



FINANCIAL SERVICES GUIDE

1. About this document

This Financial Services Guide (FSG) is an important document. You should read it carefully and make sure you understand it.

This FSG is dated 4 April 2014 and is provided to you by Paradigm Securities Pty Ltd (Paradigm Securities, we, our, us) to inform you of the financial services we are able to provide and to assist you in deciding whether to use any of the services offered in this FSG. This FSG replaces all prior versions.

Paradigm Securities Pty Ltd (ACN: 159 611 060) is an Authorised Representative (AR No. 426970) of by Pulse Markets Pty Ltd A.C.N 081 505 268 which holds a current Australian Financial Services Licence No: 220383. Pulse Markets is responsible for the financial services provided to you and for the content and distribution of this FSG.

This FSG explains:

- other disclosure documents we may give you
- who we are and how you can contact us
- financial services and products we are authorised to provide
- how you can instruct us
- how we get paid (remuneration, commissions, benefits)
- how we deal with customer complaints and where you can go for further help
- our compensation arrangements
- potential conflicts of interest
- records we keep and privacy policy

This FSG contains general information only. If you have further questions after reading it please contact us.

2. Other Disclosure Documents we may give you

If you choose to use our services, you may receive a Statement of Advice and/or a Product Disclosure Statement or Prospectus. Paradigm Securities will provide clients with documentation to facilitate transactions including client agreements, terms and conditions and confirmation of the transaction.

Statement of Advice

If we give you personal advice (i.e. advice which has taken your personal circumstances into account), you may be issued with a Statement of Advice which sets out our advice, the reasoning that led to that advice based on your relevant personal circumstances that you have disclosed to us and any commissions, fees or other benefits or associations that are relevant to that advice.

You are entitled to receive a **Statement of Advice** (SOA) when we give you personal advice as a retail client. Personal advice is advice that takes into account your personal objectives, financial situation and needs. The SOA will set out the advice and will include information regarding the basis on which the advice was given, any fees or commissions received in providing the advice and a warning where the advice has been provided based on incomplete information. The SOA presents the advice and basis on which it was given.

Where you obtain regular advice from us, once we have provided you with an initial Statement of Advice a further Statement of Advice may not be provided each time we provide you with further advice so long as your circumstances and the basis of the advice are not significantly different to your circumstances at the time the initial advice was provided.

If advice is provided to you verbally, you may also request a copy of that advice. Your request may be made by telephone, facsimile, email or in person. If you wish to request a written copy of your advice you should do so within 90 days.



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Product Disclosure Statement

If we recommend a particular financial product to you, you may also receive a Product Disclosure Statement or Prospectus prepared by the financial product issuer which will set out all the necessary information you require to assist you to make an informed decision about the financial product.

Where we make a recommendation on a product (other than securities listed on the ASX) to a retail client, we will provide a **Product Disclosure Statement (PDS)** which will assist you in deciding whether to acquire the financial product. The PDS contains important information about the product features, benefits, risks and fees associated with that product. The PDS should be read carefully to enable you to make an informed decision about whether to utilise the product.

It is important that you give us accurate and complete information regarding your relevant personal circumstances such as your investment objectives, financial situation and needs, otherwise our advice may not be appropriate to all your circumstances.

Record of Advice

Where you obtain regular advice from us, once we have provided you with an initial Statement of Advice a further Statement of Advice may not be provided each time we provide you with further advice so long as your circumstances and the basis of the advice are not significantly different to your circumstances at the time the initial advice was provided. However, we are required to keep a record of any such advice we provide. You may request a copy of the **Record of Advice (ROA)** which we will keep for up to 7 years after the advice was given.

3. Who are we

Paradigm Securities Pty Ltd "**Paradigm Securities**" (ABN 95 159 611 060) operates as a Corporate Authorised Representative (CAR 426 970) of Pulse Markets Pty Ltd "**Pulse Markets**" (ACN 081 505 268; AFSL No 220383). Paradigm is responsible for the Financial Services described in this guide under Pulse Market's AFSL

Paradigm Securities is a financial services firm that provides trading services for financial products listed on licensed markets such as the ASX market. Paradigm Securities will also arrange for clients to access products issued by other Australian Financial Services Licensees as recommended from time to time, including margin lending and cash management trusts. Your investment advisor is a representative of, and acts on behalf of, Paradigm Securities.

