

# Financial Services Guide

Belvedere Share Managers Pty Ltd  
ABN: 90 089 183 675  
AFS Licence No: 330181  
PO Box H-355 Australia Square NSW 1215  
[www.belvedereshares.com.au](http://www.belvedereshares.com.au)  
Issue date: 2 January 2023

About this Financial Services Guide	1
Belvedere Share Managers	1
Investor Profile and Suitability of Advice	2
Reporting and Communication	2
Initial Documentation	2
Other Documentation	3
Fees and Charges	3
Disclosure and Disclaimer	4
Complaint Handling Procedures	4
Professional Indemnity Insurance Cover	4

# Financial Services Guide

---

## About this Financial Services Guide

The financial services guide (FSG) is an important document intended to provide investors with sufficient information to decide whether to utilise the services and products offered by Belvedere Share Managers Pty Ltd.

## Belvedere Share Managers

Belvedere Share Managers Pty Ltd ABN 90 089 183 675 (Belvedere Share Managers) is responsible for the financial services described in this FSG. All financial services will be provided by Belvedere Share Managers. The contact details for Belvedere Share Managers can be found on page 4 of this FSG.

Belvedere Share Managers holds an Australian Financial Services Licence (licence no. 330181) and is licensed to deal in, and provide advice to retail and wholesale investors in relation to the following products:

- Securities;
- Government debentures, stocks or bonds;
- Basic deposit products;
- Other deposit products;
- Non-cash payment products;
- Managed investment schemes;
- Retirement savings accounts;
- Standard margin lending facilities; and
- Superannuation.

There are two key account types provided by Belvedere Share Managers:

- Individually Managed Accounts; and
- Stockbroking Advice and Execution Accounts.

### Stockbroking Advice and Execution Accounts

This is an account in which investors receive traditional style stockbroking advice and execution services (for all the products listed above), and in return Belvedere Share Managers may charge a commission on each completed transaction. The advice may be general advice or it may be personal advice.

### Individually Managed Accounts (IMA)

Some investors prefer Belvedere Share Managers to manage all the facets of their portfolio, including the discretion to buy or sell assets, administration, reporting, voting, banking of dividends and responding to company communications, including corporate actions.

These accounts are known as individually managed accounts (IMAs). This section of the FSG is only relevant for those investors wishing to open an IMA. This FSG complies with the conditions of ASIC's relief for providers of managed discretionary accounts.

Before an IMA service can be provided, an investor must first enter into an IMA Agreement with Belvedere Share Managers. This contract will include an investment program which is prepared in accordance with the requirements in Division 3 of Part 7.7 of the Corporations Act 2001. The investment program will contain the nature and scope of the discretions that Belvedere Share Managers will be authorised and required to exercise, any significant risks associated with the IMA contract and warnings about the importance of any limitations relating to the IMA contract which the investor must consider before signing the IMA Agreement.

There are risks associated with any investment. Specific risks applicable to an IMA include market risk, company risk, currency risk, sovereign risk and interest rate risk.

Under an IMA contract the discretion to make the investment decisions is passed from the investor to Belvedere Share Managers.

The preference for most investors operating an IMA is to have all communications (including annual reports etc.) sent directly to Belvedere Share Managers, and have Belvedere Share Managers respond to such communications on the investor's behalf.

Investors may request a copy of any communication by contacting Belvedere Share Managers.

Investors who wish to give Belvedere Share Managers specific instructions in relation to corporate actions, voting or other administrative activities may do so.

## Investor Profile and Suitability of Advice

Belvedere Share Managers endeavours at all times to provide advice which is appropriate in relation to an investor's individual objectives, current financial situation and needs. No responsibility or liability is taken by Belvedere Share Managers should investor goals not be reached or should any advice or recommendation made be unsuccessful or cause loss to the investor.

Investors are furnished with a client profile which Belvedere Share Managers asks be completed in as much detail as possible and returned to Belvedere Share Managers.

