



Atlas
Wealth Management



Financial Services Guide

Version 10.2

Atlas Wealth Management Pty Ltd

Atlas Wealth Management (DIFC) Limited

Purpose of this Financial Services Guide

The Financial Services Guide (FSG) is an important document which is designed to assist you in deciding whether to use any of the financial services we offer. This FSG includes the following:

- Our name and contact details
- The financial service we can provide
- The financial products we can offer
- Our professional indemnity insurance
- How we use your personal information and your privacy
- How complaints are handled
- The cost of any services we provide
- Any remuneration, fees or other benefits that we may be paid
- Any relationships we have with any other organisations.

The matters covered by the FSG include how we are remunerated, and details of our internal and external dispute resolution procedures. Throughout this FSG, Atlas Wealth Management (**AWM**), Atlas Wealth Management Pty Ltd (**AWM AUST**) and Atlas Wealth Management (DIFC) Limited (**AWM DIFC**) is referred to as “we”, “us”, “our” or any variations.

The term “adviser” refers to AWM Authorised Representatives.

About Atlas Wealth Management

Atlas Wealth Management (AWM) is widely recognised as a specialist in the provision of financial advice to the Australian expatriate community.

With clients in over 30 countries we have built an enviable reputation in this field which is supported by an extensive library of knowledge when it comes to cross and multi-jurisdictional financial advice.

Atlas Wealth Management comprises of two companies:

- **Atlas Wealth Management Pty Ltd (AWM AUST)** ABN 98 152 187 098, is a privately-owned advisory company that holds its own Australian Financial Services License (AFSL 471 653) and is regulated by the Australian Securities & Investments Commission (ASIC).

AWM AUST is not affiliated with any public or non-public corporation.

AWM AUST holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act.

Lack of Independence Disclosure Notice

Atlas Wealth Management Pty Ltd (AWM AUST) can't call ourselves independent and here's why.

The law makes it very difficult for most advisers to say they are independent, unbiased or impartial, even if they are not in any way linked to a financial product provider (like a bank). If, for example, an adviser gets paid a commission to help a client arrange some insurance they are automatically prohibited from calling themselves independent. Most advisers who receive those commissions charge their clients very little (if anything) for the advice or the help they provide putting a policy into place. From time to time we receive these commissions.

So, although we always put your interests before ours when giving advice we cannot (by law) call ourselves independent, unbiased or impartial.

- **Atlas Wealth Management (DIFC) Limited (AWM DIFC)**, trading as Atlas Wealth Management, is a wholly owned subsidiary of Atlas Wealth Management Pty Ltd.

AWM DIFC is registered with the Dubai International Financial Centre (DIFC), licence no. 3354, and is regulated by the Dubai Financial Services Authority (DFSA) no. F005228.

The registered office is Office 704, Level 7, Tower 2, Al Fattan Currency House, Dubai International Financial Centre, PO Box 507298, Dubai, United Arab Emirates.

In respect of those activities AWM DIFC performs in or from the DIFC, the law applicable to these activities is that of the DIFC.

AWM DIFC is a Corporate Authorised Representative of Atlas Wealth Management Pty Ltd.

Documents That You May Receive from Us

When your adviser provides personal financial advice to you, you may receive one or more of the following documents:

Statement of Advice (SoA)	The SoA will set out the advice that has been tailored to your specific circumstances and provide you with details of all relevant disclosures including details of any remuneration payable.
Record of Advice (RoA)	The RoA may be provided in situations where further advice is provided. The SoA and RoA streamline the documentation process by avoiding unnecessary duplication of information already provided in previous advice documents.
Product Disclosure Statement (PDS)	A PDS will be provided if a product recommendation is made and includes detailed information on the financial product including features, benefits, conditions, costs and cooling off rights (if applicable).
Fee Disclosure Statement (FDS)	An FDS will be issued to you in instances where you enter into an Ongoing Fee Arrangement with your adviser for a period greater than 12 months. The FDS will contain information about the services you were entitled to receive, the services you actually received and the fees you paid during the period.

You may request in writing a copy of any advice document up to seven (7) years after the advice has been given. If you have any questions about this FSG or the financial advice please contact your adviser.

Communication for Instructions

You may provide us with instructions by telephone, in person, email, letter, fax or any other method as agreed with your adviser. Should your instructions be provided in writing then an acknowledgment via email will be provided to you from your adviser.

Your adviser is required to maintain a physical or electronic record of your personal information, which includes details of your relevant personal and financial circumstances. Your adviser is also required to maintain records of documentation for any financial advice given to you in the course of taking instructions from you, as well as any advice documents your adviser has provided to you.

