

FINANCIAL SERVICES GUIDE PART 1

9 November 2015

This Financial Services Guide has been authorised for distribution by the authorising licensee:

Securitor Financial Group Ltd ('Securitor')

ABN 48 009 189 495

Australian Financial Services Licence No. 240687 ('AFSL')

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This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Securitor Financial Group Ltd ('Securitor' or 'Licensee'), and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Securitor;
- Securitor as the holder of an AFSL;
- the financial services that Securitor offer;
- the process we follow to provide financial services;
- how we, our associates, and Securitor are paid;
- any arrangements which may influence our advice to you;
- how we and Securitor protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Securitor. References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Securitor or your Authorised Representatives of Securitor, as the context requires.

PART 1

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

ABOUT SECURITOR

Securitor is a Professional Partner of the Financial Planning Association of Australia (FPA).

Securitor is a wholly owned subsidiary of Asgard Wealth Solutions Limited, which is a subsidiary of the Westpac Group. The Westpac Group includes a number of companies that provide financial products and services, funds management, insurance, superannuation, investment and administrative services. The Westpac Group includes Advance Asset Management Ltd, Asgard Capital Management Ltd ('Asgard'), Ascalon Capital Managers Ltd, St.George Life Ltd, BT Funds Management Ltd, BT Funds Management No.2 Ltd, BT Portfolio Services Ltd, BT Securities Ltd, BT (Queensland) Pty Ltd, BT Life Ltd, Westpac Banking Corporation ('Westpac'), Westpac Life Insurance Services Ltd, Westpac Securities Administration Ltd, Westpac General Insurance Ltd, Westpac Securities Ltd, Westpac Financial Services Ltd, Westpac Funds Management Ltd, Hastings Funds Management Ltd and other entities bearing the 'Westpac', 'St.George', 'BT' and 'Asgard' names.

While we have access to a broad range of products and platforms, we are likely at times to recommend products from members of the Westpac Group. However, we will need to be satisfied that if we make a recommendation involving one of these products, that it is in your best interests for us to do so.

SECTION 1: FINANCIAL SERVICES GUIDE

WHAT OTHER INFORMATION SHOULD YOU CONSIDER BEFORE DECIDING WHETHER TO PROCEED WITH OUR RECOMMENDATIONS?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

WHO PROVIDES THE FINANCIAL SERVICES DESCRIBED IN THIS FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Securitor.

Part 2 of this Guide contains further details about your financial adviser, and our experience, qualifications and professional memberships.

WHO IS RESPONSIBLE FOR THOSE FINANCIAL SERVICES?

As the holder of an AFSL, Securitor is responsible for the financial services we provide to you. Securitor acts on its own behalf when these financial services are provided to you.

In relation to the financial services offered in this FSG, Securitor, as the holder of an AFSL, does not act on behalf of any other person or licensee. Securitor is only responsible for the services offered in the FSG.

The law requires Securitor to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Securitor and/or its Authorised Representatives. Securitor has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

WHAT FINANCIAL SERVICES DO WE OFFER?

Securitor is able to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide) including:

- deposit products;
- government debentures, stocks or bonds;
- life investment and life risk products;
- managed investment schemes including investor directed portfolio services;
- standard margin lending facilities;
- derivatives;
- retirement savings account products;
- securities (e.g. shares); and
- superannuation products.

Some of the services you are able to access through Securitor include:

- financial planning advice;
- wealth accumulation advice;
- superannuation advice, including self managed superannuation funds;
- redundancy advice;
- retirement advice;
- gearing strategies;
- cash flow advice;
- social security benefits advice;
- life and disability insurance advice;
- managed discretionary account services; and
- estate planning services (financial planning).

WHAT PRODUCTS ARE AVAILABLE?

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available products we can recommend are contained in the Approved Product List (APL).

Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from. We conduct due diligence on external research report providers that provide us with research.

