



29 November 2023

Financial Services Guide

CF Capital Investments Pty Ltd
ABN 14 633 394 751

This Financial Services Guide (FSG) is an important document which provides you with information about CF Capital Investments Pty Ltd ABN 14 633 394 751 (referred to as 'CF Capital', 'we', 'us', 'our') to help you decide whether to use our services. This FSG explains:

- Who we are
- The range of financial services and products we may provide to retail clients
- The remuneration that may be paid to us or our associates in relation to the services offered
- How we protect your personal information
- How we handle complaints, and
- How you can give us instructions or contact us

To invest in any of our funds which are not quoted for trading on a financial market, you must obtain a copy of the relevant Product Disclosure Statement (PDS), available from our website at www.cfcapital.com.au. The PDS will contain information about the product, including the investment approach, the fees and charges, benefits and risks and will assist you in making an informed decision about the product. To invest in one of these products you will need to complete the Application Form accompanying the PDS.

An investment in one of our funds is not a deposit with or other liability of CF Capital and is subject to investment risk including possible delays in repayment and loss of income or principal invested. Neither CF Capital nor any other related company guarantees the performance of our funds, the return of capital from the funds or any particular rate of return.

Prepared by:	Version	Date adopted	Overview of Changes
Ilya Frolov	1.0	5 July 2021	Creation of Financial Services Guide
Ilya Frolov	1.1	5 November 2021	Update to Complaints Section and Disclosure of Lack of Independence
Ilya Frolov	1.2	29 November 2023	Minor updates as per independent review



About Us

CF Capital is an Australian Corporate Authorised Representative [CAR 001 286 471] of Keystone Asset Management Ltd (“KAM”) (AFSL no. 491477). CF Capital is licensed to act as investment manager of funds which are registered managed investment schemes, to deal in a range of financial products, and to provide general advice in relation to managed investment schemes. We offer a range of unlisted funds and actively managed single-asset and multi-asset funds (‘the Funds’) to retail and wholesale investors.

Investors can access our unlisted funds either directly or through a Platform (e.g. master trust or wrap product), also known as an investor directed portfolio service (IDPS). If you invest directly, you will be issued with units in the Fund. If you invest through a Platform (as an indirect investor), generally your Platform operator or custodian is registered as the unitholder on your behalf.

In offering, promoting and managing our Funds, we provide PDSs, investor newsletters and website material, which provide only factual information and general advice (that is, financial product advice that is not personal advice) that does not take into account your particular financial objectives, situation or needs. Accordingly, a statement of advice will not be provided and you will need to consider the appropriateness of the information we provide to you having regard to your particular circumstances. Before investing in our funds you should seek your own financial advice to consider the suitability of our funds or fund of funds for your individual needs.

The distribution of this FSG by CF Capital has been authorised by KAM.

Custodian and Administrator

Custodian

Our Responsible Entity (“RE”, “KAM”) has appointed a party, Certane CT Pty Ltd (ACN 106 424 088) (‘Custodian’ or ‘Certane’), as custodian to hold the assets of the Funds and act on the direction of the RE to effect cash and investment transactions. Certane’s role as custodian is limited to holding the assets of the Funds on our behalf. Certane has no supervisory role in relation to the operation of funds and has no liability or responsibility to a unitholder for any act done or omission made in accordance with the Custodian Agreement.

Administrator

The RE has also appointed Boardroom Pty Limited (ABN 14 003 309 836) (‘Administrator’ or ‘Boardroom’), as administrator to receive application and withdrawal requests and to maintain the unit registry. Boardroom has no supervisory role in relation to the operation of funds and has no liability or responsibility to a unitholder for any act done or omission made in accordance with the Administrative Agreement.

What Fee’s Are Paid For Our Services?

The fees charged for each Fund we offer is the aggregate amount of the Responsible Entity’s and Investment Manager’s fee. For our funds, the fees we charge are disclosed in the PDS of each Fund and reflected in the unit price.

You may request particulars of any remuneration, commission or benefits payable to CF Capital in respect of a particular product or service



Payments to Third Parties

CF Capital does not pay commissions to financial advisers to promote our funds to retail investors. Nor do we receive commissions from third parties referring investors to us. We may make one-off or annual non-volume based shelf space payments to third party platform providers (wrap products, master trusts or other investor directed portfolio services) for distributing our funds. These payments do not represent an additional cost to you and are paid by us.

