FINANCIAL SERVICES GUIDE

This Financial Services Guide was prepared and issued with the authority of **Bluewater Financial Advisors**
Australian Financial Services License No. 411846

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Bluewater Financial Advisors (BFA) holds an Australian Financial Services Licence (AFSL) Number 411846 and authorises Financial Advisers under its AFSL. Our contact details are listed above. BFA is responsible for any advice you receive.

The purpose of this Financial Services Guide (FSG) is to help you make an informed decision about the services we offer and whether they are suited to your needs. This FSG also provides you with important information on how to engage with your Adviser.

This FSG is an important document which we are required to provide to you as a condition of our Australian Financial Services Licence (AFSL).

It contains information about:

- Information about BFA as an AFSL holder
- The documents you may receive
- Other forms of remuneration or benefits that exist
- Information about privacy (i.e. collection, use and handling)
- Our complaints procedure
- Our compensation arrangements
- Details of your Adviser and responsibilities for providing financial services
- What your Adviser is authorised to do
- Details on how you can instruct your Adviser
- All forms of remuneration received by your Adviser

When you are provided with advice, your adviser is required to comply with the Best Interests Duty and will always act in your best interest.

Not Independent

Under the Corporations Act, we are prevented from using the terms independent, impartial and unbiased as we receive commissions for the advice that we provide on life insurance products.

ABOUT BLUEWATER

Bluewater Financial Advisors Pty Ltd is a privately owned and operated Australian company that is not owned or associated with any Bank, Insurer or Funds Management business. Bluewater is a Principal Member of the Association of Independently Owned Financial Professionals (AIOFP).

Bluewater Financial Advisors conducts business through a network of financial Advisers who are appointed as Authorised Representatives under Bluewater Financial Advisors' AFSL.

Where Bluewater Financial Advisors has appointed a corporate entity as an Authorised Representative, representatives of that company who give advice will also be authorised by Bluewater Financial Advisors

APPROVED PRODUCT LIST

Your Adviser can provide advice on a wide range of financial products, however they are required to recommend those approved by BFA which can be found on the BFA Approved Product List (APL). Your Adviser will assess whether the products on the APL (investment, superannuation and insurance) are suitable for you. The APL is compiled by BFA and seeks to remove conflicts from the advice process (where possible). You will be provided with a Product Disclosure Statement (PDS) or other disclosure documents (as available from the issuer), if we recommend a financial product.

OUR OBLIGATIONS TO YOU

Our initial obligation at the start of the relationship is to fully inform you of your rights, entitlements and detail the services we provide. This FSG is intended to inform you of certain matters relating to your relationship with us prior to you being provided with any Authorised Financial Service. This FSG covers who we are, as Authorised Representatives of Bluewater Financial Advisors Pty Ltd, how we are remunerated and the method by which we engage our professional advice process. It is intended that this document should assist you in determining whether to use any of the services described. It is our duty to provide you with this document at the first available opportunity.

WHAT SERVICES DO WE PROVIDE?

As an Authorised Representative of Bluewater Financial Advisors your Adviser is licensed to provide a comprehensive range of services which include:

- Deposit & Payment products
- Government debentures, stocks or bonds
- Life investment and life risk products
- Cash Flow Management & Budgeting
- Wealth Accumulation and Investing
- Retirement Planning
- Ongoing advice & regular reviews
- Superannuation & SMSF
- Managed investment schemes included investor directed portfolio services
- Group Insurance
- Direct Equity Advice
- Personal insurance advice
- Margin Lending

BEFORE RECEIVING ADVICE

Will the adviser provide you with advice suitable to your needs and financial circumstances?

Yes. To provide quality advice, you need to supply us with your individual goals and objectives, your financial situation and your needs. You have the right not to divulge this information; if you do not wish to do so then we are required to warn you about the potential consequences of us not having your full personal information prior to providing advice. You should read the warnings carefully and ask our Authorised Representative about these consequences if you are unsure.

What should you know about the risks of the financial products or strategies we recommend to you?

Your adviser will explain to you any significant risks related to the financial products and strategies recommended to you.

What information do we maintain in your file, and can you examine your file?

Your Advisor will maintain a record of your personal profile, which includes details of your goals and objectives, financial situation, needs, copies of recommendations made to you and any products acquired by you. Internal member databases are maintained, and portfolios are reviewed on a regular basis subject to your membership agreement. If you wish to examine your file, we ask that you make this request via email to your Adviser and allow up to fourteen (14) working days for the information to be forwarded. You may be charged a fee to cover the cost of preparing any material requested. If the information sought is extensive, you will be advised of the likely cost in advance and can help to refine your request if required.

PROVISION OF ADVICE

Personal advice
Before we can give you advice, which is appropriate and in your best interests, you will need to give us details of your personal objectives, current financial situation, needs and any other relevant information. You can choose not to provide us with this information, but any advice we give you will be general in nature and may not be appropriate to your objectives, financial situation and needs. If you are a retail client, you should read the warnings contained in the SoA carefully before making any decisions relating to a financial product.

If we give you personal advice, we will maintain a record of your personal profile, including details of your objectives, financial situation and needs. We will also maintain records of any recommendation made to you. For information on how to access personal information about you, please refer to the section 'Your Privacy' below. We will only give personal advice to you if you secure the services of one of our representatives.

Other documents you may receive:

Statement of Advice (SoA)
Unless you're a Professional Investor, Sophisticated or Wholesale Client any financial advice we provide to you will be confirmed in writing in either a Statement of Advice (SoA) or a Record of Advice (RoA).
In these cases, unless we warn you otherwise, our advice will consider your personal circumstances, needs and goals. You should read the SoA or RoA carefully, to ensure that you fully understand any recommendations we make. Do not implement our advice unless you do.

