



AVALONFS™

PARTNERING WITH CONFIDENCE

Financial Services Guide

ABN 43 162 297 298

AFSL: 437518

VERSION 5.0

1 July 2021

IMPORTANT INFORMATION ABOUT THIS GUIDE AND AVALONFS Pty Ltd

AVALONFS Pty Ltd (AVALONFS) is the provider of any personal advice that you may receive and this Financial Services Guide (FSG) has been designed to provide you with important information about these services.

In this FSG 'we', 'our', 'us' or 'AVALONFS' means AVALONFS Pty Ltd (ABN 43 162 297 298) holding Australian Financial Services Licence (AFSL) 437518 (AVALONFS).

AVALONFS is a professional Australian financial services advice licensee offering a comprehensive range of financial services and central to our core values is the provision of financial advice that is solely in the best interests of our clients.

AVALONFS advisors adhere to the financial services laws and the Code of Ethics at all times.

IMPORTANT NOTE ON ADVICE

Your adviser is authorised by AVALONFS to provide financial product advice in the areas specified within their Certificate of Authorisation issued by AVALONFS. Your adviser is limited to financial service advice and products detailed within this FSG.

The authorisations that your adviser is able to provide are detailed on the last page of this FSG. AVALONFS does not provide advice in the areas of taxation, derivatives, lending (other than margin loans and gearing), and/or property.

For clarity, your adviser may also be able to provide advice, other than financial services advice, such as accounting, lending and/or taxation, but only if they are a qualified accountant or tax agent; they may also be able to provide mortgage advice if they are a broker authorised under a licensed credit provider, and/or property but only if they are a licenced real estate agent.

Again, advice in these areas is not provided by AVALONFS and should not appear in any advice documents provided to you by your adviser from AVALONFS, if any of the above are detailed in your SoA please contact AVALONFS immediately.

ABOUT THIS FSG

This FSG is an important document which provides you with information about AVALONFS and the advice and services that we are licensed to provide, any fees you are likely to pay for that advice will be detailed in your Letter of Engagement and/or your Statement of Advice.

Each adviser is issued with a Certificate of Authorisation which defines the advice and products the adviser is able to provide to you.

At the back of this FSG is an Authorisation Statement which details the authorisations of the specific knowledge areas and experience of your adviser.

"Lack of Independence" Statement

Your advisor may receive commission on life insurance products as explained in this FSG. For this reason, we cannot refer to ourselves or our advice as independent, impartial or unbiased. (See also Conflicts of Interest – Risk Products)

You must read all of this guide carefully.

Key Information Statement

The Financial Services Guide (FSG) is designed to assist you in deciding whether to use any of the products and services offered by AVALONFS and our advisers.

The information in the FSG covers such aspects as:

- Information about AVALONFS as licensee
- Who will be responsible for providing the financial services described within this FSG and provided to you as the client.
- Details of the financial services and/or products AVALONFS can provide as well as details of what services and/or products AVALONFS does not provide
- The financial planning process
- Documents you may receive
- Further important information about the advice/recommendations
- Remuneration received by AVALONFS and your adviser
- Relationships which might influence AVALONFS or your adviser in providing financial services
- The complaints procedure and compensation arrangements

Should your adviser provide advice and/or a financial product to you, you will receive a Statement of Advice (SoA) as well as various disclosure documents such as Product Disclosure Statements (PDS).

The SoA details the financial advice provided to you, and covers such matters as the advice and product recommendations, any remuneration payable, the risks and disadvantages associated with the advice and/or product recommendations, and all details of any relationships which might influence your adviser in providing the financial advice and/or product recommendations.

The PDS details all aspects of the investment and/or risk insurance product(s) recommended. The purpose of these documents is to keep you fully informed and to provide you with an understanding of the advice and the products recommended within the Statement of Advice (SoA).

Relationship between AVALONFS and your adviser

Your adviser provides financial services on **behalf of AVALONFS Pty Ltd AFSL 437518 (AVALONFS)**.

When your adviser has adhered to AVALONFS's Approved Product List, AVALONFS is responsible to you for any of the financial advice services and products your adviser has recommended.

