Financial Services Guide

This Financial Services Guide (**FSG**) is an important document. It is designed to assist you in deciding whether to use any of the financial services offered by Syfe Australia Pty Ltd (ABN 82 655 611 779) (**Syfe, we** or **us**) as Corporate Authorised Representative (**CAR**) (CAR No. 001295306) of Sanlam Private Wealth Pty Ltd (ABN 18 136 960 775 AFSL No. 337 927) (**Sanlam Private Wealth**). As the provider of financial services to retail clients, we are required to provide you with this FSG.

This FSG provides you with important information about:

- who we are
- other documents that you may receive
- the types of services and products we can offer you, including the financial product advice you may receive
- how you can give us instructions
- how we (and other relevant persons) are remunerated for these services and products
- compensation arrangements
- significant relationships and associations we have
- our privacy policy and how we protect your personal information
- our complaints handling procedures and how you can use them
- records we keep
- how you can contact both us and Sanlam Private Wealth.

Sanlam Private Wealth has authorised the distribution of this FSG by Syfe.

Who we are

Syfe is the operator of a digital investment platform that provides investors the ability to buy and sell a range of financial products. Our mission is to transform the way people manage their money and make high quality financial services affordable and accessible to all.

This FSG relates to the services we may provide to you through our trading platform which are regulated as financial services by the *Corporations Act 2001* (Cth) (**Corporations Act**). Unless stated otherwise, this FSG does **NOT** apply to other services on our platform.

Other disclosure documents

The terms and conditions governing all services (including financial services) we may provide to you through our online platform are set out in the Client Agreement.

Our Terms of Use are available at https://www.syfe.com/au.

If we make a recommendation to acquire a particular financial product (other than securities such as listed shares) or offer to issue, or arrange the issue of, a financial product (other than securities such as listed shares) to you, we will provide you with a product disclosure statement (**PDS**) containing important information regarding the features, benefits, fees and risks associated with that financial product to assist you in making an informed decision about whether to invest in the financial product. You should consult with your licensed financial adviser if required.

If you obtain personal advice from a licensed financial adviser, they will provide you with a Statement of Advice (**SOA**).

What financial services and financial products we provide

We and any other financial service provider involved in our digital platform solution act on your behalf when providing financial services to you.

Sanlam Private Wealth has authorised us to provide the following financial services with respect to the following financial products to wholesale and retail clients:

1. Provide Financial Product Advice to retail and wholesale clients for the following classes of financial products:
    (a) Deposit and payment products limited to basic deposit products;

(b) Deposit and payment products limited to deposit products other than basic deposit products;

(c) Foreign exchange contracts;

(d) Government debentures, stocks and bonds;

(e) Interests in managed investment schemes including investor directed portfolio services; and

(f) Securities.

2. Deal in a financial product to retail and wholesale clients by 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 basic deposit products;

    (b) Deposit and payment products limited to deposit products other than basic deposit products;

    (c) Foreign exchange contracts;

    (d) Government debentures, stocks and bonds;

    (e) Interests in managed investment schemes including investor directed portfolio services; and

    (f) Securities.

Currently all financial product advice (e.g. where we publish articles on investment that falls outside of being merely factual information) that we provide is general advice. This means we do not take into account any of your individual objectives, financial situation or needs. Before investing in any financial product through our platform, you should consider whether the product is appropriate for you, and you may wish to consult a suitably licensed professional financial adviser. If you become a customer of ours, you may also receive financial services from other providers and, where relevant, they will separately provide you with their own Financial Services Guides (if applicable) and other related disclosure documents.

We are not a participant of any stock exchange and we do not trade directly on stock exchanges on your behalf. Therefore, when you use our trading services, this involves us arranging for other providers to enter into trades on the relevant exchanges on your behalf. We require you to familiarise with relevant Exchange Rules and the relevant provider's trading terms and conditions prior to engaging in any trading activity.

Our trading platform allows you to trade securities and exchange traded funds (**ETFs**) on one or more exchanges in the United States (**US**) and Australia.

In order for you to trade US securities and ETFs, we will arrange for you to trade through Alpaca Securities LLC (**Alpaca**), a member of Securities Investment Protection Corporation (**SIPC**) who will hold all US financial products acquired by you on your behalf as a custodian in accordance with the Alpaca Securities Customer Agreement.

In order for you to trade Australian securities and ETFs listed on the Australian Securities Exchange/Cboe Australia, we will arrange for you to trade through Openmarkets Australia Ltd (**Openmarkets**). In obtaining the services associated with such trading, we act as your agent with Openmarkets. Australian financial products acquired by you will be held for you by Openmarkets Nominees Pty Ltd (**OM Nominees**) in accordance with the Retail Custody Nominee Terms.

As part of the trading services, our platform allows you to place aggregated orders, where multiple trades for securities and/or ETFs in pre-determined allocations may be placed in a single order ("**Smart Baskets**"). In allowing for multiple trades in a single order, Smart Baskets allow you to achieve execution cost savings. Smart Baskets do not consider and are not tailored to your individual goals and circumstances, and are not to be regarded as personal advice, a managed discretionary account, or a managed investment scheme. You are advised to read and understand the descriptions and compositions of the various Smart Baskets so as to have a good understanding of the underlying investments and to ascertain if they are suitable for you. You may also wish to discuss the appropriateness of any particular Smart Basket for your personal financial circumstances with your own independent financial adviser.

