

Pitcher Partners Investment Services Pty Ltd

Financial Services Guide



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This Financial Services Guide is an important document and should be retained for future reference. Please read it thoroughly and contact Pitcher Partners Investment Services Pty Ltd if you have any questions or require further clarification.

This document has been prepared for the exclusive use and benefit of Pitcher Partners Investment Services Pty Ltd (AFSL 229887), our clients and our Authorised Subscribers. It must not be used or relied on by any other person, without our prior written consent. Information is sourced from third parties and Pitcher Partners believes it to be reliable at the date of publication, although we cannot guarantee accuracy and reliability, nor do we accept responsibility for errors and omissions. The information, including opinions, estimates and forecasts contained herein are as of the date of publication and are subject to change without notice. Pitcher Partners is under no obligation to correct any inaccuracy or update the information. Any financial product advice contained in this document is general advice only and does not take into account your objectives, financial situations or needs. If you wish to acquire a financial product, we recommend you seek advice from a Pitcher Partners Investment Services' representative, and where applicable, consider the relevant offer document prior to making any financial decision. Before acting on anything contained in this document, you should speak to your Pitcher Partners Investment Services' representative and consider the appropriateness of the information or general advice having regard to your objectives, financial situation, or needs. If you act on anything contained in this document without seeking personal advice you do so at your own risk. To the maximum extent permitted by law, neither we, nor any of our representatives, will be liable for any loss, damage, liability, or claim whatsoever suffered or incurred by you or any other person arising directly or indirectly out of the use or reliance on this information, or any changes made to this document without our prior written consent.

Purpose of this *Financial Services Guide*

This Financial Services Guide ('FSG') is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with financial services. The matters covered by the FSG include who we are, how we can be contacted, what services we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures and how you can access them.

You have the right to ask us about our charges, the type of advice we will provide, and what you can do if you have a complaint about our services.

It is intended that this FSG will assist you in determining whether to use any of the services described below. This FSG has been authorised by Pitcher Partners Investment Services Pty Ltd (herein referred to as Pitcher Partners Investment Services).

You should also be aware that you are entitled to receive a Statement of Advice whenever we provide you with any advice which takes into account new or changed objectives, financial situations and needs. The Statement of Advice 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.

In certain circumstances, we may produce a Record of Advice which we may provide to you or which we will provide upon request. A Record of Advice may exist where the advice has not changed materially from previous advice or where personal circumstances remain much the same.

In the event that we make a recommendation that you acquire a particular financial product (other than securities) or offer to issue or arrange the issue of a financial product, we must also provide you with a Product Disclosure Statement or other disclosure document containing information about the particular financial product which will enable you to make an informed decision in relation to the acquisition of that financial product.





Who will be providing the financial services to me?

Pitcher Partners Investment Services Pty Ltd is a company that has been established since 1992. Pitcher Partners Investment Services is the provider of the financial services and has full responsibility for the service and advice you receive.



Contact us

Pitcher Partners Investment Services Pty Ltd

Level 13, 664 Collins Street,
Docklands VIC 300

p +61 3 8610 500

f +61 3 8610 5820

Who will provide financial services to me?

Your representative is responsible for the service and all advice you receive; however, they may be supported by an Associate Advisor and Client Service Administration staff. Your representative may introduce you to these staff so that you build a strong relationship with the whole team responsible for providing your services.

If necessary, your team will also use internal technical resources to ensure you get the best advice for your situation. In some circumstances the service you receive will be superannuation or banking specific and will not relate to one of the services mentioned above. Where this occurs, the service may be provided by a representative acting under a limited scope of authorisation.

Who will be acting on behalf of Pitcher Partners Investment Services?

Each representative holds a 'Certificate of Authorisation' that evidences the scope of their authorisation from Pitcher Partners Investment Services – that is, the products that they can give advice and deal in. They should provide a copy of this certificate if requested by you. The scope outlined in this certificate depends on the services authorised to be provided by the representative and the attainment of minimum training, skills and product knowledge as required by ASIC.

