

# FINANCIAL SERVICES GUIDE.

For investments in exchange traded financial products

June 2024

**Bell Potter  
Securities Limited**

Stockbrokers, providers of scaled  
exchange traded securities  
advisory, execution and settlement  
services.

Australian Financial Services  
Licence No. 243480  
ABN 25 006 390 772

Market and Settlement  
Participant of the ASX and a  
Trading Participant of Cboe  
Australia and NSX.

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**BELL POTTER**

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# FINANCIAL SERVICES GUIDE

## 1 Overview

This Financial Services Guide (FSG), dated 1 June 2024, is issued by:

- Bell Potter Securities Limited (ABN 25 006 390 772, AFSL number 243480) (Bell Potter); and
- Third Party Platform Pty Ltd (ABN 74 121 227 905, AFSL number 314341) (TPP).

In this FSG, when 'we', 'us' or 'our' are used, it means Bell Potter. You can find the contact details of us and TPP below.

### 1.1 Purpose and content of this FSG

This FSG is designed to help you to decide whether to use the services set out below. It includes information about:

- our name, contact details and the financial services and products that we are likely to provide;
- our fees and what we and other relevant people are paid for the services we offer;
- relationships which might influence us in providing financial services to you; and
- how you can complain.

#### Disclosure of Lack of Independence required under 942B(2)(fa) of the Corporations Act.

Under section 942B(2) of the Corporations Act Bell Potter Securities Ltd is obliged to disclose it is not independent, impartial or unbiased because we:

- a. receive brokerage from dealing in securities and our authorised representatives may directly share in this brokerage;
- b. are wholly owned by Bell Financial Group Ltd who also wholly owns Bell Potter Capital Ltd, a Financial Product Issuer whose products we may recommend to our clients;
- c. receive fees from third parties such as Issuers of Securities for whom we are engaged to act on capital raisings, underwritings, acquisitions and divestments.

It's important to understand that disclosing our lack of independence and detailing our remuneration structure does not reduce our obligation to act in your best interests. If you are a retail client and we give personal advice, we have a duty to act in your best interests when providing personal advice and are obliged to provide you with appropriate advice.

### 1.2 Other documents you may receive

We may also give you other documents, including:

- a Product Disclosure Statement (PDS), which will contain information about a particular financial product, including the features, benefits, fees and risks associated with that product to help you make an informed decision about it. You will receive this if either of us offer or arrange to issue certain financial products to you; or

- a Statement of Advice (SOA), which you will receive if Bell Potter provides personal financial product advice to you as a retail client. The SOA will summarise the advice, the basis of the advice, any fees or charges and any potential conflict of interest on the first occasion that advice is provided.

If a Retail Client receives Further Advice as an existing Client and there has been no material change in the Client's circumstances and the Basis of Advice is essentially the same, then Bell Potter may rely on the information that it already holds in relation to the Client's investment objectives, financial position and particular needs, and Bell Potter will not be obliged to issue the Client a further Statement of Advice (SoA) in relation to that advice. However, the Adviser is obliged to keep a Record of Advice (ROA). If you are a retail client, you can make a written request to your adviser for a copy of our RoA within 90 days from the date we provided the advice. You can contact your adviser in writing to request a record of that advice if you have not already received it. These requests can be made up to 7 years after the advice was provided. There may be a charge associated with this.

## 2 How you can instruct us

You will need to have an account with us before you can give us instructions. To open an account, you will need to complete an account opening form, containing the trading terms and conditions which should be read in conjunction with this FSG, and we will need to verify your identity.

You can also authorise someone else to act on your account by specifying this in your account application or by giving us a certified copy of a power of attorney.

Telephone is the usual method of instructing Bell Potter in relation to an Equities or an Equity Derivatives trading account, although instructions can also be given in person or in writing by mail, facsimile or email. Similarly, instructions for the acquisition or disposal of other financial products may be made in the same way. Some Equity Adviser lines may also be recorded and when they are, Clients must telephone instructions through to such a recorded dealing line.

