



GODFREY PEMBROKE

Financial Advice Specialists



Important Information

This Financial Services Guide, which includes the Representative Profile presented with it, is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole Financial Services Guide (FSG), as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the '**Contact us**' section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the '**Contact us**' section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.



About Godfrey Pembroke

Financial freedom is about enablement.

The financial advice specialists at Godfrey Pembroke are self-employed business owners, so they understand the challenges of managing complexity. They can help you manage yours by establishing a strategic plan, guided by specialist area expertise. They will set in place the structures and disciplines to plan through and collaborate with you to build your life, to your design.

Our associations and relationships

At Godfrey Pembroke we pride ourselves on providing a comprehensive range of financial advice services. Our network of self-employed advisers bring specialist expertise, and they understand intimately how to manage complexity. The Godfrey Pembroke history is underpinned by unparalleled customer service and personal attention to our clients' needs.

Godfrey Pembroke is part of the National Australia Bank Limited ('NAB') group of companies ('NAB Group'). As the NAB Group is an issuer of financial products, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice).

Godfrey Pembroke financial advisers are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited).

These include products and services with the following branding:

- NAB, National
- MLC
- JANA
- JB Were
- Plum
- Pre Select Funds
- Private Investment Consulting
- WealthHub Securities
- Altrinsic Global Advisers
- Antares Capital
- Fairview Equity Partners
- Intermede Investment Partners
- Presima Inc
- Redpoint Investment Management



If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on Godfrey Pembroke's approved product list. These will include NAB Group products. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests. You can view a copy of our approved product list on the Godfrey Pembroke website (godfreypembroke.com.au).

NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by Godfrey Pembroke or its authorised representatives.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.



Payments and benefits we receive

At Godfrey Pembroke, you can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

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

If you are not already on a fee for advice package, you can move to this payment at any time.

Please refer to the “How we charge for our services” section of this FSG for further information.

Other payments we may receive

We will provide you with details of all fees, commissions, or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples. Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.



Non-monetary benefits

Godfrey Pembroke and your financial advice specialist keep a register detailing certain non-monetary benefits received eg benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist. Please be aware that Godfrey Pembroke may charge you for the cost of providing this information to you.

Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.



Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

Our complaints procedure

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

Phone:
1800 611 950 (free call)
Email:
advice.complaints@nab.com.au

In writing to:
Advice Dispute Resolution Team
Godfrey Pembroke Limited
Level 2, 105–153 Miller Street
North Sydney NSW 2060

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

Website: www.afca.org.au
Email: info@afca.org.au
Telephone: **1800 931 678**
(free call)

In writing to:
Australian Financial Complaints
Authority
GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint, but are no longer representatives of Godfrey Pembroke.



Privacy Notification

How we manage your personal information

To give you appropriate advice, our financial advice specialists will need to ask you about your current financial situation, what you are looking to achieve and other personal information.

Without this information, your financial advice specialist may not be able to provide you with advice relevant to your circumstances.

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification covers us and tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.

If you would like more information about our Licensee Godfrey Pembroke (and other members of the NAB Group), please also refer to the Godfrey Pembroke Privacy Policy available at godfreypembroke.com.au/nav_footer/privacy.

Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us; or
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.



What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information.

This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including Godfrey Pembroke and other members of the NAB Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Godfrey Pembroke and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities) where you have given your consent.



We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB and companies in the NAB Group may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid; or
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products).

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

Consent to marketing activity

We presume you consent to being contacted by us (including Godfrey Pembroke and other members of the NAB Group) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the '**Contact us**' section of this FSG). We will process your request as soon as practicable.



Gaining access to your personal information

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

Correcting your information

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

FURTHER INFORMATION

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at **oaic.gov.au**



GODFREY PEMBROKE

Financial Advice Specialists



Representative Profile

Version 14.0
28 May 2020

This document forms part of the Financial Services Guide Version 14 preparation date 01 April 2020 and is designed to clarify who we are, what we do, and aims to help you decide whether to use our services.

Who we are

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke Limited.