Most Senior Advisors of Pitcher Partners Investment Services have obtained their CERTIFIED FINANCIAL PLANNER® qualification or are currently completing this qualification. All advisors are members of the Financial Advice Association Australia (FAAA) and they all hold relevant additional tertiary and/or industry qualifications. Associate Advisors are also expected to be tertiary or industry qualified and/or working towards the attainment of professional status within the financial planning industry. Your Advisor will also be supported by technical advisors with expertise in the areas of investment research, taxation and superannuation.

Between them, our representatives hold memberships with the Securities Institute of Australia, the Financial Advice Association Australia, Chartered Accountants Australia and New Zealand, CPA Australia and the Responsible Investment Association Australasia. Pitcher Partners Investment Services is also a member of the Responsible Investment Association Australasia.

How will my representative be paid?

Representatives may be Partners of Pitcher Partners and/ or employees of Pitcher Partners Advisors Pty Ltd. Partner representatives are full equity partners and receive income in relation to their share of the partnership. Employee representatives receive the majority of their income as a base salary which is adjusted on an annual basis to reflect their skills, experience and contribution. They may also be entitled to bonuses should they meet and exceed a range of employment related criteria.

Financial Services at Pitcher Partners *Investment Services Pty Ltd*

What kind of financial services do you provide

Under our licence, Pitcher Partners Investment Services is authorised to offer you the following types of financial services:



Provide financial product advice



Deal in a financial product by applying for, acquiring, varying or disposing of financial products on your behalf



Provide custody or depository services except for investor directed portfolio services

More detail about the way that Pitcher Partners Investment Services provides these services follows:



Portfolio Management Service

This service is aimed at investors who have or wish to build a diverse investment portfolio. The service is a tailored, proactive, ongoing and intensive investment management and monitoring service that includes:

- Risk profiling, needs analysis and formulation of investment strategies;
- Review of existing investments;
- Recommendation of new investments;
- Purchase and sale of investments;
- Priority allocations in new issues, floats and placements;
- Opening and operating bank accounts on your behalf;
- Pro-active management of and advice in respect to 'At Call' and term deposit accounts;
- Receiving and recording all interest, dividends and other distributions on your investments;
- Pro-active advice on all corporate actions – mergers and acquisitions, capital reconstructions, buybacks, rights issues, entitlements, etc;
- Pro-active advice between reports identifying investment opportunities and risks that may arise;
- Provision of quarterly reports including economic and financial market commentary, capturing detailed information on all transactions for income tax and capital gains tax purposes; and
- Regular meetings to review and discuss performance outcomes.

NOTE This service is a non-discretionary service and therefore all transactions will only be undertaken after receipt of written instructions from you. Activities not included within the scope of this service will incur additional fees. Such activities will only be undertaken upon your instructions and fees will be agreed with you before commencing any work.



Strategic Investment Advice

Pitcher Partners can also provide 'one-off' investment advice that includes:

- Determining an appropriate investment strategy for your needs and objectives;
- Effective investment structures;
- An analysis of your existing asset allocation and the suitability of current investments;
- The recommendation of alternative investments for your consideration; and
- The implementation of agreed recommendations on your behalf.

This Strategic Investment Advice does not include ongoing advice, administration or monitoring of any investments that we recommend.



Strategic Financial Planning

This service is aimed at individuals that require financial planning advice. The focus of this service is on long-term structural and planning strategies and may include the following:

- Determining the level of funding required to attain goals;
- Recommending an appropriate investment strategy and the suitability of individual investments to achieve these goals;
- Taxation planning;
- Cash flow and debt management;
- Superannuation and retirement planning;
- Effective investment structures, e.g. company, family trust, self-managed superannuation;
- Asset protection;
- Insurance and risk management;
- Estate planning including wills, powers of attorney, testamentary trusts; and
- Savings plan investment recommendations.



Custody and Depository Service

Pitcher Partners Investment Services is licensed to provide custody and depository services to clients. This helps us to provide our other financial services and to administer your investment portfolio more efficiently.

