



KVB Kunlun  
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## FINANCIAL SERVICES GUIDE

### 1. Issue Date

1 November 2018

### 2. Purpose and Contents of this Financial Services Guide ("FSG")

This FSG is designed to provide you with important information regarding our services prior to providing you with a financial service, including the following:

- Who we are & how you can contact us
- What services we are authorised to provide
- How we are remunerated for these services
- Any (potential) conflicts of interest we may have; and
- Our dispute resolution process.

If you would like further information, please ask us.

### 3. Name of Service Provider

The Service Provider is KVB Kunlun Pty Ltd ACN 101 829 467 ("KVB Kunlun").

### 4. Australian Financial Services Licence ("AFSL") authorisations & services provided

KVB Kunlun holds an AFSL [Number 226602] and is authorised to provide personal and general advice, and dealing services to retail and wholesale clients in relation to the following products:

- Basic and non-basic deposit products.
- Derivatives.
- Foreign exchange contracts.
- General insurance products.
- Debentures, stocks and or bonds issued or proposed to be issued by a government.
- Life products including investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;

and life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds.

- Interests in managed investment schemes including investor directed portfolio services.
- Retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997).
- Securities.
- Superannuation.

We are also authorised to deal (issue) and make a market in derivatives and foreign exchange contracts to retail and wholesale clients.

### 5. Contact details

#### KVB Kunlun Pty Ltd

Level 33, Governor Macquarie Tower  
1 Farrer Place, Sydney NSW 2000 Australia

Tel: +61-2-8263-0188

Fax: + 61-2-8263-0189

Email: [info@kvbkunlun.com](mailto:info@kvbkunlun.com)

### 6. Nature of Advice provided

KVB Kunlun offers clients general advice & trading services in relation to margin foreign exchange and contracts for difference over commodities and indices (both of which are over-the-counter derivatives).

KVB Kunlun also offers personal advice services in relation to a wide range of products for wealth management clients. We offer comprehensive financial planning services and access to a wide range of financial products.

When we provide you with personal advice which takes into account your financial situation, objectives and needs you will receive a Statement of Advice ('SoA'). We are required to have a reasonable basis for our advice and to act in your best interests when providing you with personal advice.



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The SoA will contain the advice, the underlying basis for our recommendations and information regarding commissions, fees or associations with third-parties that may influence that advice.

We may also provide you with a Record of Advice ('RoA') where further advice is sought in relation to that provided in the SoA and where there is no significant change to your circumstances.

A Fee Disclosure Statement, which contains information about the services you are entitled to receive and actually received, and the fees paid, may also be provided to you where you pay an ongoing fee for a period of more than 12 month.

If we recommend a specific product (except securities) we will also provide you with a Product Disclosure Statement (PDS) relevant to that specific product that will contain information to enable you to make an informed decision regarding the key risks and benefits of utilising that product.

The advice and recommendations provided will be impacted if you provide us with incorrect, incomplete or limited information.

Where you wish to transact in over-the-counter ("OTC") derivatives and foreign exchange contracts, we will only provide you with general advice. Accordingly, we are obliged to warn you that our general advice provided to you as a retail client does not take account of your personal objectives, financial situation or needs.

Therefore, we recommend that you take all reasonable steps to fully understand the outcomes of specific products and strategies adopted in relation to utilising the services provided by KVB Kunlun on a general advice basis.

While KVB Kunlun believes the general advice and information we provide is accurate and reliable, neither KVB Kunlun nor their directors, representatives, officers, employees, contractors or associates assume any responsibility for the accuracy and completeness or currency of that advice and information.

KVB Kunlun will not be responsible for any loss arising from any investment based on a perceived recommendation. Notwithstanding anything to the contrary (not even if specifically stated), no publication (including possible recommendations) shall be construed as a representation or warranty (either express nor implied) that the client will profit from trading in accordance with a trading strategy or that the client will not sustain losses from trading in accordance with a trading strategy set forth in a publication.

#### **7. Method of providing financial services**

Our derivatives trading services are provided via an on-line trading platform. Our financial planning/wealth management advisory services are provided face-to-face, by telephone and/or email. Other methods may be agreed from time to time at the sole discretion of KVB Kunlun.

#### **8. Documentation**

KVB Kunlun will provide clients with the Client Services Agreement, and transaction confirmations (via the trading platform) to facilitate the provision of any general advice and all transactions. We will also provide you with a Product Disclosure Statement prior to investing in any derivatives products, which contains important information regarding the features, benefits, risks and fees applicable, and should be read carefully to enable you to make an informed decision prior to investing.

KVB Kunlun is also able to provide clients with comprehensive or scaled personal advice and portfolio reviews regarding wealth creation and accumulation, wealth protection, superannuation and/or asset allocation. You will receive a documented agreement regarding the nature of our services, frequency of contact, our fees and charges, and how such arrangement can be terminated.

