Count Wealth

# Financial Services Guide

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This Financial Services Guide (FSG) has been authorised for distribution by Count Financial Limited (ABN 19 001 974 625), the holder of Australian financial services (AFS) licence no. 227232 (Count, we, us). Your Financial Adviser is a representative of Count and provides financial services on Count's behalf under its AFS licence. Count is responsible for those financial services.

# Not independent

We acknowledge that we are not independent, impartial, or unbiased. In general, we provide personal advice that aligns with Count's Approved Product List (APL), which may include financial products and services that are associated with Count or its related entities. We may receive commissions for recommending life insurance products and non-monetary benefits such as training and educational seminars from product providers whose products are included on the APL and may be recommended to you.

# **The purpose** of this FSG

This document provides information to help you decide whether to acquire the financial services we are authorised to provide and the financial products those services relate to. , It outlines the types of documents you may receive, any relevant interests, relationships or associations we, or your Financial Adviser may have, how Count, your Financial Adviser and any related parties are paid for the services provided, how you can contact us, our complaint handling process and options available to you if you are dissatisfied with our services.

Please read the entire FSG to ensure you understand how we operate and the services available to you.

# About **Count**

Count is a subsidiary of Count Limited ABN 111 26 990 832 ("Count Limited"). Count Limited provides client engagement services, training, licensing, compliance, investment advice and support services to Count and your Financial Adviser. Count Limited is an Australian public company listed on the Australian Stock Exchange (ASX:CUP). Count Limited operates a network of professional accounting and financial advice firms. Count Limited also owns a number of businesses that specialise in the provision of education, expertise and services to accountants and advisers.

# **Other relationships** which might **influence the provision** of **financial services**

## DWA Managed Accounts Pty Ltd

DWA Managed Accounts Pty Ltd (AFS Licence No. 264125) (DWA) is a wholly owned subsidiary of Count Limited. DWA provides portfolio management and investment advisory services for certain managed account solutions including:

- Oracle Executive Series
- Oracle Prosperity Series
- Oracle Focus Series
- Oracle Fixed Income Managed Fund
- CARE Portfolio Series
- Count FirstChoice Managed Accounts

These managed accounts may be recommended by your Financial Adviser. DWA receives portfolio management fees for the ongoing management and maintenance of those portfolios.

None of Count Limited's owned licensees (including Count) or representatives, including your Financial Adviser receives any income, revenue or other payment from those portfolio management fees. Any fees payable by you for personal advice in relation to, or your investment in, these portfolios will be disclosed separately in your Statement of Advice (SoA). Access to invest in the products may be provided through one or more platform operators or administrators.

## Hub24 Limited

HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Count Limited.

The Hub24 platform is included on the Count APL. Count and your Financial Adviser are required to act in their clients' best interests at all times and will only recommend the use of the Hub24 platform if it is suitable for your needs.

We continue to use a range of other platforms to implement investment advice, and you are welcome to request an alternative platform if you prefer. Importantly, we are not subject to any incentives, sales targets, or under any obligation to recommend the Hub24 platform.

## Philo Capital Advisers – Managed Discretionary Account (MDA) Service

Your Financial Adviser may recommend the Managed Discretionary Account (MDA) service provided by Philo Capital Advisers Pty Ltd (Philo) (ABN 70 119 185 974, AFSL 301808). More information about Philo is available at www.philocapital.com.au.

If you use this service, Philo will be responsible for managing your investment portfolio in line with an agreed Investment Program. This program is based on your financial objectives and strategy, which your adviser will help you establish. Philo, or a portfolio manager appointed by them, will make and implement investment decisions to keep your portfolio aligned with your agreed strategy. Your Financial Adviser does not operate the MDA. Their role is to provide you with personal advice and recommend the service if it is appropriate for your needs. Philo is responsible for the day-to-day management of your investments, while a platform provides custody and administration services.

Fees for the service are paid from your account and include an MDA portfolio management fee. Your Financial Adviser may also receive advice fees as agreed with you. In addition, Count may receive a governance and oversight fee of 0.05%–0.15% p.a. (excluding GST) from Philo in connection with its ongoing review and oversight of the MDA service. All fees and payments will be clearly disclosed in your Statement of Advice (SoA). You should carefully read the SoA, MDA Contract and the Investment Program before deciding to proceed.