As an incidental custodian, Pitcher Partners Investment Services has appointed BNP Paribas SA. The sub-custodian is a specialist custodian holding an Australian Financial Services Licence and is required to meet Net Tangible Asset and liquidity requirements.

Under a custody or depository service, Pitcher Partners Investment Services holds legal title to the assets. While the legal title is with Pitcher Partners Investment Services, the assets are held beneficially for the investor. Pitcher Partners Investment Services ensures that any entitlements are accounted for correctly in respect to the assets held beneficially on your behalf.

Pitcher Partners Investment Services uses an omnibus account held with BNP Paribas when transacting on your behalf. An omnibus account is an account in which money or investments for more than one beneficial owner are co-mingled. Pitcher Partners Investment Services is not able to lend or encumber the assets held for you.



Other Services

In limited circumstances we may also provide advice in relation to superannuation, the opening of bank accounts and the establishment or roll-over of term deposits and commercial bills.

Where we identify a risk or opportunity, we may also recommend that you give further consideration to strategic superannuation advice, retirement strategies, taxation strategies, life insurance, general insurance, cash flow management, budgeting, debt management, estate planning, philanthropic solutions, succession planning or other financial planning strategies. Should this occur, we may seek your approval to provide further advice or refer you to a specialist who can assist. In such instances, we may scope this work and obtain your consent before proceeding.

We may utilise outsourced service providers and cloud computing service providers, including:

Iress Limited

Iress Limited is an Australian technology company specialising in software solutions for the financial services industry.

In providing our portfolio management service to you, Pitcher Partners Investment Services utilises various Iress products such as Xplan software for client and portfolio management, Iress Order System software for trade order management, Iress Pro software for market data and trading and Client Portal software for online client management. Iress hosts data on Amazon Web Services (AWS) servers located within Australia.

Other third parties

From time to time and as separately notified to you.

To perform the services, we may provide these third parties with access to your data to the extent that is required to perform the service.

Your data will be stored in servers physically located in Australia (unless otherwise specified) and in accordance with the security practices of the third-party service provider and our Privacy Policy.





Fees

How will I pay Pitcher Partners Investment Services for the services provided to me?

Pitcher Partners Investment Services will charge a fee directly to you. Our fees are calculated as follows:

Portfolio Management Service (PMS)

The base fee for the Portfolio Management Service is 1.2% per annum plus GST (minimum of \$12,000 p.a. (excl. GST)) of the market value of the portfolio (excluding cash, term deposits, bank bills and direct property).

The minimum size portfolio for this service is \$1M and the fee is payable quarterly in arrears. The fee reduces as the invested portfolio increases as shown below:

Invested Portfolio	Fee (%pa) excluding GST
>\$1M	1.2%
>\$2M	1.1%
>\$3M	1.0%
>\$5M	0.9%
>\$7.5M	0.8%
>\$10M	0.7%
>\$20M	0.6%
>\$30M	0.5%
>\$45M	0.4%
>\$60M	0.3%
>\$75M	Negotiable

Our scale is not stepped and is a 'one rate' service. The Portfolio Management Service fee is applied to all the investment portfolios in your family group – superannuation fund, family trust, companies, personal names – thus providing the opportunity for significant fee savings.

We reserve the right to charge a fee for investments that do not appear on the Pitcher Partners Investment Services authorised investments lists. A minimum annual fee of \$12,000 plus GST applies to the quarterly Portfolio Management Service.

Fees (continued)

Example Fee Calculation – PMS Service

At 31 December Joe has a total of \$3.7 million in his Family Trust and Superannuation Fund portfolios, of which \$120,000 is in bank accounts and \$380,000 is in term deposits. The remainder is split equally between managed funds and listed securities.

