



Financial Services Guide

Bluewater Financial Advisers Pty Ltd

Date: 21 October 2019

AFS Licence no: 411846

About this document

This Financial Services Guide (FSG) is an important document, in two parts, that we encourage you to read before engaging us or making any financial decision.

Part One introduces the Licensee, Blue Water Financial Advisers Pty Ltd ('Bluewater', 'we', or 'us'). After reading Part One, you'll understand:

- Who we are and how we can be contacted;
- What financial services and financial products we are authorized to provide to you;
- How we, our advisers and any other relevant parties are remunerated;
- Any relationships, arrangements or associations that may create conflicts between our duties to you and our own interests; and
- Details of our internal and external dispute resolution procedures and how you can access them.

In addition, Part Two is the Adviser Profile. This part includes information on your adviser, their background and the services they are authorized to provide on our behalf.

PART ONE

About Bluewater

Bluewater Financial Advisers Pty Ltd is a privately owned and operated Australian company. We are not owned or associated with any Bank, Insurer or Funds Management business.

We are a Principal Member of the Association of Independently Owned Financial Professionals (AIOFP), an Affiliate Member of the Association of Financial Advisers (AFA) and The Tax Institute.

You can contact us by:

- Speaking to your nominated representative
- Calling us on 1300 799 101
- Visiting our website at <https://www.bluewaterfg.com.au/>

- Writing to us at:

Bluewater Financial Group
Level 57 MLC Centre
19-29 Martin Place
Sydney NSW 2000

Our financial services

Bluewater holds its own Australian Financial Services Licence (AFSL) and is licensed to:

- Provide financial product advice to retail and wholesale clients; and
- Deal in financial products by applying for, acquiring or disposing of a financial product on behalf of others.

These services may be provided in relation to a range of financial products including:

- Basic deposit products
- Other deposit products
- Non-cash payment products
- General insurance products
- Life products
- Government debentures, stocks or bonds
- Interests in managed investments schemes including investor directed portfolio services (IDPS)
- Securities
- Retirement savings accounts (RSA)
- Superannuation
- Self-Managed Super Funds (SMSF)
- Standard margin lending facilities

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Personal advice

Before we can give you advice, which is appropriate and in your best interests, you will need to give us details of your personal objectives, current financial situation, needs and any other relevant information. You can choose not to provide us with this information, but any advice we give you will be general in nature and may not be appropriate to your objectives, financial situation and needs. If you are a retail client, you should read the warnings contained in the SoA carefully before making any decisions relating to a financial product.

If we give you personal advice, we will maintain a record of your personal profile, including details of your objectives, financial situation and needs. We will also maintain records of any recommendation made to you. For information on how to access personal information about you, please refer to the section 'Your Privacy' below.

We will only give personal advice to you if you secure the services of one of our representatives.

Other documents you might receive

Statement of Advice (SoA)

Unless you're a Professional Investor, Sophisticated or Wholesale Client any financial advice we provide to you will be confirmed in writing in either a Statement of Advice (SoA) or a Record of Advice (RoA).

In these cases, unless we warn you otherwise, our advice will consider your personal circumstances, needs and goals. You should read the SoA or RoA carefully, to ensure that you fully understand any recommendations we make. Do not implement our advice unless you do.

Record of Advice (RoA)

In some cases, where we are providing supplementary recommendations consistent with the basis of our previous advice, we'll prepare a Record of Advice to document the advice and services we provided. We will retain the RoA for seven years and you can request a copy of the RoA, for free, at any time within this period.

Product Disclosure Statement (PDS)

A PDS is a document (or group of documents) that describes a financial product. A PDS (or other offer document) contains important information to assist you to make a decision about the product it describes. You should receive and review the PDS (or other offer document) provided by us before you make an investment decision about our products, or a product we recommend.

How you can give us instructions

You can usually give us instructions by telephone, mail, email, fax or via our website. There may be special instruction arrangements for some financial products and financial services – details of which will be explained in the relevant PDS (or other offer document).

Unless you request otherwise, the email address you provide to Bluewater or any other Representative of Bluewater, may be used to provide notifications, information and important documents (including a FSG, PDS and SoA) about your account and/or financial products and/or services offered by Bluewater. If you do not want to receive information via electronic methods, please contact us.