Unless we are instructed otherwise:

- instructions to buy or sell exchange traded equities and warrants are automatically accepted on a "good till cancelled" basis;
- instructions to buy or sell exchange traded options (ETOs) and international securities are automatically accepted on a "good for the day only" basis;

We will not use our discretion to place orders on your account, except for the price and timing of the execution of an order when you ask us to, unless the Client and Bell Potter have entered into a written Managed Discretionary Agreement (MDA).

# FINANCIAL SERVICES GUIDE (CONTINUED)

ASX, Cboe Australia and the principle overseas exchange traded securities markets and can cancel transactions that have been executed.

## 3 Our contact details

Our contact details are:

### **Bell Potter Securities Limited**

GPO Box 4718, Melbourne VIC 3001, Australia

Telephone 1300 0 BELLS (1300 0 23557)

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

[info@bellpotter.com.au](mailto:info@bellpotter.com.au)

### **Third Party Platform Pty Ltd**

GPO Box 1630 Sydney NSW 2001

Telephone 1300 786 199

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

[support@belldirect.com.au](mailto:support@belldirect.com.au)

## 4 Who provides services to you

Bell Potter will execute and sponsor transactions in certain financial products and sponsor holders on CHESS.

TPP will provide clearing and settlement services for these transactions.

We provide the financial services described in this FSG under our own AFSL. When we provide financial services in relation to a financial product that we issue, then we act on our own behalf. We also distribute financial products issued by other product issuers. When we do so we may act on behalf of those product issuers.

We may also refer you to another financial services provider, and if we do we are not responsible for any products or services you acquire from that provider.

## 5 Financial services we are authorised to offer

Our AFSL authorises us to provide the following financial services to retail clients and wholesale clients:

### **Bell Potter**

- provide financial product advice on securities, derivatives, foreign exchange contracts, bonds and debentures, deposit products, managed investments, retirement savings accounts, general insurance products, investment life insurance products, life risk insurance products, and any products issued by a registered life insurance company that is backed by one or more of its statutory funds, debentures interests in managed investment schemes including Investor Directed Portfolio Services (IDPSs), interests in managed investments schemes limited to MDA services, retirement savings accounts, standard margin lending facilities, superannuation, and miscellaneous financial investment products;
- deal in a financial product by issuing, applying for, acquiring, varying or disposing of deposit products,

derivatives, foreign exchange contracts, debentures, interests in managed investment schemes including IDPSs, interests in managed investment schemes limited to MDA services, securities, superannuation, and miscellaneous financial investment products limited to MDA services; and

- deal in a financial product on behalf of another person – applying for, acquiring, varying or disposing of deposit products, derivatives, foreign exchange contracts, interests in managed investment schemes including IDPSs, interests in managed investment schemes limited to MDA services, securities, retirement savings accounts, securities, standard margin lending facilities, superannuation, and miscellaneous financial investment products limited to MDA services;
- underwriting interests in managed investment schemes and an issue of securities;
- provide custodial or depository services for listed financial products; and
- make a market for foreign exchange contracts.

Bell Potter also has access to the principal overseas exchange traded securities markets (equities and options).

### **TPP**

- provide general financial product advice for derivatives, interests in managed investment schemes (including IDPSs) and securities;
- deal in a financial product by issuing, acquiring, varying or disposing of a derivative;
- deal in a financial product by applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of basic deposit products, derivatives, interests in managed investment schemes (including IDPSs), securities and standard margin lending facilities; and
- operate custodial and depository services other than IDPSs.

To execute and sponsor transactions on your behalf, Bell Potter is a participant of:

- ASX, ASX Clear and ASX Settlement;
- Cboe Australia;
- the National Stock Exchange of Australia; and

TPP is a participant of ASX, ASX Clear and ASX Settlement and a trading participant of Cboe Australia.

## 6 Our fees and how we and other relevant people are paid

In summary, we are remunerated through:

- the fees that we charge you — these are set out in Appendix A; and
- commissions or other benefits that we receive from product issuers which we have an association or relationship with (including product issuers that are

related to us) — these are set out in Appendix B.

