

FINANCIAL SERVICES GUIDE



Holt Norman & Co Pty Ltd
ABN 36 050 195 616
Australian Financial
Services Licensee (No. 234622)
Suite 6, 1401 Burke Road
Kew East Victoria 3102 Australia

Pursuant to the Corporations Act 2001 (Cth), we are required to provide the information contained within this document (excluding the Privacy Policy) to Retail Clients.

“Retail clients” are persons:

- who invest less than \$500,000 and are not professional investors;
- whose net assets are less than \$2.5 million and gross income does not exceed \$250,000; or
- do not receive the advice in connection with a business (excluding a small business).

You have the right to ask us about our charges, the type of advice we will give you, and what you can do if you have a complaint about our services.

This Financial Services Guide (“FSG”) is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. The matters covered by the FSG include: who we are, how we can be contacted, what services we are authorised to provide to you, how we (and any other relevant parties) are remunerated, details of any potential conflicts of interest, and details of our internal and external dispute resolution procedures and how you can access them.

It is intended that this FSG (which has been authorised for distribution by the Licensee) should assist you in determining whether to use any of the services described below.

You should also be aware that you are entitled to receive a Statement of Advice, Statement of Additional Advice or Record of Advice (as applicable) whenever we provide you with any advice which takes into account your objectives, financial situation and needs. The Statement of Advice, Statement of Additional Advice or Record of Advice will contain the advice, the basis on which it is given and information about fees, commissions and associations which may have influenced the provision of the advice.

In the event we make a recommendation to acquire a particular financial product (other than securities) or offer to issue or arrange the issue of a financial product, we must also provide you with a Product Disclosure Statement containing information about the particular product which will enable you to make an informed decision in relation to the acquisition of that product.

Key information is set out below. If you need more information or clarification, please ask us.

YOUR QUESTIONS ANSWERED

1 Before you get our advice

Who will be providing the financial service to me?

Details pertaining to your Adviser are included in the attached Adviser Profile.

Your Adviser is an Authorised Representative of Holt Norman & Co Pty Ltd.

Your Adviser will be acting on behalf of Holt Norman & Co Pty Ltd.

Who will be responsible for the advice given to me?

Holt Norman & Co Pty Ltd is responsible to you for any advice provided by your Adviser.

Holt Norman & Co Pty Ltd Advisers provide the following Advisory Services:

- Financial Planning & Investment Strategies;
- Superannuation & Rollover advice;
- Self Managed Super Funds (SMSF);
- Centrelink Advice;
- Portfolio Management;
- Buying & Selling Shares;
- Risk Management (Insurance Advice)
- Retirement Planning; and
- Estate Planning.

Holt Norman & Co Pty Ltd Advisers are authorised to provide both general and personal product advice and deal in the following kinds of financial products, unless stated otherwise in the attached Adviser Profile.

- Managed Investments;
- Admin Services such as Wrap Accounts;
- Terms Deposits and Cash Management Trusts;
- Shares;
- Bonds and Debentures;
- Superannuation, including SMSF;
- Annuities & Pensions;
- Retirement Savings Accounts; and
- Life Insurance.

What financial services are available to me and what products do they relate to?

Your Adviser is authorised by Holt Norman & Co Pty Ltd to offer you the services outlined in the Adviser Profile.

Who do you act for when you provide financial services to me?

Holt Norman & Co Pty Ltd may act on behalf of various entities when providing advice to you. This will be disclosed to you prior to any investment being made.

Nevertheless, at all times, we shall act in your best interests when providing you with advice.

How will I pay for the service?

- How much commission/fee do you get?
- How are commissions/fees calculated?

Holt Norman & Co Pty Ltd may receive upfront commissions, in which case the payment will be made to us by the stockbroker, fund manager, life company, product issuer you invest/contract with. Generally the commission will be based on the amount you pay, and may vary from product to product. Upfront commissions may be up to 5% of the amount you invest, with a further 5% payable as a marketing fee. For example, for an investment of \$10,000 in a product whose manager pays us 5%, we will receive an upfront commission of \$500. If we are also entitled to a 5% marketing fee a further \$500 will be paid to us by the product issuer.

Commissions may also be paid during the life of your investment/contract. The amount we may receive varies depending on the circumstances, although typically we may receive an ongoing commission of 0.275% to 1% per annum of the value of your holding in a product for as long as you hold the product.

Details are contained in the product information brochures available from your Adviser. Your Adviser can provide full details within the Statement of Advice.

If you request that we prepare a financial plan we may agree for you to pay us a fee based on the time we spend in developing the plan. However, if you proceed with our recommendations and instruct us to implement the plan we may waive the plan preparation fee.

Once the plan is implemented we will charge an ongoing fee for managing your portfolio of investments. Portfolio fees are charged as follows:

Portfolios less than \$50,000

For portfolios with a total gross value of less than \$50,000 you will be charged 0.75% of the total value under management (plus GST) every 6 months.