What Bluewater may charge you

Initial consultation is complimentary

Advice preparation or establishment fees

The advice preparation fee or establishment fee will depend upon the complexity of the advice being provided. The minimum fee charged is \$550. The maximum fee may be up to 5.5% of the value of your assets.

Ongoing fee for advice:

If you elect to pay a fee for the ongoing review of your financial planning strategy, the fee is based upon the complexity of ongoing advice and the services provided. The minimum fee charged is \$550 p.a. The maximum fee may be up to 1.1% of your assets under management.

Ad-hoc advice:

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

All fees disclosed are inclusive of GST.

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How you can pay for our services

We offer a range of payment options. All fees and/or commissions charged will be fully detailed in any advice document you receive. You can pay in the following ways:

- A fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a financial product provider when you commence an insurance contract, or
- A combination of the above.

This allows you to know that you are paying for our advice irrespective of any product we recommend and clarifies the services you are entitled to and ensures all recommendations are driven by your needs.

What monetary benefits are paid to us by product issuers or others?

Product/Service	Frequency of monetary benefits paid to us	Monetary benefit we may receive
Margin Loans	Nil	Nil
Insurance Products	Upfront Ongoing	Between 0% and 88% Between 0% and 33% of the annual premium for as long as you hold the product.
Pre-existing arrangements	Upfront Ongoing	Between 0% and 5.5% Between 0% and 0.88% of the value of your investments for as long as you hold the product.

How will my adviser be paid for the services provided?

All fees and commissions received for the services provided are made to Bluewater and then paid to the Corporate Authorised Representative or your adviser

If your Adviser is employed by a Corporate Authorised Representative your Adviser may be paid a salary. Employees receive salaries and may be eligible for bonus and incentive payments. They may also receive profit share from fees and commissions paid to that Corporate Authorised Representative.

Referral fees and commissions

Should your circumstances require it, and if it is in your best interests, we may refer you to another party to obtain advice and services that we cannot provide.

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 products involved.

We will disclose the referral arrangements to you whenever we refer you to an external party.

In some situations, we pay referral fees or commissions to external parties who have referred you to us. We will disclose the referral arrangements to you when we provide you with a SoA.

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Your Privacy

At Bluewater, the privacy of your personal information is important to us. Any personal information collected will be handled in accordance with our Privacy Policy.

To provide you with our services, we maintain a record of the information you provide to us, including your personal profiles and details of your objectives, financial situation and needs, as applicable. We will also maintain records of any recommendation made to you, as applicable.

Our Privacy Policy details how we handle your personal information. A copy of that policy, as amended from time to time can be obtained by visiting the Bluewater website at www.bluewaterfg.com.au

Compensation Arrangements

Bluewater has a Professional Indemnity Insurance Policy in place which satisfies the regulatory requirements for compensations arrangements under section 912B of the *Corporations Act 2001 (Cth)*.

Subject to the terms and conditions, the Policy provides cover for civil liability resulting from third party claims concerning the professional services provided by Bluewater, its employees and representatives.

The insurance arrangement continues to provide coverage for past employees and representatives in respect of professional services performed while engaged by Bluewater.

How we handle complaints

We are committed to providing you with quality advice. If you are unhappy with our services, we would like you to tell us about it and let us know how you think we can fix it.

If you have a complaint about the service provided to you, you should:

- Contact your adviser
- Contact us at our office on 1300 799 101

Alternatively, if you prefer to submit a written complaint, please do so to:

The Complaints Officer

GPO Box 4523

Sydney NSW 2000

Email: info@bluewaterfinancial.com.au

We will assess your complaint and advise you of the outcome, either by telephone or in writing.

If any issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides and independent financial services complaint resolutions that is free to consumers.

You may lodge a complaint with AFCA if:

- Your complaint relates to a Bluewater service; and
- You are not satisfied with our response after 45 days.

Bluewater is a member of AFCA. You can contact AFCA via the following, quoting membership number 28547:

Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001

Tel: 1800 931 678 (free call)

Email: info@afca.org.au

Website: www.afca.org.au

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What areas can I advise you on?

