Purpose of this Financial Services Guide

The purpose of this Financial Services Guide (“FSG”) is to provide you with key information about the financial services offered by STA Global Investments Pty Ltd, trading as “Markets.com Australia” (“STA; “Markets.com Australia”, “we”, “our” or “us”) to help you in making an informed decision about whether to use our services.

When we use the term “you” or “Client” we mean you, as the user of our services and our other clients if the context requires.

This FSG has important information about STA including information about:

- Who we are;
- The STA documents you should read;
- What types of financial products and services STA offers;
- Details on how you can instruct us in relation to our products and services;
- How STA and our associates are remunerated;
- Any associations or relationships we may have with financial product issuers and details of any potential conflicts of interest;
- What STA’s internal and external complaints handling procedures are and how you can access them;
- Our compensation arrangements;
- The privacy of all the personal information you provide to us; and
- How to contact STA.

Who we are

STA is an Australian incorporated company founded in 2012 and we are a financial services company. We hold an Australian Financial Services Licence (No. 424008) and are regulated by the Australian Securities and Investments Commission.

Our Documents

The Account Terms of Business, this FSG and our Product Disclosure Statement (“PDS”), contain important information about the financial products we offer and govern the terms of our relationship with you.

You may also receive one or more PDS documents prepared by us. The PDS contains information about the products we offer, including any relevant terms, significant risks and details of other fees and charges which may apply. The
PDS will be provided to assist you in making an informed decision about the products we offer. We have prepared a separate PDS for each of our financial products. The PDS can be accessed via our website or by contacting us and asking for a copy. A PDS will be provided to you at no charge. 

Please read all of these documents as they provide you with important information about the risks and costs that are associated with the financial products we offer.

STA is authorised by its Australian Financial Services Licence ("AFS Licence") to provide the following financial services to both retail and wholesale clients:

- Provide financial product advice for the following classes of financial products:
  - Derivatives;
  - Foreign exchange contracts;

- Deal in a financial products by issuing, applying for, acquiring, varying or disposing of the following financial products in respect of the following classes of financial products:
  - Derivatives;
  - Foreign exchange contracts;

- Make a market for the following financial products:
  - Derivatives;
  - Foreign exchange contracts

**Nature of Advice**

We will not provide you with personal financial product advice even though we are authorised to do so by our AFS License. We only provide general financial product advice. Accordingly, we will not give you a Statement of Advice. Personal financial product advice is advice that takes into account your objectives, financial situation and needs or advice which could reasonably be regarded as having done so. General financial product advice is advice which is not personal financial product advice.

Before following any general financial product advice that you have requested from us or that was provided by us, please consider the appropriateness of the advice, with regard to your own personal objectives, financial situation and needs. Also, consider seeking independent advice before making any decisions about using the services and products offered by STA.

**How you can instruct us and Online Statements**

You may place orders to deal in our products by using our electronic online trading platform or by telephoning STA’s Trading Desk; unless we tell you that instructions can only be given in a particular way.

If you give instructions (or orders) by telephone, the conversation will be recorded. Telephone orders will be accepted by STA. If we receive any instructions we may ask you to confirm such instructions in writing. We shall be authorised to follow your instructions notwithstanding your failure to confirm them in writing.

You can access your account Statements online at any time via our electronic trading platform. You may also request to receive your Statement monthly or quarterly via email, by providing such a request, in writing, to the STA support department.
● **Our record keeping obligations**

STA will seek to ensure that comprehensive and accurate records of all client transactions and advice provided are properly maintained.

● **Who we act for**

When you trade in our products and we provide you with financial services, we act as principal and not as agent, broker or trustee on behalf of someone else.

When we receive your instructions and execute them, we are the party to the other side of the transaction and the party with whom you are entering a contract as principal.

● **How we are remunerated for the services we provide (costs, fees and charges)**

As part of the Future of Financial Advice (“FoFA”) reforms, holders of an AFS Licence are prohibited from accepting “conflicted remuneration”, subject to certain exemptions. Conflicted remuneration is any benefit given to an AFS Licensee, or its representatives, where financial product advice has been provided to retail clients which, because of the nature of the benefit or the circumstances in which it is given, could reasonably be expected to influence the choice of financial product recommended to clients or the financial product advice given to clients.

STA does not receive or provide conflicted remuneration.

● **Commission**

We may share charges or benefits with our associates, hedging counterparty or other third parties or receive remuneration from them with respect to transactions we enter into with you.

● **Interest**

STA places client moneys into our Client Trust Accounts. STA does not pay any interest to its clients.

● **Rollovers**

When you hold a position open overnight, you are charged, or receive, a “rollover fee/benefit”, a “funding cost/benefit” or a “swap rate” for holding STA products overnight. These charges vary. Our hedging counterparty charges and/or pays STA a “rollover” fee or benefit and STA passes these “rollover” charges and benefits to you.

**Please Note:** Our Trading Platform calculates overnight rollover at 07:00am AEST and the rollover charge/benefit is debited or credited to and from your account. On Thursday at 07:00am AEST, overnight rollover fees are multiplied by three (x3) in order to compensate for the upcoming weekend.

The overnight rollover values for a particular product can be seen in the Instruments window on the trading platform.