Portfolios with a gross value between \$50,000 and \$100,000

For portfolios with a total gross value of between \$50,000 and \$100,000, you will be charged 0.75% of the total value under management (plus GST) every 6 months.

A direct debit will be put in place to deduct the amount of \$68.75 (incl. GST) per month. Please note that this annual fee of \$825 will be adjusted in accordance with your valuations. E.g. The difference owing will either be deducted or repaid to your account.

Portfolios with a gross value greater than \$100,000

If the total gross value of your portfolio is greater than \$100,000 you may select from one of the following options:

1.5% (plus GST) of the total assets under management per annum.

OR

7.5% (plus GST) of the increase in the value of your portfolio.

Please Note: Increase includes both the growth (market value) and income (dividends and interest) generated by your investment.

An annual minimum fee of \$1,650 (incl GST) applies to portfolios greater than \$100,000 and is to be paid by direct debit on a monthly basis (\$137.50 per month).

Do any relationships or associations exist which might influence you in providing me with the financial services?

In addition to fees and commissions, from time to time Holt Norman & Co Pty Ltd and/or your Adviser may also receive once-off or ongoing 'Alternative Forms of Remuneration' (also known as soft dollar benefits) that may result in a potential Conflict of Interest.

The Alternative Forms of Remuneration that may be received, such as the aforementioned marketing fee, are not an additional charge to you rather they are paid out of the fund managers / platform providers own resources.

Holt Norman & Co Pty Ltd and/or your Adviser are both required by law to maintain a soft dollar register listing all material forms of alternative remuneration received. This soft dollar register is publicly available and a copy will be provided to you upon request.

Where specific soft dollar benefits are known at the time of providing the advice to you, we will specifically disclose such details in the Statement of Advice (SoA), Statement of Additional Advice (SoAA) or Record of Advice (RoA).

Where you have been introduced to us by a third party such as other financial planners, accountants or lawyers, who are not an authorised representative of Holt Norman & Co Pty Ltd, we may pay an introductory fee in relation to the referral.

Where we pay a fee in relation to that referral, we will fully disclose to you in the Statement of Advice, Statement of Additional Advice or Record of Advice who will receive that fee and the amount they will receive.

Apart from those mentioned in this Financial Services Guide, there are no current relationships in existence between Holt Norman & Co Pty Ltd or its' Authorised Representatives which may influence the advice provided to you

2 *When you get our advice*

Do I get detailed information about actual commissions and other benefits my Adviser receives from making the recommendations?

Yes. You have the right to know about details of commissions and other benefits your Adviser receives for recommending investments. We will provide this information to you when we make specific recommendations.

Will you give me advice which is suitable to my needs and financial circumstances?

Yes. But to do so we need to find out your individual objectives, financial situation and needs before we recommend any investment to you.

You have the right not to divulge this information to us, if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

For non-retail clients, whilst every care is taken to match your objectives, financial situation and needs before we recommend any investment to you, you are required to undertake your own assessment to verify these have been met.

What should I know about any risks of the investments or investment strategies you recommend to me?

We will explain to you any significant risks of financial products and strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you.

For non-retail clients, it is expected that you also undertake your own due diligence to verify the suitability of our recommendations to you.

What information do you maintain in my file and can I examine my file?

We maintain a record of your personal profile which includes details of your investment objectives, financial situation and needs.

We also maintain records of any recommendations made to you in a Statement of Advice, Statement of Additional Advice and/or Record of Advice.

We also have a Privacy Policy which is included with this document. It details how we treat privacy and security of your personal information.

If you wish to examine your file, or receive a copy of any Statements of Advice, Statements of Additional Advice and/or Records of Advice, please contact your Adviser and we will make arrangements for its availability.

Can I tell you how I wish to instruct you to buy or sell my financial products?

Yes. You may specify how you would like to give us instructions. For example: by telephone, fax or other means.

You can agree that when you, verbally or by electronic means, ask for advice regarding investments, we can transact on your verbal or electronic instructions provided:

1. In the preceding 12 months you have been given a Statement of Advice; and
2. Your relevant personal circumstances, financial situation, investment objectives and needs have not significantly changed.

In this case you will be provided verbally or by electronic means with the information which would otherwise need to be included in a Statement of Advice. We will prepare a Record of Advice which can be sent to you if requested. Your request for a Record of Advice may be made in writing, by telephone or by faxing our office.

3 If you have any complaints

Holt Norman & Co Pty Ltd is committed to providing quality advice and accurate information. As part of that commitment, we are focused upon improving client satisfaction by providing an efficient and accessible system for complaint resolution.

Who can I complain to if I have a complaint about the provision of financial services to me?

If you have any complaint about the service provided to you, you should take the following steps.

