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## IMPORTANT NOTICE

This document contains two Financial Services Guides (**FSGs**) issued by the relevant providers of the financial products and services on the eToro Trading Platform. The first FSG described the financial products and services provided by eToro Aus Capital Pty Ltd ACN 612 791 803 AFSL No. 491139. The second FSG is given by Gleneagle Asset Management Limited ABN 29 103 162 278 AFSL 238148 and its corporate authorised representative, eToro Australia Pty Ltd ABN 46 621 283 369 CAR No. 1281634, and described the products and services provided to you by both entities on the eToro Trading Platform. You should carefully read the information in both FSGs before deciding to invest on the eToro Trading Platform.

# eToro Aus Capital Pty Ltd

## FINANCIAL SERVICES GUIDE

### Purpose and content of this FSG

The financial services referred to in this financial services guide (**FSG**), prepared and dated 25 July 2018, are provided by eToro Aus Capital Pty Ltd (ACN 612 791 803; AFSL No. 491139) ("**eToro Australia**", "**we**" or "**us**").

This FSG has been designed to provide you with important information regarding our financial services to assist you in deciding whether to use any of these financial services.

This FSG contains the following important information:

- Information about eToro Australia and our contact details
- General information about the financial services and products we provide
- Any potential conflict of interest we may have
- How we deal with complaints about our services and products
- How we deal with your personal information
- Our fees and charges

### Information about eToro Australia

eToro Australia is an Australian incorporated company, licensed to provide financial services in OTC derivatives to retail clients and wholesale clients.

Further information about eToro is available on its website at [www.etero.com](http://www.etero.com).

eToro Australia is part of the eToro group of companies. None of the other companies in the eToro group guarantee or assure the performance by eToro Australia of its obligations to you.

### Contact details:

eToro Australia can be contacted at:

Level 33, Australia Square, 264 George Street,

Sydney NSW 2000

Telephone: +61 2 8016 9335

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

or through our website at [www.etero.com](http://www.etero.com).

### Our relationship with you

eToro Australia is responsible for the financial services we provide to you.

In the provision of the financial services to you, eToro Australia acts as principal in our transactions with you.

eToro Australia is responsible for the financial services it provides to you through our employees.

eToro Australia may also arrange for you to be supplied with financial services and products issued by non-related product providers. eToro Australia may receive a fee or commission payment from these non-related issuers or providers as a result of you investing in one of their products or services.

### **Financial services we are authorised to provide**

Under its AFSL, eToro Australia is authorised to carry on financial services business:

(a) to provide general financial product advice for the following classes of financial products:

- (i) derivatives; and
- (ii) foreign exchange contracts;

(b) to deal in a financial product by:

(i) issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products:

- (A) derivatives; and
- (B) foreign exchange contracts; and

(ii) applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:

- (A) derivatives; and
- (B) foreign exchange contracts; and

(c) to make a market for the following financial products:

- (i) foreign exchange contracts; and
- (ii) derivatives;

to retail and wholesale clients.

### **General advice only**

eToro Australia only provides **general** (not personal) financial product advice which means that we do not take into consideration your personal financial needs, objectives and financial circumstances.

Under the law regulating provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether generally or for a class or kind of investor, without taking into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions). Such general advice is provided without any expressed or implied recommendation that it is appropriate for you in light of your personal circumstances. You should be aware that general advice or information is not complete and it might lose currency or accuracy.

Regular updates, marketing materials, research reports, market reports, case scenarios, investment strategy reports, PDSs or other offer documents and website content are not personal advice.

We assess you for suitability for our CFDs. We or our affiliates might assess you for suitability for ancillary services or trading tools, such as CopyTrading. These suitability assessments are for initial risk and compliance management only, and may not be taken as representing, inferring or implying any duty of care or fiduciary duty, or that the financial products and financial services we provide to you are suitable for your personal financial needs, objectives and financial circumstances.

The onus is on you, as the client, to assess whether the services, products, information or general advice provided is appropriate for your personal needs, objectives and circumstances.

