



Benstead Holdaway

PRIVATE CAPITAL

FINANCIAL SERVICES GUIDE

AUSTRALIAN FINANCIAL SERVICES LICENCE NO. 469885



ABOUT THIS DOCUMENT

This Financial Services Guide (FSG) is provided by Benstead Holdaway Capital Pty Ltd ACN 602 386 541, AFS licence (AFSL) number 469885 (Benstead Holdaway). This FSG is designed to assist you in deciding whether to use the financial services that we provide. It describes who we are and how we can be contacted, the services and products that we are authorised to provide, how we are remunerated, our professional indemnity insurance and how we handle any complaints you may have.

WHICH FINANCIAL SERVICES ARE WE LICENSED TO PROVIDE?

Benstead Holdaway's Australian Financial Services Licence (AFSL 469885) authorises us to provide the following services to wholesale clients:

- a. Provide general financial product advice for interests in our own managed investment schemes.
- b. Deal in financial products by—
 - i. issuing, applying for, acquiring, varying or disposing of interests in our own managed investment schemes, and
 - ii. applying for, acquiring, varying or disposing of basic deposit products and general insurance products on behalf of another person.
- c. Operate custodial or depository services, other than investor directed portfolio services.

HOW YOU CAN DEAL WITH US

You can apply to become an investor in one of our managed investment schemes by obtaining a copy of the Information Memorandum (IM) for the fund and completing the application form accompanying the IM. Further details on investing are set out on our website and in the relevant IM. The IM will contain information about the features, costs, risks and benefits of the fund and of becoming an investor, along with other information to help you make an informed decision about becoming an investor. You should consider the IM carefully before making a decision to become an investor.



Unless otherwise stated in the relevant IM, we require that you provide all instructions to us in writing, signed by you. Where those instructions are of a purely administrative nature, we will act in accordance with those instructions. Otherwise, we will consider those instructions in accordance with our legal obligations.

If you visit our website or call us, you will receive factual information or general advice only. It is important to note that general advice does not take into account your particular financial situation, needs or objectives. Advice we provide is general in nature and is provided to enable you to assess your own circumstances against products you wish to invest in. You must obtain and read a copy of the relevant IM before making a decision to invest in any of our funds.

HOW WE ARE PAID

We are remunerated for our financial services by way of the fees applicable to a fund in which you invest. These fees are detailed in each IM and may include management fees, asset acquisition and disposal fees and performance fees payable to us or parties related to us.

Our employees and directors are remunerated by way of salary and bonuses linked to performance. Our employees do not receive commissions or volume based incentives for providing financial services to you.

We may receive other monetary and non-monetary benefits from third party service providers engaged to provide services to our funds, including capital introduction services, contributions to our marketing campaigns, fee rebates, invitations to events, travel expenses, research and data services, provision of software and/or computer hardware and other IT related services.

You may request particulars of any benefits payable to us for a particular fund or service, however, we will not account to investors for any amounts or benefits received and retained if in our opinion it is not reasonably possible to quantify any such monetary or non-monetary benefits in dollar terms.

Where permitted by law, we may pay a commission or other benefit to parties including external parties who refer customers to us. This could be made up of a single one-off payment or benefit or calculated as a percentage of the total amount of sales generated by their referrals. These commissions will be paid by us from our own funds or from our fees or from the fund, as disclosed in the relevant IM. There will be no additional cost to you for any commission paid by us.



OUR ASSOCIATIONS AND RELATIONSHIPS

We generally outsource the day-to-day investment management of our funds to Benstead Holdaway Management Pty Ltd ACN 643 761 513 (BHM), which is a related party. BHM is responsible for making investment decisions and implementing the investment strategy in relation to our funds. This arrangement is governed by an investment management agreement, which is negotiated at arm's length between us and BHM. We or BHM may also enter into other transactions or engage the services of related parties. All transactions are effected at market rates or at no charge.

We or BHM may engage the services of related entities Mica Property Management Pty Ltd ACN 646 154 476 for agency or property, facility and asset management services or Tomkins Commercial and Industrial Builders Pty Ltd ACN 061 732 778 for construction or project management services. All engagement to those and other related entities will be effected at market rates or at no charge.

The Corporations Act requires AFS licensees to have in place arrangements for managing conflicts of interest that arise in relation to activities undertaken in the provision of financial services. Benstead Holdaway has compliance procedures in place to ensure any potential conflicts of interests are identified, and either controlled, disclosed or avoided.

OUR COMPENSATION ARRANGEMENTS

We have professional indemnity insurance in place in respect of the financial services we provide. This insurance also covers potential liability arising from compensation claims. These arrangements satisfy the requirements for compensation arrangements under section 912B of the Act.

WHAT TO DO IF YOU HAVE A COMPLAINT

If you have a complaint about our services, please contact us at:

Complaints Officer
Level 1, 130 Mary Street,
Brisbane QLD 4000
info@bensteadholdaway.com.au



We will acknowledge your complaint as soon as possible and will attempt to resolve it within 45 days. If you are not satisfied with our final response, you can lodge a complaint with the following external dispute resolution scheme:

Australian Financial Complaints Authority (AFCA)
GPO Box 3
Melbourne VIC 3001
1800 931 678
info@afca.org.au
www.afca.org.au

Please note that the scope of matters AFCA can deal with has some financial limitations. AFCA will advise you if they can deal with your complaint, and if so, what information you need to supply. A complaint must first be submitted to Benstead Holdaway's complaints handling process to give us an opportunity to review it before it can be referred to AFCA.

Both our internal complaints handling procedure and the external dispute resolution service are free of charge. The Australian Securities and Investment Commission (ASIC) also has a free call Infoline 1300 300 630 which you may use to obtain information about your rights.

HOW YOU CAN CONTACT US

Our contact details are as follows:

Benstead Holdaway Capital Pty Ltd ACN 602 386 541 AFS licence no. 469885
Level 1, 130 Mary Street,
Brisbane QLD 4000
info@bensteadholdaway.com.au
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