

# Financial Services Guide

Dated: 20 December 2023  
PM Capital Limited (ABN 69 083 644 731)  
AFS Licence No. 230222

This Financial Services Guide ("FSG") is intended to inform you about PM Capital Limited ("PM Capital") so that you can decide whether or not you want to use our financial products.

This FSG contains important information about:

- the products we can offer you;
- how we, and our associates are remunerated;
- our internal and external complaints handling procedures and how you can access them.

## Who is PM Capital?

PM Capital, founded in 1998, is a Sydney-based award-winning boutique investment management company with a track record of successfully managing global, Asian and Australian equities, as well as income securities. The firm is owner operated with an experienced investment team that is distinguished with a successful long term global investment track record. As at the date of this FSG, PM Capital manages in excess of \$2.7 billion on behalf of private clients, institutional investors and the clients of financial advisers.

Our goal is to build long-term wealth by investing in global markets with patience and conviction. We have won numerous awards for our investment performance. We provide an opportunity for clients to invest alongside our investment team, which has a significant investment in its managed products. We believe in always acting and investing independently, with integrity and in the best interests of our co-investors - even if that means respectfully disagreeing with the rest of the market.

On 20 December 2023, PM Capital became a wholly owned subsidiary of the ASX-listed Regal Partners Limited (ACN 129 188 450, AFSL 321789).

## Will you receive a product disclosure statement?

Before acquiring units in one of our schemes, you should be provided with a Product Disclosure Statement (PDS), which is designed to assist you to make an informed decision about the scheme. The statement will contain information about the schemes and will usually include the costs and details of other fees and charges which may apply.

You should also review the Target Market Determination of the relevant Fund to determine if your investment objectives are in line with those of the Fund(s) you wish to invest in.

To invest in one of our schemes you must complete the application form attached to the PDS.

## Will you receive a general advice warning?

A person who gives retail clients general advice (that is, advice that is not personal advice) must generally warn



the client that the advice does not take into account the client's objectives, financial situation or needs.

Where we provide you with 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 (ie in writing or verbally).

## How do you obtain further information?

This FSG contains general information about the financial services that we provide. When providing these financial services, we act on our own behalf. If you require more information, please contact us.

## What financial products and services do we offer?

PM Capital is authorised to offer the following financial products & services to retail and/or wholesale clients:

- giving general financial product advice in respect of deposit products, securities, derivatives, foreign exchange contracts, debentures stocks or bonds issued by a government, and managed investment schemes (excluding IDPS);
- dealing in financial products, in respect of derivatives, foreign exchange contracts, interests in managed investment schemes (excluding IDPS);
- dealing in financial products (on behalf of others), in respect of deposit products, derivatives, foreign exchange contracts, interests in managed investment schemes (excluding IDPS), and securities;
- operate registered managed investment schemes which may hold financial assets and derivatives; and
- operate custodial or depository services other than investor directed portfolio services.

Any advice provided by PM Capital is limited to general financial product advice which we provide, for example, in our PDSs, Target Market Determinations, fund reports, and website material. This information generally relates to product features, managing risk and return, investment market commentaries and economic overviews. We will not provide personal financial product advice.

Before you make any investment decision, we recommend that you obtain advice tailored to address your individual objectives, financial situation and needs from a licensed financial and taxation adviser.

We are responsible for the financial services provided to you under our Financial Service Licence (AFSL). We do not act as a representative for any other AFSL holder.

## What insurance arrangements do we have in place?

PM Capital holds professional indemnity insurance in place in respect of the financial services we provide to our clients. PM Capital's professional indemnity insurance covers work done by our representatives or employees during the period of their employment, even if they have since ceased to be employed by us.

**How are we paid for the financial services we provide?**

PM Capital, as responsible entity, and its related bodies corporate and associates are entitled to certain fees or other benefits from the schemes it operates or manages, the details of which are set out in the relevant PDS, or offer document, for each scheme.

Some of our brokers may have their commission soft dollared. This means that part of the brokerage fee is

credited to an account in trust for PM Capital who can utilise these monies to pay for research costs, such as, payment of Bloomberg / IRESS / Factset subscription fees that are directly linked to trading activity.

Generally, the payment received will be based on the amount you invest, and/or the performance of the scheme.

Employees and our directors may receive salaries, bonuses, and other benefits from us.

**What fees, or other benefits are paid by us?**

We do not pay direct commissions to financial advisers. PM Capital may pay (out of our resources) each master trust or wrap account through which the Funds are made available an annual fee and/or other associated fees. In addition, PM Capital may provide other types of remuneration to dealer groups and to financial advisers such as 'soft dollar' benefits (such as the expenses for professional development days, seminars, client mailings, cooperative advertising, firm commitments etc) where the law permits us to do so.

**Asset Custody Arrangements**

As far as practicable, the assets of our schemes are held in custody by independent custodians or their appointed sub-custodians (located in Australia or overseas).

The custodians are simply service providers that hold assets on behalf of the Funds, and act on the instructions of the responsible entity. The custodians do not act in a regulatory supervisory capacity.

Where it is not possible and/or practical for the custodians to hold some assets, the assets will be held (on a segregated basis on behalf of the Fund) by PM Capital in its capacity as responsible entity. You should consider the schemes' PDS for additional information.

**Related parties and service providers**

We may enter into transactions with, and use the services of, any related parties. It is our policy to ensure that such arrangements are on arm's length commercial terms. We or any related parties or any director or officer of any of them may invest in any financial product we issue or manage.

We may receive fees or derive a profit as issuer of financial products and, where applicable, fees as the investment manager.

Directors, being employees or independent directors receive a salary (from employment) or director fees. From time to time the directors may hold (directly or indirectly) interests in shares of PM Capital or financial products issued or managed by us.

**Conflicts of interest**

Potential conflicts may occasionally arise between the interests of investors, ourselves and our related parties and other parties (including service providers appointed by us). We have statutory and common law fiduciary duties to manage conflicts of interest, act in the interests of investors and, if there is a conflict, give priority to investors' interests and/or duties (as applicable).

We have policies, procedures and organisational arrangements in place to manage conflicts of interest. Our Board is ultimately responsible for the management and resolution of conflicts of interest arising in relation to the operation of the financial products we issue.

**How is my personal information protected?**

The privacy and security of your personal information is important to us. If you would like to access your information, you can contact us at the address in this FSG. A copy of our privacy policy is available on our website.

**How do I make a complaint?**

You have the right to enquire into, or complain about, our products and services. We will acknowledge any complaint within one business day of receiving it and investigate, properly consider and decide what action (if any) to take and to communicate our decision to you within 30 days or any shorter period as the law may, from time to time, require. Please telephone or write to us if you have a question or complaint.

If you are not happy with our response, or how the complaint has been handled, you may refer the complaint (at no cost) to:

Australian Financial Complaints Authority

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

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

Phone: 1800 931 678

Mail: AFCA, GPO Box 3, Melbourne VIC 3001

Where you have invested in a PM Capital Fund indirectly through an IDPS or IDPS-like service, complaints relating to the PM Capital Fund can be directed to us. Any complaints relating directly to the IDPS or IDPS-like service itself should be directed to the IDPS or IDPS-like service and not to PM Capital.

**How do I give instructions to PM Capital?**

You can provide instructions in writing, by facsimile, or by any other method allowed by us from time to time. These dealings with us are governed by our standard terms and conditions that are outlined in the PDS or offer document for each product.