



HALO Technologies Pty Ltd  
ABN 54 623 830 866  
CAR 1261916 of Macrovue Pty Limited ABN 98 600 022 679 AFSL 484264

## FINANCIAL SERVICES GUIDE

### What is a Financial Services Guide?

This Financial Services Guide (FSG) is issued to you as a retail client to assist you to understand and decide if you wish to use the financial services we may offer you. It gives you information about the entities that may provide you with financial services.

HALO Technologies Pty Ltd (HALO Technologies) is the providing entity for financial products and services offered by it as a corporate authorised representative under the Macrovue Pty Limited (Macrovue) Australian Financial Services Licence.

In this FSG, we collectively refer to Macrovue, HALO Technologies and our representatives as 'we', 'us', 'our' and 'HALO'.

This FSG sets out the services we provide and explains:

- who we are and how we can be contacted;
- who the licensee is and how it can be contacted;
- what services and products we are authorised to provide to you;
- how we (and any other relevant parties) are paid; and
- any relationships we have with any other organisations affiliated with us or with product issuers, which might influence us in providing financial services to you; and
- how we deal with complaints.

Please retain this FSG for your reference and any future dealings with us. We may also add supplementary documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'Supplementary FSG' in the heading.

### Purpose of this FSG

This FSG provides information to you about your client rights and obligations under the Corporations Act 2001 and Regulations (Corporations Act) and about our services, charges, and obligations to our retail clients. This FSG contains information on investment risk, interests of ours which may conflict with yours, and remuneration/benefits payable to HALO and others if you use our services. Charges, commissions, or fees not listed in the body of or in a schedule to this FSG are listed in a separate fees schedule which will be provided when you complete an account application and before you commence trading, and also on request.

This FSG also tells you what to do if you have a complaint and how we will handle it. It explains the protection of, and why we need and how we use, the Personal Information that you may provide to us, if our services are used.

It is our objective to provide you with clear, concise, and effective disclosure about our products and services which may assist you to determine whether to use any of our products and services. Should you choose to use any of our services and products, you may also receive other documents relevant to the services or products which you should also read carefully and ensure that you understand.

### Warning – General Advice only

Nothing contained in this FSG constitutes the giving of personal advice for a recommendation concerning an investment in a particular financial product. In preparing this FSG, HALO has not taken into account the investment objectives, financial situation or particular needs of any individual client. This FSG only contains factual information or general advice. Before making a decision whether to invest in a particular financial product you should speak to your financial service provider and obtain independent tax advice taking into account your own particular objectives and financial circumstances and needs.

## General Advice

HALO only provides information to you on a general advice basis which is a rating or assessment based solely on the attributes of the financial product, the portfolio or investment strategy alone without considering whether it is also appropriate for your investment objectives, financial situation, or particular needs.

General Advice includes research reports, analytical tools, webinars and newsletters and may also be provided verbally or in writing by your adviser. You must not assume that any research recommendations or ratings are appropriate for you personally. The process of profiling a client's relevant circumstances and financial objectives is not relevant in relation to General Advice. General Advice may be derived from fundamental analysis; ie. analysis of financial reports, or technical analysis (patterns in market trading and price-movement behaviour).

Additionally, HALO will not enter trades on your behalf without your instructions and consent, nor will it monitor or manage your portfolios in any way at any time. You must ensure that you manage your investments and strategies in relation to your portfolio, including HALO online trading accounts.

## Amendments to this FSG

HALO may at its discretion and without any prior or subsequent notice to you, amend or remove any part of this FSG at any time to reflect changes in our practices and or applicable law and regulation.

The current FSG is available at [www.halo-technologies.com](http://www.halo-technologies.com).

If you need to refer to the FSG from time to time to ensure that you are aware of any changes or updates to the FSG, we recommend that you check the website or request a current version which will be indicated by a change in the version number and date noted in the footer of the document. If you do not have access to electronic communication or our website, you may request a copy of this FSG by contacting us.

## Who will be providing the financial services to you?

### The Licensee

The licensee discussed in this FSG is the authorising licensee for the financial services provided to you, and is responsible for those services.

The licensee authorises, and is also responsible for, the content and distribution of this FSG.

The authorising licensee may also appoint and be responsible for the corporate authorised representative and its sub-authorised representatives (these are the advisers who may provide general advice on securities to you and/or arrange execution of your trades).

