



Pinnacle Investment Management Limited Pinnacle Fund Services Limited

Financial Services Guide

November 2023

Table of contents

Introduction	1
About Pinnacle	1
Financial services of Pinnacle	1
Documents for Retail Clients	2
Associations or relationships with financial product providers	2
Remuneration.....	2
Insurance coverage.....	3
Conflicts of interest.....	3
Your privacy	3
How we deal with Complaints	4
Contact Details.....	4

Introduction

27 November 2023

This Financial Services Guide (**FSG**) is issued by Pinnacle Investment Management Limited ABN 66 109 659 109, AFSL 322140 (**PIML**) (referred to in this FSG as **Pinnacle**) and is designed to provide information about the financial services provided by Pinnacle (**us** and **we**) including:

- who we are;
- the services and types of products we are authorised to provide;
- how we and others are paid in connection with those products;
- how we deal with privacy;
- how we deal with complaints; and
- how we can be contacted.

About Pinnacle

Pinnacle is a multi-affiliate investment management firm. Our mission is to establish, grow and support a diverse stable of world-class fund managers. The Pinnacle group currently consists of specialist investment managers in which PIML holds an equity interest that specialise in investing across a range of asset classes (**Affiliates**).

Pinnacle's philosophy is to provide Affiliates with the infrastructure and resources to allow investment professionals to focus on delivering superior investment performance. Langdon Equity Partners Limited ('Langdon') is a Corporate Authorised Representative (No. 1304255) of PIML.

PIML undertakes distribution on behalf of Affiliates by marketing and promoting their investment management capabilities and managed funds.

Financial services of Pinnacle

PIML is authorised under its AFSL to carry on a financial services business to:

- (a) provide general financial product advice for the following classes of financial products:
 - deposit and payment products limited to:
 - (a) basic deposit products;
 - (b) deposit products other than 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 including:
 - (a) investor directed portfolio services;
 - interests in managed investment schemes limited to:
 - (b) MDA services;
 - securities; and
 - superannuation
- (b) deal in a financial product by:
 - arranging for another person to issue, apply for, acquire, vary or dispose of a financial product in respect of the following classes of financial products:
 - (a) derivatives; and
 - (b) foreign exchange contracts; and

- applying for, acquiring, varying or disposing of a financial product 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;
 - (f) securities; and
 - (g) superannuation;

to retail and wholesale clients.

PIML provides the above financial services on its own behalf, including in its capacity as a provider of distribution services to the specialist investment managers within the Pinnacle group.

PIML will only provide general financial product advice as it is not authorised to provide you with personal financial product advice. We will only provide you with factual information or general advice regarding certain financial products.

Some of the investment managers within the Pinnacle group are Corporate Authorised Representatives of PIML and their employees are responsible for making investment and divestment decisions in relation to the funds they manage and for implementation of the investment strategy.

Your dealings with Pinnacle, including with Pinnacle Fund Services Limited (**PFSL**), will be through your financial adviser, your platform provider, our Distribution team or through your direct investment in our managed investment schemes. PFSL is the product issuer of the Langdon Global Smaller Companies Fund (ARSN 657 901 614).

Documents for Retail Clients

The Product Disclosure Statement (**PDS**) of each managed investment scheme operated by PFSL is available at <https://pinnacleinvestment.com/affiliates/#funds> - available as well as on the relevant Affiliate's website. PFSL is not licensed to provide financial product advice. The PDS of each managed investment scheme contains important information regarding the features, benefits, risks and fees applicable to that scheme. You should read the PDS carefully to enable you to make an informed decision about whether to invest in the scheme.

Associations or relationships with financial product providers

PIML holds equity interests in Affiliates and provides them with a comprehensive range of high quality and cost-effective distribution and other non-investment support services.

Remuneration

There are no commissions or fees payable to Pinnacle or Langdon employees directly for any general advice or service delivered. Pinnacle and Langdon employees receive a salary and may receive bonuses and other benefits from time to time. Bonuses and other benefits are subject to factors such as company performance, volume of sales and performance of the individual employee. However, these bonuses and other benefits are a minority portion of their remuneration and are at no additional cost to you.

