

Financial Services Guide

Version 1.9

Effective from 22 November 2021

Financial Services Guide

This Financial Services Guide (FSG) is issued with the authority of TWD Licensee Services Pty Ltd ABN 88 605 064 480 Australian Financial Services Licence No.475964 (TWD Licensee Services). It is designed to clarify who we are and what we do, and help you decide whether to use our services.

This FSG must be read in conjunction with an Adviser Profile as it forms part of this FSG. The Adviser Profile provides detailed information about your financial adviser, such as their contact details, education and professional qualifications, and the types of financial products they can advise and deal in. This guide is only complete when you also have an Adviser Profile.

- This FSG contains information about us and:
- Fees and charges and how you can pay for our services;
- The advice and services your financial adviser can provide;
- Details on how you may instruct your adviser;
- Who will be responsible for providing the financial services;
- Documents you may receive;
- How TWD Licensee Services Pty Ltd and your financial adviser is paid for the financial planning services provided to you;
- Any associations or relationships that could create a potential conflict of interest;
- Details of who to contact should you not be satisfied with our advice and services;
- Compensation arrangements we have in place; and
- Our Privacy Policy

About Us

We hold an Australian Financial Services Licence No.475964 (AFSL) issued by the Australian Securities and Investment Commission (ASIC). TWD Licensee Services Pty Ltd is responsible for the advice and conduct of your financial adviser as set out in this FSG. TWD Licensee Services Pty Ltd provides your adviser with research, training, compliance, technical and operational support.

Other documents you may receive

In addition to this FSG, when we provide you financial advice, we will also present you with a written **Statement of Advice** (SOA).

This will describe the strategies, products and services we recommend, advantages, risks and disadvantages of the advice, disclose any fees and/or commissions we will receive and any associations we have with financial product providers (or other parties) that may influence our advice.

If you receive further financial advice from us, we will present you with either another Statement of Advice or keep our own written **Record of Advice** (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided.

We will also provide you with a **Product Disclosure Statement** (PDS) or offer document for all financial products we recommend, where applicable, to help you make informed decisions.

If you enter into an ongoing fee arrangement that exceeds 12 months, then you will receive a **Fee Disclosure Statement** from us annually setting out the fees you have paid to us, the services that we contracted to provide and what we did provide to you over that period. Additionally, every year we will send you a **Renewal Notice** requesting your consent for us to continue to provide services to you.

Not Independent

We may receive commission on life insurance products as set out in this FSG under the heading 'How you are charged for advice'. For this reason, we are not permitted to refer to ourselves as 'independent', 'impartial' or 'unbiased'.

Financial Services & Products

TWD Licensee Services Pty Ltd is licensed to advise on and deal in the following classes of financial products to both retail and wholesale clients:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

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What Advice Is Available to You?

We can provide you with advice and services in relation to the following areas:

- Wealth Accumulation
- Life and disability insurance
- Income Protection
- Trauma Insurance
- Business Insurance
- Super vs non-super
- Budgeting & Cash flow management
- Income Streams
- Aged Care
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Dollar cost averaging
- Non-super investing
- Borrowing to invest
- Margin Lending
- Portfolio construction
- Estate Planning
- Structuring Advice – Trusts, Companies & Small Business
- Self-Managed Superannuation
- Government Benefits
- Debt Management
- Charitable Giving & Philanthropy

We maintain an Approved Product List (APL). Subject to attaining required accreditation, your financial adviser can recommend any product on the APL. There may be instances where your financial adviser will need to consider products outside of the APL. In these cases, your adviser may apply to obtain licensee approval.

What we need from you

It is important that you provide us with accurate and complete information about your personal and financial circumstances, goals and objectives so that we can provide advice that is in your best interests.

We also need you to inform your financial adviser if there are any changes that may influence your future objectives and/or may have an impact on your financial plan.

You have the right not to provide us with the above information. However, if you do not, the advice you receive may not be appropriate to your objectives, financial situation and needs.

You should carefully consider any verbal warnings and read the information and warnings contained in advice documents before making any decision relating to a financial product or advice.

As a financial services provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports and driver's licence. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

What information do you maintain in my file and can I examine my file?

We maintain a record of your personal profile including details of your objectives, financial situation and goals. We also maintain records of any recommendations made to you. If at any time you wish to examine your personal information, you can contact your financial adviser.

We are committed to keeping your personal information secure. Please refer to the 'Our Privacy Policy' section in this FSG

Giving us your instructions?

You can give us instructions or information verbally or in writing, for example by mail, telephone or email. In some situations, we will require your instructions to be in writing.

In an attempt to expedite the financial planning process, we may ask our clients to sign documents electronically in certain circumstances. We will firstly ask for your consent however if you change your mind at any time, please contact our office. Please Note: It is very important that you keep us informed of any change in your e-mail address. Please contact us as soon as possible regarding such changes.

How are we paid for the services we provide you?

Your financial adviser can be paid by fees for superannuation and investment products, or commissions for retail insurance products, or a combination of both. Your financial adviser will discuss & agree both the rate & method of payment with you before any financial services are provided.

Where you receive personal advice, your SOA or ROA will detail all remuneration & other benefits associated with the advice.

All fees & commissions disclosed in the SOA or ROA are payable to TWD Licensee Services. Your financial adviser's practice pays TWD Licensee Services a monthly service fee. In return, TWD Licensee Services pays 100% of all fees & commissions it receives to your financial adviser's practice.

All fees and commissions received by TWD Licensee Services are subject to GST.

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How you are charged for advice

Initial Meeting

Our initial meeting is free of charge. After the first meeting, your financial adviser will discuss the fees and charges that will be applicable to your individual circumstances.

