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# Financial Services Guide

[rmcapital.com.au](http://rmcapital.com.au)



Before seeking our advice, you may have several questions you would like to ask about RM Capital Pty Ltd and our advisers. We have a number of Corporate and individual authorised representatives and it is important that you read this document in conjunction with the individual adviser's profile to ensure you have a complete understanding of our business arrangements.

By law you have the right to ask us about our charges, the type of advice we will give you and what you can do if you have a complaint about our services. Key information is set out with answers to various questions below. If you need more information or clarification, please ask us. RM Capital Pty Ltd is required to abide by the FASEA Code of Ethics at all times when dealing with retail clients. A copy of the FASEA Code of Ethics is available on our website or you can ask your adviser for a copy.

This Financial Services Guide is issued with the authority of RM Capital Pty Ltd.

You should also be aware that you are entitled to receive a Statement of Advice (SOA) whenever we provide you with any advice which takes into account your objectives, financial situation and needs. The SOA will contain the advice, the basis on which it is given and information about fees and associations which may have influenced the provision of the advice. The SOA will also detail any remuneration that RM Capital Pty Ltd may be entitled to receive in relation to the advice provided to you and if you act on the advice, provide details of any interests, relationships or associations that may be capable of influencing the advice we give you. Under the FASEA Code of Ethics we will seek your written prior approval on receipt of any such remuneration.

By law, if RM Capital Pty Ltd and/or your adviser holds a financial interest in a financial product or any interest or ownership in a financial product or recommendation to you, it must be declared and recorded in a register and where appropriate, this holding will be disclosed to you in the SOA or Record of Advice (ROA). Where such holding is material or will create a potential conflict of interest please note that under the FASEA Code of Ethics your adviser will be required to decline providing services to you.

In the event we make a recommendation to acquire a particular financial product (other than securities) or offer to issue or arrange the issue of a financial product, we must also provide you with a Product Disclosure Statement containing information about the particular product which will enable you to make an informed decision in relation to the acquisition of that product.

## Before you receive our advice

### Who are the advisers?

Please refer to the individual authorised representative profiles for more details on your adviser.

### Who will be providing the advisory services to me?

All our advisers are Authorised Representatives of RM Capital Pty Ltd AFSL No. 221938 and the licensee being RM Capital Pty Ltd is responsible for the advice provided by its representatives. All Authorised Representatives receive remuneration in the form of brokerage, bonus payments or alternative remuneration and details of all fee arrangements will be included in the individual adviser profiles.

#### Lack of Independence

RM Capital Pty Ltd is not independent, impartial or unbiased because we receive commissions for the advice we provide on life risk insurance products.

### What advisory services are available to me?

RM Capital Pty Ltd is authorised under the licence to advise and deal in the following financial products:

- Deposit and payment products limited to:
  - Basic deposit products;
  - Deposit products other than basic deposit products;
- Derivatives
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Life products including;
  - Investment life insurance products
  - Life risk insurance products
- Interests in managed investment schemes including;
  - Investor directed portfolio services;
- Retirement savings accounts
- Securities
- Standard margin lending facility
- All superannuation

Each adviser is authorised by RM Capital Pty Ltd and you should refer to their individual adviser profile to see their authorisation details which may not be as broad as those of RM Capital Pty Ltd. When providing you with these advisory services, we act on your behalf. Product recommendations are only made after considering their suitability for your individual investment objectives, financial situation and needs. Under the Future of Financial Advice Reforms, the advice provider is obligated to act in your best interest and this requires the advice provider to collect all required information about your financial situation and needs and objectives, make enquiries into the information provided and investigate appropriate products and strategies that will meet your needs and objectives.

To ensure the most suitable advice we need to find out your individual investment objectives, financial situation and needs before we provide our advice. In addition, under the requirements of the FASEA Code of Ethics we may also seek information about broader needs and

objectives which may include information about family members and / or other relevant individuals where this information is essential to us providing advice in your best interest. Where the Authorised Representative cannot recommend any appropriate products or advises your best interest will not be served by him/her, they have a right to refuse provision of advice or services.

You have the right not to divulge this information to us, if you do not wish to do so. However please note under the FASEA Code of Ethics as a service provider we may deny providing services to you should you fail to provide this relevant information.