This FSG includes details of the adviser's Authorised Representative number, accreditations, qualifications and experience, the areas of advice and types of investment and/or risk insurance products or services we have authorised your Advisor to provide to you.

Details of remuneration payable by you to your adviser are generally negotiated between you and your adviser and will be detailed in various documents such as the Letter of Engagement and Statement of Advice.

AVALONFS demands a minimum standard of professional behavior from all of its advisors and advisers are required at all times to act in the best interests of their clients, to act honestly, professionally, fairly, efficiently, objectively and without conflict in the provision of the financial services offered by AVALONFS.

You may ask for a copy of the original Certificate of Authorisation at any time from your Advisor or AVALONFS.

Financial services and product offering by AVALONFS

AVALONFS is authorised to offer services and/or products to you in the following areas:

- Financial Planning
- Salary packaging
- Social security
- Estate planning
- Basic and non-basic deposit product
- Managed Investments
- Gearing strategies
- Bonds and fixed interest
- Securities
- Superannuation
- Retirement planning advice
- Self-Managed Superannuation Funds advice
- Personal and business risk insurance
- Standard margin lending

Your Advisor may only be authorised to provide advice to you in **some** of the above areas.

Please refer to the Authorisation Statement at the back of this FSG which sets out the areas of advice and types of products that your Advisor is able to provide.

What services and or products does AVALONFS not provide?

AVALONFS is responsible for only those services and products set out in its AFSL and your advisors FSG.

The Advisor **must not** provide any other services or products other than those listed in their Certificate of Authorisation. The products below are examples of advice services and products not supported by AVALONFS.

- | | |
|---|---|
| <ul style="list-style-type: none">• Banking services (other than cash or term deposits)• Credit assistance and credit activity• Loan facilities including residential loan facilities, other than those that encompass both a margin loan | <ul style="list-style-type: none">• General insurance advice• Legal advice• Accounting and Tax advice• Real estate property advice• Derivatives or Foreign Exchange |
|---|---|

If you have any concerns in this regard please contact our Head of Compliance directly on 0451 283 696.

The Financial Planning Process

AVALONFS's aim is to ensure that you are provided with advice that is tailored to your needs and in your best interest.

The steps that follow provide an overview of how this process operates, and ensures that the proper disclosure of the risks associated with your particular investments and insurances are explained. It is important that you provide us and your adviser with the correct information about your actual circumstances so that we are able to provide you with the appropriate advice to meet your specific requirements and needs.

Step 1

Firstly, you have been provided with this FSG.

In the case of any general advice that has been provided, you will have been provided suitable general advice warnings.

In order that your Advisor can provide you with the most appropriate advice, you will be asked to provide information about your personal circumstances. This will include information about your short and long term goals & objectives and your current financial situation.

Step 2

The information collected is recorded in a Client Data Form. This together with a Client Risk Profile assessment enable the Advisor to understand your needs and objectives and to analyse and determine the most appropriate advice for your particular circumstances that are in your best interests.

Step 3

Consideration is also given to the identification of any financial issues that may be present or that may arise in the future such as long-term illnesses. The solution

will be tailored using well researched products from the AVALONFS Approved Product List (APL) and matched to your relevant personal needs and objective, matching the portfolio to your risk profile and protecting those plans once put in place.

Step 4

A Statement of Advice (SoA) is then prepared and provided to you by your Advisor.

This SoA sets out various recommendations made by your adviser, the basis on which those recommendations are made and, amongst other things, the remuneration payable for researching, designing, implementing and maintaining those products and services recommended.

Step 5

Subject to your agreement and signed instructions, the recommendations will be implemented.

Step 6

The information contained in the SoA, will be reviewed and revised at regular intervals as agreed by you, or when your particular circumstances change.

Documents you may receive

You may receive one or more of the following documents when the Advisor provides advice and/or any recommendation(s) on investment and/or risk insurance products to you:

1. Statement of Advice (SoA)

The SoA may be a full advice document given to clients where personal advice has been provided with that advice taking into account your current financial position, goals, objectives, as well as your short, medium and long term needs.

You must confirm your adviser's assessment of your personal financial circumstances, goals and objectives and risk profile as well as confirming acceptance of the advice provided through the SoA.

