



FRESHWATER

Financial Planning

AND ADVISORY SERVICES PTY LTD

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FINANCIAL SERVICES GUIDE

Version 1.2



FINANCIAL PLANNING
ASSOCIATION *of* AUSTRALIA



About this Financial Services Guide

This Financial Services Guide ("FSG") is an important document that explains the financial planning services we offer and provides you with important information which is designed to help you consider whether to use our financial services.

It explains who we are, and what you can expect from us. It also explains how we deal with a complaint if you are unhappy with our services.

Other Documents you may receive

You may also receive other important documents if you choose to engage in any of our products or services.

If we provide you with personal advice, it will normally be documented in a **Statement of Advice** ("SoA"). This document sets out our advice, the basis of that advice, and details about the fees, costs and other benefits payable as a result of the advice given.

As part of our ongoing review and service, if we provide further advice, the appropriate document will be provided to ensure all appropriate disclosures are communicated to you as our client. We will keep a copy of the further advice that we provide. You can request a copy of the advice at any time using our contact details in this FSG.

If we recommend a financial product or arrange a financial product for you, we will make available a **Product Disclosure Statement** ("PDS"), which provides you with important information about the product, such as its features, benefits, fees and risks. This will assist you to make a decision about whether or not to buy that product.

About Freshwater Financial Planning & Advisory Services Pty Ltd (we, us, our)

Freshwater Financial Planning & Advisory Services Pty Ltd ("Freshwater Financial Planning") is licensed through Axies Pty Ltd (a subsidiary of Spark Financial Group). Axies Pty Ltd ("Axies") is a holder of an Australian Financial Services Licence (AFSL 339384). This FSL has been given to you by your Financial Adviser with the authority of Axies. We hold professional indemnity insurance cover for the activities conducted under our AFSL which satisfies the requirements of s912B or the Corporations Act 2011 (Cth) for compensation arrangements. The insurance will cover claims in relation to the conduct of all current authorised representatives and for those who are no longer authorised under Axies (but were at the time of the relevant conduct).

Axies, through its Financial Advisors, acts for you when providing financial services to you. All Financial Advisors operating under Freshwater Financial Planning & Advisory Services Pty Ltd in the provision of financial services to retail clients (you) are engaged as Authorised Representatives.

Our Services

We can help you with the following:

- Budgeting and cash flow management
- Investing in managed funds
- Personal insurance (life cover, disability, income protection, trauma & Key Man)
- Superannuation strategies, including Self-Managed Superannuation Funds (SMSFs)
- Strategic asset allocation
- Retirement planning (retirement income streams, including pensions & annuities)
- Estate planning
- Centrelink and other government benefits
- Age Care planning
- Ongoing advice and services, including regular portfolio reviews

Any additional advice or services we can offer you, or limitations to the list of advice services, will be outlined by our financial advisors.

You can choose to receive advice addressing some or all of these aspects as well as the timing of our advice all at once or over time, as required to meet your needs as they arise. We will work with you to identify the level of advice and services appropriate for you to meet your financial goals.

Using Our Services

We will work with you to agree what advice and services we will provide and when we will provide them.

Where you agree to ongoing advice and services, the details will be documented and provided to you. This includes the frequency of contact between us, service standards that may apply, any ongoing fee arrangements and how the service can be terminated.

If at any time you wish to terminate your relationship with us, please contact us stating your name, address and phone number and provide instructions on what you require as well as why you have decided to terminate the agreement.

Personal Financial Advice

For Freshwater Financial Planning & Advisory Services Pty Ltd to give you appropriate personal financial advice, you will need to provide details of your personal objectives, current financial situation, needs and any other relevant information.

You do not have to provide us with this information. If you choose not to provide this information however, we may not be able to provide you with advice, or the advice you receive may be general in nature and may not be appropriate to your objectives, financial situation and needs. You should read the warnings provided in any document that we provide to you carefully in regard to any decision relating to a financial product.

We only provide personal advice to you where you use the services of one of our representatives. We will not give you personal advice in our regular updates or marketing material, or when you visit our website. We maintain a record of your completed personal profile including details of your objectives, financial situation, needs and other personal information. For more information on how to access these records, please see the Privacy section.