Rollover values will differ depending on whether the position held is short or long. All rollover values are per single contract and the final rollover charge or benefit will be for the total amount of contracts held in a position.

For examples of how “rollover fee/benefit” is calculated we refer you to our website.
● Administrative Fees
With respect to telegraphic transfers or wire fees, STA does not charge a fee for setting up your account or for the deposit or withdraw of funds. However, banks or other third party credit institutions you use to transfer funds may charge a fee. If you request a wire transfer from STA to you, any fees incurred by STA will be passed on to you.

● Inactive and Dormant Account(s)
Any account(s), held with STA where you have:
• not placed an order to enter into a transaction;
• not opened or closed out any transactions; and/or
• not made a deposit into the account;
  for a period of 90 days and more, shall be classified by STA as an inactive Account ("Inactive Account").
Such Inactive Accounts will be subject to a monthly charge of $5, relating to the maintenance/administration of such Inactive Accounts. Any Inactive Accounts, which hold zero balance, shall be considered dormant accounts ("Dormant Account"). For re-activation of Dormant Accounts please refer to the information in the PDS.

● Credit Card Fees
STA does not charge a fee for credit card deposit or withdrawal transactions. However, banks or other third party credit institutions used by you for the transfer of funds may charge a fee. If you use a credit card to deposit or withdrawal fund, any fees incurred by STA will be passed on to you.

● GST and other Taxes
You are responsible for any stamp duty; transaction duty; GST or similar goods and services; or value added tax, payable in respect of services provided to you or any transaction made.

● How Employees and Directors of STA are remunerated
All STA employees and directors are paid by way of salary and other employee benefits.
Employees of STA, who provide you with advice and execution services, may receive remuneration for the provision of these services. Any “bonus” remuneration is discretionary and is assessed as part of the overall success of the business. No adviser is remunerated for providing specific advice that may result in one financial product being recommended over another.
Our employees may also qualify for non-monetary benefits if they meet performance targets. Incentives include non-monetary rewards such as sports tickets and attendance at conferences. The type of these benefits will vary depending on particular circumstances, such as the employee’s position and the particular service provided. We maintain a register of any benefits that our representatives receive.

● Business Relationships
We have commercial arrangements with our hedging counterparty provider. Safecap Investments Limited is authorised and regulated by the Cyprus Securities and Exchange Commission under license number 092/08. Safecap Investments Limited is a member of the European Union Financial Services Regulators, and is registered with all major EU regulators (e.g. UK’s Financial Conduct Authority and the German Federal Financial Supervisory Authority.

Safecap Investments Limited provides us with support in relation to liquidity, risk management and other services. All arrangements with Safecap Investments Limited are governed by formal agreements between us. The fees and charges that you pay to STA may ultimately benefit other companies we have commercial arrangement with.

- **Associations or relationships we may have with financial product issuers**

  We do not have any relationships or associations with financial product issuers which might influence us in providing you with our services. STA is the issuer of the financial products it offers.

- **Complaints Handling**

  We want to know about any problems or concerns you may have with our services so we can take steps to resolve the issue. We have internal and external dispute resolution procedures to resolve complaints from clients.

  Initially, all complaints will be handled and investigated internally. Should you feel dissatisfied with the outcome, you have the ability to escalate your concerns to an external body for a resolution.

  If you have a complaint about the financial services provided to you, please take the following steps:

  - Contact STA to inform us about your complaint. You may do this by telephone, facsimile, email or letter. We will investigate your complaint promptly and will try to resolve your complaint quickly and fairly.
  - If you are dissatisfied with the outcome of our investigation, you have the right to complain to the Financial Ombudsman Service Limited (“FOS”) who may be contacted on 1300 780 808 (Web: www.fos.org.au) or in writing at GPO Box 3, Melbourne VIC 3001.
  - STA is a member of this complaints resolution scheme and our membership number is 30820.
  - In order for a complaint to be considered by FOS, the claim must be no more than $500,000.
  - You can contact ASIC on 1300 300 630. This is another alternative that you may use to make a complaint and obtain information about your rights.

  A copy of the “Summary of Complaints Handling Procedures – Information for Clients” is available upon request.

- **Privacy**

  In accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, STA has an obligation to collect information about and verify the identity of its clients. This information is referred to as Know Your Client (“KYC”) information. STA will carry out its customer identification and verification procedures in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, the Privacy Act 1988 and the National Privacy Principles.
We value the privacy of the personal information you provide us. When we collect, use, disclose or handle your personal information, we are bound by Australian law. Our full privacy policy is available on our website Markets.com Australia. If you want access to, or wish to correct or update any personal details that you have provided to us, please do so as soon as possible.

**Our Professional Indemnity Insurance Arrangements**

STA has professional indemnity ("PI") insurance arrangements in place as required under section 912B of the Corporations Act. Our PI insurance takes into account the volume and nature of our business, the number and nature of our clients, our representatives and the potential extent of our liability.

Our PI insurance also covers potential 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).

**Our Contact Details**

**Contact Us**

You can contact us by the following means:

- Telephone +61 2 6145 2020
- Mail: Level 29, 66 Goulburn Street, Sydney NSW 2000, Australia
- Fax: +61 2 6145 2016
- Email: support@Markets.com Australia
- Visit our web-site at: www.Markets.com Australia