Key information contained within the SoA advice document may include:

- Your personal and financial circumstances;
- Your stated goals and objectives;
- The advice given;
- The basis on which the advice and/or financial product recommendations are given;
- The risks and/or disadvantages associated with the advice/recommendations;
- Information about remuneration or other benefits that may be received; and
- Any benefits, interests or associations that may have influenced your adviser in the provision of the advice.

Incorporation by Reference (IBR)

An SoA may refer to other documents, this means that the document referred to is part of your SoA. You must read any documents referred to by the SoA as they form part of the advice.

Limited or scaled advice

Some SoAs may be scaled advice SoAs where the advice contained is limited to specific advice either requested by you the client, or limited because you did not want to provide personal details or refused the complete advice offered.

In these circumstances you will be required to acknowledge these limitations.

2. Record of Advice (RoA)

If your adviser has previously provided you with a SoA and then provides you with additional advice which is related to previously provided advice, generally in the form of product advice, and inclusive of periodic reviews (which takes into account your relevant personal circumstances), you may receive written confirmation of that advice. This may be in several forms but is still considered a RoA and will be added to your client file along with any notes.

If further or additional advice is provided by your adviser, you are able to request a written copy of that advice (if it has not already been given) by contacting your adviser in writing. You may make such a request up to seven years after the advice has been given.

3. Supplementary Statement of Advice

SSoA represents additional advice to be incorporated as part of the original SoA. The SSoA is used to provide further advice to a client with whom a SoA has previously been provided, but the advice is to supplement advice already provided.

Its usage avoids unnecessary duplication of information already provided to you the client. However you are likely to be required to sign a confirmation that your circumstances have not changed materially from those confirmed in the previous SoA.

4. Product Disclosure Statement (PDS)

Should your adviser make a recommendation to you about a particular investment and/or risk insurance product or offer to arrange the issue of a financial product on your behalf, you will receive a PDS, prepared by the product provider.

The PDS will contain information that will assist you in making an informed decision about that product and should be viewed as an extension of the SoA.

The PDS usually includes information about product features, risks that your adviser should go through with you in detail, the costs associated with that product as well as details of other fees and charges which may apply, including management expense fees and other fund manager costs.

These are detailed in the PDS and described as Management Expense Ratios or Investment Cost Ratios (MERs/ICRs).

Usually, the PDS will contain the application document that you will be required to complete in relation to that investment or risk product.

Further information about the advice and / or recommendations

Will advice be given that is suitable to your needs and financial circumstances and in your best interest?

Your adviser is obliged to do so by the Code of Ethics and the law and must be able to demonstrate to you that a reasonable basis exists which supports the personal advice provided to you, and that the advice is in your best interest, and, apart from any specified, is free of conflicts.

To be clear, your adviser will need to ascertain your goals, objectives, financial situation, relevant personal and financial circumstances and needs before he or she recommends any advice, investment and/or risk insurance products or services to you.

You will be asked to provide accurate information on the above and to keep your adviser updated on any changes to ensure the advice provided and products recommended remain relevant to your personal circumstances.

You have the right not to divulge any information should you not wish to do so. In that case, your adviser will warn you about the possible consequences of not providing relevant personal and financial information including limitations on the advice which can be provided. Should you withhold information regarding your health when purchasing personal insurances, in the event of a claim it is more than likely that any personal insurances put in place by your adviser could be cancelled from inception. You must disclose all health issues, no matter how old or minor when applying for personal insurances.

You should thoroughly read the information in your SoA before making any decisions relating to the advice or any investment and/or risk insurance product or service.

What should you know about any risks of the advice, investment and/or risk insurance products or services that are recommended to you?

Please be aware that there are risks associated with investing in financial markets which may adversely affect the value of your investment(s).

Your adviser will explain to you, and fully outline in the SoA, both the generic and specific risks of the financial products recommended to you.

PDS may also outline the key risks associated with that particular product being recommended and you must read and consider both the risks & any disadvantages laid out in the SoA in conjunction with the relevant PDS material before proceeding to purchase any product recommended.

