

St.George Directshares

Financial Services Guide (FSG)

1 November 2023

A service provided by CMC Markets Stockbroking Limited

AFSL No. 246381 and ABN 69 081 002 851



Directshares

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01. Who are we?

CMC Markets Stockbroking Limited is a member of the CMC Markets group of companies ('**CMC Markets Group**').

Our details are set out below. 'We', 'us', 'our' or 'CMC Markets Stockbroking' in this Financial Services Guide ('**FSG**') refers to CMC Markets Stockbroking Limited.

Capitalised terms used in this FSG that are not defined in this document have the same meaning as the defined terms in the St.George Directshares Terms and Conditions.

CMC Markets Stockbroking Ltd	
Registered & Business address	Level 20, Tower Three International Towers 300 Barangaroo Avenue Sydney NSW 2000 Australia
Postal address	Client Services St.George Directshares GPO Box 5351 Sydney NSW 2001
ABN	69 081 002 851
AFS Licence	246381
Phone	1300 133 500
Fax	+61 (0)2 9221 9365
Email	service@directshares.com.au
Web	directshares.com.au

02. Purpose and content of this FSG

This FSG is in respect of financial services provided to users of the St.George Directshares service. The Directshares service is provided by CMC Markets Stockbroking, at the request of St.George Bank – A Division of Westpac Banking Corporation (ABN 33 007 457 141).

This FSG is dated 1 November 2023. It is designed to assist you in deciding whether to use any of the financial services offered in this FSG. It aims to clearly define the role and responsibility of CMC Markets Stockbroking when it provides retail clients with the financial services described in this FSG.

In particular, this FSG contains information about:

- other documents that you may receive from us;
- how you may give us instructions;

- the kinds of financial services that we provide and the financial products to which those services relate;
- who we act for in providing financial services and what licensed markets and licensed clearing and settlement facilities we participate in;
- how we, our staff and other relevant persons are paid for the financial services offered as well as the associations or relationships between us and any related persons and issuers of financial products that might influence how we provide the financial services; and
- how complaints against us are dealt with.

03. Other documents that you may receive from us

If we offer to issue, or arrange the issue of a financial product to you, we will give you a Product Disclosure Statement ('**PDS**'). The purpose of the PDS is to provide information in respect of the product so that you can make an informed decision whether to acquire the financial product. The PDS contains information about the relevant terms significant benefits and risks, and the fees and costs associated with the provision of that financial product.

It is important for you to consider the St.George Directshares Terms and Conditions in deciding whether or not to acquire any of the financial products offered by us.

04. How to give us instructions

We accept instructions from you in person, by telephone, by facsimile, by post or electronically via our online trading platform. If you are not registered to trade electronically, we normally require a signature from you to verify your instructions.

05. Authorised financial services

We are authorised under our Australian Financial Services Licence to:

- deal in:
 - deposit and payment products, limited to basic deposit products;
 - derivatives;
 - foreign exchange contracts;
 - interests in managed investment schemes (excluding investor-directed portfolio services); and

- securities.
- provide financial advice in relation to the financial products listed above (although it is our policy not to give personal advice);
- make a market for foreign exchange contracts; and
- operate custodial or depository services other than investor-directed portfolio services.

5.1 What is general advice?

General advice may differ from what you might commonly understand or expect. General advice under Australian law can include information or our opinions about the market and products that we recommend to you.

Any information you have requested about the market, any products that we recommend, or any discussion you have with our employees in relation to any products, should only be regarded as general advice and will not take into account your objectives, financial situation or needs.

If you require personal advice specific to your particular financial situation, objectives or needs, you will need to speak to your financial adviser. Our policy is to not give personal advice.

Any discussions with our employees about their view of current or future market conditions or prospects for a particular product should not be seen as personal advice. Rather, it should be regarded as general information for your consideration prior to making any decision in relation to the financial services we provide.

