Purpose and content

This Financial Services Guide (FSG) provides important information to help you decide if you want to use our financial services. It includes details of:

- the financial services and products we offer
- our fees
- adviser(s) who may be appointed to assist you with financial services
- how we and our associates are paid, and any interests, associations or relationships that could affect our advice
- our internal and external dispute resolution procedures and how to access them
- our privacy policy.

What other documents might I receive from Shadforth?

If you decide to obtain personal advice from us we will provide our initial advice and any significant subsequent advice to you in a written report called a Statement of Advice (SoA). Your SoA will set out our advice, the basis on which it is given, our fees and/or commissions, as well as information about any associations or relationships that could affect it.

It is important to note that we can only provide personal financial advice after making enquiries, and after giving consideration to your current financial situation and future requirements.

If you receive additional ongoing financial advice from us and a SoA is not provided to you, we will record details of that advice in a Record of Advice document. You can request a copy of any relevant Record of Advice documents within seven years of receiving the advice from us.

You should also note that if we recommend a particular financial product to you, we will generally provide a Product Disclosure Statement containing information about the particular product in order to help you make an informed decision.
About us

This FSG, has been produced by Shadforth Financial Group Limited (Shadforth, ‘we’, ‘us’, and ‘our’). Shadforth:

- will act on your behalf and has authorised the distribution of this FSG
- holds Australian Financial Services Licence No.318613.

You can contact us by:

Telephone: 1300 308 440
Facsimile: 1300 657 879
Web: sfg.com.au
Mail: Shadforth Financial Group Limited,
Level 6, 161 Collins Street
Melbourne, VIC, 3000

Shadforth is a wholly owned subsidiary of IOOF Holdings Limited (IOOF) ABN 49 100 103 722 and its related bodies corporate (IOOF group).

Improve your life today, with a plan for a more confident tomorrow

Our experienced and dedicated private client advisers offer highly personalised financial advice, developing tailored financial solutions and services for each client’s circumstances and objectives.

As a Shadforth client, you’ll be provided with all the information and resources you need to feel empowered and in control of your finances, leaving you to enjoy the things that are really important in life.

We regularly meet with our clients to stay up to date with their personal circumstances and affairs, and also to adjust our recommendations so they can take advantage of emerging opportunities created by the ever-changing environments of taxation, superannuation, investment markets and government regulations.

We challenge ourselves to be the best in everything we do, and we embrace the opportunity to question conventional wisdom and champion better outcomes for our clients.
Our products and services

We offer you the flexibility and convenience of accessing high-quality financial advice and services to help you generate and maintain wealth over time.

Services offered or arranged by us include:

- goals based advice
- wealth creation planning and protection, including long-term cashflow modelling where applicable
- retirement planning and superannuation advice
- self-managed super funds advice and administration
- insurance – personal and general
- philanthropic advice and management
- Centrelink and aged care planning
- estate planning advice
- investment advice and portfolio management, including stockbroking services
- lending solutions
- corporate superannuation advice
- retrenchment and redundancy advice
- regular review of your strategies, objectives, investments, loans and insurance.

We can advise and deal in relation to the following financial products:

- managed investments including Investor Directed Portfolio Services (IDPS)
- superannuation and retirement savings accounts
- Managed Discretionary Account (MDA) services
- listed securities including equities, hybrids and listed investment companies
- deposit products
- derivatives
- government debentures, stocks or bonds
- investment life insurance and life risk products
- standard margin lending facilities.

In some cases, advisers and other persons authorised to provide services on our behalf are only authorised to provide a certain range of services. In these circumstances, it is important to review any restrictions to the authority issued to the representative (a copy of which is available on request).
Our advice

Who will be my adviser?
Your adviser will be a representative of Shadforth.

Who is responsible for the financial services provided?
Shadforth is responsible for the financial services we and our representatives provide to you. If you are an existing or new client of Shadforth, any financial services provided to you are provided by Shadforth acting in its own capacity.

Do you have any relationships that might influence the advice?
Relationships that might influence our advice include:

a Our relationships with other professionals
We may pay a fee to other professionals for referring you to us.

b Our relationships with related companies

Where we recommend a product or service, in some circumstances a related company may receive a fee for that product or service. Circumstances where this might occur include where we:

- recommend a product or service be provided by a related company
- recommend a MDA or IDPS operated by a related company
- arrange for you to participate in an Initial Public Offer (IPO) underwritten by a related company.

