Financial Services Guide

Version 10
Date: 13 October 2016

The documents you will receive from us

Financial Services Guide

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you
- how we and our associates are paid and any other benefits we may receive
- any potential conflicts of interest we may have
- how we protect your privacy and handle your personal information
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

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 and outline any fees or commissions we will receive and any associations we have with financial product providers or other parties that have not already been disclosed in this FSG.

If you receive further financial advice from us, we will present you with either another SOA 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. Please refer to the "Contact us" section of this FSG for our contact details.

We will also provide you with a Product Disclosure Statement (PDS) or offer document for all financial products we recommend, where applicable. This will outline the product in detail to help you make an informed decision about whether it is right for you.

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the "Contact us" section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.

About our Licensee

We are authorised representatives of GWM Adviser Services Limited ABN 96 002 071 749, Australian Financial Services Licence Number 230692 ("GWM Adviser Services") of Level 1, 105-153 Miller Street, North Sydney NSW 2060.

GWM Adviser Services is recognised as one of Australia's leading financial advice networks, with over 450 experienced financial planners across Australia managing over $14 billion of investments.

GWM Adviser Services is a professional partner of the Financial Planning Association, the professional body representing qualified financial planners in Australia, and therefore adheres to set standards in terms of ethics, conduct and continuing professional development.

Our associations and relationships

GWM Adviser Services is part of the National Australia Bank Limited ("NAB") group of companies ("NAB Group"). GWM Adviser Services is a wholly owned subsidiary within the NAB Group. NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by GWM Adviser Services or its authorised representatives.

We may recommend financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited). These include products and services with the following branding:

- NAB, National
- MLC
- Fairview Equity Partners
- JANA Investment Advisers
- Antares Capital
- Pengana Capital
- Altrinsic Global Advisers
- Plum or Plum Super
- JB Were Wealth Management
- Redpoint Investment Management
- Threesixty Research
- Northward Capital
- Presima Inc

If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on GWM Adviser Services' approved product list. In some categories these may be all NAB Group products. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances, then we may

recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests.

GWM Adviser Services maintains a relationship with the following insurance providers (AIA, Zurich, Colonial First State, One Path and Macquarie) which pay GWM Adviser Services a licensee commission payment as described in the 'Commissions received by our Licensee from product providers' section of this FSG.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

MLC Limited will pay National Wealth Management Services Limited, a related body corporate of NAB, a distribution allowance as described in the 'Distribution Allowance' section of this FSG. If appropriate to your requirements, objectives and circumstances then a GWM Adviser Services adviser may recommend a risk insurance policy issued by one of these insurers, or an insurance policy issued by MLC Limited.

About us

Who we are

LEADERSHIP
Trilogy Financial Group financial advisers are open and honest. They guide you by presenting facts and thoughtful, well-considered opinions enabling you to take control of your financial future.

DIRECTION
The comprehensive experience, financial knowledge and lateral thinking of the Trilogy Financial Group team helps deliver a wealth management plan that best suits you. Trilogy financial advisers and support staff come from a diverse range of financial backgrounds and bring a wealth of industry and technical knowledge to your advice.

CLARITY
Trilogy Financial Group advisers keep you informed every step of the way in a simple, no nonsense manner – they do not use confusing jargon.

CERTAINTY
Whilst life can change, the Trilogy adviser will always be there to help you with financial and lifestyle decisions. Trilogy earns trust and respect by making your life better.

The Financial Services we offer are provided by Trilogy FG Pty Ltd, ABN 68 153 240 272 Authorised Representative No. 437095

The following financial advisers are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of GWM Adviser Services:

Hayden Allen: CFP® B.Ec F Fin
Authorised Representative No. 373207

Robert Chiswell: CFP®
Authorised Representative No. 242711

Colin Ash: ADFP
Authorised Representative No. 446387

Mel Lever: CFP® B.Bus (FP)
Authorised Representative No. 457244

Anthony Gauci: B.Com (BL)
Authorised Representative No. 1242844

GWM Adviser Services Limited has authorised us to provide you with this Financial Services Guide.

