

FINANCIAL SERVICES GUIDE

This Financial Services Guide was updated on 26 July 2010 and issued by Port Phillip Publishing Pty Ltd.

This Financial Services Guide (FSG) is designed to inform you of certain matters relating to our future relationship before we provide you with a financial service. It covers who we are, how we can be contacted, the financial services we are authorised to provide, how our staff are paid, details of any potential conflicts of interest and how you can make a complaint.

This information is set out in the questions and answers that follow.

Please keep this guide for future reference. Should you lose it, a copy is available from us on request or can be downloaded from our website at www.portphillippublishing.com.au/fsg.html

If you do not understand anything in it, or require more information, please feel free to contact us (details below).

Who is Port Phillip Publishing?

Port Phillip Publishing (PPP) is a publisher of financial information via newsletters, emails, websites and reports. Port Phillip Publishing Pty Ltd is a 100%-owned subsidiary of Agora Inc, a company located in Baltimore, Maryland, USA. PPP publishes the following services:

- Slipstream Trader – subscription-only trading service
- The Swarm Trader – subscription-only trading service
- Diggers and Drillers – subscription-only newsletter and e-letter
- Australian Small Cap Investigator – subscription-only newsletter and e-letter
- Australian Wealth Gameplan – subscription-only newsletter and e-letter
- The Daily Reckoning – free e-letter
- Money Morning – free e-letter

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Who will provide the financial services to me?

Port Phillip Publishing Pty Ltd acts on its own behalf. Port Phillip Publishing Pty Ltd is responsible for the financial services provided to you.

Australian Financial Services License Number: 323 988

What kind of financial services is PPP authorised to provide and what kind of products do these services relate to?

Port Phillip Publishing Pty Ltd is licensed by the Australian Securities and Investments Commission (ASIC) to carry on a financial services business to:

- provide general financial product advice for the following classes of financial products;
 - securities
 - derivatives

to retail and wholesale clients (our subscribers).

We advise on securities through our newsletters, e-letters, websites and reports.

We do not offer any services for you to buy or sell the securities or derivatives we recommend. A list of stockbrokers who are licensed to deal in securities is available from the Australian Securities Exchange (www.asx.com.au).

IMPORTANT: We provide general financial product advice only, **not** personal financial product advice. The advice published by Port Phillip Publishing has been prepared **without** taking into account your objectives, financial situations or needs. Before acting on our recommendations, you should consider their appropriateness to your specific investment objectives, financial situation and needs. If you are uncertain as to what your objectives and needs are, you should contact a financial adviser or stockbroker who is licensed to provide you with personal financial product advice.

How does PPP get paid?

Port Phillip Publishing is a subscription-based service. A subscription fee is payable when you subscribe to one of our newsletters. Some of our e-letter services are free. Publisher's prices at the time of preparation of this FSG are:

- Slipstream Trader – *A\$1495 annually*
- The Swarm Trader – *A\$1499 annually*
- Diggers and Drillers – *A\$298 annually*
- Australian Small Cap Investigator – *A\$199 annually*
- Australian Wealth Gameplan – *A\$299 annually*
- The Daily Reckoning – *Free email service*
- Money Morning – *Free email service*

Note: prices are subject to change.

Port Phillip Publishing Pty Ltd does not receive any other fees, commissions or benefits for the services it provides.

All employees and directors of Port Phillip Publishing Pty Ltd receive a salary. They may also receive performance based bonuses. No employee is entitled to any other fees, commissions or benefits from Port Phillip Publishing Pty Ltd or any other person in relation to the financial services provided.

How does PPP manage potential conflicts of interest?

Port Phillip Publishing Pty Ltd does not have any relationships or associations with any financial product providers that influence, or could reasonably be expected to influence us, in the provision of financial services that we are licensed to provide.

Our employees are not permitted to buy and sell shares that the Company currently recommends. If an employee already holds shares that we subsequently recommend, they must inform the Compliance Officer and Director accordingly. The employee may not trade in those shares for 10 trading days after publication of such a recommendation.

Employees are prohibited from telling third parties the substance of recommendations before they are published, and are not allowed to instruct others to act on recommendations before they are published or during the blackout period.

What should I know about the risks of the financial product advice PPP provides?

There are risks with all securities and derivatives. Their prices may fall as well as rise, and there is a chance you could lose your entire investment.

We assign risk ratings to the securities we recommend in the newsletter. Note that these risk ratings are general in nature. We do not guarantee the performance of any securities or derivatives we recommend.

As indicated above, we provide general financial product advice only. We do not provide personal product advice. You should consult a financial advisor or stockbroker who is licensed to provide you with personal financial product advice if you require any advice on securities, derivatives, managed investment schemes, or if you require assistance in determining your particular risk profile.

Compensation Arrangements:

Port Phillip Publishing has Professional Indemnity Insurance in place to cover us and our representatives for liability arising from the financial services we provide. We understand it is adequate to meet our requirements as a financial services licensee.

What information does PPP maintain in my file?

We keep your name and address details in our database for the purpose of providing the services you request. We may also keep your telephone and email details if you provide them to us, as well as a record of correspondence between you and us, including emails, telephone conversations and letters. At any time, you may change or remove your details by contacting us.

We may from time to time inform you of special offers. You may opt out of receiving any of these.

Port Phillip Publishing respects your privacy and abides by the Privacy Act 2002.

How do I make a complaint?

We try to adhere to the highest standard of conduct at all times. Nevertheless, we understand there may be times when you would like to make a complaint about our services. Our dispute resolution process is as follows:

1. Contact us and tell us about your complaint. We will try to resolve it fairly and within 48 hours.
2. If it is not resolved satisfactorily, please write to the Director of Port Phillip Publishing with your complaint using the contact details in this FSG.
3. If your complaint still cannot be resolved, Port Phillip Publishing is a member of an external dispute resolution scheme called The Financial Industry Complaints Services (FICS). FICS can be telephoned on 1300 780 808 and its website is www.fics.asn.au. FICS will facilitate discussions and negotiations between the parties to help reach an agreement and provide an independent adjudicator if necessary. There is no fee to members for this service.
4. The Australian Securities and Investments Commission (ASIC) also have an information line which you can use to make a complaint or obtain information about your rights. The telephone number is 1300 300 630.

Professional Indemnity Insurance

In accordance with the requirements of the Corporations Act, Port Phillip Publishing and Sound Money maintain adequate Professional Indemnity Insurance. This insurance cover extends to claims in relation to our conduct as an Australian Financial Services license holder and authorised representative of a license holder and our employees and representatives past and present, to compensate clients for loss or damage suffered if we provide negligent advice.