

Financial Services Guide

15 May 2019
FSG version 2.4

This Financial Services Guide (FSG) is provided by:

- Walsh & Company Asset Management Pty Limited (ABN 89 159 902 708, AFSL 450257) **(Walsh AM)**; and
- Walsh & Company Investments Limited (ABN 78 152 367 649, AFSL 410433) **(Walsh Investments)**.

References to 'we', 'us' and 'our' refer to each of the above entities.

This FSG is an important document regarding who we are, the services and products we are authorised to provide, how we and other relevant parties are remunerated, any potential conflicts of interest we may have and our internal and external dispute resolution procedures and how you can access them.

Before acquiring a financial product through us we will give you information about that product to help you make an informed decision about it, which may include a disclosure document prepared by the product issuer such as a Product Disclosure Statement (**PDS**), Prospectus or other offer document. These disclosure documents will contain information that will assist you in making an informed decision about the product. This usually includes information about the costs and charges that may apply.

We will not provide personal financial product advice to retail clients. Accordingly, you should not expect a Statement of Advice (**SOA**) from us. Before you make any investment decision, we recommend that you obtain investment advice tailored to address your individual objectives, financial situation and needs from a licensed financial adviser.

We will only provide general advice to retail clients. General advice does not take into account your objectives, financial situation or needs. A person that provides general advice must warn the client that the advice does not take into account your objectives, financial situation or needs. Where we provide general advice we will also generally provide you with a general advice warning. The general advice warning will be given in the same manner as the advice is provided (for example in writing or verbally).

What financial services and products are we authorised to provide?

We are authorised to:	Walsh & Company Asset Management Pty Limited	Walsh & Company Investments Limited
Operate certain kinds of registered managed investment schemes		Yes
Provide custodial or depository services (other than IDPS) to retail and wholesale clients	Yes	Yes
Provide general financial product advice to retail and wholesale clients about:		
Basic deposit products	Yes	Yes
Deposit products other than basic deposit products	Yes	Yes
Derivatives	Yes	Yes
Foreign exchange contracts	Yes	Yes
General insurance products		Yes
Debentures, stocks or bonds issued or proposed to be issued by a government	Yes	Yes
Interests in managed investment schemes (excluding IDPS)	Yes	Yes
Securities	Yes	Yes
Provide financial product advice to wholesale clients about:		
Basic deposit products	Yes	
Deposit products other than basic deposit products	Yes	
Derivatives	Yes	
Foreign exchange contracts	Yes	
General insurance products	Yes	
Debentures, stocks or bonds issued or proposed to be issued by a government	Yes	
Interests in managed investment schemes (excluding IDPS)	Yes	
Securities	Yes	

We are authorised to:	Walsh & Company Asset Management Pty Limited	Walsh & Company Investments Limited
------------------------------	---	--

Deal in a financial product by issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following financial products for retail and wholesale clients:

Derivatives	Yes	Yes
Foreign exchange contracts	Yes	Yes
Interests in managed investment schemes (excluding IDPS)	Yes	
Securities	Yes	Yes
Interests in own managed investment schemes		Yes

Deal in a financial product by applying for, acquiring, varying or depositing of a financial product on behalf of another person in respect of the following classes of products for retail and wholesale clients:

Basic deposit products	Yes	Yes
Deposit products other than basic deposit products	Yes	Yes
Derivatives	Yes	Yes
Foreign exchange contracts	Yes	Yes
General insurance products	Yes	Yes
Debentures, stocks or bonds issued or proposed to be issued by a government	Yes	Yes
Interests in managed investment schemes (excluding IDPS)	Yes	Yes
Securities	Yes	Yes

Underwriting to retail and wholesale clients:

An issue of securities	Yes	
Interests in a managed investment scheme	Yes	

When providing these financial services and products each company acts on its own behalf.

Information about Walsh & Company Asset Management Pty Limited and Walsh & Company Investments Limited

Walsh AM and Walsh Investments are members of the of the Evans Dixon Limited (ABN 54 609 913 457) (Evans Dixon) group of companies.

Other companies in the Evans Dixon group of companies and their associates may provide services and receive remuneration, fees and other benefits from you, which are attributable to, or in respect of, financial services provided by us. For example, where an Evans Dixon group entity may be a financial adviser, service provider, responsible entity, custodian, product issuer or investment manager in relation to a product issued or managed by Walsh AM or Walsh Investments, they may charge various upfront and ongoing fees and costs including advisory fees, entry fees, service fees, capital raising fees, management fees, withdrawal fees and administration fees in relation to your investment in that product. We will provide you with details of these relationships and the fees in the relevant PDS or other advice or disclosure document related to that product.

Walsh AM provides investment management services to managed investment schemes and investment companies. Walsh Investments is a responsible entity for managed investment schemes and an asset holder and/or custodian in relation to certain funds for which it is the responsible entity, and their underlying sub-trusts.

