



FINEXIA'S SECURITIES BACKED LENDING
FOR PROFESSIONAL INVESTORS
INFORMATION MEMORANDUM



FINEXIA

www.finexia.com.au

FINEXIA SECURITIES
ACN 106 760 418 | ASX:FNX

Level 18, Australia Square
264 George Street
Sydney NSW 2000

IMPORTANT WARNING AND DISCLAIMER

This product is exclusively designed for institutional, qualifying professional, sophisticated, or high net worth investors and their professional consultants. Others should refrain from acting based on its contents.

Please be advised that this document contains crucial information pertaining to the risks and conflicts of interest that may arise when utilising the prime broking services (“Services”) provided by Finexia. Your engagement with our Services signifies your acknowledgment and agreement to the terms and conditions outlined herein, following a comprehensive review and understanding of the same.

GENERAL WARNING

Investing through Finexia’s platform and utilising our Services inherently involves substantial risks and is not suitable for every investor. It is imperative to understand that the value of investments can fluctuate, potentially resulting in the loss of your initial investment or even exceeding it.

LEVERAGE AND ASSOCIATED RISKS

Leverage, while amplifying gains, also exponentially magnifies losses. Engaging in leveraged trading is a high-risk activity and should be approached with caution, and only by investors who fully comprehend and can assume the associated risks.

MARKET AND TECHNOLOGICAL RISKS

Investments are invariably subject to numerous market risks, including but not limited to, currency fluctuations, market volatility, and possible illiquid markets, all of which can adversely impact investment values. Additionally, technological systems, including trading platforms, can experience failures or disruptions. Finexia does not accept liability for losses resulting from technological issues, disruptions, or errors, irrespective of whether these are the result of intentional acts.

COUNTERPARTY, SETTLEMENT, AND THIRD-PARTY RISKS

There exists a risk that counterparties may default on their obligations, potentially resulting in financial loss

to you. Furthermore, Finexia may engage third-party service providers and, despite our diligent selection process, we do not assume responsibility for any losses incurred due to the failure or actions of third parties.

CONFLICTS OF INTEREST AND REGULATORY RISKS

Conflicts of interest may emerge between Finexia, our clients, or between different clients. While we have policies to manage conflicts of interest, we cannot assure that these will always prevent harm or loss to clients. Additionally, changes in legal, tax, and regulatory frameworks can impact your account and investment strategy, and it is your obligation to comprehend all legal and regulatory requirements pertinent to your investments.

NO GUARANTEES AND TAX LIABILITIES

Finexia does not guarantee profits or safeguard against losses. Historical performance is not indicative of future results. Moreover, you are solely responsible for managing and fulfilling any tax obligations that arise from your use of our Services, as Finexia does not provide tax advice.

INDEMNITY AND AMENDMENTS

You agree to indemnify Finexia against any loss, liability, claim, damage, and expense arising from or related to your use of our Services that is not the direct result of gross negligence, intentional misconduct, or fraud by Finexia. Furthermore, Finexia reserves the right to amend this warning and disclaimer at any time, with amendments effective upon publication on our website.

Should you have any questions or require further clarification regarding this warning and disclaimer, please do not hesitate to contact our Customer Service Team at Finexia.

CONTENTS

IMPORTANT WARNING AND DISCLAIMER

EXECUTIVE SUMMARY

KEY FINEXIA'S SECURITIES BACKED LENDING
FEATURES

VISION

OUR POINT OF DIFFERENCE

FINEXIA SECURITIES BACKED LENDING SOLUTION

MARKET AND CURRENT LANDSCAPE

FINEXIA EXPERTISE

MANAGEMENT TEAM

TAX

RISK ASSESSMENT

DISCLOSURES

GENERAL INFORMATION

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EXECUTIVE SUMMARY

Executive Summary: Finexia's Securities Backed Lending

Finexia's Securities Backed Lending stands out as a versatile and efficient financial tool for investors seeking to leverage their ASX-listed equity holdings without sacrificing their investment strategy, offering a combination of flexibility, speed, and competitive terms.

Product Overview:

Finexia offers a unique financial product, the Finexia's Securities Backed Lending, specifically designed for individuals holding ASX-listed shares. This innovative service provides a strategic solution for accessing liquidity without the need to liquidate shareholdings, thus maintaining investment positions.