If you feel that you need further clarification in any area of the advice or product contained in the SoA, please ask your adviser prior providing your signature to proceed. You must not proceed if you do not fully understand the advice and/or products recommended.

Does AVALONFS provide Tax advice?

NO. Although AVALONFS and the majority of its advisors are Registered Tax advisers with the Taxation Practitioners Board (AVALONFS Pty Ltd TPB RN: 25313984) AVALONFS does not provide taxation advice. If you must rely on any tax examples within the SoA, you should seek your own taxation advice from a tax specialist. Any calculations within the SoA are examples only and should be checked with your accountant.

Reviews

Markets, investments, and your personal and financial circumstances can change over time.

Reviewing your goals, circumstances, advice, investments and/or risk insurance products held, is vital to ensuring that you remain on track to meet your short to long-term objectives.

A comprehensive personal review service is provided by advisors to all our clients, which will update your advice in line with your ongoing needs, and will implement any changes agreed by you.

AVALONFS requires its advisers to provide at a minimum an annual review to each and every client who is paying an ongoing service advice fee. This fee is charged for any and all ongoing investment advice dependent on the type and the complexity of the service being provided to you by your adviser.

Your adviser will provide you with details of any fees to be charged in relation to the advice and implementation work for you. These fees will be quoted in any Letter of Engagement and detailed in the Statement of Advice (SoA). Any ongoing service fee will be explained in full within the SoA.

No ongoing service fee can be charged without your prior and agreed written consent. On an annual basis you will also receive a Fee Disclosure Statement detailing the services and fees paid through the year, as well as providing you with an estimate of your forthcoming years services and fee estimates.

Fees and other important information

AVALONFS and your adviser - fees.

As AVALONFS is the licensee and is responsible for all advice provided to you, and all fees and commissions whether directly from you the client, or from a product or platform provider authorised to do so by you, must come to AVALONFS.

You should note that AVALONFS does not receive, and will not allow, any conflicted remuneration (I.E. Volume bonus, asset commissions etc) to be paid to AVALONFS or your adviser, from any product providers.

However, AVALONFS may receive sponsorship monies from product providers to assist in adviser education, IT and advice research. This is covered further in this document.

Your Advisor **does not share** any part of their fees or commissions with AVALONFS, that is, AVALONFS remits 100% of all fees and commissions due to your adviser, directly to your adviser.

Your adviser is required to pay a Monthly Advisor Fee (MAF) to remain authorised with AVALONFS, as well as to receive all of the services we provide to your adviser. This fee is a flat fee and has no correlation with the amount of business written nor any Funds Under Advice (FUA). AVALONFS is contractually able to deduct any monies owed from these adviser fees and commissions.

What remuneration will your adviser receive?

Fees are always agreed between you and the adviser and must be detailed by your adviser in any Letter of Engagement and/or the SoA or other advice document. The cost of providing advice, a financial product or service to you will depend upon the nature and complexity of that advice, financial product and/or service provided.

Generally, whenever your adviser provides a recommendation for an investment and/or risk insurance product or other service, your adviser will be compensated through a combination of: Initial Fee for the advice and/or service, an Ongoing Advisor Service Fee when you have agreed to the provision of an Ongoing Service Fee Arrangement (OSFA), and insurance commissions from any products received by you. Insurance commissions are not considered to be an OSA.

Likely fee process you may undergo with your adviser:

- a) Meet adviser and receive this FSG and a Letter of Engagement which may include an invoiced initial fee;
- b) In a further meeting(s) you will receive an SoA which will clearly detail: Initial fees, any ongoing services fee as well as any commissions to be paid;
- c) All initial fee payments are deposited within the AVALONFS Advisor Fees Trust Account;
- d) Any Ongoing Advisor Service Fee is received into this AVALONFS Advisor Fees Trust Account;
- e) Commission payments are received into AVALONFS Advisor Fees Trust Account;
- f) AVALONFS will pay 100% of the amounts owed to the adviser, less any monies owing to AVALONFS.

Initial Advisor Fee(s)

Any fees payable by you will be detailed in the Statement of Advice provided by your adviser.

