SPIRE CAPITAL

SPIRE CAPITAL LTD · AFSL 344365

Financial Services Guide

Date of issue: 30 September 2026

Spire Capital Ltd ABN 21 141 096 120

Suite 30.03, Australia Square, Level 30, 264-278 George Street, Sydney NSW 2000

This FSG is issued on 30 September 2026 by Spire Capital Ltd, AFSL 344365.

Office	Suite 30.03 Australia Square Level 30, 264-278 George St, Sydney, New South Wales 2000

Statement of purpose

This Financial Services Guide (**FSG**) is an important document, which we are required to give you under the requirements of our Australian Financial Services Licence (**AFSL**) and the Corporations Act 2001 (Cth). It provides you with information about Spire Capital Ltd (**Spire**, **we**, **us** or **our**) to help you decide whether to use the financial services and products we provide.

This FSG provides you with important information about us and:

- the financial services we are authorised to provide and the financial products to which those financial services relate;
- how we are remunerated;
- any arrangements which may influence our advice to you;
- how we protect your privacy; and
- how to make a complaint and access our internal and external dispute resolution procedures.

It is important that you read the FSG in conjunction with the Fund PDS, so that you can make an informed decision about whether to apply for or utilise the financial services we offer.

Our Funds

Spire is the Investment Manager of the Spire Global Markets Portfolio Fund (Responsible Entity: Ironbark Asset Management (Fund Services) Limited) and the Spire Multifamily Growth and Income Fund (Responsible Entity: Equity Trustees Limited), together the **Funds**. The respective Responsible Entities are the issuers of the interests in each Fund. Spire also manages other funds and mandates that are available only to wholesale clients. This FSG relates only to the financial services we provide to you as a retail client in connection with the abovementioned Funds.

Product Disclosure Statement and Statement of Advice

Before you invest in financial products, you will be provided with a Product Disclosure Statement (**PDS**). This sets out the benefits, risks, costs and other important information about the financial product you are investing in. You should ensure that you read any warnings contained in the PDS carefully before making any decision to invest.

If you have engaged a financial adviser, you may receive a Statement of Advice (**SoA**) from that adviser.

About Spire

Spire holds an Australian Financial Service Licence (AFSL No: 344365) issued by the Australian Securities and Investment Commission (**ASIC**).

In providing our financial services to you, Spire, as an AFSL holder, does not act on behalf of any other person.

Contact details

Website	https://spirecapital.com.au/
Mail	Australia Square Level 30, Suite 3/264-278 George St, Sydney, New South Wales 2000
Phone	+612 9047 8800
Email	info@spirecapital.com.au

Our compensation arrangements

The law requires us to have arrangements in place to compensate retail clients for losses or damage they suffer from breaches of financial services laws by Spire or its representatives. Spire has internal compensation arrangements as well as professional indemnity insurance that satisfies its obligations under section 912B of the Corporations Act 2001 (Cth).

Our arrangements extend to representatives who were previously employed by us and provided financial services in that capacity.

The financial services we may provide to retail clients

Spire may provide general financial product advice in relation to managed investment schemes, including investor directed portfolio services, securities; to retail clients.

General Advice Warning

Any general financial product advice we provide to you does not take into account your objectives, financial situation or needs. Because of this, before acting on any general advice, you should consider its appropriateness having regard to your own objectives, financial situation and needs, and read the relevant PDS for the Fund. Spire is not authorised to provide, and does not provide, personal advice, and nothing in this FSG or in any general advice we give should be taken as a recommendation that any financial product is suitable for your particular circumstances.

Spire's remuneration arrangements

Spire may receive remuneration, including management fees, costs and performance fees, in respect of our investment management activities for the Funds.

The following subheadings explain the remuneration we may receive.

Management Fees and Costs

The Responsible Entities of each Fund charge a management fee, which is calculated as a percentage of the net asset value of the Funds, accrued daily and paid from the Fund's assets monthly in arrears. It is reflected in the unit price rather than charged to you directly.

The Responsible Entities pay us out of that fee for acting as the investment manager of each Fund. Our role includes selecting and managing each Fund's investments in accordance with its investment strategy, PDS and Constitution. The amount we receive is a portion of the management fee; the Responsible Entities retain the remaining balance for their own roles as responsible entity and issuer of each Fund.

For full details regarding the fees, costs and expenses of each respective Fund, please refer to the specific Fund's PDS, which is available on Spire's website.

Performance Fees

Spire is not paid a performance fee, and we are not entitled to any payment from either Fund that is calculated by reference to that Fund's investment performance.

However, each Fund gains its investment exposure through underlying investments, and those underlying investments may charge performance fees to their own direct investors. Where a performance fee is charged at that level, the Fund bears its share of performance fees as an indirect cost. This reduces the net asset value of the Fund and therefore the value of your investment.

As these fees are dependent on the future performance of the underlying investments, refer to the respective PDS of the relevant Fund to see estimates based on past periods which includes our reasonable estimates.

Remuneration to Our Employees

Spire's employees are paid a salary and other remuneration and benefits from us, such as bonuses, where permitted by law. These are based upon individual performance, behaviour, risk management, compliance and conduct.

Remuneration to Other Persons

Subject to law, where we pay a fee or give a benefit in relation to a referral or introducer, we will make a separate disclosure to you. We may make payments in the ordinary course of our business to platform providers in order to host and distribute our Fund products on their platforms.

Privacy

Spire is committed to protecting your privacy. We collect, hold, use and disclose your personal information in order to provide our financial services to you. The purpose of our Privacy Policy is to ensure that you understand the ways in which we collect, maintain use, and disclose your personal information and how we comply with the Australian Privacy Principles (**APPs**) under the Privacy Act 1988 (Cth).

Our Privacy Policy is available on website at https://spirecapital.com.au/.

Complaints

If at any time you are not satisfied with services provided by Spire, you may take the following steps:

1. Contact us over the phone, or in writing, and advise us about the nature of your complaint, the relevant Fund and what outcome you are seeking.
   You may contact Spire Complaints on +612 9047 8800 or send your complaint in writing to info@spirecapital.com.au.
2. We will acknowledge your complaint within one (1) business day, or as soon as practicable.
3. If your complaint is not satisfactorily resolved within five (5) days, we are required to provide an internal dispute resolution (**IDR**) response to you.
4. Spire will always attempt to resolve your complaint efficiently, honestly and fairly. If the complaint is complex in nature, Spire may take an extended period of time to thoroughly investigate the complaint. This period may be up to thirty (30) days.
5. If you are dissatisfied with the outcome, you have the right to lodge a complaint with the Australian Financial Complaints Authority (**AFCA**), an approved external dispute resolution scheme, of which Spire is a member.

AFCA's contact details can be found below:

Australian Financial Complaints Authority (AFCA)

Mail	GPO Box 3, Melbourne VIC 3001
Phone	1800 931 678
Website	https://www.afca.org.au/make-a-complaint
Email	info@afca.org.au