We will only recommend a product to you after considering its appropriateness to your individual objectives, financial situation and needs. The recommendations will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product which is not on the APL.

Securitor has established a Risk Partner Program with various life insurance underwriters, which provides support and resources to assist us in the delivery of life insurance advice.

HOW DO WE ENSURE THAT THE ADVICE WE GIVE YOU SUITS YOUR NEEDS AND OBJECTIVES?

To ensure we provide advice suitable for your needs and financial circumstances, we firstly need to understand your financial situation, personal financial objectives and needs. We will follow a step-by-step process as outlined below:

- 1.) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
- 2.) We will collect all the information we need from you, including your personal financial situation, financial objectives and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing your full personal information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.
- 3.) We will help you identify your goals and may discuss your attitude towards investment risk.
- 4.) We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where required we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, a RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice. Where we recommend financial products, we will provide you with a Product Disclosure Statement (PDS) or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to purchase that product.
- 5.) We will discuss our recommendations with you, make any changes you require and gain your agreement to implement those recommendations.
- 6.) We will then implement those recommendations.
- 7.) We will meet with you periodically to review your financial circumstances if we agree to an ongoing advice service arrangement which includes a regular review component. If an ongoing advice service arrangement is entered into, this will be documented in your Ongoing Advice Service Arrangement Letter and/or SoA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via a SoA or RoA, as outlined above. These circumstances may include:

- 1.) Where we provide you with only general advice, such as through seminars and newsletters;
- 2.) When we are acting under a Managed Discretionary Account (MDA) service which allows us to manage investments on your behalf, once you have accepted this service in a SoA;

- 3.) Further advice or verbal advice – if you previously received advice recorded in a SoA, any further personal advice provided by us may be recorded in a RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below).

WHAT DOCUMENTS DO YOU GET IF WE PROVIDE FURTHER ADVICE?

Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with a SoA for this further advice. Where this is the case, if you have not already been provided with a RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this Guide) for a period of seven years from when the further advice was first provided to you.

HOW CAN YOU INSTRUCT US?

You may specify how you would like to give us instructions, for example, by phone, fax or email, using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

OTHER SERVICES

We may provide services other than financial planning services. For example, we may also act as your accountant or legal adviser, or advise you on real estate investments or your finance needs (performing credit activities for you). While we may provide these other services, you should understand that these other services are not provided under Securitor's AFSL and Securitor does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

Examples of the services which Securitor is not responsible for include:

- general insurance services (e.g. car insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- consulting services; and
- credit activities.

HOW ARE WE PAID FOR OUR SERVICES?

We and Securitor may receive:

- fees paid by clients;
- commissions paid by product providers;
- other payments by product providers; and
- other benefits.

Fees and commissions are payable (as directed by your Authorised Representative) to any of Securitor, your Authorised Representative, Corporate Authorised Representative or to any other approved party. We may receive up to 100% of any fees and commissions received.

Details of any fees, commissions or other benefits that we, Securitor or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

WHAT TYPE OF FEES, COMMISSIONS, PAYMENTS AND OTHER BENEFITS DO WE RECEIVE FOR OUR SERVICES?

The types of fees, commissions and other benefits that may be received by us and by Securitor include the following:

Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

Referral fees

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the products involved. We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods.

Where it is debited from your investments, it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

Commissions

If you take out a financial product through us, Securitor may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees, premiums and interest rate (in the case of margin loans) you pay for the product. This is not an additional cost to you. We may agree to rebate some or all of these.

The commission payable for different classes of financial products include the following:

Investment Products

For investment products, including superannuation and annuities, commissions are generally deducted from the funds you invest. Commissions on investment products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you acquire an investment product before 1 July 2014, commissions may be payable where Securitor had an existing arrangement with the product issuer prior to 1 July 2013.

Securitor may receive between 0% and 1% of your initial investment as initial commissions from product providers whose products are recommended to you. Securitor may also receive ongoing commissions from the management fees of the product providers.