By authorising Paradigm Securities as a Corporate Authorised Representative of Pulse Markets, Pulse Markets receives a service fee of a share of commissions. Pulse Markets provides access for Paradigm Securities clients to execution, clearing and settlement arrangements for financial products from Pershing Securities Australia Pty Ltd (Pershing)

4. Paradigm Securities Pty Ltd contact details

Contact	Paradigm Securities Pty Ltd	Barry Dawes
Address	Level 3, 7 Bridge Street Sydney NSW 2000	Phone: +612 9259 5000 Fax: +617 5655 5341
Email:	bdawes@paradigmsecurities.com.au	Website www.paradigmsecurities.com.au



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Pulse Markets Contact Details

Contact	Chief Executive Officer	Andrew Braund
Address	Level 3, 7 Bridge Street	Phone: +612 9191 0420
	Sydney NSW 2000 Australia	Fax: +617 5655 5341
Email:	info@pulsemarkets.com	Website: www.pulsemarkets.com.au

5. Financial Services we are authorised to provide

Pulse Markets has authorised us to:

- provide general and/or personal financial product advice and to deal (apply for, acquire, vary or dispose) in relation to:
 - deposit and payment products limited to basic and non basic deposit products
 - derivatives
 - superannuation
 - standard margin lending facilities
 - managed investment schemes including IDPS
 - securities

to retail and wholesale clients.

6. Nature of Advice and our Responsibilities

Please note that although we are authorised to do so, Paradigm Securities may not always provide you with personal advice. If we provide 'general advice' only to you, it is important to remember that this 'general advice' does not take account of your objectives, financial situation or needs. Therefore, we recommend that you take all reasonable steps to fully understand the outcomes of specific products and strategies adopted in relation to utilising the services provided by Paradigm Securities. Newsletters, Trade Alerts and research papers are example of general advice we may give you.

While Paradigm Securities believes the general financial product advice and information we provide is accurate and reliable, neither Paradigm Securities nor its officers and associates assume any responsibility for the accuracy and completeness or currency of that advice and information.

If arranged with your investment advisor, Paradigm Securities can provide limited personal advice, that is advice that is limited to a particular financial product range and/or based on limited relevant personal information. This may mean the advice and resulting investment may not be appropriate to your individual investment objectives and personal circumstances. You should make your own assessment of the appropriateness of any such advice. If we provide you with personal advice, you will receive a SOA. If we provide you with Further Advice, we will not give you a SOA but you can request a copy of the ROA up to 7 years after the advice.

a. Personal Financial Advice

For Paradigm Securities to give you appropriate personal financial advice, you will need to provide details of your personal objectives, current financial situation, needs and any other relevant information.



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You do not have to provide us with this information. If you choose not to provide this information, however, we may not be able to provide you with advice, or the advice you receive may be general in nature and may not be appropriate to your objectives, financial situation and needs. You should read the warnings provided in any document that we provide to you carefully in regard to any decision relating to a financial product.

We only provide personal advice to you where you use the services of one of our representatives. We will not give you personal advice in our regular updates or marketing material or when you visit our website. We maintain a record of your completed personal profile including details of your objectives, financial situation and needs.

We also maintain records of any recommendations made to you.

b. Limits on the Advice

It is important to understand that the advice your adviser provides may be limited because:

- you have only provided personal information
- you have sought scaled advice e.g. only in respect of securities
- your adviser has limited authorisation e.g. is not a tax agent
- your adviser is restricted to advising on products on our approved product list
- your adviser is restricted to dealing and advising on products permitted under our licence.

In formulating recommendations, your adviser may consider taxation, legal and estate planning implications. As we are not specialists in these areas, you should seek further advice, as relevant, from an appropriate specialist. If you want specific advice you should consult a specialist in that field.