## Safeguards to manage conflicts of interest

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

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

We consider these safeguards to be a robust and effective approach to managing and preventing conflicts of interest. If we detect a conflict of interest, we will act as an impartial advisor would in your interests.

# Documents you **may receive**

Documents may be provided electronically to your nominated email address, unless agreed otherwise. The following documents may be received by you when your Financial Adviser provides you with financial services:

## Statement of Advice (SoA)

If your Financial Adviser provides personal advice tailored to your circumstances and needs, you will receive a SoA. This document outlines the advice provided, the reasons for the advice, and any remuneration payable by you and/or received by Count. The information contained in the SoA is designed to help you make an informed decision about whether to act on the advice.

## Record of Advice (RoA)

In certain circumstances, if you have previously been issued with a SoA, your Financial Adviser may provide further advice without the need for another SoA. In these cases, a Record of Advice (RoA) will be prepared. Additionally, where advice is provided on a small investment balance, a RoA may also be issued. The RoA will outline the advice, the reasons for the advice, and details of any remuneration payable by you and/or received by Count. Your Financial Adviser will provide you with a copy of the RoA on request. A request may be made by you through the contact details outlined on this FSG.

## Product Disclosure Document (PDS)

You will receive any relevant product disclosure documents or a link to the website where you can locate the relevant disclosure documents if your Financial Adviser recommends a financial product or offers to arrange the issue of a financial product at your request. Disclosure documents contain information about a financial product's features, fees, benefits and risks.

# **Services and products** we offer

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

## Advice services we provide

Under Count's AFS licence, we, and your Financial Adviser, are permitted to provide financial advice and services across a wide range of financial products. These include:

- Deposit and payment products including basic deposit, non-basic deposit, and non-cash payment products
- Government debentures, stocks or bonds
- Life products including investment life insurance and life risk insurance products
- Managed investment schemes including Investor Directed Portfolio Services (IDPS)
- Retirement savings account products
- Securities
- Superannuation, and
- Standard margin lending facilities.

Your Financial Adviser is authorised to provide advice in some or all of these areas and may also be authorised in other specialist advice areas.

## Approved products

Representatives of Count are generally restricted to recommending products that appear on Count's APL. These products have been assessed through a robust due diligence and approval process managed by Count Limited's product research team, with the support of independent research providers.

Count may use Lonsec Research as a primary research provider in constructing the APL. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406). Another subsidiary of Lonsec Holdings, Lonsec Investment Solutions Pty Ltd (ABN 95 608 837 583), manages portfolios that may also be included on the Count APL.

Count has also established a partnership program with a number of financial product issuers. While these issuers may have products included on the APL, any financial benefits received through the program are strictly used to fund education initiatives for Count representatives and do not influence product selection.

While other financial products may also be suitable to your needs, your Financial Adviser will generally only recommend products listed on the Count APL. If, based on your objectives, financial situation and needs, a product outside of the APL is considered appropriate, it must still meet Count's selection criteria and approval requirements before being recommended.

## Non-advised transactions

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice. In some cases, you may be asked to confirm your instructions in writing and sign an acknowledgment form to confirm that you are proceeding without advice. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

# Services Count is **not responsible for**

Count is only responsible for the financial services or products provided by your Financial Adviser in their capacity as a representative of Count. This does not include any other services your Financial Adviser may provide in another capacity, such as acting as an accountant, tax agent or in another professional role, including:

- Taxation advice and services (e.g. preparing and lodging tax returns).
- Accounting and audit services
- Self-Managed Super Fund compliance and administration services
- Advice on specific credit products (excluding margin lending)
- Business or legal advisory services
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, mortgage schemes, derivatives, general insurance or direct international share holdings
- Any other services not provided under Count's authorisation

It is important that you understand which services are being provided under Count's licence and who is responsible for them. If you are unsure, please speak with your Financial Adviser or contact Count for clarification.