I am authorised by Bluewater to provide you advice or services in the following areas:

- Deposit and Payment products
- Government debentures, stocks or bonds
- Life investment and life risk products
- Managed investment schemes including investor directed portfolio services
- Retirement savings account products
- Securities (e.g. shares)
- Superannuation
- Margin Lending

How you can give me instructions

You may provide instructions to me by using any of the contact details provided in the 'My contact details' section.

Fees and Charges

All fees and commissions disclosed in this FSG which are attributed to the services provided to you by me are paid to Bluewater.

"Bluewater receives a flat weekly licensing fee in exchange for providing authorisation for me to operate under their Australian Financial Services License 411846. After the deduction of the licensing fee, I receive 100% of the fees disclosed for the advice provided. The advisory fees received pay for normal commercial expenses inclusive of licensing, office accommodation, telephones, car, etc"

.Financial advisers fee structure

As part of detailed financial planning, there are costs to you at various stages of the process. Before making any recommendations, I will discuss and agree the fees with you. Advice fees are inclusive of GST and payable by you at the following stages:

1. Advice preparation or establishment fees

The advice preparation fee or establishment fee will depend upon the complexity of the advice being provided. The minimum fee charged is \$550. The maximum fee may be up to 5.5% of the value of your assets.

PART TWO

Your financial adviser

Your financial adviser is Mitchell Johnston.

In this part of the FSG, the terms 'I', 'me', 'we' and 'our' refer to Mitchell Johnston. The term "Representatives" refers generally to Bluewater financial adviser's Authorised Representatives.

My Authorised Representative number is 409848.

What qualifications and professional memberships does your financial adviser have?

Qualifications

- Advanced Diploma of Financial Services (Financial Planning)
- Diploma in Mortgage Broking Management
- Specialist Knowledge in Self-Managed Super Funds
- Specialist Knowledge of Gearing & Margin Lending
- Tax (Financial) Adviser

Professional Memberships

- Financial Planning Association (FPA)
- Mortgage & Finance Association of Australia (MFAA)
- Tax Practitioners Board (TPB)

My Associations and Relationships

I am the Managing Director and Principal Adviser of Welcome Home Financial Advice, a corporate authorised representative of Bluewater Financial Advisers.

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2. Ongoing fee for advice:

If you elect to pay a fee for the ongoing review of your financial planning strategy, the fee is based upon the complexity of ongoing advice and the services provided. The minimum fee charged is \$550 p.a. The maximum fee may be up to 1.1% of your assets under management.

3. Adhoc advice:

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

Full details of all fees and commissions for financial services will be provided to you in a Statement of Advice (SoA), or Record of Advice (RoA) and Product Disclosure Statements at the time of receiving any recommendation.

What other benefits do I receive?

In addition to the remuneration detailed in this FSG, I may receive other benefits and entitlements as detailed below:

- From time to time, we may accept alternative forms of remuneration from product providers or other parties (up to a value of \$100), such as support connected with our professional development (e.g. training sponsorship to attend conferences). We maintain a register detailing any benefit that we receive.

What will I be paid when making a referral?

I may receive a payment for making a referral to an external specialist such as an accountant, mortgage broker or solicitor. Any amount payable will be disclosed in the SoA provided to you. This will be paid by the external specialist and will be at no additional cost to you.

If you have been referred to me by an external party and you accept the services I provide, I may make a payment to the external party for that referral. Any amount payable will be disclosed in the SoA provided to you. This will be paid by me to the external party and will be no additional cost to you.

My contact details

Mitchell Johnston

Phone: 0425 368 454

Email: mitch@welcomehomeadvice.com.au

Website: www.welcomehomeadvice.com.au



CREDIT GUIDE & PRIVACY CONSENT

About Us

OUR DETAILS

Australian Credit Licence: Vow Financial Pty Ltd

Australian Credit Licence Number: 390261

ABN/ACN: 66 138 789 161

Address: L11, 1 Chifley Square, Sydney NSW 2000, Australia

Credit Representative: Mitchell Johnston

Credit Representative Number: 416378

Email: mitch@welcomehomeadvice.com.au

Business Name: Welcome Home Financial Advice

Phone Number: +61 425 368 454

ABN: 43 674 589 311

Address: 50 Churinga Ave, Mitcham VIC 3132, Australia

Credit Guide

November 2018

This is the Credit Guide of Vow Financial Pty Limited ACN 138 789 161, Australian Credit Licence 390261. We are licensed to arrange loans and leases under the National Consumer Credit Protection Act 2009 (**NCCP Act**). The NCCP Act regulates the activity of lending, leasing and finance broking.