All Initial Fees will be paid directly to AVALONFS. If for investment or superannuation advice this may be cheque, credit card or EFT, or paid via the issuer of the investment product(s), which your adviser has recommended.

This payment may be directly by you, or deducted from the initial amount you have invested with the relevant product provider at the time the investment product is placed and issued to you.

This fee should not be confused with contribution fees which, for the most part, no longer exist.

With risk insurance products, this commission is not deducted from the insurance premium as it has already been priced into the product. It is paid to AVALONFS by the relevant insurance provider and is calculated on the premium payable.

All insurance products have upfront commissions and ongoing commissions which in certain circumstances can result in a conflict of interest. However, all advisers must act in your best interest.

Ongoing Service Fee Arrangement(OSFA)

If an OASF is to be charged, this fee may be either:

- A fixed dollar amount;
- A percentage of the value of funds initial investment;
- A determined amount, based on the number of hours spent developing your advice document; or
- A combination of the above.

Any ongoing services will be detailed in the SoA.

The OASF can be paid directly but generally is deducted from a particular account or product. Where you receive advice on superannuation and your other investments and/or insurance you may receive two (2) invoices.

Ongoing services your adviser may supply include: portfolio maintenance, regular reviews and an annual review.

Your adviser will provide you with further details where relevant and these will always be detailed in your SoA.

Your adviser will also provide you with a detailed breakdown of these ongoing service fee arrangements on an annual basis in a fee disclosure statement (FDS).

Alternatively your adviser may invoice you annually but will still provide you with an FDS at the end of the year.

Conflicts of Interest – Risk Products

Where your adviser advises you to take out life insurance, they may receive commission based on the premiums charged by the product issuer for the insurance you purchase. Consequently the more insurance you purchase, the more commission your adviser receives. Countering this is that our advisers work in your best interest and other than commissions, which are generally consistent across life insurance companies, receive no bonus' for providing a particular product. In all cases your adviser is able to reduce the amount of commission they are entitled to and you may wish to discuss this with your adviser.

Referred Clients

Should you be referred to your adviser by a third party, (e.g. an Accountant), the third party may receive a fee, commission or other benefit for that referral. This fee comes out of the fees received by your adviser and does not represent an additional cost to you. You will receive more detailed information concerning any referral fees in your SoA.

Broker fees

AVALONFS may receive a payment from a share broker for an Initial Public Offer or some other listed product through the ASX or foreign exchange. AVALONFS may pass these on to the adviser if it is possible to do so under the law.

All fees are described in the SoA or other related document provided to you at the time the advice is provided.

Related Parties and sponsors

Your adviser may make a recommendation in relation to an AVALONFS Model Portfolio, a Separately Managed Account or Managed Discretionary Account (MDA) advised by PacReef Asset Management Pty Ltd AFSL: 488045 (PacReef) which provides advice to AVALONFS) and issued or implemented on a platform such as netwealth, AMP North, HUB24, xPlore, Wealth02 and others. AVALONFS Directors, staff and advisors may own shares in PacReef and therefore may receive dividends, director fees and/or intellectual property fees from PacReef.

advisers are prohibited by law and the Code of Ethics from receiving conflicted remuneration i.e. commissions or ongoing commissions or volume bonus from any companies, including PacReef and therefore PacReef does not pay commissions or other forms of bonus' or any type of compensation to advisors or to AVALONFS.

PacReef, like other product providers, **may** contribute to AVALONFS through sponsorship funds to enable AVALONFS to run its Professional Development Days (PDDs) and conferences to maintain adviser education. Sponsorship monies may also be used to pay for research and IT such as Lonsec and FE Research.

Sponsorship funds cannot be and are not used for any other purpose than those specified here.

AVALONFS may also receive sponsorship monies from other product providers for partnering, like PacReef, in the ongoing development of adviser education. AVALONFS is selective in the choice of partners to ensure that NO undue influence is applied to advisers in the promotion of particular products and are selected in their ability to present at adviser development days in their particular sector or area of expertise. AVALONFS warrants that it will

not promote a sponsor's product over another product issuer's product and we go to great lengths to ensure that all advice is unbiased. Sponsorship does not preclude other product issuers from coming to these events.

