

Financial Services Guide

Picture Wealth Advisory Pty Ltd
AFS Licence No.530789

About this document.

This Financial Services Guide (FSG) is issued by Picture Wealth Advisory Pty Ltd, Australian Financial Services Licence No.530789 (PWA, 'we' or 'us'). This FSG is designed to assist you in determining whether to use any of the services offered by PWA and its representatives.

This FSG contains information about:

- Who we are and how we can be contacted;
- The financial services and products we can provide to you;
- How PWA, our employees and other related parties are paid for the financial services provided to you;
- Any associations or relationships that could create potential conflicts of interest; and
- Details of who to contact should you have a complaint.

Who is Picture Wealth Advisory?

PWA holds an Australian Financial Services Licence No.530789 (AFSL) issued by the Australian Securities and Investment Commission (ASIC). PWA conducts business through a network employed representatives who provide specific financial services. PWA is responsible for the conduct of its representatives.

Not Independent

PWA and its representatives are not 'independent', 'impartial' or 'unbiased' in relation to the provision of financial services because;

- We may receive commissions from life insurance providers associated with the issue of life insurance products (see "How do you pay for PWA advice and services")
- We may provide advice on products issued by entities with indirect ownership links to Picture Wealth Advisory Pty Ltd (PWA) see "Does PWA have any relationships or associations with Financial Product Issuers" and;
- We have several commercial relationships with product providers for the provision of education and training services to our Advisers (see "Does PWA have any relationships or associations with Financial Product Issuers").

As your Advisers, we are required to act in your best interest and will only recommend a financial product to you if it meets your needs and is appropriate. We are able to use products from a wide approved product list.

How to Contact Us?

- Call us on 08 6243 0013
- Email us at info@picturewealth.com
- Visit our website at www.picturewealth.com
- Write to us at PO Box 7857, Cloisters Square, WA 6850
- Speak to your financial adviser directly

What Financial Services and Products Are Available?

PWA's AFSL authorises it to advise on and deal in the following classes of financial products to both retail and wholesale clients. PWA may provide all or some of these services;

- Deposits & Payment Products
- Government Debentures, Stocks & Bonds
- Life & Disability Insurance
- Superannuation (including Self-Managed Superannuation)
- Managed Investment Schemes
- Retirement Savings Accounts
- Securities
- Standard Margin Lending

PWA can assist with the following financial and non-financial services;

- ➔ Investment & Wealth Creation
- ➔ Pre-Retirement & Retirement Planning
- ➔ Wealth Preservation
- ➔ Social Security / Centrelink
- ➔ Estate Planning
- ➔ Cash Budgeting & Cash-Flow Management
- ➔ Deposit & Payment Products
- ➔ Debt & Liability Management
- ➔ Salary Packaging
- ➔ Corporate Superannuation Services
- ➔ Margin Lending

What Other Documents Might You Receive?

Depending on the services provided by PWA, you may receive the following documents. You should read these documents carefully before proceeding with any financial service or product.

Statement of Advice (SoA)

All initial personal advice provided to you will be outlined in an SoA. The SoA will contain personal advice, the basis on which it is given, details of fees, commissions and information on relevant associations. The SoA is used for initial advice and further advice if your circumstances have significantly changed or the basis of the further advice has significantly changed from the previous SoA.

Record of Advice (RoA)

An RoA may be provided to you where your circumstances have not significantly changed or the basis of the further advice has not significantly changed from previous SoA. There are no limitations in relation to time or how you make your requests for a copy of the RoA.

Product Disclosure Statement (PDS)

You will receive a PDS if PWA has provided advice for you to acquire a financial product. A PDS will contain the key features of the financial product, significant risks and benefits, and fees associated with the financial product.

Privacy Policy

In order to provide you financial products or services and undertake the management and administration of those products and services, it may be necessary for us to disclose your personal information to third parties. PWA must provide you with a copy of our Privacy Policy. If you require an additional copy please ask or, download a copy from PWA's website at www.picturewealth.com.

What Information Is Maintained in Your File, Can You Examine the Client File and Who May Access It?

If you are provided with personal advice, PWA will maintain a record of your personal information including details of your objectives, financial situation and any recommendations made to you. If you wish to examine your file, please ask us and we can arrange access for you.

In order to provide you financial products or services and undertake the management and administration of those products and services, it may be necessary for us to disclose your personal information to third parties.

Your adviser must provide you with a copy of our Privacy Policy. If you require an additional copy please ask or, download a copy from PWA's website at www.picturewealth.com

How Can You Give Us Instructions?

You may specify how you would like to give us instructions. You can give us instructions or information verbally or in writing. In some situations, we will require your instructions to be in writing. We will advise you what information we need or what documentation we need you to complete and sign.

What Information Should You Provide to Receive Personal Advice?

