

## FINANCIAL SERVICES GUIDE

### What is a Financial Services Guide?

This Financial Services Guide (FSG) is issued to you as a retail client to assist you to understand and decide if you wish to use the financial services we may offer you. It gives you information about the entities that may provide you with financial services.

Share Sales Direct Pty Ltd ('SSD') ABN 86 671 728 313 is the providing entity for financial products and services offered by it as a corporate authorized representative No 001307186 of Macrovue Pty Limited ('Macrovue') ABN 98 600 022 679 Australian Financial Services License 484264. Macrovue is wholly owned by HALO Technologies Pty Ltd ('HALO') ABN 54 623 830 866. HALO and SSD are wholly owned by HALO Technologies Holdings Limited ('HALO Tech') ABN 73 645 531 219 and it's associated entities.

In this FSG, we collectively refer to SSD, Macrovue, and HALO and our representatives as 'SSD', 'we', 'us', 'our'.

This FSG sets out the services we provide and explains:

- who we are and how we can be contacted;
- who the licensee is and how it can be contacted;
- what services and products we are authorised to provide to you;
- how we (and any other relevant parties) are paid; and
- any relationships we have with any other organisations affiliated with us or with product issuers, which might influence us in providing financial services to you; and
- how we deal with complaints.

Please retain this FSG for your reference and any future dealings with us. We may also add supplementary documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'Supplementary FSG' in the heading.

### Purpose of this FSG

This FSG provides information to you about your client rights and obligations under the Corporations Act 2001 and Regulations (Corporations Act) and about our services, charges, and obligations to our retail clients. This FSG contains information on investment risk, interests of ours which may conflict with yours, and remuneration/benefits payable to SSD and others if you use our services. Charges, commissions, or fees not listed in the body of or in a schedule to this FSG are listed in a separate fees schedule which will be provided when you complete an account application and before you commence trading, and also on request.

This FSG also tells you what to do if you have a complaint and how we will handle it. It explains the protection of, and why we need and how we use, the Personal Information that you may provide to us, if our services are used.

It is our objective to provide you with clear, concise, and effective disclosure about our products and services which may assist you to determine whether to use any of our products and services. Should you choose to use any of our services and products, you may also receive other documents relevant to the services or products which you should also read carefully and ensure that you understand.

### Warning – General Advice only

Nothing contained in this FSG constitutes the giving of personal advice for a recommendation concerning an investment in a particular financial product. In preparing this FSG, SSD has not taken into account the investment objectives, financial situation or particular needs of any individual client. This FSG only contains factual information or general advice. Before making a decision whether to invest in a particular financial product you should speak to your financial service provider and obtain independent tax advice taking into account your own particular objectives and financial circumstances and needs.

### General Advice

SSD only provides information to you on a general advice basis which is a rating or assessment based solely on the attributes of the financial product, the portfolio or investment strategy alone without considering whether it is also appropriate for your investment objectives, financial situation, or particular needs.

General Advice includes research reports, analytical tools, webinars and newsletters and may also be provided verbally or in writing by your adviser. You must not assume that any research recommendations or ratings are appropriate for you personally. The process of profiling a client's relevant circumstances and financial objectives is not relevant in relation to General Advice. General Advice may be derived from fundamental analysis; ie. analysis of financial reports, or technical analysis (patterns in market trading and price-movement behaviour).

Additionally, SSD will not enter trades on your behalf without your instructions and consent, nor will it monitor or manage your portfolios in any way at any time. You must ensure that you manage your investments and strategies in relation to your portfolio.

### **Amendments to this FSG**

SSD may at its discretion and without any prior or subsequent notice to you, amend or remove any part of this FSG at any time to reflect changes in our practices and or applicable law and regulation.

The current FSG is available at [www.sharesalesdirect.com.au](http://www.sharesalesdirect.com.au).

If you need to refer to the FSG from time to time to ensure that you are aware of any changes or updates to the FSG, we recommend that you check the website or request a current version which will be indicated by a change in the version number and date noted in the footer of the document. If you do not have access to electronic communication or our website, you may request a copy of this FSG by contacting us.

## **Who will be providing the financial services to you?**

### **The Licensee**

The licensee discussed in this FSG is the authorising licensee for the financial services provided to you and is responsible for those services.

The licensee authorises, and is also responsible for, the content and distribution of this FSG.

The authorising licensee may also appoint and be responsible for the corporate authorised representative and its sub-authorised representatives (these are the advisers who may provide general advice on securities to you and/or arrange execution of your trades).