Joe's PMS fee for the quarter is calculated as follows:

Asset	Funds	Fee (%)	Amount (\$)
Bank Accounts	\$120,000	Nil	\$0
Term Deposits	\$380,000	Nil	\$0
Managed Funds & Listed Securities	\$3,200,000	1.0% (excl. GST)	\$32,000 per annum
Quarterly Fee (per annum fee ÷ 4)			\$8,000 (excl. GST)

Strategic Investment Advice

Our fee is time-cost based and will depend on the scope of the engagement. Whilst much of this work will be time cost, we may negotiate a fixed cost fee arrangement in some circumstances. Regardless, wherever possible, estimated fees for this service will be provided before we commence any work. Fees are normally payable after completing the work, however, where the work extends over a period in excess of four weeks, Pitcher Partners Investment Services Pty Ltd reserves the right to raise interim invoices.

Strategic Financial Planning

This service will be based on hourly rates and will vary depending on the scope of the work undertaken. Whilst much of this work will be time cost, we may negotiate a fixed cost fee arrangement in some circumstances. Regardless, wherever possible, estimated fees for this service will be provided before we commence any work. Fees are normally payable after completing the work, however, where the work extends over a period in excess of four weeks, Pitcher Partners Investment Services Pty Ltd reserves the right to raise interim invoices.

Other

In some instances, fees may be payable to Pitcher Partners or others in relation to annual accounts preparation, income tax and other annual compliance requirements associated with any structures that you may have established to hold your investments. Wherever possible, estimated fees will be provided to you prior to undertaking related work.

Investment Fees

Additional investment fees such as Management Expense Ratios (MERs) and performance fees may be charged by a fund or investment manager. These fees are typically deducted directly from your investment.

Transaction costs including brokerage may also be charged to or deducted from your investments at the time of the transaction. These fees are normally charged directly by the broker, either as an addition to your purchase cost or a deduction from your sale proceeds.



Privacy Statement

Pitcher Partners Investment Services collects personal information from you that enables us to tailor our advice to meet your needs when providing investment advisory and portfolio management services.

We may also need to collect personal information to satisfy our legal obligations. For instance, prior to undertaking any investment transaction, such as opening a bank account, we must obtain and hold proofs of identity, such as a driver's licence, and establish the source of funds to satisfy the requirements of the Anti-Money Laundering/Counter-Terrorism Financing legislation. We will also generally retain Tax File Numbers, bank account details, addresses including email address, phone numbers, dates of birth and other personal information that will be required for day-to-day portfolio administration. This information may be supplied to third parties for the purpose of undertaking an investment transaction on your behalf and/or satisfying legislative requirements.

In addition to these basic requirements, we may seek information that enables us to work with you to achieve your retirement, estate planning, succession planning, insurance or a number of other personal wishes, goals and needs. This information will generally be obtained from a Client Questionnaire and discussions with you directly. We will not normally collect personal information from a third party, but if this is required, we will seek your consent before doing so. If you do not provide this personal information to us, we may make recommendations to you that are not appropriate for your financial circumstances, needs or objectives.

We may also request information about your personal interests so that we can consider events or functions that might be of interest to you. You do not need to provide this additional information if you do not wish.



Pitcher Partners is committed to ensuring the confidentiality and security of your personal information in accordance with the Australian Privacy Principles.

Our Privacy Policy, which includes details about how to access and correct personal information or how to complain about a privacy breach, is available on our website but may also be made available to you upon request.

Pitcher Partners Privacy Policy

Pitcher Partners is an association of independent firms located in Melbourne, Sydney, Perth, Adelaide, Brisbane and Newcastle. In this Privacy Policy, 'Pitcher Partners', 'we', 'us' and 'our' refers to any entity owned or controlled by a Pitcher Partners firm.

At Pitcher Partners, we recognise the importance of protecting and maintaining your personal information. We appreciate that you may have concerns about your privacy and about the security, accuracy and confidentiality of personal information. Pitcher Partners is committed to providing you with the highest quality professional service whilst also protecting your privacy. Pitcher Partners abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the Privacy Act 1988.



1 Open and transparent management of personal information

Pitcher Partners manages personal information in an open and transparent way by complying with the Australian Privacy Principles. We will remain open with you about what sort of personal information we hold, how we collect it, and for what purposes we use and disclose this information.

