FINANCIAL SERVICES GUIDE

Version: 16 December 2019 Financial Services Guide

PURPOSE AND CONTENT OF THIS FSG

This Financial Services Guide (FSG) is prepared by Saxo Capital Markets (Australia) Pty Ltd (ABN 32 110 128 286, AFSL 280372) (SCM, we, us or our) and is designed to tell you about the financial services and products that we are authorised to offer under our Australian financial services licence (AFSL).

This FSG contains important information about:

- who we are and how you can contact us;
- the financial products and/or services we are authorised to offer you;
- how we and our associates are remunerated:
- our internal and external dispute resolution procedures and how you can access them; and
- the privacy of your personal information.

This FSG should assist you in deciding whether to use any of the products or services we offer.

PRODUCT DISCLOSURE STATEMENTS AND OTHER DOCUMENTS

The Product Disclosure Statement (PDS) is a document which contains important information about the financial products offered on our trading platforms, including the risks and costs associated with the financial product. Before making any decision to acquire any of financial products using our trading platforms, you should carefully review the PDS.

You should also read our General Business Terms before trading with us. The General Business Terms, along with the PDS, govern the terms of our relationship with you.

WHO IS SCM

SCM is licensed by the Australian Securities and Investments Commission (ASIC) and is part of the Saxo Group. Saxo Bank is a fully licensed European bank under the supervision of Danish FSA, who is specialising in online trading and investment across the international financial markets.

SCM'S PRIVACY POLICY

We value the privacy of your personal information. When we collect, use, disclose or handle personal information, we are bound by the Privacy Act 1988 Cth.

Our full privacy policy (**Privacy Policy**) is available from our website www.home.saxo/en-au (**SCM Website** or **Website**)

If you would like a copy of the Privacy Policy, or wish to seek access to, or correct the personal information we collect or disclose about you, please contact us.

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THE FINANCIAL PRODUCTS AND SERVICES WE ARE AUTHORISED TO PROVIDE TO YOU

SCM holds an AFSL which authorises us to provide the following services to both wholesale and retail investors:

- provide general financial product advice and deal in basic deposit products, derivatives, foreign exchange contracts, interests in managed investment schemes (excluding investor directed portfolio services), government debentures, stocks or Bonds and securities:
- make a market for derivatives and foreign exchange contracts; and
- operate custodial or depository services other than investor directed portfolio services.

SCM will only provide general advice. SCM does not provide any personal advice which takes into account your personal objectives, financial situation or needs. If you require personal advice, please contact your financial adviser, who will provide you with a statement of advice in respect of any personal financial product advice given to you.

Before acting on any advice asked of or given by an employee of SCM, you should carefully consider the appropriateness of the advice (or consult your financial adviser), having regard to your personal objectives, financial situation and needs.

SCM PRODUCTS & SCM SERVICES AVAILABLE VIA THE DIFFERENT SAXO TRADING PLATFORMS

Please refer to the PDS for more details about the SCM Products and SCM Services.

SCM Products

Over The Counter (OTC) Products, such as:

- Contracts For Difference (CFDs)
- Commodities
- FX & FX Options
- Metals & Metals Options

SCM Services*

Exchange Traded Products**, such as:

- Equities & Equity Options
- ETFs & ETF Options
- ETCs & ETC Options
- Futures & Futures Options

*As SCM is not a market participant, we do not trade directly on Exchanges on your behalf. Therefore, when you use our trading services (SCM Services), this involves us arranging for market participants to enter into trades on the relevant Exchanges on your behalf, in accordance with the trading orders you place with us via the different Saxo trading platforms.

**SCM requires all clients to familiarise themselves with relevant Exchange Rules prior to engaging in any trading activity on any Exchange Trade Product. For guidance and information relating to any exchange traded rules, information may be available via our Website, alternatively please contact our Sales or Trading desk for assistance prior to trading in any Exchange Traded Product.

Fixed Income

- Bonds
- Sovereign, Government & Corporate

WHO WE ACT FOR

When you trade in the SCM Products (i.e. our OTC CFDs, FX Contracts, and Metals Contracts) we act as principal and we are the issuer of these products.

When you trade in Exchange-traded products with SCM (i.e. Listed Equities traded on a recognised Exchange, such as shares and ETFs, or Bonds) we will, as your agent, instruct market participants who will enter into trades on the Exchange, in accordance with your orders.

