



FINANCIAL SERVICES GUIDE

This Financial Services Guide (**FSG**) is an important document. As the provider of financial services to retail clients, we are required to provide you with this FSG. This FSG relates to the services we may provide to you through our trading platform which are regulated as financial services by the Corporations Act 2001 (**Corporations Act**). It is designed to assist you in deciding whether to use any of the financial services offered by Asia Win Inc Limited, company number 1864294 t/a GUGU (**GUGU, we or us**), a Corporate Authorised Representative (AFS representative Number 001304618) of Quad Code AU Ltd (ACN 131 376 415), the holder of Australian Financial Services License number 327075 (**Quadcode**).

This FSG provides you with important information about:

- who we are
- Other documents that you may receive
- the types of services and products we can offer you, including the financial product advice you may receive
- how you can give us instructions
- how we (and other relevant persons) are remunerated for these services and products
- compensation arrangements
- significant relationships and associations we have
- our privacy policy and how we protect your personal information
- our complaints handling procedures and how you can use them
- records we keep
- how you can contact both us and Quadcode.

Quadcode has authorised the distribution of this FSG by GUGU.

Who we are?

GUGU is the operator of a digital investment platform that provides investors the ability to trade stocks online. GUGU' vision is to serve users in becoming the top choice investment platform for next generation.

Other disclosure documents

The terms and conditions governing the financial services we may provide to you through our online platform are set out in the [Online Broker GUGU Terms and conditions](#)

Our other disclosure documents are available at <https://www.gugu.fund/en>

If we make a recommendation to acquire a particular financial product (other than securities such as listed shares) or offer to issue, or arrange the issue of, a financial product (other than securities such as listed shares) to you, we will provide you with a product disclosure statement (**PDS**) containing important information regarding the features, benefits, fees and risks associated with that financial product to assist you in making an informed decision about whether to invest in the financial product. You should consult with your licensed financial adviser if required.

If you obtain personal advice from a licensed financial adviser, they will provide you with a Statement of Advice (**SOA**).

What types of financial services and financial products we can provide

We and any other financial service provider involved in our digital platform solution act on your behalf when providing financial services to you.

Quadcode has authorised us to provide the following financial services with respect to the following financial products to wholesale and retail clients:

1. Provide Financial Product Advice to retail and wholesale clients for the following classes of financial products:
 - (a) Securities;
2. Deal in a financial product to retail and wholesale clients by applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the following classes of products:
 - (a) Securities;

Currently all financial product advice that we provide is general advice (e.g. where we publish blogs, conduct online learner courses, provide stock screener, free market or data analysis, articles on investment that falls outside of being merely factual information that we provide is general advice). This means we do not take into account any of your individual objectives, financial situation or needs. Before investing in any financial product through our platform, you should consider whether the product is appropriate for you, and you may wish to consult a suitably licensed professional financial adviser.

If you become a customer of ours, you may also receive financial services from other providers and, where relevant, they will separately provide you with their own Financial Services Guides or related other disclosure documents.

We are not a participant of any stock Exchange and we do not trade directly on stock Exchanges on your behalf. Therefore, when you use our trading services, this involves us arranging for other providers to enter into trades on the relevant Exchanges on your behalf. We require you to familiarise with relevant Exchange Rules prior to engaging in any trading activity.

Our trading platform allows you to trade securities and exchange traded funds (ETFs) on the exchanges in the United States (**US**).

In order for you to trade US securities and ETFs, we will arrange for you to trade through Alpaca Securities LLC ("**Alpaca**"), a member of Securities Investment Protection Corporation ("**SIPC**") who will hold all financial products acquired by you as a custodian in accordance with the [Alpaca Customer Agreement](#)

How to instruct us

We will accept your dealing instructions via our trading platform. Any other form of communication which is not a dealing instruction may be made by telephone, by email, via website or in person.

Trade confirmations and account statements will be either sent by email or stored in the trading web platform or mobile application followed by an email alerts or notification.