Related companies in the IOOF group include:

Australian Executor Trustees Limited ABN 84 007 869 794 AFSL 240023,
IOOF Limited ABN 21 087 649 625 AFSL 230522,
IOOF Investment Management Limited ABN 53 006 695 021 AFSL 230524,
Perennial Investment Management Limited ABN 13 108 747 637 AFSL 275101,
Managed Portfolio Services Limited ABN 77 009 549 697 AFSL 233761,
Financial Acuity Limited – ABN 50 095 662 632 AFSL 233760, and
Australian Ethical Investment Limited - ABN 47 003 188 930 AFSL 229949

Related companies, their employees, representatives, directors and associates may also hold interests in products we recommend.
Members of the IOOF group have agreements with a number of financial product issuers and service providers.

Details of the fees and relationships of these other companies can be found in the relevant disclosure document for the product or service recommended which will be provided to you as appropriate.

How will you prepare and provide me with suitable advice?

We examine your financial position and create a structured plan designed to achieve your financial goals in life over defined timeframes. We do this by helping you to identify and prioritise your goals, developing realistic strategies and helping you to assess the merits of each alternative, making any changes you require to the strategies. A regular review will ensure that your strategy remains consistent with your goals and objectives as they change over time.

Your adviser is under an obligation to act in your best interests in relation to any personal advice provided to you (known as the ‘best interests duty’).

Are there any limitations to your advice?

We generally only advise and deal in products and services that are listed on our Approved Products and Services List. This list, which is regularly reviewed and updated, is the result of research of a wide range of financial products and administration arrangements, of leading financial product issuers. From this process we select the best and most appropriate for the majority of our clients. However, where an Approved Product does not meet your needs, your adviser can recommend a product outside the Approved Product List after appropriate due diligence and a one-off approval from our Research team. For more information on our Approved Products and Services, please contact your adviser.

As there may be other products and services that could also be suitable, you should observe any warnings and consider any significant risks contained in our advice prior to implementing any of our recommendations — as any investment decision carries with it a degree of risk — either the risk of capital loss or the risk of the expected benefits not being obtained.

From 1 July 2014, new regulations require your adviser to declare whether they are a registered tax (financial) adviser or not, hence whether or not they are authorised to provide tax (financial) advice. We recommend that you seek independent legal and tax advice about our recommendations and confirm any entitlement to government benefits with the relevant department.
How do we protect your personal information?

We recognise the importance of protecting your privacy. Your personal information will be handled in accordance with our privacy policy, which outlines how the information we collect from you is used, stored and disclosed.

We will collect your personal information from the questionnaire you complete with your financial adviser. As a financial service provider, we are obligated to verify your identity and the source of any funds. Accordingly, we will ask you to present identification documents, such as your passport and driver’s licence, which will be held on file.

What is my personal information used for?

The main reason we collect, use and/or disclose your personal information, is to provide you with the products and services that you request. This may also include the following related purposes:

- to help your financial adviser provide you with financial advice and ongoing services in relation to your financial products
- to facilitate internal administration, accounting, research, risk management, compliance and evaluation of IOOF group products and services
- to establish and maintain insurance protection that you may request
- to provide you with information about other products and services that we or other members of the IOOF group offer that may interest you.

We may also disclose your information to external parties some of whom act on your or our behalf. These parties may include:

- your financial adviser
- banks or other financial institutions
- insurers and reinsurers and their claims agents and assessors
- product providers
- mail houses
- other companies within the IOOF group.

We are also permitted to collect and disclose your personal information when required or authorised to do so by law.

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter-Terrorism Finance Act 2006 (Cth) to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as your passport or driver’s licence. We will also retain copies of this information.

If you do not provide the personal information requested, we may not be able to provide you with the financial services you require.
Accessing and correcting your personal information

If you have concerns about the accuracy and completeness of the information we hold, you may request access to your personal information by contacting the Privacy Officer at the address listed in the contact details of this FSG.

Depending upon the nature of the request, we may charge you the reasonable costs of providing you any information you have requested.

You can get a copy of our Privacy Policy from your adviser, from our website (www.sfg.com.au) or by asking us.

Other

How can I give you instructions?

You can give us instructions by telephone, fax, email or other means as agreed with us. Some financial products have their own rules about how to give instructions. Please refer to the Product Disclosure Statement of the relevant product for those details.

Are there any special rules that apply to transactions in shares listed on the ASX?

Rules designed to ensure a fair and orderly market may mean that in the event of an error or omission, the ASX Market Participant with whom your instruction is placed may be required to amend or cancel a trade or crossing without your consent – at the instruction of ASX. We will notify you if we are aware that this has occurred or may occur.

Our remuneration

As your adviser is an employee of Shadforth, his or her remuneration will include a salary and may include a bonus based upon performance and achievement of various objectives. The variable/bonus component of the employee’s remuneration is generally determined annually, based on a number of factors including growth in funds and client retention, the standard of service provided to clients, the training undertaken by the adviser and revenue received by us for the prior year.

