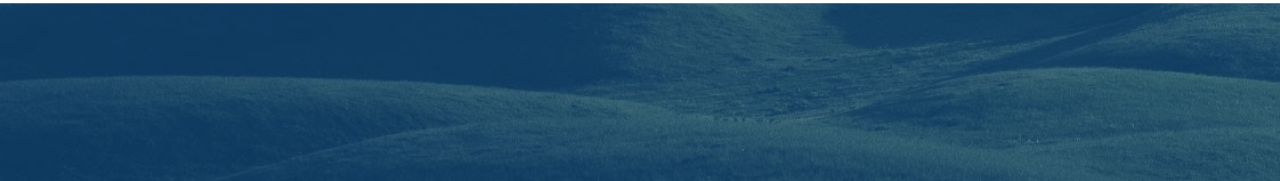




**BARDINS**

# A Complete Financial Service Solution



**2024**

# Executive Summary



## Excellence in Governance & Compliance provides for Opportunity & Growth

Bardins is a boutique financial services group of companies. The group has been offering advisory and dealing services for over a decade to a broad range of financial services clients in a variety of industries including property, agriculture, logistics and covering areas of expertise including managed investment schemes, securities, derivatives, foreign exchange contracts and custody.



### Bardins Advantage in Partnering with other Professional Service Providers



# Our Services



## Bardins offer an extensive suite of services

Bardins provides traditional compliance services while maintaining a modern and innovative outlook in terms of areas of business and mode of delivery. Our team achieves results, through designing and implementing objective and practical strategies, with a focus on providing a variety of solutions to reduce risk for clients across a variety of domains.



AFS licensing and compliance management

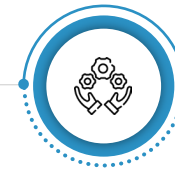


Trustee & Incidental Custodian Services

AFS License No. (247858)



Funds Management (MIS)



**Managed Investment Schemes, Derivatives**

AFS License No. (247858)



Based in Australia, we have strong Asia Pacific business partnerships, particularly in Singapore. Bardins believe that success is not only achieved by creating collaborative and inclusive partnerships with our clients but paying attention to the detail and risks of our clients' business.

## Bardin Capital's AFS License No. 247858 Wholesale Authorisations:

### Financial Product Advice:

- › Deposit Products (Basic /Non-Basic)
- › Derivatives
- › Foreign Exchange Contracts
- › Debentures, stocks or bonds issued or proposed to be issued by a government
- › Managed Investment Schemes (excl. IDPS)
- › Securities

### Dealing Services by Issue:

- › Derivatives
- › Managed Investment Schemes (excl. IDPS)
- › Securities

### Dealing Services on Behalf of Others:

- › Deposit Products (Basic/Non-Basic)
- › Derivatives
- › Foreign Exchange Contracts
- › Debentures, stocks or bonds issued or proposed to be issued by a government
- › Managed Investment Schemes (excl. IDPS)
- › Securities



### Bardin Capital provides compliance services for:

- Corporate Authorised Representatives
- Equities listed on various established securities exchanges (Domestic/International)



- Managed Investment Schemes (excluding IDPS) specialising in Property
- Derivatives



- Trustee and Incidental Custodial Services

# AFS Licensing



Bardins has successfully written and varied 50+ AFS Licenses



Bardins specialises in the creation and submission of AFSL application (FS01) for clients seeking AFS licenses across a variety of sectors, such as:

- Insurance
- Mortgages
- Funds Management
- Residential and Commercial Property
- Stockbrokerage
- Agricultural Investments
- Derivatives (OTC, EFT)
- FOREX



For clients who already possess an AFS License, Bardins further assists in achieving variations surrounding license conditions, authorisations, and Responsible Managers.