Investors may exercise their right not to divulge this information or complete a client profile. By choosing not to complete the client profile Belvedere Share Managers will provide general advice only. General advice is prepared without taking into account the objectives, financial situation and needs of the investor and the investor should therefore consider the appropriateness of the general advice in light of the above.

Investors who choose to complete the client profile should keep Belvedere Share Managers informed of any changes to their profile. This enables Belvedere Share Managers to make appropriate adjustments and recommendations for the investor's portfolio(s). If advice provided to the investor is based on personal circumstances or objectives that are incomplete or inaccurate the investor should, before acting on the advice, consider the appropriateness of the advice having regard to their personal circumstances.

## Reporting and Communication

The type of reporting provided will depend upon the account type. The key report types are set out in the table below:

Report Type	Individually Managed Accounts (IMAs)	Stock Broking Advice and Execution Accounts	Method of Delivery
Contract Notes	Every Trade	Every Trade	Email
Portfolio	Daily	Daily	Website
Dividends	Daily	N/A	Website
Cash Management Trust Balance (if applicable)	Daily	Daily	Website

Investors have online access to detailed financial statements including holdings, transactions, dividends, realised gains and losses, and fees on corporate actions.

Investors may communicate and place orders with Belvedere Share Managers using phone, fax, mail, email or face-to-face instruction. It is important that if communication is non-verbal, verification be made to ensure that instructions have been received by Belvedere Share Managers.

## Initial Documentation

### Stockbroking Advice and Execution Clients

Investors opening a Stockbroking Advice and Execution Account will receive the following initial documentation:

Document	Purpose
Application Form and Client Profile	This document is required for registration purposes and to provide details of the investor's personal profile, financial circumstances and objectives.
Terms and Conditions	This document explains how the broking account with the ASX broker is to operate and the legal responsibilities of the investor and Belvedere Share Managers.
Sponsorship Agreement	This agreement provides details of the CHESSE Sponsorship Arrangement with the ASX broker such as E*TRADE or Third Party Platform Pty Ltd.

### Individually Managed Account Clients

Investors opening an Individually Managed Account will need to complete and execute the following documents:

Document	Purpose
IMA Application Form and Client Profile	This document is required for registration purposes and to provide details of the investor's personal profile, financial circumstances and objectives.
Sponsorship Agreement	This agreement provides details of the CHESSE Sponsorship Arrangement.
Power of Attorney	This document enables Belvedere Share Managers to open accounts including bank accounts, cash

management  
trusts and

securities trading accounts, respond to company communications, vote, perform and execute share transfers and other securities transactions, on behalf of the investor.

---

These documents are all contained in the IMA Agreement which also explains how the account is to operate, the legal responsibilities of the investor and Belvedere Share Managers, and the discretions granted to Belvedere Share Managers. Depending on the investor's requirements the following additional documents may also be provided by Belvedere Share Managers:

- Stock Transfer Request for CHESS Holdings
- Cash Management Application Forms
- Direct Debit and Credit Forms
- Margin Lending Application and Documents

## Other Documentation

### Product Disclosure Statement and Target Market Determination

If Belvedere Share Managers recommends the acquisition of a particular financial product (other than securities or listed shares) investors will be provided with a product disclosure statement and target market determination. The product disclosure statement contains information such as the features, fees, benefits and risks associated with the particular product. The target market determination describes who the particular product is appropriate for (target market), based on likely needs, objectives and financial situation, and any conditions around how the product can be distributed to customers.

### Statement of Advice

Investors who require personal advice or open an IMA will be furnished with an Initial Statement of Advice confirming the information provided to Belvedere Share Managers in the investor's client profile. Ongoing Statements of Advice will be sent to investors quarterly only if a client chooses not to have web access to their portfolio and transaction details. These Ongoing Statements of Advice will contain the basis on which the advice was given and information about the amount, or method of calculating any fees and commissions payable to Belvedere Share Managers, director, employee, related body corporate or associate thereof, and any associations with product issuers or other parties that may have influenced the advice.

