



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 24.0
Date: 03 October 2022

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") complies with Section 923A of the Corporations Act.

Innate Wealth provides independent advice because we refund any commissions received, do not accept incentives of any kind, do not have any ownership or influence by any financial institution, and do not have a restricted product list.

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
19-23 Arabin Street
Keilor Victoria 3036
Tel No: (03) 9999 4100
Email: admin@ifsg.com.au
Website: www.ifsg.com.au
ABN: 66082986641

Innate Wealth also has an office in Kew where Authorised Representatives conduct appointments from. Innate Wealth appoints Authorised Representatives 'Your Adviser' 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 that advice;
- Provide information about our remuneration and other potential benefits; 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.

A Fee Disclosure Statement ('FDS') will be issued to you where you enter into an Ongoing Fee Arrangement with your Adviser for a period greater than 12 months. The FDS will contain information about the services you were entitled to receive, the services you actually received and the fees you paid during the period. The FDS will be provided to you annually.

Where we provide you with credit services, your adviser will conduct an 'unsuitability assessment' to determine whether the credit contract recommended 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’.

Innate Wealth’s Approved Product List includes a large range of investment and insurance products for which the appropriate research and analysis has been undertaken and is not restricted in any way.

If you have an existing product that is not on the Innate Wealth Approved Product List, the investment committee will research that product to ensure your adviser can provide suitable advice to you.

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.

How will I pay for the service?

Innate Wealth operates on a fee for service basis.

For administrative assistance we charge \$220 per professional hour and for financial advice we charge \$440 per professional hour.

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In all instances, we will quote a fee, prior to undertaking any work on your behalf. This fee will be either be fixed in nature or a best estimate subject to the type of work involved.

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.

Specifically, Innate Wealth will provide our service via either one of the following forms of engagement:

1. Situational Advice

Innate Wealth will prepare a one-off Statement of Advice to meet the specific requirements you have at a point in time.

The fee for this service ranges from \$4,400 to \$6,600 (GST Inc), however this fee may vary according to the intricacy and complexity of the advice required and will be mutually agreed by you and your adviser prior to preparation of the advice.

2. Strategic Partner Program

Innate Wealth provides a strategic partner program where we actively engage with you over an agreed timeframe of between 6 and 12 months. During this time, we will prepare a series of Statement of Advice documents to meet your stated requirements.

The fee for this service ranges from \$8,800 to \$13,200 (GST Inc), however this fee may vary according to the intricacy and complexity of the advice required and will be mutually agreed by you and your adviser prior to commencement of the service.

Ongoing Advice

Depending on your stated requirements you may elect to engage your adviser on an ongoing basis. The ongoing service, which is annually based, will cover three key areas:

1. What Really Matters:

You will have ongoing access to your advisor and the broader Innate Wealth Team. This ensures that your wealth management requirements are proactively managed and that your needs are addressed in a timely manner.

2. What Needs to Happen:

Occurring annually, your adviser will conduct a strategic review tracking where you are now relative to your stated objectives and identifying opportunities that should be considered. Examples may include goal tracking, cashflow considerations, contingency requirements and wealth transfer.

3. Portfolio Management

We provide active portfolio management, aligning your asset allocation with your agreed risk profile and prevailing objectives.

If you choose to engage your adviser on an ongoing basis, you will be provided with an “Ongoing Fee Arrangement” outlining the specific services to meet your requirements.

This will be an annual occurrence, noting that you are free terminate this arrangement at any time.

You, will be required to sign this agreement and provide written consent for your adviser to deduct fees from your chosen investment or bank account.

The fee for the ongoing service considers the level of service required, the amount of capital you would like us to manage and the value you expect to receive. The minimum fee for this type of arrangement is \$3,850 per annum (GST Inc) and it can increase to \$27,500 per annum (GST Inc) subject to the level of complexity involved.

On your service anniversary date (12 months from the commencement of your annual service) your adviser will provide you with a Fee Disclosure Statement outlining what services you were expecting to receive and the services that were actually provided. In addition, you will be given the option to re-engage your adviser and provide consent for your adviser to deduct fees for the following 12 months.

