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# FINANCIAL SERVICES GUIDE

**HUB24 Custodial Services Ltd**  
**ACN 073 633 664 AFSL 239122**

[www.hub24.com.au](http://www.hub24.com.au)

6 March 2023

## ABOUT THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide ('FSG') is an important document we are required to give to you as an Australian Financial Services ('AFS') licensee and contains information about HUB24 Custodial Services Ltd (ABN 94 073 633 664, AFSL 239 122) ('HUB24 CS', 'we', 'us' or 'our') and the financial products and services we offer.

This FSG is designed to help you decide whether to use the services and products we provide which are described below.

This FSG also provides information about:

- who we are and how we can be contacted
- what financial services and financial products we're authorised to provide you
- other documents you may receive relating to the financial products or services we offer
- who we act for when providing the financial services
- what remuneration or other benefits we, our staff or other relevant parties receive
- our associations or relationships and potential conflicts of interest
- how we collect and use your personal information and how you can access our Privacy Policy
- information on how complaints are dealt with, including our internal and external dispute resolution procedures
- our compensation arrangements.

## ABOUT HUB24

HUB24 CS is a financial services provider and wholly owned subsidiary of HUB24 Limited (ABN 87 124 891 685), a company listed on the Australian Securities Exchange (ASX code: HUB) ('HUB24'). HUB24 CS is the Operator, Administrator and Promoter of the HUB24 investment platform (the "Service") and the HUB24 superannuation platform (the "HUB24 Super Fund") – collectively referred to as the HUB24 investment and superannuation platform). HUB24 CS provides investment services to the HUB24 Super Fund. HUB24 CS has also been appointed as the investment adviser, custodian and administrator of certain non-unitised registered managed investment

schemes (each a "Scheme") through which managed portfolios are available through the HUB24 investment and superannuation platform.

HUB24 CS is also the provider of HUB24 SMSF Access which offers trustees a simple and efficient way to establish and operate their SMSF. HUB24 SMSF Access is a three-part service where we will support investors to:

- establish their SMSFs via the separate HUB24 SMSF Establishment Service;
- invest via the HUB24 investment platform; and
- obtain administration services via the HUB24 SMSF Administration Service, which is a feature of the HUB24 investment platform.

HUB24 CS provides the HUB24 SMSF Establishment Service, HUB24 SMSF Administration Service, is the Operator of the HUB24 investment platform, and engages other related bodies corporate and external suppliers in providing these services. Refer to 'Other Service Providers' below for further information.

HUB24 CS does not provide any personal financial advice, but through your chosen adviser and the HUB24 investment and superannuation platform, you can gain access to a range of managed and direct assets, insurers, term deposits and margin lenders.

## STATEMENT OF ADVICE

If your adviser provides you with personal advice, then they must provide you with a Statement of Advice ('SOA') or Record of Advice ('ROA') which (amongst other things), will generally include:

- the name and contact details of your adviser
- advice for the investment options available through our investment and superannuation platform (as relevant) and whether they're suitable for your relevant personal circumstances and objectives, as well as the basis of the advice
- information on the nature and scope of discretion you authorise your adviser to exercise on your behalf
- information on fees and/or commissions
- any other interests or associations that might reasonably be taken to have an

influence on the advice provided by your adviser, and

- warnings that the products recommended may not be suitable for you if you have provided limited or inaccurate information regarding your relevant personal circumstances, or if these circumstances change.

## OTHER DOCUMENTS YOU MAY RECEIVE

In addition to the SOA or ROA, your adviser will provide you with the Investor Directed Portfolio Service (IDPS) Guide and/or Super Product Disclosure Statement ('PDS') and/or SMSF Establishment Guide as well as any relevant disclosure documents for the underlying products or investment options you wish to invest in through the Service or the Fund..

It's important you read these documents as they contain information to help you make an informed decision about any underlying product in which you propose investing as well as the Service or the Fund (as relevant), such as:

- the terms and conditions of our investment and superannuation platform
- the terms and conditions of our SMSF Establishment Service;
- any associated costs, fees and charges that we may receive, and
- any significant associated benefits and risks.

Please contact your adviser for more information.

## EXTERNAL PARTIES

### Trustee

HTFS Nominees Pty Limited (ABN 78 000 880 553, AFSL 232500, RSE Licence Number L0003216) ('Trustee') is the Trustee and issuer of the Fund administered on the platform.

The Trustee appointed HUB24 CS as promoter, administrator, investment manager and custodian of the Fund. The services provided by HUB24 CS include administration of investments, investment management, client services and custody services. The Trustee remunerates HUB24 CS for providing these services and these costs are paid out of the fees paid by members in the Fund.