Ongoing commissions range between 0% and 1% p.a. of your investment balance. Securitor may pass up to 100% of these commissions to us.

Example

We recommend you invest \$10,000 in an investment product. The applicable initial commission is 1% and ongoing commissions are 1% p.a. Securitor may receive initial commission of \$100 and may pass up to \$100 of that to us. Assuming the investment amount stays the same, each year Securitor may receive ongoing commission of \$100 and may pass up to \$100 to us.

Life Insurance Products

Depending on the product you purchase, Securitor may receive between 0% and 140% of the annual premium as initial commission, and between 0% and 38.5% p.a. of the annual premium for ongoing (trail) commission. Securitor may pass up to 100% of these commissions to us.

In addition, Westpac Group may receive benefits as part of the Securitor Risk Partner Program in the form of education, training and other support and resources to assist in the delivery of life insurance advice. Participants in the Risk Partner Program may pay a fee to Securitor. Participants may be given the opportunity to promote the benefits of their life insurance products. The total amount of fees, or the fees that may be paid by each individual life insurance product provider, will depend upon the commercial arrangements that may be negotiated from time to time between Securitor and each product provider. These payments will not change the amount of the premium payable by you.

Example

We recommend an insurance product to you. The annual premium is \$450 p.a. Securitor may receive up to \$630 as an initial payment and may pass \$630 to us. Assuming the premium stays the same, each year Securitor may receive up to \$173 p.a. as an ongoing (trail) commission and may pass up to \$173 to us.

Securitor may enter into arrangements with life insurance providers relating to the sale of certain life insurance products that provide for payment(s) to Securitor in the form of a licensee commission based on the volume of sales. No amounts received by Securitor relating to these arrangements are passed through to us. Currently, Securitor may receive remuneration of up to 17% p.a. of the premiums written annually with applicable life insurance providers.

Example

If you purchase a relevant life insurance product and the annual premium is \$450, Securitor may receive up to \$76.50 p.a. from that life insurance provider.

Margin Lending Products

If we organise, or increase a margin loan for you, Securitor may receive payments in the form of ongoing commissions from the margin loan provider. Commissions on margin lending products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have entered into a margin lending product arrangement prior to 1 July 2014, commissions may be payable where Securitor had an existing arrangement with the margin loan provider prior to 1 July 2013. These commissions range between 0% and 0.5% p.a. of your loan balance. Securitor may pass up to 100% of these commissions to us.

Example

We recommend you borrow \$10,000 through a margin loan. The applicable ongoing commission is 0.5% p.a. Assuming the loan balance stays the same, each year Securitor will receive ongoing commission of \$50 and may pass up to \$50 to us.

OTHER BENEFITS

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer, or that relate to educational and training purposes.

A copy of the register is available on request for a small charge.

WILL ANY OTHER PARTIES BENEFIT FROM THE FINANCIAL SERVICES OFFERED IN THIS FSG?

Westpac may benefit from remuneration paid in respect of the financial services offered in this FSG.

Product providers in the Westpac Group receive product fees and may be entitled to certain expense reimbursements if you invest in their products. Product fees are generally calculated as a percentage of the amount or value of your investment in these products.

Sometimes Westpac Group companies do not charge specific fees for their products or services. This may be the case where, for instance, Westpac buys, sells or issues derivatives, foreign exchange products and certain other financial products from or to a customer. In these circumstances, instead of a fee, Westpac incorporates margins (being the difference between what you pay for a financial product and what it costs Westpac to issue it to you) into the buy, sell or issue price or rate.

Westpac Group companies may also benefit from other roles they perform in a transaction. When these products or services are provided to you, details of these fees or benefits and how they are calculated will be disclosed in the relevant PDS or other disclosure document that will be provided to you by us.

