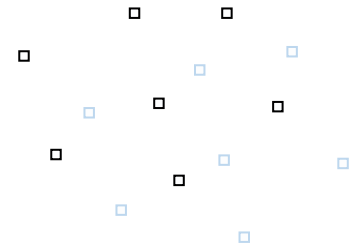




Licensee | Advice | Investment & Wealth Management



FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) is issued by:

Australia National Investment Group PTY LTD [ANIG WM]

ABN: 40 636 343 630

AFSL No.: 522028

This Financial Services Guide (FSG) is an important document which provides you with information about Australia National Investment Group PTY LTD (ANIG Wealth Management or ANIG WM) and help you decide whether to use our financial services. ANIG and its Authorised Representatives are required to give to retail clients/investors this FSG in accordance with our relevant Australian Financial Services Licence (AFSL) and it should be read in conjunction with your Adviser's Profile.

ABOUT THE FINANCIAL SERVICES PROVIDED BY ANIG:

Australia National Investment Group PTY LTD, trading name ANIG Wealth Management or ANIG WM holds an Australian Financial Services Licence (AFSL) Number 522028 and authorises Financial Advisers under its AFSL. Our contact details are listed below. ANIG is responsible for any advice you receive.

Head Office: Level 33, 264 George Street, Sydney, NSW, 2000

Phone: 02 9258 1091

Fax: 02 9258 1111

Email: info@anig.com.au

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

EVERYTHING ABOUT ANIG

About ANIG

Australia National Investment Group Pty Ltd is an Australian Financial Services Licence holder (AFSL No. 522028) under which it is licensed to provide general and personal financial product advice about, and deal in, certain financial products on behalf of retail and wholesale clients. Australia National Investment Group PTY LTD is a privately owned and operated Australian company that is not owned or associated with any Bank, Insurer or Funds Management business. ANIG WM is the Licensee that authorises its Authorised Representatives and Corporate Authorised Representatives to provide advice to retail and wholesale clients and is ultimately responsible for the advice provided to you.

Authorised Representatives are the Financial Advisers to provide the following financial services on behalf of ANIG WM:

1. Provide financial product advice, and
2. Deal in a financial product by arranging for another person to issue, apply for, acquire, vary or dispose of a financial product.

Approved Product List

Your Adviser can provide advice on a wide range of financial products however, they are required to recommend those approved by ANIG WM which can be found on the ANIG 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 ANIG WM 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.

For a financial adviser to provide financial advice in Australia we are required to confirm to you the retail or wholesale client that we are licensed to provide the financial services advice. The only available way for an adviser to meet such obligation is by either owning their own Australian Financial Services License (AFSL) or be authorised to provide advice through a licensee arrangement.

ANIG WM's obligation: ANIG WM is the licensee and holder of the AFSL No. 522028. Your adviser is authorised by ANIG WM and to protect our operations and how your affairs are managed by our advisers, we provide a range of advisory and support services to our advisers in providing you advice. Some of these are technical, software and platform integration services, research, educational and administrative assistance.

Adviser Obligation: Your adviser is to provide you with the financial services and advisers are required to provide you with their Adviser Profile when they provide you with this FSG. Your adviser is registered onto ANIG WM's license and is provided with their personal Authorised Representative number to enable you to find them on the Australian Securities and Investment Commission (ASIC) website. The profile sets out the type of services they can provide and what they are authorised to provide under our licensee arrangement.

ANIG WM is licensed to provide comprehensive range of services and deal in financial products which include:

ANIG WM can provide advice on and deal in the following products:

- Superannuation and Self-Managed Super Funds
- Retirement Savings Account Products
- Interests in Managed Investment Schemes (incl. IDPS)
- Wealth Accumulation and Investing
- Retirement Planning
- Deposit and Payment Products
- Debentures, Stocks or Bonds issued by a Government
- Securities – Direct Equities
- Group Insurance
- Life Products, including:
 - Investment Life Insurance Products
 - Life Risk Insurance Products

Your adviser authorised by ANIG WM is to provide Personal Advice and only deal in any or all the above financial products or services.