#### *Licensee details*

Licensee name: Macrovue Pty Ltd  
AFSL number: 484264  
Address: Level 4 10 Barrack Street, Sydney NSW 2000  
Phone: 1300 720 292  
Email: [hello@halo-technologies.com](mailto:hello@halo-technologies.com)

### **The Authorised Representative**

Share Sales Direct Pty Ltd is the providing entity and provides the financial services to you in its capacity as a corporate authorised representative of the licensee.

#### *Authorised Representative details*

Name: Share Sales Direct Pty Ltd  
Address: Level 4 10 Barrack Street, Sydney NSW 2000  
Website: [www.sharesalesdirect.com.au](http://www.sharesalesdirect.com.au)  
Phone: 1300 092 575  
Email: [support@sharesalesdirect.com.au](mailto:support@sharesalesdirect.com.au)

The licensee may also authorise individual authorised representatives who may share the same office as HALO Technologies.

The licensee and the authorised representatives discussed in this FSG act on your behalf when financial services are provided to you.

We act on your behalf when arranging the sale of securities on an applicable exchange and the ongoing holding of those securities.

To use our services, you need to agree to our Client Contract. The terms are available on our website. It is important that you read the Client Contract before instructing us to sell your securities.

Macrovue Pty Ltd has entered into a Consolidated Account Clearing Agreement with Interactive Brokers Australia Pty Ltd (IB) under which IB will provide execution, clearing, and custody services to customers of HALO and SSD. IB is registered with the Australian Securities and Investment Commission (ASIC) and is a participant of ASX, ASX 24, Cboe Australia and various international exchanges. IB does not endorse or recommend any introducing brokers, third-party financial advisers or hedge funds, including HALO and SSD. None of the information contained herein constitutes a recommendation, offer, or solicitation of an offer by IB to buy, sell or hold any security, financial product or instrument or to engage in any specific investment strategy. IB makes no representation and assumes no liability to the accuracy or completeness of the information provided in this FSG. For more information regarding IB, please visit [www.interactivebrokers.com](http://www.interactivebrokers.com).

SSD and HALO are not a broker or a participant of an exchange and will always engage a licensed third party executing broker to effect transactions. These executing brokers are clearing participants or they will engage a clearing participant to settle your trades. Under their terms of engagement, these executing brokers have placed limits on their liability, do not guarantee the availability of their services and have rights in relation to the securities that are purchased through them which they might be able to exercise contrary to your interests. Accordingly, we cannot guarantee that your trades will be executed either at all, within a particular timeframe or at a particular price.

SSD and related bodies corporate do not have any relationships with the issuers of financial products that might reasonably be expected to influence SSD in providing any of the authorised services listed below.

## How you may provide instructions to us

You may provide instructions to us:

- (1) by way of our website;
- (2) by way of a telephone conversation;
- (3) by post;
- (4) by email; or
- (5) in person.

The method by which SSD will accept your instructions is subject to the terms and conditions of trading with SSD (accessible from the SSD website).

We arrange for all security trades to be executed, cleared and held in custody by Interactive Brokers Australia Pty Ltd. What services and products are we authorised to provide to you?

We are authorised to offer the following financial services to retail and wholesale clients:

- Provide General Financial Product Advice; and
- Deal in Financial Products; and
- Provide Custodial and Depository Services.

Products on which we are authorised to provide general financial product advice and deal in are:

- Interests in Managed Investment Schemes (excluding investor directed portfolio services); and
- Securities.

In providing our services, other financial matters may arise. However, we are not authorised to assist with any financial products or services except those explained above. You should seek specific advice from the appropriate professionals (eg. tax accountant) on other matters relevant to you.

If you do not understand any of the information in this Financial Services Guide or have any other questions relating to the terms on which we will be acting, please contact us at the Licensee details above.

## What do you pay for our services?

The fees you may need to pay for our services include, but are not limited to:

- Brokerage fees on trades executed;
- Foreign exchange conversion fees;
- Other fees or benefits that are paid with your consent.

### Brokerage fees

When you sell securities through us, your order will be executed by Interactive Brokers Australia Pty Ltd. We will deduct our fees and charges and forward the remainder to you. Part of the amount that is deducted by us will be paid to IB. The total fee that will be paid by you is as follows:

1. If you use our “Gold (DIY - do it yourself)” Service you will pay 0.9% of the trade value plus GST with a minimum \$90 brokerage fee plus GST;
2. If you use our “Platinum (DFY - done for you)” Service, you will pay 1.4% of the trade value plus GST with a minimum \$140 brokerage fee plus GST

Where shares are held by a company, trust, self-managed superannuation fund, a deceased estate or you are a citizen of a country other than Australia, or you are an Australian citizen but live overseas an additional brokerage fee of \$100 (including GST) will apply to the Gold (DIY) or Platinum (DFY) service.

