



Innate Wealth Pty Ltd

Financial Services Guide (Inclusive of Credit Guide)

*What you need to know about our
services and how we work with you*

Version 20.00
Date: 2 July 2019

1. About this Financial Services Guide

This Financial Services Guide (FSG) provides you with important information to help you understand the services we offer. After reading this FSG, you will know:

- Who we are and how we can be contacted;
- The financial planning & credit assistance services and products we provide advice on;
- Disclosure of any association or relationship that could create potential conflicts of interest that might influence the financial services we offer;
- The financial advisers at Innate Wealth Pty Ltd;
- How Innate Wealth Pty Ltd and our Authorised Representatives are paid for the services provided;
- The process we follow to provide financial services;
- How we collect, treat and maintain your personal information;
- Our privacy policy;
- How to access our internal and external complaints handling arrangements.

2. About Innate Wealth

Innate Wealth Pty Ltd (ABN 66082986641) (“Innate Wealth”) has been involved in financial planning for our clients since 1984 and is a Financial Planning Association (FPA) Professional Practice and bound by its Professional Code of Conduct and Ethics.

Innate Wealth is not aligned to any Bank, Life Insurance company or Industry Fund.

Innate Wealth is a holder of an Australian Financial Services Licence (229242) and an Australian Credit Licence 229242.

Our contact details are:

Offices 9-12 Arabin Plaza
Arabin Street
Keilor Victoria 3036
Tel No: (03) 9999 4100
Fax No: (03) 9999 4150
Email: admin@ifsg.com.au
Website: www.ifsg.com.au
ABN: 66082986641

We also have an office in Kew where our Authorised Representatives will conduct appointments from.

Innate Wealth appoints Authorised Representative to act on its behalf for the provision of authorised financial services. Your Adviser is an Authorised Representative of Innate Wealth Pty Ltd. Innate Wealth is therefore responsible for the financial services provided by it and its authorised representatives. Innate Wealth has authorised its advisers to distribute this Financial Service Guide.

Under its credit licence, Innate Wealth also appoints Credit Representatives to provide credit assistance services on its behalf. Your adviser may also be a Credit Representative of Innate Wealth.

How will you receive our advice?

You are entitled to receive a 'Statement of Advice (SOA)' on the first occasion that we provide you with personal advice, this document will:

- Explain the advice and the basis of the advice;
- Provide information about our remuneration and commissions (if any), including the amount of the remuneration, commission or other benefits that cannot be ascertained at the time of this FSG; and
- Disclose any associations or relationships that could potentially influence us in providing the advice.

After providing you with our Statement of Advice, you may then decide whether or not to act on the advice provided. Any ongoing personal advice that we may provide will be documented in a further 'Statement of Advice (SOA)' or a 'Record of Advice (ROA)' depending on the nature of advice.

Copies of all advice documents will be retained on your client file and you may ask for a copy of these documents at any time, subject to availability of at least seven years after the date on which the advice is provided.

Before the implementation of any recommendations as outlined in your Statement of Advice, you will be asked to sign an authority to proceed.

We will also provide you with, or explain how to access, a Product Disclosure Statement ('PDS') issued by the product issuer for any financial product we recommend (other than direct listed securities). The PDS contains information about the costs, benefits, risks and other features of the recommended financial product. You should read this information to enable you to make an informed decision when purchasing the recommended financial product.

Where we provide you with credit assistance services, your advisers will conduct an 'unsuitability assessment' to determine whether the credit contract recommend is suitable for you. We will generally provide the written assessment to you as part of your Statement of Advice or Record of Advice document.

If your adviser determines that the credit contract will not be suitable for you, either because you could not repay the credit without suffering financial hardship, or it just does not meet your needs or requirements, then the adviser cannot provide credit assistance to you in relation to that contract.

You may request a copy of your unsuitability assessment free of charge within 7 years of being provided a quote. We will provide this to you within 7 business days if you request it within two years of the quote, or within 21 business days after this time.

3. Our Services & Fees

Innate Wealth is authorised to provide advice and arrange transactions on the following strategies and products:

<i>Services</i>	<i>Products</i>
<ul style="list-style-type: none">▪ Self Managed Superannuation Funds (SMSFs)▪ Retirement Planning▪ Retrenchment and Termination of Employment Advice▪ Aged Care Facility Planning▪ Superannuation Strategies▪ Wealth Creation Strategies▪ Wealth Protection▪ Investment Advice▪ Cashflow Management▪ Debt Management & Budgeting▪ Business Succession Planning▪ Business Risk Management Strategies▪ Social Security / Centrelink entitlements▪ Estate Planning	<ul style="list-style-type: none">▪ Deposit products▪ Managed investment funds and trusts▪ Wrap accounts and master trusts▪ Superannuation and retirement savings account products▪ Risk Insurance▪ ASX Listed Securities▪ Government Stocks and Bonds▪ Annuities, allocated pensions and account based pensions▪ Managed Investment Schemes▪ Margin lending facilities (standard)▪ Home and business loans▪ Personal and Business leasing▪ Reverse Mortgages▪ Managed Discretionary Accounts (MDAs)▪ Property Investments

Our Authorised Representatives can only provide advice on financial products within these classes where they appear on the Innate Wealth 'Approved Product List'. The Approved Product List includes a large range of investment and insurance products for which the appropriate research and analysis has been undertaken.