### Responsible Entity

Ironbark Asset Management (Fund Services) Limited ABN 3 116 232 154 AFSL 298626 ('Ironbark') is the responsible entity of a non-unitised and registered managed investment scheme known as the HUB24 Managed Portfolio Service ARSN 645 033 941 ('HUB24 Managed Portfolio Service') and is available through the HUB24 investment and superannuation platform.

Ironbark as well as other responsible entities (REs) that are approved by HUB24 CS may also be the RE of other non-unitised and registered managed investment schemes (each, a Scheme) available through the HUB24 investment and superannuation platform.

The services provided by HUB24 CS in respect of the HUB24 Managed Portfolio Service and each Scheme include administration of investments, investment management, client services and custody services. Ironbark and the REs remunerates HUB24 CS for providing these services.

### Sub-Custodians

We outsource most custodial functions for the platform to third party sub-custodians. These sub-custodians are:

- BNP Paribas S.A. (662 042 449 RCS Paris) 16, boulevard des Italiens 7 5009 Paris France

BNP Paribas Australia Branch (ARBN: 000 000 117) Level 6, 60 Castlereagh Street, Sydney NSW 2000.

- Clearstream Australia Limited (ABN 53 062 527 575, AFSL 230684) Level 3, 1 Bligh Street, Sydney NSW 2000.

The sub-custodian holds the assets for HUB24 CS, as the Operator and custodian of the Service and is not obliged to recognise

any right or interest of any other person in relation to the assets. This means that there is no direct relationship between you and the sub-custodian, and that the sub-custodian does not provide any services directly to you.

Legal title to the assets will generally be held on trust, except where the assets are located in a place outside of Australia and either the law in that place does not recognise trusts or it is not reasonable for the assets to be held on trust in accordance with the law in that place. In all cases, the Operator must ensure that it is satisfied that the assets are held in a manner that, having regard to the relevant laws, provides reasonably effective protection in case of insolvency of the person holding the property. The Operator holds its beneficial interest in these assets on trust for you.

We and the sub-custodians are obliged to use your assets only for the purposes permitted under the terms of our investment and superannuation platform.

The sub-custodian will generally be entitled to be indemnified out of the assets of your account for expenses legitimately incurred by the sub-custodian in the exercise of its custodial functions. The sub-custodian may also hold a lien<sup>1</sup> over assets in your account in respect of such expenses. This may delay the return of your account's assets or, in limited circumstances, could mean that a portion of your accounts assets may be sold by the sub-custodian to enable it to recover expenses legitimately incurred by it.

The Operator also maintains a register of the underlying holdings for each investor in the Service. Your Australian and international listed securities and cash holdings are held on your behalf by us as your custodian, or by any sub-custodian we may appoint, while you retain beneficial ownership. We reconcile our records with the sub-custodian's records on a daily basis.

We reserve the right to change the sub-custodians or custodial structure of the Service from time to time without notice, including by appointing or removing custodians or sub-custodians to hold your assets. In the event of any such change, you will remain the beneficial owner of the assets.

The cash in your cash account in the Service and in Schemes is held either by us or by a sub-custodian (or their nominee), typically in an omnibus account with an Australian bank or other authorised deposit-taking institutions ("ADI"s).

Sub-custodians may also use an omnibus bank account which means that your monies can be co-mingled with other beneficial owners within the Service. HUB24 CS, at all times maintains records showing your entitlement to your monies within this omnibus account.

### Other service providers

We appoint various service providers including responsible entities for Schemes and portfolio managers to construct and manage the managed portfolios within Schemes available through the HUB24 investment and superannuation platform, broker(s) to carry out trades made in client accounts and various other service providers. Full details of all investment choices, including applicable fees, are available via InvestorHUB or from your adviser.

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<sup>1</sup> A right to retain possession of assets pending payment of a debt, or discharge of some other obligations by the owner of the assets.

## HOW TO CONTACT US

We may be contacted on:

<b>Telephone</b>	1300 854 994 (8.00am – 7.00pm, Sydney time)
<b>Mail</b>	HUB24 Custodial Services Ltd GPO Box 529 Sydney NSW 2001
<b>Email</b>	<a href="mailto:admin@hub24.com.au">admin@hub24.com.au</a>

## OUR FINANCIAL SERVICES AND PRODUCTS

HUB24 CS holds an AFS Licence that authorises us to provide the following financial services to wholesale and retail clients.

We act on our own behalf in providing these financial services and are responsible to you for the financial services we provide to you.