The Pitcher Partners' Privacy Policy is available on our website or may be obtained by contacting the Privacy Officer. If you have any queries or complaints about Pitcher Partners' compliance with the Australian Privacy Principles, please contact the Privacy Officer using the 'How to Contact Us' information shown below.

If you believe that Pitcher Partners has breached the Australian Privacy Principles, please contact the Privacy Officer in writing. We will respond to you within 30 days. If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner.

2 Anonymity and pseudonymity

When engaging with Pitcher Partners, you have the option of not identifying yourself or you may use a fictitious name. At times this may not be practicable because we need personal information to provide services to you and if you do not provide the information requested, we may be limited in our dealings with you. If it is important to you, and your identification is not required by us, you may request that we deal with you anonymously or by using a pseudonym.

3 Collection of solicited personal information

Our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information. This might include:

- name and contact details
- date of birth and gender
- bank account details
- employment details and employment history
- documentation used for identification and verification purposes
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, investments, insurance cover and superannuation

Some personal information is considered to be 'sensitive information'. It may be necessary in some instances for Pitcher Partners to collect sensitive information about you, for example, your Tax File Number, professional memberships and health information.

Pitcher Partners will collect information that is reasonably necessary for the primary purpose of providing a professional service to you and also for complying with our legal obligations. If this information is considered sensitive, then unless the law provides otherwise, Pitcher Partners will also require your consent to the collection of this sensitive information. We will only collect sensitive information if it is necessary to provide our services to you.

Pitcher Partners will collect personal information in a fair and lawful manner. In most instances, we will collect personal information from you unless it is unreasonable and impracticable to do so.

4 Dealing with unsolicited personal information

If Pitcher Partners receives unsolicited personal information that we know could have been collected from you, we will afford it the same privacy protection as if we had solicited this personal information. If the information is not reasonably necessary for one or more of Pitcher Partners' functions or activities or we know that we could not normally have collected the personal information, we will destroy or de-identify the information as soon as practicable, unless it is unlawful or unreasonable to do so.

5 Notification of the collection of personal information

Pitcher Partners will endeavour to collect personal information directly from you, however, at times Pitcher Partners may need to collect personal information from a third party and when this occurs, we will inform you. We will also be clear about the purpose of the collection, who we might disclose this information to, whether the personal information is required under an Australian law or a court/tribunal order and the main consequences of not collecting this information.

In some circumstances, Pitcher Partners uses third party service providers to carry out part of the services we provide to you. These service providers are typically located in India and the Philippines.



6 Use or disclosure of personal information

Pitcher Partners will not use or disclose personal information collected by us for any purpose other than the primary purpose for which it is collected, unless you would reasonably expect us to use or disclose the information for a secondary purpose or your consent has been obtained to use the information for additional purposes. Exceptions to this include where disclosure is:

- required by superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and recommendations made by us
- required by law or for inspection to ensure compliance with mandatory professional standards
- required by reporting entities for the purpose of complying with the Anti-Money Laundering and Counter-Terrorism Financing legislation
- reasonably necessary to assist a law enforcement agency
- external service providers for the purposes of audit, peer reviews, legal advice, consultancy, outsourced administration, issuing statements or handling mail
- permitted under the Australian Privacy Principles

Where Pitcher Partners has collected the information from you, we may use this information for the purpose of direct marketing.

7 Direct marketing

Pitcher Partners may use or disclose the personal information we hold about you for the purpose of direct marketing, such as articles that may be of interest to you, if there is a reasonable expectation that your personal information will be used for this purpose and you have not opted out of receiving direct marketing communications from us, or where you have provided your consent. Pitcher Partners will not directly market to you using information that is considered sensitive unless you have provided consent.

8 Cross-border disclosure of personal information

Pitcher Partners may transfer or store your personal information outside Australia. If we engage with or are required to send personal information to an overseas entity to fulfil the purpose for which the personal information was collected (or a related or ancillary purpose), we may seek your consent with regards to the disclosure. If we do disclose personal information to an overseas recipient without your consent, we are required to take reasonable steps to ensure that this recipient does not breach the Australian Privacy Principles or a similar applicable law in relation to that information.