5.2 What is personal advice?

Personal advice is advice that takes into account any of your objectives, financial situation or needs. We will not give you personal advice. Should you require personal advice please contact your financial adviser.

06. Who will be providing financial services?

6.1 What financial services do we provide?

Except where a service or product is provided by a third party at our request, we act on our own behalf when we provide financial services to you and not as an agent or representative for anyone else.

We are:

- a market participant of the Australian Securities Exchange Limited ('**ASX**');

- a market participant of the Sydney Stock Exchange Limited ('**SSX**');
- a market participant of Cboe Australia Pty Ltd (previously known as Chi-X Australia Pty Ltd) ('**Cboe**');
- a clearing participant of ASX Clear Pty Limited (the clearing and settlement facility for the derivatives markets operated by ASX);
- a participant of CHESS, the clearing and settlement facility operated by ASX Settlement Pty Limited; and
- a member of the CMC Markets group of companies.

We use the custodian services provided by CMC Markets Stockbroking Nominees Pty Ltd ('**CMC Markets Stockbroking Nominees**') ACN 081 424 375, a wholly owned subsidiary of CMC Markets Stockbroking, during the T+2 settlement period in accordance with the ASIC Market Integrity Rules (**Securities Market**) 2017 ('**ASIC Rules**'). The ASIC Rules require that all financial products being held for a client during this period be registered under a nominee company. CMC Markets Stockbroking Nominees holds these financial products on your behalf in accordance with the ASIC Rules. These services are conducted under our licence and we are responsible for the conduct of CMC Markets Stockbroking Nominees in respect of those services.

6.2 Our Privacy Statement

All information that CMC Markets Group collects about you will be treated in accordance with our Privacy Statement which can be found online at **Directshares.com.au**.

Our Privacy Statement is in accordance with the Australian Privacy Principles.

07. Remuneration and other benefits we receive

7.1 Brokerage

We receive brokerage, ongoing commissions, fees and charges for transactions conducted on trading accounts. The level of brokerage differs between listed products and exchange traded options. Set out below is a table which shows our brokerage rates. In addition to the fees set out in this section 07, we may charge a fee of up to \$3.85 (including GST), for the printing and postage of trade confirmations where you have the ability to receive electronic trade confirmations but have chosen not to do so.

Unless otherwise stated, all fees, charges, commissions and benefits disclosed in this FSG are exclusive of GST.

Australian listed products

Online orders

Brokerage fee/rate (including GST)*		
Trade Value	1st order placed ^ in the calendar month	2nd & subsequent orders placed ^ in the calendar month
Up to \$5,000	\$19.95	\$19.95
\$5,001–\$10,000	\$24.45	\$19.95
\$10,001–\$18,000	\$29.95	\$19.95
\$18,001–\$28,000	\$29.95	Greater of \$19.95 or 0.11% of the trade value
Over \$28,000	0.11% of the trade value	0.11% of the trade value

*Brokerage is the greater of the dollar value or the percentage amount shown

^ If the first order placed in the month does not result in the first trade or does not result in a trade, CMC Markets Stockbroking reserves the right to apply an adjustment to the brokerage fee/rate for the first order, being the difference between the brokerage fee/rate applicable to the 1st order and 2nd and subsequent orders.

Trades placed through the St. George Directshares online trading platform will be charged the applicable rate shown above at the time the order is placed.

ASX & Cboe Telephone orders

Trade value	Brokerage fee/rate (including GST)
Up to \$15,000	\$69.95
\$15,001–\$55,000	0.40% of the trade value
\$55,001–\$1,000,000	0.35% of the trade value
Over \$1,000,000	0.13% of the trade value

SSX Telephone orders

Trade value	Brokerage fee/rate (including GST)
\$0–\$20,000	\$66.00

\$20,001–\$37,500	\$90.75
Over \$37,500	0.22% of the trade value

Estate sale

Trade value	Brokerage fee/rate (including GST)
\$0–\$25,000	\$82.50
Over \$25,000	0.33%

