

# Financial Services Guide

Version number 20.0

## The purpose of this Financial Services Guide

This Financial Services Guide (FSG) has been authorised for distribution by the authorising licensee, Count Financial Limited ABN 19 001 974 625, AFSL no. 227232 ('Count'). Count is the financial services licensee that authorises your Count financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

This is an important document designed to provide you with information to make an informed decision about whether to use the financial services that we provide.

We are one of Count's franchisees and we are authorised by Count to provide financial planning services to our clients. We act on behalf of Count which means that Count is responsible for the services outlined in this FSG.

This FSG is divided into two parts and both parts must be read in conjunction as together they form the full FSG. Part One of this FSG provides high level disclosure of the financial services provided by us as well as important information about Count whereas Part Two of this FSG is an Adviser Profile and more specifically outlines the financial services provided and products recommended by us.

### Contacting us

If you need to contact us, you can speak with your Adviser. You can contact Count using the following details:

Writing:	Count Financial Limited GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432

## Part One

Part One of this FSG provides information about:

- Count as the holder of the Australian financial services license that authorises us to provide financial services
- Relationships or associations with other entities
- Other disclosure documents you may receive
- The financial services and types of products we provide or recommend
- Collecting your personal information and providing us with instructions
- Fees or costs that may apply to you
- Remuneration that we, your Adviser or a related entity may receive, and
- What you can do if you are not happy with our services or have a complaint.

## 1. About Count Financial Limited

Count's purpose is to help Australians afford their dreams. We educate clients and help them make informed decisions about their future. So, whether you are just starting out or approaching retirement, we assist you by providing you with a financial plan which gives you greater control over your financial future.

### Count's relationship with CountPlus

CountPlus Limited ABN 111 26 990 832 owns 85% of the shares in the Licensee and Count Member Firm Pty Ltd ACN 633 983 490 owns the remaining 15% of the shares in Count. CountPlus Limited owns Total Financial Solutions Australia Limited ABN 94 003 771 579. CountPlus Limited has subsidiaries and associates that provide accounting and financial advice services. Many of the CountPlus subsidiaries and associates that provide financial advice services do so as a corporate authorised representative of Count. Total Financial Solutions Australia Limited holds an Australian Financial Services License AFSL 224954 to provide advice and deal in certain financial products.

Colonial First State Group Limited ACN 004 405 556 is a substantial shareholder in CountPlus. Colonial First State Group Limited is a wholly owned subsidiary of the Commonwealth Bank of Australia ACN 123 123 124.

## 2. Disclosure documents

You may receive the following documents when your Adviser provides financial services to you.

### Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs you will receive a SoA. The information contained in the SoA will help you make an informed decision in relation to the advice provided. It also sets out the advice, the reasons for the advice and details about any remuneration payable.

### Record of Advice (RoA)

If you were previously issued with a Count SoA, certain circumstances may allow the provision of further advice without the need for another SoA. Where this is the case, you are entitled to request a RoA within seven (7) years after the advice was provided. The RoA can be requested from your Adviser and will detail the further advice and the basis of those recommendations.

Additionally, in certain circumstances where you are provided advice on a small investment balance or strategy advice only, you may be issued with a RoA. Your Adviser is required to provide you with a copy of the RoA in this circumstance, which will outline the advice, the reason for the advice, and details about any remuneration payable.

## Product Disclosure Document (PDS)

You will receive a PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product on your request. The PDS contains information about a financial product's features, fees, benefits and risks.

### 3. Advice services and products that are available

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

#### Important information

The advice that you receive cannot be considered to be independent, impartial or unbiased because:

- there is an approved product list (APL) and an off-APL approval process that your Adviser is required to follow, as explained in section 3 of the FSG; and
- your Adviser, the firm or Count may receive (as referred to in section 5 and 6 of the FSG):
  - commissions on life insurance;
  - commissions on some other products acquired prior to 1 July 2014;
  - stamping fees paid to facilitate a capital raising;
  - remuneration calculated on the basis of the volume of business placed with product providers; and
  - one-off gifts or non-monetary benefits of less than \$300 in value per product provider per year.

#### Advice services we provide

Our licence can provide advice in the following financial products:

- Basic deposit products
- Life insurance
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Standard margin lending.

Count is registered with the Tax Practitioners Board as a Registered Tax (Financial) Adviser. Based on the information collected from you, your Adviser will consider the tax consequences that relate directly to the financial advice being provided. However, this financial advice will not include an assessment of your overall tax position. To determine how your Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or claim entitlements that arise, or could arise, under a taxation law.