Remuneration or other benefits we may receive

We provide the services in accordance with the Terms and Conditions. Our details are available on our website at <https://www.gugu.fund/en> and the charges payable depend on the financial services that are provided to you.

Included within the charges are the fees we charge for your use of our platform and other providers' fees. For example when we charge you fees to trade US securities and ETFs, the amount that we charge will account for the amount that is paid to Alpaca for the services they provide to you.

Alpaca is not separately remunerated by you for the custodial or depository services it provides to you, as described above.

We may retain interest from cash balances held in the omnibus cash custodian account(s) maintained with The Shanghai Commercial & Savings Bank Ltd. This interest is paid at a rate determined by the bank from time to time.

Our representatives are remunerated by salary that include bonuses and other benefits and incentives (both monetary and non-monetary) from GUGU and do not directly receive any commissions or fees. Bonus payments and other benefits are discretionary and are based on achievement of predetermined objectives and may include but are not limited to, business, customer, productivity and risks. Our representatives may also be eligible to indirect benefits including overseas travel or corporate promotion merchandise or similar.

Various members of Quadcode and their directors and employees provide certain financial, information technology, human resource and other services to us to enable us to provide the services described in this FSG. You will not be charged for this. We pay for the costs of providing these services from what we receive.

The information in this section is subject to change and does not include information in relation to the fees, taxes or charges that you may be required to pay in relation to other services that you make using our platform.

Third-Party referrals

GUGU may enter commercial arrangements with external parties or other financial service providers at its discretion, who may directly or indirectly introduce clients to us. We may share a portion of income to such referrals.

Compensation arrangements

We and Quadcode maintain professional indemnity insurance cover in respect of financial services provided to our clients. This insurance covers claims in relation to the conduct of our past and present representatives in respect of any loss or damage suffered by you due to a breach by us of our regulatory obligations. These arrangements comply with the requirements of section 912B of the *Corporations Act 2001* (Cth) and 7.6.02AAA of the *Corporations Regulations 2001* (Cth).

Details of associations and relationships

We have working arrangements with our holding company and or other related parties. These entities provide services to GUGU and/or you to enable us to provide you the financial services.

Disclosure of relevant conflicts of interest

Neither we nor Quadcode have any relationships or associations which might influence us or them in providing you with any of our financial services.

Privacy

Your right to privacy is important to us. When we provide financial services to you, we may need to collect your personal information. Your personal information (including any sensitive information) will be handled in accordance with our Privacy Policy. This policy outlines how the information we collect from you will be used, stored and disclosed consistent with the *Privacy Act 1988* (Cth).

Our Privacy Policy (embed [Online Broker GUGU Privacy Policy](https://www.gugu.fund/en) is available at <https://www.gugu.fund/en>

Complaints handling

Quadcode and GUGU have established procedures for dealing with complaints which cover the financial services that we provide to retail clients.

If you have a complaint about the financial services we provide, you should first contact us. If you cannot resolve the complaint with us, then you should contact Quadcode. Our contact details and Quadcode's contact details can be found at the end of this FSG.

We will acknowledge your complaint within 1 business day of receipt. We will investigate complaints with the aim to provide a response (if not a resolution to the complaint) within 30 days.

If you are ultimately dissatisfied with the outcome of your complaint, you may refer the matter, free of charge, to the Australian Financial Complaints Authority (**AFCA**), which is an external dispute resolution scheme.

The contact details for AFCA are:

Phone: 1800 931 678
Fax: (03) 9613 6399
Email: info@afca.org.au
Mail: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Website: www.afca.org.au

Quadcode is a member of AFCA.

Please note that if you have a complaint about a financial product rather than about our services, then you should contact the relevant product issuer. The PDS for the relevant product will explain how you can do this.

Record keeping

We will seek to ensure that comprehensive and accurate records of all transactions and investments undertaken, and documentation executed, are properly maintained.

Contacting us

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