



**WALKER CAPITAL**

## **Walker Capital Australia Alternative Fund Financial Services Guide**

Walker Capital Australia Alternative Fund ARSN 646 309 631  
Gleneagle Asset Management Limited ABN 29 103 162 278  
Australian Financial Services Licence No 226199

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# THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) was prepared and issued on 18 December 2020 by:

Gleneagle Asset Management Limited ABN 29 103 162 278 Australian Financial Services Licence (AFSL) Number 226199 (**Gleneagle Asset Management**).

It describes the financial services provided by the Corporate Authorised Representative, Walker Consulting (Australia) Proprietary Limited ACN 602 952 116 (C.A.R. No. 1250196) (**Walker Capital**) in relation to the **Walker Capital Australia Alternative Fund ARSN 646 309 631 (Fund)**.

## WHAT IS THE PURPOSE OF THIS FINANCIAL SERVICES GUIDE?

The purpose of this FSG is to provide clients of Gleneagle Asset Management with information about the financial services that are provided by Gleneagle Asset Management by its representative, Walker Capital. It is designed to assist you in deciding whether to use the financial services described in this FSG.

## WHAT THIS FSG CONTAINS

This FSG contains information about:

- who provides the services and how the service provider can be contacted
- the services and types of products the service provider are authorised to provide
- how the service provider (and any other relevant parties) are remunerated
- internal and external dispute resolution procedures and how you can access them.

The FSG is issued in paper form and also as an electronic copy of this FSG (**Electronic FSG**). The Electronic FSG will be available via <https://alternatifund.com.au>. Potential investors should only rely on the information in this FSG for the services covered by this FSG. If this FSG has been received electronically, then a paper copy of this FSG will be provided free of charge on request by contacting Walker Capital using the contact details detailed in this FSG.

## WHO PROVIDES THE SERVICE?

Gleneagle Asset Management is the responsible entity of Fund which is a registered managed investment scheme (ARN 646 309 631).

Gleneagle Asset Management acts for itself.

Walker Capital has been appointed by Gleneagle Asset Management as the investment manager for the Walker Capital Australia Alternative Fund to promote, invest and manage the Fund. Walker Capital acts as the authorised representative of Sanlam Private Wealth Pty Ltd (ACN136 960 775, AFSL No. 337927) when it provides to you the services described in this FSG.

## WHAT OTHER DOCUMENT MIGHT BE GIVEN TO YOU?

You should receive a Product Disclosure Statement, named Walker Capital Australia Alternative Fund (PDS) is dated 21 December 2020 and is issued by Gleneagle Asset Management for Fund. That discloses important information about investing in Fund.

The disclosure documents will be issued in paper form and as an electronic Product Disclosure Statement (**Electronic PDS**). The Electronic PDS will be available via <https://alternatifund.com.au>. Potential investors should only rely on the information in the PDS for information about investing in Fund. If the PDS have been received electronically, then a paper copy of the PDS will be provided free of charge on request by contacting Walker Capital using the contact details detailed in this FSG.

## WHAT ARE THE FINANCIAL SERVICES PROVIDED?

Gleneagle Asset Management is authorised by its AFSL to provide a range of financial services. For the purposes of this FSG, the services provided by Walker Capital as corporate authorised representative of Gleneagle Asset Management are limited to:

- providing general financial product advice only; and
- dealing in a financial product by applying for, acquiring, varying or disposing of a financial product on behalf of another person, with respect to interests in Fund, to retail clients and wholesale clients.

Neither Gleneagle Asset Management nor Walker Capital does not provide personal advice.

## GENERAL ADVICE ONLY

Any advice given by any representative of Gleneagle Asset Management or Walker Capital is general advice only.

Gleneagle Asset Management does not give personal advice of any kind and has not authorised anyone to give personal advice.

Under the law regulating provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether generally or for a class or kind of investor, without taking into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions) and any such general advice is provided without any express or implied recommendation that such advice is appropriate for you in light of your personal circumstances. Regular updates, marketing materials, research reports, market reports, PDSs or other offer documents and website content are not personal advice.

Gleneagle Asset Management and Walker Capital may collect personal or investment information from you to identify you, or for marketing purposes and to administer your account and our credit exposure to you. Collection of personal information is not to be implied that personal advice is given.

## **WHO IS RESPONSIBLE FOR THE FINANCIAL SERVICES PROVIDED?**

Both Walker Capital and Gleneagle Asset Management are responsible to you for any financial services which Walker Capital provides to you which are within the authority given to Walker Capital.

Gleneagle Asset Management is responsible for the conduct of its appointed representative, Walker Capital.

## **HOW CAN YOU CONTACT THE SERVICE PROVIDERS?**

All your regular contact in relation to Fund should be with Walker Capital. The contact details are given in the directory of this FSG.

If you have any complaints or queries about our service covered by this FSG, then you should follow the procedure described later in this FSG. (If you have any complaints or queries about the investments in Fund, then you should consult the PDS.)

You should give any instructions or communications to us or to Walker Capital by telephone, letter, and email or in person.

## **HOW THE SERVICE PROVIDER (AND ANY OTHER RELEVANT PARTIES) ARE REMUNERATED**

There are no fees, charges or costs for the services covered by this FSG.