Anthony (Tony) Joseph Brosnan
Authorised Representative No. 241871

Hayden Elliott Shaw
Authorised Representative No. 1268933

The Financial Services that the above financial advice specialists offer are provided by **SA Portfolio Planners Pty Ltd**, ABN 49 008 163 522 Authorised Representative (AR) No. 242050 trading as First Principles Financial Planning

Godfrey Pembroke has authorised your advisers to provide you with this Financial Services Guide.



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Version 14.0
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What we do

We are authorised by Godfrey Pembroke Limited to provide financial advice in relation to:

- Wealth Accumulation
- Income and Asset Protection
- Tax Strategies
- Superannuation
- Retirement and Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Derivatives
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

Contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Address: Level 4
420 King William Street
Adelaide SA 5000

Phone: +61 8 8110 2373

Email: adelaide@firstprinciplesfp.com.au



Representative Profile

Version 14.0
28 May 2020

How we charge for our services

All fees and commissions are inclusive of GST. We have detailed a full range of fees below, but note that only fees applicable for the advice and services you choose will apply.

In complex cases the fees could be greater than those disclosed below. In these instances, we will inform you of the exact fee payable promptly in writing.

Note that we are now subject to requirements which mean we can only charge fees from your superannuation or pension account where the advice is in relation to that account. If you would like our fee deducted from your superannuation or pension account, we will discuss this with you to determine if it is appropriate for you.

Initial consultation	<p>Initial meeting \$660 for up to a 1 hour meeting.</p> <p>This will include collecting and processing information before and at the meeting, plus the time required after the meeting dealing with file notes for compliance and providing details of our understanding of your requirements and a written cost estimate for next steps (Scope of Advice).</p>
Due Diligence Process	<p>Where not all of the required information to prepare the Scope of Advice was available at the initial consultation, we would seek your instructions to undertake the required due diligence process. This is charged on a time used basis.</p> <p>Hourly rates as follows</p> <p>Principal Adviser \$ 440</p> <p>Associate Adviser \$ 320</p> <p>Paraplanner \$ 220</p> <p>Client Service \$ 165</p> <p>Administration \$ 90</p>
Advice preparation	<p>Statement of Advice preparation fees will depend on the extent and complexity of the advice.</p> <p>So that you are always clear about costs, in all cases we will simply agree a specific project fee or an hourly fee basis with you prior to commencing work.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations. Accordingly, the minimum fee charge is \$1,650 while the maximum fee \$22,000.</p> <p>However, for particularly complex scenarios, the advice preparation fee may be greater than the maximum.</p> <p>The actual fee per client will be quote per plan. Complex advice requirements, such the use of trusts and ownership structures, SMSF, executive share plan or multiple investment entities, overseas assets and incomes, etc., may result in higher fees than the maximum.</p>



Representative Profile

Version 14.0
28 May 2020

How we charge for our services (cont.)

All fees and commissions are inclusive of GST. We have detailed a full range of fees below, but note that only fees applicable for the advice and services you choose will apply.

In complex cases the fees could be greater than those disclosed below. In these instances, we will inform you of the exact fee payable promptly in writing.

Implementation	<p>If we assist you to Implement advice provided to you, or assist you by providing other services, there may be a fee applicable for this service.</p> <p>The fee will depend on a number of factors, including the complexity of the advice and the anticipated work involved. In some cases, we will incorporate this cost in the fee for our advice and if so we will state this.</p> <p>So that you are always clear about costs, if an Implementation fee is applicable, we would normally quote a specific fee in writing in our advice to you. This allows you to have a clear understanding of the cost of implementing our advice before making a decision to do so. In all cases we would agree a fee with you prior to commencing work.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fee that may be charged across those widely varying situations. Accordingly, the minimum fee charge is \$Nil while the maximum fee \$22,000.</p> <p>However, for particularly complex scenarios, the advice preparation fee may be greater than the maximum.</p>
Ongoing fee for advice	<p>If you pay a fee for the Ongoing Review of your financial planning strategy, the ongoing service fee is based on the complexity of ongoing advice, the services provided, and the anticipated work involved.</p> <p>So that you are always clear about costs, if an Ongoing Review fee is applicable, we would normally quote a specific fee in writing in our advice to you. We would also provide you with a detailed, written Ongoing Client Service Agreement. This allows you to have a clear understanding of the cost and extent of our service before making a decision to do so. In all cases we would agree a fee with you prior to commencing work.</p>



Representative Profile

Version 14.0
28 May 2020

How we charge for our services (cont.)