Your adviser’s remuneration may also include a share of dividends from IOOF Holdings Limited (where he or she holds shares in that company). If any other remuneration is payable (and not disclosed here), we will provide information about how that amount is calculated when we give you our advice.
How will I pay for the services provided?

Before we provide any services we will agree with you how we get paid. We offer a variety of service levels and fee structures that can be tailored to suit your individual circumstances. Fees may comprise one, or a combination, of the following:

- **Fee for advice** – your adviser may charge fees for the preparation and implementation of our advice. These fees will be based on your individual circumstances, the complexity of your situation and the time it takes to prepare personal financial advice for you.

- **Ongoing advice fee** – your adviser may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be either a set amount, or based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio.

We will discuss these fees with you prior to giving you the advice.

If we recommend that a product or service be provided by a related company, that company will benefit by receiving the fees they charge for the product or service as shown in the disclosure document or agreement.

We will provide details to you about our fees and any payments made to us by product issuers when we provide our advice to you. We will also explain the fees associated with a particular product or service we recommend. You have the right to request further information about the remuneration we receive, so if there is anything that is unclear or if you require more information about the service levels we offer, please contact your adviser.
Typical examples of fees (inclusive of GST)

<table>
<thead>
<tr>
<th>Description</th>
<th>Fee Details</th>
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<tbody>
<tr>
<td>Preparation of an Initial Statement of Advice</td>
<td>From $2,200. Your adviser may charge fees for the preparation and implementation of our advice. These fees will be based on your individual circumstances, the complexity of your situation and the time it takes to prepare personal financial advice for you.</td>
</tr>
<tr>
<td>Annual fee-for-service</td>
<td>From $3,300. You may be charged an annual fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be either a set amount based on the time involved and complexity in reviewing your portfolio, or a percentage fee based on the amount of funds under our advice.</td>
</tr>
<tr>
<td>Fees for share and derivatives transactions</td>
<td>Brokerage fees generally vary between a minimum of $33 or 0.11% and a maximum of 2.75% – subject to a minimum brokerage fee that might be set from time to time. The cost of brokerage for share transactions through platforms are set out in the relevant disclosure documents and will typically be less than this. We will tell you what brokerage fees will be incurred for share transactions, and any commission payment that is payable to us as a result of our advice (being a portion of the brokerage).</td>
</tr>
<tr>
<td>Commission for Life Risk Insurance Products</td>
<td>We may receive an initial commission of up to 77% from the life insurance company for risk insurance products that you purchase and we may also receive an ongoing commission up to 32% when you renew your policy. This commission is taken out of the premium that you pay and is not a separate charge to you. Applicable risk insurance commissions will be detailed in your SOA.</td>
</tr>
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What other benefits does Shadforth receive?

If Shadforth, or an adviser, receives a minor non-monetary benefit of between $100 and $300 or a contribution toward the cost of professional development, the benefit will be noted in a register. Should you wish to see this register, please contact us.

Will anyone be paid for referring me to you?

In some situations, clients are referred to us by someone else. If this occurs, and we pay a fee or commission in relation to that referral, we will tell you who will receive that fee or commission, and the possible amount.

If you have a complaint

We are committed to providing our clients with the highest standards of client service. This involves being completely transparent in the way in
which we charge for our services, and being proactive and forthcoming with important information which we believe may assist you with decision-making during our relationship with you.

Should you feel less than completely satisfied with the service you receive, it is important to notify us immediately to have the issue raised and resolved. You should take the following steps:

1. Contact us and tell us about your complaint.

2. If your complaint is not satisfactorily resolved within 5 days, please put your complaint in writing and send it to:

   Complaints Officer
   Shadforth Financial Group Limited
   Locked Bag 4004
   Queen Victoria Building NSW 1230
   Telephone: 1300 308 440

   We shall endeavour to resolve your complaint quickly and fairly. If the complaint is not resolved to your satisfaction or within 45 days, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

   Website: www.afca.org.au
   Email: info@afca.org.au
   Telephone: 1800 931 678 (free call)
   In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

   If the complaint involves ethical conduct of an FPA member, you also have the option of raising your concern in writing with the Financial Planning Association of Australia Limited (FPA). The FPA can be contacted at: GPO Box 4285 Sydney NSW 2001. Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on 1300 300 630 or via the website www.asic.gov.au.

   We have compensation arrangements in place, including Professional Indemnity insurance cover that is adequate for the type of financial services we provide and also for any potential liability arising from compensation claims. These arrangements comply with section 912B of the Corporations Act.