Recent non-related sponsors have included Russell Investments, AUSBIL, Centuria, Russell Investments, LaTrobe, AMP Capital, and Lazard. Please refer to our website as this list can change without notice.

Any and all sponsorships are recorded within AVALONFS's Gifts and Benefits Register.

Advisor Incentives

Neither AVALONFS nor its adviser receive any product-based volume bonus commissions or other product or fund incentives based on funds under advice. This type of remuneration is defined as 'conflicted' and is not acceptable under the Corporations Act as defined in Regulatory Guide RG 246 as well as FASEA's Code of Conduct.

Alternative Remuneration

In accordance with industry requirements, and as outlined in the Financial Services Council (FSC) and as required by the Corporations Act and Regulatory Guides issued by ASIC from time to time, AVALONFS and your adviser maintains a Gifts and Benefits Register.

This register is governed by the AVALONFS Gifts and Benefits Policy which must be adhered to at all times.

The Register contains information about any alternative forms of payments or soft dollar benefits over \$300 that may be received, (e.g. lunches, gifts, tickets to events and conferences).

If you wish to inspect the Gifts and Benefits Register, please ask your adviser or contact our Head Office.

What information does AVALONFS maintain in your file and can you examine the file?

Your adviser must maintain an electronic record of your personal information, which includes details of your relevant personal circumstances. They will also maintain records of any advice/recommendations made to you in the course of taking instructions from you, as well as any SoA, or other relevant advice document they have provided to you. Your adviser is only required by law to keep each SoA for a period of 7 years from its acceptance by you.

Can you provide your adviser with instructions about how you wish to buy or sell financial products?

Yes. If you require a specific product or execution of a trade your adviser is able to do this for you. Generally you need to provide your instructions to your adviser in writing, email or by electronic means. You should retain a copy of these instructions. Your adviser will require you to acknowledge your instructions to them.

How does AVALONFS deal with the Anti-Money Laundering/Counter-Terrorism Financing Act 2006 as amended (AML/CTF Act)?

AVALONFS has an obligation under the AML/CTF Act to verify your identity before any financial products and/or services can be provided to you.

AVALONFS does this by acting as an agent for the relevant product suppliers.

You will need to present certain documentation to satisfy the customer identification requirements of the AML/CTF Act.

Privacy considerations

AVALONFS is committed to ensuring your privacy and security are protected through our Privacy Policy. A copy of the Privacy Policy is available from your adviser or from the AVALONFS website: <http://www.avalonfs.com.au/>. The Privacy Policy can be found on the front page of this site.

What Products can my adviser recommend?

Subject to having the appropriate authorisations as detailed specifically for your adviser on the last page of this document (FSG) as well as in the Certificate of Authorisations issued by AVALONFS, and any other prerequisites that apply. Subject to these authorisations, your adviser is able to recommend any product on the AVALONFS Approved Product List (APL).

If you are a new client with existing products within your portfolio, and you hold a product not on this list, your adviser may request that the product be added to the AVALONFS APL.

If AVALONFS is unable to place this product on the APL, you may be asked to sign a waiver should you wish to keep that product or sell down the product and purchase a similar product that is on the AVALONFS APL. If you request to sign a waiver to keep the product within your portfolio outside of our advice, this must be disclosed in the

new SoA with a note that this product is outside of the AVALONFS Approved Product List and was requested by the client and is outside of the scope of the advice provided by your adviser.

Your adviser must disclose all relevant remuneration relating to these product commissions and fees including any conflicted remuneration. Under the Code of Practice and certain circumstances your adviser may not be able to deal with a particular transaction and may suggest another adviser to deal with the particular circumstance.

Complaints procedure

What should you do if you have a complaint?

If you have a complaint about any service provided by your adviser, you should take the following steps:

1. Contact the Compliance Officer at AVALONFS to discuss your complaint. The Officer will acknowledge the complaint within 5 business days.
2. A response letter will be prepared and issued to you within 45 days detailing the complaint and advising you of your rights, any proposed solutions and further avenues should you not accept the resolution proposed.

If you are not fully satisfied with this response, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA) of which AVALONFS is a member.