Representatives of Bell Potter who act as advisers may be paid through one or a combination of a salary, discretionary bonus, and a proportion between 0–50% of all brokerage, commission and fees generated from their clients (depending on their salary level and the aggregate revenue they earn for Bell Potter).

Representatives of TPP are paid a salary and may also receive bonuses.

Additionally, where:

- you have been referred to either of us by a third party; or
- we provide you a service that requires either of us to use a third party financial services provider,
- each of us may be required to share a percentage of the brokerage, commission, insurance premium or any other charges with the other party.

## 7 Our associations with product issuers

We have associations and relationships with product issuers that might reasonably be expected as capable of influencing the services we provide you:

- Bell Potter and TPP are subsidiaries of Bell Financial Group Limited (BFG). We may offer to issue to you, arrange for the issue to you or deal in financial products that have been issued by a related entity of BFG.
- We may have associations or relationships with unrelated product issuers through which we may receive commissions or other benefits.
- Citi Group provides research, which is provided as general securities advice to Bell Potter to assist it in the provision of its investment advisory services. Citi Group also provides execution, settlement and custodial settlement services for international securities traded on overseas exchanges.
- Morningstar provides research to Bell Potter in relation to local and international listed securities, unlisted managed investments, and company profile information.
- Bell Potter Personal Superannuation Solution and Bell Potter SMSF Command have been established in conjunction with industry professionals - SuperGuardian Pty Limited.
- Bell Potter is a related entity of:
  - Bell Potter Capital Limited, which is the issuer of the Bell Financial Trust and is a Margin Loan provider.

## 8 The research we obtain from third parties

We source research and market news from several providers, and take no responsibility for information from these providers.

## 9 How we protect your personal information

Your privacy is important to us. We comply with the Privacy Act 1988 (Cth) which includes the Australian Privacy Principles. For more information, please read our Privacy Policy at [www.bellpotter.com.au](http://www.bellpotter.com.au).

## 10 Our compensation arrangements

We have professional indemnity insurance that satisfies s912B of the Corporations Act. You can also make some types of claims to the National Guarantee Fund, and you can read more information about this at [www.segc.com.au](http://www.segc.com.au).

## 11 How you can complain

We will attempt to resolve any complaint you have about our service. If you are dissatisfied with any aspect of our service, you can make a complaint by:

1. contacting your Adviser or their State Manager;
2. if this does not resolve your complaint, contacting our Compliance Department at [compliancemailbox@bellpotter.com.au](mailto:compliancemailbox@bellpotter.com.au);
3. if you are still not satisfied, you can make an external complaint to the Australian Financial Complaints Authority Limited (**AFCA**) of which we are members. AFCA can be contacted at:

### **Australian Financial Complaints Authority Limited**

GPO Box 3, Melbourne, Victoria 3001

Telephone 1800 931 678

Facsimile (03) 9613 6399

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

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

## 12 Our liability

We are not liable for anything we either do, or fail to do, based on an instruction which we reasonably believe is from you or someone acting on your behalf. We are also not liable for failing to carry out your instructions or effecting settlement of your transactions if something happens which we can't control.

We will not be liable to you for the consequences of not receiving a notification due to us relying on the wrong email address, when you failed to notify us of a new email address.

BFG and its subsidiaries do not guarantee or have any liability to you in respect of the services or the obligations or performance of Bell Potter or TPP.

# APPENDIX A - FEES AND CHARGES

## Bell Potter

It is essential that you discuss brokerage fees with your adviser.

Generally speaking, the Corporations Act bans the payment of conflicted remuneration (including commissions and volume based payments). The payment of Brokerage in share transactions is explicitly exempt via regulation 7.7A12D.

We may receive commissions, volume-based bonuses or other benefits that are currently “grandfathered” from the conflicted remuneration regime in the Corporations Act. The amount of these benefits will vary between product issuers.

In addition to brokerage charges, additional electronic exchange fees may apply for transactions executed on some US exchanges. These fees can be found on the relevant exchange website and may change from time to time.

