

Financial Services Guide

05 August 2010

Issued by:

nabInvest Managed Investments Limited ABN 61 083 784 463 AFSL 312122
nabInvest Capital Partners Pty Limited ABN 44 106 427 472 AFSL 308953



About this document

This Financial Services Guide (FSG) is an important document, which we are required to give you in accordance with each of our Australian Financial Services Licences (AFSLs). It provides you with information about nabInvest Managed Investments Limited (ABN 61 083 784 463) ('NMIL') and nabInvest Capital Partners Pty Limited (ABN 44 106 427 472) ('NICP'), each of which holds an AFSL (collectively referred to in this FSG as 'nabInvest', 'we', 'us' or 'our').

This FSG will help you understand the financial services that we each provide and to determine whether or not you, as a retail client, should use the financial services we offer. It includes details about:

- how we can be contacted;
- the financial services we are authorised to provide;
- how we and others are remunerated;
- our associations and relationships;
- our internal and external dispute resolution procedures; and
- how you can access them.

Product Disclosure Statements or other disclosure documents

Generally, before you can invest in one of our financial products, you will receive a PDS or other disclosure document (if we are required to provide it to you) containing information about the particular product to help you make an informed decision about whether to invest in that particular product, significant risks, and the costs, fees and charges associated with the financial product.

This FSG provides factual information and general advice only. In providing you with this factual information and general advice, we do not take into account any person's particular objectives, financial situation or needs. Before deciding whether to acquire any financial products, you should consider the appropriateness of the factual information and our general advice, having regard to your own objectives, financial situation and needs. You should consider these factors, and obtain a copy of the PDS or other disclosure document for the relevant financial product, before you make any investment decision on the basis of the factual information or general advice that we provide to you.

Contact details for NMIL and NICP

Website

www.nabinvest.com.au

Email

info@nabinvest.com.au

Telephone

During business hours (AEST time): 1300 738 355

Fax

02 8274 4833

Postal address

PO Box R1480
Royal Exchange
Sydney NSW 1225

About nabInvest

nabInvest Holdings Limited (ABN 16 134 158 517) ('NIH') houses the National Australia Bank Limited (ABN 12 004 044 937) ('NAB') Group's direct asset management business, adopting a 'best of breed' approach and identifying and partnering with investment managers across a diverse range of investment classes, including Australian and international equities, property, fixed interest, infrastructure, private equity and alternative investment funds.

NIH entities use significant in-house knowledge and industry connections to identify investment expertise, which can be fostered in-house or through partnering with the principals of boutique investment management firms. Our objective is to provide a market-leading suite of financial products with our managers' primary focus on producing 'alpha'; supported by a strong alignment of interests with our clients.

NMIL and NICP (as wholly owned subsidiaries of NIH) and its business partners benefit from the stability, strength, experience and resources that the NAB Group provides. nabInvest has the ability to access significant expertise and assets that may be considered unusual and/or difficult to source for smaller investment management firms.

NICP is a service company and fund manager for a number of managed investment schemes ('MIS'). NMIL acts as responsible entity/trustee of registered and unregistered MIS which are managed by or through NICP.

Associations and relationships of nablInvest

We are members of the NAB Group of companies and other members of the NAB Group provide various financial, funds management, investment and administrative services from time to time. We draw on the experience, expertise and resources of other entities in the NAB Group, who may provide services to us to support the financial services we provide to you.

nablInvest provides no warranty regarding the suitability of any of the services described in this FSG for any person.

Unless otherwise disclosed in the PDS or other disclosure document for a financial product, **a financial product issued or distributed by nablInvest is not a deposit with, investment in or other liability of NAB or any other company within the NAB Group, and neither NMIL or NICP nor any of the NAB Group companies stands behind or otherwise guarantees the capital value or investment performance of any financial product issued or distributed by NMIL and NICP. Financial products issued or distributed by NMIL or NICP are subject to investment risk, including possible delays in repayment and loss of income and principal invested.**

Financial services we provide

The financial services that we are authorised to provide are shown in the table below. When providing these financial services, each company acts on its own behalf.

