



A fresh approach.

Financial Services Guide

spring' FG WEALTH PTY LTD

ABN 23 146 936 763 | AFSL 391655

15 March 2018

A fresh approach.



Issue Date and Issuer

This Financial Services Guide (FSG) is dated 15 March 2018 and is issued by Spring FG Wealth Pty Ltd (ABN 23 146 936 763). Spring FG Wealth Pty Ltd is a wholly-owned subsidiary of Spring FG Limited (ABN 87 169 037 058). Spring FG Limited is an ASX-listed (ASX: SFL) diversified financial services company with several other wholly-owned subsidiaries collectively operating under the registered business name of Spring Financial Group.

Purpose and contents of this FSG

This FSG is designed to provide you with important information regarding our services (and assist you in deciding whether to use our services) prior to us providing you with a financial service, including the following:

- Who we are and how you can contact us
- What services we are authorised to provide and how we are remunerated for these services
- Any (potential) conflicts of interest we may have
- Our internal and external dispute resolution process.

If you would like further information, please ask us.

Name of Service Provider & Principal Contact

The Service Provider is Spring FG Wealth Pty Ltd (Spring FG), and the Principal Contacts are Jack Standing (Responsible Manager and National Head of Advice Team) and Cara Edwards (Group Head of Compliance & Education) who can be contacted via our Sydney office.

Australian Financial Services Licence (AFSL)

Details and financial services provided

Spring FG Wealth Pty Ltd holds an Australian Financial Services License (AFSL 391655) and is authorised to provide the following services to retail and wholesale clients:

Financial product advice for the following classes of financial products:

- Basic and non-basic deposit products
- Derivatives
- Debentures, stocks and or bonds issued or proposed to be issued by a government.
- Life products including investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds; and life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds
- Interests in managed investment schemes including investor directed portfolio services.
- Retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997)
- Securities
- Standard margin lending facilities
- Superannuation

We are also authorised to deal in a financial product by:

Applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of:

- Basic and non-basic deposit products
- Derivatives
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Life products including investment life insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds; and life risk insurance products as well as any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds
- Interests in managed investment schemes including investor directed portfolio services.
- Retirement savings accounts ('RSA') products (within the meaning of the Retirement Savings Account Act 1997)
- Securities
- Standard margin lending facilities
- Superannuation

Services we provide and the nature of our advice

We offer comprehensive financial advice services and a wide range of financial products.

When we provide you with personal advice that takes into account your financial situation, objectives and needs you will receive a Statement of Advice ('SoA'). We are required to provide advice that is appropriate to you and act in your best interests when providing you with personal advice.

Whether for a comprehensive financial plan that addresses all your needs, or limited advice for a more specific issue such as superannuation or life insurance, the SoA will contain the advice, the underlying basis for our recommendations and information regarding commissions, fees or associations with third-parties that may influence that advice.

We may also provide you with a Record of Advice ('RoA') where further advice is sought in relation to that provided in the SoA and where there is no significant change to your circumstances.

A Fee Disclosure Statement, which contains information about the services you are entitled to receive and actually received, and the fees paid, may also be provided to you where you pay an ongoing fee for a period of more than 12 months.

If we recommend a specific product (except securities) we will also provide you with a Product Disclosure Statement (PDS) relevant to that specific product that will contain information to enable you to make an informed decision regarding the key risks and benefits of utilising that product.

The advice and recommendations provided will be impacted if you provide incorrect, incomplete or limited information.

In other circumstances we may provide you with only general advice. In such circumstances we are obliged to warn you that our general advice provided to you as a retail client does not take account of your objectives, financial situation or needs. Therefore, we recommend that you take all reasonable steps to fully understand the outcomes of specific products and strategies adopted in relation to utilising the services provided by Spring FG on a general advice basis.

Where we provide general advice regarding a specific product0



(except securities) we will still provide you with a Product Disclosure Statement (PDS) relevant to that specific product that will contain information to enable you to make an informed decision regarding the product.

We are registered with Australian Government's Tax Practitioners Board as a tax (financial) adviser (number: 24914209) and in certain circumstances we may also provide you with tax (financial) advice services that relate to ascertaining or providing advice about liabilities, obligations or entitlements under taxation law in the context of financial planning or financial product advice.

If you are classified as a sophisticated investor, professional investor or wholesale investor under s708, s761G or 761GA of the Corporations Act, you may be eligible to participate in offers that are only available to 'wholesale clients' as that term is defined under the Corporations Act. Certain protections available to retail clients under the Corporations Act will not be available in respect of those offers and the offers will not be made under a prospectus or PDS.

