

# FINANCIAL SERVICES GUIDE

DATE - 3 OCTOBER 2024  
ARGON CAPITAL PTY LTD  
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AFS Licence No.: 300250  
LEVEL 5, 83 MOUNT STREET  
NORTH SYDNEY NSW 2060  
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## A GUIDE TO OUR RELATIONSHIP WITH YOU

This Financial Services Guide (FSG) is provided to you by Argon Capital Pty Ltd (Argon Capital, we, our, us) to inform you of the financial services provided by us and to comply with our obligations as the holder of an Australian Financial Services (AFS) Licence, AFS Licence No. 300250.

If you have any questions regarding any of the information provided in this FSG you can contact us as follows:

Argon Capital Pty Limited  
ABN 18 118 585 925  
AFSL 300250  
Unit 234, 6 Cowper Wharf Roadway  
Woolloomooloo NSW 2011

Tel: (02) 9232 4935  
Email: [chris.avis@argoncapital.com.au](mailto:chris.avis@argoncapital.com.au)

This guide contains important information about:

- the services we offer you
- payment for these services
- potential conflicts of interest we may have
- internal and external dispute resolution procedures and how you can access them

In addition to this guide, we may also provide you with a Statement of Advice and/or a Product Disclosure Statement.

A Statement of Advice (SoA) is a written record of the advice provided by us to you. A SoA will detail the advice we have given you, the basis of that advice and provide information about fees, commissions and associations that may have influenced our advice.

A Product Disclosure Statement (PDS) is a type of offer document. A PDS will provide information about a product, for example, its features, benefits, fees and associated risks, to enable you to make an informed investment decision.

When we give you financial advice we are obliged to make sure the advice is appropriate to you, and we must make reasonable enquiries about your current financial situation and future needs and objectives before providing this advice. Following our initial meeting, and upon receiving a Client Account Profile from you, we will provide you with an Initial SoA, which will detail our understanding of your needs and objectives, provide a written record of the advice given, and disclose the fees and commissions payable and any associations or relationships that may have influenced our advice.

We may provide further advice to you after we have given you an Initial SoA. If we have not provided you with a record of the further advice you may request, either verbally or in writing, a record of further advice within 7 years of us providing the further advice or as prescribed by law.

If we recommend a particular Financial Product to you we will give you a PDS. Where the financial product offered to you is a new listing on a licensed securities market, for example, a new listing of securities, we will give you a prospectus which is the PDS for these products.

## WHAT YOU NEED TO KNOW ABOUT INVESTING WITH US

### Who is my adviser?

Argon Capital through the activities of its Directors/Advisers: Alex Woog and Chris Avis.

### Who is responsible for the financial services provided?

Argon Capital is responsible for the financial services provided, including the distribution of this FSG.

Argon Capital (ABN 18 118 585 925) is an Australian Financial Services Licensee (AFS Licence Number 300250).

### Do you have any relationships or associations with any Financial Product issuer?

Argon Capital has no association with any Financial Product issuer, other Financial Services Provider or other third party that is capable of influencing the advice we provide to you.

### Do you have any interests which could influence the financial services provided to us?

Argon Capital, its directors and employees may have an interest in and earn fees from dealing in the financial products that are the subject of this document. In addition, Argon Capital, its directors and employees may participate in the same new issue of securities as its clients by either investing in the issue or by taking the difference between its commitment to the underwriter and that allocated to its clients. These interests in no way influence the provision of financial services by us to you.

### What kinds of financial services can you provide me and what kinds of financial product/s do those services relate to?

Argon Capital is authorised by ASIC to provide advice and deal in the following financial products:

- Deposit and payment products;
- Derivatives;
- Government debentures, stocks or bonds;
- Managed investment schemes including investor directed portfolio services; and
- Securities

Argon Capital offers the following services to its clients:

- Advisory services which can be accessed by talking to your advisor or on our website via your personalized login and password;
- Arranging the execution of exchange traded products such as shares, options and warrants and over-the-counter products such as contracts-for-difference (CFDs);
- Portfolio management services - introducing you to an Investor Directed Portfolio Service (IDPS) operator and assisting in the management of the relationship between you and the IDPS operator;
- Arranging and managing the execution of institutional orders, such as VWAP, price sensitive trades, strategy trades, etc;
- Arranging for clients to have access to online trading systems through a third party service provider; and
- Online information services - providing you access to online account management tools and research material through a third party service provider.