#### Financial product types we recommend

Based on the advice services we are authorised in, examples of the types of products that we are able to provide advice on include:

- Savings accounts and term deposits
- Insurance (life cover, total and permanent disability cover, trauma cover, income protection and business overheads insurance)

- Treasury bonds and notes
- Managed funds and pooled investments
- Listed shares and exchange-traded funds
- Retail superannuation funds, Self-Managed Superannuation Funds and Retirement Savings Accounts, and
- Margin loans.

#### Approved products

Our specialist product research team undertakes due diligence on product providers and also use independent research providers to select a range of high-quality products worthy of recommendation to our clients.

While other products may also be suitable to your needs, your Adviser will generally only provide advice on products that are listed on the Count Approved Product List ('Count APL').

All products on the Count APL must meet our rigorous selection criteria and approval process to be listed on the Count APL.

Depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the Count APL. If this happens, any product that your Adviser may recommend needs to meet our selection criteria and approval process. The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

#### Services we are not responsible for

We are only responsible for those financial services or products offered by your Adviser in their capacity as an Authorised Representative of Count. This does not include any other services your Adviser may provide in any other capacity, including as an accountant or tax agent, such as:

- Taxation advice and services, e.g. completing tax returns
- Accounting and audit services
- Self-Managed Super Fund compliance and administration services
- Business or legal advisory services and referrals
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, solicitor's or other mortgage schemes, derivatives, general insurance or direct international share holdings, and
- Any other services not provided as a franchisee of Count.

In all your dealings with your Adviser you must satisfy yourself as to who is responsible for the advice or services provided to you. If you require further clarification, please do not hesitate to contact Count.

### 4. Your personal information and providing us with instructions

#### Collecting your information

Count and we collect personal information about you when you meet with your Adviser, request or use our products or services, email us, phone us or visit our websites. This information may include:

- your personal objectives
- details of your current financial situation, and

- other relevant information.

We may also collect information about you from others, such as service providers, agents, advisers, brokers, employers or family members.

When collecting sensitive information, such as health and lifestyle information, usually for insurance purposes, we will ask you for your consent. You do not have to disclose all of your personal information. However, without it your Adviser may not be able to provide advice that is appropriate for your objectives, financial situation or needs.

To access your personal information, please contact your Adviser. If your personal information is incorrect, we can correct it.

### **Exchanging your information**

We may exchange your personal information with CountPlus Limited and CountPlus Limited can use this information in the same way we can. We disclose information to third parties as permitted by law or for the uses listed below.

Third parties include service providers where we outsource activities, persons acting on your behalf, other financial institutions, auditors, insurers, employers and government agencies. We may disclose your information overseas to overseas Group members, service providers or other third parties who operate or hold data outside Australia, or when required for a particular transaction or by overseas law. Australian law may not apply to some of these overseas parties.

### **Using your information**

Your information may be collected, exchanged and used so that:

- advice that is appropriate for your objectives, financial situation and needs can be provided to you;
- Count and we may manage our relationship with you;
- Count and we may price, design and administer services or inform you about other products and/or services that may be of interest to you; and
- Count and we can manage our risks, help identify and investigate illegal activity, comply with our legal obligations, and assist government and law enforcement agencies.

The law requires us to establish your identity and assess applications for products and services by verifying your full name, date of birth and residential address and to do so, we need to sight and maintain records of various identification documents, such as a drivers licence or passport.

Your Adviser may sometimes use programs, calculators or worksheets as illustrative tools when you meet with them. Your Adviser uses these tools to find out about your relevant objectives, financial situation or needs. You should not rely or act on any representations made in these meetings as any personal advice that you receive will be set out in your SoA.

### **How we handle your personal information**

Count and we are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality Count has adopted the principles set out in the Privacy Act 1988. For further details you can refer to

CountPlus Limited's Privacy Policy which is available at <https://www.countplus.au/privacy-policy/>.

We may share your information with other members of CountPlus. We may also share your information with others for other reasons mentioned in CountPlus Limited's Privacy Policy. Please refer to CountPlus Limited's Privacy Policy for more information around why your information may be shared and who we may share it with. If you wish to review your personal information held by Count, please contact us by phoning 1300 650 432 or emailing [privacy@count.com.au](mailto:privacy@count.com.au).

