Wholesale Broking Solutions Pty Ltd

Financial Services Guide

Australian Markets Trading

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www.wholesalebroking.com

Wholesale Broking Solutions.

Lack of Independence - Important Notice

Wholesale Broking Solutions Pty Ltd (WBS) is not independent, impartial, or unbiased within the meaning of s923A of the Corporations Act 2001 (Cth).

WBS is remunerated through brokerage commissions and fees charged to clients. Because WBS's income is derived from these fees and commissions, WBS is unable to describe itself as "independent", "impartial" or "unbiased."

This does not affect the quality, speed, or fairness of WBS's execution and broking services, or WBS's obligation to deal with clients honestly and in their best interests.

About Us

BR Securities Australia Pty Ltd (**BR**) is the holder of Australian Financial Services Licence (**AFSL**) number 456663.

Wholesale Broking Solutions Pty Ltd (**WBS**), ABN 41 643 105 999, is an Authorised Representative (CAR No. 001282970) of BR Securities Australia Pty Ltd (AFSL 456663).

This FSG is issued by Wholesale Broking Solutions Pty Ltd acting in its capacity as Authorised Representative (CAR No. 001282970) of BR Securities Australia Pty Ltd (AFSL 456663). WBS provides these services as representative of, and on behalf of, BR Securities Australia Pty Ltd. References in this FSG to ‘we’, ‘us’ or ‘our’ refer to WBS in that capacity.

This Financial Services Guide (FSG) is designed to assist you in deciding whether to use WBS's services. It covers:

- who we are and the services we offer
- what financial services and products we are authorised to provide
- how your personal information is handled
- how we transact with you
- how we are paid and potential conflicts of interest
- our complaints process and compensation arrangements

Contact Details

BR Securities Australia Pty Ltd

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Wholesale Broking Solutions Pty Ltd

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Financial services described in this FSG are provided by BR Securities Australia Pty Ltd (AFSL 456663). Wholesale Broking Solutions Pty Ltd (WBS) acts as a Corporate Authorised Representative of BR Securities and is authorised to provide those services on its behalf.

Supervision of Authorised Representatives

BR Securities Australia Pty Ltd (**BR Securities**) is responsible for supervising the financial services provided by WBS and ensuring compliance with the Corporations Act 2001 (Cth).

Our Services

Through BR Securities, WBS provides access to Australian financial markets. We offer a comprehensive suite of services, serving broker-dealers, institutional investors, wealth managers, family offices, and corporate clients. The table below summarises our service lines:

Service Line	Key Capabilities
Broking Solutions	Broker-in-a-box: clearing, platforms (Equix/IRESS), white labelling, AFSL access, compliance, digital onboarding, back office administration
Wealth Solutions	Wealth trading software for advisers and end clients; sponsored HINs, bulk/suspense accounts; Bloomberg, IRESS, Refinitiv integration
Institutional Solutions	Buy-side trading via Bloomberg/IRESS, bulk/suspense accounts, short selling, Omgeo CTM/IRESS ETC settlement, DVP with custodian, API integration, smart order routing
Corporate Solutions	Capital markets: placements, capital raises, commercial arrangement with Complii Fintech Solutions Ltd for its Corporate Highway product for primary and secondary market access
Family Office Solutions	Multi-generational wealth management: discretionary portfolio management, tailored reporting, family governance, estate planning support

WBS primarily provides financial services to wholesale clients. Retail clients may be accepted in limited circumstances and are subject to additional regulatory protections, disclosures, and internal approval processes.

Full details of each service line are described below and available at www.wholesalebroking.com.