Your financial adviser may charge you fees for providing personal advice (that is advice that takes into account your objectives, financial situation and needs) and must set out the remuneration and commissions they receive in the FSG and/or Statement of Advice (SOA) they must provide to you. As we do not provide personal advice to retail clients you will not receive an SOA from us.

We do not charge fees for any factual information or general advice provided. Our staff and/or associates receive remuneration in the form of a salary and may be entitled to receive a performance bonus and other benefits from time to time. These are paid by CF Capital and are not an additional cost to you.

What Kind of Compensation Arrangements are in Place?

CF Capital maintains compensation arrangements that are adequate for the potential for compensation claims to be made against us for financial services we have provided. We maintain Professional Indemnity insurance cover that complies with s912B of the Corporations Act 2001 (as amended) and ASIC Regulatory Guide (RG) 126. This insurance will continue to provide such coverage for any employee who has ceased working with us, but for work done while engaged with us.

How You can Provide Us with Instructions

To change your investment or personal details or to conduct transactions please instruct the Responsible Entity using the relevant form on the www.kam.limited website, including the Change of Details Form, Change of Adviser Form, Additional Investment Form and Withdrawal Request form.

Privacy

We recognise the importance of protecting your privacy. Your personal information will be handled in accordance with our privacy policy, which outlines how the information we collect from you is used, stored and disclosed. The main reason we collect, use and/or disclose your personal information, is to provide you with the products and services that you request.

We may disclose your personal information to the following parties on the basis that they deal with such information in accordance with our Privacy Policy:

1. service providers to whom services may be outsourced such as mailing functions, statement production, information technology support and direct marketing services;
2. third parties that act on your behalf or that are otherwise connected with you (such as your legal adviser or financial adviser).

We are also permitted to collect and disclose your personal information when required or authorised to do so by law. If an investor provides incomplete or inaccurate information, the investor's application form may not be able to be processed.

You can contact our Responsible Entity to request access or correction to your personal information, or if you have a complaint about the way we handled your personal information, by contacting the Privacy Officer:



Mail Privacy Officer
Keystone Asset Management
Level 3, 424 St Kilda Rd, Melbourne 3004

Email privacy@kam.limited

Tel 1800 343 896 (Toll free)

You may obtain a copy of CF Capital's Privacy Policy which sets out further details and complies with the Australian Privacy Principles at www.cfcapital.com.au.

Contact Details

Phone 1800 343 896

Email investor@cfcapital.com.au

Website www.cfcapital.com.au

Mail Level 3, 424 St Kilda Rd, Melbourne, VIC 3004

Complaints

If you wish to make a complaint, please contact us on 1800 343 896 during business hours or address your complaint to:

Complaints Manager, Keystone Asset Management Limited, Level 3, 424 St Kilda Road, Melbourne VIC 3004

or email complaints@kam.limited

Complaints (Cont.)

We will acknowledge your complaint within one (1) business day of being received. If we can promptly address your complaint within thirty (30) days we will provide details of the methodology used to investigate and resolve your complaint, along with our decision regarding your complaint. If we are not able to resolve your complaint within thirty (30) days of receiving it we will, before the expiry of thirty (30) days, provide you with written confirmation of the investigation(s) we have undertaken as well as details of when we anticipate to be in a position to arrive at a decision regarding the circumstances associated with your complaint.

If you have invested through an IDPS, superannuation fund or master trust and you have a complaint, you can contact the operator of such service, using the contact details they have provided. The operator of such service may respond to your complaint in accordance with processes that are different to those set out in this document. Alternatively, whether you are a direct or indirect investor you can contact our Complaints Manager, whose details are provided above.

If you are not satisfied with the resolution of your complaint you may contact the Australian Financial Complaints Authority (AFCA), an independent body approved by ASIC to consider the merits of retail complaints, as follows:

Mail Australian Financial Complaints Authority Limited
GPO Box 3, Melbourne VIC 3001



Email info@afca.org.au

Tel 1800 931 678 (free call)