Exchange traded options Online orders

Premium	Brokerage fee/rate (including GST)
All	Greater of \$34.95 or 0.33% of trade value
Exercise or Assignment of Equity Options	\$19.95 or 0.11% of trade value

Exchange traded options Telephone orders

Premium	Brokerage fee/rate (including GST)
Executed Single-Leg option order under \$8000	\$44
Executed Single-Leg option order over \$8000	0.55% of trade value

Unlisted managed funds (mFunds)

Value of funds	Brokerage fee/rate (including GST)
All	The greater of \$29.95 or 0.11% of the transaction value

We charge you the following rate when trading International Securities:

Global Share Service

Trade value	Brokerage*
All	The greater of \$59 or 0.59% of the trade value

* Brokerage on international trades is exempt from GST

Where any amount of remuneration (including commission) or other benefits referred to in this

section 07 is not able to be ascertained as at the date of this FSG, you may contact us to request particulars of the remuneration (including commission) or other benefits. Your request for particulars must be made within a reasonable time after you receive this FSG and before we provide you with any of the financial services referred to in this FSG.

7.2 Commissions and fees on investments in financial products issued by others

We are remunerated through the commission and fees we charge you. With certain financial products, we are also remunerated by product issuers through commissions and fees paid to us.

Initial commissions are a one-off payment and are calculated as a percentage of the funds you have invested. They are deducted from the amount invested. Initial commissions range from 0% to 6.5% (including GST) of your investment amount.

In certain cases where you apply for securities in a new issue, Initial Public Offering (IPO) or float we may receive fees from the issuer. All such fees associated with the issue will be disclosed in the product disclosure statement or prospectus for the issue. These fees vary but will typically range from between 1% to 5% of the amount raised. Unless otherwise agreed by us in advance you are not entitled to any of these fees.

Ongoing commissions (also known as trailing commission) are paid for the length of time you hold the financial product. They are usually paid directly to us by the product issuer out of the revenue the product issuer earns. In some cases they may be deducted from your investment. Ongoing commissions range from 0% to 3% (including GST) per annum of your investment amount.

7.3 Other fees and charges

Miscellaneous fees and charges on Australian listed products

Service	Fees & Charges (Including GST)
International transfers (telegraphic)	\$37
RTGS* (domestic)	\$35
Deceased estates share transfer	\$55 per stock
Change of trustee off market	\$110 for portfolio

Off Market Transfer	\$55 per stock
SRN requests to share registries	\$22 per holding (minimum)#
Fail fee	\$55 + ASX fee [^] per failed day
Late settlement fee	\$55 + 0.1% of value of shares traded per failed day
Postage of trade confirmation	\$3.85 per trade confirmation
Emailed trade confirmation	No charge
CHESS statement reprints	\$16.50
IPO/Placement booking fee	\$55 per stock
Rebooking fee	\$27.50
BPAY® for corporate actions	\$10
SMS trade confirmation	\$0.33 per trade confirmation
Algorithmic trading fee (in addition to any brokerage charged)	0.033% of the traded value

Note: We reserve the right to pass on any other fee incurred by us in respect of client activities.

[^] 0.11% up to \$5,000, or \$110.

*Real Time Gross Settlement

Minimum fee. CMC Markets Stockbroking will charge more for this fee where the fee charged to it by the exchange exceeds this amount.

Miscellaneous fees and charges on International Shares

Service	Fees & Charges (Including GST where applicable)
Electronic transfer (in)	\$20 per share
Transfer (out)	\$100 per share
Custody Fee	0.50% p.a.*, minimum \$10
Currency Conversion	An indicative FX Rate [^] will be displayed at the

	time of placing the order on the order ticket
FX spread	Up to 0.60% of the FX Rate [^]
Exchange trading fees & taxes (including Stamp Duty)	Displayed on the order ticket if applicable
Algorithmic trading fee (in addition to any brokerage charged)	0.033% of the traded value

* Applied monthly based on foreign asset holdings value excluding cash. This fee may be waived if client has placed a trade on International Securities in the previous 12 months. Charged Monthly.

