



# Financial Services Guide

## Part 1

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3 July 2019

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This Financial Services Guide has been authorised for distribution by the authorising licensee:

Harbour Financial Group Pty Ltd ('Harbour Financial Group')

ABN 86 632 080 838

Australian Financial Services Licence No. 515518 ('AFSL')

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This Financial Services Guide ('FSG or the 'Guide') provides you with important information about Harbour Financial Group Pty Ltd ('Harbour Financial Group'), its Corporate Authorised Representatives BSR Financial Advisers, Enhance Financial Partners and Sydney Aged Financial Advisers and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Harbour Financial Group;
- Harbour Financial Group as the holder of an AFSL;
- the financial services that Harbour Financial Group offers;
- the process we follow to provide financial services;
- how we, our associates, and Harbour Financial Group are paid;
- any arrangements which may influence our advice to you;
- how we and Harbour Financial Group protect your privacy;
- who to contact if you have a complaint or if you are not satisfied with the services provided

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Harbour Financial Group.

References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Harbour Financial Group, BSR Financial Advisers, Sydney Aged Care Financial Advisers and Enhance Financial Partners or your 'Authorised Representatives' of Harbour Financial Group, as the context requires.

# PART 1

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

## ABOUT Harbour Financial Group

Harbour Financial Group holds an AFSL issued by the Australian Securities and Investments Commission.

As Authorised Representatives, we act on behalf of Harbour Financial Group when providing the financial services we are authorised to provide under the Harbour Financial Group's AFSL.

Further information on these services is set out in the FSG Part 2 Adviser Profile.

As the holder of an AFSL, Harbour Financial Group is responsible for the financial services we provide to you. Harbour Financial Group acts on its own behalf when these financial services are provided to you.

## SECTION 1

### FINANCIAL SERVICES GUIDE

#### WHAT OTHER INFORMATION SHOULD YOU CONSIDER BEFORE DECIDING WHETHER TO PROCEED WITH OUR RECOMMENDATIONS?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

#### WHO PROVIDES THE FINANCIAL SERVICES DESCRIBED IN THIS FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Harbour Financial Group.

Part 2 of this Guide contains further details about your financial adviser, and our experience, qualifications and professional memberships.

#### WHO IS RESPONSIBLE FOR THOSE FINANCIAL SERVICES?

As the holder of an AFSL, Harbour Financial Group is responsible for the financial services we provide to you. Harbour Financial Group acts on its own behalf when these financial services are provided to you. In relation to the financial services offered in this FSG, Harbour Financial Group, as the holder of an AFSL, does not act on behalf of any other person or licensee. Harbour Financial Group is only responsible for the services offered in the FSG.

The law requires Harbour Financial Group to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Harbour Financial Group and / or its Authorised Representatives. Harbour Financial Group has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

#### WHAT FINANCIAL SERVICES DO WE OFFER?

We are authorised, on behalf of Harbour Financial Group to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide):

- deposit products;
- government debentures, stocks or bonds;
- life investment and life risk products;
- managed investment schemes including investor directed portfolio services;
- standard margin lending facilities;
- retirement savings account products;
- securities (e.g. shares) and;
- superannuation products.

Some of the services we can provide you (unless otherwise stated in Part 2 of this Guide) are:

- financial planning advice;
- wealth accumulation advice;
- superannuation advice, including self-managed superannuation funds;
- redundancy advice;
- retirement advice;
- gearing strategies;
- cash flow advice;
- social security benefits advice;
- life and disability insurance advice;
- estate planning services (financial planning);
- age care advice.

## **WHAT PRODUCTS ARE AVAILABLE?**

A range of financial products offered by many leading financial product providers are available to our advisers when they provide personal advice. Details of the available products our advisers are authorised to provide advice about are contained in the Approved Product List (APL).

Internal and external experts provide financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from.

When providing personal advice to you, our advisers may only recommend a product to you if they consider it is appropriate after considering your objectives, financial situation and needs. Your adviser is not required to tell you about products that are not on the APL.