9 Adoption, use or disclosure of government related identifiers

Pitcher Partners will not adopt, use or disclose government agency identifiers, for example, tax file numbers, as our primary means of identifying you unless it is required or authorised by or under an Australian law or a court/tribunal order.

10 Quality of personal information

Our goal is to ensure that, at all times, the personal information we collect, hold, use or disclose is up to date, accurate and complete. We will take reasonable steps to correct personal information. If you become aware, or believe, that any personal information we hold is inaccurate, incomplete or out of date, please contact your relationship manager or the Privacy Officer at the details provided below.

11 Security of personal information

Pitcher Partners takes the security of your personal information very seriously. We have implemented significant measures and precautions to protect the personal information we hold (electronic and physical) from such risks as misuse, interference and loss, and from unauthorised access, modification or disclosure. We take reasonable steps to destroy or permanently de-identify any personal information no longer required.



12 Access to personal information

Individuals may at any time request access to personal information that Pitcher Partners holds about them. Where possible, we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. If Pitcher Partners were to refuse to give access to the personal information, or in the manner requested, we will provide written notice of the reasons (unless unreasonable to do so) and details should you wish to complain about the refusal. Generally, a refusal will only be in cases where denying such access is permitted under the Australian Privacy Principles or is otherwise lawful.

All requests for access to personal information should be in writing to the Privacy Officer. We will respond to your request within a reasonable period (but not more than 30 days) after the request is made. Pitcher Partners may charge a fee for supplying personal information.

13 Correction of personal information

If Pitcher Partners holds information about you for a purpose and knows that the information is inaccurate, out of date, incomplete, irrelevant or misleading we will take steps to correct the information. If you request us to correct the information, we will take reasonable steps to do so. If a third party is relying on this information, at your request we will also notify them, unless it is impracticable or unlawful to do so.

If we refuse to make a correction, we will let you know why and the complaint mechanisms that are available to you. If we continue to use this information, you may request us to associate a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

All requests for correction to personal information should be in writing to the Privacy Officer. We will respond to your request within a reasonable period after the request is made. We will not charge you for making the request for the correction of personal information.

Privacy on our website

When you visit any part of our websites, we collect statistical data about that visit (e.g. what you looked at, the way in which you moved around the site, etc.) which is not personally identifiable. We use this information for statistical purposes and to improve our website. We generally only collect personal information from our website when it is provided voluntarily by you.

How to contact us

All requests for access or correction to personal information, privacy complaints, requests for access to personal information, queries in relation to this Privacy Policy, or any other privacy related matter, should be directed to the Privacy Officer at Pitcher Partners as follows:



The Privacy Officer

Pitcher Partners

m GPO Box 5193, Melbourne VIC 3001

p +61 3 8610 5363

f +61 3 8610 5820

e privacy@pitcher.com.au

Your enquiry may be directed to the Privacy Officer of the firm within the Pitcher Partners association that services your needs.

We will respond to your request within a reasonable time and in accordance with the requirements of the Privacy Act.

If you have made a privacy complaint and believe that Pitcher Partners has not adequately handled your complaint, you may complain to the Office of the Australian Information Commissioner:



Office of the Australian Information Commissioner

GPO Box 5218, Sydney NSW 2001

p 1300 363 992

e enquiries@oaic.gov.au



Frequently Asked Questions

Under its Australian Financial Services (AFS) licence, what products is Pitcher Partners Investment Services authorised to give advice and deal in?

Advice

Under its AFS licence, Pitcher Partners Investment Services is authorised to provide financial product advice to both retail and wholesale clients. The products for which this authorisation covers are listed below:

- Securities
- Managed Investment Schemes, including IDPS
- Superannuation
- Retirement Savings Account Products
- Derivatives
- Deposit and Payment Products (including Basic Deposit, Non-basic Deposit and Non-cash Payment)
- Government Debentures, Stocks or Bonds
- Life Products – Investment Life Insurance Products
- Life Products – Life Risk Insurance Products
- Standard Margin Lending facilities

Deal

An authorisation to deal in financial products allows Pitcher Partners Investment Services to apply for, acquire, vary or dispose of financial products on your behalf.