An Authorised Representative of Innate Wealth cannot advise you on, or influence you in favour of, a financial product which:

- Is not on our approved product list; or
- Is a product they are not authorised to provide advice on.

Credit Services

Innate Wealth has a number of arrangements with credit providers to provide credit services. These providers have associations with a number of lenders to assist you with your lending needs including:

- Home and investment loans
- Reverse Mortgages
- Personal and Commercial leasing
- Personal lending needs
- Transactional Banking Requirements

We will only recommend that you apply for, make an increase to or remain in a credit / lease contract with a particular provider if we assess that the credit / lease contract is suitable to help you address your stated needs and objectives.

We will provide you with information on a broad range of finance providers and loan products. Once you have chosen a loan or lease that is suitable for you, we will assist in obtaining approval for the finance. We source finance products from a panel of finance providers.

Innate Wealth may also use the services of FinSure an aggregation service, to provide access to a wide range of credit products through a large range of credit providers. In addition to the credit providers below.

Our Current Top 6 providers to which our Representatives introduced borrowers are

1. Westpac
2. Commonwealth Bank of Australia (CBA)
3. National Australia Bank (NAB)
4. Resimac
5. ANZ
6. Bank of Queensland

Under the Act, we are obliged to make sure that any loan, or principal increase to a loan, or lease that we assist you to obtain is not unsuitable for you. We will need to ask you a series of questions to make this assessment. The law requires us to:

- Make reasonable enquiries about your borrowing objectives and requirements;
- Make reasonable enquiries about your financial situation; and
- Take reasonable steps to verify the details of your financial situation.

Credit will be unsuitable if, at the time of making the assessment, it is likely that, at the time the recommended loan or lease is made:

- You cannot afford to repay the loan or lease or can afford to repay it only with substantial hardship; or
- The loan or lease does not meet your borrowing objectives and/or requirements.

For these reasons, we must ask you to provide us with a significant amount of information, much of which we will need to verify. It is therefore very important that the information you provide to us is accurate and complete.

If we provide you with credit assistance, we are required to provide you, upon your request, a copy of our preliminary credit assessment for up to seven years after the date of the assistance.

We do not provide legal advice. It is important to understand your legal obligations under a proposed loan or lease and, if financial advice is not provided, the financial consequences imposed by the debt. If you have any doubts, you should obtain independent financial and legal advice before you enter into any finance contract.

We do not make any representations about the current value of any real estate you finance through us, or the future prospects of its value. You should always rely upon your own enquiries.

How will I pay for the service?

Strategic Advice (which includes investment advice)

Innate Wealth operates on a fee for service basis for our initial advice and our ongoing advice service.

Fees are charged from a rate of \$165 (GST Inclusive) per hour, depending on which financial adviser, paraplanner or administrative assistant is involved in providing our service to you.

Initial Advice

A fee for service will be charged for our written recommendations (Statement of Advice). The cost to prepare our Statement of Advice is dependent on the complexity of the advice. It is calculated on the anticipated time, experience and expertise required in formulating and documenting the advice strategy.

Innate Wealth has a minimum fee for preparing a Statement of Advice of \$3,300 (inclusive of GST), however this fee may vary according to the intricacy and complexity of the advice required and will be mutually agreed by you and our office prior to preparing the advice.

Ongoing Advice

Depending on your ongoing advice service, you might want to meet with us regularly to review your plan based on changes to your situation, legislation, and market conditions

Your adviser may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be either a set amount based on the time involved and/or an amount of funds under our advice.

If you elect to participate in Innate Wealth's ongoing maintenance program, we will ask that you sign a Financial Services Agreement (FSA). The FSA will be tailored to meet your individual requirements and will consist of one or both of the following components:

- Strategic Partner Program
- Enhanced Investment Program

Your Financial Planner will discuss this with and will set out the details in your Statement of Advice.

Your Financial Planner is also required to provide you with an annual 'Fee Disclosure Statement', which outlines the fee you have paid to your Financial Planner and the services that your Financial Planner has provided you.

Please note that, with respect to ongoing services, Innate Wealth may receive a commission based fee due to the existence of legacy based products. In these instances, the commission fee will generally be offset against the advice fee. Details of which will be disclosed in your Statement of Advice.

