



Gleneagle Investment Fund Financial Services Guide



SharePrices

Share Prices Diversified Investment Trust

Share Prices Funds Management Pty Ltd ACN 623 398 890
Corporate Authorised Representative (No. 1263287) of Gleneagle Asset Management Limited

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

CONTENTS

DIRECTORY	3
THIS FINANCIAL SERVICES GUIDE	4
<i>What is the purpose of this Financial Services Guide?</i>	4
<i>What this FSG contains</i>	4
<i>Who provides the service ?</i>	4
<i>What other document might be given to you?</i>	4
<i>What are the Financial Services provided?</i>	4
<i>General Advice only</i>	4
<i>Who is responsible for the Financial Services Provided?</i>	5
<i>How can you contact the service providers?</i>	5
<i>How the service provider (and any other relevant parties) are remunerated</i>	5
<i>Professional Indemnity Insurance</i>	5
<i>How is my personal information dealt with?</i>	5
<i>Anti-Money Laundering</i>	6
<i>Dispute resolution</i>	6
<i>Recording of Telephone Conversations</i>	6

DIRECTORY

If you have any queries about this FSG or the services provided, you can contact

CUSTOMER RELATIONSHIP MANAGER

Share Prices Funds Management Pty Ltd
ACN 623 398 890
Corporate Authorised Representative (No. 1263287)
Website: <https://shareprices.com.au>
Phone: 1300 123 345

RESPONSIBLE ENTITY

Gleneagle Asset Management Limited
ACN 103 162 278
AFSL 226199
Website: www.gleneagle.com.au

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 3 January 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, Share Prices Funds Management Pty Ltd ACN 623 398 890 (C.A.R. No. 1263287) (**Share Prices**) in relation to the Gleneagle Investment Fund ARSN 605 489 094, and the class known as Share Prices Diversified Investment Trust.

It describes the financial services provided by Gleneagle Asset Management in relation to Gleneagle Investment Fund, (ARSN 605 489 094), (**Fund**).

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, Share Prices. 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 <https://shareprices.com.au>. 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 Share Prices using the contact details detailed in this FSG.

WHO PROVIDES THE SERVICE?

Gleneagle Asset Management is the responsible entity of Fund which is a registered managed investment scheme (ARSN 605 489 094). Gleneagle Asset Management acts for itself.

Share Prices has been appointed by Gleneagle Asset Management as the customer relationship manager for Gleneagle Investment Fund, the class known as Share Prices Diversified Investment Trust. Share Prices 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 Fund. That discloses important information about investing in Fund. Each Strategy Portfolio is described in a Supplementary Disclosure Statement (SPDS) for that Strategy Portfolio. You also need to receive SPDS for the class known as Share Prices Diversified Investment Trust and all of the Strategy Portfolio SPDSs that you are considering investing in. Gleneagle Asset Management recommends that you read all available SPDSs and take advice on all of them before deciding whether to acquire, vary or dispose of your investments.

The current list of available Strategy Portfolios from which you can choose one or more Strategy Portfolios and the relevant SPDS for each of the Strategy Portfolios are available by contacting Share Prices, using the contact details detailed in the directory at the beginning of this PDS

The disclosure documents will be issued in paper form and also as an electronic Product Disclosure Statement and supplementary disclosure statements (**Electronic PDS and SPDS**). The Electronic PDS and SPDS for the class known as Share Prices Diversified Investment Trust, will be available via <https://shareprices.com.au>. Potential investors should only rely on the information in the PDS and SPDS for information about investing in Fund. If the PDS and SPDS have been received electronically, then a paper copy of the PDS and SPDS will be provided free of charge on request by contacting Share Prices 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 Share Prices 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 Fund, to retail clients and wholesale clients.

Neither Gleneagle Asset Management nor Share Prices does not provide personal advice.

GENERAL ADVICE ONLY

Any advice given by any representative of Gleneagle Asset Management or Share Prices 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 Share Prices 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 Share Prices and Gleneagle Asset Management are responsible to you for any financial services which Share Prices provides to you which are within the authority given to Share Prices.

Gleneagle Asset Management is responsible for the conduct of its appointed representative, Share Prices.

HOW CAN YOU CONTACT THE SERVICE PROVIDERS?

All of your regular contact in relation to Fund should be with Share Prices. 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 Fund, then you should consult the PDS.)

You should give any instructions or communications to us or to Share Prices 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 Fund, which are disclosed in the PDS.

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 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 Share Prices 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 Share Prices 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 Share Prices 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 Share Prices hold about you, please first contact Share Prices 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

Share Prices wants to know about any problems you may have with the service of Gleneagle Asset Management and Share Prices 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
Email: 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 Share Prices 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.