As per section 6 herein, clients who KVB Kunlun has agreed to provide personal advice, will receive a Statement of Advice, any relevant PDSs, and any additional applicable disclosure statements.



Please note that we do not provide estate planning, taxation and government benefits advice, nor do we provide managed discretionary services.

#### **9. Professional Indemnity Insurance**

In compliance with s912B of the Corporations Act and ASIC RG 126, we maintain professional indemnity insurance in connection with the financial products and services we provide, including any claims in relation to the conduct of our former representatives/employees.

#### **10. Our record-keeping obligations**

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

#### **11. Who do we act for?**

KVB Kunlun is responsible for the financial services provided to you under its Australian Financial Services Licence, and does not act on behalf of any other financial services licensee.

KVB Kunlun is considered to be market makers, not an agent, when dealing in over-the-counter derivatives such as Contracts for Difference. Accordingly, KVB Kunlun act as principal in all transactions with you in respect of these specific financial products.

#### **12. Remuneration, commission & benefits expected to be received by KVB Kunlun for provision of our financial services**

In relation to OTC derivatives trading, KVB Kunlun earns its income from the business spread (or margin) that we apply to our products. This is the difference between the rate at which we buy and sell the financial instruments (i.e. between the wholesale price achieved by KVB Kunlun and your trade price). This spread is incorporated into the rates quoted to you and is not an additional charge or fee payable by you. These spreads will differ depending on the contracts traded.

Details of any fees and charges are set out in the PDS and are also available on our website at [www.kvbkunlun.com](http://www.kvbkunlun.com)

If you hold a position open overnight, we charge a Swap Fee. This is the differential between the cost of funds in one currency versus the cost of funds of the other currency in the pair you are trading.

For Mini account trading, we may charge a commission which ranges from \$0-\$20 USD per standard lot.

External institutions that KVB Kunlun may deal with may also charge their own fees which can include spread costs, bank charges, brokerage clearing charges and fees relating to execution of the trading contracts. We may receive fees, rebates or other direct or indirect benefits from related parties and third parties.

In relation to our financial planning/wealth management advisory services, you pay for the service through the fees and charges paid to KVB Kunlun. You will also pay for the cost of acquiring a product issued by a third party financial product issuer (the issuer).

KVB Kunlun is remunerated through the fees charged directly to you and commissions paid, where permissible, by issuers or other service providers in connection with advice given to you and executing transactions on your behalf. If necessary, this commission may be paid at your direction. The nature of the fees and commissions will depend on the type of service and the complexity of your transaction.

Fees may include a personal advice fee and/or ongoing annual management fee. In addition, KVB Kunlun may, where permissible, receive rebates from certain product issuers and administration service providers. These amounts may be based on the total funds placed and may be paid out of fees charged by the issuer/administration service provider.

KVB Kunlun may, where permissible, also receive marketing rebates, sponsorship payments or non-monetary benefits, such as market reports, briefings, training and sales material from issuers with whom investments and insurance policies are placed.



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These rebates do not represent a direct additional cost to you. Full details of fees and commissions (and/or the method of calculation) relevant to the financial advice or service we provide you with will be included in the SOA or as soon as practicable after that time.

Representatives of KVB Kunlun who provide you with general advice or transaction execution may receive commissions or other remuneration for the provision of these services. Our employees may also receive salaries, performance bonuses, team achievement bonuses and other benefits from us.

### 13. Disclosure of any relevant conflicts of interest

Subject to disclosures in any Product Disclosure Statement or other transaction documents, we do not have any relationships or associations which might influence us in providing you with our services.

### 14. Dispute Resolution

KVB Kunlun has an internal dispute resolution process in place to resolve any complaints or concerns you may have, as quickly and fairly as possible in all the circumstances. Any complaints or concerns should be addressed to your KVB Kunlun representative at first instance.

Alternately, or if you are dissatisfied with their response, please detail your complaint in writing and direct it to the Compliance Officer and forward to the address detailed herein.

The Compliance Officer of KVB Kunlun will respond to your complaint within 7 days and seek to resolve your complaint within 45 days or such further time period that may reasonably be required given the nature of the complaint.

If you are dissatisfied with the outcome, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA)

Phone: 1800 931 678

Website: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

In writing: GPO Box 3, Melbourne VIC 3001

AFCA is an approved external dispute resolution scheme, of which KVB Kunlun is a member.

### 15. Privacy

Your privacy is important to us and we are committed to compliance with the Privacy Act and the Australian Privacy Principles. We may disclose your personal information to external parties who act on our behalf in the operation of our business or in connection with the transactions to be undertaken. Such external parties are required and committed to protecting your privacy and where they are offshore we take reasonable steps to ensure that to the maximum extent reasonably possible any information sent has the same level of privacy protection as we provide here in Australia. KVB Kunlun will not otherwise disclose your personal information without your consent, except as authorised or required by privacy laws. Please contact us via the email provided if you have any concerns.