Method of providing financial services

If you wish to utilise our services, you may issue us with requests or instructions in any of the following ways:

- In person.
- Via the telephone and/ or video link (please note that telephone and video calls may be recorded).
- In writing (including email where authorised by us).
- You must check and confirm with us that instructions sent via email have in fact been received by us and at all times telephone confirmation of orders and instructions is required before Spring FG will execute transactions with you or on your behalf.

Professional Indemnity insurance

Spring FG maintains professional indemnity insurance cover that satisfies the compensation requirements under s912B of the Corporations Act 2001 (Cth) and ASIC RG126. It also covers former representatives/employees who worked for Spring FG at the time of the relevant conduct.

Our record-keeping obligations

Spring FG will seek to ensure that comprehensive and accurate records of all advice/recommendations provided and transactions undertaken are properly maintained.

You may request to inspect any and all information we retain regarding you and your personal circumstances and or with regard to the products and services we have provided to you within normal business hours.

Who do we act for?

We are responsible for the financial services we provide to you under our Australian Financial Services Licence and we do not act as a representative of any other licensee in relation to the services or products we provide.

We may also arrange for you to be supplied with financial services and products issued by non-related product providers, or in certain cases specialist advisers operating under authority of another AFSL-holder. We may receive a fee or commission payment from these non-related parties as a result of you investing in or purchasing their products or

services.

Any remuneration that Spring FG may derive is included in the fees and commissions you pay as outlined herein and/or in a SoA or PDS provided to you - you do not pay extra.

Contact details

Sydney (Head Office) Spring FG Wealth Pty Ltd Level 11, 95 Pitt Street Sydney NSW 2000 Ph: (02) 9248 0422	PO Box R1932 Royal Exchange NSW 1225 www.springFG.com info@springFG.com
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Melbourne Ground Level 99 King Street Melbourne Vic 3000 Ph: (03) 9248 6001	Canberra Level 9, Nishi 2 Phillip Law Street Canberra ACT 2601 Ph: (02) 6243 3628
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Brisbane Level 36, Riparian Plaza 71 Eagle Street Brisbane Qld 4000 Ph: (07) 3121 3189	Wollongong Lower Ground Level 65-67 Burelli Street Wollongong NSW 2500 Ph: (02) 9248 0424
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Newcastle
17 Bolton Street
Newcastle NSW 2300
Ph: (02) 9248 0430

Remuneration/commission/benefits expected to be received by Spring for provision of financial services

This section provides you with examples of how and when:

- We might charge you for services provided to you by us.
- We might receive product rebates and other forms of commission or payments from product providers when you use/buy their products and service.

You should note that these examples are provided as a guide only and that any fees, rebates, commissions or fees payable to us by you or by a product or service provider will be disclosed to you in detail in a separate document, such as the SoA, PDS or Fee Disclosure Statement, if and when required prior to your implementation of the recommendations.

Fees you may be asked to pay us:

Initial Consultation

Our initial consultation with you is generally on a no-obligation and no-fee basis.

Plan Preparation Fees

If you decide to engage us to prepare a full financial plan (SoA) we will generally charge you a Plan Preparation Fee in the range of \$1,500 (plus GST) up to \$4,500 (plus GST) or more. In certain circumstances, limited plans (or limited SoAs) that cover only specific issues (as directed by you) may be provided at a lower cost or no cost.

Plan Implementation Fees

If you engage us to implement strategies; products; and/or investments that have been recommended through a full or limited SoA we may charge you an Implementation Fee.



This can vary considerably from \$1,000 (plus GST) to \$8,000 (plus GST) or more depending on the nature, scale and complexity of the strategy, products, and/or investments being implemented.

In certain circumstances we may also recoup from you out-of-pocket fees and an administration fee when we have engaged third-parties to, for example, establish a self-managed superannuation fund for you; or assist with your estate planning needs (such as wills and powers-of-attorney); or the establishment of other trust or company structures.

Ongoing Adviser Service Fee

If you wish to engage us to provide ongoing advice and resources in managing your ongoing financial affairs, and ongoing services in monitoring and reviewing your investments and strategy, we may charge you an Adviser Service Fee. This may be calculated as a percentage of the value of the assets we provide you with services and resources regarding or help you manage or it may be calculated as a fixed fee that we negotiate with you if you prefer. In the case of a percentage this would generally be in the range of 0.65%-0.95% pa meaning we would charge you \$650-950 pa for every \$100,000 in net assets that we provide you services and resources regarding or help you manage. In the case of a fixed fee this would generally start at a minimum of \$2,500 pa and could be considerably higher depending on the nature and scale of your investments and the ongoing services and resources we provide.