## **Other documents you may receive**

### **Product disclosure documents and Financial Product Terms**

YOU will receive from us a product disclosure statement (PDS) that makes disclosures about our contracts for differences (CFDs). The PDS contains important information to assist you in making a decision about the product. This should be read with the Financial Product Terms (made advisable when you apply or downloadable from our website). You must agree to them before transacting with us.

### **Affiliate's documents**

We arrange for you to use services from our affiliates. This is so you can access integrated services provided globally. The affiliates' services cover the trading platform, data feeds, social tools and trading tools such as CopyTrading. These are not financial services provided by eToro Australia and are arranged by us for you. Their respective terms of service (including any end user agreement) are downloadable from our website or free of charge on request.

## **Instructions and transacting**

You may only transact with our CFDs using the eToro trading platform.

In limited circumstances you can contact us by telephone, mail, or email. Please note that we do not accept any Orders by email, telephone or mail. Any instructions relating to change of details, withdrawals or transfers must be made through your account using our platform. For any instructions provided over the telephone, eToro Australia will acknowledge the instructions via email and confirmation will be required by you via return email.

## **Disclosure of conflicts of interests**

eToro Australia acts as principal when providing the financial services to you. eToro Australia does not act as your agent or broker.

eToro Australia is part of the eToro group of companies, which provides services globally. eToro Australia arranges for some services from its affiliates as part of an integrated global offering. Please note that only eToro Australia provides financial products and financial services to its clients. For those financial products and financial services It does not act as agent for any of its affiliates and you have no rights against those affiliates unless and to the extent they provide other services to you (such as the eToro trading platform). eToro Australia hedges all of its CFDs with a third parties. Accordingly, eToro Australia may be charged for hedge contracts and for services to it, and may pay amounts to its affiliates for that including wholly or partly based on your trading with eToro Australia.

eToro Australia directors and employees may hold or invest in any of the financial products that we issue to our clients.

eToro Australia may pay a fee or other benefit to other persons for introducing or for acting on behalf of clients, either by way of one-off fee, as a percentage of income generated by those clients referred to eToro Australia, or a combination of both. Those other persons may be obliged to disclose to you the fees or other benefits they receive.

eToro Australia has a policy for managing, avoiding (if appropriate) and disclosing relevant conflicts of interests, available on request.

## **Employees and representatives**

Our employees and other representatives are remunerated through a base salary and non-base salary compensation for their work for eToro Australia and related entities. The non-base salary includes a share of fees, revenue or other payments earned by eToro Australia (and, depending on the scope of their employment, related entities) which provides the financial product or service. The proportion of the employees' and other representatives' non-base compensation in aggregate ranges up to 75% of their overall compensation over time. Individual remuneration is based on their level of experience, length of service with eToro Australia or its related entities, the level of qualifications, their contributions and market conditions.

Our employees and other representatives may also benefit from various internal incentive schemes including seminars, conferences and training programmes and non-cash rewards. Participation in these schemes is generally based on revenue production, minimum length of service and compliance with group policies and industry regulations.

### **Professional indemnity insurance**

eToro Australia has the benefit of professional indemnity insurance that complies with section 912B of the Corporations Act 2001 (Commonwealth) (**Policy**). Subject to its terms, the Policy covers certain clients for loss or damage suffered as a result of breaches of the relevant obligations of eToro Australia and its employees in relation to its AFSL.

Also, subject to its terms, the Policy covers certain breaches by eToro Australia's employees and representatives employed by eToro Australia at the relevant time.

### **Disputes and complaints handling**

eToro Australia is committed to providing our clients with outstanding service. If you have a complaint about the financial product or service provided to you, please raise the issue with us by taking the following steps:

1. Contact our eToro Australia Dispute Resolution Officer and provide the details of your complaint. You may do this by telephone, email or letter.
2. If your complaint is not satisfactorily resolved, within three (3) Business Days of receipt of your initial complaint, please put your complaint in writing and send it to the Compliance Department at: eToro Australia Pty Ltd

Level 33, Australia Square, 264 George Street  
Sydney NSW 2000

or by email at [info@etoro.com.au](mailto:info@etoro.com.au)

eToro Australia will make every effort to try to resolve your complaint quickly and fairly. Complaints received in writing will be acknowledged within two (2) Business Days of written receipt of your complaint and we will use our best endeavours to try to resolve your complaint within 45 days of receipt of your written complaint.

