

Financial Services Guide

Synergy Financial Markets Pty Ltd

A.B.N. 80 150 565 781

Australian Financial Services Licence (“AFSL”) Number: 403863

FINANCIAL SERVICES GUIDE

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1. A Guide to Our Relationship With You

Synergy Financial Markets Pty Ltd (“Synergy, we, our, us”) is an investment management and execution services business, which offers you the ability to trade international financial markets via over the counter (“OTC”) derivative products. Synergy also provides both general and personal advice (IMA service only) and deals in financial products on your behalf.

2. About this Financial Services Guide

The purpose of this Financial Services Guide (“FSG”) is to detail the financial services offered by Synergy and to assist you in making an informed decision whether to use our services, before seeking our advice. This FSG has been prepared in accordance with, and complies with, the requirements of ASIC Regulatory Guide 179 and the relevant ASIC class order relief.

This FSG explains:

- Other disclosure documents and statements we may give you;
- Who we are and how you can contact us;
- Financial services and products we are authorised to provide;
- How you can instruct and communicate with us;
- How we get paid (remuneration, commissions, benefits);
- How we deal with customer complaints and where you can go for further help;
- Our compensation arrangements;
- Potential conflicts of interest; and
- Records we keep and how we deal with your personal information.

This FSG contains general information. If you have further questions after reading it please contact us.

3. Other Disclosure Documents We May Give You

Synergy will provide clients with the relevant documentation to facilitate transactions as requested. These may include, but are not limited to, Account Application forms, Product Disclosure Statements, Terms and Conditions, Statements and trade confirmations.

Execution Services:

Synergy can provide you with factual information and research, and facilitate execution requests.

Product Disclosure Statements: Where we provide you with general advice in relation to a product (other than securities listed on the ASX or a managed discretionary account service) to a retail client, we will provide a Product Disclosure Statement (“PDS”), which will assist you in deciding whether to acquire the financial product. The PDS contains important information about the product features, benefits, risks and fees associated with that product. The PDS should be read carefully to enable you to make an informed decision about whether this product is appropriate for you.

Terms and Conditions: This document is the contract between you and Synergy in regards to the execution services. It is legally binding and you will need to read and agree to it before opening an account with Synergy.

Managed Discretionary Account Service:

Where we provide you with an Individually Managed Account (“IMA”) service we are not obliged to give you a PDS, however, we will only act in

accordance with the specific Investment Program approved by you in your IMA Contract.

You should ensure that you receive a copy of the IMA Contract including the relevant Investment Program before engaging us to provide you with an IMA service. This contract must be executed before the IMA service can be provided. Further details are provided elsewhere in this FSG.

Statement of Advice: You are entitled to receive a Statement of Advice (“SOA”) when we give you personal advice as a retail client. Personal advice is advice that takes into account your personal objectives, financial situation and needs. The SOA will set out the advice and will include information regarding the basis on which the advice was given, any fees or commissions received in providing the advice and a warning where the advice has been provided based on incomplete information. If we provide you with additional advice we may give you a Statement of Additional Advice (“SOAA”). The SOA and SOAA present the advice and basis on which it was given.

Where you maintain the advice relationship with us, a SOA may not be provided for further advice situations provided that your circumstances and the basis of the advice are not significantly different. However, we are required to keep a record of the advice. You may request a copy of the Record of Advice (“ROA”) we keep up to seven (7) years after the advice was given.

4. Our Contact Details

Address: Level 27, 25 Bligh Street,

Sydney, NSW. 2000. Australia

Phone: +61 2 8274 2600

Email: info@SynergyFinancialMarkets.com.au

Web: www.synergyfinancialmarkets.com.au

5. Financial Services and Products We Are Authorised to Provide

Synergy is authorised under its AFSL to provide you with the following range of financial services:

1. provide financial product advice on the following classes of financial products:
 - derivatives;
 - foreign exchange contracts;
 - interests in managed investment schemes (excluding investor directed portfolio services);
 - interests in managed investment schemes limited to managed discretionary account services; and
 - securities;

2. deal in a financial product by: issuing, acquiring, applying for, varying or disposing of in respect of the following classes of financial products:
 - derivatives;
 - foreign exchange contracts; and
 - interests in managed investment schemes limited to managed discretionary account services;
3. deal in a financial product by: applying for, acquiring, varying or disposing of those products on behalf of another person in respect of the following classes of financial products:
 - deposit and payment products (limited to basic deposit products);
 - derivatives;
 - foreign exchange contracts;
 - interests in managed investment schemes (excluding investor directed portfolio services);
 - interests in managed investment schemes limited to managed discretionary account services; and
 - securities; and
4. make a market in:
 - foreign exchange contracts; and
 - derivatives.

Our AFSL authorises us to provide the above services to retail and wholesale clients.