These records are required to be retained for at least seven (7) years.

Financial Services & Products That We Can Provide

Atlas Wealth Management Pty Ltd (AWM AUST) is authorised to provide advice and deal in the following financial services and products:

- Deposit and payment products limited to:
 - basic deposit products;
 - deposit products other than basic deposit products;
- Derivatives;
- Debentures, stocks or bonds issued or proposed to be issued by a government;
- 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;
- Standard margin lending facility; and
- Superannuation; and

Atlas Wealth Management (DIFC) Limited (AWM DIFC), is a Corporate Authorised Representative of Atlas Wealth Management Pty Ltd. AWM DIFC is authorised to conduct the following financial services by the Dubai Financial Services Authority (DFSA):

- Advising on Financial Products
- Arranging Credit and Advising on Credit
- Arranging Deals in Investments
- Arranging Custody

Ethics & Conflicts of Interest

Atlas Wealth Management (including AWM AUST and AWM DIFC) look to identify and prevent or manage any conflicts of interest between ourselves as the adviser and you as the client.

An example of how we manage this is that all advisers are paid a salary and the advice provided to you does not influence what they earn as income on a monthly basis.

To ensure that there are no personal conflicts of interest Atlas Wealth Management has a policy whereby advisers are required to seek prior approval for all personal account transactions.

Atlas Wealth Management abides by the Code of Ethics standards that were introduced in Australia on the 1st of January 2020. As part of this framework Atlas Wealth Management must always act to realise and promote the values of:

- Trustworthiness
- Competence
- Honesty
- Fairness
- Diligence

There are 12 standards that have been introduced and these cover the topics of:

- Ethical Behaviour
- Client Care
- Quality Process
- Professional Commitment

Ethical behaviour

Standard 1 - We must act in accordance with all applicable laws, including this Code, and not try to avoid or circumvent their intent.

Standard 2 - We must act with integrity and in the best interests of each of our clients.

Standard 3 - We must not advise, refer or act in any other manner where we have a conflict of interest or duty.

Client care

Standard 4 - We may act for a client only with the client's free, prior and informed consent.

Standard 5 - All advice and financial product recommendations that we give to a client must be in the best interests of the client and appropriate to the client's individual circumstances.

We must be satisfied that the client understands our advice, and the

benefits, costs and risks of the financial products that we recommend, and you must have reasonable grounds to be satisfied.

Standard 6 - We must take into account the broad effects arising from the client acting on your advice and actively consider the client's broader, long-term interests and likely circumstances.

Quality process

Standard 7 - The client must give free, prior and informed consent to all benefits we will receive in connection with acting for the client, including any fees for services that may be charged.

We must satisfy our self that any fees and charges that the client must pay to us, and any benefits that we receive, in connection with acting for the client are fair and reasonable and represent value for money for the client.

Standard 8 - We must ensure that our records of clients, including former clients, are kept in a form that is complete and accurate.

Standard 9 - All advice we give, and all products you recommend, to a client must be offered in good faith and with competence and be neither misleading nor deceptive.

Professional commitment

Standard 10 - We must develop, maintain and apply a high level of relevant knowledge and skills.

Standard 11 - We must cooperate with ASIC and monitoring bodies in any investigation of a breach or potential breach of this Code.

Standard 12 - Individually and in cooperation with peers, we must uphold and promote the ethical standards of the profession and hold each other accountable for the protection of the public interest.

Which Office and Regulations Apply to Me?

Our regulatory straplines that are on formal documents provided to you (including emails, a Statement of Advice and any advisory letters) set out clearly which AWM entity will be servicing your account and which law and regulation is relevant to the entity and the advice and services.

All clients are treated as Atlas Wealth Management Group clients and your contract with us is as a group.

A person is a client and serviced by Atlas Wealth Management Pty Ltd (AWM AUST) if they have received formal documentation from AWM AUST with an AWM AUST regulatory strapline.

A person is a client and serviced by Atlas Wealth Management (DIFC) Limited (AWM DIFC) if they have received formal documentation from AWM DIFC with an AWM DIFC regulatory strapline.

With respect to which entity is providing which service to you as a client we have broken this down below to assist you in understanding which entity is providing which service to you.

Asia Pacific (APAC) region

If you are located in the APAC region and all written communications include the AWM AUST regulatory strapline then all services that AWM AUST is authorised to provide by ASIC on page 5 of this FSG will be delivered to you by AWM AUST.

Europe Middle East & Africa (EMEA) Region

If you are located in the EMEA region and all written communications include the AWM DIFC regulatory strapline then all services that AWM DIFC is authorised to provide by the DFSA on Page 5 of this FSG will be delivered to you by AWM DIFC.