1. Broking Solutions - Broker-in-a-Box

WBS offers a comprehensive broker-in-a-box solution for businesses seeking to establish or expand a broking, wealth management, or institutional trading operation. Our end-to-end solution includes:

- Clearing and settlement access via AUSIEX (ASX and Cboe Australia Execution, Clearing and Settlement Participant)
- Industry-recognised trading platforms for desktop and mobile (Equix / IRESS), packed with tools for advisers and end clients
- White-labelling of trading platforms, client-facing documentation, and digital onboarding under your brand
- Access to an Australian Financial Services Licence (AFSL) as an Authorised Representative of BR Securities
- Compliance support through our network of compliance partners
- Fully digital, paperless client onboarding with electronic identity verification
- Back office administration portal for managing users, accounts, onboarding, and reporting

2. Wealth Solutions

WBS supplies wealth trading software and execution services for financial advisers, wealth managers, and financial planners. Services include:

- Trading tools and integration for advisers and end clients via Bloomberg, IRESS, and Refinitiv
- Sponsored HIN accounts, bulk/suspense account trading, and managed account infrastructure

- Two-way functionality enabling end clients to view transactions and reporting in real time
- Smart order routing for best execution across ASX and Cboe Australia

3. Institutional Solutions

Through BR Securities, WBS provides a buy-side trading solution for institutional investors including funds, superannuation trustees, and financial institutions. Services include:

- Flexible order routing and execution via Bloomberg and IRESS (including IRESS algorithms)
- Data feeds, institutional order routing, and settlement services
- Bulk and suspense account trading; short selling with counterparty risk minimisation
- Settlement via Omgeo CTM, IRESS ETC, or spreadsheet; DVP settlement with custodian
- Customisable trade reporting and real-time portfolio management
- API integration enabling seamless connection with existing trading systems and multi-exchange smart order routing

4. Corporate Solutions

Through BR Securities, WBS provides capital markets services to listed and unlisted companies seeking to raise capital or manage corporate transactions. Services include:

- Capital raises and placements in primary and secondary markets
- Access to investor networks via our commercial arrangement with Complii Fintech Solutions Ltd for its Corporate Highway product
- Facilitation and execution of equity capital market transactions for brokers and investors

5. Family Office Solutions

Through BR Securities, WBS provides multi-generational wealth management services for family offices and high-net-worth individuals and families. Services include:

- Discretionary portfolio management with tailored investment strategies
- Consolidated reporting across asset classes and custodians
- Family governance support, estate planning facilitation, and succession advisory
- Access to all WBS trading infrastructure including institutional execution, and direct market access

What Financial Services Are We Authorised to Provide?

WBS is authorised to:

- provide general financial product advice for securities, interests in managed investment schemes, basic deposit products facilities; and
- deal by applying for, acquiring, or disposing of securities, interests in managed investment schemes, basic deposit products facilities,

to and on behalf of retail and wholesale clients.

The above authorisations are provided under BR Securities Australia Pty Ltd AFSL 456663. Some services described in this FSG (including certain capital markets, and family office activities) may be subject to additional authorisations or may be provided in conjunction with other appropriately licensed entities. Clients engaging WBS for those services will receive service-specific agreements describing the applicable authorisations and entities involved.

No Personal Advice

WBS will not provide you with personal financial product advice or recommendations about any financial products in which we deal. From time to time, WBS may provide information about the characteristics of particular financial products. This information is intended to be purely factual; however, WBS is authorised to provide general financial product advice - that is, advice that does not take into account your personal objectives, financial situation or needs.

WBS does not make recommendations to trade nor in respect of any products.

Whenever WBS provides general financial product advice, we will include a warning that the advice has been prepared without considering your personal objectives, financial situation or needs, and that you should consider whether the advice is appropriate to your circumstances before acting on it. If you require personal financial product advice, you should seek advice from a licensed financial adviser. You are solely responsible for your own investment decisions and for assessing the suitability of any transaction or investment.

Our Dealing Service and Execution

Orders in relation to securities are executed in accordance with our Market Participants Best Execution Policy. A copy of that Best Execution Policy is available at www.wholesalebroking.com or upon request.

WBS's primary execution and clearing partner is Australian Investment Exchange Limited (**AUSIEX**), ABN 71 076 515 930, AFSL 241400, a full-service ASX Execution, Clearing and Settlement Participant and Cboe Australia participant. AUSIEX is part of the Nomura Research Institute (NRI) group.