The following lists summarise the product authorisations that have been granted for a dealing service:

- Securities
- Managed Investment Schemes, including IDPS
- Superannuation
- Retirement Savings Account Products
- Derivatives
- Deposit and Payment Products (including Basic Deposit, Non-basic Deposit and Non-cash Payment)
- Government Debentures, Stocks or Bonds
- Standard Margin Lending facilities

Custodial and Depository Services

An authorisation to hold interests in financial products on your behalf. Pitcher Partners Investment Services holds this authorisation to facilitate its financial advisory and dealing services. Pitcher Partners Investment Services is an incidental custodian and has appointed BNP Paribas SA, a specialist licensed custodian which meets regulatory requirements in relation to asset backing and liquidity, to hold the assets.

Who does my advisor act for when providing financial services to me?

Your advisor will be acting as a representative of Pitcher Partners Investment Services who, as licensee, will be responsible to you for all services your advisor provides.

How is my representative paid by Pitcher Partners Investment Services?

All Pitcher Partners Investment Services' representatives are salaried employees and as such, do not retain commissions, fees or any other form of benefit or advantage arising out of recommendations made to you. Advisors may receive bonuses in addition to their salary if they meet or exceed broadly based performance targets.

Under the Corporations Law, the licensee and its representative have a duty to disclose details of any interest that they may have, whether financial or otherwise and whether direct or indirect, in the making of recommendations. Whilst we attempt to avoid conflicts of interest at all times, if there is a potential conflict of interest we will disclose this information to you when we make recommendations.

Besides the agreed fee structure, do you receive gifts or benefits in relation to providing the financial services to me, and if so, how is that calculated?

Pitcher Partners Investment Services may occasionally receive small non-monetary benefits (such as tickets to sporting events) from fund managers, platform providers, product manufacturers or other third parties. Should Pitcher Partners Investment Services receive a benefit, we will record the benefit in a register that can be made available upon request.



Do any relationships or associations exist which might influence you in providing me with particular financial services?

Your Pitcher Partners Investment Services' representative is a salaried employee and does not retain commissions, fees or any other form of benefit or advantage arising out of recommendations made to you. Advisors may receive bonuses in addition to their salary if they meet or exceed broadly based performance targets.

At any time that we are or become aware of an existing relationship or association with any recommendations that we have made, we will disclose this relationship to you.

Pitcher Partners may also provide services to companies and fund managers who appear on our Approved Securities List and Approved Product List. Where such a relationship is known, we will disclose the nature of these services at the time of making a recommendation.

What type of research do you conduct as part of providing me with financial services?

Pitcher Partners Investment Services conducts up-to-date research regarding the economy, products in the investment market, product performance, the various investment markets and their respective performance and legislative/regulatory changes.

With regard to investments, Pitcher Partners Investment Services maintains approved product lists whereby it conducts regular due diligence on fund managers, including qualitative interviews, assessing investment processes, quality of personnel and financial stability. Quantitative analysis is also conducted on performance and risk.

An approved securities list is maintained using market and broker consensus data on selected ASX200 securities.

Will you give me advice, which is suitable to my needs and financial circumstances?

If you choose Pitcher Partners Investment Services to be your advisor, we will ask you to complete a comprehensive, but strictly confidential, client questionnaire covering your particular objectives, financial situation and needs. If you do provide all relevant information to us, we can provide completely customised individual investment advice.

However, you have the right not to divulge some or all information to us, if you do not wish to do so. In that case, where we make either general or limited investment recommendations, we are required to warn you about the possible consequences of us not having your full personal information and you should consider those warnings carefully.

A Statement of Advice (SoA) will be supplied to you when we provide initial advice, at any time that our advice relates to matters that are new or substantially different from our agreed service, or at any time that your personal needs or circumstances have changed. A Record of Advice (RoA) may also be produced in circumstances where the advice is not

significantly different from the basis on which the previous advice was given. You may request copies of previous advice for up to seven years after the advice is given. These requests should be made in writing to your advisor, and you should allow at least five working days for us to respond.

