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ADMIRAL MARKETS PTY LTD FINANCIAL SERVICES GUIDE

Valid as of 1st of July, 2019

Admiral Markets Pty Ltd
ABN 63 151 613 839
AFSL 410681
Level 10, 17 Castlereagh Street
Sydney NSW 2000
Phone number 1300 88 98 6

1. PURPOSE OF THE GIVEN FINANCIAL SERVICES GUIDE

The purpose of this FSG is to provide clients of Admiral Markets Pty Ltd (Admiral) with key information about the financial services that we offer and to comply with our obligations as holder of an Australian Financial Services License (AFSL) No 410681. Based on the given FSG and other documents available on Admiral's website, the clients can make an informed decision about whether to use those financial services. If you receive an electronic copy of this FSG, you should download or otherwise receive all of this FSG.

2. WHAT THIS FSG CONTAINS?

This FSG contains information about:

1. who we are and how we can be contacted;
2. the services and types of products we are authorized to provide;
3. details on how you instruct us in relation to those services and products;
4. how we (and any other relevant parties) are remunerated;
5. how complaints are dealt with.

3. WHO WE ARE AND HOW WE CAN BE CONTACTED?

Admiral is an Australian registered company providing services under Australian Financial Services License (No. 410681) and who is regulated by the Australian Securities and Investments Commission (ASIC).

We can be contacted at the following address:

Admiral Markets Pty Ltd
Level 10, 17 Castlereagh Street
Sydney NSW 2000

Toll Free: 1300 889 866
Email: info@admiralmarkets.com.au
Website: www.admiralmarkets.com.au

4. DOCUMENTS

Before opening a real trading account with Admiral, the clients should familiarize themselves with Admiral's Account Terms and other documents.

Product Disclosure Statement

In addition to this FSG, we have also added to our website Product Disclosure Statement (PDS). A PDS is a document that describes our products. A PDS contains important information to assist you in making a decision about the product. You will receive a PDS if a recommendation is made to acquire a particular financial product (other than securities) or an offer is made to issue or arrange the issue of a financial product. PDSs will be given for foreign ex- change, spot metals, derivatives and other financial products, as required by law.

Other Documents

Other documents such as Account terms, client suitability policy, client money policy, margin call policy and conflicts or interests policy are all available to the clients on Admiral's website www.admiralmarkets.com.au. Before opening a trading account, Admiral has the right to ask documentation to verify your identity and residential address. Additionally, and from time to time, you may be asked to submit and/or sign additional documents or forms for any ancillary service or arrangement (such as investment assets origin declaration, proof to verify bank account holder, direct debit agreement request forms or payment instructions forms).

5. WHAT FINANCIAL SERVICES ARE WE AUTHORISED TO PROVIDE?

Admiral is authorized by its AFSL to provide the following financial services to retail and wholesale clients:

(a) Provide general financial product advice for the following classes of financial products:

- (i) Deposit and payment products limited to:
 - (A) Basic deposit products;

(B) Deposit products other than basic deposit products;

- (ii) Derivatives; and
- (iii) Foreign exchange contracts;

(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) Derivatives; and
- (B) Foreign exchange contracts; 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;
 - (2) deposit products other than basic deposit products;
- (B) Derivatives; and
- (C) Foreign exchange contracts;

(c) Make a market for the following financial products:

- (i) Foreign exchange contracts; and
- (iii) Derivatives.

6. OUR RELATIONSHIP WITH YOU

Admiral is responsible for the financial services we provide to you. Admiral acts as principal in all transactions with you in respect of all the financial products offered by Admiral.

7. THE TYPES OF TRADING ACCOUNTS OFFERED BY ADMIRAL

Admiral.Markets Accounts

Admiral.Markets Accounts offer five (5) digit quoting and Straight-through Processing ('STP') on aggregated prices of banks and other venues such as Electronic Communication Networks ('ECNs') on the foreign exchange, spot metals, index derivatives, energy derivatives and bonds derivatives.

Admiral.Markets accounts also offer access to pricing on foreign equity derivatives from various trading venues, including, but not limited to, liquidity providers with specialisation on equity derivatives.

Since the foreign exchange market is predominantly unregulated, there is no central exchange for foreign exchange and trading is performed on an "Over the Counter" (OTC) market.