Wealth Protection

If you purchase or retain a life insurance policy on our recommendation, we may receive a commission payment from the insurer who issues the policy. 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 varies depending on the issuer and the product. This can range between 0% and 130% of your first years' premium. The ongoing commission varies depending on the issuer and the product. This can range between 0% and 30% of your annual premium.

Commissions (if any) for personal insurance products will be considerably less than stated above for new policies.

Innate Wealth will provide you with a choice of fee for service or commission on any recommended insurance product. Due to design and cost features of the insurance product, you may be given the choice of payment that suits your individual circumstances. Commissions are taken out of and therefore increase the premium that you pay. This is not a separate charge to you.

As is required by law, all fees, and commissions and on ongoing fees will be disclosed to you in a tailored Statement of Advice.

Credit Services

We may charge you for our services if you apply for a home loan, an investment property loan, a personal loan or lease. If a fee is to be charged, this will be disclosed to you in a Credit Quote which will be provided to you before applying for finance.

You may need to pay fees to the finance provider as part of the application process. These will be detailed in a Credit Proposal Disclosure Document that we will provide to you before applying for finance.

We may receive commissions from the finance provider that provides your loan or lease. These are not fees payable by you. Further details of the commission earned by us will be provided in the Credit Proposal Disclosure Document that we will provide to you before applying for finance.

We may receive between 0.33% and 1.65% of the initial loan balance and between 0.15% and 0.20% on the outstanding loan balance each year.

Innate Wealth has a number of referral arrangements that can assist you with credit services. There will be fees and charges that would be applicable to services provided by those credit providers. Innate Wealth may receive up to 20% upfront and ongoing commission of any finance contract for referrals to those credit providers.

Do we accept soft dollar benefits from providers?

Innate Wealth neither accepts nor receives any soft dollar benefits. By refusing such benefits it ensures that our personal advice is never compromised by external influences.

Do any relationships or associations exist which might influence the financial advice we provide?

Innate Wealth is not aligned to any Bank, Financial Institution, Life insurance company or Industry Superannuation fund. As such, this ensures that we do not have any relationships or associations which can/could influence the financial advice that we provide.

All recommendations made to you and detailed within your Statement of Advice are selected purely on our independent research.

Will anyone be paid for referring me to you?

From time to time, Innate Wealth may receive referrals from existing clients and other professionals.

These referrals are important to Innate Wealth as they help to build our business. If you have been referred to us by another party, we may pay that party a referral fee. The amount and details of the referring party will be disclosed to you in your Statement of Advice.

4. Our Advisers

Your adviser is an Authorised Representative of Innate Wealth and Innate Wealth is responsible for the financial services provided by its representatives and the distribution of this Financial Services Guide (FSG). Your adviser is under an obligation to act in your best interests in relation to any personal advice provided to you (known as the 'best interests duty').

As employees, advisers are paid a salary and superannuation. Upon meeting professional, behaviour and compliance standards they may also receive additional benefits that may be in the form of further payments, such as bonus payments.

If you decide to obtain personal advice, your SOA or ROA includes a calculation of the amount of advice fees or other payments your Adviser may receive.

Authorised representatives that are directors may share in the profits of Innate Wealth Pty Ltd.

Our advisory team includes:

Luke Eres: Director - Principal Adviser

- SMSF Specialist Advisor™
- CERTIFIED FINANCIAL PLANNER® professional
- Diploma of Financial Planning
- Bachelor of Social Science - Major Economics and Industrial Law
- 24 Years Advisory Experience
- Superannuation and Retirement Planning Specialist
- Authorised Representative Number 230831
- Authorised Credit Representative Number 400501

Mirko Cugura: Director - Principal Adviser

- SMSF Specialist Advisor™
- CERTIFIED FINANCIAL PLANNER® professional
- Certified Investment Management Analyst®
- Graduate Diploma in Financial Planning ASIA
- Bachelor of Economics
- F Fin – Fellow of Financial Services Institute of Australasia
- Postgraduate Diploma of Econometrics
- Certificate IV in Finance and Mortgage Broking
- 20 Years Advisory Experience
- Superannuation and Retirement Planning Specialist
- Authorised Representative Number 230833
- Authorised Credit Representative Number 400503

Shane Nicholas: Director - Principal Adviser

- CERTIFIED FINANCIAL PLANNER® professional
- SMSF Specialist Advisor™
- Bachelor of Business (Financial Planning) with distinction
- 18 Years Advisory Experience
- Aged Care Specialist
- Authorised Representative Number 260900

Luke Axton: Director – Principal Accountant

- Bachelor of Business – Major in Accounting, Minor in Economics Finance
- Chartered Accountant
- Certificate IV Finance and Mortgage Broking
- ASIC Tier 1 RG146 - SMSF Accountants Exemption
- 8 years Industry Experience

Timothy Dawe: Director - Adviser

- Bachelor of Commerce – Major in Finance, Financial Planning & Management
- CERTIFIED FINANCIAL PLANNER® professional
- LRS® Life Risk Specialist
- Certificate IV in Finance and Mortgage Broking
- 11 Years Industry Experience, 5 Years Advisory Experience
- Authorised Representative Number 410551

Innate Portfolios Pty Ltd

- Corporate Authorised Representative Number 1000528

Innate Finance Pty Ltd

- Credit Representative Number 484892

5. Our Process

Will you provide me with advice, which is suitable to my needs and financial circumstances?