We will only recommend a product or strategy to you after considering its suitability for your individual situation and needs.

We do not provide advice in any other area of insurance or investments but can refer you to a professional who specialises in other areas if requested.

Any arrangements you make with the other professional will be strictly between you and that person and neither Australia National Investment Group or our Authorised Representative accept any responsibility or liability for the advice given.

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 Australia National Investment Group 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 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.

BEFORE RECEIVING ADVICE

We are required to provide you with advice suitable to your needs and financial circumstances. To provide you with such quality advice, you need to help us understand and document your individual goals, objectives, your set financial situation and needs. You have the right not to divulge this information; if you do not wish to provide us with full and accurate information about your overall situation we are required to warn you about the potential consequences of us not having your full and accurate information prior to providing advice. You are required to read the warnings carefully and ask our Authorised Representative about these consequences if you are unsure.

How will you be educated about the risks associated with the financial products or strategies we recommend to you?

Your adviser is obliged to 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?

All information captured by your adviser is stored in a member databased maintained internally. Your adviser is required to 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. We maintain the internal databases, and portfolios are reviewed on a regular basis subject to your adviser/client membership agreement with us. If you wish to examine your file, we ask that you make this request via email to 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

Our processes are designed to give you advice which is appropriate and in your best interests.

For us to achieve that, you will need to provide us with accurate details of your personal objectives, current financial situation, needs and any other relevant information. You can choose not to provide us with this information. In that case 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 you choose to receive personal advice, we are required to 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 Authorised Representatives or financial advisers.

Other advice documents you may receive?

Statement of Advice (SoA)

Your adviser provides you with personal advice that takes into account your objectives, financial situation, or needs. Any personal financial advice we provide to Retail Clients will be confirmed in writing either in a Statement of Advice (SoA) or Record of Advice (RoA). The SoA document will contain the advice, the basis on which the advice is given, and more specific information about remuneration and any associations that may have influenced the provision of the advice by your adviser and other relevant persons. An RoA is issued if you receive further financial advice from your adviser. In other cases, you may be issued a Statement of Additional Advice or another Statement of Advice for further advice.

Unless otherwise stated, in these cases our advice to you will consider your personal circumstances, needs, and goals. We are obliged to ensure you fully understand the advice document. You should read the SoA or RoA carefully, to ensure that you fully understand any recommendations we make.

Do not implement your advice unless you do. There are exceptions to advice provided to Professional Investors, Sophisticated or Wholesale Clients where we may not provide them with written advice documents.

When will you receive a Compliance Documents / SoA?

The information will be recorded in a Client Information Questionnaire or a Financial Fact Find 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 an SoA, which will detail and consider your current financial situation and requirements.

The SoA provided will outline:

- What the advice covers (the scope of advice).
- Details of why you are seeking advice (i.e. your objectives, 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.
- Full disclosure of all payments to us (combination of 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 RoA advice document 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 a recommendations are made by your adviser for you to acquire a financial product, you must also be provided with a **Product Disclosure Statement (PDS)** from the issuing product provider. A PDS document 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 instruct us on how to buy or sell your financial products?

Clients 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 do you pay for the services provided by your adviser?

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

Advice Preparation Fee and Advice Implementation Fee:

The advice preparation fee and advice implementation will depend upon the complexity of the advice being provided;

Strategy	Advice Fee	Implementation Fee
Basic	\$550 – \$1,100	\$550 – \$2,200
Intermediate	\$1,100 – \$2,200	\$1,100 – \$4,400
Advanced	Per case basis	Per case basis
Business	Per case basis	Per case basis

Our fee structure is flexible and is driven by your needs. They are based on the time and service level required and the amount of benefit that you gain. The SOA preparation fee will depend on the complexity of your individual circumstances and the type of advice you require. The Implantation Fee will depend on the level of complexity of your situation and the advice provided. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.