Argon Capital does not offer custodial services to its clients. All assets are held in the client's name on CHESS via your ACH Clearing Participant.

If you are a Retail Client that receives personal advice, the services actually offered to you will be confirmed in the SoA issued to you by Argon Capital. For all other clients, the services we offer to you will be confirmed at the time of account opening.

### What information should I provide to receive personalised advice?

You need to provide us with a list of your personal objectives, details of your current financial situation, and any other relevant information. We can then offer you the most appropriate advice possible.

You have the right not to tell us, if you do not wish to. However, if you do not provide this information the advice you receive may not be appropriate to your needs, objectives and financial situation.

You should read the warnings, contained in the Initial SoA, carefully before making any decision relating to a financial product/s.

### What information do you maintain in my file and can I examine my file?

We maintain a record of your personal profile including details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy, that will ensure the privacy and security of your personal information. A copy of our privacy policy is enclosed for your information.

If you wish to examine your file please ask us. We will make arrangements for you to do so.

### How can I give you instructions about my Financial Product/s?

You may tell us how you would like to give us instructions. For example by telephone, fax, or other means such as e-mail.

If we provide you with execution related telephone advice, you may request a record of the execution related telephone advice, at that time or up to 7 years after providing the advice or as prescribed by law.

### How will I pay for the services provided?

You may pay us a fee, or brokerage for the services provided. Alternatively, we may receive a payment called commission, which is paid to us by the Financial Product issuer/s, as authorised by you.

Generally, our remuneration takes the form of one of the following and is governed by the agreement we enter into with you:

- Brokerage which we charge investors when we buy or sell securities for them;
- Fees charged at a fixed rate for services provided;
- Fees based on the value of a client's funds under management;
- Initial and ongoing commission paid to us, by product and service providers for referring investors to them.

Your adviser will tell you in writing in the SoA, or letter of engagement, what fees we may charge you, when you have to pay, and what payments we may receive from the Financial Product issuer/s. If you are a retail client and wish to proceed, you will need

to sign and return the Authority to Proceed which is attached to the SoA.

Our directors and employees are remunerated on a salary and commission basis for the services provided to you. This means that they may receive a portion of the fees paid by you to us, as a commission as authorised by you.

We may be required to share a percentage of the commission or other charge with external service providers. These fees and charges are governed by a Service Level Agreement between the external service provider and us, and will only be paid if authorised by you. No additional fees are charged to you, unless agreed otherwise, for the provision of a service by an external service provider.

### How are commissions, fees or other benefits calculated for providing the financial services?

While some of the fees we charge may be tax deductible, we recommend that you confirm this with a professional taxation adviser who can give consideration to your particular circumstances.

Where we are required to issue you with a SoA in connection with specific advice, that document will provide details of the fees payable in connection with that advice.

In the absence of any special arrangements, the following fees will apply. All fees specified include GST. We reserve the right to change these fees from time to time.

### Listed securities and CFDs

| Transaction Value                                | Fee (inc GST)   | Example   |
|--|---|---|
| Transaction Values up to \$6,250                 | \$137.50  | Transaction Value = \$5,000<br>Fee payable = \$137.50 (inc GST)   |
| Transaction Values between \$6,251 and \$15,000  | \$137.50 plus 2.2% of (Transaction Value less \$6,250)  | Transaction Value = \$12,000<br>Fee payable = \$137.50 + (12,000 - 6,250) x 2.2%<br>\$264 (inc GST)       |
| Transaction Values between \$15,001 and \$50,000 | \$330 plus 1.65% of (Transaction Value less \$15,000)   | Transaction Value = \$20,000<br>Fee payable = \$330 + (20,000 - 15,000) x 1.65%<br>\$412.50 (inc GST)     |
| Transaction Values greater than \$50,000         | \$907.50 plus 1.1% of (Transaction Value less \$50,000) | Transaction Value = \$90,000<br>Fee payable = \$907.50 + (90,000 - 50,000) x 1.1%<br>\$1,347.50 (inc GST) |