Target Audience:

Senior Executives with Restricted Share Sales: Our solution is perfect for senior executives or company insiders who are restricted from selling shares in their companies. Unlock the equity in your share portfolio without having to sell your shares, thereby maintaining your investment positions and meeting any regulatory or company-imposed restrictions on share disposals.

Investors Seeking Immediate Liquidity: For those needing to access cash without the hassle of liquidating their investment portfolio, Finexia's Securities Backed Lending offers a quick and efficient solution. A quick turnaround (settlement within 5 days), a simple application process and an expansive universe of accepted collateral (ASX listed shares) makes the Finexia's Securities Backed Lending the solution of choice for the smart investor.

What Sets Finexia Security Backed Lending Apart from a Traditional Margin Loan?

1. **Unrestricted Loan Purpose:** With Finexia's Securities Backed Lending, you're not bound by how you can use the loan proceeds, giving you greater financial freedom.
2. **Broad Range of Accepted Collateral:** We accept a wider array of stocks and offer diverse Loan-to-Value Ratios (LVRs), catering to a wider range of investment strategies.
3. **Swift Processing:** At Finexia, we prioritise efficiency, ensuring fast processing of your loan.
4. **Tailored Credit Assessment:** Our credit evaluation is based exclusively on the quality of the collateral (ASX-listed) provided by your portfolio.
5. **Competitive Pricing:** Our pricing structure is designed to be competitive and more flexible than traditional Margin Lending facilities.

Simple Application Process

- 1: Initial assessment of the proposed stock to be lodged as collateral and the indicative loan amount.
- 2: Term Sheet provided outlining the specific loan facility being offered by Finexia. This will include a formal acceptance from you.
- 3: Client Account application provided for you to complete and execute.
- 4: Drawdown. Funds deposited to your nominated Bank Account.

Discover the Finexia difference and unlock more possibilities with your investments.

FINEXIA'S SECURITIES BACKED LENDING **KEY FEATURES**

Finexia's Securities Backed Lending offers a unique lending-focused approach, enabling clients to secure loans against their share portfolios, thus providing essential liquidity while allowing them to retain their investment assets.

NAME:

Finexia's Securities Backed Lending

Who is Finexia Listed Equities for?

Senior Executives with Restricted Share Sales: Our solution is perfect for senior executives or company insiders who are restricted from selling shares in their companies. Unlock the equity in your share portfolio without having to sell your shares, thereby maintaining your investment positions and meeting any regulatory or company-imposed restrictions on share disposals.

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Why Choose Finexia's Securities Backed Lending?

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-

The Finexia's Securities Backed Lending offers fast liquidity, flexible usage, and competitive terms.

OUR VISION

Finexia's Securities Backed Lending provides secure loans against your listed shares, granting you access to much-needed liquidity without the hassle of selling your investments.

Finexia aspires to be the top financial ally for SMEs

Finexia is distinguishing itself from the mainstream by specifically targeting the SME lending market. Without the traditional infrastructure of established banks, Finexia can craft solutions that offer value to both clients and the Company at a reduced operating expense.

Finexia aims to be the premier hub for SME finance products and services, leveraging the latest technology to address client demands. Building on its existing model, Finexia will provide value-added, profitable services efficiently and cost-effectively across a comprehensive spectrum of financial services, including lending, banking, alternative financing, investment, and wealth management.

Finexia maintains robust relationships with lenders, distributors, and investment management firms and plans to optimise the advantages of these partnerships for clients without incurring unnecessary expenses.

OUR POINT OF DIFFERENCE

Emphasising our commitment to efficiency and client convenience, we proudly offer lending services based on portfolio values. With Finexia, clients can confidently expect the cash to be deposited in their specified bank accounts within just 5 days, showcasing our dedication to swift and reliable financial support.

Our clients enjoy the freedom to manage their finances with confidence.

Finexia's Securities Backed Lending service is a standout offering in the market, primarily due to its high-quality loans secured by ASX-listed shares and a range of borrower-friendly features. One of the key advantages of this service is the unrestricted loan purpose. Unlike many other lending services, Finexia allows borrowers complete freedom in how they use their loan proceeds. This flexibility provides clients with greater financial freedom, enabling them to allocate funds according to their personal or business needs without any constraints.

In addition to this flexibility, Finexia's service is notable for its broad acceptance of collateral. The company accepts a wide array of stocks and offers diverse Loan-to-Value Ratios (LVRs). This approach caters to a broader range of investment strategies, making it suitable for various types of investors. Whether clients have conventional or more diverse portfolios, Finexia's accommodating stance on collateral makes it an attractive option for many.

