DRUMMOND

CAPITAL PARTNERS

AFSL 534213

FINANCIAL SERVICES GUIDE

Version 1.0 – dated 26 August 2026

Financial Services Guide

This Financial Services Guide ("FSG") is issued by Drummond Capital Partners Pty Ltd ABN 15 622 660 182 ("Drummond", "DCP", "we", "us", "our"), holder of Australian Financial Services Licence ("AFSL") number 534213.

This FSG is designed to help you decide whether to use our financial services. Before you do, it explains:

- who we are and how to contact us;
- the financial services and products we are authorised to provide, and to whom;
- that we provide general advice only, and what that means for you;
- how we and our representatives are paid;
- conflicts of interest and how we manage them;
- how we handle your personal information; and
- how to make a complaint, and your access to external dispute resolution.

Please read this FSG carefully before obtaining our services. It contains general information only and does not take into account your personal objectives, financial situation or needs.

> **Not independent**
> Drummond designs and manages the investment models and strategies referred to in this FSG, for which we receive investment management fees. Because we may receive remuneration connected to products, we provide advice on, we are not able to describe ourselves, or our advice, as independent, impartial or unbiased for the purposes of section 923A of the Corporations Act 2001 (Cth).

About Drummond Capital Partners

Drummond Capital Partners is a Melbourne-based investment manager providing multi-asset separately managed account (SMA) solutions and investment research to financial advisers and their clients across Australia.

Contact details

Drummond Capital Partners Pty Ltd

Level 11, 55 Collins Street, Melbourne VIC 3000

Phone: 03 9131 8500

Email: enquiries@drummondcp.com

Website: www.drummondcp.com

Financial services and products we can provide

Drummond holds AFSL 534213, which authorises us to (1) provide general financial product advice and (2) deal in financial products (including arranging for another person to deal), in relation to the following classes of financial products, to retail and wholesale clients:

- Basic deposit products
- Non-basic deposit products
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Derivatives[1]
- Foreign exchange contracts[1]
- Interests in managed investment schemes (excluding IDPS)[1]
- Securities[1]

[1] Advice and dealing services are available to both retail and wholesale clients. Arranging for another person to issue, apply for, acquire, vary or dispose of derivatives, foreign exchange contracts, interests in managed investment schemes (excluding IDPS) or securities is available to wholesale clients only.

We provide general advice only

The Corporations Act 2001 (Cth) ("the Act") defines advice on financial products as being either personal or general in nature. Please note that Drummond is a provider of General Advice only, as defined under the Act, and does not provide personal financial advice.

To the extent that any of our products or services are considered General Advice, under the provisions of section 949A of the Act, Drummond is required to warn you that:

1. the advice has been prepared without taking into account your objectives, financial situation or needs;
2. you should consider the appropriateness of the advice, in light of your own objectives, financial situation or needs, before acting on the advice; and
3. if our advice relates to the acquisition or possible acquisition of a particular financial product, you should obtain a copy of and consider the PDS or offer document for that product before making any decision.

If you need advice that takes into account your personal circumstances, please seek personal financial advice from a licensed financial adviser.

How we are remunerated for our services

Drummond is principally remunerated by way of investment management fees, generally calculated as a percentage of the funds invested in the models and strategies we manage. These fees are paid by the relevant platform operator, responsible entity or product issuer, and are set out in the PDS, IDPS Guide or other disclosure document for the relevant product. We do not charge retail clients directly for the general advice referred to in this FSG.

Our representatives are paid a fixed salary and may be eligible for a discretionary, performance-based bonus. No representative receives a commission or other benefit that is directly linked to a recommendation of a particular financial product.

From time to time, we may receive non-monetary benefits from product issuers and other third parties, such as sponsorship of industry training, education or conferences. Benefits of this kind are recorded in our conflicts of interest register, available to you on request.

Conflicts of interest

We manage conflicts through our Conflicts of Interest Policy, including oversight of our investment models by our Investment Committee, governance under our Investment Policy Statement, and separation between our investment/portfolio construction functions and client-facing functions. We do not have any related-party relationships with the issuers of underlying financial products included in our models, other than the investment management arrangements described above.

Privacy

We collect, use and store your personal information in accordance with the Privacy Act 1988 (Cth) and our Privacy Policy, available at www.drummondcp.com or on request. Our Privacy Policy explains what information we collect, how we use and disclose it, and how you can access or correct your information, or raise a privacy concern.

Complaints and dispute resolution

If you have a complaint about our services, please contact us in the first instance:

- Email: enquiries@drummondcp.com
- Phone: 03 9131 8500
- Mail: Level 11, 55 Collins Street, Melbourne VIC 3000

We will acknowledge and aim to resolve your complaint in accordance with our internal Complaints Handling Policy, and in any event within the timeframes required by law (currently 30 calendar days).

If you are not satisfied with our response, or we have not responded within that time, you may refer your complaint free of charge to:

> **Australian Financial Complaints Authority (AFCA)**
> Website: www.afca.org.au
> Email: info@afca.org.au
> Phone: 1800 931 678 (free call)
> Mail: GPO Box 3, Melbourne VIC 3001
> Time limits may apply to lodging a complaint with AFCA - check the AFCA website for details.

Professional indemnity insurance

Drummond maintains professional indemnity insurance that we consider adequate having regard to the size and nature of our business, satisfying our obligations under section 912B of the Corporations Act 2001 (Cth). This insurance covers claims relating to the conduct of representatives who are no longer authorised by us, in respect of the period during which they were authorised.