Belvedere Share Managers will perform an annual review of an investor's personal circumstances, objectives and investment portfolio for investors who open an IMA and obtain personal advice. An Annual Statement of Advice will be issued upon completion of the annual review, which will serve as the basis of the following year's advice.

## Fees and Charges

### Individually Managed Accounts

For IMAs, Belvedere Share Managers will charge a fee which covers management of the portfolio, all transactions and administration. This fee will be a maximum of 2% p.a. of the value of funds under management. Some IMAs may also incur an additional performance fee which will be disclosed.

### Stockbroking Advice and Execution Accounts

For Stockbroking Advice and Execution Accounts a maximum commission of 2% of the value of each trade will be charged, subject to a minimum charge of \$100.

### Floats/New Issues

Investors are not charged any brokerage in connection with subscription for shares in new issues. However Belvedere Share Managers may receive a fee from the issuer which is normally in the range of 0.5% to 1%. This fee is generally disclosed in the prospectus/product disclosure statement of each issue.

### Ancillary Fees

Out of pocket expenses charged to Belvedere Share Managers in connection with an investor's account will generally be passed on to the investor. The investor will be informed if and when this arises.

### GST

These figures do not include GST which will be added on and payable by Australian residents for all taxable supplies made.

## Disclosure and Disclaimer

Belvedere Share Managers is licensed to provide financial services and is not an issuer of financial products. Belvedere Share Managers, its associates, directors, employees or related corporate bodies may have an interest in the financial product or in the issuer of a financial product recommended. Where necessary, those interests will be disclosed in the Statements of Advice.

Belvedere Share Managers may pay fees or commissions to people who refer or introduce business. In these circumstances, the Statement of Advice will disclose the amount or method of calculating any fees or commission paid to the referrer. The referrer should also provide investors with their own FSG and Statement of Advice detailing such arrangements and amounts.

Directors and employees of Belvedere Share Managers are paid a fixed salary. Bonuses and commission payments may be payable to certain directors and employees. Bonus and commission payments may relate to performance criteria such as volume of funds under management.

## Complaint Handling Procedures

Belvedere Share Managers has internal complaints resolution procedures consistent with the Australian standard guidelines. Belvedere Share Managers is also a member of the Australian Financial Complaints Authority (AFCA).

If investors have any complaints about the service provided they should contact Belvedere Share Managers and detail their complaint.

Belvedere Share Managers will aim to acknowledge complaints within one business day of receipt. Belvedere Share Managers will act to try and resolve the complaint quickly and fairly, and within 30 days of receipt of the complaint.

If the complaint is not resolved to the investor's satisfaction the investor may complain to AFCA. AFCA may be contacted on 1800 931 678. This service is provided free of charge to the investor.

AFCA will try to resolve complaints in the most fair, effective and efficient manner possible. The AFCA process commences with AFCA collecting all relevant documents and identifying the issues in dispute. AFCA will generally first try to resolve a complaint by informal methods, and reach a settlement between the investor and the financial firm through negotiation or conciliation.

If this does not work, AFCA may use more formal methods, where it may provide a preliminary assessment or make a decision (determination). If the determination is in the investor's favour and accepted by the investor, the financial firm is required to comply with the determination and make any remedy that AFCA awards.

It may sometimes be appropriate for AFCA to make a decision immediately, rather than try to reach a settlement through negotiation or conciliation.

## Professional Indemnity Insurance Cover

Section 912B of the Corporations Act 2001 requires Belvedere Share Managers Pty Ltd to have arrangements for compensating a Retail Client for loss or damage suffered because of breaches or by our representatives/employees.

Belvedere Share Managers has in place Professional Indemnity Insurance which satisfies the requirements of Section 912B of the Corporations Act.



Belvedere Share Managers Pty Ltd

ABN: 90 089 183 675

AFS Licence Number: 330181

PO Box H-355

Australia Square NSW 1215

Australia

Email: [info@belvedereshares.com.au](mailto:info@belvedereshares.com.au)

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