



GILSHENAN CAPITAL

Gilshenan Capital Pty Ltd
Australian Financial Services Licence No. 485954
ACN 611 216 374

FINANCIAL SERVICES GUIDE (FSG)

PART 1

PURPOSE AND CONTENT OF THIS FSG

The financial services referred to in this financial services guide (**FSG**), prepared and dated 29th September 2017, are provided by Gilshenan Capital Pty Ltd (ACN 611 216 374; AFSL No. 485954) (**Gilshenan Capital**, “we” or “us”).

This FSG has been designed to provide you with important information regarding our financial services to assist you in deciding whether to use any of these financial services.

This FSG contains the following important information:

- Information about Gilshenan Capital and our contact details
- General information about the financial services and products we provide
- Any potential conflict of interest we may have
- How we deal with complaints about our services and products
- How we deal with your personal information
- Our fees and charges

INFORMATION ABOUT GILSHENAN CAPITAL

Gilshenan Capital holds Australian Financial Services Licence (**AFSL**) No. 485954.

Gilshenan Capital is a boutique financial services business providing advisory services to retail and wholesale clients in Australia in relation to various financial products such as securities, foreign exchange contracts, interests in managed investment schemes (excluding investor directed portfolio services) and deposit and payment products.

Contact details:	Gilshenan Capital Pty Ltd
Address:	Level 13, 50 Cavill Avenue Gold Coast QLD 4217
Postal address:	Level 13, 50 Cavill Avenue Gold Coast QLD 4217
Telephone:	1300445743
Email:	admin@gilshenancapital.com
Website:	www.gilshenancapital.com

FINANCIAL SERVICES WE ARE AUTHORISED TO PROVIDE

In the provision of the financial services to you, Gilshenan Capital acts as principal in our transactions with you. Gilshenan Capital is responsible for the financial services it provides to you through our employees.

Under its AFSL, Gilshenan Capital is authorised to provide the following financial services:

- (a) provide general financial product advice for the following classes of financial products to retail and wholesale clients:
 - (i) deposit and payment products limited to:
 - (A) basic and non basic products;
 - (ii) derivatives;
 - (iii) foreign exchange contracts;
 - (iv) interests in managed investment schemes excluding investor directed portfolio services; and
 - (i) securities;

- (b) deal in a financial product by:
 - (i) issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products to retail and wholesale clients:
 - (A) derivatives;
 - (B) foreign exchange contracts;

 - (ii) issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products to wholesale clients:
 - (A) interests in managed investment schemes limited to:
 - (1) own managed investment scheme only; and
 - (B) securities; and

 - (iii) issuing, applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of financial products to retail and wholesale clients:
 - (A) deposit and payment products limited to:
 - (1) basic deposit products;
 - (B) derivatives;
 - (C) foreign exchange contracts;
 - (D) interests in managed investment schemes excluding investor directed portfolio services; and
 - (E) securities; and

- (c) provide the following custodial or depository services to retail and wholesale clients:
 - (i) operate custodial or depository services other than investor directed portfolio services.

The nature of Gilshenan Capital's business will include providing recommendations to clients to buy or sell financial products through model portfolios and act as an introducing broker. In addition, Gilshenan Capital may (from time to time) offer a subscription based service where it will prepare and circulate regular market commentary reports and recommend investment opportunities.

Gilshenan Capital will also act as the trustee and investment manager to wholesale managed investment schemes.

Gilshenan Capital only provides **general** (not personal) financial product advice which means that we do not take into consideration your personal financial needs, objectives and financial circumstances. Therefore, recommendations may not be appropriate to your particular financial needs, objectives and financial circumstances. You need to take this into account before deciding whether or not to act on our general advice.

TRANSACTING

You can provide instructions to us by telephone, mail, or email. Any instructions relating to change of details, withdrawals or transfers must be made in writing. Email will be accepted provided that email authorisation has been granted on your account. For any instructions provided over the telephone, Gilshenan Capital will acknowledge the instructions via email and confirmation will be required by you via return email.

ASSOCIATIONS OR RELATIONSHIPS WITH OTHER ENTITIES

Gilshenan Capital has entered into an Introducing Broker Agreement with Saxo Capital Markets (Australia) Pty. Ltd. Gilshenan Capital may enter into other similar or additional introducing broker type arrangements.

DISCLOSURE OF CONFLICTS OF INTEREST

Gilshenan Capital acts as principal when providing the financial services to you. When Gilshenan Capital acts as your agent or broker, it acts in your interests. Gilshenan Capital has a policy for managing, avoiding and disclosing relevant conflicts of interests, available on request.

Gilshenan Capital directors and employees may hold or invest in any of the financial products that we recommend to our clients.

Gilshenan Capital may pay a fee or other benefit to other persons for introducing or for acting on behalf of clients, either by way of one-off fee, as a percentage of income generated by those clients referred to Gilshenan Capital, or a combination of both. Those other persons must disclose to you the fees or other benefits they receive.