What we do

We are authorised by GWM Adviser Services to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide financial advice and deal in the following financial products:

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

Trilogy FG Pty Ltd is not authorised by GWM Adviser Services Limited to provide financial product advice in the following financial products:

- General Insurance Products
- Other i.e. Lending Products

We are not authorised to provide any other financial services or financial products on behalf of GWM Adviser Services.

Where we are unauthorised to provide you with a financial service or financial product that you are interested in, we will advise you of this and refer you to an alternative source of advice.

Contact us

For more information on anything you have read in this FSG, to obtain a copy of our privacy policy or if there is anything else we can help you with, please contact us at:

Address:
234 Deakin Ave, Mildura VIC 3500
2 Para Street, Renmark SA 5341

Phone:
Mildura: 03 5021 1235
Renmark: 0407 020 350

Fax:
Mildura: 03 5021 2638

Email:
info@trilogyfg.com.au

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, please ask us.

If you would like more information about our Licensee GWM Adviser Services (and other members of the NAB Group), please also refer to the National Australia Bank Privacy Policy available at www.nab.com.au/privacy).

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, including GWM Adviser Services and other members of the NAB Group, 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 GWM Adviser Services and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, 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; and
- 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)
- 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). 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.

Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid;
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products);

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

Consent to marketing activity

We presume you consent to being contacted by us (including GWM Adviser Services and other members of the NAB Group) about suitable products and services via the contact details you have provided. 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.

Complaints
If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal these complaints, by reading our Privacy Policy (by contacting us) or by referring to the 'Your confidence in our advice' section of this FSG.

Further information
If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at **www.oaic.gov.au**

Your confidence in our advice

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

Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.

2. If your adviser has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

   Phone: 1800 611 950
   Email: advice_complaints@mlc.com.au
   In writing to:
   Advice Dispute Resolution Team
   GWM Adviser Services
   Level 2, 105-153 Miller Street
   North Sydney NSW 2059

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Financial Ombudsman Service (FOS), an independent complaints handling body. We are a member of FOS. FOS provides a free, accessible, fair and independent dispute resolution service to consumers. You can contact FOS on:

   Phone: 1800 367 287,
   Email: info@fos.org.au
   Website: fos.org.au
   In writing to:
   The Manager
   Financial Ombudsman Service
   GPO Box 3
   Melbourne VIC 3001

GWM Adviser Services holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by GWM Adviser Services at the time of providing the advice, but are no longer authorised representatives of GWM Adviser Services at the time of your complaint.

How you can pay for our services

You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a financial product provider when you commence an insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time.

Other payments we may receive

We will provide you with details of all fees, commissions or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Payment on MLC Insurance Products

We may become eligible to receive a payment if we participate in MLC Ltd's Insurance Adviser Rewards Program. This payment is paid directly by MLC Limited and importantly does not alter the amount of premium payable by clients.

The Program is operated by MLC Ltd for the year 1/10/2016 to 30/9/2017 **(Qualification Period)** and applies to MLC Ltd products, being MLC Personal Protection Portfolio, MLC Life Cover Super, MLC Protectionfirst, MLC Insurance and MLC Insurance (Super) **(MLC Products)**.

Determining the MLC Adviser Rewards Payment:
At the completion of a Rewards Year, we may be eligible to receive a fixed dollar payment of $50,000.

Qualification Process
The reward payment for ARP will be based on the following business metrics:

- retaining more than 87% of MLC Insurance Products over the qualification period;
- total premium in force over $500,000;
- new business sales more than $75,000;and
- more than a 65% usage rate for Riskfirst.

If all of the criteria outlined above are not met, we will not be eligible to receive a MLC Adviser Reward Payment.

Conferences

We may attend conferences and professional development seminars that have a genuine education or training purpose. GWM Adviser Services Limited, or our employer, may pay for the costs of our travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

We keep a register detailing certain non-monetary benefits that we receive e.g. benefits valued between $100 and $300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting us. Please be aware that GWM Adviser Services Limited may charge you for the cost of providing this information to you.

Commissions received by our Licensee from product providers

GWM Adviser Services has ongoing commission arrangements with a number of risk insurance providers. Where you acquire a risk insurance policy issued by AIA, Zurich, Colonial First State One Path and Macquarie the insurer may pay GWM Adviser Services a commission payment which based on total in-force premium and lapse rates for risk insurance policies recommended by all advisers within GWM Adviser Services adviser network. The payments received by GWM Adviser Services may be up to 2% of the premium amounts paid by policy holders to the relevant insurer. As this amount is calculated in the future, we cannot provide an exact amount at this time; however, as an example, if as a result of services provided to you by GWM Adviser Services, a participating insurance provider receives $5,000 in premium, then GWM Adviser Services will receive up to $100 as a commission (2% of the premiums held).

