

Pengana Capital Limited
ABN: 30 103 800 568
AFSL No: 226566
Date Prepared: 25 March 2024

FINANCIAL SERVICES GUIDE

What is the purpose of this Financial Services Guide (“FSG”)?

This FSG is an important document that tells you about the services and products that Pengana Capital Limited (“**Pengana**”, “**we**”, “**us**”, or “**our**”) is authorised to provide to you under our Australian Financial Services Licence (“**AFSL**”). This FSG is provided to assist you to determine whether to use the financial services described in this FSG.

This FSG contains important information about:

- the financial services we offer;
- the financial products to which those services relate;
- who we are;
- potential conflicts of interest;
- how we and others are paid in connection with those services;
- your privacy;
- how we deal with complaints;
- our compensation arrangements; and
- how we can be contacted.

This FSG should assist you in deciding whether to use any of the products and services we offer.

When someone gives you personal advice recommending one of our products or offers to sell or issue to you one of our products you will receive a Product Disclosure Statement (“**PDS**”) relating to that product before you acquire it. You should read the PDS carefully as it contains important information to assist you in making an informed decision about the product.

This FSG is not intended for “wholesale clients” (as defined by the *Corporations Act 2001* (Cth) (“**Corporations Act**”).

What Financial Services and products does Pengana offer?

Pengana is authorised under its AFSL to provide financial product advice and to deal in the following classes of financial products to retail and wholesale clients:

- deposit and payment products limited to basic deposit products;
- derivatives;
- foreign exchange contracts;
- debentures, stocks or bonds issued or proposed to be issued by a government;
- interests in managed investment schemes (excluding investor directed portfolio services); and
- securities.

Advice may be provided in the materials that we produce, including promotional videos, investment newsletters, investor reports, answering client queries and other website or marketing material. This information generally relates to investing in managed investments, managed investment product features, managing risk and return, market commentaries and economic overviews. This information is intended to allow you to assess your own circumstances against the product in which you may wish to invest.

Pengana is also authorised by its AFSL to operate registered managed investment schemes and to operate and provide custodial services with respect to unregistered managed investment schemes (collectively known as "**Funds**").

Although we are authorised under our AFSL to do so, we do not provide personal financial product advice, i.e. advice that takes into account your personal financial situation, needs or objectives. If you would like personal advice, you should contact a licensed financial advisor. The advisor is obliged to provide you with a Statement of Advice in respect of any personal financial product advice given to you.

Who is Pengana?

Pengana acts on its own behalf as the holder of an AFSL when it gives financial product advice and issues interests in its Funds. Pengana acts as responsible entity and/or trustee of the Funds it operates and deals in financial products on behalf of these Funds.

Pengana is responsible for the services we provide, and we are not an authorised representative of any other AFSL holder.

Pengana is a wholly owned subsidiary of Pengana Holdings Pty Ltd (ACN 103 765 082) ("**PHL**"). PHL is entitled to receive dividends from Pengana. PHL is wholly owned by Pengana Capital Group Limited (ACN 059 300 426), which is listed on the Australian Securities Exchange under the ticker PCG.

There are no associations and/or relationships that might reasonably be expected to be capable of influencing Pengana in providing any of the financial services to you.

How you may instruct us

Pengana does not accept instructions from clients to deal in a financial product other than requests to issue, vary or withdraw an investment in one of our Funds. The initial investment into a Fund must be done in accordance with the application process described in the relevant PDS.

Should you wish to add to your existing investment in one of our Funds, you should follow the procedure for effecting additional investments as described in the relevant PDS.

Should you wish to reduce your investment in one of our Funds, you should follow the procedure for reducing your investment as described in the relevant PDS.

Payments to Pengana and others for the services provided

Management Fees and Costs received by Pengana

Pengana may receive remuneration in the form of management fees (which may include a performance fee) in return for the provision of investment management services, marketing and sales services, and where relevant, responsible entity and trustee services. We may also be entitled to recover expenses or costs incurred in connection with the financial product or service. We may also enter into transactions with other Pengana group entities or appoint other Pengana group entities to provide services, including investment management services, to the financial products and services we offer and accordingly, Pengana group entities would receive remuneration for acting in such capacity. The management fees and costs are generally based on a percentage of the value of your investment and/or the return on your investment and are set out in the relevant PDS.