## BROKERAGE AND FEES

### Equity and equity derivatives

- A brokerage fee is payable on all local and international Equities, Options and Warrant transactions, both purchases and sales, and, as a payment for services, such brokerage attracts GST.
- The brokerage rate will depend on the type and level of service required and provided, the size and the frequency of the transaction. Rates are subject to negotiation with your adviser. The maximum rate is 3% plus GST, depending on the level of service agreed with your adviser.
- Subject to minimum amounts per transaction detailed below, the rate is usually calculated as a percentage of total consideration of each transaction.

The minimum brokerage fee (excluding GST) is, for:

Local Equity and Warrant transactions	\$115 per contract	
Local Exchange Traded Option transactions	\$80	
Bank Bills or Fixed Interest instruments	\$55	
US security transactions	AUD\$150 or 1%	The foreign currency will be converted into Australian dollars or vice versa (or any other currency) to enable settlement. The foreign exchange transaction may result in us receiving a currency spread of 20 – 50 basis points.
Transactions in other overseas markets	Equivalent to the minimum charge for local transactions	

### ASX Clear

ASX Clear charges fees, although the exact cost of a transaction will be disclosed on your Trade Confirmation.

Transaction fee per share option contract	\$0.13 plus GST
Exercise fee, if you exercise a share option	\$0.55 per contract, including GST
Exercise and transaction fee, if you exercise an index option	\$0.39 per contract including GST

\*Note that the ASX may change these fees by way of market notice. This FSG is reviewed periodically and will be updated accordingly.

### Foreign exchange

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- Margin Foreign Exchange transactions will be charged an amount of brokerage between 1-5 basis points of the secondary currency, depending on the transaction size. This is also subject to GST.
  - It is important that you confirm the brokerage to be charged with your Adviser.
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### Initial public offerings and other offers of financial products

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- In the event of an initial public offering or other offer of a financial product, TPP will receive a commission from the issuer or underwriter.
  - Up to 6% of any investment in an initial public offering or other offering of financial products may be paid as a stamping fee.
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## APPENDIX A - FEES AND CHARGES (CONTINUED)

### OTHER FEES

Type of fee	Amount of fee and further information
<p><b>Financial planning fee</b></p> <p>A fee may be payable for the preparation and/or review of a financial plan.</p>	<p>Subject to negotiation with your Adviser, but likely to be based on the complexity of the plan.</p>
<p><b>Account Keeping fee</b></p> <p>A fee may be payable to cover costs associated with:</p> <ul style="list-style-type: none"> <li>- Ongoing technological investment</li> <li>- Managing comprehensive administrative systems</li> <li>- Meeting significant training requirements</li> <li>- Regulatory levies</li> <li>- Infrastructure costs</li> </ul>	<p>The amount of the fee will be \$990.00 p.a. incl. GST and can be waived at your adviser's discretion.</p>
<p><b>Managed discretionary account</b></p> <p>A fee may be payable if we provide a managed discretionary account.</p>	<p>Subject to negotiation with your Adviser, but it can be either based on a transactional charge or on the value of the portfolio or a mixture of both.</p> <p>Please refer to the FSG Addendum to MDA Services, which along with this document forms the FSG for Bell Potter Securities Limited, for more information regarding its operation.</p>
<p><b>Portfolio Administration Service</b></p> <p>A fee may be payable for any portfolio management and administration services we provide.</p>	<p>Subject to negotiation with your adviser. The amount of the fee will vary depending on the size of the portfolio, the level of and the nature of the administration services required</p>
<p><b>Failed payment fees on ASX or Cboe Australia</b></p> <p>If a transaction is not settled by a specified time, ASX or Cboe Australia could impose fees.</p>	<p>The amount of these fees will vary depending on the transaction. There is a wide range of fail fees for transactions on ASX or Cboe Australia. You can request more information by contacting your Adviser.</p>
<p><b>Failed payment fees</b></p> <p>Cheque or Direct Debit failures (dishonours) will attract fees, in accordance with the terms for this service.</p>	<p>The amount of these fees will vary depending on the transaction.</p>
<p><b>Failed payment interest</b></p> <p>If you fail to pay for purchased securities by the specified settlement date, Bell Potter may charge interest on the outstanding balance, in accordance with the terms for this service.</p>	<p>Interest will be charged six percentage points above Bell Potter's Bank Base Rate calculated and payable daily from the date due for payment until the amount is paid.</p>