Ongoing fee for advice:

If you elect to participate in an ongoing advice review program, there is the option to elect to pay a fee for the ongoing review of your financial planning strategy. This fee is based upon which package you are recommended, and the complexity of ongoing advice and the services provided.

If you elect to receive ongoing advice services from your Adviser, fees are applied based on the desired frequency of contact with your Adviser and the complexity of your circumstances. These fees may be a fixed dollar amount or an asset-based fee. The fixed fee typically ranges between \$660 and \$15,000 per annum, while the asset-based fee will not exceed 1.1% per annum (inclusive of GST) of the total value of your portfolio. We do not charge asset-based fees in respect of assets acquired using borrowed funds. All fees will be disclosed in the Statement of Advice. This fee may be paid by invoice or where authorised by you, deducted cost to you.

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.

Fee for advice:

Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on a fee for service basis, an hourly fee from \$330 may apply.

Brokerage on insurance products:

Brokerage is paid to us by the product provider and is not an additional cost to you.

- The relevant insurer will pay initial brokerage between 0% and 66% of the annual premium.
- Annual brokerage will be paid when you renew your policy each year. The rate of ongoing brokerage is between 0% and 33% of the annual premium for as long as you hold the product. Brokerage is paid to us by the product provider and is not an additional cost to you.
- In most cases, 66% of the premium is paid 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 ANIG WM and will be disclosed in the advice documents provided to you.

Referral Fees and Commissions

Under the FASEA Code of Ethics your Adviser is not permitted to directly receive any referral fees for acting on your behalf. Referral fees may, however, be paid to your Adviser's employer, or your Licensee. We will also not refer to a third party, or provide advice, in circumstances where there is a conflict of interest, unless it can be shown that this course of action is demonstrably in your best interest, and with your prior informed consent.

If there is a conflict of interest such that it is not demonstrably in your best interest, then we will decline to provide that advice. We require all of our Advisers to conduct due diligence on referral partners to ensure that referral partners are only recommended where they meet this requirement.

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.

In accordance with industry requirements and the law, the Licensee and your Adviser each maintain an Alternative Remuneration register that contains information about any alternative forms of payments or benefits over \$100 that may be received (e.g. tickets to events and conferences). If you wish to inspect the Alternative Remuneration register or ask any questions about this, please ask your Adviser. Your Adviser may not receive one-off benefits in excess of \$300 per annum from any individual service provider, or benefits that exceed \$300 per annum for a series of benefits from the same provider.

Other Services

Some Advisers may provide services other than financial product advice services, through separate business arrangements to their financial planning businesses. This may include, for example, accounting or legal advice, or advice in respect of real estate investments or lending products.

These other services are not provided under the Licensees' AFSs and the Licensees do not train, support, or supervise the provision of these other services and have no responsibility in relation to those services.

Examples of the services for which the Licensees are not responsible include, but are not limited to:

- General insurance services (for example, car insurance);
- Real estate and direct property advice;
- Taxation services, such as completion of tax returns;
- Accounting and audit services;
- Legal services;
- Consulting services; and
- Administration and compliance of self-managed superannuation funds.

What if I have a complaint?

We are committed to ensuring that your adviser provides you with quality advice. This extends to providing accessible complaint resolution mechanisms should you be dissatisfied with the service you receive from your adviser. We understand that sometimes there may be issues that you would like to resolve.

The recommended course of action is:

1. Speak to your advisor. Clarify why you are not happy and if there is additional information you require please request from your advisor or put this in writing. In our experience most issues arise from miscommunication so it may be able to be resolved by further explanations or information being provided.
2. Contact the licensee at Australia National Investment Group. We encourage you to contact us at our office or put in writing via email to resolve@anig.com.au. You will receive a response within 72 hours (3 working days) from a member of Australia National Investment Group (ANIG WM).

