

Bentham Asset Management Pty Ltd

Financial Services Guide

Investment Manager

Bentham Asset Management Pty Limited
ABN 92 140 833 674, AFSL 356199

Responsible Entity

Fidante Partners Limited
ABN 94 002 835 592, AFSL 234668

Fidante Partners Services Limited
ABN 44 119 605 373, AFSL 320505

PREPARATION DATE: 31 October 2018

Issued by Bentham Asset Management Pty Ltd (ABN 92 140 833 674, AFSL 356199), referred to as 'Bentham' in this Financial Services Guide.

Bentham does not provide personal advice to retail clients.
Past Fund performance is not an indication of future performance.

What is the purpose of this Financial Services Guide ('FSG')?

This FSG is an important document. It is designed to assist you in deciding whether to use any of the financial services offered by us, as described in this FSG. We are required to give you an FSG if we provide certain financial services to you and you are a retail client. This FSG contains important information about:

- who we are;
- the financial services we offer;
- the financial products to which those services relate;
- how we and others are paid in connection with those services;
- your privacy;
- how we deal with complaints; and
- how we can be contacted.

This FSG is not intended for 'wholesale clients' as defined by the Corporations Act 2001 (i.e. professional investors). References to 'you' and 'your' refer to potential investors who are not 'wholesale clients'. This FSG is provided by Bentham Asset Management Pty Ltd (ABN 92 140 833 674, AFSL 356199). References to 'Bentham', 'we', 'us' and 'our' refer to this entity.

Who are we?

Bentham acts as investment manager to a range of high yielding credit and fixed income managed investment schemes ('**Bentham Funds**'). Bentham makes investment decisions in relation to the Bentham Funds.

Either Fidante Partners Limited (ABN 94 002835 592, AFSL 234 668) (Fidante Partners) or Fidante Partners Services Limited (ABN 44 119 605 373, AFSL 320505), together referred to as '**Fidante Partners**' is the Responsible Entity and issuer of interests in the Bentham Funds.

The financial services we are authorised to provide

Bentham is authorised to carry on a financial services business to provide general financial product advice and dealing services for the following classes of financial products:

- (i) deposit and payment products
 - (ii) derivatives;
 - (iii) foreign exchange contracts;
 - (iv) debentures, stocks or bonds issued or proposed to be issued by a government;
 - (v) interests in managed investment schemes excluding investor directed portfolio services; and
 - (vi) securities
- to retail and wholesale clients.

Any advice provided by Bentham is limited to general financial product advice which we provide, for example, in our investment newsletters and website material. This information relates to product features, managing risk and return, investment market commentaries and economic overviews. We do not provide personal financial product advice to retail clients. Before you make any investment decision, we recommend that you obtain advice tailored to your individual objectives, financial situation and needs from a licensed financial adviser. We are responsible for the financial services provided to you under our Australian Financial Services Licences ('**AFSL**'). We do not act as a representative for any other AFSL holder.

Will you receive a Statement of Advice?

A person who provides a retail client with personal advice (that is, advice that takes into account the client's objectives, financial situation and needs) must give the client a Statement of Advice (SOA).

We do not provide personal advice to retail clients. Accordingly, you will not receive an '**SOA**' from us.

Will you receive a Product Disclosure Statement?

Before acquiring an interest in a Bentham Fund, you should obtain a Product Disclosure Statement ('**PDS**'). The PDS is designed to assist you to make an informed decision about the product. The PDS contains information about the product, the fees associated with acquiring the product and details of other fees and charges which may apply, including (if applicable) any fees, commissions or other benefits (collectively referred to as 'Adviser Remuneration') payable to financial advisers. You must confirm (via the application form) you have received or obtained a PDS before acquiring an interest in a Bentham Fund through Fidante Partners.

The PDS is prepared and issued by Fidante Partners as Responsible Entity of the Bentham Funds, and is available via either the **Fidante Partners** website or **Bentham website**.

Will you receive a General Advice Warning?

A person who gives retail clients general advice (that is, advice that is not personal advice) must warn the client that the advice does not take into account the client's objectives, financial situation or needs. Where we provide you with general advice, we will also provide you with a General Advice Warning. The General Advice Warning will be given in the same manner as the advice is provided (i.e. in writing or verbally).

How do you obtain further information?

This FSG contains general information about the financial services that we provide. When providing these financial services, we act on our own behalf. If you require more information, please contact us.

How we and others are paid for the financial services we provide?

If you acquire an interest in the Bentham Funds or receive services from Bentham, we will receive fees and other benefits. These are generally set out in the PDS for the product issued by Fidante Partners. Remuneration may include management fees and performance fees applicable to the particular product or service.

You can request further information about the fees associated with the Bentham Funds and services we offer by contacting us at info@benthamam.com.

Bentham staff are paid a salary and may be entitled to receive performance bonuses, other monetary benefits and non-monetary benefits. These payments are not an additional cost to you.

You may receive advice about Bentham Funds from financial advisers. These advisers may receive (in accordance with applicable legal requirements) remuneration if you buy our product. Your adviser is required to set out their Adviser Remuneration in the FSG and/or SOA they must give to you. If you have an ongoing fee arrangement with your financial adviser they must also provide you with a Fee Disclosure Statement on an annual basis.