Even though you will be working with a company incorporated in the United Arab Emirates as AWM DIFC is a wholly owned subsidiary of AWM AUST you will be afforded with the same protections as you would be if you were working with an Australian entity.

AWM DIFC is a Corporate Authorised Representative (CAR) of AWM AUST, and that the Professional Indemnity (PI) that AWM AUST holds extends to all subsidiaries owned by the parent company.

This cover also extends to AWM AUST's membership of the Australian Financial Complaints Authority (AFCA) which provides cover to all CAR and Authorised Representatives (AR) which have been nominated under the Australian Financial Services License (AFSL) held by AWM AUST.

AWM AUST, as the parent company of AWM DIFC, will also provide to AWM DIFC clients support services in the ongoing delivery of financial advice. They may include, but is not limited to:

- Paraplanning services - preparation of technical reports, assisting with the statement of advice and technical research;
- Administration & Client Servicing - providing day to day support on your account, liaison with custodians for setting up your accounts;
- Support services – back-office support such as finance and IT support

Sharing of Information

Atlas Wealth Management may share clients' personal data with auditors, professional advisers and those who provide professional services to AWM for client purposes.

Examples of these with respect to the specific Atlas Wealth Management entities include:

- AWM AUST sharing client data to assist with the following:
 - Establishing a foreign exchange account;
 - Obtaining Risk Insurance advice;
 - Obtaining Australian mortgage advice;
 - Those providing storage services for email records and the like; and
 - Those providing cloud storage and processing systems.
- AWM DIFC may share client's personal data with AWM AUST as part of a common IT system.

AWM AUST and AWM DIFC may also share client data with regulators where required by relevant regulations and law, and/or administrative requirements.

This may include the Australian Securities & Investments Commission (ASIC), the Dubai Financial Services Authority (DFSA), and the Australian Financial Complaints Authority (and overseas equivalents).

Your Privacy

Atlas Wealth Management is committed to ensuring the confidentiality and security of the information provided by you to us. We support and embrace the Australian Privacy Principles set out in the Privacy Amendment (Private Sector) Act 2000 as well as the DIFC Data Protection Law DIFC law No 5 of 2020 and the protection afforded by these laws for the security of private information held for clients.

A full copy of our Privacy Policy is available on our website www.atlaswealth.com.

AWM will need to collect copies of your identification to meet our statutory obligations under Australia's Anti-Money Laundering and Counter Terrorism Financing Act 2006 as well as the United Arab Emirates Federal Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organisations if you are working with the AWM DIFC office.

We may request that you provide us with your Australian Tax File Number, however if you choose not to, there may be tax implications for you. If you have any complaints about how we handle your private information, please contact us as set out below.

We take your privacy seriously and will address your concerns through our complaints handling process. If you believe you do not receive a satisfactory resolution to your concerns, you may contact the Office of the Australian Information Commissioner (OAIC). The website of the OAIC is www.oaic.gov.au.

Or for clients of AWM DIFC you may also contact The DIFC Commissioner of Data Protection. Details can be found here: <https://www.difc.ae/business/operating/data-protection/>.

How we are paid for services provided

We believe the services we offer are valuable and the remuneration received is a fair reward for our expertise and skills. We are committed to being open about any benefits or payments we receive and the costs you will incur for using our services.

The cost of providing a financial product or service to you will depend on the nature and complexity of the advice, financial product and/or service provided. Generally, whenever your adviser provides a recommendation for a financial product or service, your adviser may be remunerated through either:

An initial fee for service This fee will be determined by complexity of the advice required. As a guide, our initial advice fee for the preparation of the Statement of Advice ranges from AUD\$2,000 to AUD\$13,000 (excl GST).

An ongoing fee for service To obtain the maximum benefit from your advice you can engage us to provide ongoing services to ensure that you achieve your goals. There are two components to this fee – Adviser Service Fee fixed at AUD\$137.50 per month per person and an Assets Under Management (AUM) fee which is charged at a maximum rate of 1.54% (incl GST). Please note that this is the maximum fee you may be charged by AWM and the fee may be less and will be dictated based on the account size.

Once you sign the Authority to Proceed to receive ongoing advice in the Statement of Advice an account(s) will be opened. Once the account(s) is funded the ongoing fees will commence. These are calculated daily based on the balance of the account and charged monthly in arrears.

Arranging trades Where we are instructed to arrange trades on behalf of our clients there may be a fee charged on the trade that is received by AWM which is compensation for the resources used to arrange this. This fee is no more than 0.275% and will be confirmed with you when the Statement of Advice is provided to you.