COSTS, FEES AND CHARGES

We may charge fees and other charges for the SCM Products and the SCM Services we provide to you. Description of the costs, fees and charges for the SCM Products and the SCM Services are as set out in the PDS and on our Website.

Other associated costs, fees and charges include (but are not limited to):

- Transaction/Commission Fees;
- Administration fees;
- Exchange access fees;
- Mark to market payments;
- Finance Charges;
- Carrying Costs;
- Holding fees;
- Currency Conversion calculation fees;
- Default interest on unpaid amounts or any negative balances in your Account:
- Minimum ticket fees;
- Dividends; and
- Bond trade commissions.
- Phone & email manual order fee.

DETAILS OF OUR CURRENT STANDARD TRANSACTION FEES, GENERAL ADMINISTRATIVE FEES AND CHARGES, EXCHANGE ACCESS FEES, DEFAULT INTEREST RATE, STANDARD MINIMUM TICKET FEES AND THRESHOLD AND BOND TRADE COMMISSIONS ARE AVAILABLE ON THE SCM WEBSITE AND ON THE TRADING PLATFORM

CHANGES TO COSTS, FEES AND CHARGES

All costs, fees and charges and other amounts payable are subject to change from time to time, although we will give you at least thirty (30) days' notice of any increase in fees or change in fee related information that will adversely impact you. We reserve the right to negotiate different fees and charges with different Clients.

INTRODUCING BROKERS

The fees and charges described in the FSG and PDS apply where you trade directly with SCM. If you trade with SCM through an Introducing Broker, that Introducing Broker may have its own fees and charges. Our Introducing Broker service allows Introducing Brokers to:

- receive a financial benefit from SCM for introducing new Clients to SCM; or
- pass on a financial benefit on behalf of the Client to the Introducing Broker.

Refer to your Introducing Broker's financial services guide, website, client directed payment schedule or contact your Introducing Broker for further information.

DISPUTE RESOLUTION AND COMPLAINTS HANDLING

SCM wants to know about any problems you may have with the services we provide to you so we can take steps to resolve the issue. If you have a complaint about an SCM Product or an SCM Service, please contact us via e-mail at ComplianceAU@saxomarkets.com, or put the complaint in writing and send it to:

The Compliance Officer

Saxo Capital Markets (Australia) Pty Ltd Level 25 2 Park Street Sydney NSW 2000

Saxo Capital Markets is also a member (No.12002) of the Australian Financial Complaints Authority (AFCA), a free, fair and independent dispute resolution scheme. If you are dissatisfied with the outcome of any response to a complaint raised, you have the right to lodge a complaint with AFCA, contact details are below. You may also make a complaint via the Australian

Securities and Investments Commission, free call Info line on 1300 300 630.The contact details for AFCA are:

Australian Financial Complaints Authority

GPO Box 3, MELBOURNE VIC 3001

Email: info@afca.org.au Toll free: 1800 931 678

Website: https://www.afca.org.au/

RECORDING OF PHONE CONVERSATIONS WITH SCM EMPLOYEES

SCM may record phone conversations between you and our employees. Such recordings, or transcripts from such recordings, may be used as evidence in any dispute or anticipated dispute between SCM and you.

CONTACT US

Saxo Capital Markets (Australia) Pty Ltd	
Registered office and	Level 25, 2 Park Street
business address	NSW 2000 Sydney
	Australia
Phone	+61 2 8267 9000
Email	ps@saxomarkets.com.au
Website	www.home.saxo/en-au

REMUNERATION AND BENEFITS FOR EMPLOYEES AND DIRECTORS

Our employees and directors are remunerated by way of salary and other employee benefits. They may also be eligible for a bonus which is based on achievement of predetermined business objectives such as contribution to profit, Client service, risk management and leadership/team contribution.

Bonuses may be calculated as a portion of the net amount charged to our Clients after deducting the amounts charged by our Hedge Counterparty providers.

