

EC.POHL & CO
RE LTD



Activating Long Term Investing



FINANCIAL SERVICES GUIDE (FSG)



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EC Pohl & Co RE Ltd

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This Financial Services Guide is issued by EC Pohl & Co RE Ltd ABN 41 671 793 365, Australian Financial Services Number 554 769.

The Financial Services Guide ("FSG") is an important document. It is designed to assist you in deciding whether to use any of the financial services and products offered by EC Pohl & Co RE Ltd ("ECPRE", "we" or "us"). As an Australian Financial Services Licensee ("AFSL"), in certain circumstances ECPRE may be required to provide you with this FSG if we provide certain financial services to you and you are a retail client.

This FSG is designed to help you understand our services and products before you use them or invest in them. You will receive other disclosure documents as well if you use some of our products and services. You should read them carefully and consult with your licensed financial adviser if required.

Company Profile

EC Pohl & Co RE Ltd was formed in 2023 to operate as the responsible entity, trustee and fund administrator for retail and wholesale managed investment schemes managed by the EC Pohl & Co Pty Ltd (ABN 68 154 399 916) and related companies.

EC Pohl & Co Pty Ltd has built a 25-year track record managing investments for high net worth individuals and our business serves sophisticated investors, large institutional mandates, listed investment companies and managed funds.

Values

Our corporate philosophy is made up of five core values that guide our approach to business:

1. Beliefs and process first and foremost – Our beliefs and our investment process guide everything we do. Internally, this manifests in an idea meritocracy, where every person has the capacity to suggest, research and reject an idea.
2. Sleeping well before eating well – We are a highly ethical team, committed to good investing. We're relentlessly transparent, honest about our capacity and vigilant in applying our process. We do this because there's simply no other way we can deliver on our promises.
3. A genuine long-term approach – We believe in nurturing strong relationships in every part of our business – with our customers, between colleagues and with our portfolio organisations – because in order to deliver sustainable growth, we need to think long-term.
4. Diverse ways of thinking – To create our high performing portfolio we need to be capable of thinking methodically and discerningly, but also broadly and openly.
5. Demystifying active investing – It's important that our clients understand and therefore trust our process. We want to show everyone the how's, why's and where's of active investing, in the simplest, most digestible way possible.



Our Financial Services and Financial Products

Under our Australian financial services licence (AFSL) we are authorised to provide the following financial services with respect to the following financial products:

- (a) provide financial product advice to wholesale clients for the following classes of financial products:
 - (i) deposit and payment products limited to:
 - (A) basic deposit products;
 - (B) deposit products other than basic deposit products;
 - (ii) derivatives;
 - (iii) foreign exchange contracts;
 - (iv) debentures, stocks or bonds issued or proposed to be issued by a government;
 - (v) interests in managed investment schemes excluding investor directed portfolio services; and
 - (vi) securities;
- (b) provide general financial product advice to retail clients for the following classes of financial products:
 - (i) interests in managed investment schemes excluding investor directed portfolio services; and
- (c) deal in a financial product by:
 - (i) issuing, applying for, acquiring, varying or disposing of a financial product to retail and wholesale clients in respect of the following classes of financial products:
 - (A) derivatives;
 - (B) foreign exchange contracts; and
 - (C) interests in managed investment schemes excluding investor directed portfolio services; and
 - (ii) applying for, acquiring, varying or disposing of a financial product to retail and wholesale clients on behalf of another person in respect of the following classes of products:
 - (A) deposit and payment products limited to:
 - (1) basic deposit products;
 - (2) deposit products other than basic deposit products;
 - (B) derivatives;
 - (C) foreign exchange contracts;
 - (D) debentures, stocks or bonds issued or proposed to be issued by a government;
 - (E) interests in managed investment schemes including:
 - (1) investor directed portfolio services; and
 - (F) securities;
- (d) operate the following kinds of registered managed investment schemes (including the holding of any incidental property) in its capacity as responsible entity to retail and wholesale clients:
 - (i) "ECP Global Growth Fund (Aust)" scheme (ARSN: 679 892 285),
 - (A) a scheme which only holds the following types of property:
 - (1) financial assets; and
 - (iii) "EC Pohl Mid Market Opportunities Fund" scheme (ARSN: 679 894 163),
 - (A) a scheme which only holds the following types of property:
 - (1) financial assets; and
- (e) provide the following custodial or depository services to retail and wholesale clients:
 - (i) operate custodial or depository services other than investor directed portfolio services.