If arranged with your client advisor, Paradigm Securities can provide limited personal advice that is advice that is limited to a particular financial product range and/or based on limited relevant personal information. This may mean the advice and resulting investment may not be appropriate to your individual investment objectives and personal circumstances. You should make your own assessment of the appropriateness of any such advice. If we provide you with personal advice, you will receive a SOA. If we provide you with Further Advice, we will not give you a SOA but you can request a copy of the ROA up to 7 years after the advice.

c. General Advice

While Paradigm Securities believes the general financial product advice and information we provide is accurate and reliable, Paradigm Securities will not assume any responsibility for the accuracy and completeness or currency of that advice and information.

7. Products we provide

Paradigm Securities may provide you with an execution-only service and/or may provide you with general or personal advice in relation to the authorised financial products. Paradigm Securities arranges for you to be supplied with financial services and products issued by non-related product providers. Paradigm Securities may receive a fee or commission payment from these non-related issuers as a result if you investing in one of their products or services. Any remuneration that Paradigm Securities may derive is included in the fees and commissions you pay as outlined under the heading "Remuneration".

Paradigm Securities can help you meet your financial objectives by providing a full range of financial services, including access to company research from our experienced research analysts. You will benefit from sound advice, prudent investment management and personal service from our investment Advisers.

Paradigm's services include access to:

- Buying and Selling Shares
- Online Internet Access To Your Portfolio



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- Derivatives (Options) Trading
- Margin Lending
- Initial Public Offerings (IPOs)
- Managed Funds
- Cash and Fixed Interest Products and Services
- Contracts For Difference

Buying and selling shares in Australia

Our Advisers have access to sophisticated information technology and research and are informed as changes occur. With the latest computer technology, we offer clients well executed transactions, supported by an efficient settlement service.

Buying and selling shares in global markets -International Equities

Through our arrangements with selected overseas brokers, you can buy and sell shares in the major stock markets of the world, including the United Kingdom, the United States of America, Europe, Asia and New Zealand. As the Australian Stock Exchange comprises only around 2% of all equities worldwide, trading on international markets can diversify your portfolio and provide you with additional investment opportunities.

Online internet access to your portfolio

With our online internet access service, you also have at your fingertips research-based information that you would expect from your Adviser online, 24 hours a day, seven days a week. You can check stock prices, access your portfolio and review your investment position whenever you choose.

Derivatives (Options) Trading

Exchange traded options are types of derivatives which can be used to: increase the yield on your portfolio; to protect your portfolio against a fall in the market; or to give you a leveraged entry into leading stocks. Our Derivatives Specialists will suggest suitable strategies to support your personal investment goals.

Margin Lending

A credit facility from an external margin lending provider allows investors to borrow against the security of a wide range of listed companies and managed funds. A margin lending facility allows you to negatively gear your investments, similar to gearing your property, or to borrow up to 70% against your existing portfolio of approved securities.

Initial Public Offerings (IPOs)

Paradigm Securities staff have experience in managing many new issues in Australia. This presents our clients with valuable opportunities to participate in IPOs that may not be offered to the general public. You can let us know if you would like to be advised of IPOs as they become available.

Managed Funds

We can advise you on a wide range of managed funds which offer you the opportunity to obtain greater portfolio diversification than you might otherwise achieve as a retail investor.

Cash and fixed interest products and services

To optimise your cash and fixed interest investments, we can advise you on an extensive range of financial products, including cash management accounts, term deposits, bank-accepted bills of exchange and company debentures, as well as Commonwealth and Semi-Government securities, corporate debt and convertible and unsecured notes.

Contracts For Difference

Contracts For Difference (CFDs) are a derivative product issued by third party providers. We can introduce you to these product issuers and provide advice and execution services. CFDs are traded on margin and give you exposure to the movement of underlying assets prices such as shares, currencies, indices or commodities. See 'Risks' later in this FSG for important information about CFDs.

8. How to instruct us

Before transacting you will need to have opened an account with our preferred third party service providers.

