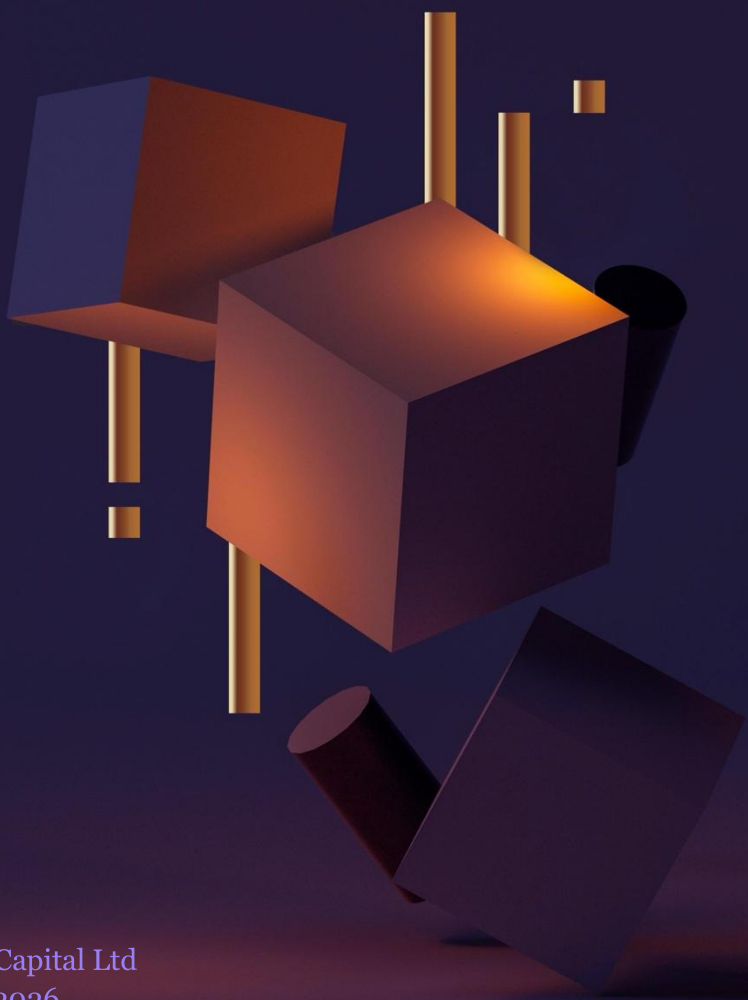
SPECIALISED PRIVATE CAPITAL

Financial Services Guide

The purpose of this Financial Services Guide (FSG) is to help you understand the financial services Specialised Private Capital Limited provides in respect of its managed investment schemes.



Issuer

Specialised Private Capital Ltd

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ABN 87 095 773 390

AFSL 246 744

SPECIALISED PRIVATE CAPITAL

Lack of Independence Disclosure

Specialised Private Capital Limited (Specialised Private Capital) holds an Australian Financial Services Licence (AFSL) where it is licensed to provide financial services such as 'personal' and 'general' advice. In relation to the provision of personal advice, Specialised Private Capital must include a statement in this Financial Services Guide (FSG) that sets out that it is not independent, impartial or unbiased. However, we have excluded this type of statement as Specialised Private Capital does not currently provide any personal advice in respect of its products. In the future, should Specialised Private Capital expand its services to include personal advice, this FSG will be updated to explain the reasons for any lack of independence.

After reading this FSG, you will know:

To invest in a Specialised Private Capital managed fund you will need to read the Product Disclosure Statement (PDS) and complete the application form located at www.specialisedprivatecapital.com.au. Please retain this document for your reference and any future dealings with Specialised Private Capital.

1. About Specialised Private Capital

Specialised Private Capital (ABN 87 095 773 390, AFSL 246744) is part of Findex Group Limited (ABN 40 128 588 714) (**Findex**).