OUR ASSOCIATIONS OR RELATIONSHIPS

We have a commercial business arrangement with our hedge counterparty provider, Saxo Bank A/S for both Exchange-traded and OTC financial products. Saxo Bank A/S is a related body corporate of SCM. Saxo Bank A/S provides us from time to time with support in relation to information technology (including for each Saxo Trading platform), finance and other services. Other arrangements with Saxo Bank are governed by formal agreements between us. The fees and charges that you pay to SCM may ultimately benefit other members of the Saxo Bank Group and their associates.

TRADING HOURS

Local Opening Hours:

Monday to Friday 8.00am - 5.30pm AEST

After Hours:

Outside of local opening hours, but at times when markets that SCM Products are traded are open, calls will be forwarded from our local office to another office within the Saxo Group.

SCM DOES NOT GIVE PERSONAL ADVICE

SCM will not give you any personal financial advice. You need to consider for yourself (or consult a financial adviser in relation to) the risks, benefits or suitability of any of the Products or Services offered by SCM.

All information provided is general in nature only and does not consider your personal objectives, financial situation and/or needs. If you require any financial advice, you should contact a suitably qualified financial adviser.

OPENING AN ACCOUNT

Applying for an account

You need to establish your Account by completing the relevant application form, which is available on SCM's Website. There are different application forms for different types of accounts.

SCM is subject to anti-money laundering laws (AML Laws) and is required to collect and verify the identity of the Client (including each authorised signatory of the Client, where applicable), before opening the Account. Each person who is authorised to trade and provide instructions on behalf of the Client (being an authorised signatory or an attorney under a power of attorney) will need to sign the application form and provide identification information to SCM before an Account will be opened.

After SCM accepts your application, your Account will be established. Your Account covers Products and Services offered by SCM, which you applied for in your application form and which SCM agrees to provide to you.

You can trade in the SCM Products and access the SCM Services through the using your Account through the Trading Platform. The legal terms governing your Account and your dealing in the SCM Products and/or SCM Services are set out in the General Business Terms.

Trading Account (sub-accounts)

Within your Account, you may have one or more Trading Accounts. A Trading Account is a sub-account of your Account for a specific method of dealing ((e.g. long-term trading vs. short term trading)). For example, you could have a Trading Account for each different currency denomination of the SCM Products

Version: 16 December 2019 Financial Services Guide that you deal in and a separate Trading Account for other SCM Products.

Do note that maintaining more than one sub-account may entail disadvantages as well, such as interest payable on negative balances in your Trading Account(s).

You can trade in the SCM Products and access the SCM Services through the different Saxo trading platforms. The legal terms governing your Account and your dealing in the SCM Products and/or SCM Services are set out in the General Business Terms.

Types of accounts

SCM offers the following type of Accounts, depending on the legal status of the Client:

- individual account;
- joint account;
- company account;
- trust account (includes self-managed super fund); and
- Other account types may be available, please speak to an SCM sales representative to find out more.

As SCM is obliged by law to take reasonable steps to ensure that the personal information provided by you, is accurate, up to date and complete, please inform us immediately if any of the personal information you have provided to us changes. We may request proof of identification for verification processes.

For further details regarding how we maintain your personal information, refer to our Privacy Policy available via our Website.

Anti- Money Laundering and Counter Terrorism Financing

SCM is subject to AML Laws and SCM is required to verify your identity before providing any Product or Services to you, and to re-identify you if it considers it necessary to do so. SCM will perform Know Your Client (KYC) checks for each person who is an authorised signatory of an Account including Attorneys. SCM is required to keep any documents, it receives to verify your identity for periods as may be mandated by applicable laws.

As a result of the measures and controls that have been implemented to ensure compliance with the AML Laws, SCM may decide to refuse any transactions on your account or to freeze your funds if there are reasonable grounds to suspect that the transaction breaches the law, and SCM will be not be liable for any loss you suffer (including indirect losses) as a result of its compliance with the AML Laws.

SCM has certain reporting obligations under the AML Laws and may be prevented from informing you that any such reporting has taken place. Where required by law, SCM may disclose the information gathered to regulatory or law enforcement agencies including AUSTRAC.

PROFESSIONAL INDEMNITY INSURANCE

Version: 16 December 2019 Financial Services Guide SCM has professional indemnity insurance in place which complies with the relevant provisions of the Corporations Act. This policy covers loss or damage suffered by retail clients due to breaches of any obligations on the part of SCM or our representatives in accordance with the Corporations Act.