## COMMISSIONS

Type of account	Type of commission	Commission amount
<b>Managed investments</b>	We may receive a trailing commission from the managed fund provider.	Usually around 0.25% per annum of the value of the managed investment.
<b>Cash management</b>	Bell Potter may receive a commission for funds invested in the Bell Financial Trust or its Cash Management Service and Cash Management Trust Accounts.	Usually up to 0.25% per annum on the funds invested.
<b>Margin lending</b>	Bell Potter may receive a commission for margin lending.	Usually up to 0.5% per annum on the outstanding balance of a margin lending facility.
<b>Warrants</b>	We may receive a rebate on warrants promoted by warrant issuers.	Generally 2.2% inclusive of GST. This may be charged to you in addition to brokerage fees.

# APPENDIX B - BELL POTTER BEST EXECUTION POLICY

The policy in this Appendix (**Best Execution Policy**) outlines how Bell Potter will take reasonable steps to obtain the best execution outcome for you.

In this policy, when 'we', 'us' or 'our' is used, it only means Bell Potter, not Bell Direct.

We have provided this information to help you make an informed decision about whether to instruct Bell Potter to handle and execute orders.

## **BPSL When this policy applies**

In accordance with Part 3.8 of the ASIC Market Integrity Rules (Securities Markets) 2017, we are required to take reasonable steps to obtain the best outcome for our retail clients and wholesale clients (Best Execution Obligation), whenever we receive, transmit or execute an order from a client to buy or sell. For the purpose of this policy, an equity market product includes any of the following products which are admitted to quotation on ASX:

- shares;
- interests in a registered scheme;
- interests in an unregistered managed investment scheme, other than a scheme in relation to which none of Corporations Act paragraphs 601ED(1)(a), (b) and (c) are satisfied;
- rights under a rights issue to acquire an interest in a registered scheme or a share;
- CHESS Depository Interests (CDIs); and
- transferrable custody receipts;

If a company is dual listed in Australia and an overseas exchange, the Policy will apply only to trading on Australian exchanges.

## **Execution venues**

We will consider ASX TradeMatch, ASX CentrePoint and Cboe Australia as possible execution venues for a trade. ASX TradeMatch is our default market. We currently will not send orders to ASX PureMatch due to the limited liquidity on that venue. We do not operate a crossing system.

## **Best outcome**

The 'best outcome' means different things for different clients.

For retail clients, we will take reasonable steps to obtain the best total consideration on the sale or purchase, including transaction costs such as brokerage and GST, unless you instruct otherwise.

For wholesale clients, unless you instruct otherwise, we will take reasonable steps to obtain the 'best outcome' by reference to:

- price – the price at which a financial instrument is or may be executed. Greater relative importance will generally be given to this factor;
- costs – including implicit costs (such as the possible market impact), explicit external costs (such as exchange

or clearing fees and explicit internal costs (which represents Bell Potter's remuneration through commission or spread);

- order size – which may affect the execution price;
- total consideration – which may be interpreted as the best purchase or sale price of a relevant product while material differences in transaction costs between licensed markets do not exist;
- execution speed – which is the potential time it might take to execute a transaction given the liquidity of the market;
- the likelihood of execution – the probability your transaction will be executed;
- your requirement for timely execution;
- market liquidity and depth – which may affect the execution price;
- the potential price impact of execution, specifically the change in the price of a security in response to an incoming market order;
- your instructions; and
- any other factors that may be relevant.

The weight we attribute to each factor will vary depending on the type of financial product and the characteristics of each order, our knowledge of you as our client and your execution preferences. We may discuss your preferences with you. We may also adopt different execution methods for different types of orders.

There may be several ways to execute an order. We might not achieve the best price for every transaction, but we will take reasonable steps to achieve the best result that can be reasonably expected given the information and execution methods available at the time.