Efficiency is another hallmark of Finexia's service. The company prioritises swift processing of loans, understanding the importance of time in financial dealings. This focus on efficiency ensures that clients can access the funds they need promptly, which is crucial for those who require quick financial solutions.

The credit assessment process at Finexia is also worth noting. It is tailored and based exclusively on the quality of the collateral, specifically the ASX-listed shares in the borrower's portfolio. This specialised approach can be particularly beneficial for those with strong portfolios, as it often leads to quicker loan approvals compared to more traditional, comprehensive credit evaluations.

Lastly, Finexia's competitive pricing structure sets it apart from traditional Margin Lending facilities. The company has designed its pricing to be both competitive and flexible, offering value to clients seeking financial solutions that align with their investment strategies and financial goals.

Overall, Finexia's Securities Backed Lending service stands out for its combination of unrestricted loan usage, a wide range of accepted collateral, swift processing, tailored credit assessment, and competitive pricing. These features collectively position Finexia as a leading provider in personalised financial services, offering a level of autonomy and flexibility highly valued by sophisticated investors and borrowers.

FINEXIA'S SECURITIES BACKED LENDING SOLUTION

Finexia's Securities Backed Lending Model

Clients have the opportunity to secure loans by using their shareholdings as collateral. This allows them to access liquidity without having to sell off their investments, maintaining their positions in the market and withdraw the cash for whatever they need.

Simple Application Process

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What Sets Finexia Equities Loan Apart from a Traditional Margin Loan?

- 1. Unrestricted Loan Purpose:** With Finexia's Securities Backed Lending, you're not bound by how you can use the loan proceeds, giving you greater financial freedom.
- 2. Broad Range of Accepted Collateral:** We accept a wider array of stocks and offer diverse Loan-to-Value Ratios (LVRs), catering to a wider range of investment strategies.
- 3. Swift Processing:** At Finexia, we prioritise efficiency, ensuring fast processing of your loan.
- 4. Tailored Credit Assessment:** Our credit evaluation is based exclusively on the quality of the collateral (ASX-listed) provided by your portfolio.
- 5. Competitive Pricing:** Our pricing structure is designed to be competitive and more flexible than traditional Margin Lending facilities.

FINEXIA'S SECURITIES BACKED LENDING SOLUTION

Finexia is a credit provider regulated by the AFSL, providing tailored financing options to its clients.

Delivering financial, banking, and investment solutions to the SME sector, empowering them to excel in the current economic environment.

DIVERSE LENDING

Finexia serves as a pivotal access point for SMEs, CEOs, Executives, and High Net Worth and Sophisticated individuals to secure essential funding from a single platform. Finexia showcases a varied lending portfolio to meet diverse needs.

BUSINESS ACCOUNTS FOR ALL

Finexia is expanding its services to offer business accounts tailored not just for SMEs, but also for CEOs, Executives, and affluent individuals. Designed for maximum efficiency and cost-effectiveness, these accounts come with intuitive, adaptable features that integrate effortlessly with accounting tools, enabling clients to focus on their core mission.

INVESTMENT STRATEGIES & ALTERNATIVE FINANCE

The experts at Finexia bring a vast spectrum of financial services knowledge. Leveraging this expertise, Finexia is rolling out a holistic financial suite, offering a range of alternative financing and investment solutions tailored to the diverse demands of its clientele, from SMEs to high net worth individuals.

MARKET & CURRENT LANDSCAPE

Finexia has established a presence in a segment of the economy that is underserved by lenders yet presents immense potential for economic expansion. By addressing the needs of this sector, both Finexia and its clients can tap into this vast opportunity.

The Australian SME funding gap is estimated at A\$94.3 billion, indicating a notable deficit in financing available to SMEs, potentially hindering their growth.

SMEs are the backbone of the Australian economy, accounting for nearly 100% of all businesses, two-thirds of all employment, and half of the country's GDP. However, many SMEs face barriers in accessing finance from traditional lenders.

The small business lending process at most banks in Australia is still relatively manual and can be inefficient and expensive. As a result, the average conversion rate for loans to SMEs from traditional lenders is around 20%.