For shares and options trades, we have appointed market participants to provide execution and clearing services for:

- transactions in securities and other financial products executed through the ASX;



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- for transactions in all derivatives (such as Exchange Traded Options) executed through ASX;
- settlement services for transactions executed by, or on behalf of our clients; sponsorship services; and
- nominee and other custody services.

In the event that you require the above services to be provided, you will also need to become a client of our preferred service provider. Paradigm Securities will arrange for its clients to be provided with the service provider's FSG and other documents which provide further information about the services provided.

Please note that a PDS is not required for investments in securities. We have prepared a guide to investing securities and this is available on our website www.pulsemarkets.com.au or by contacting us directly. You should ensure that you understand the risks and procedures before investing in securities. You will receive your contract notes from the service provider. You should contact the service provider if you do not receive a contract note or if there are any discrepancies immediately. In arranging for a third party to provide these services to you, Paradigm Securities will act as your agent, not as the agent of the third party.

For Contracts For Difference, Paradigm Securities will arrange for its clients to be provided with the FSG, PDS and other disclosure and documents which provide further information about the services provided by our preferred third party product issuer. You will receive your daily statement from the product issuer. Paradigm Securities will act as your agent, not as the agent of the product issuer.

You can give instructions to us in any of the following ways:

- by the telephone (note your telephone calls to us may be recorded);
- in writing (including email or facsimile by prior arrangement only, note you must confirm with us that such instructions have in fact been received by us as electronic communications may fail or not be received in a timely manner); and
- electronically via direct entry into trading systems that we provide access to you.

For Margin Lending products, on specific request by the client, Paradigm Securities provides the disclosure documents and the application. Paradigm Securities makes no recommendation as to which is the best provider or whether the product is suitable for the client. Paradigm Securities advises clients that they should seek independent financial advice to determine whether margin lending product is suitable for their purposes and circumstances. Paradigm Securities will forward completed application forms to the product provider. Paradigm Securities receives a commission from the product provider. The product provider undertakes the assessment of client's income and liaises directly with the client on all subsequent events such as credit assessment, loan to valuation limits, margining etc. **Neither Pulse Markets or Paradigm Securities will notify the client of a margin call.**

For Wealth Management products, Paradigm Securities follows the steps below.

1. Gathering financial data - such as details of your income and expenses, goals and objectives etc.
2. Identify the relevant personal circumstances that you have disclosed and determine whether this is sufficient information to provide advice on the areas that you seek.
3. Conduct a reasonable investigation into the financial products that might achieve your objectives and meet your needs
4. Take any other step that would reasonably be regarded as being in your best interests
5. Preparing your Statement of Advice. This will identify recommended investments and will address your attitude to risk.
6. Implementing the advice.
7. Reviewing and revising your advice as to ensure it stays up-to-date and relevant to the economic climate and your changing lifestyle.



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Paradigm Securities will arrange for its clients to be provided with the Financial Services Guide, PDS and other disclosure documents which provide further information about the services provided by our preferred third party product issuer. You should also be aware that you are entitled to receive an SOA whenever we provide you with personal advice, which takes into account your objectives, financial situation and needs. This Statement of Advice will contain the advice, the basis on which it is given and information about fees, commissions, business relationships and associations which may have influenced the provision of the advice. If our representative provides further advice to you, and that further advice is related to the advice we have provided to you in a previous Statement of Advice and we do not give that further advice in writing you may request a copy of the record of that further advice at any time up to 7 years from the date our representative gave the further advice to you. You can request the record of the advice by contacting the representative or us in writing or by telephone or by email.

For financial products (other than securities), we must also provide you with a PDS containing information about the particular product, which will enable you to make an informed decision in relation to the acquisition of that product.

9. Remuneration

a. Transaction based fees

Paradigm Securities is remunerated through the fees and commissions that we charge you for executing transactions on your behalf. Fees and commissions charged to you will depend on the type of financial product being traded, the frequency of your trading activity, the type and level of service required and the size of your transaction. Rates are subject to negotiation prior to transacting any business. Fees and commissions, once disclosed and agreed, will be charged to your trading account when you buy and sell at the time your transaction is executed.

