

Financial Services Guide (FSG)

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Version 3.0

Jade Capital Partners Pty Ltd
Level: 4, 20 Bond Street
Sydney NSW 2000 Australia

Telephone: 1300 859 322
www.jadecapital.com.au
info@jadecapital.com.au

1. ABOUT THIS FINANCIAL SERVICES GUIDE (FSG)

This Financial Services Guide is designed to provide you with important general information regarding our services and is generally issued prior to providing you with any of our financial products or services. The information contained within this guide includes the following:

Who we, Jade Capital Partners Pty Ltd. ABN 88 153 326 222 (Jade Capital Partners) are and how you can contact us;

- The services we are authorised to provide to you;
- How you can communicate with us;
- How we are remunerated for these services;
- Conflicts of interests
- The statements you will receive;
- Our internal and external dispute resolution processes; and
- How we deal with your personal information.

This FSG was prepared on the 1st of December 2015. All information contained in the FSG has been obtained from sources believed to be accurate. Please contact us if you would like further information on this FSG or on any of our services.

2. FINANCIAL SERVICES WE CAN OFFER

We hold Australian Financial Services License number 425895 and we are authorised to provide the following financial services to both retail and wholesale clients:

This licence authorises the licensee to carry on a financial services business to:

- (a) Provide financial product advice for the following classes of financial products:
- (i) Deposit and payment products limited to:
 - (A) Basic deposit products;
 - (ii) Derivatives;
 - (iii) Foreign exchange contracts;
 - (iv) Interests in managed investment schemes excluding investor directed portfolio services;
 - (v) Interests in managed investment schemes limited to:
 - (A) MDA services; and
 - (vi) Securities; and
- (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:
 - (A) Interests in managed investment schemes limited to:
 - (1) MDA services; and
 - (ii) Applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (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;

- (E) Interests in managed investment schemes limited to:
 - (1) MDA services; and
- (F) Securities;

3. FINANCIAL PRODUCTS WE OFFER ADVICE ON

Jade Capital Partners offers its Customers advice and/or transaction services on the following financial products:

- Spot and forward foreign exchange contracts;
- Margin foreign exchange and margin foreign exchange options in respect of all major currencies and currency crosses (Margin Contracts);
- Contracts for Difference (“CFDs”) in respect of equities, currencies, bullion, commodities and indices;
- Exchange traded Securities
- Exchange traded Derivatives
- Non-Exchange Traded Derivatives (Over-the-Counter or OTC products)
- P&L currency conversion and transfer payment information and support; and
- Such other products as are notified to you from time to time.

4. OUR ADVICE POLICY

Transactional Broking (Broking or Dealing) - Jade Capital Partners does not provide personal advice in relation to financial products such as securities, derivatives and foreign exchange contracts where we act in a broking or dealing capacity. Any general advice we provide to you as a retail client, when we are acting in a broking or dealing capacity, does not take account of your personal circumstances. In this instance, you should seek independent professional advice to ascertain whether our advice and the financial products you are dealing in are appropriate for your circumstances. Newsletters, trade alerts and research papers are examples of general advice we may provide to you.

Managed Discretionary Account (MDA) – We are authorised to provide MDA services. Where appropriate Jade Capital Partners, having considered your personal circumstances, needs and objectives, we will provide you with specific personal advice and issue you with an MDA services contract. These services will be conducted following an investor evaluation and a resulting Statement of Advice (SOA) being issued to you. A fundamental feature of an MDA service is that you provide authority to someone else (your investment adviser i.e. Jade Capital Partners) to invest in financial products on your behalf without prior reference to you for each individual transaction.

When providing this MDA service to you we are required to adhere to an agreed up investment program outlining a range of parameters that have been tailored to your personal circumstances.

Before taking any action to acquire any of the financial services mentioned in this FSG you should consider whether the service is appropriate having regard to your Personal Circumstances. You should also ensure that you understand the risks associated with the financial services you enter into with Jade Capital Partners.

You will be provided direct access to the MDA so you can review all transactions and the implementation of the investment program. The investment program will be reviewed annually to determine if it is still appropriate for you.

The key risks to be considered when authorising an MDA service:

- Authority may be used to invest in assets which may not suit your objectives, needs and risk level
- Authority may be used to invest in assets that may be unsuitable to you from a social or ethical position
- You may be subject to financial losses for investment decisions made, and
- We may exercise discretion in relation to corporate actions that may not be suited to your requirements.

We have implemented internal control mechanisms to manage the above risks. The issued SOA and/or the investment program provided to you with your MDA Services contract sets out details of how the above risks are managed.

This FSG complies with the conditions applicable to provision of MDA services as determined by ASIC, and in particular Division 2 of Part 7.7 of the Corporations Act 2001 and ASIC Class Order CO 04/194.

5. USING OUR SERVICES

If you wish to utilise Jade Capital Partners services you may issue instructions in person, in writing, by email, via the telephone or via such other method as may be mutually agreed between us, unless we tell you that instructions can only be given in a particular way. Instructions, given to us whether they confirm or revoke an instruction, commitment or notice of request do not take effect unless actually received by us through an agreed communication method.