The advice provided to you by Innate Wealth, should complement your lifestyle and financial objectives. In order to do this, your Financial Planner needs to have a clear understanding of what your individual objectives, financial situation and needs are before any services and products are recommended to you.

If you choose not to provide your adviser with this information, any advice they provide may not be appropriate to your needs. Our Financial Planning team is specifically trained to help you articulate the information that they require to provide you with appropriate advice.

Whilst you do retain the right not to divulge certain information to your Financial Planner, we are obliged to advise you of the potential risks you face in failing to do so.

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

When presenting your tailored Statement of Advice, your Financial Planner will clearly explain why a particular strategy has been pursued and outline all potential risks that could undermine the recommended approach. We would strongly encourage you to ask as many questions as possible, because the better you understand the strategy; the better we believe the outcome will be.

How can I provide my Financial Planner with instructions?

You can provide your Financial Planner with specific instructions in person, by letter, email, telephone, fax or other means (as agreed with your Financial Planner)

How do we maintain information about you?

National Privacy Principles apply to the collection of personal or sensitive information. In effect, this means that information provided by you in the course of receiving financial planning services must be used only for the following purposes:

- to provide you with information, products or services that you might reasonably expect or request;
- to fully understand or anticipate your needs during our relationship;
- to manage rights and obligations under any laws applying to the services provided.

The type of information which will usually be requested will include significant details about your financial, taxation, health, employment and estate planning matters. This may include details relating to your partner or family members.

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

You are entitled to request access to your file for the purpose of reviewing and correcting the information held. However, you cannot access information where it would have an unreasonable impact upon the privacy of another person, or if the information is relevant to legal obligations or legal proceedings.

We will, from time to time, disclose information about you to our Authorised Representatives and to other professionals, insurance providers, superannuation trustees, government agencies, product issuers and other service providers in connection with providing our services to you.

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.

You are entitled to obtain access to the information which we hold about you by contacting our Privacy Officer on (03) 9999 4100 or by writing to:

Privacy Officer
Innate Wealth
PO Box 380
KEILOR VIC 3036

For more information regarding our collection, use, storage and disclosure of your personal information, our Privacy Policy can be accessed on our website www.ifsg.com.au

How can you access Innate Wealth's complaints handling arrangements?

Innate Wealth and your Financial Adviser is member of the Australian Financial Complaints Authority (AFCA).

If you have a complaint regarding the provision of financial services or credit assistance services, you should take the following action:

1. Speak to your Financial Adviser about your concerns, or
2. Contact us on (03) 9999 4100 and ask to speak to our compliance manager.
3. If after speaking to your Financial Adviser or our compliance manager, your complaint is not resolved within three (3) days, please put your complaint in writing and send it to us, addressed to:

Compliance Manager
Innate Wealth
P.O. Box 380
Keilor Vic 3036

Whilst every endeavour will be made to resolve the matter promptly and impartially, if you are not satisfied with how your complaint is dealt with, you can elect to refer the matter, free of charge to the Australian Financial Complaints Authority (AFCA). The AFCA can be contacted on 1800 931 678 or emailed at info@afc.org.au. You can visit their website at www.afc.org.au.

You can also write to them at:

Australian Financial Complaints Authority (AFCA)
GPO Box 3
Melbourne VIC 3001

If your concerns involve your Financial Planner's conduct, you may wish to raise this with the Financial Planning Association of Australia (FPA). You can write to them at:

Financial Planning Association
P.O. Box 109 Collins Street West
Melbourne Vic 8007

Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on free-call 1300 300 630 or visit the website www.asic.gov.au

Professional Indemnity Insurance

Innate Wealth Pty Ltd and your Financial Planner maintain professional indemnity (PI) insurance policies. These insurances cover advice, actions and recommendations which have been authorised by Innate Wealth to be provided by your Financial Planner. These arrangements satisfy the requirements imposed by the Corporations Act 2001 and financial services regulations.

Innate Wealth Pty Ltd has Professional Indemnity Insurance in place to cover us and our representatives for liability arising from the financial services we provide. This includes claims relating to the conduct of representatives who no longer work for Innate Wealth Pty Ltd, but did so at the time of relevant conduct. We understand it is adequate to meet our requirements as a financial services licensee.