Findex is one of Australia's largest privately-owned providers of wealth, accounting, lending and risk protection advisory services. Findex has developed a proprietary system for identifying the individual needs of its clients and providing advice and services to meet those specific needs. From time to time, Findex will share client information between its divisions for the sole purpose of delivering an improved level of service and comprehensive financial solutions to its clients.

If you have any further questions about Specialised Private Capital or the financial services we provide, please contact us:

Managed Investment Schemes

(02) 9250 6500

funds@specialisedprivatecapital.com.au

PO Box R1851, Royal Exchange NSW 1225

Specialised Private Capital acts on its own behalf as the holder of an Australian Financial Services Licence (AFSL) when providing financial services to you.

2. What financial services and financial products we offer

We are the responsible entity for a range of managed investment schemes. We hold an Australian Financial Services Licence (AFSL) that authorises us to operate these schemes and provide financial services to retail and wholesale clients. The AFSL also includes authorisation for Corporate Collective Investment Vehicle (CCIV). If you visit our website or contact Specialised Private Capital, 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. We recommend that you obtain and read a copy of the Product Disclosure Statement (PDS) before making a decision to invest in any product.

We are authorised under our AFSL to carry on a financial services business to:

1) provide financial product advice for the following classes of financial products:
   - derivatives
   - foreign exchange contracts
   - interests in managed investment schemes, and
   - from 1 July 2022, securities in a CCIV.
2) deal in a financial product by:
   a) issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products:
      - interests in managed investment schemes
   b) applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
      - interests in managed investment schemes,
3) operate the following kinds of registered managed investment schemes (including the holding of any incidental property) in its capacity as responsible entity:
   - Fixed Income Strategy 2 – a scheme which only holds derivatives and financial assets
   - Multi Strategy Alternative Fund – a scheme which only holds derivatives and financial assets, and
   - schemes which only hold financial assets.

3. How we are paid for the services we provide

If you invest through managed investment schemes, we receive remuneration in relation to your investment. Detailed information on fees and charges payable, including how fees are paid and if they can be negotiated, are set out in the PDS.

The actual amount of remuneration we receive will vary depending on a number of factors including your:

- number of accounts and account structure
- investment value/account balance, and/or
- transactions.

Specialised Private Capital may receive remuneration, including from product issuers and third-party service providers, for administrative and other services in relation to your investment.
Companies related to us may also receive:

- payment for administration, management, information technology, taxation advice and other services provided to us.
- brokerage and custodial fees associated with the operation of our managed investment schemes (where applicable).

You can request particulars of the remuneration (including commission) or other benefits that we receive, and we will provide that information to you.

However, that request must be made within a reasonable time after we have given a copy of this FSG to you and before we provide any financial services to you.

4. If you invest through your Nominated Financial Adviser

Your financial adviser may charge you fees for advice or services. These fees are agreed between you and your adviser and are disclosed in your Statement of Advice.

Unless disclosed in the relevant PDS, Specialised Private Capital does not pay commissions to financial advisers for investments in our managed investment schemes.

5. How you can give instructions to us

Instructions and requests about investing in a Specialised Private Capital managed investment scheme (including applications, additional investments, withdrawals and changes to your details) must be made in the manner set out in the relevant Product Disclosure Statement (PDS) and the applicable forms.

If you invest directly in a fund, you generally need to:

- complete the application form that accompanies the relevant PDS
- provide the required certified identification and any other documents specified in the application form, and
- arrange payment of your application amount by cheque (if offered) or electronic transfer, as set out in the application form, and send the completed documents to the fund's registry or other address specified in the PDS/application form

Joint applications must be signed by all applicants, unless the relevant PDS/application form states otherwise.

If you are applying under a power of attorney, your application must be accompanied by a certified copy or the original power of attorney and any required specimen signatures, as described in the application form.

We reserve the right to accept or reject, in whole or in part, any application for Units. To the extent that we do not accept an application, we will refund the Application Amount (less taxes and bank charges (if any)), without interest, within one month of us receiving your application money.