The trading account terms and conditions (for example the minimum deposit, leverage, the financial products offered) relating to the Admiral.Markets Accounts are available on www.admiralmarkets.com.au or you can download a demo account.

Admiral.Prime Trading Account

Admiral.Prime Accounts offer five (5) digit quoting and access to Admiral's proprietary Electronic Communication Network ('ECN') pricing on the foreign exchange and metals derivatives, with a single liquidity pool which consists of an aggregated order book of banks and other trading venues.

Since the foreign exchange market is predominantly unregulated, there is no central exchange for foreign exchange and trading is performed on an "Over The Counter" (OTC) market.

The Account Terms and trading conditions (for example the minimum deposit and leverage for the financial products offered) relating to the Admiral.Prime Accounts are available on: www.admiralmarkets.com.au or you can download a demo account."

8. HOW YOU CAN INSTRUCT US AND YOUR OBLIGATIONS

Admiral only accepts order instructions electronically, via Admiral MT4 online platform (MT4).

It is your obligation to review any confirmation or statement we send to you to ensure its accuracy and report any discrepancies that you may have to us immediately. If you wish to discuss the various types of Trading Accounts and obtain information about the type of products offered by Admiral, reporting or to update your personal information, please contact Admiral for further assistance.

9. TRANSACTION INFORMATION

Whenever a transaction is executed on your account, a confirmation or statement will be available for you to view on the Admiral MT4 online platform (MT4).

10. REPORTING

Admiral will provide you with access to electronic reporting detailing your positions and trades via MT4, including comprehensive information regarding transactions, the value of your positions and any fees and charges associated with your account.

11. WHAT IS THE NATURE OF THE ADVICE?

Any advice given by Admiral is general advice only unless it is identified as personal advice to you. The advice provided to you as a retail client does not take into account your objectives, financial situation or needs.

Under the law regulating provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether generally or for a class or kind of investor, without taking into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions). Such general advice is provided without any expressed or implied recommendation that it is appropriate for you in light of your personal circumstances. The onus is on you, as the client, to assess whether the information or general advice provided is appropriate for your personal needs, objectives and circumstances. Regular updates, marketing materials, research reports, market reports, case scenarios, investment strategy reports, PDSs or other offer documents and website content are not personal advice.

12. RECORD KEEPING

Admiral seeks to ensure that comprehensive and accurate records of transactions and client profiles, together with all advice or recommendations provided are properly maintained.

13. HOW WE ARE REMUNERATED

You may pay Admiral a fee depending on the type and level of services provided to you, the frequency and volume of transactions executed, the financial products you choose and the amount you invest. In particular, Admiral may receive fees and other benefits from the financial products that it issues to you. Unless otherwise stated, all fees, charges, commissions and benefits disclosed in this FSG are inclusive of goods and services tax (**GST**).

OTC Transaction Fees

For OTC transactions, such as foreign exchange products, spot precious metals, energy derivatives, equity derivatives, index derivatives and bonds derivatives the following applies:

Admiral acts as principal to the transaction unless otherwise indicated in a transaction or service to you. If Admiral acts as principal, Admiral are the party with whom you are transacting.

In this instance, Admiral does not charge a commission or a brokerage fee. Admiral charges a transaction fee calculated on the transaction's full face value subject to minimum amounts. The fees and charges for OTC transactions are disclosed in the PDS for those products.

Other financial product providers and fees and commissions

Admiral may have arrangements with financial intermediaries whereby the intermediary introduces clients to Admiral. In those circumstances, a payment may be paid by Admiral or a related entity to the financial intermediary. This payment is usually based on the value (or tiers of values) of the transaction or financial product that has been provided to you and can affect the transaction fee or margins payable by you on any transaction or financial product. The payment may be paid in the form of an upfront selling fee or periodic trail fees or both.

General

If you owe an amount to Admiral and you have not paid that amount, Admiral may charge interest on that outstanding amount at the rate set out or described in any agreements with you or, if not specified or described, at the rate equal to Admiral prevailing debit interest rate determined by it from time to time.

Additional fees may be charged for transactions and services, including but not limited to international transfers, bank cheques and additional account administration fees (eg inactivity fee), please refer to PDS for details.