#### *Licensee details*

Licensee name: Macrovue Pty Ltd  
AFSL number: 484264  
Address: Level 4 10 Barrack Street, Sydney NSW 2000  
Phone: 1300 720 292  
Email: [hello@halo-technologies.com](mailto:hello@halo-technologies.com)

### The Authorised Representative

HALO Technologies Pty Ltd is the providing entity and provides the financial services to you in its capacity as a corporate authorised representative of the licensee.

#### *Authorised Representative details*

Name: HALO Technologies Pty Ltd  
Address: Level 4 10 Barrack Street, Sydney NSW 2000  
Website: [www.halo-technologies.com](http://www.halo-technologies.com)  
Phone: 1300 348 007  
Email: [hello@halo-technologies.com](mailto:hello@halo-technologies.com)

Macrovue Pty Limited is wholly owned by HALO Technologies Pty Ltd and both companies are ultimately wholly owned by HALO Technologies Holdings Limited ABN 73 645 531 219 and its associated entities.

The licensee may also authorise individual authorised representatives who may share the same office as HALO.

The licensee and the authorised representatives discussed in this FSG act on your behalf when financial services are provided to you.

HALO provides clients with the ability to purchase listed financial products in markets in several countries around the world. We make it simple and convenient to invest in international shares via thematic portfolios of multiple stocks, each called a Vue. We also allow you to create and trade your own Vue.

We act on your behalf when arranging the purchase and sale of securities on an applicable exchange and the ongoing holding of those securities.

To use our services, you need to agree to our Client Contract. The terms are available on our website. It is important that you read the Client Contract before investing.

Macrovue Pty Ltd has entered into a Consolidated Account Clearing Agreement with Interactive Brokers Australia Pty Ltd (IB) under which IB will provide: i) execution services; ii) clearing services; and iii) sub-custodial services to Macrovue in its capacity as a custodial services provider licensed under AFSL 484264. Macrovue, in turn, provides custodial services to the client. IB is registered with the Australian Securities and Investment Commission (ASIC) and is a participant of ASX, ASX 24, Cboe Australia and various international exchanges. IB does not endorse or recommend any introducing brokers, third-party financial advisers or hedge funds, including HALO. None of the information contained herein constitutes a recommendation, offer, or solicitation of an offer by IB to buy, sell or hold any security, financial product or instrument or to engage in any specific investment strategy. IB makes no representation and assumes no liability to the accuracy or completeness of the information provided in this FSG. For more information regarding IB, please visit [www.interactivebrokers.com](http://www.interactivebrokers.com).

HALO is not a broker or a participant of an exchange and will always engage a licensed third-party executing broker to effect transactions. These executing brokers are clearing participants or they will engage a clearing participant to settle trades. Under their terms of engagement, these executing brokers have placed limits on their liability, do not guarantee the availability of their services and have rights in relation to the securities that are purchased through them which they might be able to exercise contrary to your interests. Accordingly, HALO cannot guarantee that your trades will be executed either at all, within a particular timeframe or at a particular price.

HALO and their related bodies corporate do not have any relationships with the issuers of financial products that might reasonably be expected to influence HALO in providing any of the authorised services listed below.

## How you may provide instructions to us

If you wish to execute transactions using our services, you can give us instructions through your HALO online trading account. The method by which HALO will accept your instructions is subject to the terms and conditions of trading with HALO (accessible from the HALO Technologies website).

HALO will not accept instructions from you to execute transactions on your behalf that are received by e-mail or post.

We arrange for all security trades to be executed, cleared and held in sub-custody by Interactive Brokers Australia Pty Ltd. What services and products are we authorised to provide to you?

HALO Technologies is authorised to offer the following financial services to retail and wholesale clients:

- Provide General Financial Product Advice; and
- Deal in Financial Products; and
- Provide Custodial and Depository Services.

Products on which we are authorised to provide general financial product advice and deal in are:

- Interests in Managed Investment Schemes (excluding investor directed portfolio services); and
- Securities.

HALO currently provides financial services in relation to its authorised products electronically, via its research and analytical solution and trading facility. The HALO solution gives access to tools and resources that are designed to support clients' investment decision-making process on a general advice basis as well as enables clients to place trades through a HALO trading account.

In providing our services, other financial matters may arise. However, we are not authorised to assist with any financial products or services except those explained above. You should seek specific advice from the appropriate professionals (eg. tax accountant) on other matters relevant to you.

If you do not understand any of the information in this Financial Services Guide or have any other questions relating to the terms on which we will be acting, please contact us at the Licensee details above.