6. Nature of Advice and our Responsibilities

Synergy provides both personal advice (IMA service only) and general advice in relation to securities and derivatives.

Personal Advice (IMA Service only): Personal advice is advice that takes into account one or more of your objectives, financial situation and needs (“Personal Circumstances”). You should immediately notify your client adviser if your Personal Circumstances change. Each time you receive any personal advice, you will be asked to confirm whether your Personal Circumstances have changed. Your client adviser can only make recommendations based on the information provided by you. Without all the necessary information, the advice given may not be appropriate for your Personal Circumstances.

Please note that although authorised to do so, Synergy does not usually provide personal advice in relation to other financial products, such as derivatives and foreign exchange contracts.

General Advice: We will provide you with general advice in relation to derivatives and foreign exchange contracts.

Any general advice we provide to you, as a retail client does not take account of your Personal Circumstances. Before acting on any general advice, you must consider the appropriateness of the advice in light of your Personal Circumstances. Newsletters, trade alerts and research papers are examples of general advice we may give you.

Before taking any action to acquire any of the financial products or services mentioned in this FSG you should consider whether the product or service is appropriate having regard to your Personal Circumstances. You should also consult the relevant PDS and ensure that you understand the risks associated with the financial products and services you enter into with Synergy.

7. Products We Provide

Execution Service:

Synergy provides an execution service and provides you with general advice in relation to over-the-counter (“OTC”) derivatives. Synergy acts as a market maker when dealing in OTC derivatives. Accordingly, Synergy may act as principal in transactions with you in respect of OTC derivatives.

Synergy also provides IMA services. Further details of this service are set out below.

Synergy may occasionally arrange for you to be supplied with financial services and products issued by non-related product providers. Synergy may receive a fee or commission payment from these non-related product providers as a result of you investing in one of their products or services. Any remuneration that Synergy may derive is included in the fees and commissions you pay as outlined under the heading “How do we get paid”.

Individually Managed Account Service:

Synergy’s IMA service is an investment portfolio that is individually managed for a client by a professional manager who executes transactions in their account in derivatives, based on the client’s stated investment strategy and/or objectives.

To open an Individually Managed Account with Synergy, it is necessary for us to review your Personal Circumstances to determine if our IMA service is suitable for you. We therefore require you to complete the online Account Application form in full. If you do not provide us with the information requested, we may not be able to process your application.

Upon completion of that analysis, Synergy will provide you with a Statement Of Advice (SOA), which will detail the investment strategy and its suitability. Accepted applicants will be required to complete an IMA Contract with Synergy.

IMA Contract: The IMA Contract provides all relevant communication protocols, and includes an Investment Program prepared in accordance with the requirements of the Corporations Act, detailing the following:

- the nature and scope of our discretion;
- any significant risks associated with the IMA service;
- the basis on which we consider the IMA service suitable for retail clients; and
- warnings about the importance of any applicable limitations relating to the IMA contract which you should consider prior to signing the IMA contract.

Risks: There are significant risks associated with entering into an IMA Contract. The process of reducing and defining the risks taken is known as risk management.

The Investment Manager, as a guideline, will try to limit exposure to any individual currency pair such that on each transaction margin and mark to market exposure should not exceed 15% of the Account’s available equity. The Investment Strategy does not deal in risk-free positions. Risk is assessed continually. In actual fact, more time and attention goes into controlling risk and optimising return on established positions than any other aspect of the trading conducted by the IMA Operator on behalf of the Client. On a daily basis, the risks and benefits to each position from small and large price changes, volatility swings, and the passage of time are quantified, analysed and adjusted if necessary.

All investments have an inherent level of risk. You should read the section headed “Significant Risks” in the PDS or in our IMA Contract. IMAs are only suitable for clients who understand financial markets and the risks associated with trading in these markets.

Reports: Synergy will provide our IMA clients with a report at least daily. This report will detail your investment portfolio, including comprehensive information as to transactions and performance for the period. You will also receive an Annual Report summarising the information provided.

If you wish to instruct Synergy in relation to the financial assets held in your IMA portfolio, you must do so by the methods set out below.

8. How to Instruct Us

Before transacting with Synergy you must open an account with us. You may then give instructions to us in any of the following ways:

- by the telephone (please note your telephone calls to us will be recorded); and

- in writing (including by email or facsimile by prior arrangement, note you must confirm with us that such instructions have in fact been received by us).

9. How Do We Get Paid?

Transaction based fees for Execution Services:

Synergy is remunerated through the fees and commissions that we charge you for executing transactions electronically via one of the Synergy trading platforms, or Synergy executing on your behalf. Fees and commissions charged to you will depend on the type of financial product being traded, the frequency of your trading activity, the type and level of service required and the size of your transaction. Fees and commissions are subject to negotiation prior to transacting any business. Fees and commissions, once disclosed and agreed, will be charged to your Account at the time any transaction is executed.

