



# Financial Services Guide

**Version 14**

**Date: 29<sup>th</sup> May 2019**

# Important Information about our Licensee

## **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, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA).

This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (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.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

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 approximately 400 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”).

As the NAB Group is an issuer of financial products, we are not able to refer to ourselves or our advice as ‘independent’, ‘impartial’ or ‘unbiased’. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC’s Money Smart website ([www.moneysmart.gov.au/investing/financial-advice](http://www.moneysmart.gov.au/investing/financial-advice)).

GWM Adviser Services Financial Planners are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

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
- JANA
- JB Were
- Plum
- Pre Select Funds
- Private Investment Consulting
- WealthHub Securities
- Altrinsic Global Advisers
- Antares Capital
- Fairview Equity Partners
- Intermede Investment Partners
- Presima Inc
- Redpoint Investment Management

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. These will include 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. You can view a copy of our approved product list on the MLC Financial Planning website ([mlcfp.mlc.com.au](http://mlcfp.mlc.com.au)).

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.

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 an insurance policy issued by MLC Limited.

# About us

## Who we are

At **CommonCents Financial Planning** we want to improve the wellbeing of all Australians by making a lasting positive difference to family life. We deliver common sense financial advice that allows you to stop worrying about money and start living a richer life.

Our common-sense method has been developed and proven over 20 years of real world application and is based on our philosophy called **Know > Change > Do**.

It starts with finding out what you do “**know**”, what you don’t “**know**”, and then teaching you the fundamentals that you need to “**know**”.

Once you know the fundamentals we will work closely with you to identify what you specifically need to “**change**”. Any meaningful improvement in any area of your wellbeing is going to require “**change**”.

After change comes “**do**”. It is not enough to simply gain some new knowledge and identify some things that need to change - you need to take action - you have to consistently “**do**” it.

This holistic approach delves deeply into your views and relationship with money and makes your financial health and happiness our sole focus.

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:

### **Nick Girle**

Authorised Representative No. **395917**

### **Richard Brannelly**

Authorised Representative No. **454295**

The Financial Services that the above advisers offer are provided by:

**CommonCents Financial Planning Pty Ltd, ABN 16 167 774 361**

trading as

**CommonCents Financial Planning** Authorised Representative **No. 457028**

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

Nick Girle & Richard Brannelly are not authorised by GWM Adviser Services Limited to provide financial product advice in the following financial products:

- General Insurance 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:

115 Herries Street  
PO Box 3576  
Toowoomba QLD 4350  
Ph 1300 376 781  
Fax 1300 376 791  
admin@commoncentsfp.com.au  
www.commoncentsfp.com.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@nab.com.au](mailto:advice.complaints@nab.com.au)

**In writing to:**

Advice Dispute Resolution Team  
GWM Adviser Services  
Level 2, 105-153 Miller Street  
North Sydney NSW 2060

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Telephone:** 1800 931 678 (free call)

**In writing to:** Australian Financial Complaints Authority  
GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers. Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

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.

# Payments and benefits we receive

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.

### **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.

## **Sponsorship**

GWM Adviser Services Limited receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and CommonCents Financial Planning do not directly share in the sponsorship payment; however, CommonCents Financial Planning may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

CommonCents Financial Planning believe that GWM Adviser Services Limited should not receive these sort of payments as it is actually a poorly managed conflict of interest. The preference of CommonCents Financial Planning is that the onus is on GWM Adviser Services Limited to provide education and training on a user pays basis therefore all training received by CommonCents Financial Planning is paid for by CommonCents Financial Planning and not by an unrelated third party.

## **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, CommInsure and One Path the insurer may pay GWM Adviser Services a commission payment which is based on total in-force premium and lapse rates for risk insurance policies as at 31 December 2017, 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 for policies as at 31 December 2017, then GWM Adviser Services will receive up to \$100 as a commission (2% of the premiums held).

The above payments are not shared with or paid to CommonCents Financial Planning. GWM Adviser Services Limited negotiated these payments without the knowledge or consent of CommonCents Financial Planning and continue to refuse to terminate the arrangement. These payments do not represent an additional charge to you and CommonCents Financial Planning 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 nor paid to CommonCents Financial Planning and does not represent an additional charge to you.

## **Referrals**

### **Referrals from a third party**

We have arrangements in place to pay a referral fee, commission, or other benefit to certain third parties when they refer new clients to us. Our current arrangements for referrals from a third party are set out in the table below and specific details of any benefit we provide in relation to our advice to you will be included in the advice documentation we provide to you.

**Table - Details of arrangements for referrals from a third party:**

Name of referral partner	Payment we provide for the referral	Example
Moore Lewis & Partners	20% of the initial revenue received	20% of initial fee of \$3,300 = \$660 incl GST

### **Referrals to a third party**

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further 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.

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<b>Initial (Discovery) consultation</b>	This consultation is at our expense
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<b>Advice preparation &amp; Implementation</b>	<p>If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice:</p> <p>The minimum fee charged is \$4,400 while the maximum fee is \$10,000. For example complex advice that contain multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation Funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum.</p>
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<b>Ongoing fee for advice</b>	<p>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 minimum fee is \$3,960 while the maximum is \$14,900 each year.</p> <p>The ongoing advice fee will be based on the level of service needed and the complexity of the advice. Complex advice requirements include the use of trusts and ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged.</p>
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<b>Ad hoc advice</b>	We do not provide ad-hoc advice for those not part of our ongoing advice programmes
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<b>Insurance products</b>	<p>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.</p> <p>Commissions are paid to us by the product provider and are not an additional cost to you.</p>
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<b>Pre-existing arrangements</b>	<p>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.</p>
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# 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](http://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](http://www.oaic.gov.au)