

Financial Services Guide

Last updated: 11th April 2019

Issued by: Emerald Financial Group Pty Ltd

ABN: 85 106 823 741

Australian Financial Services Licence Number: 241041

TradersCircle Pty Ltd (TradersCircle) is an
Authorised Representative of Emerald Financial Group Pty Ltd
Authorised Representative Number: 303987

Level 7

85 Queen Street
Melbourne, 3000

P: + 61 3 8080 5788

F: + 61 3 8080 5791

E: admin@traderscircle.com.au

W: www.TradersCircle.com.au

WHAT IS A FINANCIAL SERVICES GUIDE?

This Financial Services Guide (FSG) is designed to:

- Help you decide whether to use any of our financial services;
- Inform you about the remuneration and benefits received by us or any related person; and
- Inform you about how we handle complaints.

If we make a recommendation for you to acquire a particular financial product or offer to arrange the issue of a financial product to you, where applicable we will also provide you with a Product Disclosure Statement (PDS), Product Information Statement (PIS), or a Prospectus. These documents contain information about the particular financial product to assist you in making an informed decision about that product.

WHO ARE WE?

TradersCircle is a corporate authorised representative of Emerald Financial Group Pty Ltd (sometimes referred to as "The Licensee" throughout this FSG) who holds Australian Financial Services Licence Number 241041.

The licensee and its Authorised Representatives (sometimes referred to as "TradersCircle", "we", "us" or "our" throughout this FSG) provide the financial services set out in this Guide. The Licensee has authorised the distribution of this FSG, and shares the same contact details as TradersCircle.

Please be aware that your telephone calls may be recorded for training and compliance purposes. Please tell us if you do not wish for your call to be recorded.

WHAT FEES AND RENUMERATIONS DO WE RECEIVE?

By using or continuing to use our services, you agree that:

- All fees and charges received by us as described in this FSG are a benefit given to us by you, in exchange for the services provided by us;
- Representatives are paid by these fees; and
- You understand, consent to, authorise and direct us to charge you in this way.

Membership and Software Fees

We offer membership to traders at a monthly fee of up to \$249 (this includes charting software).

TradersCircle may arrange for the execution of your Share or Option trades:

If TradersCircle arranges for the execution of your Exchange Traded Security or derivative, you will receive your contract notes from the Exchange Member.

The contract note will indicate the fees charged by The Licensee and retained by the Exchange Participant.

The fee will be either a flat fee or a fee that is a percentage of the trade. The Exchange Participant will retain some of that fee.

	Member Rates	Non-Member
Derivative Transactions		
Full Service Rates	Up to \$75 or 0.65% (whichever is higher)	Up to \$100 or 1.0% (whichever is higher)
Online Rates	Up to \$45 or 0.30% (whichever is higher)	
Equities & Warrant Transactions		
Full Service Rates	Up to \$75 or 0.2% (whichever is higher)	Up to \$100 or 1.0% (whichever is higher)
Online Rates	Up to \$45 or 0.12% (whichever is higher)	

Trading Courses

TradersCircle may charge you fees to attend our Trading Courses, the fees vary and are charged depending on the duration of the program. Fees can be paid on an up-front basis, or over several months. This is always explained to you prior to enrolling into one of our Courses.

Transactions on Exchanges outside of the ASX

Transactional fees for investments outside of the ASX vary widely and as such, we are unable to disclose each possibility in this document. If your transactions are to be placed outside of the ASX the costs to you will be fully disclosed and agreed to with you prior to any investment taking place.

Portfolio Services - Administration fees

Where TradersCircle provides a Portfolio Service an administration fee of up to 1.98% per annum is charged based on the net asset value of your portfolio, with a minimum yearly payment of \$1,980. This administration fee is paid monthly in arrears at the end of the month and is directly debited from your linked Cash account. Please note this fee is discussed with you prior to investing.

Product Manager & Administration fees

There may also be management and administration fees applicable to investment products; these are outlined fully in the applicable PDS and PIS.

The licensee may receive a referral fee

Service providers may pay The Licensee a referral fee of up to 50%, for example, if you pay a service provider \$20 per month, The Licensee may receive up to \$10 per month, payable by the service provider.

How are representatives paid?