The above payments are not shared with your adviser. These payments do not represent an additional charge to you and your adviser will disclose in your Statement of Advice insurance products for which these arrangements may apply.

Distribution Allowance

MLC Limited pays a distribution allowance to National Wealth Management Services Limited, a related body corporate of NAB, in respect of the distribution of MLC Limited's insurance products by licensees in the NAB Group (including NAB). This amount is not ascertainable at this time and will depend in part on the value of MLC Limited's insurance portfolio relating to insurance distributed through NAB and its related bodies corporate and the performance of NAB and its related bodies corporate against agreed annual performance criteria.

This allowance is not shared with your adviser and does not represent an additional charge to you.

Referrals

If you have been referred to us or we refer you to someone else, we may have arrangements in place to or receive a referral fee, commission, or other benefit.

Details of any arrangement will be provided in our advice to you.

Business Equity Valuation (BEV)

In the event of our death or permanent disablement, or if we were to leave the financial planning industry, GWM Adviser Services Limited provides a buyer of last resort option called BEV. This helps manage the transition of ownership to ensure you continue to receive advice.

Our business operates in a corporate structure. This model is less likely to be eligible for BEV as all the Principal Advisers in our business would have to either leave the industry, die, or become permanently disabled.

The value of a sale under BEV is based on a multiple of ongoing revenue received by the business on an annual basis. The multiple can range from 2.5 to 4 depending on the proportion of the ongoing revenue that comes from clients who hold MLC group financial products.

Here are some examples to help you understand the potential benefit to us of our clients holding MLC group product:

- If the ongoing revenue of the business was $100,000 and 50% of our clients held MLC group products, the sale value for the financial planning business would be between $250,000 and $350,000;
- If the ongoing revenue of the business was $100,000 and 85% of our clients held MLC group products, the sale value for the financial planning business would be up to $400,000;

Importantly, BEV is subject to us meeting certain compliance requirements and standards.

How we charge for our services

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Initial consultation	Your first appointment will determine if we can help you. This meeting is at our expense and you will not be charged.
Advice preparation	As no situation is the same, we will disclose a fee range based on the complexity of the advice. This fee will be discussed with you and disclosed in your Statement of Advice prepared by us prior to you giving your approval to proceed.
Implementation (fee for advice)	As no situation is the same, we will disclose a fee range based on the complexity of the advice. Borrowed funds – if we recommend you acquire investments using borrowed funds then your ongoing fee will be a minimum of $1,000 pa and a maximum of $10,000 pa.
Ongoing fee for advice	If you elect to pay a fee for the ongoing review of your financial planning strategy, the ongoing fee is based on the complexity of ongoing advice and the services provided. The maximum fee is 1.5% of the value of your portfolio each year. For example, for investment valued at $200,000 the maximum ongoing fee would be $3,000 pa. Borrowed funds – if we recommend you acquire investments using borrowed funds then your ongoing fee will be a minimum of $330 and a maximum of $10,000 pa.
Ad hoc advice	Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of up to $330 (including GST) may apply.
Execution only service	Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off maximum of $330 fee may apply.
Stamping Fees	Where we receive stamping fees from issuer companies for raising capital or debt on behalf of that company, we will offset this payment against the cost of our advice to you.
Insurance products	The relevant insurer will pay initial commission between 0% and 130% and ongoing commission between 0% and 33% of the annual premium for as long as you hold the product. Commissions are paid to us by the product provider and are not an additional cost to you.
Pre-existing arrangements	For existing clients already in an established commission arrangement, we may receive commission on investment products or margin lending products held. For investment products the relevant product issuer will pay initial commission between 0% and 5.5% and ongoing commission between 0% and 0.88% of the value of your investments for as long as you hold the product. For margin loans the relevant product issuer will pay an ongoing commission between 0% and 0.88% of the outstanding loan balance. Commissions are paid to us by the product provider and are not an additional cost to you.