You are able to lodge a complaint with AFCA directly online.

<https://www.afca.org.au>

Additionally, the Australian Securities and Investments Commission (ASIC) has a free call Infoline on 1300 300 630, which you may use to obtain information about any further rights you may have.

What compensation arrangements does AVALONFS have in place?

The Corporations Act 2001 (Cth) requires AVALONFS to operate a compensation arrangement which is designed to compensate retail clients for losses they suffer as a result of a breach by AVALONFS or its advisers of the obligations outlined in Chapter 7 of the Corporations Act.

To this end, AVALONFS has comprehensive Professional Indemnity insurance in place which covers both AVALONFS and our advisers (including the conduct of those advisers who are no longer authorised by AVALONFS, but were so at the time of the advice).

These compensation arrangements meet the requirements specified by the Corporations Act and ASIC from time to time.

Pre-requisite to further advice

Where your adviser provides you with further and/or additional advice, an updated FSG will be provided and where relevant as well as a Record of Advice if required.

Any questions?

Please contact your Advisor if you have any questions regarding this FSG or the investment and/or risk insurance products or services he/she provides.

This FSG should be retained by you in a safe place for future reference.

YOUR ADVISOR AND THEIR AUTHORISATIONS

Your adviser is **Norman Howe** whose company trades under the business name Strat X Advisory Pty Ltd. Both Norman Howe and Strat X Advisory Pty Ltd are authorised representatives of AVALONFS Pty Ltd, AFSL 437518. Their authorised representative number as issued by the Australian Securities and Investments Commission (ASIC) are 278771 for Norman Howe and 1276274 for Strat X Advisory Pty Ltd .

Taxation Practitioners Board (TPB)

AVALONFS is a Registered Member of the TPB. However, AVALONFS does not provide taxation advice and you should seek independent taxation advice from a taxation specialist (Refer Page 6 this document).

Your adviser is registered with the TPB. Number: 24917270

AUTHORISATION STATEMENT

Norman Howe is authorised to provide you with advice and deal in the following areas:

- Basic and non-basic deposit products
- Deposit products other than basic deposit products;
- Bonds and Debentures issued by a Government
- Life products including;
 - Investment life insurance products
 - Life risk insurance products such as term life, TPD, trauma and income protection, business expense, keyperson, shareholder insurance
- Interests in managed investment schemes including Investor directed portfolio services (i.e. master trust, wrap account)
- Securities
- Superannuation products including personal funds, employer funds, retirement savings accounts (RSA's)
- Self-Managed Superannuation Funds

YOUR ADVISER'S EXPERIENCE AND QUALIFICATIONS

Norman has operated in the Financial Services Industry for more than 30 years and is expert in investment financial planning, superannuation, risk insurance and estate planning.

Norman provides a professional service to his clients providing advice and strategies for Wealth Creation, Personal Insurances, Debt minimization, Estate Planning and Superannuation.

Norman holds the following qualifications:

- Master of Business Administration (Exec)
- Advanced Diploma of Financial Planner (Pinnacle)
- Diploma of Financial Planner (Tribeca)
- Self Managed Superannuation Fund Accreditation (Kaplan)
- ASX Listed Products accredited course including:
 - Direct equities
 - ETFs

Memberships:

- Association of Financial Advisers
- Taxation Practitioners Board

CONTACT Your Advisor

Address:	Level 4, The Park, 5 Talavera Road Macquarie Park NSW 2113
Postal:	Level 4, The Park, 5 Talavera Road Macquarie Park NSW 2113
Email:	nhowe@stratxadvisory.com.au

CONTACT AVALONFS Pty Ltd

Phone: 1800 681 438	Suite 12, Blaxland House 5 – 7 Ross Street Parramatta NSW 2150
Email:	admin@avalonfs.com.au
Web:	www.avalonfs.com.au

Privacy Policy

About this policy

AVALONfs Pty Ltd (AVALON) recognises the importance of privacy and is committed to protecting the privacy of all individuals when handling personal information.

This Privacy Policy explains in an open and transparent manner how AVALON will collect, hold, use, disclose, protect and otherwise handle your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

When you provide AVALON with personal information you consent to its use, disclosure and handling of your personal information in accordance with this Privacy Policy as amended from time to time.