We do not pay fees or other benefits to third parties solely for referring customers to us.

We may provide benefits to financial services intermediaries where the law permits us to do so. If we do, we will provide these benefits from our own resources. We maintain a register of these benefits. If you would like to review our register, please contact us.

Related parties and associates

We may enter into transactions with, and use the services of, any related parties. It is our policy to ensure that such arrangements are on arm's length commercial terms. We or any related parties or any director or officer of any of them may invest in any financial product we issue or manage. It is important that you understand our associations and relationships may give rise to a conflict of interest. We manage and disclose any conflicts of interest that may influence our services to you.

Conflicts of interest

Potential conflicts may occasionally arise between the interests of investors, ourselves and our related parties and other parties (including service providers appointed by us). We have statutory and common law fiduciary duties to manage conflicts of interest, and if there is a conflict, give priority to investors' interests.

We have policies, procedures and organisational arrangements in place to manage conflicts of interest. Our Board is responsible for the management and resolution of conflicts of interest arising in relation to the operation of the financial services we provide.

Privacy

We respect your privacy and have developed a Privacy Policy which embodies our legal obligations in respect of your privacy. Our Privacy Policy can be obtained by contacting us directly or by visiting our website www.benthamam.com.au.

Compensation arrangements

Bentham is insured under the terms of a current professional indemnity insurance policy, which complies with the requirements of section 912B of the Corporations Act. This insurance provide cover even if one of our employees has ceased to work for us.

How we deal with complaints

As part of our commitment to providing quality services to our clients, we endeavour to resolve all complaints quickly and fairly. Our policy is to acknowledge any complaint immediately and investigate, properly consider and decide what action (if any) to take and to communicate our decision to you within 45 days (30 days in relation to privacy complaints). If you have a particular complaint regarding your financial product or investment, please do not hesitate to contact us by calling us on +612 9994 7921 or by writing to:

Complaints Resolution Officer

Bentham Asset Management
Level 12, 179 Elizabeth St
Sydney NSW 2000

If you are not happy with our response or how the complaint has been handled (or if we have not provided a final response to you within 45 days or 30 days in relation to privacy complaints), you may contact the following external dispute resolution scheme.

If you wish to make a complaint after 31 October 2018, it may be done through the **Australian Financial Complaints Authority ('AFCA')** by post at GPO Box 3, Melbourne VIC 8007, by accessing its website at www.afca.org.au, or by phone at 1800 931 678.

How you can contact us and provide us with instructions?

To change your investment or personal details or conduct transactions, you need to instruct Fidante Partners, as Responsible Entity for the Bentham Funds, in writing. Some products and services may have their own rules on how to provide instructions or carry out certain instructions. Please refer to the relevant PDS for details.

You can contact Fidante Partners by

- calling Fidante Partners' Investor Services Team on 13 51 53
- visiting Fidante Partners' website www.fidante.com.au
- writing to Fidante Partners at Reply Paid 86049, SYDNEY NSW 2001

You can contact Bentham by

- emailing us at info@benthamam.com
- visiting Bentham's website www.benthamam.com.au
- writing to Bentham Asset Management at Level 12, 179 Elizabeth Street, SYDNEY NSW 2000

For more information on the Funds, see the relevant Product Disclosure Statements (PDS) available at www.fidante.com.au or call the Fidante Partners Investor Services Team on 13 51 53.

The information in this document is current as at September 2018 unless otherwise specified and is provided by Fidante Partners Services Limited (ABN 44 119 605 373, AFSL 320505) or Fidante Services (ABN 94 002 835 592, AFSL 234 668) (Fidante) the Responsible Entity and issuer of interests in the Bentham Global Income Fund (ARSN 105 898 271), Bentham Syndicated Loan Fund (ARSN 110 077 159), Bentham High Yield Fund (ARSN 088 907 224) and Bentham Asset Backed Securities Fund (ARSN 622 644 866) (the Funds). This information is intended as general information only and not as financial product advice and has been prepared without taking into account any person's objectives, financial situation or needs. Because of that each person should, before acting on any such information, consider its appropriateness, having regard to their objectives, financial situation and needs. Each person should obtain a copy of the relevant Fund's Product Disclosure Statement (PDS) and consider the information in the PDS (including the information about risks) before making any investment decisions. A copy of the PDS can be obtained from your financial adviser, our Investor Services team on 13 51 53, or on our website: www.fidante.com.au.

If you acquire or hold an investment in a Fund we will receive the fees and other benefits disclosed in the PDS for the Fund. We and our employees do not receive any specific remuneration for any advice provided to you. However, financial advisers may receive fees if they provide advice to you or arrange for you to invest in a Fund. Some or all of the Fidante Partners companies and their directors may benefit from fees and other benefits received by another Fidante Partners company. Neither Fidante nor any member of the Fidante Partners group of companies nor any investment manager or sub-advisor guarantees the repayment of capital or the performance of a Fund or any particular taxation consequence of investing. Any reference to 'Fidante' in this flyer is a reference to Fidante Partners Services Limited or Fidante Services Limited.