An Adviser must act in your "Best Interests" if providing personal advice. To assist our Advisers in acting in your best interests, as well as helping us to advise you in an appropriate manner and protecting you throughout our relationship, we request you;

- Supply accurate information about your personal circumstances, needs and objectives;
- Update our representatives on any changes to this information;
- Do not make any payments for investments, contracts or fees “made payable” to your Adviser;
- Never sign blank forms; and
- Never sign any form or agree to any recommendation without fully understanding what you are signing or agreeing to.

You have the right to withhold personal information, but this may have an impact on the appropriateness of the advice you receive. You should read any warnings contained in any advice document (whether SoA or RoA) carefully before making any decision relating to a recommended financial strategy and/or product. Our representatives will request you sign an acknowledgement if you do not wish to provide complete information or if they believe that the information is not accurate.

How We and Our Employees Get Paid?

All Fees Are Payable to PWA

PWA can be paid fees from you directly, from your superannuation and investment products (for both initial, ongoing and fixed term advice) or commissions for retail insurance products, or a combination of these payment methods. We will discuss and agree with you the fees for our services before any services are provided.

PWA receives all remuneration for services provided by our representatives. From this PWA pays its employees a salary and in addition, may at its sole discretion, pay its employees bonuses, based off client satisfaction, business outcomes and risk management.

Following is a guide as to how commissions and/or fees may be charged. If you choose to receive personal advice, the Statement of Advice you receive will detail the specific payments in relation to the products recommended.

Financial Planning and Administrative Services

What we are Paid

We may charge you a Fixed Rate Fee, Hourly Rate Fee or Asset Scale Fee or a combination depending on the complexity of services provided and the time and effort in the work done for you. The fee may be a one-off fee or payable in instalments over a fixed term.

Personal Advice

Where you receive personal advice, your SoA/RoA will detail all remuneration and other benefits associated with the advice. All fees and commissions disclosed in the SoA/RoA are payable to PWA.

Retail Insurance Product Commissions

PWA may be paid initial and ongoing commissions by retail insurance product issuers where you acquire any of the retail insurance products via our services. Where the commission in the first year is greater than that payable in later years, the maximum upfront (year 1) commission is 66% and the maximum ongoing (years 2+) commission is 22% (inclusive of GST). For example, for an insurance premium of \$1,000, the commission is up to \$660 upfront and up to \$220 each year thereafter.

Where upfront and ongoing commissions are the same, there is no legislated maximum however product providers generally pay up to 33%.

Where the insurance product(s) was purchased prior to 1 January 2018, we may continue to be paid commissions in the same manner as what would have previously been advised to you at the time of obtaining the product(s).

Referral Fees

If a third party referred you to us, and you consent, we may forward referral payments or commissions to the third party. These amounts do not involve additional costs and will be in your SoA. All fees and commissions are subject to GST.

Our Referral Arrangements

We may receive payments to refer you to other service providers. These amounts do not involve additional costs and will be disclosed in your SoA. Our current referral arrangements are detailed below:

Provider	Services	Payment Arrangement
AIA Health	Health Insurance	AIA pay a referral fee if you sign up to AIA Health, of 20% of the first year's premium (plus GST). This will be paid to Picture Wealth Advisory Pty Ltd

Corporate Superannuation

We provide administration services, technical support and general advice in relation to corporate superannuation and group insurances to employers and their employees. These services may include technical support to employers on superannuation obligations, providing administrative services for policy committee meetings, assisting employers with employee induction material and providing group education sessions to employees on superannuation topics. We may be paid for these services by the;

Employer

An Employer Service Fee (ESF) may be applicable for the provision of these services. The ESF is charged as a fixed dollar amount and the fee is determined in consultation with and payable by the Employer.

Superannuation Trustee

The superannuation trustee may engage us to provide administrative and other services to employers and members who use the trustee's superannuation fund. The fee for this service is determined in consultation with the superannuation trustee and payable by the superannuation trustee.

Does PWA Have Any Relationships or Associations with Financial Product Issuers?

PWA may provide you with products and services that are offered, managed or administered by associated entities. Picture Wealth Advisory Pty Ltd (PWA) is a wholly owned subsidiary of Picture Wealth Holdings Limited (PWHL). PWHL is a diversified financial services and technology company owned by both private and institutional shareholders, including FT Fintech Holdings, LLC (an investment fund of Franklin Resources, Inc.). Franklin Resources, Inc. [NYSE:BEN] is a global investment management organisation operating together with its subsidiaries as part of the Franklin Templeton group of companies. Our advisers may provide financial services, including advice, on financial products issued by the Franklin Templeton group of companies. Your PWA adviser does not have any obligation, implied or otherwise, to recommend investment products issued by the Franklin Templeton group of companies. Your PWA adviser will only recommend an investment product issued by the Franklin Templeton group of companies if it is appropriate for you and in your best interests to do so.