3. If you are not satisfied with the final response provided by our Compliance Department, you may exercise your right to complain to the Australian Financial Complaints Authority Limited (AFCA) if your complaint is within its rules. AFCA is an external dispute resolution scheme. The contact details for AFCA are:

Australian Financial Complaints Authority Limited  
G.P.O. Box 3  
Melbourne VIC 3001  
Telephone: 1300 780 808  
Website: [www.afca.org.au](http://www.afca.org.au)

Please note that we will need to respond to your complaint prior to AFCA initiating any investigation into your complaint.

eToro Australia is a member of the AFCA complaints resolution scheme (No. 40378). The service provided to you by AFCA is free of charge.

The Australian Securities and Investments Commission (ASIC) also has an Info line on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

### **Privacy**

Your privacy is important to us and we are committed to compliance with the Privacy Act 1988 (Commonwealth). We maintain a record of your personal profile which includes your personal details and details of your objectives,

financial situation and needs. We also maintain records of any recommendations made to you.

We may disclose your personal information to external parties, such as our financial service providers, for the purposes of arranging or facilitating your investments or transactions. These external parties are committed to protecting your privacy. We may also collect, hold and use your personal information to undertake appropriate administration, including in relation to the “Know Your Client” obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Commonwealth) and its related regulations.

You can obtain a copy of our Privacy Policy by contacting us or visiting our website at: [www.etoro.com](http://www.etoro.com)

### **How we are remunerated**

We are mainly remunerated by the fees, costs and charges for our CFDs, which are disclosed in the PDS for those products.

### **Fees, charges and remuneration**

The fees, costs and charges for our CFDs are disclosed in the PDS for those products.

**\*\*\* END OF DOCUMENT \*\*\***

# **Financial Services Guide**

## **eToro Service**

eToro Australia Pty Ltd ABN 46 621 283 369  
Corporate Authorised Representative (No. 1281634) of Gleneagle Asset Management Limited

Gleneagle Asset Management Limited ABN 29 103 162 278  
Australian Financial Services Licence No. 238148

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## **DIRECTORY**

If you have any queries about this FSG or the services provided, you can contact eToro Australia Pty Ltd ABN 46 621 283 369 (Corporate Authorised Representative (No. 1281634) of Gleneagle Asset Management Limited ) at:

Level 19, 9 Hunter Street, Sydney NSW 2000

Telephone: 1800 778 439

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

Website: [www.etoro.com](http://www.etoro.com).

Gleneagle Asset Management Limited ACN 103 162 278 AFSL 226199 at:

### **Sydney Office:**

Level 27, 25 Bligh Street  
Sydney NSW 2000  
AUSTRALIA

## THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) was prepared and issued on 7 May 2020 by:

Gleneagle Asset Management Limited ABN 29 103 162 278 Australian Financial Services Licence (AFSL) Number 238148 (**Gleneagle Asset Management**).

It describes the financial services provided by its Corporate Authorised Representative, eToro Australia Pty Ltd ABN 46 621 283 369 (Corporate Authorised Representative. No. 1281634) (**eToro Australia**) in relation to eToro Service (ARSN 637 489 466) (**eToro Service**).

### WHAT IS THE PURPOSE OF THIS FINANCIAL SERVICES GUIDE?

The purpose of this FSG is to provide clients of Gleneagle Asset Management with information about the financial services that are provided by Gleneagle Asset Management by its representative, eToro Australia. It is designed to assist you in deciding whether to use the financial services described in this FSG.

### WHAT THIS FSG CONTAINS

This FSG contains information about:

- who provides the services and how the service provider can be contacted
- the services and types of products the service provider are authorised to provide
- how the service provider (and any other relevant parties) are remunerated
- internal and external dispute resolution procedures and how you can access them.

The FSG is issued in paper form and also as an electronic copy of this FSG (**Electronic FSG**). The Electronic FSG will be available via help section of the Platform or the website at [www.etoro.com](http://www.etoro.com). Potential investors should only rely on the information in this FSG for the services covered by this FSG. If this FSG has been received electronically, then a paper copy of this FSG will be provided free of charge on request by contacting eToro Australia using the contact details detailed in this FSG.