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act 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 licence. We will also retain copies of this information. We assure you that this information will be held securely. We cannot provide you with services if you are unwilling to provide this information.

### **Instructing your Adviser**

You will generally need to instruct your Adviser in person and your signature will be required for verification. For some products and services though, special arrangements can be put in place to instruct your Adviser by electronic means, for example phone, e-mail or fax.

### **Non-advisory transactions**

At times you may wish to make an investment transaction and do not need assistance from us with any decisions in relation to the product or transaction. In these cases, we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without advice from us, we will ask you to confirm your instructions in writing and sign an acknowledgment form. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

### **5. Fees, commissions, payments and other benefits we or Count may receive for our services**

All advice fees and commissions are required to be paid directly to Count as the licensee. Count may retain a percentage and the balance that is attributable to the financial services we provide is passed on to us.

If the fees, commissions or 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.

### **Financial planning advice fees**

The fees or other costs that we may charge for services provided or products recommended, depends on the nature and complexity of your situation and the advice that is provided.

Your Adviser will agree with you the form and amount of charges before they provide any advice or services. The general way you pay for our services is through our financial planning advice fees.

The methods are explained below, and the actual costs, will be disclosed in our advice to you or in the acknowledgment

form completed when a transaction is requested. You have the right to request further information in relation to the remuneration, the range of amounts or rates of remuneration that we or your Adviser may receive. The fees and charges for our advice and service may be based on a dollar amount, a percentage of the amount invested, an hourly rate, or any combination of these.

Where we are aware that you have used borrowed funds to invest through us, we will charge you a flat dollar advice fee.

Our financial planning advice fees generally include charges for providing you with a SoA, RoA, ongoing advice and services, or it can be for other fees, such as a fee for a transaction. You may choose to pay these fees directly or from the product(s).

Please refer to Part Two of this FSG for further details on fees that we charge.

### **Commission payments**

When you invest in a product or commence an insurance policy through us, we may receive initial or ongoing commission payments from product providers.

An initial commission is a one-off payment made upon entry to a financial product and an ongoing commission is paid each year for which a financial product is maintained. These commissions are based on a percentage of the funds you invest, or the premiums you pay. They are not paid directly by you and are instead deducted from the investment, superannuation, loan or insurance premium by the product provider. We only receive commission where we are entitled to receive these payments through existing arrangements with product providers.

If you are charged a direct fee, we may rebate some or all of the above commission to you.

### **Investment, superannuation and loan products**

The initial commission we receive on an investment, superannuation or loan product may be up to 4.40% of the investment amount. The ongoing commission we receive may be up to 1.50% per annum.

We will only receive commission payments on investments, superannuation or loan products, or additional contributions or drawdowns to these products, where we are entitled to.

### **Life insurance products**

#### **Additional cover added to an existing product which was issued before 1 January 2018**

The initial commission we receive on insurance products may be up to 124% of the first year's premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

#### **Additional cover added to an existing product which was issued after 1 January 2018 and before 1 January 2020**

Where additional cover is added on or after 1 January 2019 and before 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that Count will receive will be no more than 77% of the increase in premium. The ongoing commission that Count can receive will not exceed

22% p.a. of the premium (33% p.a. of the premium for level commission structures).

#### **Additional cover added to an existing product after 1 January 2020**

Where additional cover is added on or after 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that Count will receive will be no more than 66% of the increase in premium. The ongoing commission that Count can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

#### **New products issued on or after 1 January 2020**

The initial commission that Count may receive on insurance products applied for and issued on or after 1 January 2020 will be no more than 66% of the premium in the year of issue. The ongoing commission that Count can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

### **Referral fees**

If you have been referred to your Adviser or us by a third party, Count or the Adviser's firm may also receive a benefit for referring you to third parties for specialist services. These benefits are not passed on to your Adviser.

- Class Super is Count's preferred third-party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count receives 17.5% of the annual software licence fee.
- SUPERCentral is Count's preferred third-party service provider for preparing trust deeds. In situations where you utilise their services, Count receives between 25% and 46% of revenues that SUPERCentral receives as a result of the referral.
- Count also has a referral arrangement in place with Townsends Business and Corporate Lawyers (Townsends). If you use the services of this provider as a result of a referral from us, Count will receive up to 10% of the invoice payable by you to Townsends and this is not an additional cost to you.
- For Wealth Insurance recommendations we have a referral arrangement in place with Total Financial Solutions Australia Limited ABN 94 003 711 579, AFSL 224954 (TFS). Count will be entitled to 12.5% of the yearly commissions paid by the insurance provider to TFS in the first and subsequent years that you hold the policy. The remaining 87.5% of the yearly commission is split between TFS and the franchise at 62.5% and 25% respectively.