Our Managed Discretionary Account (MDA) Service

Innate Wealth offers a Managed Discretionary Account service (MDA service) where you allow us to manage your investments for you within an agreed mandate you provide us, we call this the rule book. Within the parameters of the mandate we are able to use our discretion to make changes/transactions on your behalf, without obtaining your instructions.

You retain a beneficial entitlement to the investments held on the administrative platform, which provide the custodial and administrative functions associated with the MDA service. Please note, these platform facilities do not authorise us to open new accounts, withdraw funds, or contribute new funds to your investment.

Innate Wealth selects the administrative platform service provider based on criteria including: an assessment of the ultimate parent company of which the provider is a subsidiary, including whether it is a listed entity; the provider must hold an appropriate Australian regulated licence; and the provider must prepare annual audited financial statements.

The administrative service provider we currently utilise for our managed discretionary account service is:

- Xplore Wealth

Our MDA services are not available if you intend to invest your assets in non-limited recourse products such as a margin loan.

Further information on our MDA services:

What are the significant risks associated with using an MDA service?

An MDA service is not suitable for all clients. If you wish to retain control of all investment decisions an MDA service will not be appropriate for you. However, if you understand the risks associated with having someone else making decisions on your behalf then it may be suitable for you.

By authorising us to make changes to your investments without seeking your prior authority, you cannot claim we were not acting on your behalf. Provided we act within that authorisation, our acts become binding on you. Therefore, it is important you understand what we are authorised to do and carefully read and understand the activities that you are authorising us to perform on your behalf.

How can I give you instructions on how to exercise rights relating to the financial products in my portfolio?

Generally, the financial products which we invest in, on your behalf, do not have any additional rights or entitlements attached to them. However, if there are, we will let you know within the necessary timeframe and you can provide us with instructions as to how you wish for us to proceed, in writing, by email or telephone. Under an MDA you may agree for us to respond on your behalf.

Do I have to enter into a contract for you to provide MDA services?

Yes. To receive MDA services you must first enter into an MDA Contract with Innate Wealth. This contract will set out the terms and conditions of the authority and also the investment program, which sets out how your money will be invested.

Who prepares the investment program?

Innate Wealth will prepare the investment program for you based on your relevant personal circumstances, financial objectives and needs.

Will the investment program in the MDA Contract comply with the law?

The MDA Contract will include an investment program that is prepared in accordance with the requirements in Division 3 of Part 7.7 and Division 2 of Part 7.9 of the Corporations Act, and the investment program will also contain the following information:

- The nature and scope of the discretions we will be authorised and required to exercise.
- Any investment strategy that is to be applied in exercising those discretions.
- Any significant risks associated with the MDA Contract.
- The basis on which we consider the MDA Contract to be suitable for you.
- Warnings that the MDA Contract may not be suitable for you, if you have provided us with limited or inaccurate information relating to your relevant personal circumstances, and it may cease to be suitable for you if your relevant personal circumstances change.

Who is responsible for reviewing the investment program?

Innate Wealth is responsible for reviewing your investment program. We will review your investment program at least every 12 months.

Do we outsource any services relevant to my portfolio?

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We outsource services relevant to your portfolio. We do not provide custodial or depository services. Either you will hold the investments in the portfolio, or the custodian nominated for the regulated platform, Xplore Wealth, will hold them for you.

The services we outsource to the regulated platform are:

- Custodial: holding investments beneficially owned by clients.
- Transactional: buying and selling managed funds and/or direct shares using cash held in the platform cash account for clients.
- Administrative: reporting functions in relation the above holdings including the cash account, transaction reporting, taxation reporting, performance reporting and financial reporting.
- Adviser access: maintaining 24 hour per day, seven days per week, website access to clients' accounts.
- Client access: access to the above reporting via the platform website, by email or mail, on a quarterly, semi-annual or annual basis.