Admiral may charge a fee for printing and postage of confirmations if you have the ability to receive electronic confirmations but have chosen not to do so. We may also charge reasonable amounts for additional reports or communications required by you. These fees will be advised to you prior to you requesting this information.

DISCLOSURE OF RELEVANT CONFLICTS OF INTEREST

Neither Admiral nor its representatives have any relationships or associations which might reasonably be expected to be capable of influencing the way we provide our services to you. Admiral has documented processes for controlling, avoiding and disclosing relevant conflicts of interests.

14. OUR EMPLOYEES AND REPRESENTATIVES

Admiral employees and representatives are remunerated through a base salary and from time to time, discretionary bonuses for their work for Admiral and related entities.

Our employees and other representatives may also benefit from various internal incentive schemes including seminars, conferences and training programs and non-cash rewards. Participation in these schemes is generally based on revenue production, length of service and compliance with group policies and industry regulations.

Professional Indemnity Insurance

Admiral has the benefit of professional indemnity insurance that complies with section 912B of the Corporations Act 2001 (Policy). Subject to its terms, the Policy covers certain clients for loss or damage suffered as a result of breaches of the relevant obligations of Admiral and its employees in relation to its AFSL.

Also, subject to its terms, the Policy covers certain breaches by Admiral's employees and representatives employed by Admiral at the relevant time.

15. HOW IS MY PERSONAL INFORMATION DEALT WITH?

Your privacy is important to us and we are committed to compliance with the Privacy Act 1998 (Commonwealth) and the National Privacy Principles. We maintain a record of your personal profile which includes your personal details and details of your investments. We also maintain records of any recommendations made to you.

We may disclose your personal information to external parties, such as our financial service providers, for the purposes of arranging/facilitating your investments or transactions. Such external parties are committed to protecting your privacy. We may also collect, hold and use your personal information to undertake appropriate administration, including in relation to the "Know Your Client" obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Commonwealth) **(AML/CTF Act)**.

If you wish to access information we hold about you, please contact us and we will make arrangements for you to do so. A copy of our Privacy Policy is available on our website, under Legal Documents section. Please contact us if you have any concerns.

16. ANTI-MONEY LAUNDERING

Admiral has adopted a program that complies with the AML/CTF Act. As part of this process, you may be required to provide documents to verify your identity, residential address and/or to verify you as a bank account holder when making deposits to your trading account or when withdrawing funds from the trading account. Such verifications are important in order to avoid any third party involvement with client's transactions.

17. DISPUTE RESOLUTION

Admiral has an internal and external dispute resolution procedure to resolve complaints from clients who receive financial services. A copy of these procedures may be obtained through our website or by contacting us and requesting a copy (free of charge).

We want to know about any problems you may have with the service of Admiral so we can take steps to resolve the issue. If you have a complaint about the financial product or service provided to you, please take the following steps:

1. **Contact Admiral:**

And tell the compliance representative of your complaint. You may do this by telephone, facsimile, email or letter. The contact details are:

Compliance Division
Admiral Markets Pty Limited Level 10, 17 Castlereagh Street Sydney NSW 2000
Telephone: 1300 889 866
Email: info@admiralmarkets.com.au

If you make a complaint in writing (which is not compulsory), we will acknowledge receipt of your complaint within 1 business day.

2. **Contact Managing Director**

If your complaint is not satisfactorily resolved by the compliance representative, within 5 business days of receipt of your complaint, please contact the Managing Director by telephone, email or letter. The contact details are:

Managing Director
Admiral Markets Pty Limited Level 10, 17 Castlereagh Sydney NSW 2000
Telephone: 1300 889 866
Email: info@admiralmarkets.com.au

We will try to resolve your complaint quickly and fairly. We will use our best endeavors to try to resolve your complaint within 45 days of receipt of your written complaint unless we advise you that we require more time due to the nature of your complaint or other reasonable consideration.

3. **External Dispute Resolution**

If you still do not get a satisfactory outcome, you have the right to complain to the Australian Financial Complaints Authority (AFCA). AFCA is a new external dispute resolution (EDR) scheme to deal with complaints from consumers in the financial system

Using AFCA is free to consumers. If you would like to access the scheme, please lodge a complaint:

Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678
Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

Please note that The Australian Securities and Investments Commission (ASIC) also has an Information line on 1300 300 630 which you may use to make a complaint and obtain information about your rights.