### WHO PROVIDES THE SERVICE?

Gleneagle Asset Management is the responsible entity of eToro Service which is a registered managed investment scheme (ARSN 637 489 466). Gleneagle Asset Management acts for itself.

eToro Australia has been appointed by Gleneagle Asset Management as the customer relationship manager for eToro Service. eToro Australia acts as the authorised representative of Gleneagle Asset Management when it provides to you the services described in this FSG.

### WHAT OTHER DOCUMENT MIGHT BE GIVEN TO YOU?

You should receive a Product Disclosure Statement (**PDS**) issued by Gleneagle Asset Management for eToro Service. That discloses important information about investing in eToro Service.

The disclosure documents will be issued in paper form and also as an electronic Product Disclosure Statement (**Electronic PDS**). The Electronic PDS will be available help section of the Platform or the website at [www.etoro.com](http://www.etoro.com). Potential investors should only rely on the information in the PDS for information about investing in eToro Service. If the PDS have been received electronically, then a paper

copy of the PDS will be provided free of charge on request by contacting eToro Australia using the contact details detailed in this FSG.

### **WHAT ARE THE FINANCIAL SERVICES PROVIDED?**

Gleneagle Asset Management is authorised by its AFSL to provide a range of financial services. For the purposes of this FSG, the services provided by eToro Australia as corporate authorised representative of Gleneagle Asset Management are limited to:

- providing general financial product advice only; and
- dealing in a financial product by applying for, acquiring, varying or disposing of a financial product on behalf of another person, with respect to interests in eToro Service, to retail clients and wholesale clients.

Neither Gleneagle Asset Management nor eToro Australia provides personal advice.

### **GENERAL ADVICE ONLY**

Any advice given by any representative of Gleneagle Asset Management or eToro Australia is general advice only.

Gleneagle Asset Management does not give personal advice of any kind and has not authorised anyone to give personal advice.

Under the law regulating provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether generally or for a class or kind of investor, without taking into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions) and any such general advice is provided without any express or implied recommendation that such advice is appropriate for you in light of your personal circumstances. Regular updates, marketing materials, research reports, market reports, PDSs and SPDSs or other offer documents and website content are not personal advice.

Gleneagle Asset Management and eToro Australia may collect personal or investment information from you to identify you, or for marketing purposes and to administer your account and our credit exposure to you. Collection of personal information is not to be implied that personal advice is given.

### **WHO IS RESPONSIBLE FOR THE FINANCIAL SERVICES PROVIDED?**

Both eToro Australia and Gleneagle Asset Management are responsible to you for any financial services which eToro Australia provides to you which are within the authority given to eToro Australia.

Gleneagle Asset Management is responsible for the conduct of its appointed representative, eToro Australia.

### **HOW CAN YOU CONTACT THE SERVICE PROVIDERS?**

All of your regular contact in relation to eToro Service should first be with eToro Australia. The contact details are given in the directory of this FSG.

If you have any complaints or queries about our service covered by this FSG, then you should follow the procedure described later in this FSG. (If you have any complaints or queries about the investments in eToro Service, then you should consult the PDS.)

You should give any instructions or communications to us or to eToro Australia by telephone, letter, and email or in person.

### **HOW THE SERVICE PROVIDER (AND ANY OTHER RELEVANT PARTIES) ARE REMUNERATED**

There are no fees, charges or costs for the services covered by this FSG.

Gleneagle Asset Management may receive fees, charges or recovery of expenses in its role as responsible entity of eToro Service, which are disclosed in the PDS.

eToro Australia does not charge or receive any fee for its services.

Gleneagle Asset Management and its associates have relationships with various parties whereby it pays fees or receives fees including on its personal account. These parties may include (but are not limited to) product issuers, brokers, custodians, fund managers, banks, investment advisors, financial planners and other referral sources.

Gleneagle Asset Management has a policy and documented processes for controlling, avoiding and disclosing relevant conflicts of interests for managing conflicts of interest that covers related party transactions and benefits or other remuneration from third parties.