Product Disclosure Statement (PDS)

A PDS is a document that describes a financial product, its key features and the benefits, fees and risks associated with it. Before you can invest in one of our retail financial products we will provide you with a PDS. This document should be read carefully to enable you to make an informed decision about whether to invest in the financial product. You should consult with your licensed financial adviser if required.



Statement of Advice (SOA)

A Statement of Advice (SOA) will normally be given to you when you are a retail client that is provided with any personal advice which takes into account your objectives, financial situation and needs. We do not provide personal advice therefore, we will not provide you with an SOA, but an intermediary (such as a financial planner, stockbroker or dealer group) may provide you with an SOA.

Remuneration or other benefits received by us

If you invest in a financial product we provide, we will receive remuneration in relation to your investment in the financial product. This remuneration may comprise of responsible entity/trustee and administration fees. We may also be entitled to recover expenses incurred on behalf of the financial product or service. The remuneration and expense recoveries we will receive will be set out in the financial product's PDS.

We do not receive any fees, nor do we charge you additional fees for providing general financial product advice.

You may receive advice about ECPRE financial products from financial advisers who do not work for ECPRE. We do not pay remuneration or commissions to financial advisers. Your adviser is required to set out the remuneration and commissions they do receive in the FSG and SOA which they must give to you.

We may provide benefits to financial services intermediaries where the law permits us to do so. If we do, we will generally provide these benefits from the fees you pay when investing in our products or from our own resources (or those of our managers).

Remuneration or other benefits received by our employees

ECPRE receives no remuneration, commission or other benefits in connection with the distribution of a PDS, or other disclosure document or for providing general financial advice. ECPRE does not pay any fees to anyone in connection with a referral to ECPRE.

Our employees who give you general advice do not receive specific payments or commissions for giving that advice. These employees and our directors receive salaries, bonuses and other benefits from us. Bonus payments and other benefits are discretionary and based on achievement of predetermined targets related to their position.

Compensation Arrangements

ECPRE maintains a professional indemnity insurance policy that meets the requirements of s912B Corporations ACT 2001 (Cth).

Anti-Money Laundering (AML) and Counter-Terrorism Finance (CTF)

ECPRE is required by to complete identification checks of all new and existing clients in accordance with the AML CTF Act 2006 (Cth). All sensitive information is held in the strictest confidence in accordance with our Privacy Policy.

Privacy

Your right to privacy is important to us. ECPRE maintains all personal information in accordance with our Privacy Policy and the Privacy Act 1988 (Cth). A copy of our privacy policy is available on our website at www.ecpohl.com/RE