About this Credit Guide

This Credit Guide is designed to assist you in deciding whether to use the services we offer.

Services we provide

We will provide you with information on a range of lenders and products. Once you have chosen a loan or lease that is suitable for you, we will help you to obtain an approval.

Our Associations and Relationships

All our advisers are accredited with Vow Financial Pty Limited which is a wholly owned subsidiary of Yellow Brick Road Group Limited. We source finance from a panel of lenders.

The lenders named below are the six lenders with whom we conduct the most business:

- Commonwealth Bank
- ANZ
- NAB
- Westpac
- St George
- Suncorp

Our Responsible Lending Obligations to You

We are obliged to ensure that any loan, or principal increase to a loan, we help you to obtain, or any lease we help you enter, is not unsuitable for you. To decide this, we may need to ask you some questions in order to assess whether the loan or lease is not unsuitable. The law requires us to:

- make reasonable enquiries about your requirements and objectives;
- make reasonable enquiries about your financial situation; and
- take reasonable steps to verify that financial situation.

Credit will be unsuitable for you if, at the time of the assessment, it is likely that the following would apply at the time credit is provided:

- you could not pay or could only pay with substantial hardship; or
- the credit will not meet your requirements or objectives.

For example, if you can only repay by selling your principal place of residence, it is presumed that the loan will cause substantial hardship unless the contrary is proved. For this reason, we must ask you to provide a significant amount of information. It is important that the information you provide is accurate, complete and up-to-date.

We will provide you with a copy of our preliminary assessment of your application, if you ask within seven years of when we provided assistance to you. This requirement is only triggered if we give you credit assistance.

If we arrange a loan for you to purchase or refinance real estate, remember you must make your own enquiries about the value of the real estate and its potential for future growth. Although we may obtain a valuation, that is for our own use and you should not rely on it.

Our Fees and Charges

Generally, no fees or charges are payable by you to us for our credit assistance. In some instances, a fee for service may be required. Details of these fees will be set out in a Credit Quote.

However, you may be charged a lender's application fee, valuation fees and other fees associated with the loan. These fees are not charged by us and will be disclosed to you prior to submission of the credit application. Please note, however, that if a valuation is conducted and you ultimately choose not to proceed with the loan, you may be liable for the valuation fees.

Commissions

We may receive commissions from the lenders and lessors who provide finance for you as our customers. These fees are not payable by you. You may obtain information relating to reasonable estimates of those commissions and how they are calculated.

When we provide you with credit assistance, you may ask us for a reasonable estimate of the commission likely to be received, directly or indirectly by Vow Financial and its credit representatives.

From time to time, we may receive financial or non-financial benefits from Vow, lenders, lessors or others. Some or all of a commission received by Vow may be paid to your Credit Representatives.

Referral Commissions

Vow may pay referral commissions to our credit representatives for referring to our Diversification Partners such as Vow Conveyancing. Referral Commissions may vary between 20% and 25% of professional fees charged by the Diversification Partner. These fees are not payable by you.

Referral Fees

We may pay a referral fee (i.e. commission) for third party referrals. An example of a referrer would be a real estate agent or solicitor. This fee is not payable by you. This fee will be disclosed in the Credit Proposal Disclosure Document. You may on request obtain a reasonable estimate of the amount of commission and how it is calculated.

Vow Financial and your representative may also receive a benefit for referring you to other specialist service providers.

Our Dispute Resolution Procedures

Internal Dispute Resolution

If you are unhappy with our services, please contact us first by contacting our Complaints Manager on the following:

Vow Head Office (Complaints Manager)

Telephone (02) 8226 8327

Email complaints@vow.com.au

Post PO Box H265, Australia Square, NSW 1215

Website www.vow.com.au

We will endeavour to resolve your complaint quickly and fairly.

If your complaint has not been resolved to your satisfaction, you may contact the Australian Financial Complaints Authority (AFCA), which is an independent dispute resolution scheme for financial services complaints.