Limits of the Advice

It is important to understand that the advice your Financial Adviser provides may be limited because:

- You have provided incomplete personal information
- You have sought specific advice e.g. only in respect of superannuation
- Your Financial Adviser has a limited authorisation
- Your Financial Adviser is restricted to advising on products on our approved product list
- Your Financial Adviser is restricted to dealing and advising on products permitted under our licence.

In formulating recommendations, your Financial Adviser may consider legal and estate planning implications. As we are not specialists in these areas, you should seek further advice, as relevant, from an appropriate specialist.

Based on the information collected from you, we will consider the tax consequences that relate directly to the financial advice being provided. However, although Freshwater Financial Planning & Advisory Services Pty Ltd is registered with the tax practitioner board as a tax (financial) Adviser it is not a Registered Tax Agent and consequently this advice does not include an assessment of your overall tax position. As such, we strongly recommend you review this advice with a Registered Tax Agent for the purpose of completing tax returns and for detailed tax advice on your overall financial position.

How you can give us Instructions about your Financial Services

You can contact us directly with any instructions relating to your financial services. This includes giving us instructions by telephone, mail or email. We can only accept your instructions via email once you have signed an authority form.

Financial Planning Fees, Commissions, Remuneration and Interests

Initial Advice Fees

These are paid when you have agreed to receive our advice.

Our charges range from \$1,650 for simple superannuation advice up to \$11,000 for strategic financial planning advice. Our charge for a no advice service will be subject to a minimum fee of \$275 per hour. All fees are inclusive of GST.

These prices should be used as a guide only. We will discuss your individual needs and agree our costs with you. The final cost will be based on the complexity and extent of services we agree to provide you. These fees will also be provided within your SoA.

Ongoing Advice Services

We offer ongoing advice services as part of our client value proposition. Our ongoing advice service fees are indexed to CPI and listed below inclusive of GST.

The range consists of;

- **Bronze:** Get yourself financially fit and set on a path to reaching your next financial goal. Our basic ongoing service to maintain your file and offer administrative support which includes our annual review service.
- **Silver:** For those looking to grow and maintain their financial plan, this includes all services available under the 'Bronze' package with added services under our semi-annual financial review service.
- **Gold:** Suited to more complex financial planning & SMSF clients. This is our full service package which provides a comprehensive suite of services tailored to your needs. This service also consists of a quarterly financial review service.

Please note: A detailed itemised list of services provided are available at request to your Financial Adviser. At your review, if there are any further advice requirements that need to be documented, your financial adviser will provide a quote for you to approve prior to proceeding.

Your tailored ongoing service package will be discussed and agreed with you based on your individual needs and goals. The cost of these services will be provided and explained to you in detail by your Financial Adviser and detailed in your initial SoA.

Payment Methods

Where you have asked to be invoiced directly for our advice and services we will provide you with an invoice at the time of presenting our advice. Payment is required within 7 days of receiving our invoice and can be paid by:

- Credit Card
- Electronic funds transfer (EFT)
- Where you have chosen to pay our initial advice fees via your product, these fees will be deducted from your product upon implementation of our advice.

Risk Insurance Commissions

Risk insurance product providers will pay Freshwater Financial Planning & Advisory Services Pty Ltd upfront and on-going commissions if you proceed with a risk insurance product one of our Advisors recommends to you. The upfront commission payable to Freshwater Financial Planning & Advisory Services Pty Ltd for advising on and implementing risk insurance financial products for you can range as per below.

Commission caps

The ASIC Instrument provides for a transition period in respect to the limits on commission (inclusive of GST), so that commission is capped at 66% of the premium for the first year of the policy, from 1 January 2020.

The ASIC Instrument also caps commission (inclusive of GST) for subsequent years following the first year of the policy at 22% (there is no transition period in respect to this cap). Further, if the benefit is given because of a client initiated increase, then specific formulae apply.

For example, on an insurance premium of \$1,000 (year 2020) that is paying 66% initial commission and up to 22% on-going commission, the upfront commission may be \$660 once-off and the on-going commission would be \$220 per annum.

There will be a 100% clawback of commission where the life insurance policy is cancelled, not continued or the policy cost is reduced in the first year and 60% clawback of commission in the second year.