In recent years, there has been a growing number of alternative finance providers in Australia that offer faster and more flexible financing options for SMEs. Around 1.1 million Australian small and micro businesses currently access funding from alternative finance sources, with an average loan size of A\$150,000. Another 25,000 larger Australian SME businesses borrow between A\$500,000 and A\$1 million from alternative finance providers.

FINEXIA **EXPERTISE**

Finexia offers a variety of lending options that are customisable and can be integrated, ensuring clients obtain all their financing needs from a single source.

A strategy for expanding the loan solutions and to give clients more options.

Many finance providers specialise in singular products, but businesses frequently need diverse solutions combined, which Finexia can amalgamate through its distinctive and innovative offering.

Finexia possesses expertise in property and asset financing, business development lending, and short-term cash flow funding across all primary market sectors, anchoring its lending by securing assets with substantial value.

MANAGING LENDING RISK

As a lender backed by assets, Finexia safeguards its loans by securing them against assets, with a predominant emphasis on property, shares or leases as collateral. While considering the value of the underlying assets, Finexia also prioritises affordability, ensuring as a conscientious lender that clients possess the cash flow for debt repayment.

LENDING DECISIONS

Finexia employs rigorous credit underwriting procedures, scrutinising aspects like trading history, credit background, and default risk. This includes evaluating the worth of assets proposed for security, considering their economic resale value and prospective depreciation. All lending decisions undergo credit committee review before approval, with escalations adhering to set guidelines.

PORTFOLIO MANAGEMENT

Finexia mitigates risk by diversifying its loan book across various projects and borrowers. When operating at full lending capacity, no single client constitutes more than 5% of the entire portfolio. By leveraging its lending partners' capabilities, loans issued by Finexia typically amount to four times its own funds deployed, significantly amplifying the foundational investment value.

MANAGEMENT TEAM

Uniting specialists from diverse domains



Patrick Bell

Pat is the CEO & Director of Finexia Securities and is an experienced Corporate Finance executive, having lead Corporate Banking teams for a 'Big 4' Bank for over 10 years with nearly 20 years in Financial Services.

With this level of experience and exposure Pat has a very broad range of expertise in most industries and financing scenarios and has an outstanding record of getting the impossible done! (Or "of championing and completing complex transactions"). He has a particular passion for all types of property finance; development, investment and tourism, the sectors that support our ageing population and assisting clients to achieve their growth aspirations.



Neil Sheather

Executive Chairman of Finexia Financial Group (ASX code: FNX), Neil has been in his current role for the past 7 years. He was instrumental in Finexia listing on the Australia Securities Exchange (ASX) in 2015.

Neil has over 25 years' experience in the financial service sector focused mostly on the equity capital markets, raising capital and trading equities and derivatives in Australia and Hong Kong.



Scott Beeton

Scott brings over 20 years of management experience in the finance sector, with expertise across superannuation, funds management, stockbroking, and fintech.

He has served as a director for several ASX-listed companies and held senior roles in various AFSLs. Notably, he founded Sequoia Financial Group Limited (ASX:SEQ), scaling it to achieve an annual revenue of over \$147M and an EBITDA of \$12.4M in FY22.

TAX

Finexia's tax disclosure offers a general guide on tax implications from our Prime Broking services, not tax advice.

We Encourage All Clients to Seek Expert Tax Advice to Navigate the Specifics of Income Tax, CGT, and GST with Precision and Compliance.

This tax disclosure document is intended to provide a general overview of the tax implications that may arise from utilising the services offered by Finexia. This document does not constitute tax advice and is provided for informational purposes only. Clients are strongly encouraged to seek professional advice from a qualified tax advisor to understand the specific tax implications arising from the use of our services.

GENERAL TAX IMPLICATIONS

- *Income Tax*: Profits derived from trading activities through Finexia may be subject to income tax. The tax treatment of trading profits is subject to the individual circumstances of each client.
- *Capital Gains Tax (CGT)*: Clients may be subject to CGT on gains realised from the sale of investments. The rate of CGT and the availability of discounts or exemptions depend on the client's individual circumstances.
- *Goods and Services Tax (GST)*: The provision of financial services, including Prime Broking services, may be subject to GST. Clients should consider the GST implications of their trading activities.

TAX REPORTING OBLIGATIONS

Clients are responsible for their own tax affairs, including complying with all relevant Australian tax laws and regulations. This involves:

- Reporting all income, gains, and losses to the Australian Taxation Office (ATO).
- Ensuring that all tax payments are made in a timely manner.
- Maintaining accurate records of all trading activities.

Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS) Clients who are tax residents outside of Australia may have additional reporting obligations under international tax compliance regimes such as FATCA and CRS. Finexia may be required to collect and report certain information about clients' tax residency status to the ATO.

DISCLAIMER

This document is not exhaustive and does not cover all possible tax implications related to the Prime Broking services offered by [Your Company Name]. Tax laws and regulations are subject to change, and the application of such laws can vary widely based on the specific facts and circumstances involved.

RISK ASSESSMENT

The risks associated with Prime.

REGULATORY COMPLIANCE RISK

Legal Compliance:

- Risk: Non-compliance with ASIC (Australian Securities and Investments Commission) regulations and other relevant laws.
- Mitigation: Regular audits, hiring a compliance officer, and continuous training on regulatory changes.

Data Protection:

- Risk: Breach of data protection laws, such as the Australian Privacy Principles (APPs).
- Mitigation: Implement robust cybersecurity measures, data encryption, and regular data protection training for staff.

OPERATIONAL RISK

Technology Failure:

- Risk: System downtimes, cybersecurity attacks, or technological failures affecting operations.
- Mitigation: Invest in reliable technology, have a cybersecurity policy, and establish a disaster recovery plan.

Human Error:

- Risk: Mistakes made by employees leading to financial or reputational damage.
- Mitigation: Implement thorough training programs, establish clear protocols, and use technology to automate where possible.

MARKET RISK

Market Volatility:

- Risk: Losses due to changes in market prices, rates, or indices.
- Mitigation: Diversify investments, employ hedging strategies, and continuously monitor market conditions

Liquidity Risk:

- Risk: Inability to meet short-term financial demands due to insufficient liquid assets.
- Mitigation: Maintain a sufficient liquidity buffer and manage assets and liabilities effectively.

CREDIT RISK

Counterparty Risk:

- Risk: Losses due to a client or counterparty failing to meet contractual obligations.
- Mitigation: Conduct thorough client assessments, establish credit limits, and monitor client financial health.

Concentration Risk:

- Risk: High exposure to a particular asset, market, or counterparty.
- Mitigation: Diversify assets and counterparties and monitor concentration levels.

REPUTATIONAL RISK

Client Satisfaction:

- Risk: Damage to reputation due to client dissatisfaction or public scandals.
- Mitigation: Ensure excellent customer service, transparent communication, and handle complaints effectively.

Negative Publicity:

- Risk: Adverse media coverage affecting the firm's reputation.
- Mitigation: Develop a crisis communication plan and engage in positive PR activities.

STRATEGIC RISK

Competitive Pressure:

- Risk: Loss of market share due to increased competition or inability to adapt to industry changes.
- Mitigation: Continuously innovate, understand market trends, and adapt the business model accordingly.

Investment Strategy:

- Risk: Poor investment decisions leading to financial losses.
- Mitigation: Employ experienced investment managers, and ensure a robust investment strategy and policy.

ENVIRONMENTAL AND SOCIAL RISK

Environmental Impact:

- Risk: Legal and reputational risks due to negative environmental impacts.
- Mitigation: Adopt sustainable practices and comply with environmental regulations.

Social Responsibility:

- Risk: Criticism or legal action due to socially irresponsible practices.
- Mitigation: Engage in corporate social responsibility (CSR) activities and ensure ethical practices.

This risk assessment provides a foundational framework for identifying and mitigating risks in Finexia's Prime. It is crucial to conduct a detailed and specific risk assessment tailored to the exact nature, scale, and complexity of the prime broking business, considering all relevant internal and external factors.

Navigates the
Complex Landscape
of Regulatory,
Operational, and
Market Risks

DISCLOSURES

Service Disclosure

A tactical strategy
for expanding
the loan portfolio
and maximising
returns.

This disclosure ("Disclosure") is provided to you in connection with the services ("Services") offered by Finexia ("we", "us", or "our"). By using our Services, you acknowledge and agree to the terms set forth in this Disclosure.

NATURE OF SERVICES

Our prime broking services include, but are not limited to, securities lending, financing, trade execution, and custody services. The specific services provided to you will be detailed in the service agreement entered into between you and us.

RISKS

Engaging in prime broking activities carries inherent risks. These risks include, but are not limited to, market risk, credit risk, operational risk, and liquidity risk. It's essential to understand these risks before utilising our Services.