## **HOW DO WE ENSURE THAT THE PERSONAL ADVICE WE GIVE YOU SUITS YOUR NEEDS AND OBJECTIVES?**

To ensure your adviser provides personal advice that is appropriate, we firstly need to understand your objectives, financial situation and needs. Your adviser (referred to as 'we' below) will follow a step-by-step process as outlined below:

- 1.) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
- 2.) We will collect all the information we need from you, including your objectives, financial situation and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing all information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request.
- 3.) We will help you identify your goals and may discuss your attitude towards investment risk.
- 4.) Where we recommend a financial product, we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these and other considerations, we will prepare and present you with a written SoA, or in some cases depending on the circumstances, a RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice.

Where we recommend financial products, we will provide you with a PDS or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to invest in or acquire that product.

- 5.) We will discuss our recommendations with you, make any changes you require and ask you

whether you would like us to implement those recommendations on your behalf.

- 6.) If you agree, we will then implement those recommendations.
- 7.) We will meet with you periodically to review your financial circumstances if we agree to an ongoing advice service arrangement which includes a regular review component. If an ongoing advice service arrangement is entered into, this will be documented in your Ongoing Advice Service Arrangement Letter and/or SoA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via a SoA or RoA, as outlined above. These circumstances may include:

- 1.) Where we provide you with only general advice, such as through seminars and newsletters;
- 2.) Further advice or verbal advice – if you previously received advice recorded in a SoA, any further personal advice provided by us may be recorded in a RoA. We will not necessarily provide you with a copy of the RoA unless you request it (see below).

## **WHAT DOCUMENTS DO YOU GET IF WE PROVIDE FURTHER ADVICE?**

Where a further review is conducted and personal advice is provided, in some circumstances we are not required to provide you with a SoA for this further advice. Where this is the case, if you have not already been provided with a RoA, you may request a copy of the RoA from us by contacting us (on any of the contact details set out in Part 2 of this Guide) for a period of seven years from when the further advice was first provided to you.

## **HOW CAN YOU INSTRUCT US?**

You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

## **OTHER SERVICES**

We do not provide services other than financial planning services. Examples of the services which Harbour Financial Group is not responsible for include:

- general insurance services (e.g. car insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- consulting services;
- administration and compliance of Self-Managed Superannuation Funds.

## **HOW ARE WE PAID FOR OUR SERVICES?**

We and Harbour Financial Group may receive:

- fees paid by clients;
- commissions paid by product providers;
- other benefits.

Fees and commissions are payable (as directed by your Authorised Representative) to Harbour Financial Group, who pay us 100% of any fees and commissions, the AFSL, Harbour Financial Group bills up to \$100,000 for its services.

Details of any fees, commissions or other benefits that we, Harbour Financial Group or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

## **WHAT TYPE OF FEES, COMMISSIONS, PAYMENTS AND OTHER BENEFITS DO WE RECEIVE FOR OUR SERVICES?**

If the fees, commissions or other benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after. If you receive general advice you may request particulars of the fees, commissions and other benefits that we may receive, within a reasonable time after this FSG is given to you.

The types of fees, commissions and other benefits that may be received by the Harbour Financial Group include the following:

### **Service fees**

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

### **Fees for advice**

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

### **Ongoing advice fees**

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services.

This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

### **Referral fees**

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the products involved.

We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

### **Payment methods**

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods.

Where it is debited from your investments it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

### **Commissions**

If you take out a financial product through us, Harbour Financial Group may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees, premiums and interest rate (in the case of margin loans) you pay for the product. They are not an additional cost to you. We may agree to rebate some or all of these.

The commission payable for different classes of financial products include the following:

## Investment products

For investment products, including superannuation and annuities, commissions are generally deducted from the funds you invest. Commissions on investment products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have acquired an investment product before 1 July 2014, commissions may be payable where Harbour Financial Group has an existing arrangement with the product issuer prior to 1 July 2013.