When providing tax (financial) services, your Financial 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 Financial Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or entitlements that arise, or could arise, under taxation law.

# **Instructing** us

You may provide instructions in writing—by post or email—as agreed with your Financial Adviser. In limited circumstances, and only where specifically agreed, instructions may be accepted over the phone.

# **Remuneration** and fees

All advice fees, including non-advised fees, and commissions are paid directly to Count as the AFS licensee. If fees, commissions or benefits cannot be determined when our services commence, we will explain how they will be calculated and provide you with an estimate of the applicable remuneration.

## Advice fees and disclosure

The fees and costs associated with the services we offer and the products we recommend depend on the complexity of your situation and the nature of the advice provided. Advice and service fees may be calculated as a fixed dollar amount, a percentage of invested funds, an hourly rate, or a combination of these methods.

Your Financial Adviser will discuss and agree the fees with you before providing any advice or services. They will explain the calculation method and provide the actual costs in an agreement before any chargeable work begins. You can ask for more information about the fees and any remuneration we may receive.

## Statement of Advice (SoA)

Our advice normally involves a discussion with your Financial Adviser about your financial needs, concerns, objectives and strategy options. After this meeting, a written SoA is prepared and will usually be presented to you at a subsequent meeting. The fee for this process and for preparing the SoA is typically between $1,650 and $4,400 (inclusive of GST), however depending on the complexity of your financial situation and personal requirements the fee may be up to $20,000 (inclusive of GST).

## Implementation fee

If you proceed with our recommendations, an implementation fee may be payable to us. This fee may range from $0 to $10,000 as a fixed dollar fee, or between 0% and 4.4% of the funds invested, inclusive of GST. For example, on a $10,000 investment at 2.5%, the fee would be $250. If you establish and maintain a Self Managed Superannuation Fund (SMSF) with us, you may be charged an initial establishment fee from $2,500 (inclusive of GST).

## Fees for ongoing services

We may also charge you an annual adviser fee for ongoing services we provide to you. On investment products this fee typically ranges from $0 to $20,000 per annum as a fixed dollar fee, or between 0% and 1.65% per annum of the funds invested, inclusive of GST. For example, on an investment of $10,000 at 1.10%, the ongoing adviser fee would be $110 per annum.

## Fees for ad hoc services

For services provided outside any agreed ongoing service arrangement, we may provide ad hoc advice. This gives you the option to engage our services if your circumstances change or a specific need arises. Ad hoc services are charged on an hourly basis, inclusive of GST, and currently may be up to $550 per hour depending on the complexity of the advice required and the knowledge and experience of your Financial Adviser.

## Insurance products

Where we recommend insurance products, the life insurance company may pay us an initial commission and an ongoing commission. Typically, the initial commission can be up to 66% of the annual premium and the ongoing commission can be up to 22% of the annual premium. For example, if the first year's premium is $500 and we are paid 66% of that premium, we would receive $330. If the premium for the second and subsequent years is $500 and we are paid 22% of that premium, we would receive $110 per annum.

## Adviser remuneration

Your Financial Adviser is a salaried employee who may be paid bonuses on a quarterly or annual basis. The level of salary and any bonus depend on the experience, performance and compliance record of the Financial Adviser.

## Referral arrangements

If a third party refers you to us, the referrer may receive a referral fee, commission or non-monetary benefit. This is not an additional cost to you. All referral payments will be disclosed in the SoA or RoA provided to you.
Count may pay a referral fee to a referral partner, which may include an upfront amount of $100 to $500 and/or 0% to 30% of the initial and/or ongoing fees or commissions. Where a referral fee is paid, the details will be provided to you in your advice document, such as your SoA or RoA.

## Fee rebate or waiver

Count, your Financial Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees relate to support services provided by Count to its representatives and may cover expenses such as annual membership fees, software and data service fees or paraplanning fees.

## Professional Development Sponsorship

Count may receive payments from product providers which are in no way linked to volume of sales. These arrangements help Count to offset the organisational and running costs of providing education and training services to Count's representatives.