Entities which Walsh AM and Walsh Investments are associated with include, without limitation, the following entities; Dixon Advisory & Superannuation Services Limited (ABN 54 103 071 665, AFSL 231 143), Dixon Advisory Super Pty Limited (ABN 55 139 490 118), Dixon Advisory Property Pty Limited (ABN 92 140 049 583, ACL 386 600), Dixon Advisory USA Inc, Dixon Projects LLC, Dixon Asset Management USA Inc, Dixon Realty Advisory LLC trading as Pure Properties, Walsh & Company Investment Services Pty Ltd (ABN 39 163 814 346), Fort Street Real Estate Capital Pty Ltd (ABN 19 164 101 731), Fort Street Real Estate Development Pty Ltd (ABN 43 607 611 307), Fort Street Real Estate Leasing Pty Ltd (ABN 47 607 611 325), Evans Dixon Corporate Advisory Pty Limited (ABN 21 137 980 520, AFSL 338885), Fort Street Capital Pty Ltd (ABN 13 164 101 704, AFSL 497000), Australian Fund Accounting Services Pty Ltd (ABN 90 164 701 946), URF Investment Management Pty Limited (ABN 21 600 188 805), New Energy Solar Manager Pty Limited (ABN 57 609 166 645), Evans and Partners Pty Ltd (ABN 85 125 338 785, AFSL 318 075) and Evans and Partners Investment Management Pty Limited (ABN 29 619 080 045).

Remuneration

Walsh AM receives fees and other benefits for the services and products it provides. The fees and benefits may be received in various ways, including entry fees, capital and debt raising fees, asset acquisition and disposal fees, management fees, performance fees and transaction costs. Walsh AM may also provide product issuer services for those funds or investment companies and may receive fees in relation to the applications received.

Walsh Investments receives fees and other benefits from these funds which may include entry fees, capital and debt raising fees, structuring and handling fees, responsible entity fees, custody fees, administration fees and transaction costs.

The fees and other benefits that we receive in relation to each product are set out in the relevant PDS, Prospectus or other disclosure document, announcements or website relating to that fund or investment company. Typically, investment management fees will be calculated

as a percentage of the value of the portfolio of assets managed; performance fees are calculated according to the outperformance of the relevant investment vehicle relative to the selected index and the relevant hurdle, if any; responsible entity, custody and administration fees will be calculated as a percentage of the assets of the fund; and product issuer fees will be calculated as a percentage of funds raised.

Our staff are paid a salary by ED Operations Pty Limited (ABN 73 080 207 076) and may be entitled to receive discretionary bonuses and non-monetary benefits. These bonus payments are not an additional cost to you.

We may pay stamping or service fees or provide benefits to financial services intermediaries where the law permits us to do so and may provide benefits to related parties as detailed under the heading 'Associations and related parties' below.

The directors of Walsh AM and Walsh Investments may also be directors of the investment vehicles for which Walsh AM is the investment manager and Walsh Investments is the responsible entity and/or custodian, as well as the trustees of the underlying sub-trusts. The directors do not receive any director's fees as directors of the investment vehicles but do receive remuneration from ED Operations Pty Limited, the parent company of Walsh AM and Walsh Investments.

Personal Information

As financial services providers, Walsh AM and Walsh Investments may collect information about you because we are required, or authorised to, by law. We are committed to implementing and promoting a Privacy Policy, and any information collected will be handled in accordance with that policy. A copy of our Privacy Policy can be obtained by visiting walshandco.com.au or can be provided to you, free of charge upon request.

Providing instructions to us

In providing financial services we act on your instructions which may be provided to us in writing, by telephone, fax, email or any other form of communication.

Complaints

If you have a complaint or concern about the service provided to you, please contact our Complaints Resolution Officer.

Once we receive your complaint, we will investigate the matter and endeavour to address it as quickly as possible.

Complaints Resolution Officer

PO Box 29, Crows Nest NSW 1585

T 1300 883 158 F 1300 883 159

E complaints.resolution@walshandco.com.au

We expect that we will be able to completely resolve any issues you raise. If, despite our best efforts, you believe your complaint has not been satisfactorily dealt with, or if you have not received a response within 45 days, you may wish to refer your complaint to an independent External Dispute Resolution Scheme:

Australian Financial Complaints Authority

Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678
Post: GPO Box 3, Melbourne VIC 3001

Professional Indemnity Insurance

Walsh AM and Walsh Investments have professional indemnity insurance in place that covers the financial services they provide. This cover is subject to terms and exclusions and meets the requirements under Section 912B of the Corporations Act 2001 (Cth) and ASIC policy guidance. Cover is included for claims made in relation to the conduct of representatives who no longer work for us (but who did at the time of the relevant conduct).

How you can contact us

If you have any questions about the financial services we provide, please contact us at:

1300 883 159
PO Box 29
Crows Nest NSW 1585