We will endeavour to resolve your complaint as soon as possible with a fair solution.

We will then have 45 days to respond to your complaint, although we will aim to respond sooner. If your complaint is complex and is likely to take longer than 45 days, then we will notify you prior.

3. External dispute resolution. This option can be triggered if you are not satisfied with our response, then you have the right to escalate the complaint to the Australian Financial Complaints Authority (AFCA). Australia National Investment Group (ANIG) is a member of AFCA. You can contact AFCA via the following details, quoting our membership number **76541**:

Online: www.afca.gov.au

Email: info@afca.org.au

Phone: 1800 931 678

Mail: GPO Box 3,
Melbourne, Victoria, 3001

Complying Compensation Arrangements

ANIG 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 ANIG WM). If you would like more information, please contact us.

Conflict of Interest / Do we have any association or relationship with a Financial Product Provider?

Australia National Investment Group (ANIG WM) is the licensee. We authorise our Corporate Authorised Representatives and Authorised Representatives to provide you with financial advice. We have no association with Financial Product Providers.

Our Privacy Policy

We are committed to protect and maintain the privacy, accuracy and security of the personal and financial information you give us. Keeping this information private is very important to us.

ANIG WM Privacy Policy explains in more detail our commitment to protecting your personal information. This privacy policy sets out the information handling policies of ANIG WM. We are committed to providing professional services and respecting the privacy of your personal information.

We are bound by the National Privacy Principles under the Privacy Act. This policy explains how we will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

Do we disclose your information with to other companies?

We may share information with organisations that assist us to administer your investments or provide you with products and services.

Type of information we may hold

The type of information we collect and hold about you varies depending on the type of product or service we provide you. You may choose not to provide us with your personal information. Depending on the nature and quality of the information you choose to withhold, we may not be able to provide you with accurate or complete financial advice.

How do we use your information?

We use the information to provide you with financial product advice or services, in particular to assess your risk tolerance and determine investment strategies and recommendations consistent with your financial needs, objectives and personal circumstances.

We may also use the information to send you material about other products and services. If you do not want to receive this type of material, please advise us and we will stop sending you this information.

How we handle a request for access to personal information

Under the National Privacy Principles, you have the right to access the information we hold about you. You can access the information in many ways, where you wish to access information about you, contact your advisor and they will make arrangements for you to do so. In some circumstances we may refuse you access to your personal information, these circumstances are limited to situations where your request may unreasonably impact upon another person's right to privacy. If we are entitled under the National Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

Anti-Money Laundry and Counter Terrorism Financing Act 2006

Australia National Investment Group (ANIG WM) has a number of obligations under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth).

These obligations may require us to carry out procedures to identify you and to verify the identification information provided. We may not be able to provide our services until all information required is received.

Anti-Money Laundering and Counter Terrorism Financing legislation and regulations also stipulate that we need to report certain information about our customers to relevant authorities, including the Australian Transaction Reports and Analysis Centre (AUSTRAC). Where such reporting has taken place, we may be prevented by this legislation from telling you. Where legally permitted or obliged to do so, we may disclose that information to regulatory or law enforcement agencies, to our related bodies or to other third parties.

Data Security

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure. We will not retain any of your information for any longer than it is required by us, except to satisfy statutory requirements of the Act. We may share information with organisations that assist us to administer your investments or provide you with products and services. It is a condition of our agreement with each of our external organisations that they adopt and adhere to this privacy policy. The information we collect from you may also be disclosed to third parties if the disclosure is required by or permitted by law. You have a right to refuse us authorisation to collect information from a third party. In the event that we or your adviser propose to sell a business of which you are a client, we or they may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

When we require identifiers

In some circumstances we are required to collect unique identifiers, for example, your Medicare or tax file number. We will not use or disclose this information other than when required to do so by law or, or when consented to by you.