Such fees are generally payable in monthly instalments.

Share Trading

If you trade shares through us we will charge you brokerage when we buy or sell shares on your behalf. This brokerage is generally calculated relevant to the size and frequency of trades and can vary considerably however is generally in the range of 0.55% to 0.85% of the value of the trade generally with a minimum contract note rate of \$55 to \$85 per contract note.

Administration and management fees charged by product providers

Our fees (and any product rebates or commissions we receive) relate to the provision of our services to you, and do not relate to the cost particular product providers charge for using/operating their products.

Product costs are charged separately by the product provider. In such circumstances the provider will disclose such fees in their PDS which will outline the costs of each product and will be provided to you any time such fees are applicable.

Product Rebates & Commissions and Other Fees

If you engage Spring FG to implement strategies, products, services, or investments, financial product providers and other third-parties may pay us (and/or one of our subsidiary companies) rebates, commissions or fees when you use/buy their products and services.

Such payments do not change the cost of the product or service for you. If they do we are obligated to obtain your prior consent.

Any rebates, commissions or fees payable to us as a result of implementing the financial strategy or financial product recommendations contained in an SoA, or subsequent SoAs will be disclosed to you in detail within an SoA (or other such documentation) if/when required prior to your implementation of the recommendations. Examples of

rebates, commissions and fees we may be entitled to from third-parties are summarised below:

- If we organise an insurance policy for you we may be paid a commission on establishing the policy and each time you renew the policy. Commissions on insurance policies vary widely depending upon the provider and the time and nature of the policy. The range is generally between 30% and 80% of the first years' premium for a policy with ongoing commission of between 10% and 35% for the life of the policy.
- In certain circumstances if you are an existing retail client and you have previously invested in managed investment schemes, structured products or certain superannuation funds or administration platforms we may be paid a commission or rebate by the product provider (calculated as a percentage of the value of your investments) when you make further investments into those products. Again, the range varies considerably from 1.0% to 4.4% as an establishment fee based on the initial or further investment/s.
- We may also be paid an ongoing commission or rebate (calculated as a percentage of the value of your funds) whilst your funds continue to be invested with that product provider and this is generally between 0.25% to 0.5% pa. In some circumstances these fees in part or whole may be rebated to you. If you are a wholesale client these types of fees and rebates may be paid to us, whether or not the arrangement was pre-existing.
- If we refer you to a lender or you utilise the services of our related entity Spring FG Finance Pty Ltd, we or they may be paid an initial referral fee and an ongoing referral fee for the term of your loan agreement. The quantum of any fees paid by banks (and other lenders) varies but is generally in the range of 0.55% - 1.10% of the initial loan amount; with an ongoing trailing commission in the range of 0.11% - 0.385% of the current outstanding balance of the loan for the life of the loan.
- If you source/buy an investment property or family home through our related entity Spring FG Realty Pty Ltd they will generally be entitled to an agents' commission from the vendor of the property. The range varies but is generally in the range of 4.0% to 6.0% of the value of the property. A portion of this commission may be paid to Spring FG Wealth Pty Ltd as a referral fee.
- If you engage Spring FG Realty Pty Ltd as a buyers' agent to source and negotiate the purchase of an investment property or family home (in which case they will not be entitled to act as an agent for the vendor of that property) they will generally charge you a fixed-fee of between \$10,000 and \$15,000 plus an acquisition fee of between 0.5% and 1.5% of the value of the property. A portion of these fees may be paid to Spring FG Wealth Pty Ltd as a referral fee.
- In certain circumstances if you are an existing retail client and we previously helped you establish a bank or margin lending account we may be paid an ongoing rebate (calculated as a percentage of the value of your funds on deposit or margin loan) whilst your funds are invested with, or loan is current with, that product provider and this is generally in the range of 0.25% to 0.5% pa. In some circumstances these in part or whole may be rebated by us to you. If you are a wholesale client or we provide you general advice or no advice these types of fees and rebates may be paid to us whether or not the

arrangement was pre-existing.

You are of course under no obligation to implement any specific product recommendations provided to you by any representative of Spring FG.