The brokerage rates below are the maximum that Paradigm Securities could charge and are provided as a guide. Please contact us for your most competitive rate.

Type of Product	Basis	Maximum fee
Securities and warrants	per transaction	Up to 2.75% (including GST) of the transaction value (whichever is greater) as agreed between the client. Our standard scale brokerage rates are about 1% of the total consideration on trades and subject to a minimum of \$100 (excluding GST).
Exchange traded options	per transaction	up to \$220 (including GST) per transaction of up to 40 options contracts and \$2.20 (including GST) per contract after that;
Contracts for Difference (CFDs)	Notional value of the transaction	up to 1.1% (including GST); typical fee is a flat rate fee of \$100 or 0.25% product issuer spreads may widen by up to 15 points either side

These rates are subject to change from time to time. Should there be a change in the fee structure, Paradigm Securities will notify you by email or post a notice to our website www.pulsemarkets.com.au. Goods and Services Tax (GST) may be levied on brokerage charged to Australian Residents. We recommend that you seek advice from a professional tax agent who can provide advice in relation to the tax deductibility of any fees that we charge. A detailed description of the fees, charges and commissions payable can be found in the Product Disclosure Statement for the relevant financial product.

If you request to trade via Direct Market Access (DMA), you may be charged royalties from IRESS. Please speak to your adviser for confirmation of costs and IRESS Terms and Conditions.



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b. Commissions, remuneration and other benefits received by Paradigm Securities

Paradigm Securities charges fees for the services and products provided. Where we provide you with personal advice, detailed information about fees, commissions or other benefits we may receive will be provided within your SoA, RoA or Advice Confirmation letter. These fees may be charged in various ways, including

- an advisory fee or ongoing service fee, e.g. initial fee, account fees, management fees (which include transaction, ongoing and, if applicable, any borrowing costs) and/or brokerage
- administration fees
- fees based on funds under management or advice.
- commissions for insurance products

More details in relation to your advice and the commissions paid will be disclosed in your SOA and/or by request.

Paradigm Securities may receive commissions from some product providers other than for insurance for some pre-existing arrangements.

We may receive remuneration from a product issuer in the form of upfront and trailing commissions. These fees or commissions are different for each product and will be disclosed in the relevant PDS. They will be disclosed to you if we have provided you with personal advice in relation to a particular product. As a guide, Paradigm Securities may receive:

Type of Product	Basis for calculation	Commission/Payment we may receive
Margin Lenders	Amount of facility	Ongoing commission can range from 0.25% to 1.5% p.a.
Cash Management Trusts	Daily balance of account	Ongoing commission can range from 0.25% to 1% p.a.
Fixed Interest	Transaction size	Ongoing commission can range from 0.25% to 1% p.a.
Managed Funds	Funds under management	Upfront commission can range from 0% to 10% Ongoing commission can range from 0% to 2.5% p.a.
New issues	Transaction size	Stamping fee can range from 3% to 6%

For the above Wealth Management transactions, a fee for service may be negotiated. An hourly rate of \$375 + GST upfront with ongoing combination of fees and trailing commission.

We may receive commission from fund management groups, margin lenders and product issuers when we place investments on your behalf. The exact amount may vary from 0% to 10% depending on the product, but usually this upfront commission may be approximately 5% of the amount you invest.

If your application for securities in a new issue, IPO or float is stamped by us and is successful, we may receive a lodgement fee from the product issuer. All fees associated with an issue will be disclosed in the Product Disclosure Statement or Prospectus. These fees may vary, but typically range from 3% to 6% of the amount raised. If we act as underwriter or sub-underwriter or facilitate a placement, we may receive fees for acting in that capacity. These fees typically range from 3% to 6% of the amount raised.

Any applicable remuneration or commissions will be disclosed in the Statement of Advice or, where a Statement of Advice is not required, at the time that the personal advice is given or as soon as practicable thereafter.

All monies that we hold on your behalf from time to time are deposited into our trust account. We will retain any interest should it be paid on that account.