We will not use our own subjective judgement when we execute orders placed through a Direct Market Access (DMA) facility due to the nature of these orders, even though the Best Execution Obligations apply to DMA trading.

## **Specific client instructions**

If you give us instructions that are inconsistent with achieving the best outcome on handling and executing your order, we must take reasonable steps to handle and execute your order in a way that satisfies those instructions, but only if your instructions are:

- clear and unambiguous;
- either:
  - given to us in writing; or
  - given to us verbally, and recorded and retained by us for seven years; and
- not contained within the terms and conditions of our service or any other standard terms that we give you.

If you are a retail client, your instructions must also be specific to a particular order.

If you are a wholesale client, you can give us specific or standing instructions. If you give us standing instructions, we must regularly review them to ensure that we continue to be able to satisfy them. You can give us standing instructions to opt-out of our Best Execution Policy, but we can only follow these instructions for 12 months, until you renew those instructions after that period.

### **Order handling practices**

We use a smart order router named the Best Market Router (BMR) to manage our Best Execution Obligations, but in some circumstances we may manually direct orders into a specific order book.

All orders that will fully or partially trade immediately (Market Orders) will be entered into the market by one of our Designated Trading Representatives (Operators), advisers or Dealer's Assistants (DAs). We will use an automated order router either via the BMR or by being directed to the appropriate order book. Once an order has exhausted the volume available within the price parameters of the order, the remainder of the order will be entered into our default market, ASX TradeMatch, subject to any specific instructions you give us.

All orders that are not Market Orders will be entered into our default market, subject to any specific instructions you give us. If the price on an alternative market changes after we have routed your order to our default market, your order will not be transmitted to the alternative market unless you have specifically instructed us to do so. This is because transmitting the order would result in a loss of priority for your order.

We may not immediately input orders into the BMR where there is discretion as to price or time, but the Best Execution Obligations will still apply.

If a particular market is unavailable for trading, unresponsive or disorderly, we will use our discretion to route your order with regard to our Best Execution Policy, unless you give us other specific instructions.

If a wholesale client gives us an Iceberg order, it is important to note that when new portions of the hidden order become pretrade transparent, they do not have priority and go to the back of the queue.

Order books do not all operate in a similar fashion. In particular:

- Cboe Australia commences trading at 10am and closes at 4.12pm (Eastern Standard Time) and there is no auction on the open, close or intra-day trading halts as there is for ASX. This difference can make it very difficult to determine which venue might achieve the best outcome. We have elected to use ASX TradeMatch as the default market, so all orders will be transmitted to ASX TradeMatch for the auction unless you instruct otherwise.
- Orders in Cboe Australia are "day only" orders and are all purged at the end of trading for the day. This should only impact those orders that have been specifically transmitted to Cboe Australia. You should instruct us

to transfer your orders from this market if you wish to participate in the end of day ASX TradeMatch auction.

### **Crossings**

In addition to crossings on one of the external licenced markets, it is possible for participants to operate their own crossing system. Such a system is an automated service provided by Bell Potter to clients that matches or executes client orders with orders of Bell Potter or other clients of Bell Potter, other than on an order book of a licensed market. Bell Potter does not currently operate such a market.

If it is deemed appropriate to transmit an order for a wholesale client to an existing crossing market with another market participant then that other market participant will be required to provide best execution.

### **Trading suspensions and technical failures**

We cannot transact or match a suspended product on any licensed market.

When an execution venue is unavailable (for example, due to a market outage or differing trading hours), we may execute existing and new orders on any remaining open execution venues if we believe that this would meet our Best Execution Obligation.

### **Changes, monitoring and review**

We will regularly monitor the effectiveness of this Best Execution Policy. To ensure that this policy remains adequate, and we will review it:

- whenever a material change is made to the policy that affects the transmission of client orders; or
- at least annually.

We will comply with reasonable requests from you to provide information to demonstrate that we have handled and executed your orders in accordance with this policy. We will provide this information within a reasonable time.

Any material changes to this policy will be available to clients on our website [www.bellpotter.com.au](http://www.bellpotter.com.au).