Advice & Service Fees

We only charge a fee where we believe we can add significant value to our client's affairs. The fee is always quoted in advance and is based on the time and complexity of all the work that we are assigned to undertake as part of our relationship.

First year fees for the cost of research, strategy development, advice preparation and implementation generally range from

\$3,300 to \$22,000 depending on complexity.

The fees for providing our ongoing professional services to you will also depend on complexity but generally range between

\$2,750 and \$33,000.

Insurance Commissions

Some product providers pay commissions to TWD Licensee Services. The amount of commissions received will depend upon the type of product and the amount invested or premium paid.

If we receive commissions as a result of recommending a product to you, we may reduce our fee for service.

In the event that we reduce our fee for service in this manner and you decide not to proceed with our recommendations, or if your insurance policies are cancelled within the first 2 years of acceptance (in which case the insurer claims back all or some of the commission paid to us), we may invoice you directly for the cost of our service.

Initial commission payable under an upfront structure will be capped at 66 per cent. Ongoing commission under an upfront structure will be capped at 22 per cent of the net annual premium paid. Both initial and ongoing commission under a level structure is capped at 33 per cent.

Increases to Policies issued before 1 January 2018

There may be an initial commission payable of up to 130 per cent of the first year's annual premium and then ongoing commission of up to 33 per cent of the annual premium paid.

Rebating

Your adviser may rebate all commissions in respect of the services or products you acquire or hold.

What other benefits can we receive?

TWD Licensee Services Pty Ltd and/or its advisers may receive non-monetary benefits from product providers and other similar parties where:

- The amount is less than \$300 and identical or similar benefits are not given on a frequent basis;
- The benefit has a genuine education or training purpose (including attendance to conferences) and is relevant to providing financial product advice; and/ or
- The benefit consists of the provision of information technology software or support and is related to the provision of financial product advice in relation to the financial products issued or sold by the benefit provider.

Any benefit that is material to our advice to you will be disclosed in your SOA or ROA. Payments or benefits received are disclosed in a register. A copy of the register is available upon request.

Do any relationships exist which might influence the service or advice I receive?

TWD Licensee Services Pty Ltd is not owned by any Fund Manager, Insurance Issuer or financial institution.

TWD Asset Management Pty Ltd (TWD Invest) is a Corporate Authorised Representative of TWD Licensee Services. Your adviser may pay TWD Invest fees for providing portfolio management and administration services.

TWD Licensee Services has an arrangement with CommSec. CommSec transaction costs are approximately 0.15% or a minimum of \$29.95 on each transaction. This includes a CommSec brokerage fee of 0.09% or a minimum of \$19.95; and a TWD Invest execution fee of 0.06% or a minimum of \$10.00.

TWD Licensee Services has an arrangement with Desktop Broker/Bell Direct. Desktop Broker/Bell Direct share transaction costs are approximately 0.15% of the value of the trade or

a minimum of \$28.00 on each transaction. This includes a Desktop Broker/Bell Direct brokerage fee of 0.077% (or a

minimum of \$18.00) and a TWD Invest execution fee of 0.073% (or a minimum of \$10.05).

TWD Licensee Services has an arrangement with Netwealth Investments Limited. A fee for brokerage services equal to 0.125% of trade value (with a minimum of \$18.50 per trade) is charged to your account when you instruct us to purchase or sell ASX listed securities through our nominated broker, and a TWD Invest execution fee of \$11.00. Minimum trade costs are

\$28.50 which includes the TWD invest fee.

Privacy Notification

How we manage your personal information

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification covers us and tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy go to www.twd.com.au/privacy-policy/

Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information. This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, (including other advisers, paraplanners and organisations who work with us), depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee;
- your representatives, service providers, or other organisations, such as your accountant, mortgage broker, solicitor, tax agent,

stockbroker or bank;

- organisations involved in a business restructure or a transfer of all or part of the assets of our business;
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities); and
- where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers and/or support staff). You can view a list of the countries in which those overseas organisations are located in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Consent to marketing activity

We presume you consent to being contacted by us and our related companies about products and services that may be of interest to you. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the 'Contact us' section of this FSG). We will process your request as soon as practicable.

Gaining access to your personal information

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

Correcting your Information

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

What Should You Do If You Have A Complaint?

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

If you are unhappy with the advice you receive, or other aspects of our service please contact your financial adviser & tell them about your complaint. If your complaint is not satisfactorily resolved within 3 working days, please contact our Complaints Manager so we can act on it immediately.

You can let us know about your complaint by telephone, email or letter using the contact details below.

Complaints Manager

Phone: 1300 893 000

Email: complaints@twd.com.au

Postal address: PO Box 539, West Perth WA 6872

If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA), an independent complaints-handling body. We are a member of the AFCA. AFCA provides a free, accessible, fair and independent dispute resolution service to consumers.

You may lodge a complaint with the Australian Financial Complaints Authority:

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

Mail: Australian Financial Complaints Authority GPO Box 3
Melbourne VIC 3001

Compensation Arrangements

TWD Licensee Services Pty Ltd holds professional indemnity insurance that satisfies the requirements of the Corporations Act. This insurance also covers the conduct of advisers who were authorised by TWD Licensee Services Pty Ltd at the time of providing the advice but are no longer representatives at the time of your complaint.

Contact Details

TWD Licensee Services Pty Ltd

Address: Level 3/682 Murray Street, West Perth WA 6005

Website: www.twd.com.au

Email: info@twd.com.au

Phone: 08 6363 5300

Fax: 08 6313 4290



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Stottsure Financial Advice Pty Ltd and its advisers are Authorised Representatives of TWD Licensee Services Pty Ltd ABN 88 605 064 480 AFSL 475964.