All fees and commissions are inclusive of GST. We have detailed a full range of fees below, but note that only fees applicable for the advice and services you choose will apply.

In complex cases the fees could be greater than those disclosed below. In these instances, we will inform you of the exact fee payable promptly in writing.

<p>Ad hoc advice</p>	<p>Where you are a new client seeking limited advice, a second opinion or other matters not requiring comprehensive advice, or if you are an existing client and seeking advice which falls outside the scope of recent advice, we will provide advice on an ad hoc basis. This is charged on a time used basis.</p> <p>We offer hourly rates as follows</p> <p>Principal Adviser \$ 440 Associate Adviser \$ 320 Paraplanner \$ 220 Client Service \$ 165 Administration \$ 90</p>
<p>Services</p>	<p>Where you are seeking assistance that doesn't form part of our implementation of advice or does not require advice, we would regard this as the provision of services. This may involve attendance at meetings, liaising and instructing other professionals or service providers on your behalf or resolving issues or matters on your behalf. This is charged on a time used basis.</p> <p>We offer hourly rates as follows</p> <p>Principal Adviser \$ 440 Associate Adviser \$ 320 Paraplanner \$ 220 Client Service \$ 165 Administration \$ 90</p>
<p>Execution only service</p>	<p>Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you. This is charged on a time used basis.</p> <p>We offer hourly rates as follows</p> <p>Principal Adviser \$ 440 Associate Adviser \$ 320 Paraplanner \$ 220 Client Service \$ 165 Administration \$ 90</p>



Representative Profile

Version 14.0
28 May 2020

How we charge for our services (cont.)

Insurance products

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.



Representative Profile

Version 14.0
28 May 2020

Referrals

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

We have referral arrangements in place with third party providers. If we refer you to one of these providers we may receive a payment, fee, commission or other benefit from those providers.

Details of these arrangements are set out in the table below and specific details of any referral payments we may receive will be provided in our advice documents to you. Alternatively, you can request further details about our referral arrangements prior to us providing you with financial advice.

Table - Details of referral arrangements in place:

Name of referral partner	Services	Payment we will receive for referral	Example
PLAN Financial Partnerships (SA) is a business name of Advantedge Financial Solutions Pty Ltd ABN 64 117 551 292	Mortgage Broking	50% of initial fee earned by Mortgage Broker 75% of trail fee earned by Mortgage Broker	<i>Loan:</i> If you established a loan for \$100,000 and if the maximum rate was payable, we could receive up to \$385 upfront and up to \$206.25 per annum thereafter.
A NAB Group Company			

Please note that Godfrey Pembroke Limited is not responsible for the advice and services provided by these providers.



Representative Profile

Version 14.0
28 May 2020

Benefits we may receive

We have detailed below how certain product purchases may benefit our business.

Business Equity Valuation (BEV)

In the event of our death or permanent disablement, or if we were to leave the financial planning industry, Godfrey Pembroke provides a buyer of last resort option called BEV. This helps manage the transition of ownership to ensure you continue to receive advice.

The value of a sale under BEV is based on a multiple of ongoing revenue received by the business on an annual basis. The multiple can range from 2.5 to 4 depending on the proportion of the ongoing revenue that comes from clients who hold MLC group financial products.

Here are some examples to help you understand the potential benefit to us of our clients holding MLC group product:

- If the ongoing revenue of the business was \$100,000 and 50% of our clients held MLC group products, the sale value for the financial planning business would be between \$250,000 and \$350,000.
- If the ongoing revenue of the business was \$100,000 and 85% of our clients held MLC group products, the sale value for the financial planning business would be up to \$400,000

Importantly, BEV is subject to us meeting certain compliance requirements and standards.



GODFREY PEMBROKE

Financial Advice Specialists

Godfrey Pembroke Limited

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T: 1800 023 867

www.godfreypembroke.com.au