### New issues of securities

- If we lodge successful applications for investments in new companies, fees may be paid to us by the issuing company
- Details of these fees are usually provided in the relevant prospectus or offer document. If this is not the case, this information will be disclosed to you in the SoA or as part of the Further Advice given to you

### Exchange traded options

- For each Option bought/sold you may be charged either a minimum brokerage of \$110 (including GST) or 1.10% of the value of the trade (including GST).
- In addition to brokerage the Australian Clearing House (via your ACH Participant) charges a transaction fee of \$1.12 per share option contract (inclusive of GST). In the case of index options, ACH charges \$0.39 per contract (inclusive of GST), for both the transaction fee and the exercise fee.
- A transaction to buy 8 share option contracts with a total premium of \$16,000 will cost you \$184.96 (ie. \$160 + \$16 + \$8.96) (including GST)
- If you exercise a share option, ACH charges an exercise fee of \$0.50 plus \$0.05 GST per contract. If you are assigned on an option position, ACH charges a fee of \$0.50 plus \$0.05 GST per contract.
- Exercising 20 contracts has a fee of \$11.00 which will appear on the stock purchase or sale contract note

### Portfolio management services

For portfolio management you will pay an annual fee calculated as a percentage of the average daily value of your portfolio. The fees are charged monthly in arrears as follows:

| Portfolio Value                                     | Annual Fee (inc GST)                                     | Example  |
|---|--|--|
| Portfolio Value up to \$1,000,000                   | \$1.65%  | Portfolio Value = \$1,000,000<br>Annual Fee payable = \$1,000,000 x 1.65%<br>= \$16,500 (inc GST)<br>Monthly Fee payable = \$16,500/12 = \$1,375 |
| Portfolio Value between \$1,000,001 and \$5,000,000 | \$16,500 plus 0.825% of (Portfolio value less 1,000,000) | Portfolio Value = \$2,500,000<br>Annual Fee payable<br>= \$16,500 + (2,500,000 – 1,000,000) x 0.825%   |

| Portfolio Value                          | Annual Fee (inc GST)  | Example  |
|--|---|--|
|  |   | = \$28,875 (inc GST)<br>Monthly Fee payable = \$28,875/12 = \$2,406  |
| Portfolio Value greater than \$5,000,000 | \$49,500 plus 0.55% of (Transaction Value less \$5,000,000) | Portfolio Value = \$7,000,000<br>Annual Fee payable<br>= \$49,500 + (7,000,000 – 5,000,000) x 0.55%<br>= \$60,500 (inc GST)<br>Monthly Fee payable = \$60,500/12 = \$5,042 |

### Managed funds

If we recommend a managed fund investment to you, the relevant manager may pay us commission if you choose to invest in that product. Commission rates vary and we will discuss them with you at the time we make the recommendation. A fund manager may also pay ongoing commission to us for as long as your investment remains with them. These amounts will be paid out of the manager's own funds.

Managed Fund providers may pay Argon Capital an initial sum of up to 4% of the initial amount invested and an ongoing commission of up to 0.55% (including GST) per annum of the value of your investment.

For example if you invest \$10,000 in a managed fund Argon Capital may receive an initial sum of up to \$400 of the amount invested and an ongoing commission of up to \$55 per annum.

### Will anyone be paid for referring me to you?

Where you have been referred to us by someone else, if we pay them a fee or commission in relation to that referral, we will tell you in the SoA, or letter of engagement who will receive that fee or commission and the amount they will receive.

### What should I do if I have a complaint?

If you have any complaints about the service provided to you, you should take the following steps:

1. Contact us and tell us about your complaint.
2. If you are not happy with the response you receive, please write to our Compliance Manager at:

Argon Capital Pty Ltd  
PO Box 1039  
North Sydney NSW 2059

We will provide written acknowledgement of our receipt of your complaint, and endeavor to investigate and respond appropriately within four weeks. We will try to resolve your complaint quickly and fairly.