## Product Disclosure Statement

If required for specific products, we will provide you with a Product Disclosure Statement (PDS) which you are required to read and understand before making a decision whether or not the product is right for you; eg. meets your relevant circumstances.

A PDS is issued by the product provider and contains information about the product to assist you in making an informed decision about the financial product. It will outline relevant terms, significant risks, and fees and charges associated with the product.

## What do you pay for our services?

The fees you may need to pay for our services include, but are not limited to:

- Subscription fees for access to various HALO Technologies' services and products;
- Brokerage fees on trades executed via your HALO online trading account;
- Foreign exchange conversion fees;
- Research fees;
- Other fees or benefits that are paid with your consent.

### Subscription fees

Subscription fees are payable for access to the HALO solution, including its research and analytical tools, and are calculated as a fixed price, paid in various forms including up-front or at periodic intervals, with cost dependent on the plan you selected at the time of purchase. The pricing for current plans is available at our website [www.halo-technologies.com](http://www.halo-technologies.com).

### Brokerage fees

Brokerage fees are payable each time an Australian or international share is traded (bought or sold) including for all underlying stocks in a thematic portfolio of shares called a Vue. The remuneration earned by HALO is \$15 including GST per trade for transactions under \$12,500 value and 0.12% including GST per trade for transactions over \$12,500. The above brokerage rates apply to non-advisory clients only.

### Foreign exchange conversion fees

If you trade in foreign shares, a foreign currency conversion will take place that may attract a conversion fee. We may waive these conversion fees for conversion of small amounts of foreign currency. A foreign currency conversion may also require multiple transactions in order to get filled.

The foreign exchange conversion rate shown to you after your trades have been executed includes a spread of 50 bps which is retained by HALO as remuneration.

Some foreign exchange conversions may require an additional transaction in a third currency if a direct currency pair is not available (e.g. if you buy a Swedish stock then your AUD balance will first be converted to USD before it can be converted to Swedish Krona). This may result in two foreign exchange conversion fees.

### Research fees

Research fees are payable to HALO for the services provided to continuously research the shares in a Vue in which you may choose to invest. The research fees are calculated daily for the market value of the holdings in the Vue on the close of the previous day. The fees are then charged on a monthly basis from your account. The remuneration retained by HALO in relation to research fees is up to 0.8% per annum including GST of the funds invested in a Vue.

You may be charged some or all of these fees, or a combination of them, based on the particular services you agree to use. These fees may be amended and you must check the HALO website for amendments.

## How are we and third parties remunerated?

HALO will receive fees for the sale of subscriptions to retail or wholesale clients who want access to HALO for an agreed period. Where a HALO subscription is sold through its referring partners, HALO may pay a percentage of between 0-50% of the fees received as a rebate to its referring partners.

HALO receives fees for managing the liquidity facility for the DomaCom Fund. DomaCom Limited will charge a fee of 0.55% on the consideration it pays or receives when it buys or sells units in a sub-fund in the course of making a market for those units. Of this fee, DomaCom Limited will pass 0.523% to HALO.

These may be amended from time to time and you may request an update from [hello@halo-technologies.com](mailto:hello@halo-technologies.com).

The Licensee and authorised representative

HALO's directors and employees (including any employees of a related body corporate) may be remunerated by salary and other employee benefits. They may also be eligible for a discretionary bonus. Bonuses will depend on several factors including:

- company performance;
- professionalism and adherence to compliance procedures; and
- team performance.

Shareholders of HALO (including any shareholders of a related body corporate) may also receive a benefit based on the Licensee's ongoing company performance.

You may request more details about the way these people or entities are remunerated within a reasonable time after receiving this document and before any financial services are provided to you.

## What arrangements may influence our advice to you?

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at or above \$300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to educational and training purposes. All alternative forms of remuneration require management approval.

## What is 'Investment risk'?

By 'risk' we mean the possibility that you will suffer some financial harm by investing. Your preparedness and capacity to carry a particular level or type(s) of risk in pursuit of your investment strategy is a fundamental element of your financial circumstances.

General risk disclosure statement and guidance for investors Risks of investing in financial products can be categorised in the following manner, however these do not purport to be complete because it would not be feasible to list all the possible risks in each category.

Equity securities Equity securities in common with all the other asset classes; eg. interest rate securities and property investments, can decline in value as well as appreciate. The measure of this change in value is often referred to as 'volatility'. The more the value varies over time, the more volatile the asset is and therefore the more risk involved in investing in it. On the other hand the less volatile an asset is, the less likelihood there is for any significant capital gain or loss from investing in that asset. Equity securities (e.g. shares) are generally more volatile than other asset classes however, the markets for other asset classes are not as efficient or transparent as the stock market in terms of the information available to investors and the process for continuously determining and making public the real market value of the particular asset. Consequently, the real volatility of those other assets is often not fully appreciated.