Gleneagle Asset Management may receive fees, charges or recovery of expenses in its role as responsible entity of Fund, which are disclosed in the PDS.

Gleneagle Asset Management and its associates have relationships with various parties whereby it pays fees or receives fees including on its personal account. These parties may include (but are not limited to) product issuers, brokers, custodians, fund managers, banks, investment advisors, financial planners and other referral sources.

Gleneagle Asset Management has a policy and documented processes for controlling, avoiding and disclosing relevant conflicts of interests for managing conflicts of interest that covers related party transactions and benefits or other remuneration from third parties.

Employees or authorised representatives of Gleneagle Asset Management may be remunerated through a combination of base salary and non-base salary compensation.

The non-base salary may include a share of the commission, fees or other payments earned by the company (or an associate of it).

The proportion of commission, fees or other payments shared with the employee or other representative is based on their level of experience, length of service with the respective company or its associate, the level of qualifications and market conditions, and ranges from 0% up to 50%. Employees and other authorised representatives of those companies may also benefit from various internal incentive schemes including seminars, conferences and training programmes and non-cash rewards. Participation in these schemes is generally based on revenue production, minimum length of service and compliance with policies and industry regulations.

Since there are no fees charged for the services covered by this FSG, the remuneration and other benefits are funded from other sources, some of which may be fees, charges and costs disclosed in the PDS.

## **PROFESSIONAL INDEMNITY INSURANCE**

Gleneagle Asset Management has the benefit of professional indemnity insurance that complies with section 912B of the Corporations Act 2001. This professional indemnity insurance covers claims in relation to the conduct of current employees and past employees working for it and for its representatives.

## **HOW IS MY PERSONAL INFORMATION DEALT WITH?**

Your privacy is important to Gleneagle Asset Management and Walker Capital are committed to compliance with the Privacy Act 1998 (Commonwealth) and the National Privacy Principles. Gleneagle Asset Management maintains a record of your personal profile which includes your personal details and details of your investments.

Gleneagle Asset Management and Walker Capital may disclose your personal information to external parties, such as our financial service providers, for the purposes of arranging/facilitating your investments or transactions or with your consent.

Gleneagle Asset Management and Walker Capital may also collect, hold and use your personal information to undertake appropriate administration, including in relation to the "Know Your Client" obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Commonwealth) (AML/CTF Act).

If you wish to access information which Gleneagle Asset Management or Walker Capital hold about you, please first contact Walker Capital to request this. Gleneagle Asset Management will also try to assist you, if requested.

A copy of the Gleneagle Asset Management Privacy Policy is available from Gleneagle Asset Management. Please contact Gleneagle Asset Management if you have any concerns.

## ANTI-MONEY LAUNDERING

Gleneagle Asset Management has adopted a programme that complies with the AML/CTF Act. As part of this process, you will need to provide evidence of identification.

## DISPUTE RESOLUTION

Walker Capital wants to know about any problems you may have with the service of Gleneagle Asset Management and Walker Capital so we can take steps to resolve the issue. If you have a complaint about the financial product or service provided to you, please take the following steps:

1. Contact Gleneagle Asset Management compliance division. You may do this by telephone, email or letter using the contact details below:

Gleneagle Asset Management Limited  
Compliance Division  
Level 27, 25 Bligh Street  
Sydney NSW 2000  
AUSTRALIA  
Phone: +61 2 8277 6655  
[info@gleneagle.com.au](mailto:info@gleneagle.com.au)

2. Gleneagle Asset Management will acknowledge the complaint immediately, or if not, as soon as practicable after receipt. Gleneagle Asset Management will endeavour to resolve any complaint and provide a final response as soon as practicable, but within 45 Business Days from receipt.
3. If you still do not get a satisfactory outcome, you have the right to complain to the Australian Financial Complaints Authority (**AFCA**). AFCA is an external complaints and dispute resolution body. The service to you is free. The contact details for AFCA are:

Australian Financial Complaints Authority  
G.P.O. Box 3, Melbourne VIC  
3001  
Toll Free: 1800 931 678 (free call)  
Facsimile: +61 1800 931 678  
Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)

4. Gleneagle Asset Management - membership number 11357;
5. The Australian Securities and Investments Commission (ASIC) also has an Infoline on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

## RECORDING OF TELEPHONE CONVERSATIONS

Each of Gleneagle Asset Management and Walker Capital may record conversations with you (with or without an audible tone). You may request a copy of the transcript of these recordings in anticipation of or in the event of a dispute. We may charge a reasonable administrative cost for providing this service.

## DIRECTORY

If you have any queries about this FSG or the services provided, you can contact

### INVESTMENT MANAGER

Walker Consulting (Australia) Proprietary Limited trading as "Walker Capital Australia"  
ACN 602 952 116  
Corporate Authorised Representative (No. 1250196)  
Website: <https://alternativefund.com.au>  
Phone: +61 2 8076 2210

### RESPONSIBLE ENTITY

Gleneagle Asset Management Limited  
ACN 103 162 278  
AFSL 226199  
Website: [www.gleneagle.com.au](http://www.gleneagle.com.au)

#### Sydney Office:

Level 27, 25 Bligh Street  
Sydney NSW 2000  
AUSTRALIA