[^] FX Rate – we will convert currencies at the time of execution based on the best available bid/offer exchange quoted by our chosen FX transfer agent.

Market Data Service

We are charged royalty fees by the ASX, Cboe and other international markets for the market data you use. We offer various market data subscriptions and you can nominate within the platform which data service you would like to have access to. You can change your data service at any time using the online trading platform however any downgrades will only take effect for the next calendar month and you will be charged for the current month.

Fees are payable in arrears and will be debited from your nominated account at the start of each month. The monthly data service fees can be found in the table below. You must ensure that you have adequate funds in your nominated account to cover the market data fees. If there are insufficient funds in your nominated account, you may, at our discretion, be switched to the delayed data service for future periods and you will need to settle the debt by making payment. We reserve the right to withhold funds from future share sale proceeds to settle any debt.

If you do not log on to the trading platform during a calendar month, no fee will be payable regardless of which market data service you have chosen.

ASX Data & News Service Fees

Data Service	Data Type	Monthly fees & charges (Including GST)
Dynamic Data Service	Live–refreshes automatically	\$41.25 for non-professional investors \$125.40 for professional investors

Live–requires a click to refresh	Live–requires a click to refresh	Free for non-professional investors \$125.40 for professional investors
ASX ComNews	Live–refreshes automatically	Free for non-professional investors \$46.75 – for professional investors

Cboe Market Data Service Fees

You will need to contact our Client Services team to activate Cboe market data subscription. We may at our sole discretion waive any Cboe market data fee at the point of subscription activation.

Data Service	Data Type	Monthly fees & charges (including GST)
Dynamic Data Service*	Live–refreshes automatically	\$11
Live–requires a click to refresh	Live–requires a click to refresh	\$11

* Only available when also subscribed to ASX Dynamic Data Services

International Data Service Fees

If you activate certain International Market data subscriptions you may be required to pay a market data fee.

Data Type	Monthly fees & charges (Including GST)
Live	US - \$11
	NZ - \$11
Delayed	All markets – Free

Platform Fees

Platform	Monthly fees & charges (Including GST)
Standard online trading platform	Free
Pro platform* (includes dynamic data for non-professional investors)	\$49.00

* Trade 5 times or more in a calendar month and the Pro Platform fee will be waived. If you do not logon to the Pro Platform during a calendar month, the Pro platform fee will not be charged.

Fees applied in arrears per calendar month.

Tax Tools

If available to you, subscriptions to Tax Tools Plus and Premium attract the following fees:

Tax Tools	Where you pay quarterly	Where you pay annually
Plus	\$29	\$99
Premium	\$139	\$479

7.4 Interest on CMC Markets Stockbroking Trust Account

We hold your money in a CMC Markets Stockbroking Trust Account or with ASX Clear (for exchange traded options margins) in certain circumstances in accordance with the Corporations Act 2001 (Cth) ('**Corporations Act**'). We may receive, derive and retain any interest or income generated from this CMC Markets Stockbroking Trust Account.

7.5 What benefits may we receive?

We may receive commission from third parties where a Directshares client utilises the third party's product in connection with their trading with us. We may also pay commission to third parties where a product or service of the third party is used in connection with a trading account.

7.6 Changes to fees

All fees, costs and charges and other amounts payable are correct as at the date of the FSG but are subject to change from time to time.

08. CMC Markets' Group representatives

8.1 How do we provide our financial services in relation to our products?

We provide our financial services to you through our employees.

8.2 How are CMC Markets' Group, employees and directors paid?

CMC Markets Group's employees, representatives and directors are remunerated by way of salary and other employee benefits.

A discretionary cash bonus may be paid to employees and directors as part of their remuneration, based on their performance, the performance of their business unit and/ or the performance of CMC Markets Group as a whole.