How our Staff are remunerated

Our staff are remunerated by salary that includes superannuation benefits. The amount of salary varies according to the staff member's position within Freshwater Financial Planning & Advisory Services Pty Ltd. Our staff may also be eligible for bonus and incentive payments that is based on a number of factors, including performance, meeting customer service standards, and proper administration. In addition, staff may also be eligible for prizes such as gift vouchers ranging from \$1-\$50 as reward for exceptional all-round performance across a month, or \$1-\$500 as reward for exceptional all-round performance across a year. You may request further details of these prizes by contacting us.

Dealer Group Benefits

As a Corporate Authorised representative of Axies Pty Ltd, licence fee remuneration that incorporates Professional Indemnity Insurance, compliance and administration services is payable to Spark Financial Group, who owns Axies Pty Ltd.

Licensee Benefits, Interests and Associations

Freshwater Financial Planning & Advisory Services Pty Ltd does not receive any of the payments directly from the product providers. Where there are other fees, charges, commissions or benefits not listed above that Freshwater Financial Planning & Advisory Services Pty Ltd or its Financial Advisors may receive for recommending and arranging financial planning products and services to you, we will provide this information to you when we make specific recommendations in the Statement of Advice.

Shareholdings

I, and/or an associated entity have no shares in any product provider that may influence my advice.

Remuneration paid to and from Referral Partners

From the 1st of January 2020, Freshwater Financial Planning & Advisory Services Pty Ltd and its advisers are not able to receive any referral payments from any service providers we may refer you to.

Credit Contracts Acting as an Intermediary

We do not receive commission either directly or indirectly from any credit contract or lease.

Conflict of Interest

Importantly, whilst Freshwater Financial Planning & Advisory Services Pty Ltd will work with you to discuss your preferred investment strategy and risk appetite, Freshwater Financial Planning & Advisory Services Pty Ltd operates as a business under a license owned by Axies Pty Ltd (a subsidiary of Spark Financial Group).

I, Carl Freshwater, as the Sole Director and Shareholder of Freshwater Financial Planning & Advisory Services Pty Ltd, have a financial interest in Freshwater Financial Planning & Advisory Services Pty Ltd.

In the course of providing you with advice, you may be recommended strategies that lead to purchases of products and services from parties related to our Licensee, Axies Pty Ltd and companies that I may have a shareholding in.

Despite this being a potential conflict of interest, it is Freshwater Financial Planning's obligation to ensure that we act in your Best Interests at all times. Acting in your Best Interests must be documented appropriately in your Statement of Advice, where if this is demonstrated we will be entitled to additional remuneration which will assist in subsidising the cost of your Advice. Where you purchase from these parties, we may receive additional remuneration benefits.

Disputes or Complaints

We are committed to providing our customers with the best possible service. If at any time you feel we have not met our obligations – or you have a complaint about any of our services – please inform us so we can work towards a resolution. We will endeavour to deal with your complaint promptly, thoroughly and fairly.

How to Make a Complaint and the Complaints Process

If you need assistance in describing or making a complaint, or if you just want to discuss your concerns informally before deciding whether to make a complaint, please feel free to contact us.

If you have a complaint, we would like to be the first to know if you are not happy with our services. We request you follow these steps:

1. Please contact our AFSL Responsible Manager in writing, using the following method:
By email: robindrozario@sparkfg.com.au
2. Please provide full contact details so we may respond to you quickly
3. Give us as much detail as possible about the nature of your complaint and provide any documentation that supports your complaint.

We will:

- Confirm receipt of your complaint within 48 hours;
- Endeavour to resolve your complaint within 30 days;
- If the complaint is complex we will inform you of the delays and the likely resolution date.

Complaints about Third Party Products or Services

If your complaint relates to a product or service acquired through a third party (for example, a lender) we may ask you to contact the relevant third party. They will deal with your complaint under their complaints resolution process.

If you are not satisfied with the resolution of your complaint by the third party under their complaints resolution process, you are entitled to have your dispute considered by their External Dispute Resolution Scheme. Please contact the third party for further details.

Keeping you Informed about Your Complaint

We will keep you informed at regular intervals about the progress of our investigations and response(s).

Still Not Satisfied?

If after 45 days we cannot reach a satisfactory resolution of your complaint, you may take the matter – free of charge – to the relevant External Disputes Resolution (EDR) Scheme (provided it is within the scheme's terms of reference) as detailed below. You may also refer the matter to the relevant EDR Scheme at any time, but if our internal process is still in progress, they may request that our internal processes be complete before considering the matter further.