# **What else** should you **understand?**

## How we handle your personal information

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, we have adopted the principles set out in the Privacy Act 1988. For further details you can refer to Count's Privacy Policy, available at: www.count.au/privacy

As a financial service provider, we have obligations under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that your Financial Adviser may ask you to present identification documents such as your passport or driver's license and may also retain copies of this information. They cannot provide you with services if you are unwilling to provide this information.

We may use artificial intelligence (AI) tools to assist in providing services to you. These tools are used responsibly to support quality and efficiency, and you will always be asked for your permission before any conversation is recorded.

If you wish to review your personal information held by us, please contact your Adviser directly, or Count by emailing info@count.au.

## 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 you have received, for whatever reason, you should take the following steps:

## Step 1: Contact your Financial Adviser

You should contact your Financial Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

## Step 2: Contact the Count Complaints Manager

If your Financial Adviser cannot resolve your complaint, or you wish to contact Count directly, an internal process is available for reviewing your concerns impartially.

Your complaint will be escalated to the Count Complaints Manager, who will aim to resolve it quickly and fairly. They will communicate a proposed solution to you and attempt to resolve the complaint within 30 days of receipt. You will be informed if more time is needed to finalise the matter.

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| Writing: | Count Complaints Manager<br>GPO Box 1453<br>Sydney NSW 2001 |
| Phone: | (02) 8218 8778 |
| Email: | reportcomplaints@count.au |

## Step 3: Contact the Australian Financial Complaints Authority (AFCA)

If you remain dissatisfied with the outcome provided by our, or Count's internal complaints processes, or if you have a complaint that is not satisfactorily resolved within 30 days, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA is an external, independent body offering free and accessible dispute resolution services to individuals who have been unable to satisfactorily resolve their complaint.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

The AFCA contact details are:

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| Writing: | Australian Financial Complaints Authority<br>GPO Box 3<br>Melbourne VIC 3001 |
| Online: | www.afca.org.au |
| Phone: | 1800 931 678 (free call) |
| Email: | info@afca.org.au |

Any issue about your personal information, you can contact the OAIC:

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|---|---|
| Writing: | The Office of the Australian Information Commissioner<br>GPO Box 5218<br>SYDNEY NSW  2001 |
| Online: | www.oaic.gov.au |
| Phone: | 1300 363 992 (free call) |
| Email: | enquiries@oaic.gov.au |

You may also contact the Australian Securities & Investments Commission (ASIC) on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

## Professional indemnity insurance

Count has professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation arrangement under the Corporations Act.

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

# Our **Privacy Collection Statement**

We collect personal information about you (and, if applicable, anyone acting on your behalf) to help us provide financial services that are suited to your needs, to manage our relationship with you, and to meet our legal obligations under the Privacy Act 1988 and the Corporations Act 2001. This statement forms part of our broader Privacy Policy, and together they make up our formal notice under Australian Privacy Principle 5

## Why we collect your information

We need certain information to understand your financial situation and provide appropriate advice or services. The specific information we collect will depend on who you are and the nature of the services you need.

If you choose not to share some details, or if the information is incomplete or inaccurate, it may limit our ability to provide advice or services to you, or we may not be able to proceed at all. It could also mean that the advice you receive is less tailored to your situation. In some cases, we may need to end our relationship if we cannot properly meet your needs.

## Who we may share your information with

To deliver our services, we may need to share your information with:

- Product and platform providers
- External service providers (e.g. paraplanners, IT providers)
- Other professionals you've authorised us to work with (e.g. your accountant or tax adviser)