You can request further information regarding remuneration, commission and other benefits received by CMC Markets Group employees and directors by contacting our Compliance Department. Your request, however, must be made within a reasonable time after you are given this FSG and before any financial service identified in this FSG is provided to you.

09. Complaints

9.1 What can I do if I have a complaint about CMC Markets' financial service?

We are committed to providing a high standard of service to clients. If you have a query about the quality or level of service, or if we have failed to meet your expectations, we would like the opportunity to investigate and promptly rectify this for you.

Internal Dispute Resolution

You can make a complaint verbally by calling us or write to us via email or post using the details provided below. You may also appoint a representative to lodge a complaint with us on your behalf.

Complaints Officer

Phone: 1300 133 500

Email: service@directshares.com.au

Mail: GPO Box 5351
Sydney NSW 2001

If your concerns are unable to be resolved at the first point of contact, a complaint will be raised on your behalf to our dedicated in-house complaints team for further investigation. Additional information and/or

supporting documents may be requested to support your complaint.

Upon receipt of all required supporting documents, our complaints team will conduct a thorough investigation and once completed a detailed written final response will be provided to you.

We aim to resolve most issues within 21 days of receiving the complaint. However, some matters are more complex and can take longer to resolve. If that is the case, we'll keep you informed of our progress, including reasons for the delay.

We will respond to any communication, complaint, claim or dispute in English. Any translation or language assistance provided shall be for convenience only and to the extent there is a conflict between the English version and any translation, the English version shall prevail.

External Dispute Resolution

AFCA

CMC Markets Stockbroking is a member of an external dispute resolution scheme operated by the Australian Financial Complaints Authority ('**AFCA**'). If you are not satisfied with the final response issued by CMC Markets Stockbroking, you may refer the matter to AFCA within 2 years of the date of the final response. AFCA provides fair and independent financial services complaint resolution that is free to all consumers.

Mail: Australian Financial Complaints Authority
GPO Box 3 Melbourne
VIC 3001 Australia

Phone: 1800 931 678

Email: info@afca.org.au

Website: afca.org.au

ASIC

You may also choose to refer the matter to the Australian Securities and Investments Commission ('**ASIC**'). ASIC may be contacted on their freecall Infoline 1300 300 630.

Arbitration and Legal Proceedings

If the complaint does not fall within the rules of AFCA, you may request us to submit the complaint to arbitration.

If we agree to your request, the arbitration will be conducted in accordance with, and subject to, the

Institute of Arbitrators and Mediators of Australia Expedited Commercial Arbitration Rules. To the extent permitted under those rules, the Arbitrator will be a person recommended by the New South Wales Chapter of the Institute of Arbitrators and Mediators of Australia.

If we do not agree to your request, you may not submit the dispute to arbitration, although you may commence legal proceedings against us, in which case you agree to submit the dispute to the courts of New South Wales, Australia.

Governing Laws

To the maximum extent permitted by law, any dispute whatsoever raised by you in connection with the FSG, and St.George Directshares Terms and Conditions or other relevant documents ('**CMC Markets Documents**') and our products must be dealt with in Australia as described above. The CMC Markets Documents are governed by the laws of New South Wales, Australia.

9.2 What is the effect of a determination by AFCA or the arbitrator?

You and we agree to accept the determination of AFCA or the arbitrator, as the case requires, as final and binding and submit to the non-exclusive jurisdiction of the Courts in New South Wales for the enforcement of any such determination.

9.3 Records of phone conversations with our employees

We may record telephone conversations between you and our employees. Such recordings, or transcripts from such recordings, may be used as evidence in any dispute or anticipated dispute between us and you.

10. Professional Indemnity Insurance

We have professional indemnity insurance in place which satisfies the requirements for compensation arrangements pursuant to section 912B of the Corporations Act. This policy covers claims made against us in relation to professional services provided by our current and former employees.

**Level 20, Tower Three
International Towers
300 Barangaroo Avenue
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