EMPLOYEES AND REPRESENTATIVES

Representatives and other staff may also receive bonuses at the discretion of senior management, having regard to standards of service provided to clients and feedback from them, and reaching a range of personal performance targets.

PROFESSIONAL INDEMNITY INSURANCE

Gilshenan Capital has the benefit of professional indemnity insurance that complies with section 912B of the Corporations Act 2001 (Commonwealth) (**Policy**). Subject to its terms, the Policy covers certain clients for loss or damage suffered as a result of breaches of the relevant obligations of Gilshenan Capital and its employees in relation to its AFSL.

Also, subject to its terms, the Policy covers certain breaches by Gilshenan Capital's employees and representatives employed by Gilshenan Capital at the relevant time.

DISPUTES AND COMPLAINTS HANDLING

Gilshenan Capital is committed to providing our clients with outstanding products and services. If you have a complaint about the financial services provided to you, please raise the issue by following the steps below:

1. Contact a Gilshenan Capital Account Manager and provide the details of your complaint. You may do this by telephone, facsimile, email or letter.
2. If your complaint is not satisfactorily resolved within two (2) business days of our receipt of your complaint, please put your complaint in writing and send it to the Complaint Officer at:

Level 13, 50 Cavill Avenue
Gold Coast QLD 4217
Or by email at admin@gilshenancapital.com

Gilshenan Capital will make every effort to resolve your complaint quickly and fairly. Complaints received in writing will be acknowledged within two (2) business days of receiving your written complaint and we will use our best endeavours to try to resolve your complaint within 45 days of receipt of your initial complaint.

3. If you are not satisfied with the final response provided by our Complaint Officer, you have the right to complain to the Australian Financial Complaints Authority Limited (AFCA), if your complaint is within its terms of reference. You may lodge a written complaint to AFCA, an independent complaints resolution body which is available to you free of charge. Please note that AFCA will not initiate any investigations unless we have had the opportunity to respond to your complaint.

The contact details for AFCA are:

Australian Financial Complaints Authority Limited
G.P.O. Box 3
Melbourne VIC 3001
Telephone: 1800 931 678
Website: www.afca.org.au

Gilshenan Capital is a member of the AFCA complaints resolution scheme (No. 39073). The service provided to you by AFCA is free of charge.

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

PRIVACY

Your privacy is important to us and we are committed to compliance with the Privacy Act 1988 (Commonwealth). We maintain a record of your personal profile which includes your personal details and details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We may disclose your personal information to external parties, such as our financial service providers, for the purposes of arranging or facilitating your investments or transactions. These external parties are committed to protecting your privacy. We may also collect, hold and use your personal information to undertake appropriate administration, including in relation to the "Know Your Client" obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Commonwealth) and its related regulations.

You can obtain a copy of our Privacy Policy by contacting us or visiting our website at www.gilshenancapital.com.

PART 2

FEES, CHARGES AND REMUNERATION

Unless otherwise stated, all fees, charges, commissions and benefits disclosed in this FSG are inclusive of goods and services tax (**GST**).

Our fee structure is outlined in the table below:

Fee	Amount (or percentage)
<p><u>Model Portfolio:</u></p> <p>Establishment Fee This is a one-off upfront payment to Gilshenan Capital when you become a client for this service.</p> <p>Management Fee This is the fee payable to Gilshenan Capital for clients wishing to subscribe to Gilshenan Capital's model portfolio service.</p> <p>Performance Fee This is the fee payable to Gilshenan Capital for assisting clients to achieve profits in their portfolio.</p> <p><u>Stalking Stocks:</u></p> <p>Establishment Fee This is a one-off upfront payment to Gilshenan Capital when you become a client for this service.</p> <p>Management Fee This is the fee payable annually to continue receiving the service.</p>	<p>\$2,200, once off, non-refundable.</p> <p>1.1% of the client's portfolio balance (with a minimum management fee of up to \$1,100) per annum.</p> <p>10% of the increased amount of the client's portfolio balance from the previous quarter, attributable to profits made for the client (plus 10% GST), adjusted pro rata, and charged quarterly.</p> <p>\$5,500, once off, non-refundable.</p> <p>\$990 per annum.</p>
<p>Transaction fees</p> <p>This is the fee payable to Gilshenan Capital for the facilitation and execution of orders on a client's behalf. This fee is included in the amounts you pay to the execution broker or issuer, who remits your payments to us.</p>	<p>(a) up to 0.05% of the value of the transactions (minimum amount paid to Gilshenan Capital will be \$15.10); and</p> <p>(b) USD0.01 cent per share for US Equities.</p> <p>This may vary with transactions in foreign currencies. Each client will sign a Payment Schedule confirming exactly the inclusive charges paid to the execution broker or issuer.</p>