Harbour Financial Group may receive between 0% and 1% of your initial investment as initial commissions from product providers whose products are recommended to you. Harbour Financial Group may also receive ongoing commissions from the management fees of the product providers.

Ongoing commissions range between 0% and 1% p.a. of your investment balance. Harbour Financial Group may pass up to 100% of these commissions to us.

### Example

We recommended you invest \$10,000 in an investment product before 1 July 2014. The applicable initial commission is 1% and ongoing commissions are 1% p.a. Harbour Financial Group may receive initial commission of \$100 and may pass up to \$100 of that to us. Assuming the investment amount stays the same, each year Harbour Financial Group will receive ongoing commission of \$100 and may pass up to \$100 to us.

## Life Insurance Products

Initial and ongoing commissions from insurance providers may be received by Harbour Financial Group. These commissions are paid to Harbour Financial Group by the company that issues the product that we recommend to you and they are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer to Harbour Financial Group. Ongoing commissions are payments paid by product issuers to Harbour Financial Group in the years after the first year. These commissions may be passed onto "us"/"the adviser" or nothing at all, depending what is applicable to the circumstances.

If you initiate an increase to your cover, Harbour Financial Group may receive an initial commission and ongoing commissions on the annual increase to your policy cost. The ongoing commission on a client initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), Harbour Financial Group may receive up to 38.5%

(excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Harbour Financial Group may receive is set out in the table below:

Date a new product is issued	Initial commission (% of annual policy cost or increase excl. GST)	Ongoing commission pa (% of annual policy cost or increase excl. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 - 140%	0 - 38.5%
1 January 2018 - 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 - 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%

\* Harbour Financial Group may receive the pre 1 January 2018 commission rates above from the product issuer if:

- > your policy was issued before 1 January 2018 and you exercise an option or apply for additional cover under your policy after 1 January 2018; or
- > your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

### Example

We recommend an insurance product to you and it is applied for and issued on 2 February 2018. The annual policy cost is \$450. Harbour Financial Group may receive up to \$360 (80% excl. GST) as an initial commission and may pass up to \$360 to us. Assuming the policy cost stays the same each year, Harbour Financial Group may receive up to \$90 pa (20% excl. GST) as an ongoing commission and may pass up to \$90 pa to us.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to Harbour Financial Group in respect of this increase will be \$80 (80% excl. GST) as the increase has occurred in 2018. The ongoing commission payable to Harbour Financial Group in respect of this increased policy cost will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to Harbour Financial Group in respect of this increase will be \$60 (60% excl. GST). The ongoing commission payable to Harbour Financial Group in respect of this increase will be \$20 pa (20% excl. GST), payable in respect of the

period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide to you. Where personal advice is provided to you, you'll also find details of the commission that Harbour Financial Group and we are entitled to receive if you decide to purchase a life insurance product, in your SoA or RoA.

### Margin lending Products

If we organise, or increase a margin loan for you, Harbour Financial Group may receive payments in the form of ongoing commissions from the margin loan provider. Commissions on margin lending products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have entered into a margin lending product arrangement prior to 1 July 2014, commissions may be payable where Harbour Financial Group had an existing arrangement with the margin loan provider prior to 1 July 2013. These commissions range between 0% and 0.5% p.a. of your loan balance. Harbour Financial Group may pass up to 100% of these commissions to us.

#### Example

We recommend you borrow \$10,000 through a margin loan. The applicable ongoing commission is 0.5% p.a. Assuming the loan balance stays the same, each year Harbour Financial Group will receive ongoing commission of \$50 and may pass up to \$50 to us.

### DOES HARBOUR FINANCIAL GROUP CHARGE ANY FEES?

Harbour Financial Group will not charge you any additional fees. Where its Authorised Representatives generate fees and other revenue from the provision of its services, Harbour Financial Group will remit 100% of that revenue to its Corporate Authorised Representatives BSR Financial Advisers, Sydney Aged Care Financial Advisers and Enhance Financial Partners. BSR Financial Advisers, Sydney Aged Care Financial Advisers and Enhance Financial Partners will remit that revenue to their Authorised Representatives Phillip Reid, Michael Johnson, Nathan Franks, Robin Franks, Debbie Wong and Hamish McGilvray.