Provide General Financial Product Advice	NICP	NMIL
Basic Deposit Products	✓	✓
Non-Basic Deposit Products	✓	✓
Non-cash payment products	X	X
Derivatives	✓	✓
Foreign Exchange Contracts	✓	✓
General Insurance Products	✓	X
Government Debentures, Stocks or Bonds	✓	✓
Managed Investment Schemes, including IDPS	✓	✓
Securities	✓	✓
Superannuation	✓	✓
Managed Investment Warrants	✓	✓
Provide Personal Financial Product Advice	NICP	NMIL
Basic Deposit Products	✓	X
Non-Basic Deposit Products	✓	X
Non-cash payment products	X	X
Derivatives	✓	X
Foreign Exchange Contracts	✓	X
General Insurance Products	✓	X
Government Debentures, Stocks or Bonds	✓	X
Managed Investment Schemes, including IDPS	✓	X
Securities	✓	X
Superannuation	✓	X
Managed Investment Warrants	✓	X

Deal in a Financial Product (issuing, applying for, acquiring, varying or disposing of a financial product in respect of the following classes of financial products)	NICP	NMIL
Derivatives	✓	X
Foreign Exchange Contracts	✓	X
Managed Investment Schemes, excluding IDPS	✓	X
Securities	✓	X
Managed Investment Warrants	X	X
Deal in a Financial Product (applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products)	NICP	NMIL
Basic Deposit Products	✓	X
Non-Basic Deposit Products	✓	X
Non-cash payment products	✓	X
Derivatives	✓	X
Foreign Exchange Contracts	✓	X
General Insurance Products	✓	X
Government Debentures, Stocks or Bonds	✓	X
Managed Investment Schemes, including IDPS	✓	X
Securities	✓	X
Managed Investment Warrants	✓	✓
Operate a Registered Scheme (schemes only holding the following types of products)	NICP	NMIL
Derivatives	X	X
Financial Assets	X	X
Provide a Custodial or Depository Service	NICP	NMIL
Non IDPS	X	X

Remuneration, commissions and other benefits for the financial services we provide

Any general financial product advice you receive from us in this FSG is free of charge. However, if you receive personal financial product advice, either from a NAB or NAB-related financial adviser or your financial adviser or any other entity, you may be charged fees or commission for the provision of the advice by the provider.

Employees of NAB and NICP

nabInvest has the benefit of the resources of the NAB Group, including its employees. Employees of NAB retained by NICP who provide you with a financial service do not receive specific payments or commissions in relation to the underlying financial products. These employees receive salaries (paid periodically, such as fortnightly or monthly), discretionary bonuses and other benefits from NAB.

The amount of bonuses and other benefits which employees may be entitled to will depend on various factors, such as the performance of that person during the year and in some cases the volume of sales attributed to that person during the year, as well as NAB's overall financial performance. Examples of non-monetary benefits include discounts on fees and rates on banking products (such as credit cards issued by NAB), cheaper rates for health care services and discounts to entertainment events.

Fund managers of NICP who provide you with a financial service may receive specific bonus payments through arrangements with NICP in relation to the performance of the underlying financial products. These employees receive salaries (paid periodically, such as fortnightly or monthly), bonuses linked to the performance of the funds they manage and other benefits from us or NAB. Examples of non-monetary benefits include discounts on fees and rates on banking products (such as credit cards issued by NAB), cheaper rates for health care services and discounts to entertainment events.

Financial Advisers

You may receive advice about our products and services from financial advisers. These financial advisers may work for NAB, a NAB-related entity or outside the NAB Group entirely. All advisers may receive remuneration and/or commissions if you buy our product. Such remuneration and/or commissions may be paid by NAB, NMIL or NICP, or under another arrangement between your adviser and a third party. Your adviser is required to set out the remuneration and/or commissions they receive in the FSG and/or SoA that they must give to you.