For complaints, you can contact:

Australian Financial Complaints Authority (AFCA)

Telephone 1800 931 678

Email info@afca.org.au

Post GPO Box 3

Melbourne, VIC, 3001

Website www.afca.org.au

Things you should know

You should ensure that you have approved finance, in writing from the lender, before entering a binding contract to purchase.

It is important you understand your legal obligations under the loan, and the financial consequences. If you have any concerns, you should obtain independent legal and financial advice before you enter into a loan contract.

We do not make any promises about the value or future prospects of any property you finance with us. You should always rely on your own enquiries.

Before you accept your loan offer, make sure you read the credit contract carefully to understand full details of the loan. If you have any doubts, you should obtain independent legal and financial advice before you enter into any loan contract.

We represent lenders and have obligations to them, and in particular, to not provide any information we know is misleading or deceptive. We also have obligations under the law to report any fraud, forgery, or other illegal activities. Before using our services, it is important that you understand that we have these obligations to lenders, and under the law.

Vow Financial is required to have adequate arrangements in place to ensure you are not disadvantaged by any conflict of interest.

Privacy Policy

Vow Financial Pty Limited ACN 138 789 161, Australian Credit Licence 390261 and our related businesses, authorised representatives and credit representatives ('we', 'us', 'our') are collecting personal and financial information about you.

We collect personal information to provide you with the services that you have requested, manage our relationship with you, for the purposes of assessing your application for finance and managing of that finance. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

1. The information you provide will be held by us.
2. You appoint us as your agent to act as an "access seeker" to obtain your credit information from any credit reporting body on your behalf and for the purposes of assisting you with your finance application. You authorise us to disclose any credit information we obtain to prospective financiers in connection with your finance application.
3. We may use your credit information and any other information you provide to arrange or provide finance and other services.
4. We may exchange the information with the following types of entities, some of which may be located overseas.
 - Prospective funders/ lenders, mortgage managers or other intermediaries and related parties in relation to your finance requirements;
 - Other related and unrelated organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres;
 - Anybody who represents you, such as finance brokers, financial planners, lawyers and accountants;
 - Any industry body, tribunal, court or otherwise in connection with any complaint regarding our service;
 - Where we are required to do so by law;
 - Anyone, where you have provided us with consent;
 - Your employer, referees or identity verification services;
 - Any organization providing online verification of your identity; and
 - Any person or business considering acquiring an interest in our business or assets.
5. You consent to the release of personal information relating to your investment(s) and/or insurance policies to our agents upon request.
6. You may gain access to the personal information that we hold about you by contacting us. A copy of our full privacy policy can be obtained from our website, by visiting www.vow.com.au.

Our privacy policy contains information about how you may access or seek correction of the information we hold about you, how we manage that information and our complaints process.

By signing this consent you agree that we may collect, use and disclose your information also as specified below:

- You agree that we may collect and use and disclose your information as specified above.
- Consent to provide your personal information to a Credit Reporting Body (CRB).
- We can act as your agent to obtain a report or information about you consumer or commercial credit worthiness from a CRB.
- We may disclose personal information such as your name, date of birth and address to the CRB to obtain an assessment of whether that personal information matches information held by it.

If you do not provide the information, we may be unable to assist in arranging finance or providing other services.

Declaration and Consent

Do you consent for us to send correspondence to you via email?

Yes ☐ No ☐

Do you consent to receive marketing information from us?

Yes ☐ No ☐

- I/ we declare that I am/ we are over the age of 18 and the information that we provide are true and accurate.
- I/ We have read the above information and understand the reasons for the collection of my/ our personal information and the ways in which the information may be used and disclosed and I/ we agree to that use and disclosure.
- I/ we have read and understand that the information that I/ we have provided will be shared with related and unrelated businesses as per the company's privacy policy.
- I/ We understand that the parties may cancel or refuse service(s) if information is found to be false or misleading.
- I am/ We are aware that I/ we can access my/ our personal information upon request and if necessary, correct information that I believe to be inaccurate.

I/ We understand that I/ we have read and understand the information contained within this form.

Client 1 signature

Print name of client

Date

Client 2 signature

Print name of client

Date