Should you require a copy of this policy it is available for download or we can post you a copy at your request.

Your Personal Information AVALON collects and holds

AVALON will collect and hold your personal information for the purposes of providing advice in relation to the financial services and products we recommend to you and to identify who you are in relation to the Anti- Money Laundering Laws.

The kinds of personal information that we may collect and hold include your name, date of birth, tax file number, email address, home address, phone number and bank account details as well as financial information.

Where you do not provide us with all or some of your personal information that we request then we may not be able to provide you with our services or the services that we are able to provide may be limited in some way.

Electronic data capture

AVALON may use cookies, web beacons or similar technologies to collect de-identified information about your visits to our website www.avalonfs.com.au ("Website") for the purpose of improving your experience browsing our Website. As an example, should you visit our Website AVALON may collect information about your operating system, browser type, pages accessed, documents downloaded, any previous visits, any referring website, including dates and times.

If you disable cookies in your browsers our website may not operate as it should.

Our online enquiry form on our Website also collects the personal information you enter.

This information is used for the sole purpose of answering your enquiry.

Personal information collected and held

AVALON collects your personal information directly from you via our Authorised Representatives when you complete personal data forms and application forms and we may also collect data from the companies you may deal with through us.

Other ways we may collect your personal information includes in person or by telephone, letter, facsimile or email or by other electronic means.

AVALON may hold personal information collected in both physical and electronic storage facilities including paper-based files, computer and data servers both onsite and in the cloud.

How AVALON uses and discloses personal information

AVALON may use and disclose personal information collected and stored to enable us to provide the financial services and products to you and for other related legal purposes.

For example, we may use and/or disclose your personal information to:

1. verify your identity;
2. administer platforms, investments, insurances and other services we provide to you;
3. comply with laws, regulations, rules, directions or requests from AVALON's regulatory bodies and/or other government agencies;
4. comply with AVALON's own internal policies and procedures.

Where it is legal and necessary to do so, AVALON may disclose your personal information for the purposes described above to third parties such as our product suppliers, contractors, professional advisers, government agencies and regulators or parties involved in the management of your products and services. These third parties may be in other countries where laws in relation to the processing of personal information are not consistent with the Australian Privacy Principles or the Privacy Act.

Privacy Policy updates

We may update this Privacy Policy from time to time to take into account changes in our practices for the handling of personal information by publishing an amended Privacy Policy on our Website. You should regularly review the most recent version of this Privacy Policy available on our Website.

While AVALON may take steps to try and ensure that these third parties do not breach the Australian Privacy Principles in relation to your personal information, the overseas recipient may breach the Privacy Act and/or the Privacy Principles and this may be due to that countries own laws. In these cases, AVALON relies on the Australian product supplier to ensure compliance of their offshore branch or operation.

By providing us with your personal information you accept that we may make disclosures to overseas recipients on this basis.

AVALON will protect your personal information

AVALON will take all reasonable steps to protect your personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure using both physical and electronic security measures.

By providing us with your personal information over the Internet you accept that such information will be transmitted at your own risk as the security of such information cannot be guaranteed.

AVALON will not retain your personal information, unless required by law, if it is no longer needed for any purpose for which we may lawfully use or disclose it. However, under the Law we are obliged to retain certain data for up to seven (7) years after you cease to be a client of AVALON.

Access, correction and complaints regarding your personal information

You may request AVALON to provide you with access to any of your personal information held by us.

You should promptly notify AVALON if you become aware that any of your personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading.

If you have any concerns about whether AVALON has complied with this Privacy Policy or the Privacy Act you can raise your concerns with our Compliance Manager.

You can contact our Compliance Manager via email, fax, telephone or by post on the details set out below. Our Compliance Manager will investigate your complaint and advise you of the outcome.

If you are not satisfied with our response you can complain to the Office of the Australian Information Commissioner.

You can contact us by using the details below:

Email: admin@avalonfs.com.au

Phone: 1800 681 438

Address: Level 1, Suite F, The Octagon, 110 George Street Parramatta NSW 2160

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