We will explain to you any significant risks of investments and strategies that we recommend to you. As part of this process we may seek to ensure you clearly understand the advice and implications of the decision process.

We maintain a record of recommendations made to you and your personal profile that includes details of your investment objectives, financial situation and needs along with working papers and file notes. You may examine your file at any time.

## What service models are available to me?

Due to the diverse nature of clients, RM Capital Pty Ltd and its advisers can offer clients three models of services.

### General Advice Services

Under this service model, clients will receive general information about financial products and general recommendations on top stock picks as well as capital raising projects. The client will need to make their own assessment as to suitability of the investment and whether they want to proceed and the amount they wish to invest. The adviser will not take the clients personal circumstances and financial needs into account when providing general advice. In this situation the client will not be entitled to receive a SOA or ROA however information in relation to fees and any conflict or disclosures will be provided where applicable. This model will generally suit clients who have some financial experience and / or are active traders who are only looking for some technical analysis on investment options and are happy to make their own decisions.

### Wholesale Client or Sophisticated Investor Services

Under this service model the adviser will deal with clients who are defined as wholesale clients or sophisticated investors in Chapter 7 of the Corporations Act. The Act provides for instances where a client can be defined as a wholesale client. These instances consider the experience of the investor, sum invested, net assets and income of an investor etc. Under this service model, the clients will generally have a level of market understanding and/or asset and income levels and the adviser will generally provide information on investments and excluded offers

and the client will make their own investment decisions. While the licensee and adviser are not required to provide a financial services guide, as best practice, this document is provided to wholesale clients as a courtesy to inform them of the scope of authorisations and charging arrangements. Provision of the FSG to a wholesale client does not constitute the provision of retail advice nor deem you to be a retail client.

### Personal Advice Services

Under this service model your adviser will review a client's individual circumstances, financial needs and objectives and based on these, advice will be provided. Where applicable ongoing advice will be provided and regular reviews will be offered and undertaken. A SOA will be provided outlining the recommendations and ongoing advice may be provided via a ROA. This service is suitable for those clients who want advice specific to them and are willing to provide an appropriate amount of personal information for your adviser to make informed recommendations.

## How will I pay for the service?

RM Capital Pty Ltd offers a range of payment options including fees and brokerage on funds placed, or a combination of both methods. Your adviser will explain these options to you.

## How are fees calculated and deducted?

Our calculation of fees is dependent on the level of service chosen by you. All levels of service, their associated calculations for fees and charges and the ongoing services provided are discussed in the first meeting and subsequently disclosed, prior to implementation of any recommendations, in the advice documents for retail clients.

*For a list of fees and charges, please refer to the individual authorised representative profiles.*

You have a right to request further information in relation to the remuneration received by RM Capital Pty Ltd and its Authorised Representatives.

RM Capital Pty Ltd may from time to time receive a benefit from preferred product providers by way of sponsorship of educational seminars, conferences or training days. Benefits above \$300 are prohibited. A register will be maintained in relation to benefits received and may be inspected at a mutually convenient time.

RM Capital Pty Ltd is not owned by any fund managers and there are no relationships that will influence the advice that you receive from us. However, RM Capital Pty Ltd is a related entity to RM Corporate Finance Pty Ltd and has common directors and officers. RM Capital Pty Ltd and/or its directors and officers may ultimately benefit

from services provided by RM Corporate Finance Pty Ltd via profit sharing or bonus payment arrangements.

RM Capital Pty Ltd has an agreement with FinClear Executions Ltd (FinEx), FinClear Services Ltd (FinSer), CMC Markets Stockbroking Ltd (CMC), and Australian Investment Exchange Limited (Ausix) to provide execution, clearing, settlement and sponsorship services. In order for RM Capital Pty Ltd to transact for you on the ASX or any other market you must open an account with FinEx, FinSer, CMC, or Ausix. All costs, fees, brokerage paid to FinEx, FinSer, CMC, or Ausix that are charged to your account are detailed in the respective FSG for FinEx, FinSer, CMC's & Ausix FSG which is available on request.

Your adviser may hold an interest in a financial product. Any significant interest/ownership will be recorded in a register and where appropriate, this holding will be disclosed to you in the SOA or ROA.