Client money is held and managed by AUSIEX in accordance with the client money provisions of the Corporations Act 2001 (Cth). When you open an account with WBS, you also sign up for a separate account with AUSIEX. AUSIEX provides WBS with the ability to arrange for clients to trade, clear and settle on the ASX and Cboe Australia. AUSIEX will provide their own FSG and terms and conditions separately.

Instructions may be given via our website or supported mobile devices. Instructions by phone, email, fax, or post are not accepted for standard retail orders. Institutional clients should refer to their specific client agreement for order instruction methods.

Linked Cash Management Account

To arrange trading on ASX or Cboe Australia through WBS, you may be required to establish and link a Macquarie Cash Management Account (CMA) to your trading account. This account is used for settling transaction payments and fees. When you open an account with WBS, you authorise AUSIEX (AFSL 241400) to direct debit and credit that account as necessary for settlement.

If you already hold an existing CMA from the listed providers, you may link that account instead, provided it is held in the same name as your trading account. Institutional clients should refer to their specific client agreement for applicable cash and settlement arrangements.

How Are We Paid?

WBS is remunerated directly through the fees and brokerage commissions we charge clients. With respect to some financial products, WBS may also be remunerated by way of commission or other payments from a product issuer, subject to the conflicted remuneration provisions of the Corporations Act 2001 (Cth). Our employees are paid a salary and may receive other benefits such as bonuses.

WBS is not an agent of AUSIEX and has engaged AUSIEX on fixed-fee commercial terms to execute transactions arranged for clients.

Brokerage Schedule - Retail Equities

The following standard brokerage rates apply to retail clients for Australian equity transactions (all rates GST inclusive):

Equity Trade Size	Brokerage Rate
$500 up to $10,000	$9.45
$10,001 up to $15,000	$15.00
$15,001 and above	$15.00 or 0.099% - whichever is the greater

Brokerage Schedule - Wholesale Clients

For wholesale equity clients, institutional, and corporate clients, brokerage rates are negotiated individually and set out in the WBS Wholesale Brokerage Agreement or applicable client agreement. Contact us at info@wholesalebroking.com for a schedule applicable to your account type and volume.

Miscellaneous Service Fees

Service	Fee (including GST)
Off Market Transfers	$55.00
Paper Contract Note or Reprint	$5.50
Statement Reprint	$11.00
Fail Fee - Buy (Failure to Settle)	$110.00 or 0.11% per day, plus 15% p.a. calculated daily on outstanding amounts
Fail Fee - Sell (Failure to Settle)	$110.00 per day plus ASX fail fees (greater of $110 per fail per day and 0.11% per fail per day, max $5,500 per day)

Software and Data Fees

Software and Data Fee’s

WBS arranges software subscription and data services through Equix Technologies Pty Ltd or IRESS Pty Ltd. WBS does not provide any representation or warranty in relation to the performance, availability, or accuracy of third-party software. Such services are not provided by WBS, are not financial services, and are not covered by WBS's dispute resolution scheme. Software Terms and Conditions are available at www.wholesalebroking.com.

Conflicts of Interest

WBS’s revenue is derived from the brokerage commissions and fees charged to clients. This means WBS’s financial interests are aligned with client trading activity. WBS manages this potential conflict by providing execution-only and dealing services - we do not provide personal financial product advice or make recommendations to trade nor in respect of any products.

WBS and its directors have no material associations or relationships with product issuers (such as fund managers or listed companies) that could influence the services provided. WBS does not receive payments from product issuers in connection with client trading activity, other than as disclosed in this FSG. WBS maintains a Conflicts of Interest policy and takes steps to ensure conflicts are managed appropriately and fairly.

General Investment Risk Warning

WBS does not guarantee the performance of any financial product, the return of capital, or any particular rate of return. All investments involve risk and may result in loss of all your capital.

Design and Distribution Obligations

Under Part 7.8A of the Corporations Act 2001 (Cth), issuers of certain financial products are required to prepare and maintain a Target Market Determination (TMD) describing the class of retail clients for whom the product is appropriate. As a distributor of financial products, WBS takes reasonable steps to ensure that it distributes products consistently with relevant TMDs. TMDs for applicable products are available from the relevant product issuers. If you make a complaint or provide feedback about a product, WBS may be required to report this to the product issuer under the design and distribution obligations.