FEES AND CHARGES

We may charge fees for our Services. All fees and charges will be transparently communicated to you in advance and will be detailed in the service agreement.

CONFLICTS OF INTEREST

We may have business relationships or other interests that could present conflicts of interest. We will take reasonable steps to identify, manage, and disclose any conflicts of interest that may arise.

CLIENT ASSETS

Any assets you provide to us as part of our Services will be held in accordance with applicable laws and regulations. We will take reasonable steps to safeguard your assets, but it's essential to understand that all investments carry risks.

DATA PROTECTION

We are committed to protecting your personal and financial information. We will handle your data in compliance with applicable data protection laws and our privacy policy.

REGULATORY INFORMATION

Finexia is regulated by ASIC. Our regulatory status can be verified by contacting ASIC.

COMPLAINTS

If you have any complaints regarding our Services, please contact our complaints department at info@finexia.com.au. We are committed to addressing any concerns promptly and fairly.

AMENDMENTS

We reserve the right to amend this Disclosure from time to time. Any changes will be communicated to you in advance.

GOVERNING LAW

This Disclosure and any disputes arising out of it will be governed by the laws of Australia

ACKNOWLEDGMENT

By using our Services, you acknowledge that you have read, understood, and agreed to this Disclosure.

HOW TO APPLY FOR **FINEXIA'S SECURITIES BACKED LENDING**

Below is a step-by-step guide to help you navigate through the application and set up your account with us.

1 Review the Information Memorandum
Understand the Offering: Ensure you have read and understood the Information Memorandum, including the services offered, fees, risks, and terms and conditions.
Consult with Professionals: We recommend discussing with your financial advisor, legal counsel, and tax consultant to understand the implications of utilising our Prime Broking services.

2 Eligibility Check
Client Type: Ensure that you meet the eligibility criteria to become a client, which may include being a wholesale, professional, or institutional investor.
Compliance: Ensure you are compliant with the regulatory and legal requirements applicable in your jurisdiction.

3 Gather Required Documentation
Prepare the necessary documentation for account setup, which may include:

- Proof of Identity (e.g., passport, driver's license)
- Proof of Address (e.g., utility bill, bank statement)
- Financial Statements
- Tax Identification Number (TIN)
- Corporate Documentation (if applying as a business entity)

4 Complete the Application Form
Access the Form: Contact us to access the application form or contact our client services team at info@finexia.com.au to request a physical copy.
Fill in Details: Ensure all sections of the application form are completed accurately.
Attach Documentation: Attach all required documentation as specified in the application form.

5 Submit Your Application
Online Submission: If applying via email, submit the form and attachments via email.
Postal Submission: If applying via post, send the completed application form and copies of the required documents to: PO BOX 8227 GC Mail Centre 9726..

6 Application Review
Verification: Our team will review your application and verify the provided documentation.
Additional Information: We may contact you if additional information or clarification is needed.

7 Account Activation
Approval Notification: Upon approval of your application, you will receive a confirmation email with your account details.
Accessing Your Account: Follow the instructions provided in the confirmation email to access your new Prime Broking account.

8 Ongoing Support
Dedicated Account Manager: You will be assigned an account manager to assist you with your ongoing needs.
Client Services: Our client services team is available to assist you with any inquiries or support.

Important Notes

Ensure all information provided during the application process is accurate and truthful.
Keep your account details and login credentials secure.
Monitor your account regularly and inform us immediately of any unauthorised activities.

GERNERAL INFORMATION

Authorisation

The services of Finexia's Securities Backed Lending will be duly authorised by a resolution of the Board of Directors of Finexia Financial Group.

Documents Available

Following the date of this Offering Document, copies of the following documents will be available for inspection on reasonable notice:

- Finexia's Securities Backed Lending Memorandum
- Finexia's Securities Backed Lending Brochure

Personal Data

Personal data gathered through this exercise or otherwise in the course of Finexia Financial Group's will never be used for marketing purposes. Finexia Financial Group undertakes not to transfer the personal data to any third parties except when required by law, pursuant to an agreement with a service provider to Finexia Financial Group or with the prior consent of the relevant Investor. Each Investor is entitled to access its personal data and may ask for a rectification thereof in cases where such personal data is inaccurate and/or incomplete. Investors may contact the Registrar and Finexia Financial Group in this regard.

Personal data shall not be retained for periods longer than those required for the purpose of their processing subject to any limitation periods imposed by law.



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