Our financial service licensee's external dispute resolution service provider is the Australian Financial Complaints Authority (AFCA) who has replaced the three existing EDR schemes of the Financial Ombudsman Service (FOS), the Credit and Investments Ombudsman (CIO) and Superannuation Complaints Tribunal (SCT) so that consumers have access to a single EDR scheme. You could contact AFCA via:

- Telephone: 1800 931 678
- Mail: GPO Box 3, Melbourne, Vic. 3001

Privacy

To develop a successful financial strategy, including recommending suitable products which will meet your needs, we need to consider your personal circumstances and financial goals. We will ask you for information about your financial situation and needs prior to our initial meeting, or during our meeting to ensure our advice is appropriate for your circumstances. You have the right not to divulge this information to us, if you do not wish to do so. In such a case, we may warn you about the possible consequences of us not having your full personal information, which may include us not being able to assist with advice that is relevant to your circumstances.

We keep a record of your personal information and advice documents for a period of no less than 7 years. On your request, we can provide you with a copy of this information. Charges may apply to cover external costs incurred as a result of accessing and providing you with this information plus a 10% administration fee.

In order to provide our services to you, your personal information may be transferred or disclosed overseas as some services providers connected to the administration of your accounts and other services we provide are located outside of Australia. Where information is transferred or disclosed overseas, we will ensure that our contractual arrangements contain provisions requiring that the recipient has appropriate data handling and security systems in place to prevent misuse, loss or unauthorised disclosure in accordance with Australian Privacy laws and standards.

It is also important that you keep us up to date by informing us of any changes in your circumstances, so we are able to determine if our advice continues to be appropriate. You may contact us to update your personal information.

We are committed to implementing a Privacy Policy which will ensure the privacy and security of your personal information. Any personal information collected from you will be handled in accordance with our Privacy Policy. Our Privacy Policy details how we comply with the requirements of the Privacy Act in the handling of our personal information. A copy of our Privacy policy can be found in our website. If you require further information, please let us know.

Please note that the information you have provided will be shared amongst certain third parties other than myself such as;

- Axies Pty Ltd a subsidiary of Spark Financial Group (Licensee),
- Financial product providers,
- Service providers engaged to provide financial planning related services including but not limited to paraplanning, compliance, administration, estate planning and financial services software (IRESS/COMPASS & WorkSorted). This includes service providers located outside of Australia, including Philippines, Vietnam, Malaysia, India and potentially other countries in South East Asia. For a current list of providers engaged by Licensee – Axies Pty Ltd, please check the Spark Approved Panel of Providers.
- Companies involved in communicating the information in the FSG to any of the above parties, may use services such as electronic mail services, cloud storage services such as Google Drive, OneDrive and/or document creation services.

The information above will be shared as outlined unless otherwise directed by you.

Appendix 1 – Our Financial Advisers

Carl Freshwater CFP®, B.Bus, Adv Dip FS (Financial Planning)

Managing Director – Freshwater Financial Planning & Advisory Services Pty Ltd

Which is a Corporate Authorised Representative (no.) of Axies Pty Ltd (a subsidiary of Spark Financial Group) an AFS Licensee

Carl commenced working in the Financial Planning industry in 2008, after spending time working within investment banking and retail banking services. Carl has a great passion for the Financial Planning industry and has dedicated himself to becoming a highly qualified professional adviser for the benefit of his clients. Carl is known as a high-performance professional with the utmost level of personal and commercial integrity.

Carl founded Freshwater Financial Planning & Advisory Services Pty Ltd in 2019. He holds a Bachelor of Business (Business Information Systems) from RMIT, an Advanced Diploma in Financial Services (Financial Planning) and is a CERTIFIED FINANCIAL PLANNER® with the Financial Planning Association.

Carl has completed specialist courses in Self-Managed Superannuation Funds with Kaplan Professional and is an Accredited Age Care Professional™ with Age Care Steps.



FINANCIAL SERVICES GUIDE

CLIENT ACKNOWLEDGEMENT

Please sign and date this form to acknowledge that you have received and read the Financial Services Guide. Once signed please return this form to your Adviser.

FSG Version Received 1.2

Please tick this box, if you give consent to accept all above terms via electronic/digital signature.

Signed.....

Date.....

Signed.....

Date.....