Privacy - How We Handle Your Personal Information

WBS handles your personal information in accordance with the Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs). Our full Privacy Policy is available at www.wholesalebroking.com/privacy.

In summary:

- We collect personal information (name, date of birth, address, contact details, HIN, SRN, bank account details, identity documents, and entity structure information) to open and operate your account, execute and settle transactions, comply with AML/CTF and regulatory obligations, and communicate with you.
- We may disclose your personal information to AUSIEX, share registries, ASX, Cboe Australia, AUSTRAC, ASIC, the ATO, and other regulators and service providers as required.
- Some personal information is held by Pipedrive CRM, with databases hosted in Frankfurt, Germany and the United States. All overseas transfers are subject to contractual safeguards under APP 8 of the Privacy Act.
- You have the right to access and correct personal information we hold. Contact our Privacy Officer at privacy@wholesalebroking.com.
- Complaints about privacy may be lodged with our Privacy Officer or with the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

Associations and Relationships

WBS's directors and related parties have no material associations or relationships with any product issuers that would influence the financial services provided. WBS is not an agent of AUSIEX. WBS and BR Securities are separate legal entities. Trade for Good is a registered business name of WBS used for its retail trading platform - the same AFSL authorisation and trading infrastructure supports both WBS and Trade for Good. Trade for Good clients and WBS clients use the same execution infrastructure and clearing arrangements. WBS does not preference either client segment in terms of execution quality, pricing, or liquidity access.

Complaints and Dispute Resolution

WBS is committed to resolving complaints promptly, fairly, and consistently in accordance with ASIC Regulatory Guide 271 - Internal Dispute Resolution (RG 271). AFCA is available to retail clients. If you believe you have been incorrectly classified as a wholesale client, you may be eligible to access AFCA - please contact our Complaints Officer in the first instance.

How to Lodge a Complaint

If you have a complaint about any aspect of our service, please contact our Complaints Officer:

- Email: complaints@wholesalebroking.com
- Phone: 1300 263 800
- Mail: Complaints Officer, WBS, PO Box 256, Flinders Lane VIC 8009

A full copy of WBS's Complaints Policy is available at www.wholesalebroking.com.

Our Internal Dispute Resolution (IDR) Process

- Acknowledgement within 1 Business Day (target: within 24 hours of receipt) in accordance with ASIC RG 271.
- Independent and objective investigation of the matter.
- Substantive written IDR response within 30 calendar days, including the outcome, reasons, findings on material facts, and your right to escalate to AFCA.

If your complaint involves significant complexity, we may require additional time (up to a maximum of 45 calendar days). We will notify you before day 30 of any extension, the reason, and an expected resolution date. The escalation path within WBS is: Complaints Officer (complaints@wholesalebroking.com) → CEO (alistairwarren@wholesalebroking.com). If your complaint is not resolved through our IDR process, you may escalate to AFCA.

External Dispute Resolution - AFCA

BR Securities Australia Pty Ltd (the AFSL holder) is a member of the Australian Financial Complaints Authority (AFCA), AFCA Member No. 38492. AFCA provides free, fair and independent financial services complaint resolution for retail clients.

- Website: www.afca.org.au
- Email: info@afca.org.au
- Telephone: 1800 931 678 (free call)
- Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

You may contact AFCA directly if you are not satisfied with WBS's final IDR response, or if you have not received an IDR response within 30 calendar days. You generally have 2 years from the date of WBS's IDR response to lodge a complaint with AFCA.

Compensation Arrangements - Professional Indemnity Insurance

BR Securities holds Professional Indemnity (PI) insurance satisfying the compensation requirements under s912B of the Corporations Act 2001 (Cth) and ASIC Regulatory Guide 126. This insurance:

- covers claims arising from the conduct of WBS as an Authorised Representative of BR Securities, including claims for financial loss caused by errors or omissions in the financial services provided;
- extends to claims arising from the conduct of current and former authorised representatives; and
- remains in force for the period required by s912B and ASIC RG 126.

Details of the PI insurance cover is available from BR Securities upon request.