Brokerage fees are payable each time an Australian or international share is traded (bought or sold).

### **Foreign exchange conversion fees**

If the trade involves the sale of foreign shares, a foreign currency conversion will take place that may attract a conversion fee. We may waive these conversion fees for conversion of small amounts of foreign currency. A foreign currency conversion may also require multiple transactions in order to get filled.

The foreign exchange conversion rate shown to you after your trades have been executed includes a spread of 50 bps which is retained by SSD as remuneration.

Some foreign exchange conversions may require an additional transaction in a third currency if a direct currency pair is not available (e.g. if you buy a Swedish stock then your AUD balance will first be converted to USD before it can be converted to Swedish Krona). This may result in two foreign exchange conversion fees.

## **How are we and third parties remunerated?**

### **Referring Partners**

If you, the client, or transaction are referred to SSD by a referring partner, SSD may pay a percentage of between 0-50% of the fees received as a rebate to its referring partners.

These may be amended from time to time and you may request an update from

[support@sharesalesdirect.com.au](mailto:support@sharesalesdirect.com.au).

### **The Licensee and authorised representative**

Our directors and employees (including any employees of a related body corporate) may be remunerated by salary and other employee benefits. They may also be eligible for a discretionary bonus. Bonuses will depend on several factors including:

- company performance;
- professionalism and adherence to compliance procedures; and
- team performance.

Our shareholders (including any shareholders of a related body corporate) may also receive a benefit based on the Licensee's ongoing company performance.

You may request more details about the way these people or entities are remunerated within a reasonable time after receiving this document and before any financial services are provided to you.

## **What arrangements may influence our advice to you?**

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at or above \$300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to educational and training purposes. All alternative forms of remuneration require management approval.

## **What should you do if you have a complaint?**

We encourage you to contact us or your adviser to discuss your concerns as soon as possible. If you remain dissatisfied with the matter you have raised or would like to lodge your complaint directly with the Licensee, we ask that you contact us in writing, by email, over the phone or in person:

Complaints Officer

By email to [compliance@halo-technologies.com](mailto:compliance@halo-technologies.com)

OR

By mail to Level 4 10 Barrack Street Sydney NSW 2000

OR

By phone on 1300 092 575

The Complaints Officer will resolve your complaint or advise you of the steps that we shall take to review and address your complaint. The issues involved may be complex and subject to special regulations. We will do our best to resolve your complaint quickly and fairly.

In either case, you will receive an acknowledgment within 24 hours (or as soon as practicable) of your complaint being received.

We will provide you with our written reasons for the outcome of your complaint within 30 days where your complaint is not resolved within 5 business days of us receiving your complaint or if you request a written response.

We are a member of the Australian Financial Complaints Authority (AFCA), an ASIC authorised external dispute resolution scheme for the financial services industry. If your complaint isn't resolved to your satisfaction within 30 days, you may then refer the

matter to AFCA using the following contact details:

Mail: GPO Box 3, Melbourne Victoria 3001  
Phone: 1800 931 678 (toll free Australia-wide)  
Fax: +61 3 9613 6399  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Online: [www.afca.com.au](http://www.afca.com.au)

We also urge you to refer to our Client Complaints Policy available on our website [www.sharesalesdirect.com.au](http://www.sharesalesdirect.com.au) where we explain our complaint handling process in detail.

## Compensation arrangements

We maintain adequate professional indemnity insurance as required by s912B of the Corporations Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

## Privacy

We are committed to protecting the privacy, accuracy and security of the personal information provided to us about you by you or others who you have consented to provide such information. The information is protected in accordance with our Privacy Policy. Your personal information will be used for establishing and maintaining you as an account holder, to facilitate transaction execution and settlement, registration of your holdings of financial products, and to provide other related services to you through your adviser. If you choose not to provide the personal information requested, we may be unable to provide some or all of the services required. We are obliged to confirm and record your identity in accordance with legislation including the Corporations Act and AML/CTF Act. Consequently, you must notify us immediately of changes to personal information; eg. change of address.

Your Personal Information will only be disclosed internally within SSD, Macrovue, HALO and third party service providers in accordance with our Privacy Policy and as required by law. Please refer to our Privacy Policy statement which is available at [www.sharesalesdirect.com.au](http://www.sharesalesdirect.com.au) or can be sent directly to you via email or post on request.

## Recording telephone conversations

You acknowledge that we and our representatives may record telephone conversations between us. If a dispute arises between you and us or our representatives, you have the right to listen to any recording of those conversations, if recorded. Please contact [support@sharesalesdirect.com.au](mailto:support@sharesalesdirect.com.au) for more information.