When will you receive a Compliance Documents / Statement of Advice (SoA)?

The information will be recorded in a Client Information Questionnaire by your Adviser, and you will be asked to sign that document, so you are sure it accurately reflects what was discussed.

Initially, your advice will be documented in a SoA, which will detail and consider your current financial situation and requirements.

The SoA provided will outline:

- What the advice covers (the scope).
- Details of why you are seeking advice (i.e. your goals and any specific requirements).
- Your personal circumstances (financial, health and anything else relevant to the advice).
- The advice itself and any recommendation being made (strategic and/or financial products) plus the advantages, disadvantages and any risks involved.
- Any payments to us (fees, commissions or other benefits) and how that is determined.
- Any associations we have that may influence the advice provided to you.

If you receive advice in the future, your Adviser will provide you with a subsequent SoA or a Record of Advice (RoA) (depending on the complexity of the advice). We are required by law to keep copies of any RoA or SoA for a minimum of seven years.

When your adviser makes a recommendation to acquire a financial product, you must also be provided with a **Product Disclosure Statement** from the issuing product provider, which gives full details of the recommended product to assist in making an informed decision to acquire that product. You should receive and review the PDS (or other offer document) provided by us before you make an investment decision about our products, or a produce we recommend.

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

Can you tell us how you wish to instruct us to buy or sell your financial products?

Yes. You may specify how you would like to give us instructions, for example by telephone, email, or other means or specify how the instructions are to be given.

How will you pay for the services provided?

Your adviser may charge you a fee for providing Advice and/or Financial Services. The amount and how you choose to pay may vary based on whether it is a fixed fee, commission, or combination of both. 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.

Ongoing fee for advice:

Your Adviser will provide you with a Fee Disclosure Statement (FDS) each year if you have an ongoing fee arrangement with us. It will outline the fees you paid, and the services received and the services you were entitled to receive in the preceding 12 months. You should let your Adviser know within 60 days of receiving the FDS if you want to continue that arrangement. If you elect to end the arrangement, we have an obligation to stop all ongoing fees and commission.

Insurance products:

66% of the premium in the first year of the policy with a maximum trailing commission of 22%.

If the policy lapses in the first year 100% commission is clawed back, and 60% clawed back in the second year. Your adviser will charge you a fee equivalent to the value of the clawback in the event your policy lapses and they are not paid for their services. Any fees, charges or commissions are payable to BFA and will be disclosed in the advice documents provided to you.

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. If we cannot provide this accurately, we will provide worked-dollar examples.

Referral Fees and Commissions

We do not accept referral fees or commissions from external parties. We disclose the referral arrangements to you whenever we refer you to an external party.

STATEMENT OF BLUEWATER PRIVACY POLICY

Bluewater is committed to ensuring the confidentiality and security of the information provided by you to us. We support and embrace the National Privacy Principles set out in the Privacy Amendment (Private Sector) Act 2000 and the protection afforded by this act for the security of private information held on ordinary Australians.

You may be requested to provide us with information about your personal circumstances and anything else relevant to enable us to provide appropriate advice to you. AUSTRAC requirements mean that your Adviser will need to confirm your identity by sighting and verifying documents such as your Passport and Driver License.

We will also collect information from you to meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act. We will generally collect this information directly from you however, in some cases we will seek your authority to collect if from other parties such as your accountant or your superannuation fund. If you do not provide us with all the information that we request, we may not be able to provide our services to you.

All personal information we gather from you, as well as any advice provided to you is maintained in a file. We only keep your Tax File Number and sensitive personal information if we have your written permission. If you would like to examine your personal information, please let your Adviser know.

We will hold and use your personal information so that we can continue to provide our services to you. We will only disclose your personal information to external parties where: The law requires us to do so, you consent for us to do so, consider whether there are other parties where there may not be consent. If you have any complaints about how we handle your private information, please contact Bluewater Financial Advisors by phone on 1300 966 330 or email Robert@bluewaterfinancial.com.au We take your privacy seriously and will address your concerns through our complaints handling process. A full copy of our Privacy Policy is available on our website www.smartmoneygroup.com.au

If you believe you do not receive a satisfactory resolution to your concern, you may contact the Office of the Federal Privacy Commission. The web site of the office of the Federal Privacy Commissioner is www.privacy.gov.au

COMPLAINTS

Who can you contact if you have a complaint about the provision of financial services to you?

We endeavor to provide you with the best advice and services – always. If you are not satisfied with our services, we encourage you to contact us at our office or put in writing via email to compaints@bluewaterfinancial.com.au and tell us about your complaint.

How we handle complaints

We are committed to providing you with quality advice. If you are unhappy with our services, we would like you to tell us about it and let us know how you think we can fix it.

If you have a complaint about the service provided to you, you should:

- Contact your adviser
- Contact Bluewater Financial Advisors at the office on 1300 799 101

Alternatively, if you prefer to submit a written complaint, please do so to:

The Complaints Officer
GPO Box 4523
Sydney NSW 2000
E: compliance@bluewaterfinancial.com.au

Your complaint will be assessed, and you will be advised of the outcome, either by telephone or in writing.
If any issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides an independent financial services complaint resolution that is free to consumers.

You may lodge a complaint with AFCA if:
Your complaint relates to a Bluewater service; and You are not satisfied with our response after 30 days.

Bluewater is a member of AFCA, you can contact AFCA via the following, quoting membership number 28547.

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

Complying with Compensation Arrangements

Bluewater Financial Advisors has Professional Indemnity Insurance in line with legislative requirements. This includes coverage for claims in relation to the conduct of current and former Advisers (no longer authorised by Bluewater Financial Advisors). If you would like more information, please contact us.