### What about your privacy?

RM Capital Pty Ltd is committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information. A copy of our privacy policy is available on our website [www.rmcapital.com.au](http://www.rmcapital.com.au) and a copy can be mailed on request at any time.

### When you receive our advice

Do I receive detailed information about actual fees and other benefits my adviser receives from making the recommendations?

Yes. You have the right to know the details of fees and other benefits your adviser receives for recommending investments. All fees and other benefits received by your adviser as a result of providing advice are clearly detailed in writing. A SOA will also be given to you in writing at the time the advice is given.

**Will you give me advice that is suitable to my investment needs and financial circumstances?**

Yes. However, to do so we need to find out your individual investment objectives, financial situation and needs before we recommend any investment to you. You have the right not to divulge this information to us if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

What should I know about any risks of the investments or investment strategies recommended to me?

We will explain to you any significant risks of investments and strategies that we recommend to you. If we do not do so, you should ask us for further clarification.

**What information do you maintain in my file and can I examine my file?**

We maintain a record of your personal profile that includes details of your investment objectives, financial situation and needs. We also maintain records of any recommendations made to you. If you wish to examine your file, we will make arrangements for you to do so.

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's licence. We will also retain copies of this information. We assure you that this information will be held securely.

**Can I tell you how I wish to instruct you to buy or sell my investment?**

Yes. You may specify how you would like to give us instructions. For example, by telephone or other means, however, in all cases you are responsible for ensuring your instructions have been received. RM Capital Pty Ltd cannot be held responsible for disruption of communication or technological services.

### Compensation Arrangements / Professional Indemnity

RM Capital Pty Ltd confirms that it has arrangements in place to ensure it continues to maintain Professional Indemnity Insurance in accordance with s.912B of the Corporations Act 2001 (as amended). In particular our Professional Indemnity insurance, subject to its terms and conditions, provide indemnity up to the Sum insured for RM Capital Pty Ltd and our authorised representatives / representatives / employees in respect of our authorisations and obligations under our Australian Financial Services Licence. This insurance will continue to provide such coverage for any authorised representatives / representatives / employee who has ceased work with RM Capital Pty Ltd for work done whilst engaged with us.

### If you have any complaints

**Who can I speak to if I have an enquiry or complaint about the advisory service?**

We are committed to providing quality advice to our clients. This commitment extends to assisting you with your enquiry and providing accessible complaint resolution mechanisms for our clients. If you have an enquiry or any complaint about the service provided to you, you should take the following steps:

Contact your adviser or the Compliance Officer at RM Capital Pty Ltd on +61 8 6380 9200 or [compliance@rmcapital.com.au](mailto:compliance@rmcapital.com.au) and tell us about your enquiry or complaint. If it's a complaint, we are required

at law to try and resolve the issue quickly and fairly within 30 days from the receipt of the complaint. If your complaint is not satisfactorily resolved within 30 days please note you can raise your concerns with the Australian Financial Complaints Authority on 1300 565 562. RM Capital Pty Ltd is a member of this complaints resolution service.

### Privacy Policy and Website

RM Capital Pty Ltd complies with the Australian Privacy Principles which also applies to your access to our website. Our privacy policy may be accessed from the website and other information is also posted there for your convenience.

Some areas of our website require you to be a client of RM Capital Pty Ltd and you will be issued with a username and password which are strictly for your personal use only. RM Capital Pty Ltd will not be liable for any acts that arise from the use of your username and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify RM Capital Pty Ltd immediately if you become aware of a breach of your security.

Our website uses cookies which allows us to identify your browser while you are using our site. Whilst cookies do not identify you, they allow us to track usage patterns. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

### Collection of your personal information

There are many aspects of the site which can be viewed without providing personal information, however, for access to future RM Capital Pty Ltd customer support features you are required to submit personally identifiable information. This may include but not limited to a unique username and password or provide sensitive information in the recovery of your lost password.

If you have objections to the Privacy Policy, you should not access or use the site.

### What if some of the information RM Capital Pty Ltd holds is wrong?

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on file.

### How do I make further enquiries or complain about a breach of privacy?

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Privacy Officer. We will respond to your complaint within 7 days. We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

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### Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time but will advise you of any material changes.