Financial service	Classes of financial products
<b>Provide general financial advice</b>	<ul style="list-style-type: none"> <li>• Interests in Managed Investment Schemes including investor directed portfolio services</li> <li>• Superannuation</li> <li>• Basic and non-basic deposit products</li> <li>• Derivatives</li> <li>• Debentures, stocks or bonds issued or proposed to be issued by a government</li> <li>• Certain life products</li> <li>• Securities</li> <li>• Margin lending facilities</li> </ul>
<b>Deal in a financial product by issuing, applying for, acquiring, varying or disposing of a financial product</b>	<ul style="list-style-type: none"> <li>• Interests in Managed Investment Schemes including investor directed portfolio services</li> <li>• Derivatives</li> <li>• Securities</li> </ul>

<b>Deal in a financial product by applying for, acquiring, varying or disposing of a financial product on behalf of another person</b>	<ul style="list-style-type: none"> <li>• Interests in Managed Investment Schemes including investor directed portfolio services</li> <li>• Superannuation</li> <li>• Basic and non-basic deposit products</li> <li>• Derivatives</li> <li>• Debentures, stocks or bonds issued or proposed to be issued by a government</li> <li>• Certain life products</li> <li>• Securities</li> <li>• Margin lending facilities</li> <li>• Miscellaneous financial investment products</li> </ul>
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<b>Custody</b>	<ul style="list-style-type: none"> <li>• Operate investor directed portfolio services</li> <li>• Operate other custodial or depository services</li> </ul>
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## GENERAL FINANCIAL ADVICE

HUB24 CS provides general financial advice only for the products and services offered. This advice is not personal advice as it doesn't take into account your individual objectives, financial situation, needs or circumstances.

The suitability of investments available via our investment and superannuation platform will depend on your individual circumstances, objectives and needs and must be discussed in detail with your adviser before investing with us.

## PROVIDING INSTRUCTIONS TO US

We can receive instructions by:

- email
- telephone
- mail
- online via InvestorHUB, AdviserHUB and SupportHUB.

Unless otherwise authorised, your adviser must instruct us on your behalf in relation to

your investment instructions which must be authorised and directed by you at the time.

For more information on how we accept instructions, please refer to the relevant disclosure documents of our investment and superannuation platform.

## REMUNERATION AND OTHER BENEFITS WE RECEIVE

We will receive remuneration for the provision of financial services to you. This includes remuneration from the fees you pay for investing in either the investment or superannuation platform or other remuneration that we may receive from third parties in connection with your investment.

The fees, charges and other benefits ('Fees') that we receive depend on the financial product you select and the underlying investments that you choose through the platform.

As Operator of the Service, we are entitled to the fees charged in respect of that service. The Trustee is entitled to the fees charged in respect of the Fund. The Responsible Entity is entitled to the fees charged in respect of the Scheme. As a service provider to the Trustee, we receive a payment from the Trustee. As a service provider to the Responsible Entity, we receive a payment from the Responsible Entity.

Detailed information on the Fees payable in respect of each product are set out in the relevant IDPS Guide or Super PDS.

Your adviser may also charge you initial and ongoing fees for providing financial product advice and other services to you. These fees are paid to your adviser directly from your investment and/or superannuation account and are not paid to us. Such fees will be set out in a separate Financial Services Guide and/or SOA you receive from your adviser.

Please refer to your adviser for more detail.

## OTHER REMUNERATION

### Alternative forms of remuneration

From time to time and subject to applicable law, there may be other direct or indirect benefits that we may receive from providers of some of the financial products or investment options available through the platform. We may also be entitled to remuneration from financial institutions (including banks, fund managers, investment portfolio managers, responsible entities and insurers) whose financial products are available through the platform.

We record any alternative forms of remuneration we receive in a register, and you may request details of these forms of remuneration.

### Product providers

If you invest in an underlying financial product or service, including managed funds, Schemes, term deposit products and life insurance, the product issuer or operator will receive remuneration in relation to your investment. The fees and costs applicable to the products and services will generally be set out in the relevant Product Disclosure Statement or other disclosure document for that product or service. We may receive rebates or other benefits from those third parties. However, any such remuneration is paid to us from the third-party product issuer or service provider and is not an additional cost to you.

### Payments to advisers or third parties

In some cases, we and/or our related body corporates may make payments or provide other benefits to third parties who have referred you or your adviser to us. These payments will not be an additional cost to you but will be paid by us. Details of any remuneration or payments they receive must be provided to you by the referrer.