The entities that will be performing the above services are:

- Xplore Wealth
- Evans and Partners

We monitor the performance of the platform service providers outsourced functions by:

- Accessing their systems via internet to manage clients' MDAs and determine they are functioning in accordance with the Product Disclosure Statement (PDS);
- Calling their support services to determine the platform can resolve queries and provide additional information when requested in a timely manner and which is accurate and complete; and
- Reviewing whether there are any changes to its ownership, production of annual financial statements and preparation of client reporting as described in the PDS.

Is there a cost for the MDA Contract or the MDA service?

If we recommend you an MDA service we will charge you either a portfolio management fee or adviser service fee, these fees and costs will be provided to you at the time we provide you with personal advice.

The portfolio management fee is paid as 0.7875%, of which 0.525% including GST (less tax credits are paid to Innate Wealth as an adviser services fee) and the balance is paid as an admin fee to Xplore Wealth. For example, if you invest \$100,000 via our MDA service, of the \$787.50 fee, Innate Wealth will receive \$525 incl GST and Xplore Wealth will receive \$262.50. The fee paid to Innate Wealth is included as part of our Terms of Engagement and will be disclosed to you annually within your Fee Disclosure Statement.

Wealth Protection

If you purchase or retain a life insurance policy on our recommendation, Innate Wealth will elect not to receive a commission. This will generally result in the premium for your policy to be reduced. In the event that a commission cannot be turned off, typically for older style insurance products, we may receive a commission of up to 130% of your upfront premium and up to 88% of the annual premium you pay. If

we do, we will rebate this amount back to you at the end of the nearest quarter in which the commission payment is made. Importantly, your adviser will notify you in advance if this is to occur.

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.

Innate Wealth does not receive or accept any commissions or referral fees in the event your adviser refers you to a lending specialist.

Do we accept soft dollar benefits or alternative remuneration from providers?

Innate Wealth neither accepts nor receives any soft dollar benefits or alternative forms of remuneration. This 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 independent.

Since we are not aligned to any financial institution, life insurance company or industry superannuation fund, our advice is free from influence and tailored to your best interest.

All recommendations made to you and detailed within your Statement of Advice are selected based on the research of our investment committee, which includes third party consultants.

To ensure your adviser can provide the most appropriate service, Innate Wealth:

- has an accounting service as part of our business which trades under the same entity. Where you are referred to an accountant that is employed by Innate Wealth, your adviser will not receive any direct remuneration or benefit. The Directors of Innate Wealth may however benefit from increased revenue to the business. Note, you are free to engage with your own preferred professionals should you so choose; and
- actively manages a number of Separately Managed Accounts (SMA) via Netwealth's Super and investment platforms that may be recommended to you if appropriate. We do not receive any

additional fees for managing the investments in the SMAs on your behalf. Our asset consultant partner, Zenith, have negotiated a fee rebate of between 0.1% and 0.2% for the investments in our SMAs which we then pass directly onto our clients.

Will anyone be paid for referring me to you?

From time to time, Innate Wealth may receive referrals from existing clients and other professionals. Innate Wealth does not pay referral fees to any client or other professional.

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.

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

Our advisory team includes:

Luke Eres: Director - Financial Adviser

- SMSF Specialist Advisor™
- CERTIFIED FINANCIAL PLANNER® professional
- Aged Care Specialist
- Superannuation and Retirement Planning Specialist
- Post Graduate Diploma of Financial Planning
- Bachelor of Social Science - Majors Economics & Law
- 26 Years Advisory Experience
- Authorised Representative Number 000230831
- Authorised Credit Representative Number 400501

Mirko Cugura: Director - Financial 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
- 24 Years Advisory Experience
- Authorised Representative Number 000230833
- Authorised Credit Representative Number 400503

Timothy Dawe: Director - Financial Adviser

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

- Authorised Representative Number 000410551

Patrick Garrett - Financial Adviser

- CERTIFIED FINANCIAL PLANNER® professional
- Bachelor of Commerce - Accounting
- Diploma in Finance and Mortgage Broking
- 12 Years Industry Experience, 4 Years Advisory Experience
- Authorised Representative Number 001275548

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.innatewealth.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

Once we have received the complaint we will investigate the complaint and respond to you within 30 days to endeavour 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:

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Australian Financial Complaints Authority Limited
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 Section 961B of 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.