PWA may receive sponsorship payments from product and service providers to fund technical and professional development training for our advisers.

PWA has commercial relationships with several of Australia's leading life risk and wealth management product providers. These companies may engage with PWA in partnership arrangements.

Some product providers may also give PWA or our representatives non-commission benefits such as entertainment or sponsorship up to a maximum value of \$300 per annum. PWA maintains a Register to document any alternative forms of payment received. These registers are publicly available and must be provided within 7 days after request.

What Are The Costs?

Advice Related Services (Incl GST)

We may provide you with an initial meeting for which there may be no charge. Further meetings including the preparation, implementation and fixed term advice will be charged by one or a combination of methods as outlined below. You may elect to be invoiced directly for these fees to be paid to PWA or you may elect to have these fees deducted from your investments. An estimated cost of services will be provided to you before commencing any work.

On-Demand Services (one-off)

Fee for Service Hourly Rate		
An hourly rate for the services we provide.	\$0 to \$660 / Hour	
On-Demand Advice Preparation Fee		From (Min) To (Max)
Upfront Advice: Flat Fee This is a one-off for the preparation of financial advice. You will be quoted and charged a flat fee based on the complexity of the advice provided. <i>Please note the advice documentation preparation fees still apply where you decide not to implement our advice.</i>	\$500	\$25,000
Implementation of Advice		From (Min) To (Max)
Implementation Fee: Flat Fee This is a one-off fee to implement or make changes to your financial products. You will be quoted and charged a flat fee based on the complexity of the implementation services.	\$0	\$20,000

Fixed Term & Ongoing advice Services (up to 12 months)

Fixed Term & Ongoing Advice Fees (includes administration services)	From (Min)	To (Max)
Fixed Term & Ongoing advice Advice: Flat Fee This is a flat fee payable for financial advice and related services, to be provided over a period of up to 12 months from the date of your agreement. <i>Please note the advice documentation preparation fees still apply where you decide not to implement our advice.</i>	\$0	\$70,000
Fixed Term Advice & Ongoing advice : Asset Scale Fee This is a percentage-based fee for financial advice and related services, to be provided over a period of up to 12 months from the date of your agreement. Example: if your account balance is \$250,000 and you are charged 0.88%, PWA would receive \$2,200 per annum.	0%	1.5%
Administration Only Service Fee	From (Min)	To (Max)
Administration Only Service Fee: Flat Fee This is a flat fee for administration services, to be provided over a period of up to 12 months from the date of your agreement.	\$0	\$5,000

Insurance Commission

Life Insurance Commission (1 st Year only)	From (Min)	To (Max)
This commission is payable by the insurance company and is a percentage of the insurer's base premium i.e. premium excluding stamp duty, fire services levy, GST, modal loadings or any other government charges, taxes, fees or levies. Example: if the annual premium was \$1,000, PWA would receive up to \$660 in the first year based on the maximum.	0%	66%
Ongoing Life Insurance Commission (Year 2 onwards)	From (Min)	To (Max)
PWA may also receive a renewal commission from the insurance company each year while your policy is in force. This is a percentage of the base annual premium you pay. Example: if your annual premium is \$1,000, PWA would receive up to \$330 per annum based on maximum.	0%	33%

Compensation Arrangements

PWA has in place Professional Indemnity (PI) Insurance cover in accordance with s.912B of the Corporations Act 2001. Our PI insurance, subject to terms and conditions, provides indemnity up to our sum insured for PWA, and employees in respect to the services provided under our AFS License.

This insurance also covers the conduct of our Advisers who were authorised by PWA at the time of providing the advice but are no longer Advisers of PWA at the time of your complaint.

What Should You Do If You Have a Complaint?

If you have a complaint about the services provided to you, please take the following steps:

1. Contact your financial adviser and advise them of the details surrounding your complaint or contact the PWA Complaints Officer on (08) 6243 0013 or compliance@picturewealth.com. PWA will try to resolve your complaint quickly and fairly.
2. If you do not get a satisfactory outcome, you have the right to take your complaint to the Australian Financial Complaints Authority (AFCA), GPO Box 3, Melbourne Vic 3001. Free Telephone call 1800 931 678 or Email info@afca.org.au. PWA is a member of this Service.

Privacy Policy

Picture Wealth Advisory Pty Ltd
AFS Licence No.530789

This policy applies to Australian Financial Services Licensee, Picture Wealth Advisory Pty Ltd (PWA, 'we' or 'us'), and our employees. This policy sets out how PWA collect and manage your personal information. The Privacy Act 1988 requires us to handle personal information in accordance with the Australian Privacy Principles.

Collection of Information – What Is Collected and Why We Collect It?