Employees or authorised representatives of Gleneagle Asset Management or of eToro Australia respectively may be remunerated through a combination of base salary and non-base salary compensation.

The non-base salary may include a share of the commission, fees or other payments earned by the company (or an associate of it).

The proportion of commission, fees or other payments shared with the employee or other representative is based on their level of experience, length of service with the respective company or its associate, the level of qualifications and market conditions, and ranges from 0% up to 50%. Employees and other authorised representatives of those companies may also benefit from various internal incentive schemes including seminars, conferences and training programmes and non-cash rewards. Participation in these schemes is generally based on revenue production, minimum length of service and compliance with policies and industry regulations.

Since there are no fees charged for the services covered by this FSG, the remuneration and other benefits are funded from other sources, some of which may be fees, charges and costs disclosed in the PDS or SPDSs.

### **PROFESSIONAL INDEMNITY INSURANCE**

Gleneagle Asset Management has the benefit of professional indemnity insurance that complies with section 912B of the Corporations Act 2001. This professional indemnity insurance covers claims in relation to the conduct of current employees and past employees working for it and for its representatives.

## **HOW IS MY PERSONAL INFORMATION DEALT WITH?**

Your privacy is important to Gleneagle Asset Management and eToro Australia are committed to compliance with the Privacy Act 1998 (Commonwealth) and the National Privacy Principles. Gleneagle Asset Management maintains a record of your personal profile which includes your personal details and details of your investments.

Gleneagle Asset Management and eToro Australia may disclose your personal information to external parties, such as our financial service providers, for the purposes of arranging/facilitating your investments or transactions or with your consent.

Gleneagle Asset Management and eToro Australia may also collect, hold and use your personal information to undertake appropriate administration, including in relation to the "Know Your Client" obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Commonwealth) (AML/CTF Act).

If you wish to access information which Gleneagle Asset Management or eToro Australia hold about you, please first contact eToro Australia to request this. Gleneagle Asset Management will also try to assist you, if requested.

A copy of the Gleneagle Asset Management Privacy Policy is available from Gleneagle Asset Management. Please contact Gleneagle Asset Management if you have any concerns.

## **ANTI-MONEY LAUNDERING**

Gleneagle Asset Management has adopted a programme that complies with the AML/CTF Act. As part of this process, you will need to provide evidence of identification.

## **DISPUTE RESOLUTION**

Gleneagle Asset Management wants to know about any problems you may have with the service of Gleneagle Asset Management and eToro Australia so we can take steps to resolve the issue. If you have a complaint about the financial product or service provided to you, please take the following steps:

1. Contact Gleneagle Asset Management compliance division. You may do this by telephone, email or letter using the contact details below:

Gleneagle Asset Management Limited  
Compliance Division  
Level 27, 25 Bligh Street  
Sydney NSW 2000  
AUSTRALIA  
Phone: +61 2 8277 6655  
info@gleneagle.com.au

2. Gleneagle Asset Management will acknowledge the complaint immediately, or if not, as soon as practicable after receipt. Gleneagle Asset Management will endeavour to resolve any complaint and provide a final response as soon as practicable, but within 45 Business Days from receipt.
3. If you still do not get a satisfactory outcome, you have the right to complain to the Australian Financial Complaints Authority (AFCA). AFCA is an external complaints and dispute resolution body. The service to you is free. The contact details for AFCA are:

Australian Financial Complaints Authority  
G.P.O. Box 3, Melbourne  
VIC 3001  
Toll Free: 1800 931 678 (free call)  
Facsimile: +61 1800 931 678  
Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)

4. Gleneagle Asset Management - membership number 11357;
5. The Australian Securities and Investments Commission (ASIC) also has an Infoline on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

#### **RECORDING OF TELEPHONE CONVERSATIONS**

Each of Gleneagle Asset Management and eToro Australia may record conversations with you (with or without an audible tone). You may request a copy of the transcript of these recordings in anticipation of or in the event of a dispute. We may charge a reasonable administrative cost for providing this service.

**\*\*\* END OF DOCUMENT \*\*\***