Application, ongoing and withdrawal fees

If you invest in a product or service that we provide, the product issuer or operator (eg NMIL) will receive remuneration in relation to your investment:

- **application fee** – which is generally based on a percentage of the application money when the financial product is issued;
- **ongoing fees** – which are generally a percentage of the value of your investment. These are generally received by NMIL or NICP after the end of the relevant calculation period (for example, monthly, quarterly or yearly) for as long as the financial product is held, or the financial service is provided. This may include management or performance-based fees; and
- **withdrawal fee** – which is generally deducted from the withdrawal price of your units as a percentage of that price.

Remuneration and fees received by NMIL may be paid to other companies within the NAB Group (including NICP) for services provided with respect to the product or service. The fees and costs applicable to the products and financial services we offer are set out in the relevant Product Disclosure Statement (PDS) or offer document for the product or service.

Fees received by related entities

nabInvest has relationships with other entities within and outside the NAB Group. These entities manage, distribute, issue and provide financial products and services that you may acquire from, or through, us. Each of us may pay a portion of the fees we receive in respect of the financial services we provide to you, to these entities for providing these services and products. The fees are paid to these entities periodically (for example, monthly or quarterly).

Third parties and referral fees

We do not pay commissions or provide other benefits to third parties referring customers to us.

You may request for particulars

For any of the remuneration, commissions and other benefits outlined above, you may contact us for the particulars of such remuneration, commission and other benefits received by any of the relevant persons. Your request for particulars must be made within a reasonable time after receiving this FSG and before we provide you with any of the financial services. We will respond by providing you with the range of amounts or rates of remuneration, commissions or other benefits, where the range or rates are attributable to the financial services we provide you.

Compensation arrangements

NMIL and NICP each hold professional indemnity insurance that satisfies the requirements for compensation under the Corporation Act 2001.

Additional information

Providing instructions to us

Unless otherwise stated in the relevant PDS or offer document, we require that you provide all instructions in writing, signed by you (either in writing or by electronic signature), addressed to each of us by email, fax or post to our contact details listed on page 2 of this FSG. Where those instructions are of a purely administrative nature, we will act in accordance with those instructions. Otherwise, if your instructions are addressed to NMIL, as a responsible entity, we will consider those instructions in accordance with our legal obligations and notify you accordingly if we are prevented from actioning your instructions by law.

Personal information

Privacy laws apply to the handling of your personal information by us. Any personal information collected about you will be handled in accordance with our Privacy Policy. The personal information that each of us collects will be used to provide you with financial services and for purposes of related activities in the provision of the services. Each of us may disclose your personal information to any person who is a company within the NAB Group at any time, to service providers who are engaged by us (for example, a call centre, a mailing house), to a person who acts on your behalf in relation to your investment (for example, your financial adviser) and to other third parties where we are required by law to disclose your information or where you have given your consent.

For more details our Privacy Policy can be viewed on our website www.nabinvest.com.au or a copy obtained by contacting us (our contact details are provided on page 2 of this FSG). You may be entitled to access all personal information that nabInvest holds about you. You also have the right to ask us to correct information about you that is inaccurate, incomplete or out of date. If you would like access or have any questions, please contact us (our contact details are provided on page 2 of this FSG).

Complaints

If you have a complaint about a financial service provided by either of us, you should take the following steps:

1. Call or write to us and ask for our Complaints Officer (our contact details are provided on page 2 of this FSG).
2. If you do not get a satisfactory outcome by contacting us, you can contact the Financial Ombudsman Service to help you settle your complaint.

The Financial Ombudsman Service (FOS) is an external dispute resolution scheme which provides free advice and assistance to consumers and investors to help them in resolving complaints relating to members of the financial services industry, including responsible entities of managed investment schemes, and AFSL holders who provide retail financial product advice and investment advice.

Contact details for FOS are as follows:

Telephone

1300 78 08 08

Facsimile

(03) 9613 6399

Website

www.fos.org.au

Postal address

Financial Ombudsman Service
GPO Box 3
Melbourne Victoria 3001

You can also contact the Australian Securities and Investments Commission (ASIC) on 1300 300 630 to make a complaint and to obtain further information about your rights.