account which the Authorised Provider opens as trustee for you).

In addition to the brokerage the Authorised Provider charges you, you may incur other amounts set out in Appendix A of the Authorised Providers' FSG. You will be provided with the Authorised Providers FSG prior to opening an account with us.

## How we are paid for services provided

We believe the services we offer are valuable and the remuneration received is a fair reward for our expertise and skills. We are committed to being open about any benefits or payments we receive and the costs you will incur for using our services.

The income earned by Bennett & Co may come from:

- brokerage per share transaction;
- placement fees from product issuers;
- a fixed fee for services provided; and/or
- fees based on the value of your assets.

For share transactions, Bennett & Co receives the brokerage you are charged after retention of a portion by the Authorised Provider as set out above. Brokerage fees are confirmed with you in writing at the time when your account is opened. The fee is charged at a rate of up to 2.2% (incl. GST) of the market value of the transaction, subject to a minimum fee of up to \$110 (incl. GST).

Alternatively, you may choose to enter into a fee based arrangement whereby Bennett & Co will invoice you either a fixed flat fee or a per annum fee up to 2.2% (includes GST), based on the value of your assets that Bennett & Co manage on your behalf. This fee will be negotiated by you and Bennett & Co, and will be agreed in writing at the time when your account is opened.

For fee based arrangements, the fees may be calculated and paid on a monthly or quarterly basis (based on the total portfolio value) and paid via deductions that you authorise from your nominated account, or they may be calculated on a per annum basis and charged quarterly (1<sup>st</sup> January, 1<sup>st</sup> April, 1<sup>st</sup> July, 1<sup>st</sup> October) in arrears e.g. between the market closing on the final day of the quarter and the market opening on the first day of the next quarter, a snapshot of the clients portfolio and cash is taken and a fee is charged based on a rate pre-agreed between the client and Bennett & Co.

In addition to the above, Bennett & Co may receive placement fees for services provided (known as stamping fees) for new floats and share placements of up to 1.25% per transaction, paid by the issuer based on the volume of placements.

All remuneration is payable to, received and retained by, Bennett & Co as the Licensee. Representatives may be remunerated by way of a market-based salary with performance bonuses, which is based on a range of factors and not dependant on volume of revenue or transactions. Certain representatives may also be entitled to a share of profit by way of directors distributions.

Full details of the fees you will pay to Bennett & Co will be provided in your Statement of Advice, including all representative remuneration.

## How to use our services

You can provide instructions to us in person, by phone, fax or email, subject to written confirmation in some instances. We will advise you of our requirements when we provide you with advice.

If you wish to execute share transactions using the execution, settlement and sponsorship services that the Authorised Provider provides to us, you must provide your instructions to us and the method by which the Authorised Provider will accept the instructions will be subject to the terms and conditions of trading between Bennett & Co, the Authorised Provider and you (available from Bennett & Co), and your authorisation for Bennett & Co to open an account with the Authorised Provider.

To use the Authorised Provider's sponsorship services, you will need to enter into a CHESS Sponsorship Agreement with the Authorised Provider (which forms part of your account opening documentation with Bennett & Co). Any transactions undertaken will be confirmed in writing to you by the Authorised Provider.

If you require further advice, please contact us directly.

## Complaints

It is important to us that you are satisfied with our services. If you have a complaint about Bennett & Co or are dissatisfied with the services that Bennett & Co provided, you should follow the steps below.

**Step 1:** Contact the Complaints Officer at Bennett & Co and advise details of your complaint.

Complaints Officer  
Bennett & Co Financial Services Pty Limited  
PO Box 737, Toowong QLD 4066  
Phone: (07) 3876 9919  
Email: [compliance@bennettfinancial.com.au](mailto:compliance@bennettfinancial.com.au)

We will do our best to resolve the matter quickly and fairly.

We have a Complaints Guide available upon request or from our website which provides further information about what to expect from our complaints handling process and any further assistance that can be provided.

**Step 2:** If your complaint cannot be resolved to your satisfaction by us within thirty (30) days, you may refer the matter to the Australian Financial Complaints Authority ("AFCA"), of which Bennett & Co is a member. AFCA are an ASIC-approved external dispute resolution facility responsible for providing fair and independent complaints resolution services, which are free to consumers. You can contact AFCA as below:

Australian Financial Complaints Authority  
GPO Box 3, Melbourne Vic 3001  
Ph: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au) or web: [www.afca.org.au](http://www.afca.org.au)

The Australian Securities and Investments Commission ("ASIC") regulates all financial services providers, including Bennett & Co, they can be contacted on 1300 300 630.

## Professional Indemnity Insurance

Bennett & Co holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act 2001 (Cth), which covers us for any errors or mistakes relating to our services, including services provided by Authorised Representatives. Cover also includes Authorised Representatives who are no longer engaged by us but were at the time the services were provided.

## Your Privacy

We will keep records of our relationship and dealings with you. This will include your personal details, your financial situation, objectives and needs, as well as any recommendations made to you. If you wish to examine your file at any time please ask us. Your information is kept secure. You may request a copy of our Privacy Policy at any time.

As a financial service provider, we also have an obligation under the Anti Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports, driver's licence and regulatory registrations for other entities. We will also retain copies of this information. We assure you that this information will be held securely, in accordance with our Privacy Policy.

## Contact Details

If you have any further questions about the financial services we provide, please contact us on the below details. Please also retain this document for your reference and any future dealings with us.

Attn: Managing Director  
Bennett & Co Financial Services  
PO Box 737  
Toowong QLD 4066

This FSG is dated 2<sup>nd</sup> May 2023 and remains valid unless a further FSG is issued to replace it.