TradersCircle and The Licensee's directors and representatives are paid a salary or consultancy fees and may also receive bonuses which are calculated depending on the company's and the individual's performance.

More information about our fees and charges

Please contact us if you would like further information on our fees and charges or remuneration and other benefits received by the representatives of The Licensee. Your request, however, must be made within a reasonable time after you are given this FSG and before any financial service is provided to you.

NOTE: All prices are inclusive of GST, unless otherwise stated.

WHAT FINANCIAL SERVICES OR PRODUCTS CAN WE PROVIDE?

We are authorised to provide “general advice” on and deal in securities; derivatives (such as options) and deposit products.

This means that we can provide you with:

- General advice on securities, options and deposit products; and
- Assistance in arranging execution of security and option trades

When we provide these services we are acting on behalf of The Licensee, who is acting on its own behalf. It does not act on behalf of any other product provider.

Other services we provide include:

- Trading Courses
- Membership to our support and information services.

Our representatives include presenters, educators and technical experts, who are either employees, consultants or directors of TradersCircle, or the Licensee, or both.

For more information please see: www.TradersCircle.com.au

What do we mean by general advice?

Where we provide general advice to you, you must be aware that the information has been prepared without taking into account your objectives, financial situation or needs, and you should consider the appropriateness of the advice before acting on it. If the information relates to the acquisition of a particular financial product, where applicable you should obtain a copy of and consider the PDS, PIS or Prospectus for that product, before making any decisions in relation to it. If trading equity products, you should conduct your own research, before making any decision.

It is important for you to understand that trading options is not suitable for everyone. There is a risk that you can lose more than the value of a trade or its underlying assets. You should only act on our recommendations if you are confident that you fully understand what you are doing.

PRIVACY STATEMENT

We are committed to ensuring the confidentiality and security of your personal information.

If you do not provide some or all of the personal information requested by us, we may be unable to provide you with our products or services.

We collect information about you for the following purposes

- to assist us in providing requested products or services to you, including portfolio, trading and education services;
- to consider and assess your request for a product or service;
- to provide you with information about a product or service and invite you to marketing events;
- to protect our business and other customers from fraudulent or unlawful activity;
- to conduct our business and perform other management and administration tasks;
- to consider any concerns or complaints you may have;
- to manage any legal actions involving TradersCircle;
- to comply with relevant laws, regulations and other legal obligations, including the Anti-Money Laundering and Counter-Terrorism Act 2006 and Corporations Act 2001; and
- to help us improve the products and services offered to our customers, and to enhance our overall business.

We may need to disclose your personal information to:

- a related entity of TradersCircle;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, trading platform providers and portfolio service providers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing our payments, payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone else to whom you authorise us to disclose it or as required by law.

We may disclose personal information to recipients that are located outside Australia in some circumstances. We use cloud data storage providers that operate internationally and therefore your personal information may be sent to servers that are located overseas. It is impracticable for us to list the locations in which these servers may be located.

Our Privacy Policy (available at www.traderscircle.com.au) contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information; and
- to make a privacy complaint and how we will deal with your complaint.

COMPLAINTS PROCEDURE AND COMPENSATION ARRANGEMENTS

If you have a complaint, contact us as soon as you can on (03) 8080 5788. If the complaint cannot be resolved over the phone, put your complaint in writing and send it to:

TradersCircle
Complaints Officer
Level 7, 85 Queen Street
Melbourne, Victoria 3000

We will consider and respond to your complaint in writing within 2 weeks. Please be advised that your call may be recorded. This may assist with the complaint handling process. If you are not satisfied with our internal complaints resolution response, you can make your complaints to The Australian Financial Complaints Authority or AFCA. The licensee is a member of AFCA, which is replacing the Financial Ombudsman Service (FOS).

Mail: GPO Box 3, Melbourne, Victoria, 3001

Phone: 1800 931 678

Website: www.afca.org.au

Both the internal and external services are provided to you free of charge.

The Licensee has Professional Indemnity Insurance in place to cover itself and its authorised representatives (including us) for the financial services we provide.

This cover encompasses conduct of authorised representatives who no longer work for us, but who did at some time. The licensee believes that this cover complies with s912B of the Corporations Act 2001.