3. If the complaint cannot be resolved to your satisfaction you have the right to refer the matter to an independent complaints resolution body:

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001  
1800 931 678  
info@afca.org.au

If you have any further questions about the financial services Argon Capital provides, please contact Alex Woog on 0410 302 894 or Chris Avis on 0403 934 459.

In accordance with Regulatory Guide RG126 and Section 912B of the Corporations Act 2001, Argon Capital has Professional Indemnity Insurance in place which covers the work done for it by its representatives and employees.

Retain this document for your reference and any future dealings with Argon Capital.

## PRIVACY POLICY

We respect your personal details.

Argon Capital's commitment to protecting your privacy means that, amongst other things, in the process of collection, storage, accuracy, use and disclosure of your personal information, your privacy is respected.

Argon is bound by the Australian Privacy Principles under the Privacy Act. This policy explains how we treat information that we hold about you. It sets out the types of information we collect, how we may use that information and who we allow to access it. In addition to this policy, we will on occasions provide you with specific notice about how we use particular information that we collect from you. The Privacy Act relates only to information about individuals.

Generally we will not disclose personal information collected about you otherwise than for the purposes set out in this Policy, for a purpose you would reasonably expect, a purpose required by law, or a purpose otherwise disclosed to, or authorised by you. We may, in connection with particular services we offer you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in the privacy policy.

In the event of any inconsistency between the provisions of this privacy policy and those additional materials, the provisions of the additional materials will apply.

### Use or disclosure of your personal information

We collect your personal information to perform our various functions and activities in the provision of financial services to you. We also collect your personal information where the law requires us to.

Generally that information is provided to us directly by you (account opening document for example) but occasionally the information is sourced from a third party such as a Margin Lender or Cash Management Account provider.

We will not use or disclose information collected about you other than for a purpose made known to you, a purpose you would reasonably expect, a purpose required or permitted by or under law or a purpose otherwise authorised by you.

We may use or disclose your personal information for numerous purposes which include:

- Your application for a product or service.
- To enable us to provide you with a product or service or to bring to your attention other products and services which we believe may be suited to your needs.
- To address any complaints or concerns you raise with us.
- To investigate any suspicious or fraudulent activity on your accounts with us and third party providers.
- To manage and administer your accounts with us.
- To establish your tax status under any Australian or foreign legislation or treaty pursuant to an agreement with any tax authority.
- As required by the relevant laws, regulations and codes of practice.

You authorise us to disclose necessary information to related companies and to any agents or contractors who provide services to us in connection with the provision of services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose in which we supply to them.

If at some point in time we wish to use your personal information in a way that is not related to the purpose for which we collected the information (e.g. providing end of year tax information to your accountant), we will seek your express consent before doing so.

### Security

When we have received your information, we will take all reasonable steps to protect the personal information we hold from misuse and loss from unauthorised access, modification or disclosure.

We will take all reasonable steps to destroy or permanently deidentify personal information if it is no longer needed for any

purpose for which the information may be used and disclosed under this policy.

We also restrict access to your personal information to only those staff members who are properly authorised to have such access.

We do not retain records of client passwords or PINs in our systems, all records of these are held by ANZ/ETrade. We require you to keep such passwords and PINs confidential and secure to protect your personal information. You should contact us immediately if you believe your passwords or PINs are no longer secure.

### **Accessing my personal information**

You can contact us either in writing or by telephone to ascertain what personal information we hold about you. Where the request for information is complex we request that you write to us. In such circumstances we may require up to 30 days to respond to your request.

### **Complaints Process**

Argon Capital has a formal complaint handling policy. If you wish to make a complaint about a possible breach of privacy, you should contact our Privacy Officer by mail:

Argon Capital Pty Ltd  
PO Box 1039  
NORTH SYDNEY NSW 2059

Argon may change the information contained in this privacy policy from time to time. You should ensure that you have obtained the most recent version.