You may receive advice about our products from financial advisers. Your adviser is required to set out their remuneration in the FSG and/or Statement of Advice they give to you. If you have an ongoing fee arrangement with your financial adviser they must also provide you with a fee disclosure statement on an annual basis.

If you invest in a product or service that we provide, we will receive remuneration in relation to your investment, usually based on the dollar amount you invested in that product or service (e.g., management fees). The fees and costs applicable are outlined in the product disclosure statement for the product. As responsible entity, PFSL earns a fee for providing that servicing in addition to the remuneration received for any other support services provided to the specialist investment managers.

Insurance coverage

Under the Corporations Act 2001 (**Act**) s912B and regulations made under that Act, Pinnacle as the holder of an AFSL is required to have professional indemnity insurance that is adequate having regard to the nature of our business and the potential for compensation claims. Pinnacle has an insurance policy in place which covers professional indemnity, crime and directors & officer's liability insurance. Pinnacle is satisfied with the adequacy of that cover. The cover available to Pinnacle extends to include losses arising from the conduct of former employees or representatives of Pinnacle (which occurred during their employment with, or service for Pinnacle) as if those persons were still employed by, or were still representatives of, Pinnacle. Senior management reviews the insurance coverage and policies annually.

Conflicts of interest

Potential conflicts may occasionally arise between the interests of investors, ourselves, our related parties or other third parties (including service providers appointed by us). We have statutory and common law fiduciary duties to manage conflicts of interest and act in the best interests of investors, and if there is a conflict, give priority to investors' interests.

We have policies, procedures and organisational arrangements in place to manage conflicts of interest. Pinnacle or any related parties of Pinnacle or any director or officer of any of them may invest in any financial product that we or our related companies issue or manage.

From time-to-time Pinnacle's directors may hold interests in shares or financial products issued by Pinnacle or our related companies.

Your privacy

We take reasonable steps to ensure that personal information about an investor that we collect, use or disclose is accurate, complete and up to date. All personal information collected will be handled in accordance with our Privacy Policy.

Under the Privacy Act 1988 and its amendments, an investor may request access to the personal information we and our service providers hold about them. The investor may request to amend or correct information, however if we do not agree with the requested changes, we are not obliged to make those changes.

The investor can request access to their personal information or a copy of our Privacy Policy by contacting:

Privacy Officer

PO Box R1313
ROYAL EXCHANGE NSW 1225
Email: Risk.Compliance@pinnacleinvestment.com
Phone: 1300 010 311

For complaints concerning privacy matters which have not been resolved to your satisfaction, you can then lodge a complaint with the Office of the Australian Information Commissioner via their online Privacy Complaint Form, available at <https://www.oaic.gov.au/privacy/privacy-complaints/>

How we deal with Complaints

Pinnacle's complaints handling process is designed to ensure that any concerns or feedback you may have are dealt with appropriately, promptly and fairly. Your concerns may be provided either verbally or in writing in strict confidence to:

Risk & Compliance Manager
Pinnacle Investment Management Limited
PO Box R1313
Royal Exchange NSW 1225
Email: complaints@pinnacleinvestment.com
Phone: 1300 010 311

All complaints received will be acknowledged in writing within 1 Business Day, where possible. Pinnacle will act in good faith to ensure your complaint is investigated and resolved. If your issue has not been satisfactorily resolved within 30 days, you may be entitled to refer your complaint to the Australian Financial Complaints Authority Limited.

Australian Financial Complaints Authority (AFCA)
GPO Box 3 Melbourne VIC 3001
Tel: 1800 931 678
Email: info@afca.org.au
www.afca.org.au

AFCA provides fair and independent financial services complaint resolution that is free to consumers. There are some time limits for lodging certain complaints. Please consult the AFCA website to find out if or when the time limit relevant to your circumstances expires. AFCA will be able to advise you whether they can assist you in this matter. Our membership number is 12722, which you should quote when referring your complaint.

Contact Details

Pinnacle Investment Management Limited
Level 19, 307 Queen Street
BRISBANE QLD 4000
GPO 1205
Brisbane 4001, Australia
Phone: 1300 010 311
Email: distribution@pinnacleinvestment.com
Website: <https://pinnacleinvestment.com/>