Self directed clients may place instructions via one or more designated trading platforms. Any order restriction times will be governed by the terms and conditions set out by the relevant platform provider (3rd party execution & clearing broker). If placing by telephone you may do this during Australian business hours 8:30am – 5:30pm Monday to Friday AEST.

Before you log onto any trading platform to deal in a financial product or ask us to deal in a financial product by telephone, it is important that you understand the risks, costs and benefits of dealing in that financial product. For information on the risks, costs and benefits related to specific financial products you should turn to the relevant product issuers Product Disclosure Statement (PDS) Document.

6. OTHER DOCUMENTS YOU MAY RECEIVE

General transaction documents - We will provide you with the relevant documentation to facilitate the requested transactions. These may include, but not be limited to client agreements, account opening applications, and deal confirmations.

Factual information - We can provide you with written factual information regarding current or historical market rates.

7. WHO WE ACT FOR

Jade Capital Partners is responsible for the financial services we provide to you under our Australian Financial Services License. Jade Capital Partners acts as an agent and/or an advisor and/or a dealer when you utilize our financial services. Accordingly, Jade Capital Partners is not a market maker and therefore does not act as the principal in any transactions with you.

8. WHAT OUR SERVICES COST YOU

Specific transaction fees are customised to each individual client however typically our managed accounts (MDAs) operate on a percentage per annum fee plus a percentage of positive performance.

For example: ... an MDA investment account may have a “2 & 20” fee structure that indicates the account attracts a 2% annual portfolio administration fee calculated daily and a 20% of the net positive profit performance (after any applicable transaction costs).

Another example: ... an MDA investment account may have a “Brokerage & Performance” only fee structure, i.e. no administration fee. This structure is commonly used for our OTC Derivatives such as managed margin FX/CFD strategies. In this case there would be a clearly defined brokerage rate (say \$10 per standard lot per side) plus a performance rate (say 25% of the net positive profit performance)

Performance fees on any Jade Capital Partners MDA products are calculated monthly on a “High Water Mark” basis, meaning the highest portfolio balance calculated net of all fees on your investment account. If the portfolio balance is below that High Water Mark no Performance fees will be charged that calendar month.

It is important to understand that you will be issued with a specific fee structure tailored to your investment via your MDA services contract and your investment program contained in your Statement of Advice.

The common fees and charges when dealing in financial products can include the following:

- Payment of margin & margin adjustments;
- Rollover charges;
- Interest charges;
- Commission or transaction brokerage; and
- Administration fees and performance fees.

9. REMUNERATION OF OTHER BENEFITS RECEIVED BY OUR EMPLOYEES

Directors, employees, and representatives of Jade Capital Partners and their associates may receive remuneration for the advice and execution services that Jade Capital Partners provides to you. Any remuneration distributed will be wholly discretionary and is assessed by the directors of Jade Capital Partners as part of the overall success of the business and the adviser’s contribution to that success. No adviser is remunerated for providing specific advice that may result in one financial product being recommended over another.

10. REFERRAL BENEFITS FOR OTHER SERVICES PROVIDERS

You may have been referred to us by a service provider who may receive financial or nonfinancial benefits from us. These should have been disclosed to you by that service provider. Please note that such benefits will not impact transaction fees or margins payable for transactions undertaken with Jade Capital Partners. We will provide details of any referral benefits that relate to your transactions on your reasonable request prior to us providing you with any of our financial services. We may share charges or benefits with our associates or other third parties or receive remuneration from them in respect of transactions we enter into with you. We may share such amounts with introducing advisers and referrers for the introduction or referral of Clients to us.

11. DISCLOSURE OF ANY RELEVANT CONFLICTS OF INTEREST

We do not have any relationships or associations which might influence us when providing you with our services. Should such conflicts of interest arise, Jade Capital Partners will give priority to your interests as a client over the interests of our associates.

12. MAKING A COMPLAINT

Jade Capital Partners has an internal dispute resolution process in place to resolve any complaints or concerns you may have, quickly and fairly. These should be directed to our Complaints Officer who will seek to resolve your complaint within 30 days. Complaints can be made by telephone, email or letter at the address and telephone numbers provided in section 16 below.

If you are dissatisfied with the outcome, you have the right to lodge a complaint with the Financial Ombudsman Services (FOS).

FOS is an approved external dispute resolution scheme, of which Jade Capital Partners is a member (Member # 31070), and can be reached on 1300 780 808 or GPO Box 3 Melbourne VIC 3001 (Australia).

13. COMPENSATION ARRANGEMENTS

We have professional indemnity insurance in place that complies with section 912B of the Corporations Act and ASIC Regulatory Guide 126. The policy will cover work done for us by our representatives and employees after they cease to work for us.

14. OUR RECORD KEEPING OBLIGATIONS

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

15. 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 your transactions will primarily be used for the processing of your application and for complying with certain laws and regulations. We have systems and processes in place which safeguard against the unauthorised use or disclosure of your personal information. Please contact us if you have any concerns or if you would like to see a copy of our privacy statement visit our website.

16. OUR CONTACT DETAILS

Jade Capital Partners Pty Ltd
ABN 88 153 326 222
AFSL 425895

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Email: info@jadecapital.com.au
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