What should I know about any risks of the financial products or strategies you recommend to me?

To help us to better understand your risk profile, we may ask you to complete a Risk Tolerance Questionnaire. This questionnaire can then be used as a guide to understand the types of investments and strategies that may be suitable for you.

We will explain to you any significant risks of financial products and strategies that we recommend to you as well as provide you with specific advice. You have the right to inquire about the risks associated with any advice or recommendations and we encourage you to ask us to explain or expand if you feel that the issue of risk has not been adequately covered.

The better your understanding of risk, the more informed your investment decisions will be and the more likely that you will be able to meet your financial goals and objectives. Following, we have provided some general information about the risks of investing:

- In the investment context, risk is related to both the uncertainty of 'income' returns for the investment and the change in the value of the capital invested. A significant risk also is the purchasing power of both income returns and capital over time.
- Generally, the higher the level of risk you are prepared to accept when investing, the higher the potential return. At the same time, the potential loss will also be higher. This is known as the risk/reward trade-off.
- Generally, the greater the time period over which you are investing, the greater your ability to withstand risk. Time tends to even out the short-term volatility in income returns and in capital values of most investment asset sectors.

Can I provide you with instructions and tell you how I wish you to buy or sell my financial products?

Yes, you have the right to specify how you would like to give us instructions. For example, by telephone, fax or by other means. As we provide a non-discretionary service, we require all buy and sell instructions to be confirmed in writing.

Does Pitcher Partners Investment Services maintain adequate Professional Indemnity Insurance Cover?

Pitcher Partners Investment Services complies with the minimum compensation and insurance arrangements for Australian Financial Services licensees, as required under ASIC Regulatory Guide 126 and s912B of the Corporations Act 2001.



Complaint Resolution

Who can I complain to if I have a complaint about the provision of the financial services to me?

Pitcher Partners Investment Services is committed to providing the highest quality of financial planning and investment advisory services to its clients and, as part of that commitment, to respond to any complaints promptly, fairly and effectively. We have developed an internal complaint resolution policy and complaint handling procedures that complies with Australian Standard AS/NZS 10002:2014 Guidelines for Complaint Management in Organizations and with ASIC Regulatory Guide RG271: Internal Dispute Resolution.

The PPIS Public Complaints Management Policy is published on the PPIS website and can be accessed using the below link: <https://www.pitcher.com.au/advice-for-me/wealth-management/investment-advice/melbourne-investment-services/>

The policy provides details on how you may lodge a complaint with us, options available to assist you with complaints (if you need additional assistance) and PPIS' key steps for dealing with complaints including assessment, investigation and complaint resolution.



Contact the advisor directly and tell them the nature of your complaint, giving them an opportunity to resolve the complaint immediately. The advisor may refer the complaint to your relationship partner or the divisional partner-in-charge for their input in finding a resolution.



If your complaint has not been satisfactorily resolved within ten business days, please contact Michael Hay, Partner of Pitcher Partners, on (03) 8610 5000 or put your complaint in writing and send it to him at GPO Box 5193, Melbourne Vic 3001. He will then seek to resolve your complaint.



If you still do not get a satisfactory outcome within 30 calendar days of the first notification of your complaint to us, you have the right to lodge a complaint with AFCA at GPO Box 3, Melbourne, Victoria, 3001. Their phone number is 1800 931 678. This service is provided to you free of charge.

We are also a member of the Australian Financial Complaints Authority (AFCA), a not-for-profit, approved external complaints resolution scheme which provides a free consumer service.

If you have any complaint about our services, the following steps should be taken:

The Australian Securities and Investments Commission (ASIC) also has a freecall Infoline 1300 300 630 which you may use to obtain information about your rights.

If your complaint relates to a breach of our Privacy Policy or the Australian Privacy Principles, the matter should be referred to The Privacy Officer, Pitcher Partners, GPO Box 5193, Melbourne VIC 3001



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