Payments to Pengana's employees

Pengana's employees, directors, and other staff are paid a salary but do not receive any commissions. However they may be eligible for bonus payments from us based on their performance

in meeting or exceeding individual, team, or company performance objectives (which may include the level of product sales revenue generated). It is not possible to determine the absolute value of a bonus and whether an employee will receive such a payment until the end of the performance cycle.

Fund manager payments and product access payments

From the fees that Pengana receives, we may pay a product access payment to any wrap platform, master trust or other investment administration service (“**Platform**”) through which various products are made available. Any product access payments are a flat dollar amount paid each year to a Platform for the administration and investment related services which may be an amount of up to \$30,000 per annum (GST inclusive) per Platform.

The amount of these payments may change during the life of the FSG. As these amounts are paid by Pengana out of its own resources, they are not an additional cost to you.

Fees paid to financial advisers and other persons

Any financial product advice provided by Pengana is free of charge.

Pengana does not pay commissions to financial advisers who provide financial product advice to retail clients.

Pengana may make alternative forms of payments or benefits (including sponsorship, gifts and entertainment) to financial advisers, dealer groups and platform providers who provide financial product advice to retail clients where those payments are less than \$300 per annum or are given in relation to providing information technology support or software used for professional development, or for genuine educational and training purposes. If these amount or benefits are provided, they are payable out of Pengana’s own resources and are not an additional cost to you. We maintain a register that outlines all of the alternative forms of payments or benefits that we make to financial advisers, dealer groups and platform providers or receive from them. The register is publicly available and you can obtain a copy by contacting us.

Related parties

Pengana or its associates, officers or employees may have interests in particular financial products by acting in various roles including as the investment manager of a fund issued by Pengana, holder of principal positions or adviser in respect of that financial product.

Conflicts of interest

Potential conflicts may arise between the interests of investors, ourselves and our related parties and other parties (including service providers appointed by us). Pengana has statutory and common law fiduciary duties to manage conflicts of interests of investors and, if there is a conflict, give priority to investors’ interests and/or duties (as applicable). We have adopted conflict of interest policies aimed at ensuring that any potential conflicts of interest that could impact the services provided to you are managed, disclosed or removed.

The Privacy of your personal information

At Pengana, the privacy of your personal information is important to us. Any personal information collected will be handled in accordance with our Privacy Policy and our obligations under relevant privacy laws.

Our Privacy Policy sets out details of how we comply with our legal obligations in the handling of your personal information. A copy of our Privacy Policy is available upon request, or via our website www.pengana.com.

Complaints Handling

We have established procedures to properly consider and address any complaint you may have. A copy of the “Summary of Complaints Handling Procedures – Information for Clients” is available on request. If you wish to make a complaint about any of our products or services, please contact our Complaints Officer using the following contact information:

Complaints Officer, Pengana Capital Limited
Level 27, Governor Phillip Tower, 1 Farrer Place
Sydney NSW 2000

Or

Complaints Officer, Pengana Capital Limited
PO Box R1855
Royal Exchange, NSW 1255

Telephone: +61 2 8524 9900
Fax: +61 2 8524 9911
Email: clientservice@pengana.com

If you are not satisfied with our response to your complaint, you may lodge a written complaint with the Australian Financial Complaints Authority for an independent review of your matter.

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Telephone: 1800 931 678
Facsimile: (03) 9613 6399
Email: info@afca.org.au
Website: www.afca.org.au

This external dispute resolution body is established to assist you in resolving your complaint where you have been unable to do so with us. However, it is important that you contact us in the first instance so we can address your concerns.

You can also contact the Australian Securities and Investments Commission on their free call line 1300 300 630 in order to make a complaint and to obtain information about your rights.

Compensation Arrangements

We hold professional indemnity insurance which, in our opinion, complies with the requirements of section 912B of the Corporations Act. The professional indemnity insurance that we have in place covers claims in relation to the conduct of staff and employees who no longer work for us (but who did at the time of the relevant conduct).

How you can contact Pengana

Mail: Pengana Capital Limited
PO Box R1855
Royal Exchange, NSW 1255

Telephone: (02) 8524 9900
Facsimile: (02) 8524 9901
Website: www.pengana.com