Adviser and Staff remuneration

Spring FG's employees and directors may be remunerated by way of salary, profit share and/or bonuses. Your adviser is paid an annual salary and may be paid a bonus based on his/her performance and/or overall team performance.

Other related entities of Spring FG Wealth Pty Ltd may from time-to-time pay the representative's salary or bonuses for work done on their behalf.

Third-party Referrers

You may have been referred to us by a service provider who may receive financial or non-financial benefits from us. This should have been disclosed to you by the service provider in question. Please note that any such benefits will not impact fees charged to you or the price you will be offered for any other product.

All referral fees, rebates and commissions will be disclosed to you and paid as required and permitted by law.

Disclosure of any relevant conflicts of interest

Spring FG Wealth is a wholly-owned subsidiary of Spring FG Limited (ABN 87 169 037 058). Spring FG Limited is an ASX-listed (ASX: SFL) diversified financial services company with several other subsidiaries.

Our goal is to provide you with holistic and integrated services to maximise the value of the relationship you have with us for your benefit and for the benefit and profitability of our overall group of companies.

As such we will generally always encourage you to use the services of our subsidiaries (our related trading entities) and referral partners to assist in implementing that advice and/or providing products and services related to that advice. In many circumstances the services provided by these subsidiaries and referral partners, and the role they play may be central to the overall recommendations we make. In summary:

Spring FG Accounting Pty Ltd provides accounting and taxation services and if such services are required by you we will generally refer you to Spring FG Accounting Pty Ltd.

Spring FG Finance Pty Ltd provides finance advice and mortgage brokerage services and if such services are required by you we will generally refer you to Spring FG Finance Pty Ltd (Australian Credit Licence 391655).

Spring FG Realty Pty Ltd provides investment property services. Should an SoA include recommendations to invest in property, or should you wish to invest in property when we have not prepared an SoA for you we will generally refer you to Spring FG Realty Pty Ltd.

Fairbridge Financial Services Pty Ltd (ABN 24 601 706 316) (Fairbridge) is a specialist personal insurance specialist company with which we have an exclusive referral relationship for the provision of personal insurance advice and implementation of personal insurance policies. Should your SoA include recommendations related to your personal insurance needs we will refer you to Fairbridge for those needs. If you establish or renew policies through Fairbridge we

will be entitled to a share of fee or commission income that they are entitled to receive from you or product providers. This is generally 20% of such fees or commissions.

Fairbridge is a corporate authorised representative (No. 465321) of ClearView Financial Advice Pty Limited (ABN 89 133 593 012 AFSL 331367)

Such referrals will generally represent a "conflict of interest" as we, our related trading entities and/or Spring FG Limited will likely benefit (financially or otherwise) through you using their services and/or acquiring products or other services through them.

When we make such referrals, you are of course under no obligation to use the services of these entities.

Spring FG does not have any other relationships or associations which might influence us in providing you with our services. If we believe a conflict may arise we will advise you in the SoA or otherwise prior to providing such product or service.

Dispute Resolution

Spring FG has an internal dispute resolution process in place to resolve any complaints or concerns you may have, quickly and fairly. Any complaints or concerns should be directed to the Complaints Officer (by telephone, facsimile, or letter) at the address and telephone/fax numbers provided above, or by email to compliance@springFG.com.

We will provide acknowledgement of receipt of written complaints immediately upon their receipt. We will investigate your complaint, and provide you with our decision, and the reasons on which it is based, in writing.

If you are dissatisfied with the outcome, you have the right to lodge a complaint with the Credit and Investments Ombudsman (formerly known as the Credit Ombudsman Service or COSL), an approved external dispute resolution scheme, of which Spring FG is a member. You may also make a complaint via the ASIC free-call Infoline on 1300 300 630.

Credit and Investments Ombudsman
PO Box A252
South Sydney NSW 1235
Telephone: 1800 138 422
Facsimile: 02 9273 8440
Website: www.cio.org.au

Privacy

Spring FG is committed to compliance with the Privacy Act and the Australian Privacy Principles, and providing you with financial products and services in a manner which ensures your right to privacy is respected.

We only collect, use and retain personal information which is necessary to provide you with access to, and information about, our services.

Where we disclose your personal information to external parties, such as our professional advisers, they are required and committed to protecting your privacy.

If you wish to access or update information we hold about you, please ask us and we will make arrangements for you to do so within normal business hours.

A copy of our privacy policy is available from us and is also available on our website www.springFG.com.

Please contact us if you have any concerns.

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spring'FG WEALTH PTY LTD

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