The brokerage rates below are the standard that Synergy may charge and are provided as a guide only. Synergy will provide you with details of the rates applicable to you at the time you enter into the Client Agreement.

Fees for the Synergy Individually Managed Account Service:

Synergy charges the following types of fees in respect of its IMA services.

- Brokerage fee – paid to Synergy for each transaction undertaken within the IMA;
- Management fee – a proportion of assets; and
- Performance fee – a proportion of the returns your portfolio makes

A detailed description of the fees, charges and commissions payable in respect of the financial product traded under the IMA service are set out in the relevant documentation (i.e. the Investment Profile) for that particular IMA strategy. Synergy will provide you with details of the rates applicable to you at the time you enter into the IMA Contract.

10. Commissions, Remuneration and Other Benefits Received by Synergy and our Employees

Synergy is entitled to retain any interest it earns on client money held in the segregated accounts it must maintain pursuant to the Corporations Act and the Australian Client Money Rules. The rate of interest is determined by the provider of each segregated account.

Our employees and directors are remunerated by way of salary and other employee benefits. They may also be eligible for a discretionary bonus

related to business objectives. Certain employees, directors and representatives may also receive up to 100% of all fees and commissions generated from their clients depending on the level of salary and the aggregate revenue that they earn for Synergy. Such payments are generally made in the form of monetary benefits and are paid quarterly or annually.

11. Commissions, Remuneration and Other Benefits Paid by Synergy

You may have been referred to us by a service provider who may receive financial or non-financial benefits from us. These should be disclosed to you by the service provider in question. Please note that such benefits will not impact transaction fees or the rates you will be offered for financial products or services undertaken with Synergy.

12. Soft Dollar Benefits

Synergy may from time to time receive a benefit from preferred product providers including educational seminars, conferences, and training days. Details of benefits valued at AUD\$200 or above received by us will be maintained on a register.

13. Changes to Fees or Expenses

Synergy may give you prior notice of changes to the fees or expenses. Please refer to the following documents which outline the action Synergy may take:

- IMA Contract (for IMA service); and
- Terms and Conditions (for Execution Services).

14. Compensation Arrangements

Synergy holds Professional Indemnity Insurance that complies with s912B of the Corporations Act and ASIC Regulatory Guide 126. This insurance covers the activities conducted under our AFSL. The policy provides coverage in the aggregate of up to AUD\$5,000,000 to cover claims regarding professional negligence, directors and officers liability, crime (fraud) and the conduct of representatives (including representatives who no longer work for us but who did at the time of the relevant conduct). Our Professional Indemnity Insurance cover is subject to the policy terms and conditions.

15. Conflicts of Interest

Conflicts of interest may occur from time to time. Synergy will advise you of any material interest that could reasonably be expected to influence our provision of services to you.

However, you should be aware that:

- Synergy' client advisors are remunerated wholly or in part on a share of brokerage or commission basis;
- If you have been referred to us by a third party, that person may receive a share of brokerage charged to you.

16. Dispute Resolution

We want to know about any problems or concerns you may have with our services so we can take steps to resolve the issue. We have internal and external dispute resolution procedures to resolve complaints from clients. A copy of these procedures may be obtained by contacting us. Initially, all complaints will be handled and investigated internally. Should you feel dissatisfied with the outcome, you have the ability to escalate your concerns to an external body for a resolution.

Synergy is a member of the Financial Ombudsman Service ("FOS") (number 26427), which is an approved external dispute resolution scheme that can deal with complaints about all of the financial services Synergy Pty Ltd provides under its AFSL.

If you have a complaint about the financial services provided to you, please take the following steps:

Contact Synergy Pty Ltd to inform us about your complaint. You may do this by telephone, facsimile, email or letter. If you are dissatisfied with the outcome, you have the right to complain to the Financial Ombudsman Service (FOS) in writing at:

Financial Ombudsman Service:

Address: G.P.O. Box 3
Melbourne VIC 3001

Telephone: 1300 780 808

Facsimile: (03) 9613 6399

Web: www.fos.org.au

Email: info@fos.org.au

You can contact the Australian Securities and Investments Commission on 1300 300 630. This is a free call info line. This is another alternative that you may use to make a complaint and obtain information about your rights.

17. Our Record Keeping Obligations

We will maintain comprehensive and accurate records of your client transactions and advice provided.

18. Our Privacy Policy

We are committed to protecting your privacy. The information you provide to us and any other information provided by you in connection with the services provided by Synergy under this FSG will be used for the primarily for processing your application and providing you with advice and complying with certain laws and regulations. Synergy will not share this information with a third party, unless you provide us with written permission to do so, or unless required to do so in accordance with the law.

A copy of our Privacy Policy is available on our website.

Please contact us if you have any other concerns or if you would like further information.