

***emergchants***  
*empowering | Your Money*

**Ladbrokes Card  
Financial Services Guide**

Effective 4 March 2014

# FINANCIAL SERVICES GUIDE

## PURPOSE AND CONTENTS OF THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide (“FSG”) is issued by Emerchants Payment Solutions Limited (“EPSL”).

This FSG is an important document which provides information about the financial services offered by EPSL and the Corporate Authorised Representative of EPSL, Ladbrokes Digital Australia Pty Ltd ABN 25 151 956 768 (“Ladbrokes”), whom EPSL has agreed may provide financial services on its behalf. After reading this FSG, you will know:

- Who we are and how to contact us;
- What financial services can be provided to you and how these services will be provided to you;
- How we (and any other relevant persons) may be remunerated;
- Whether any relevant associations or relationships exist that may influence our advice;
- How we maintain your personal information; and
- How to access our internal and external complaints handling arrangements

The content of this FSG is general information only and does not take into account any person’s particular needs or objectives. EPSL provides no warranty as to the suitability, for any person, of the services outlined in this FSG.

If you need any more information than is contained in this document please contact us. You have the right to ask us about our charges, the type of advice we will provide you, and what you can do if you have a complaint about our services.

**Important:** EPSL and its Representatives will not provide personal advice (advice that takes into consideration one or more of your financial objectives, circumstances or needs). We are obliged to warn you that advice provided to you as a retail client does not take account of your objectives, financial situation or needs. Therefore, you are required to ensure that you obtain advice from a licensed professional regarding the suitability, for your own circumstances, of utilising our products and services.

## ABOUT EPSL

EPSL (ABN 30 131 436 532) is an Australian Financial Services Licensee, Licence No. 404131. EPSL arranges for the sale and distribution of the Ladbrokes Card.

EPSL’s Head Office is located at:

Level 2, 26 Commercial Road, Newstead QLD 4006  
Ph: (07) 3607 0100  
Fax: (07) 3607 0111  
Internet address: [www.emerchants.com.au](http://www.emerchants.com.au)

EPSL will be acting on its own behalf at all times when:

- Ladbrokes arranges for the sale of and provides general financial product advice in relation to the Ladbrokes Card; and
- Ladbrokes promotes the Ladbrokes Card.

EPSL is therefore responsible for those financial services provided by its Authorised Representatives. EPSL has authorised Ladbrokes to distribute this FSG.

## **YOUR REPRESENTATIVE**

The Authorised Representative entity is Ladbrokes Australia Pty Limited, ABN 25 151 956 768, Authorised Representative number **454209**.

Ladbrokes is authorised by EPSL to arrange for the issue of, and to provide general financial product advice in relation to the Ladbrokes Card. Ladbrokes is not authorised to give you personal financial product advice in relation to the Ladbrokes Card.

Business Address: 461 - 473 Lutwyche Road, Lutwyche Qld 4030

Telephone: 1300 523 276

Web: <http://www.ladbrokes.com.au/contact-us/>

## **WHAT KINDS OF FINANCIAL PRODUCTS AND SERVICES CAN LADBROKES PROVIDE?**

Your Representative is authorised by EPSL to provide general financial product advice to retail and wholesale clients in relation to deposit and payment products limited to:

- Basic deposit products; and
- Non-cash payment products.

This means your Representative can:

Arrange for the issue of the Ladbrokes Card

- Deal with any request for financial advice in relation to the Ladbrokes Card by telling the person requesting the advice how they can contact EPSL; and
- Publish or issuing certain promotional material in relation to the Ladbrokes Card.

Ladbrokes is not authorised to provide (and EPSL itself does not provide) personal advice about financial product. Personal advice is advice when your objectives, financial situation or needs have been or would be expected to be considered.

This means that Ladbrokes won't take your objectives, financial situation or needs into account whenever it gives advice (in publishing or issuing promotional material) about the Ladbrokes Card. The kind of advice that Ladbrokes may give is called general advice.

It is therefore your responsibility to decide for yourself whether any general advice given by Ladbrokes in its promotional material is suitable for you, or to get personal advice from a financial adviser who holds an Australian Financial Services licence or who is an authorised representative of the holder of an Australian financial services licence.

Your Representative can only provide advice on non-cash payment products limited to the Ladbrokes Card. An Authorised Representative of EPSL cannot advise you on, or influence you in favour of, a financial product which is not a product they are authorised to provide advice on.

Please be aware that EPSL shall not be responsible where the Representative provides any services to you which are outside of their authorisation limits. You should therefore ask your Representative to specifically confirm that the service or product does not fall within one of the above exclusions, prior to acting on any general advice.

We will also provide you with, or explain how to access, a Product Disclosure Statement ('PDS') for the Ladbrokes Card. The PDS contains information about the costs, benefits, risks and other features of the recommended financial product. You should read this information to enable you to make an informed decision prior to acquiring the recommended financial product.

## **CAN I PROVIDE MY REPRESENTATIVE WITH INSTRUCTIONS**

You may provide your Representative with specific instructions by letter, email, telephone, fax or other means (as agreed with your Representative).