Indirect Investors should seek advice from their Platform Operator or consult the offer document or guide relevant to their Platform or similar type document as to whether cooling-off rights apply.

6. Our relationship or associations that could influence the financial services we offer

We can appoint external service providers (such as administrators, brokers and sub-custodians) to provide services in relation to our products. Such services are contracted on arm's length terms. Please refer to the relevant PDS for additional details on the external service providers.

We maintain a public register outlining the forms of any alternative remuneration that we both pay and receive. A copy of this register can be accessed upon request.
Any of the payments described above will be made to the extent permitted by law.

7. How we look after your privacy

We are bound to comply with the Australian Privacy Principles when we handle your personal information.

We, along with our appointed administrator and unit registry may collect your personal information directly from you, or your authorised representative (including your financial adviser).

The main reason we collect, use, hold and disclose your personal information is to provide requested services via Specialised Private Capital to you.

We may also do these things to:

- provide you with information, products or services that you might reasonably expect or request
- understand your needs, and to suggest products and services which we think you may be interested in
- manage rights and obligations under any laws applying to the services provided, or
- conduct research, or planning and marketing, which includes direct marketing (although you do have the right to specifically instruct that your details aren't used for these purposes).

The type of information which will usually be requested will include details about your financial, taxation, health, employment and estate planning matters. This may include details relating to your partner or family members.

You are not required to provide your personal information to us. However, if you do not provide your information then we may not be able to provide the services you request.

As a financial service provider, we have an obligation under the **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)** to verify your identity and the source of any funds. We will undertake all reasonable steps to verify your identity, which may include the use of third-party providers solely for identification verification purposes. As part of this process, we may ask you to present identification documents such as a passport or driver's licence and may retain copies of this information.

In providing services to you, from time-to-time we will disclose information about you to other professionals, including product issuers, as well as our service providers (such as the administrator and sub-custodian that we have

appointed to provide services in respect of our managed investment schemes).
We may disclose your personal information to overseas recipients (including in New Zealand).

More information about:

- how we collect, use, store and disclose your personal information;
- how you can access and seek correction of your personal information; and
- how you can make a complaint about a breach of your privacy including the Australian Privacy Principles, and how we will deal with your complaint is set out in our Privacy Policy which can be accessed on our website.

8. What to do if you have a complaint

Resolving complaints is a priority for us. As a first step, please contact us if you have any concerns or complaints about the products and services we provide. Our contact details are:

Managed Investment Schemes

(02) 9250 6500

funds@specialisedprivatecapital.com.au

www.specialisedprivatecapital.com.au

PO Box R1851, Royal Exchange NSW 1225

We will let you know that we have received your complaint and will work with you to try to resolve your complaint quickly and fairly in accordance with our internal dispute resolution process. We will respond within 30 days of receipt for standard complaints. If an issue has not been resolved to your satisfaction, you may lodge a complaint with the Australian Financial Complaints Authority (AFCA).

There are many variables that can affect complaint response times. This includes the complexity of the issues raised and the availability of information, including from third parties. Any delays in managing your complaint will be communicated to you within the response timeframe.

You may also lodge a complaint directly with AFCA, though they may not deal with a complaint and will likely refer the matter back to us if you have not previously raised the matter with us. **AFCA**'s contact details are:

1800 931 678

info@afca.org.au

www.afca.org.au

Australian Financial Complaints Authority Limited
GPO Box 3, Melbourne VIC 3001.

AFCA provides fair and independent financial services complaint resolution that is free to consumers. Time limits may apply to complain to AFCA so you should act promptly, or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

9. About our professional indemnity insurance cover

We maintain professional indemnity insurance that satisfies the requirements for compensation arrangements under section 912B of the **Corporations Act 2001 (Cth)**. The insurance provides indemnity up to the sum insured for Specialised Private Capital's obligations under its AFSL (subject to terms and conditions). This insurance covers former employees for work done whilst they were engaged with us. You do not have a direct right to claim under this insurance.