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c. Miscellaneous fees and charges

Service	Fees and Charges (including GST)
Manual Bookings	\$11
STP Contract	\$27.50
Non- STP Contract	\$16.50
RTGS Payments	\$55
SRN Requests	\$22
Postage of confirmation contract note	\$5 per confirmation contract note
Initial fail fee charge	\$55
Dishonour fee	\$55
ASX levied fail fees	On charged

d. Interest on Client Segregated Account

We may receive interest on credit balances of the Client Segregated Account and Paradigm Securities will retain any such interest received.

e. Commissions, remuneration and other benefits paid by Paradigm Securities

You may have been referred to us by a service provider who may receive financial or non-financial benefits from us. These should be disclosed to you by the service provider in question. Please note that such benefits will not impact transaction fees or the rates you will be offered for financial products or services undertaken with Pulse Markets.

f. Soft dollar benefits

Paradigm Securities from time to time receive a benefit from preferred product providers including educational seminars, conferences, and training days. Details of benefits above \$300 received by us will be maintained on a register.

g. How do we get paid?

As a Corporate Authorised Representative of Pulse Markets, your Paradigm Securities Client Adviser may receive up to 55% of the brokerage, fees charged or commissions placed by Paradigm Securities on your behalf and may be entitled to receive bonuses on achieving specified revenue targets. Where your adviser representative would become entitled to a bonus as a result of services provided to you, that payment (including any nonmonetary benefit) will be disclosed verbally or in a Statement of Advice.

Referral arrangements

Where you have been referred to us by a third party such as an accountant, financial planner or other professional, we may pay a referral fee to them consisting of a proportion of the fees earned by us in relation to your dealings with Paradigm Securities. The fee paid in respect of the referral depends on the particular circumstances of the arrangement with the third party and may be up to 100% of our charges. Please refer to the Financial Services Guide or Statement of Advice of the third party for more detailed information on any applicable payments. Any such fee is paid out of the fees received by Paradigm Securities and is not an additional charge.



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10. Complaints Resolution

We take every step to ensure we provide you with quality service. The AFSL holder Pulse Markets has an internal dispute resolution policy in place to resolve any complaints or concerns you may have about the service provided to you. These should be directed to the Complaints Officer (by telephone, facsimile, or letter) at the address on the first page of this FSG, or by email complaints@pulsemarkets.com.au.

We will provide you with acknowledgement of written complaints within 2 business days, and seek to resolve and respond to your complaint within 30 days of receipt. We will investigate your complaint, and provide you with our decision, and the reasons for which it is based in writing. We will endeavour to resolve your complaint quickly and fairly.

If the complaint cannot be resolved to your satisfaction within 45 days and you wish to proceed further, you may lodge a complaint with the Financials Ombudsman Service (FOS) via the following means:

Financial Ombudsman Service

GPO Box 3, Melbourne Vic 3001

Toll Free Telephone: 1300 78 08 08

Fax: (03) 9613 6399

Email: info@fos.org.au

Website: www.fos.org.au

You may also contact Australian Securities and Investments Commission (ASIC) freecall Infoline on 1300 300 630 to make a complaint and obtain information about your rights.

11. Compensation arrangements

The AFSL holder Pulse Markets holds Professional Indemnity Insurance cover for the activities conducted under its AFS licence. The policy provides coverage in the aggregate of up to \$2,500,000 with an excess of \$25,000 to cover claims regarding professional indemnity, directors and officers liability, crime (fraud) and the conduct of representatives/employees who no longer work for us (but who did at the time of the relevant conduct). The Pulse Markets Professional Indemnity insurance cover is subject to the policy terms and conditions; however the cover satisfies the requirements of s. 912B of the Corporations Act.

12. Conflicts of interest

Paradigm Securities, Pulse Markets, nor any of its related bodies corporate, nor any of our authorised representatives, have any ownership links with any financial product issuer that could be expected to influence us.

Conflicts of interest may occur from time to time. You have the right to be advised of any material interest that could reasonably be expected to be capable of influencing the recommendation of a financial product to you.