## Sharing information overseas

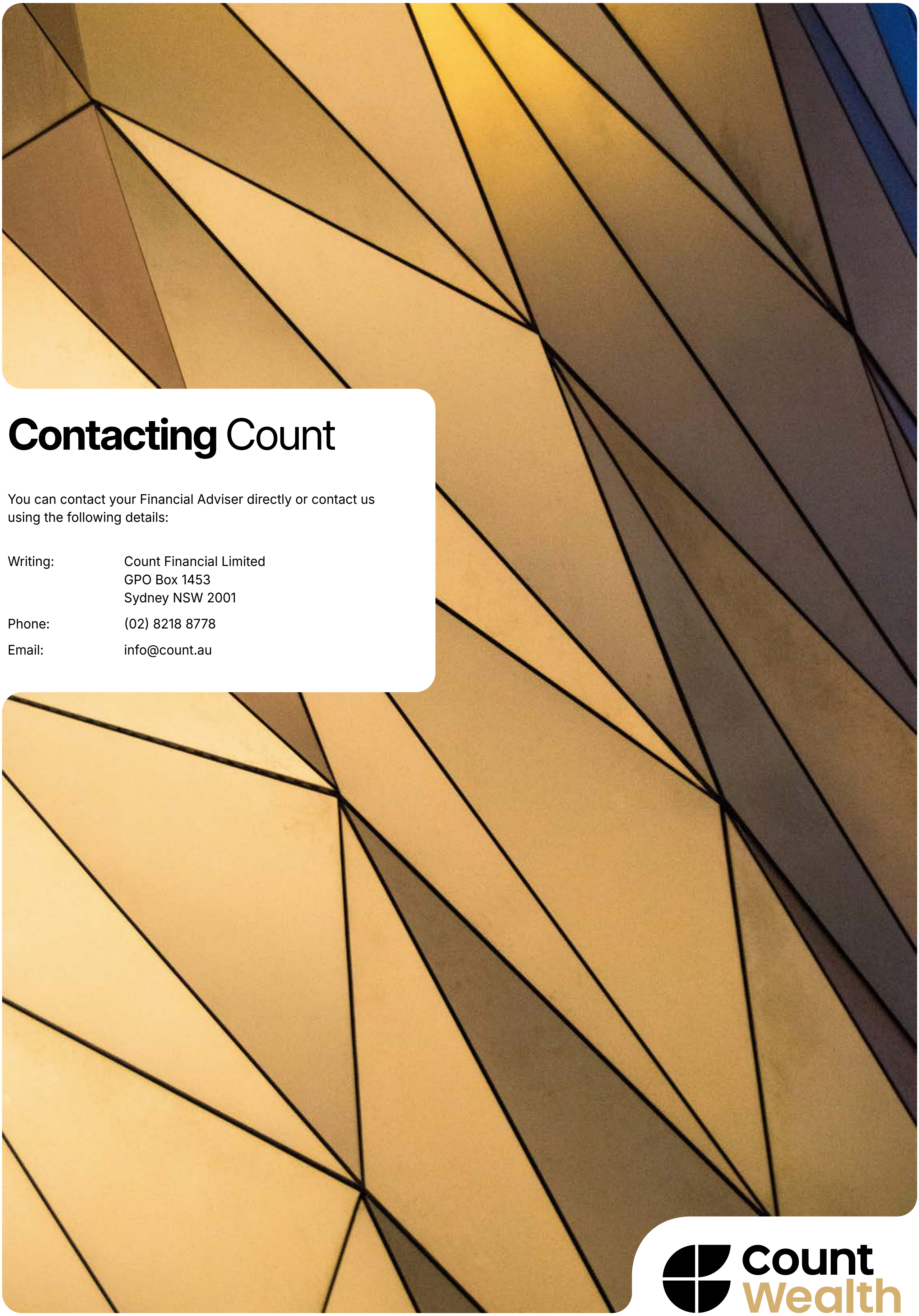
Some service providers we use may be located overseas or have operations outside Australia. Your personal information might be stored or accessed in these countries. We take reasonable steps to make sure your information is protected and handled in line with the Australian Privacy Act.

For more information about which countries your information may be sent to, please refer to Count's Privacy Policy or contact us directly. If you do not wish for your information to be transferred overseas, please let us know.

## Accessing or correcting your information

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can ask to access or correct your personal information at any time by contacting us.

A copy of our Privacy Policy is on Count's website www.count.au. We can also send you a copy if you contact us.



# **Contacting** Count

You can contact your Financial Adviser directly or contact us using the following details:

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| Writing: | Count Financial Limited<br>GPO Box 1453<br>Sydney NSW 2001 |
| Phone: | (02) 8218 8778 |
| Email: | info@count.au |