FS01 Client	AFSL No.	Sector
Bardin Capital Pty Ltd	247858	Derivatives
Keystone Underwriting	518224	Insurance
EBN Holdings	518220	Insurance
VRGK Tech	525757	Market Making/Derivatives
Gauge Lending	507753	Legal/Contributory Mortgages
CS & CoManagement	495639	Legal/Contributory Mortgages
Millpoint Insurance	506127	General Insurance
Cullen Capital	230633	Funds Management
Rockworth Capital	483942	Funds Management/Property
MV Anderson	481626	Accounting & Professional Services
Aust. Pacific Dairy Company	459215	Agricultural Investments
APD Capital	457453	Residential and Commercial Property
Focal Point Developments	452498	Residential and Commercial Property
Nexia Melbourne (Hayes Knight)	460701	Accounting & Professional Services
Aviator Capital	432803	Residential and Commercial Property
Pontier Group	439555	Residential and Commercial Property
Brinca Property Management	427277	Residential and Commercial Property
Cashel Financial Services	306803	Stockbroking and Financial Services
Linear Capital	416327	Commercial Property
Cygnets Funds Management	241095	Stockbroking and Funds Management
Cygnets Securities Australia	241095	Funds Management
APD Projects	444076	Residential and Commercial Property
State Development Fund	278742	Funds Management/Property
Title Capital	525506	Funds Management/Property
Firmus Capital	513332	Funds Management/Property
Pembroke Mortgage Investments	520040	Mortgage Funds

# Trustee & Incidental Custodian Services



Bardins provides Trustee Services to Unregistered Managed Investment Schemes

Bardins currently provides services as the trustee and/or incidental custodian of national and international trusts.



Advice/dealing by issue units in unregistered wholesale managed investment schemes (“MIS”)



Dealing on behalf of others in MIS, Derivatives & FOREX



Incidental Custodial Services



Depository Services



Dealing by issue in MIS (excl. IDPS), Derivatives



# Trustee & Incidental Custodian Services



Bardins has developed a CPMS to ensure Compliance, particularly for Authorised Representatives

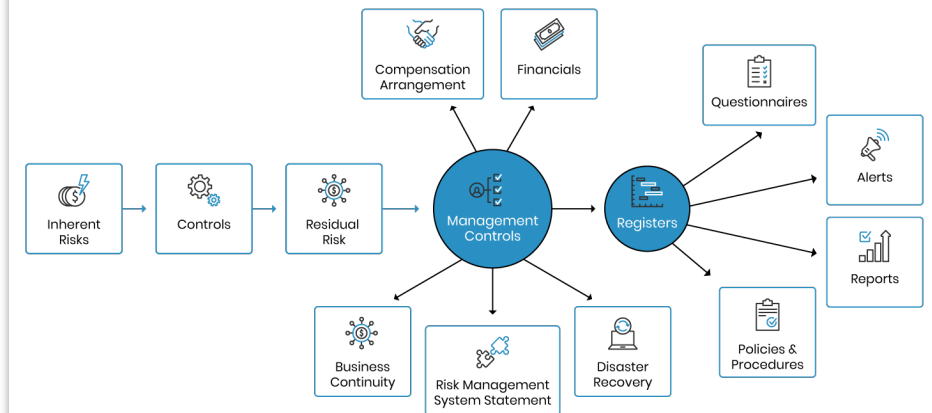


- ▶ Bardins authorises Authorised Representatives under the AFS License of Bardin Capital Pty Ltd.
- ▶ Bardins provides ongoing compliance services to ensure adherence to all the A/R's regulatory obligations
- ▶ Possessing expertise in the management of A/R's in different market sectors, Bardins provides guidance to clients in sector specific regulatory requirements:

- Insurance Broking
- Mortgage Broking
- Stockbroking
- Derivatives
- Property
- Lending
- Agriculture
- FOREX

## Compliance Management System

- To facilitate the compliance management of AFS Licensees and Authorised Representatives, Bardins has implemented RAC Pro, a proprietary online compliance management system.
- A one stop shop for all compliance needs, this system is an Enterprise Quality risk management software conforming to ISO 31000:2018/IEC 31010:2019, enabling you to manage Compliance and Risk.



# Fund Administration Services



## Bardins has a Comprehensive Partnership for Fund Admin Services



### Strong Together

- ▶ Bardins works in conjunction with external Funds Administrators, to assist in the establishment and ongoing administration of investment activities.
- ▶ Our fund administration partners possess comprehensive knowledge of compliance requirements. We've observed how this approach has led to improved outcomes for our clients and streamlined their compliance responsibilities.
- ▶ Our diverse client base has operated investment funds in multiple asset classes, including digital assets, property and real estate, and credit schemes. Whatever the asset class, Bardins can set up an integrated, one-stop solution to ensure a compliant, effective funds management vehicle.