While we take care to ensure that the composition of a Smart Basket is designed based on information relevant and available as assessed by us at the initial time of composition, such composition may not be amended or updated at every instance to be contemporaneous with prevailing market conditions. Accordingly, you should ensure that you understand and agree with the composition of a Smart Basket before placing the order.

How to instruct us

We will accept your dealing instructions via our trading platform. Any other form of communication which is not a dealing instruction may be made by telephone, by email, via website, client portal or in person.

Trade confirmations and account statements will be either sent to you by email or made available to you in the client portal section of our trading platform, followed by an email alert or notification sent to you.

Remuneration or other benefits we may receive

We are remunerated directly through the fees we charge you for the financial services we provide in accordance with the Client Agreement between you and Syfe. Our current fees are available on our website at https://www.syfe.com/au.

The fees and charges payable depend on the financial services that are provided to you.

Included within the fees we charge for your use of our platform are the market participants' and other providers' fees. For example, when we charge you fees to trade US and/or Australian securities and ETFs, the amount that we charge will account for the amount that is paid to Alpaca and/or Openmarkets and OM Nominees (as the case may be) for the services they provide to you.

Alpaca, Openmarkets, and OM Nominees are not separately remunerated by you for the custodial or depository services they provide to you, as described above.

We are not separately remunerated by third parties in respect of the construction and composition of the Smart Baskets.

We may retain interest from cash balances held in the omnibus cash custodian account(s) maintained with JP Morgan Chase Bank, N.A. This interest is paid at a rate determined by the bank from time to time.

Our representatives are remunerated by salary that includes superannuation benefits, bonuses and other benefits and incentives (both monetary and non-monetary) from Syfe and do not directly receive any commissions or fees. Bonus payments and other benefits are discretionary and are based on achievement of predetermined objectives and may include but are not limited to, business, customer, productivity and risks. Our representatives may also be eligible to Employee Share Option/Acquisition Plan or indirect benefits including overseas travel or corporate promotion merchandise or similar.

Various members of Sanlam Private Wealth and their directors and employees provide certain financial, information technology, human resource and other services to us to enable us to provide the services described in this FSG. You will not be charged for their remuneration. We pay for the costs of providing these services from the fees we receive.

The information in this section is subject to change and does not include information in relation to the fees, taxes or charges that you may be required to pay in relation to an investment that you make using our platform.

Third-party referrals

We may enter commercial arrangements with external parties or other financial service providers at our discretion, who may directly or indirectly introduce clients to us. We may share a portion of our fees relating to such referrals with the relevant referrer.

Compensation arrangements

We and Sanlam Private Wealth maintain professional indemnity insurance cover in respect of financial services provided to our clients. This insurance covers claims in relation to the conduct of our past and present representatives in respect of any loss or damage suffered by you due to a breach by us of our regulatory obligations. These arrangements comply with the requirements of section 912B of the Corporations Act) and regulation 7.6.02AAA of the *Corporations Regulations 2001* (Cth) .

Details of associations and relationships

As a member of the Syfe Group, we have working arrangements with other group entities including Syfe Pte. Ltd. (a company formed in Singapore) and or other related parties. These entities may provide services to Syfe and/or you to enable us to provide you the financial services.

Disclosure of relevant conflicts of interest

Neither we nor Sanlam Private Wealth have any relationships or associations which might influence us or them in providing you with any of our or their financial services.

Privacy

Your right to privacy is important to us. When we provide financial services to you, we may need to collect your personal information. Your personal information (including any sensitive information) will be handled in accordance with our Privacy Policy. This policy outlines how the information we collect from you will be used, stored and disclosed consistent with the *Privacy Act 1988* (Cth).

Our Privacy Policy is available at https://www.syfe.com/au.

Complaints handling

Sanlam Private Wealth and Syfe have established procedures for dealing with complaints which cover the financial services that we provide to retail clients.

If you have a complaint about the financial services we provide, you should first contact us. If you cannot resolve the complaint with us, then you should contact Sanlam Private Wealth. Our contact details and Sanlam Private Wealth's contact details can be found at the end of this FSG.

We will acknowledge your complaint within 1 business day of receipt. We will investigate complaints with the aim to provide a response (if not a resolution to the complaint) within 30 days.

If you are ultimately dissatisfied with the outcome of your complaint, you may refer the matter, free of charge, to the Australian Financial Complaints Authority (**AFCA**), which is an external dispute resolution scheme.

The contact details for AFCA are:

Phone: 1800 931 678

Fax: (03) 9613 6399
Email: info@afca.org.au
Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

Website: www.afca.org.au

Sanlam Private Wealth is a member of AFCA.

Please note that if you have a complaint about a financial product rather than about our services, then you should contact the relevant product issuer. The PDS for the relevant product will explain how you can do this.

Record keeping

We will seek to ensure that comprehensive and accurate records of all transactions and investments undertaken, and documentation executed, are properly maintained.

Contacting us

Syfe Australia Pty Ltd

Level 19, 180 Lonsdale Street

Melbourne VIC 3000Australia
Phone: 1800 577 398
Email: support.au@syfe.com
Website: https://www.syfe.com/au

Sanlam Private Wealth Pty Ltd (Authorising Licensee)

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Australia
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Fax: (02) 8245 0599
Email: SPW_compliance@privatewealth.sanlam.com.au
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