Accordingly, you should be aware that:

- Paradigm Securities is remunerated wholly or in part on a share of brokerage or commission basis
- if you have been referred to us by a third party, that person may receive a share of brokerage charged to you
- Paradigm Securities may have material interests in companies from time to time. These may be companies we have raised capital for, provided advice to or produced research on.

Should a conflict occur, you will be advised either verbally by your Client Advisor or this will be outlined in a SOA or ROA. Should you have any concerns or would like to discuss this matter further please contact us.

13. Risks



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We will explain to you significant risks relating to financial products and financial services which we recommend to you. If you feel that we have not done so to your satisfaction you should ask us to further explain those risks to you.

Our advice may include financial products that trade on live and volatile markets which, like other investments such as real estate, can fall in value (resulting in a capital loss) as well as appreciate in value. The recommendations made to you are made with reference to current market conditions and your current circumstances as you have disclosed them to us, and either or both may change significantly without notice. As a result the advice may not be appropriate if taken at a different point in time.

If 30 days has expired since the provision of our advice, we recommend that you contact your representative to ensure that the advice is still appropriate. In general the value of financial products may be affected by the following factors. (Please note that this list is not exhaustive).

- Overall market risks - for example, movements in the share, real estate and bond markets can be caused by political, economic, taxation or legislative factors; e.g. changes in interest rates, taxation laws, superannuation laws etc.
- Domestic and International Factors - vulnerability to international events or market factors, including movements in exchange rates, changes in trade or tariff policies.
- Sector specific factors - for example, in relation to a company's securities, the demand for a company's product, commodity prices, the economic cycle of industry, changes in consumer demands and changes in technology.
- Financial product specific factors - for example, in relation to a company's securities, these may include the company's directors, the strength of management, the significance of any movement in key personnel, profit history, tangible asset base, debt level and fixed cost structure, litigation, profits or losses on particular contracts, drill results and competition. Also, whether the company already has a profitable business, is exploring for recoverable resources, or is developing a new product.
- Contracts For Difference (CFDs) are speculative products, the geared nature of which places a significantly greater risk on your initial investment than non-geared investment strategies such as conventional share trading. You may incur losses that are greater than your initial investment and the money you deposit into your account.

These factors and more are taken into consideration when your Representative is making investment decisions on your behalf.

14. The Use of Research Reports

At Paradigm Securities we are proud of the depth of research we can offer. However, even the very best research does not guarantee the securities will perform according to the assessment of the analyst. The results of any research are the opinions of specialist analysts. These opinions can never be guaranteed, are only valid for a limited time, and are often subject to market movements.

Our research reports do not take into account your investment objectives, financial situation or needs and should be regarded as general advice only. You should always consult your Adviser before acting on any research report so your particular circumstances may be taken into account. For example, for short term investors, a research report containing a 'buy' classification could turn into a 'sell' classification where the market price of a security appreciates by even a small amount. However, for the prospective longer term investor, this market movement may not be significant, although a larger movement might be. The mere fact that a security is categorised by an analyst as a 'buy' does not necessarily mean that the security is a suitable investment for you personally.

15. Record keeping and Privacy

We will maintain complete records of the services we provide to you in accordance with Australian Laws. As a financial services provider, we have an obligation under the Anti Money Laundering and Counter Terrorism Financing Act to verify your identity, amongst other things. If we are unable to collect all information requested in the account opening process or requested during the subsequent services, we may be unable to provide or continue to provide services. We will also retain copies of this information.

We also keep a record of personal information you provide to us. Your privacy is important to us and we are committed to compliance with the Privacy Act and Australian Privacy Principles. We maintain a record of your



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personal profile which includes your personal details and the 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 services providers, for the purposes of arranging your investments or transactions. Such external parties are required and committed to protecting your privacy.

Telephone calls with us may be recorded to allow for a record to be kept of orders taken and to ensure that our service standards are met.

If you wish to access information we hold about you or have any concerns, please contact us. A copy of our privacy policy is available from us or our website www.pulsemarkets.com.au

16. Distribution

The distribution of this Financial Services Guide by Paradigm Securities has been authorised by Pulse Markets.