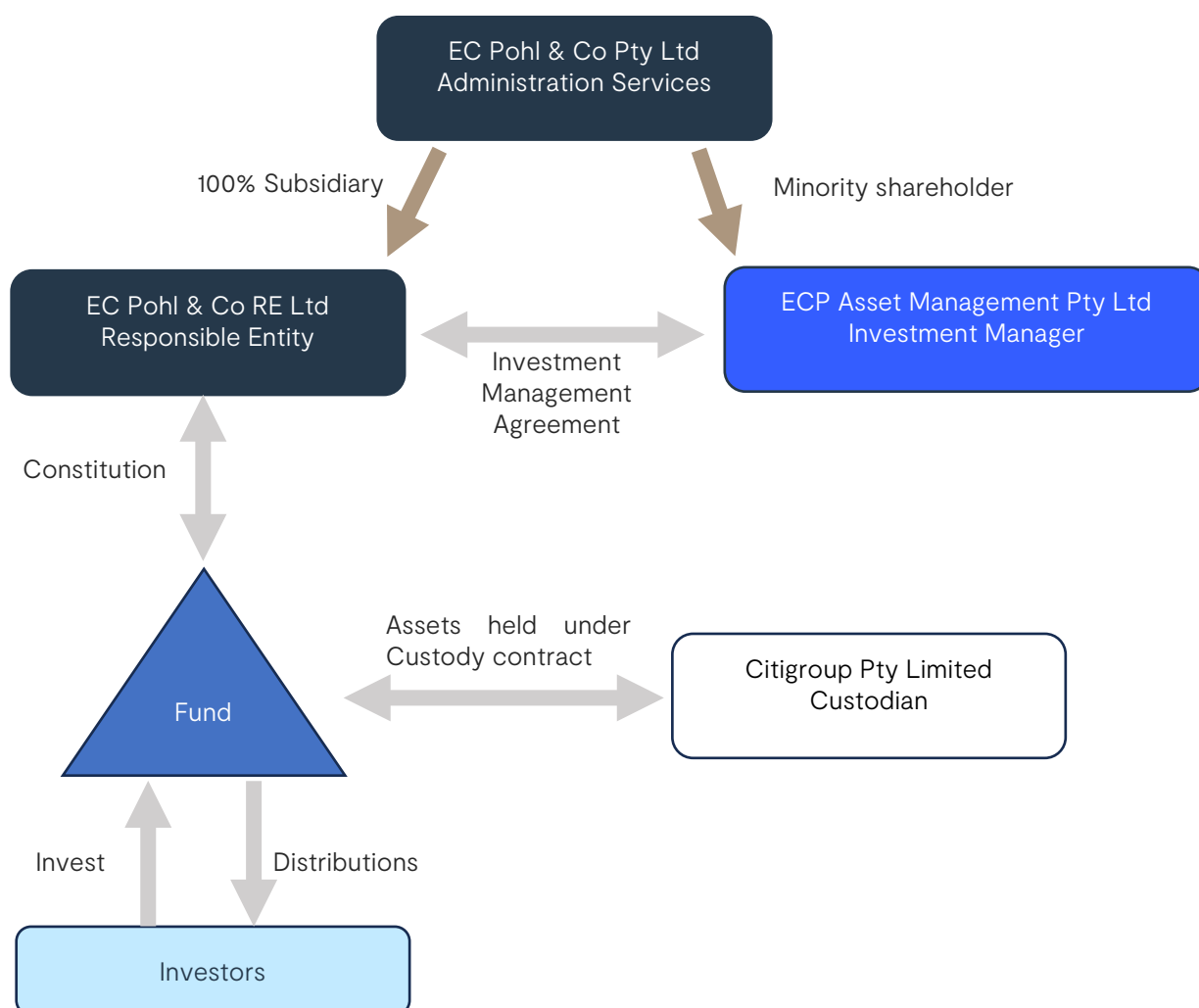
Outsourcing and Fund Custodian

ECPRE is licensed to provide custodial services to clients. We have outsourced the custody to *Citigroup Pty Limited* (ABN 88 004 325 080 and AFSL No. 238098) as custodians to hold fund property on behalf of the managed schemes:

We may, from time to time, outsource other functions including administration and investment management. ECPRE monitors the performance of all external providers to ensure they are operating in accordance with the Outsourcing policy and the service level agreements in place to measure performance.

Conflicts of Interest

Conflicts may arise between the interests of ECPRE and those of investors, related parties or other third parties. The below graphic depicts the relationship between the entities. We have documented policies and processes to control, avoid and disclose conflicts of interest if they arise. Directors and employees may hold investments in retail funds where ECPRE acts as responsible entity or trustee.





Complaints

ECPRE is dedicated to ensuring that any client complaint that we may receive is managed in an efficient and professional manner.

If you have any concerns about the service provided to you, please speak to your financial adviser. If you are not satisfied with the outcome, please contact our complaints officer:

Complaints Officer
EC Pohl & Co RE Ltd
Level 12, Corporate Centre One,
2 Corporate Court
Bundall QLD 4217

External Complaints Service

If you believe your complaint has not been resolved and wish to seek further advice, you may contact the Australian Financial Complaints Authority (AFCA).

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

Post:

Australian Financial Complaints Authority
GPO Box 3,
Melbourne VIC 3001

Contact Us

You can contact us by telephone, email or mail:

Email: fund-admin@ecpohl.com

Phone: +61 7 5644 4400

Post:

PO Box 7536
Gold Coast Mail Centre QLD 9726

**EC.POHL & CO
RE LTD**



EC Pohl & Co RE Ltd
2 Corporate Court
Bundall QLD 4217
Australia

PO Box 7536
GCMC Bundall QLD 9726
T. +61 7 5644 4400

ABN: 41 671 793 365
AFSL: 554 769
www.ecpre.com.au
fund-admin@ecpohl.com