Overall market risk This is the risk of loss by reason of movements in the share market generally. These movements can be caused by any number of factors including political, economic, taxation or legislative factors. Specific examples are changes in interest rates, political changes, changes in taxation or superannuation laws, international crises or natural disasters.

### Currency risk

Investing in overseas markets exposes you to additional risks including those related to movements in foreign currency exchange rates.

Limitations of research By 'research' we are referring to printed material that expresses an opinion about particular securities, companies or economic news. The research produced internally and/or outsourced by HALO Technologies, is basically the opinion of specialist analysts. It can never be guaranteed and it is only valid for a limited time and is often subject to market movements. For example, for short term investors a 'buy' recommendation could turn into a 'sell' recommendation if the market price of a share appreciated by a small amount. For the longer term investor, this market movement may not be significant, although a larger movement may be.

The mere fact that an entity is recommended by an analyst in a research report as a "Buy", "Sell" or a "Hold" does not necessarily mean that the entity or that recommendation is a suitable investment for you. The recommendation is based on consideration of the investment merits of the entity alone. You should always consult your adviser for general advice, before acting on any research report. Likewise, any share price targets that may be forecast in a report are based on particular assumptions made by the analyst at the time the report is prepared. A forecast 'target' price is not a guarantee that the price will actually reach that level.

## What should you do if you have a complaint?

We encourage you to contact your adviser to discuss your concerns as soon as possible. If you remain dissatisfied with the matter you have raised or would like to lodge your complaint directly with the Licensee, we ask that you contact us in writing, by email, over the phone or in person:

Complaints Officer  
Macrovue Pty Limited  
By email to [compliance@aaigl.com.au](mailto:compliance@aaigl.com.au)  
OR  
By mail to Level 4 10 Barrack Street Sydney NSW 2000  
OR  
By phone on + 61 3 8686 3880

The Complaints Officer will resolve your complaint or advise you of the steps that Macrovue shall take to review and address your complaint. The issues involved may be complex and subject to special regulations. We will do our best to resolve your complaint quickly and fairly.

In either case, you will receive an acknowledgment within 24 hours (or as soon as practicable) of your complaint being received. We will provide you with our written reasons for the outcome of your complaint within 30 days where your complaint is not resolved within 5 business days of us receiving your complaint or if you request a written response.

Macrovue is a member of the Australian Financial Complaints Authority (AFCA), an ASIC authorised external dispute resolution scheme for the financial services industry. If your complaint isn't resolved to your satisfaction within 30 days, you may then refer the matter to AFCA using the following contact details:

Mail: GPO Box 3, Melbourne Victoria 3001  
Phone: 1800 931 678 (toll free Australia-wide)  
Fax: +61 3 9613 6399  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Online: [www.afca.com.au](http://www.afca.com.au)

We also urge you to refer to our Client Complaints Policy available on our website [www.halo-technologies.com](http://www.halo-technologies.com) where we explain our complaint handling process in detail.

## Compensation arrangements

We maintain adequate professional indemnity insurance as required by s912B of the Corporations Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

## Privacy

We are committed to protecting the privacy, accuracy and security of the personal information provided to us about you by you or others who you have consented to provide such information. The information is protected in accordance with our Privacy Policy. Your personal information will be used for establishing and maintaining you as an account holder, to facilitate transaction execution and settlement, registration of your holdings of financial products, and to provide other related services to you through your adviser. If you choose not to provide the personal information requested, we may be unable to provide some or all of the services required. We are obliged to confirm and record your identity in accordance with legislation including the Corporations Act and AML/CTF Act. Consequently, you must notify us immediately of changes to personal information; eg. change of address.

Your Personal Information will only be disclosed internally within HALO and third party service providers in accordance with our Privacy Policy and as required by law. Please refer to our Privacy Policy statement which is available at [www.halo-technologies.com](http://www.halo-technologies.com) or can be sent directly to you via email or post on request.

## Recording telephone conversations

You acknowledge that HALO and our representatives may record telephone conversations between us. If a dispute arises between you and HALO or its representatives, you have the right to listen to any recording of those conversations, if recorded. Please contact [hello@halo-technologies.com](mailto:hello@halo-technologies.com) for more information.