Referral fees external providers From time to time we may refer you to one of our partner firms who may provide you with advice in addition to the services that we provide. Please note that AWM AUST and/or AWM DIFC may receive a fee for this referral and that it does not represent an additional cost to you.

A combination of any of the above. All fees and/or commissions are initially paid to AWM AUST and/or AWM DIFC before being distributed to your adviser. AWM AUST and/or AWM DIFC may retain a percentage split which will be outlined in the relevant advice document. Your adviser will provide you with a full explanation of any remuneration arrangements prior to you engaging their services.

Account & Portfolio Management

Whether you choose to engage us to manage your investment and/or superannuation account Atlas Wealth Management has a rigorous and methodical approach to ensuring that not only are your affairs managed in a compliant manner but also to provide you with the peace of mind.

Basis of Advice	Atlas Wealth Management manages clients account on a non-discretionary basis. What this means is that we will only make changes to your portfolio holdings with your prior written consent.
Client Classification	Unless otherwise stated all Atlas Wealth Management clients are classified as Retail investors. Should you prefer to be classified as a sophisticated or professional investor then please speak to your adviser about the steps in arranging this.
Client Notifications	Atlas Wealth Management works with a number of different platform providers and the platform that is recommended to you will be based on what suits your personal circumstances. These platforms will provide notifications on when your statements are ready to download. As a minimum you will receive an annual statement from the platform provider however monthly and quarterly reports can be generated by clients using your login credentials or you can request Atlas Wealth Management to provide you with one.
Account Access	<p>As a client of Atlas Wealth Management you will have access to your account 24 hours a day, 7 days a week. When your account is opened you will receive a email from the platform provider outlining your login details including links, usernames and passwords.</p> <p>Your account login will enable you to view your portfolio, calculate performance of your investments, and prepare reports (e.g. transaction report, cash statement, tax reports etc).</p>
Execution of Trades	<p>When the Atlas Wealth Management Investment Committee makes a recommendation that involves changing the holdings in your portfolio a report will be prepared and emailed to you outlining the recommended changes.</p> <p>As we provide a non-discretionary service you will need to review the recommendations and if you are happy to proceed with the recommendations please reply with your consent.</p> <p>Atlas Wealth Management will always look to provide the best execution of the trades in line with regulatory guidelines.</p>

Complaints

It is important to us that you are satisfied with our services. If you have a complaint about AWM AUST and/or AWM DIFC or are dissatisfied with the services that AWM AUST and/or AWM DIFC provided, you should follow the steps below. We will ensure that your enquiries and complaints are handled efficiently.

AWM AUST Clients

If you are a client of the AWM AUST office and you would like to lodge a complaint, please follow the following steps:

Step 1 – Contact the compliance manager at AWM AUST and advise the details of your complaint by:

Email: australia@atlaswealth.com

Calling on +61 7 55 712 602

Writing to: Compliance Manager
Atlas Wealth Management
Suite 30601, Level 6, Tower 3, 9 Lawson Street,
Southport QLD 4215 Australia

The compliance manager will contact you within 48 hours to notify you of any proposed resolution, additional action or a timeframe if further time is required. We are committed to responding to all complaints with a maximum of 14 days.

Step 2 – If you are not satisfied with the response to your complaint, you may refer the matter to the Australian Financial Complaints Authority (AFCA) of which AWM AUST is a member.

AFCA can be contacted as below:

Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001
Australia
Telephone – 1800 931 678
Email – info@afca.org.au
Internet – www.afca.org.au

AWM DIFC Clients

If you're a client of the AWM DIFC office and you would like to lodge a complaint, please follow the following steps:

Step 1 – Contact the compliance officer at AWM DIFC and advise the details of your complaint by:

Email: dubai@atlaswealth.com

Calling on +971 4 584 4301

Writing to: Compliance Officer
Atlas Wealth Management
PO Box 507298,
DIFC, Dubai, UAE

Step 2 – if you are not satisfied with our response to your complaint you may be entitled to refer your complaint to the Dubai Financial Services Authority.

You may submit a complaint by completing the online complaints form available, on the DFSA website at: <http://www.dfsa.ae/Pages/Complaints/Complaints.aspx>.

If you do not have access to a computer then you may submit a complaint to the DFSA via facsimile to +971 4 362 0801.

Additionally, you may also send your complaint in writing, by sending it to the DFSA attaching relevant documents and information. Complaints must be addressed to DFSA Complaints, PO Box 75850, Dubai. The DFSA will only consider complaints submitted in writing.



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www.atlaswealth.com

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