### OTHER BENEFITS

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is up to \$300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes.

A copy of the register is available on request for a small charge.

### WILL ANY OTHER PARTIES BENEFIT FROM THE FINANCIAL SERVICES OFFERED IN THIS FSG?

Harbour Financial Group may benefit from remuneration paid in respect of the financial services offered in this FSG

Product providers in the Harbour Financial Group receive product fees and may be entitled to certain expense reimbursements if you invest in their products. Product fees are generally calculated as a percentage of the amount or value of your investment in these products.

Certain other financial products from or to a customer. In these circumstances, instead of a fee, Harbour Financial Group incorporates margins (being the difference between what you pay for a financial product and what it costs Harbour Financial Group to issue it to you) into the buy, sell or issue price or rate.

Harbour Financial Group companies may also benefit from other roles they perform in a transaction. When these products or services are provided to you, details of these fees or benefits and how they are calculated will be disclosed in the relevant PDS or other disclosure document that will be provided to you by us.

### WHAT FEES DO WE PAY TO SOMEONE WHO REFERS YOU TO US?

If you are referred to us, we may pay the referrer a fee. The fee varies according to the referrer and financial products involved. The fee may be a flat fee of up to \$2,000 plus GST. We may pay these fees upfront when the financial service is provided, or the financial product is provided. Any amount paid will be confirmed in your SoA or RoA. For example, if an accountant refers their client to us, we may offer \$100 referral fee when that client signs on for a financial plan fee with us.

## SECTION 2

### PRIVACY STATEMENT

#### WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

#### COLLECTING AND DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Harbour Financial Group is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

#### OTHER IMPORTANT INFORMATION

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available at [www.harbourfinancialgroup.com.au](http://www.harbourfinancialgroup.com.au)

It covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and;
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

#### DEFINITIONS

“We”, “our”, “us” means Harbour Financial Group Pty Ltd and its Corporate Authorised Representatives and other Authorised Representatives.

## SECTION 3

### ARE YOU SATISFIED?

#### WHAT TO DO IF YOU HAVE ANY CONCERNS ABOUT OUR SERVICES

Both we and Harbour Financial Group endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1.) Contact your adviser first about your concern.
- 2.) If your concern is not resolved to your satisfaction, you may contact Harbour Financial Group by:

**Writing to:**

National Manager  
Advice Complaints  
Harbour Financial Group Pty Ltd  
Suite 2, Level 10, 83 Clarence Street  
Sydney NSW 2000

**Email:**

[info@harbourfinancialgroup.com.au](mailto:info@harbourfinancialgroup.com.au)

- 3.) The Financial Planning Association of Australia Limited (FPA), is the peak professional body for financial planning in Australia. The FPA provides the leadership and professional framework that enables members to deliver quality financial advice to their clients. All FPA members are bound by professional, technical and ethical standards as provided in the FPA Code of Professional Practice. The FPA has effective and appropriate policies and procedures in place to assist you with your complaint and ultimately help protect consumers and those planners doing the right thing. You may contact the FPA by:

**Writing to:**

The Investigations Manager  
Financial Planning Association of Australia Ltd  
GPO Box 4285  
Sydney NSW 2001

**Website:**

[www.fpa.asn.au](http://www.fpa.asn.au)

**Phone:**

1300 626 393

- 4.) If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Australian Financial Complaints Authority (AFCA) by;

**Writing to:**

Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001

**Email:**

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

**Website:**

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

**Phone:**

1800 931 678

- 5.) The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring that Australia's financial markets are fair and transparent and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

**Writing to:**

Australian Securities & Investments Commission  
GPO Box 9827  
Your Capital City

Or

PO Box 4000  
Gippsland Mail Centre  
Victoria 3841

**Website:**

[www.asic.gov.au](http://www.asic.gov.au)

**Phone:**

1300 300 630

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.