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. When PWA provides you with financial services, we may be required by Corporations Act 2001, Anti-Money Laundering and Counter Terrorism Financing Act 2006 and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to

- ➔ Your name, date of birth, TFN and contact details.
- ➔ Information regarding dependents and family commitments.
- ➔ Your occupation, employment history, employment circumstances, details family commitments and social security eligibility.
- ➔ Your financial needs and objectives.
- ➔ Your assets and liabilities (current and future), income and expenses.
- ➔ Your superannuation and insurance details.
- ➔ Your investment preferences, attitude or tolerance to investment and financial risk.

Sensitive Information

PWA may need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health, race, genetic history, etc.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing with you.

How We Collect Personal Information?

We collect personal and sensitive information in several ways, including:

- ➔ Directly from you, such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites.
- ➔ Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.

Are You Obligated to Provide Us Personal Information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us, you risk obtaining products or services that may not be appropriate or suitable for your needs and may risk suffering a financial detriment or loss.

What Happens If We Obtain Information About You Which We Have Not Solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

How We Use Your Information

We use your personal information for the primary purpose for which the information was obtained. As an AFS Licensee, that will typically mean for the purpose of:

- ➔ Providing financial services to you.

- Implementing investment or risk management recommendations on your behalf.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services. If, at any time, you do not wish to receive this information, you may contact us with this request.

When We Disclose Your Personal Information

We may disclose your personal information to the organisations described below.

- Our employees.
- The product issuers of products and services that you have elected to acquire, vary or dispose of using our assistance.
- Our external service providers.
- Your professional advisers as authorised by you.
- Our regulators

For example, information may be disclosed to the following parties:

- Product issuers for the purpose of giving effect to the recommendations made by us, and other organisations who support the products and services we offer.
- Other parties involved in the administration of your financial products or insurance cover (e.g. custodians, credit reporting bodies, actuaries, call centres, mail houses, product registries, any persons who propose to guarantee (or have guaranteed) repayment of any credit provided to you, claims assessors etc).
- Other professional advisers, including your solicitor or accountant as authorised by you.
- Our external service providers (e.g. IT providers, professional advisers and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Any person considering or acquiring an interest in our business.

Government Related Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Cross-Border Disclosure of Personal Information

We may transfer personal information to related bodies corporate or external service providers in locations outside Australia (including, but not limited to, the United States, Taiwan, Singapore, Finland, Belgium & Ireland) in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

How We Store and Secure Your Personal Information

We keep your personal information in your client file and our computer database. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, and modification or disclosure.

Hard copy files are accessible to authorised personnel only and are appropriately secured. All computer-based information is protected using access passwords. Data is backed up regularly and stored securely off-site.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a minimum period of 7 years in order to comply with legislative and professional requirements. After this, the information will be destroyed.

Ensuring Your Personal Information is Correct

We will take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and relevant. If you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

Access to Your Personal Information

You may request access to the personal information we hold about you by contacting our Privacy Officer at compliance@picturewealth.com with your request stating your advisers name and the information you require. We will respond within a reasonable period after the request is made. Where we provide you access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

Dealing with Us Anonymously

You can deal with us anonymously, or using a pseudonym, where it is lawful and practicable to do so. For example, if you telephone PWA requesting our postal address.

Our Website

When you visit our website, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our website and to improve our website.

Cookies

We use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may negatively impact your experience on our website.

Third Party Sites

Our website has links to other websites that are not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites, except as required by law. Use of links to third party websites is entirely at your own risk.

Notifying you of certain Data Breaches

A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure. If we suspect or know of a data breach, we will take immediate steps to limit any further access or distribution of the affected personal information or the possible compromise of other information. When we have reasonable grounds to believe that a data breach is likely to result in serious harm – for example identity theft, significant financial loss or threats to physical safety we will notify individuals at likely risk as soon as practicable and make recommendations about the steps they should take in response to the data breach. We will also notify the Office of the Australian Information Commissioner. Notifications will be made using our usual method of communicating with you such as by a telephone call, email, SMS, physical mail, social media post, or in-person conversation. If we are unable to contact you, (or your nominated intermediary) by any of the above methods we will publish a statement on the front page of our website and place a public notice on our reception desk.

Complaints Resolutions

If you believe that we have breached the Australian Privacy Principles or disagree with a decision that we have made in relation to our Privacy Policy, you may lodge a complaint with us. To enable us to understand and deal with your complaint in a timely fashion, you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us. Please address your complaint to our Privacy Officer. Our contact details are included below.

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, or require further information on privacy, you are entitled to contact the Office of the Australian Information Commissioner (www.oaic.gov.au)

Policy Updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website (www.picturewealth.com) or by contacting us.

PRIVACY CONTACT DETAILS

Picture Wealth Advisory Pty Ltd

Privacy Officer

PO Box 7857, Cloisters Square, WA 6850

t: (08) 6243 0013

e: compliance@picturewealth.com

w: www.picturewealth.com