If applicable, further details will be disclosed in Part Two of this FSG at 'Referral Arrangements' and in your SoA.

### **Count Member Firm Trust**

Your Adviser is employed by a franchise of Count Financial and may also be a shareholder in the franchise. This franchise may be a beneficiary under a discretionary trust in which Count Member Firm DT Pty Ltd holds the assets as trustee for that trust. These assets are all of the shares in Count Member Firm Pty Ltd. Count Member Firm Pty Ltd

owns 15% of Count Financial. Whether a benefit is received by the franchise will be determined by the franchise satisfying certain key indicators which may include financial and compliance standards.

### Product Provider Payments

Count may receive payments from product providers on a monthly or quarterly basis each year. For investment products these payments are based on the average balance

of funds placed by all Count Advisers in each relevant product provider's investment option(s). Count will continue to receive payments where they have an entitlement to do so under an agreement with product providers prior to 1 July 2013.

For insurance products these payments are based on the value of insurance placed by all Count Advisers either on the relevant product providers' platform or in insurance products offered by the provider. The payments received are based on a number of factors including the date that the policy was issued (only policies issued before 31 December 2017 are eligible to be included) and the level of policy lapses/cancellation.

### Incentive payments

#### Fee rebate or waiver

Count, your Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees are for the provision of support services provided by Count to the franchisee and include such items as annual membership fees, software and data service fees, Paraplanning fees and the travel and accommodation costs associated for attending conferences and training events.

### Other benefits we may receive

#### Alternative remuneration

For Morningstar managed portfolios, a fee equivalent to 0.2% p.a. of your portfolio value is charged by Count for the ongoing review of the managed portfolios, and oversight of the investment policy and investment program with respect to the managed portfolio investment options.

From time to time, Count, your Adviser and/or we may also receive other benefits from product providers. If other benefits are received, they can only be valued at less than \$300 per provider each year or will otherwise be declined.

Count, your Adviser and/or we maintain a public register of all other benefits we receive, regardless of whether they are accepted or declined. We also maintain a conflicts of interest register.

Conflicts of interests are circumstances where some or all your interests are inconsistent with, or diverge from, some or all of Count, your Adviser and/or our interests. If you would like to see a copy of these registers, you can speak with your Adviser or contact us.

### Professional Development Conference Sponsorship

Count may receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help us to offset the organisational and running costs of providing education and training services for our Advisers.

### Safeguards Adopted

Count has adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These include

- providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- referring you to another adviser within our Group to provide advice to you, and
- declining or withdrawing the services provided to you.

We believe these safeguards are a sound and effective means for controlling and avoiding conflicts of interest. Where we have identified a conflict of interest, we will act as a reasonable advice provider without a conflict would do, including providing advice that is in the client's best interests.

### 6. Complaints, privacy and compensation arrangements

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

#### What to do if you have a complaint

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice for whatever reason, you should take the following steps:

#### Step 1: Contact your Adviser

If you have a complaint or are not satisfied with the advice or services provided to you, you should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

#### Step 2: Complaints Manager

If your complaint has not been resolved to your satisfaction, you can contact our Complaint Resolution Manager by:

Writing:	Complaint Resolution Manager Count Financial Limited Level 8, 1 Chifley Square Sydney NSW 2000
Emailing:	reportcomplaints@count.com.au
Phone:	1300 650 432

### **Step 3: Australian Financial Complaints Authority (AFCA)**

If you're not satisfied with our handling of your complaint or our decision, you may refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA offers a free independent dispute resolution service for consumer and small business complaints.

Writing:	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
Online:	<a href="http://www.afca.org.au">www.afca.org.au</a>
Phone:	1800 931 678 (free call)
Email:	<a href="mailto:info@afca.org.au">info@afca.org.au</a>

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

If your concerns involve unethical conduct, you may wish to consider raising these concerns with the Financial Planning

Association of Australia (FPA). They can be contacted at GPO Box 4285 Sydney NSW 2001.

#### **Our compensation arrangements**

We have professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

Our professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on our behalf.

**Count Financial Limited Head Office  
Level 8, 1 Chifley Square  
Sydney NSW 2000  
Phone: 1300 650 432**

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