Preferred partners – Asgard platform

Westpac or a related company (excluding Asgard Capital Management Ltd) receives benefits in the form of fees from fund managers that it selected as preferred partners, where

those arrangements were put in place prior to 1 July 2013. To be selected as a preferred partner, these fund managers must have met certain quality hurdles (such as investment fund performance). Preferred partners may be given the opportunity to promote the benefit of their managed funds to Westpac Group representatives and other advisers who use the Asgard platform, including Securitor advisers.

Westpac or a related company (excluding Asgard Capital Management Ltd) receives up to 100% of the management fee received by preferred partners in respect of funds under administration in their products through the Asgard platform. This fee is negotiated individually with preferred partners and may vary from time to time.

The total amount of fees received will depend on all relevant circumstances, including funds that flow into, and which remain, under administration. We do not receive any part of this payment.

Example

If you were to invest \$50,000 into a preferred partner's product via the Asgard platform and the management fee charged by the preferred partner is 1% p.a., the preferred partner may pay up to \$500 p.a. to Westpac or a related company (excluding Asgard).

If you choose to receive financial planning services, you acknowledge that we will be able to advise you on preferred partners' products. If you invest in a preferred partner's product as a consequence of such advice, fees, as outlined above, are payable.

We are under no obligation to recommend preferred partners' products. Please note that fund managers in general may pay rebates to Asgard and in such cases 100% is passed on to you directly by Asgard.

WHAT ARRANGEMENTS MAY INFLUENCE OUR ADVICE TO YOU?

Securitor's Approved Product List includes some Westpac and Asgard financial products, as well as a range of financial products from product providers not associated with the Westpac Group. Securitor does not require its Authorised Representatives to recommend only Westpac Group products.

We are generally only permitted to recommend Wrap services provided by platform providers within the Westpac Group, however we can recommend other Wrap services to you where it suits your objectives, financial situation and needs.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

WHAT FEES DO WE PAY TO SOMEONE WHO REFERS YOU TO US?

If you are referred to us we may pay the referrer a fee. We may also provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.

The fee varies according to the referrer and financial products involved.

The fee may be a percentage of our fees, a percentage of the total amount invested paid through the referral, or a flat fee. We may pay these fees upfront when the financial service is provided, or the financial product is provided, or periodically as ongoing fees.

SECTION 2

PRIVACY STATEMENT

WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

COLLECTING AND DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to other members of the Westpac Group, anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Securitor is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

OTHER IMPORTANT INFORMATION

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available at securitor.com.au. It covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

DEFINITIONS

'We', 'our', 'us' means Securitor Financial Group Ltd and its Authorised Representatives.

'Westpac Group' means Westpac Banking Corporation and its related bodies corporate.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

SECTION 3

ARE YOU SATISFIED?

WHAT TO DO IF YOU HAVE ANY CONCERNS ABOUT OUR SERVICES

Both we and Securitor endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1.) Contact us first about your concern.
- 2.) If your concern is not resolved to your satisfaction, you may contact Securitor by:


 **National Manager
Advice Complaints
Securitor Financial Group Ltd
GPO Box 5265
Sydney NSW 2001**

 **wealthmanagementcomplaints@securitor.com.au**

- 3.) If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Financial Ombudsman Service (FOS).

FOS independently and impartially resolves disputes between consumers, including some small businesses and participating financial services providers.

FOS provides an independent dispute resolution process covering complaints about financial services including: banking, credit, loans, general insurance, life insurance, financial planning, investments, stockbroking, managed funds and pooled superannuation trusts. You may contact FOS by:


 **GPO Box 3
Melbourne VIC 3001**

 **info@fos.org.au**

 **fos.org.au**

 **1800 367 287**

- 4.) The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring Australia's financial markets are fair and transparent, and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

 **Australian Securities & Investments Commission
GPO Box 9827
Your Capital City
Or
PO Box 4000
Gippsland Mail Centre
Victoria 3841**

 **asic.gov.au**

 **1300 300 630**

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.

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