### Role of Fund Administration

- Client Onboarding
- Verification
- Reporting on a set or ad hoc basis to investors
- Taxation Compliance and Reporting
- Fund Accounting



# ASIC RG 132: Compliance & Oversight



RG 132 outlines the key elements that constitute an effective and responsive CPMS which enables an AFS Licensee to demonstrate compliance to its relevant obligations.

## What is a CPMS?



Under RG 132 33 an integrated system comprised of written documents, functions, processes, controls and tools that help an organisation comply with its legislative requirements, industry codes, standards of good corporate governance, best practices, ethics and community expectations.



Responsible entities of registered schemes, wholesale schemes, investor directed portfolio services, manages discretionary accounts, and Australian passport funds must each have a compliance management system.



## Key features of a CPMS:

1. The context of operations
2. Relevant values, objectives and strategy
3. What compliance obligations risks and objectives exist
4. Roles and responsibilities of those people involved in the CMS
5. Organisational support required for the CMS
6. Compliance controls that will respond to the identified compliance obligations, risks and objectives
7. Appropriate documentation and record keeping
8. Monitoring and review of the CMS for continual improvement
9. Procedures dealing with non-compliance

# RAC Pro Compliance Management Platform



RAC Pro is a comprehensive compliance management, monitoring and reporting platform to assist licensees to remain up to date with regulation.

	<b>Policies &amp; Procedures (PAP)</b>	All PAP's are stored and cross-referenced to both ASIC RG's and Corporations Act provisions.
	<b>Risks</b>	Licensees can record and evaluate risks, heat data is generated allowing users to visually track areas of concern. A risk management assessment ("RMSS") in line with ISO 31010 (2019) along with corresponding policy outputs auto generated.
	<b>Obligations and Controls</b>	Licensees can set specific automated action items that apply to all the business or A/R's.
	<b>Questionnaires and Assessments</b>	Information and guidance to all A/R's questionnaires/actions can be automatically sent out, recorded and generated into a report to increase transparency and communication/feedback.
	<b>Registers</b>	Approval and management of a complete list of registers including breach, complaints, training, gifts, conflicts and more.
	<b>Meetings</b>	Module documents all meetings/agendas (video/written format) and reminders and auto generated action items.
	<b>Personnel/Messenger</b>	Application messaging enhances data security. RAC Pro facilitates both automated and manual communication streams to support sensitive communication requirements.
	<b>Document Design</b>	Customisable document design facilities enable semi-automatic, consistent, and detailed policies and reports to be generated.
	<b>Financial Monitoring</b>	Automatic calculation of relevant licensee financial obligations under RG166 including BLF, SLF, CAN and NTA plus Reporting ensures status of compliance.

# Client Reviews



Bardins has the capabilities to deliver reviews in the areas of insurance and AML/CTF.

## Insurance

- ▶ Bardins conducts compliance reviews to assist your AR's to maintain their duty to clients and their clients situation in relation to personal circumstance and risk. Bardins can provide an implementation plan to address gaps and advise broking best practice.
- ▶ We review your Exceptions reports relevant to FSG's, PDS's, premiums held in trust, unconfirmed endorsements, quotes, refunds due, closing actions etc. Have the debtor reports and aging premiums listings been actioned? Additionally, we confirm system set-up and make suggestions for best practice where applicable.

## AML/CTF

- ▶ Bardins conducts a review, constructed in line with regulatory guidance from AUSTRAC. It is designed to target both Part A and B of your AML program. This will involve liaising with your nominated AML/CTF Officer and relevant staff members, and reviewing a sample of your client onboarding.
- ▶ Bespoke, in-depth guidance on how to improve your KYC, AML policies and procedures, and regulatory interactions.
- ▶ Bardins also has the capabilities to construct or improve your AML risk register to identify your inherent AML risk and assess the effective of preventative and detective controls.

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Sole Director – Bardin Capital Pty Ltd

Sole Director – Bardin Business Consultants Pty Ltd



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