## **DISCLOSURE OF ANY RELEVANT CONFLICTS OF INTEREST**

EPSL and Ladbrokes are not related entities. Ladbrokes do not have any relationships or associations that might influence us in providing you with our services.

Ladbrokes is a wagering services operator, licenced to act as a bookmaker in respect of race meetings and sports betting. Ladbrokes is licenced and regulated under the Norfolk Island license number 20110511 and are governed by their Responsible Gambling Code of Conduct.

The revenue received by Ladbrokes for the provision of wagering services has no relation to the issue of the Ladbrokes Card. Ladbrokes does not receive any portion of the Ladbrokes Card fees and charges.

## **HOW ARE WE PAID FOR PROVIDING FINANCIAL SERVICES**

Ladbrokes directors and staff are remunerated by salary that includes superannuation benefits. Ladbrokes staff may also be eligible for an annual bonus payment based on agreed performance levels.

Employees of EPSL do not receive, whether directly or indirectly, any fee, commission, benefit or advantage (pecuniary or otherwise) in connection with the financial services provided.

The table below represents a summary of the fee splits applicable to the Ladbrokes Card.

EPSL receives interest income from Cuscal Limited (ABN 95 087

822 455) (an Authorised Deposit Taking Institution) on the total card holder funds held in Cuscal Limited Bank's accounts in relation to the Ladbrokes Card. This interest income cost is not borne by card holders.

Description	EPSL Fee	Card Holder
ATM Withdrawal (Australia)	Nil	ATM Owners Fee
Disputed Transaction Fee	\$10.00	\$10.00
Replacement Card Fee	\$5.00	\$5.00
Lost Card / PIN Balance Transfer	\$5.00	\$5.00

## OUR RECORD KEEPING OBLIGATIONS

EPSL will seek to ensure that comprehensive and accurate records of all services and products and client dealings are properly maintained.

## HOW CAN YOU ACCESS EPSL'S COMPLAINTS HANDLING ARRANGEMENTS?

EPSL is a member of the Financial Ombudsman Service ("FOS"). If you have a complaint regarding the provision of financial services to you, you should take the following action:

- Speak to your Representative about your concerns, or
- Contact EPSL on (07) 3607 0100 during business hours and ask to speak to one of our Customer Relations Specialists

If after speaking to your Representative or our Complaints Officer, your complaint is not resolved within three (3) days, please put your complaint in writing and send it to us, addressed to:

The Chief Risk Officer  
Emerchants Payment Solutions Limited Locked Bag No.5  
Fortitude Valley BC QLD 4006

Whilst every endeavour will be made to resolve the matter promptly and impartially, if you are not satisfied with how your complaint is dealt with, you can elect to refer the matter, free of charge, to the FOS. FOS can be contacted on 1300 780 808. You can also write to them at:

Financial Ombudsman Service Ltd  
GPO Box 3  
Melbourne VIC 3001

Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on free-call 1300 300 630 or visit the website [www.asic.gov.au](http://www.asic.gov.au).

## PROFESSIONAL INDEMNITY INSURANCE

EPSL is required by the Corporations Act 2001 to have in place compensation arrangements which are designed to compensate

retail clients for losses they suffer as a result of a breach by EPSL or its authorised representatives of the obligations outlined in Chapter 7 of the Corporations Act 2001.

Pursuant to s912B of the Corporations Act (and Corporations Regulation 7.6.02AAA), EPSL maintains adequate professional indemnity insurance to cover the financial services provided by its licensed entities. The policy maintained by EPSL provides coverage in the aggregate of up to \$5,000,000 to cover claims regarding professional indemnity, including misleading and deceptive conduct, intellectual property, defamation and fraud/dishonesty payable by EPSL per professional indemnity policy claim.

## **PRIVACY**

Your privacy is important to us and we are committed to compliance with the Privacy Act and the Australian Privacy Principles. We may disclose your personal information to external or related parties who act on our behalf in the operation of our business. Such external parties are required and committed to protecting your privacy. EPSL and its associates will not otherwise disclose your personal information without your consent, except as authorised or required by privacy laws. Please contact us if you have any concerns.

EPSL's Privacy Policy ([www.emerchants.com.au/privacy](http://www.emerchants.com.au/privacy)) contains information about:

- The circumstances in which EPSL may collect personal information from other sources (including from a third party);
- How to access personal information and seek correction of personal information; and
- How you can raise concerns that EPSL or Ladbrokes have breached the Privacy Act or an applicable code and how EPSL will deal with those matters.

## **HOW DOES EPSL DEAL WITH THE ANTI-MONEY LAUNDERING / COUNTER –TERRORISM FINANCING ACT 2006 (“AML/CTF ACT”)?**

EPSL has an obligation under the AML/CTF Act to verify your identity before we can provide you with any financial services. Your Representative will let you know what documentation you will need to present to satisfy the customer identification requirements under the AML/CTF Act.

## **DO WE HAVE ADEQUATE COMPLIANCE SYSTEMS?**

We remain up to date on industry compliance issues pursuant to our Australian Financial Services Licence, which requires staff to undergo ongoing training in respect of our responsibilities to you.