1. Contact your Adviser and tell your Adviser about your complaint.
2. If your complaint is not satisfactorily resolved within 3 days, please contact Inspector Compliance Pty Ltd. GPO Box 4294, Melbourne, VIC, 3001. Ph. (03) 9607 6388. We will always endeavour to resolve your complaint quickly and fairly.
3. If you remain dissatisfied with the outcome of your complaint or if we have not responded after 45 days (or 90 if we inform you that extra time is needed), please contact Financial Industry Complaints Service Ltd. The toll free number is 1300 780 808.
4. If your concerns question our ethical conduct, please bring this to Peter Holt's immediate attention or put your concern in writing and address it to Peter Holt, Holt Norman & Co Pty Ltd, Suite 6, 1401 Burke Road Kew East VIC 3102
5. You can also contact the Australian Securities and Investments Commission (ASIC) on 1300 300 630. You may contact ASIC to make a complaint and obtain information about your rights.

PRIVACY STATEMENT

At Holt Norman & Co Pty Ltd we recognise the importance of protecting your privacy. Our policy for dealing with personal information you might disclose to us is explained below.

The types of personal information we collect from you depends on how you correspond with us. Any information we receive about you will be treated as strictly confidential.

What we collect and why we need it

In accordance with the Corporations Act we are required to collect certain information from our clients. The information is necessary to ensure we give you advice that is appropriate to your needs and circumstances. If you fail to provide us with necessary information to ascertain your needs and personal circumstances, it may be appropriate for us to discontinue providing you with financial advice.

We will only collect personal information about you where you have knowingly provided us with the information or you have authorised a third party to provide that information to us.

Generally, your information will be collected in face to face interviews, over the telephone or via electronic means. From time to time additional or updated information may be collected through one or more of these methods.

The information we collect, use and maintain is necessary for us to adequately provide you the services you have requested. These services may include:

- The preparation of your financial plan;
- The provision of financial planning advice to you;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- Other activities as directed by you.

The information may also potentially be used for the purposes of direct marketing where we believe the articles and information may be of interest to you. If you do not wish to receive such information, please inform us and we will amend your details accordingly. Please allow us two (2) weeks for your request to be actioned.

Disclosure of information collected

We will not use or disclose personal information collected by us for any purpose other than the following:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure;
- Where you have consented to such disclosure; or
- Where the National Privacy Principals (NPP's) authorise use or disclosure where required or authorised under law;

- Disclosure to other entities for the purpose of giving effect to your instructions and/or our recommendations (such as to Superannuation Funds);
- Your information may be disclosed to compliance bodies, such as the Australian Securities and Investment Commission;
- We may disclose your information for the purpose of prospective buyers conducting due diligence investigations on our company. In such a case, the disclosure will be made in the strictest confidence and it will be a condition of disclosure that no personal information is disclosed or used by them; or
- If the company is sold, your personal information may be transferred to any new owner. As a client, you would be informed of any such transfer.

Security of your personal information

In general, your personal information is held in your client file. This could be recorded on paper only or electronically only or a combination of paper records and electronic records.

Regardless of the form of your record, we will at all times seek to ensure that any personal information collected and held by us is protected from misuse, loss, unauthorised access modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

In the event that our professional relationship ceases, any personal information we hold about you will be securely maintained for a period of not less than seven (7) years in order to comply with legislative and professional requirements imposed on us. After this time, your records containing your personal information will be destroyed.

E-mail correspondence

We will preserve the contents of any e-mail message that you send us if we believe that we have a requirement to do so. E-mails sent to or from Holt Norman & Co Pty Ltd may be monitored for systems administration and legal compliance purposes.

Gaining access to our information on you

We will, on request, provide you with access to any information that we have collected about you. To gain access to this information you should contact us at pholt@hna.net.au or telephone (03) 9859-7090

What to do if you believe the information we hold about you is inaccurate

It is important to us that the information we hold about you is up to date and accurate. Accordingly, we encourage you to contact us to advise us of any change in your personal circumstances that may affect the information we hold about you. If at any time you believe that any information we hold about you is inaccurate or out of date, please contact us and we will review and correct the relevant information.

Complaints in relation to privacy

If you believe your privacy has been compromised, please contact us immediately. We will respond to all complaints within two (2) days and aim to have them resolved within ten (10) days. Where this is not possible, you will be contacted and advised when it is likely your complaint will be resolved.

Additionally, you are entitled to contact the Privacy Commissioner if you believe there has been an interference with your privacy.

The Office of the Federal Privacy Commissioner can be contacted on 1300 363 992 or privacy@privacy.com.au.

How to contact us

If you wish to discuss any aspect of our policy further, or you wish to make a complaint, please contact us at pholt@hna.net.au or telephone (03) 9859-7090.

PLEASE NOTE: THIS PRIVACY STATEMENT IS ONLY REQUIRED WHERE ANNUAL TURNOVER (COMMISSION) IS MORE THAN THREE (3) MILLION DOLLARS



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