## Remuneration and benefits received by other members of the HUB24 Limited group

HUB24 Management Services Pty Limited (ACN 135 332 320) ('HUB24 MS'), a subsidiary of HUB24, is the services company providing personnel and other resources in connection with HUB24 CS. Other subsidiaries within the HUB24 group of companies may also provide services in connection with HUB24 CS and HUB24 CS may pay those entities fees for the services they provide, including but not limited to, HUB24 SMSF Access.

Staff and directors (and in some cases their associates) ('Staff') of HUB24 CS or HUB24 MS (as applicable) are remunerated based on salary (including bonuses) and may own equity and therefore participate in profits earned in relation to the HUB24 group of companies. No fees or commissions are paid to Staff of HUB24 MS or other subsidiaries within the HUB24 group of companies out of any fees paid to a HUB24 group company in connection with the financial products and services HUB24 CS provides.

Staff may receive other benefits including, for example, reduced administration fees in connection with using the IDPS or Super products. The benefits employees, directors and associates receive may also be influenced by meeting performance targets, such as growth, product innovation and other appropriate performance measures.

## GENERAL INFORMATION

### Associations and relationships within the HUB24 Limited group

Agility Applications Pty Ltd ABN 76 124 078 315 ('Agility'), HUBconnect Pty Ltd ABN 80 184 899 252 ('HUBconnect') and Class Pty Limited ABN 70 116 802 058 ('Class') are related bodies corporate of HUB24 CS and provide technology services to businesses within the financial services industry (including through the use of their subsidiaries, where relevant).

## HUB24 SMSF Access

In providing the HUB24 SMSF Access service to you, we will engage or arrange for others to perform services to assist us. These services include, without limitation:

- the provision of the required SMSF fund establishment documents by NowInfinity Pty Ltd ACN 154 927 376 ('NowInfinity'), which is a related body corporate of HUB24 CS. NowInfinity is owned by Class, which is a wholly owned subsidiary of HUB24 Limited ACN 124 891 685;
- fund and member administration services by HUB24 CS, with software provided by NowInfinity and Class Technology Pty Ltd ACN 121 158 503 (a subsidiary of Class);
- the provision of tax agent services by HUB24 Management Services Pty Limited ACN 59 135 332 320, or another related body corporate of HUB24 CS; and
- the provision of SMSF audit, legal advice and actuarial services.

The entities providing these services may change from time to time, as notified to you.

No subsidiaries of HUB24 Ltd have a direct interest in the investment or superannuation platform or any other relationship which may influence our provision of financial services to you.

Other than HUB24 CS, no other subsidiary of HUB24 is responsible for any statements or representations made in this FSG.

We may enter into arrangements with other financial services providers to offer our products or services badged under a name other than 'HUB24' with the same or similar terms.

## Potential conflicts of interest

Potential conflicts may occasionally arise between the interests of investors, advisers, ourselves and our related parties and other parties (including service providers appointed by us). HUB24 CS including its related bodies corporate; their associates, officers and employees are strongly committed to



identifying and managing personal and corporate conflicts of interest that may arise in the course of providing a financial service. To help ensure ongoing compliance with our statutory obligations, HUB24 CS has a Conflicts of Interest (Management) Policy.

## PRIVACY

Your personal information is important to us.

We collect your personal information to:

- assess your application and establish your account;
- administer your investments;
- provide our products and services to you;
- communicate with you in relation to your investments;
- administer our products and services;
- give you access to investor areas of our website;
- manage our relationship with you, such as discussing issues with you, establishing and maintaining records in relation to your investments and providing regular statements, reports and communications to you;
- let you know about other products and services offered or promoted by us;
- conduct product or service development, quality control or other product research;
- meet our legal obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) ('AML/CTF Act') and the Corporations Act;
- comply with taxation and other applicable laws. For example, *the Foreign Account Tax Compliance Act 2010* (USA) and the Common Reporting Standard introduced by the *Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016* (Cth).

We collect this information through our interactions with you, as well as in some instances from your financial adviser or other authorised representative, your organisation,

public sources and information verification services such as electronic identity and document verification services. We may also verify information collected.

If we do not collect your personal information, we may not be able to process your application, provide you with the services relating to the Service or administer your investments. It is important that you advise us as soon as possible of any changes. Also, if you give us personal information about any other individuals (e.g. directors or trust beneficiaries) you must ensure they are aware of this privacy section.

We may disclose your personal information and other information to third parties including:

- your nominated financial adviser and their licensee (including any replacement financial adviser or licensee), unless you instruct us otherwise in writing;
- your personal representative, attorney or agent (but only with your written consent);
- our related bodies corporate;
- the responsible entity of any Scheme you choose to invest in and their service providers
- our outsourced service providers who assist us with, among other things, but not limited to, custody, data storage and archiving, auditing, accounting, customer contact, legal, business consulting, identity and document verification (electronic or otherwise), banking, information technology services, data analysis or research;
- Australian bank, ADI or other financial institutions we use from time to time in respect of your cash in your cash account;
- Australian and overseas regulatory authorities and law enforcement agencies on reasonable request by those authorities or where required by law. For example, your personal information may be disclosed to the ATO or to foreign tax authorities such



as the IRS in the USA and other tax authorities in other foreign jurisdictions. The ATO may provide your personal and other information to foreign tax authorities such as the IRS. Your personal information may also be provided to other regulatory authorities such as ASIC and the Australian Transaction Reports and Analysis Centre ('AUSTRAC');

- financial institutions and other similar organisations that we deal with in the course of our corporate activities or that you have nominated;
- other third parties on your behalf for the purpose of establishing and administering your investments with us, unless you have instructed otherwise;
- to comply with a court order or in conjunction with court proceedings.

Our Privacy Policy contains information on how your personal information is collected, held, used and disclosed, the people with whom we may exchange your information and where they are located and your right to request access, correct the information we hold and how to make a complaint about a breach of the Australian Privacy Principles. Our Privacy Policy is available upon request or from our website at [www.hub24.com.au/privacy](http://www.hub24.com.au/privacy)

Our outsourced service providers are generally located within Australia but may, from time to time, be located in foreign jurisdictions. For example, currently our customer management system provider is located in the USA and also operates in the European Union.

We take reasonable steps to ensure that any recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may use your information to tell you by telephone, electronic messages (like email), online and other means, about other services and products offered or promoted by us. We may do this on an ongoing basis, but you may

opt out at any time. If you wish to opt out, update or request access to your personal information, obtain a copy of our Privacy Policy or raise any queries or concerns regarding privacy, you may contact our Privacy Officer by contacting our Client Services team on 1300 854 994 or by email at [privacy@hub24.com.au](mailto:privacy@hub24.com.au)

## HOW TO MAKE A COMPLAINT

### How we deal with complaints

We take complaints seriously, as they give us information about how we can improve our services to you. We have an internal complaints handling summary document that you can access free of charge from our website at [www.hub24.com.au/Complaints-and-dispute-resolution-process](http://www.hub24.com.au/Complaints-and-dispute-resolution-process)

### Internal dispute resolution process

We will try to resolve your complaint as quickly as possible. Each complaint or dispute is logged in our complaints register and assigned to an appropriate person to resolve.

We aim to resolve most issues within 21 business days, although the Australian Financial Complaints Authority ('AFCA') allows us up to 45 days, depending on the type of complaints. In some cases where there are complicated facts or circumstances that will take longer to address, we will keep you updated regularly on the progress of your complaint.

Should you wish to raise a complaint please contact our Complaints Officer at:

<b>Email</b>	<a href="mailto:complaints@hub24.com.au">complaints@hub24.com.au</a>
<b>Phone</b>	1300 854 994
<b>Mail</b>	HUB24 Custodial Services Ltd GPO Box 529 Sydney NSW 2001

### Trustee's complaints process

The Trustee also has a complaints handling process. If you have a complaint you should firstly contact HUB24 (refer to 'Internal dispute resolution process' above). For more complex issues, we will keep you updated regularly as to the progress of the investigation of your complaint, however reasonable efforts will be made to resolve your complaint within the required timeframe.

For complaints about superannuation death benefit distributions, there are separate timeframes under AFCA's rules and the Corporations Act 2001 (Cth). Please contact us or your adviser if you would like further information.

### External dispute resolution processes

If you are not satisfied with the outcome from our internal dispute resolution process, you can lodge your complaint with the Australian Financial Complaints Authority ('AFCA'). AFCA is the independent external dispute resolution scheme for the financial services industry.

You can contact AFCA by calling 1800 931 678, or in writing to:

**Mail:** Australian Financial Complaints  
Authority  
GPO Box 3  
Melbourne VIC 3001

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Website:** [www.afca.org.au](http://www.afca.org.au)

### Our compensation arrangements

HUB24 CS has a professional indemnity insurance policy, which satisfies the requirements for compensation arrangements under Section 912B of the *Corporations Act 2001* (Cth), in place which covers the professional services provided by us and the current and former employees and representatives of HUB24 CS.

### HUB24 Custodial Services Ltd

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