

Financial Services Guide

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Licensee: SGN Financial Pty Ltd
(AFSL 490523)

This Financial Services Guide (FSG) is authorised for distribution by SGN Financial Pty Ltd.

Authorised Representatives:

- Sterling Group & Associates Pty Ltd trading as Signate Private Wealth (CAR 1269185)
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- Todd Hammond (AR 1004725)
- Luke Butcher (AR 1282284)
- Sena Pona (AR 1294592)
- Ian Davidson (AR 0230154)
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Contact Details

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Why am I receiving this document?

This Financial Services Guide (FSG) will help you decide whether to use the services that are offered by Sterling Group & Associates Pty Ltd trading as Signate Private Wealth.

It contains information about:

- The services we offer and their cost.
- Any conflicts of interest which may impact the services.
- How we are remunerated.
- How we deal with complaints if you are not satisfied with our services.

In this document 'we' or 'us' refers to SGN Financial Pty Ltd, Navegar Portfolio Management Pty Ltd, and Sterling Group & Associates Pty Ltd as the context applies.

SGN Financial Pty Ltd

SGN Financial Pty Ltd holds an Australian Financial Services Licence (490523) which has been issued by the Australian Securities and Investments Commission (ASIC).

Legal Notice - 'Lack of Independence'

The financial services laws say you cannot call yourself independent (or similar words) if, among other things, you receive commissions that aren't rebated in full to your clients. Because, in some circumstances, we are paid commissions (which are built into the cost of the product and are not an additional cost to you) where we recommend and implement insurance products and because entities associated with the licensee are paid fees for the investment management services relating to managing the Navegar managed accounts based on a percentage of the amount of funds in those accounts we are required to provide this notice to you and are not able to refer to ourselves as independent.

We are partially owned by an entity in the Ironbark Asset Management group of companies. Ironbark issues a range of financial products that we may recommend in respect of the provision of financial services to our clients.



Sterling Group & Associates Pty Ltd trading as Signate Private Wealth and Your Financial Adviser

Sterling Group & Associates Pty Ltd trading as Signate Private Wealth has been appointed as a Corporate Authorised Representative of SGN Financial Pty Ltd.

Your Financial Adviser will be one or a combination of the listed authorised representatives of SGN Financial Pty Ltd as detailed above. When providing services to you, your Financial Adviser will act on behalf of SGN Financial Pty Ltd who is responsible for the services that we provide.

Associated Businesses

Peter Stevenson and David Murray are Directors of Navegar Portfolio Management Pty Ltd and Directors of SGN Financial Pty Ltd.

Sterling Group & Associates Pty Limited (SGA) (ABN 55 628 707 460), Cervus Private Wealth (ABN 54 609 367 517) and Ridgeman Bennett McLeod Pty Ltd (ABN 87 160 253 396) trading as Signate Private Wealth, is a wholly owned subsidiary of Signate Group and Associates Pty Limited (ABN 28 663 849 205) (SIG).

Navegar Portfolio Management is fully owned by SGN Financial Pty Ltd.

Peter Stevenson, Craig Abela, Todd Hammond, David Murray, Andrew Stevenson, Greg Rodham, James Sali, Ben Woolvett, Andrew Bennett, David Black, Simon Parker and Rebecca Brett are the beneficial owners of the shares of Signate Group & Associates Pty Ltd.

Signate Lending Services Pty Limited (ABN 25 674 721 816) is a wholly owned subsidiary of Signate Group and Associates Pty Limited (ABN 28 663 849 205) (SIG). Any services delivered by Signate Lending Services are delivered under a separate licensing regime, and not licensed by SGN Financial Pty Ltd. As a director of Signate Lending Services Pty Limited Peter Stevenson, Craig Abela, Andrew Stevenson and Greg Rodham may be entitled to receive remuneration from profit share, distributions, dividends and/or salaries.

An Ironbark-related entity (Ironbark Asset Management Pty Ltd) is the Responsible Entity and Investment Manager for the Navegar Managed

Accounts and other products) holds a minority stake in Signate Group & Associates Pty Ltd.

Peter Stevenson and David Murray are Directors of Rivwest Finance Ltd (ABN 85 073 358 666). Rivwest Finance Limited is a majority-owned subsidiary of Signate Group and Associates Pty Limited (ABN 28 663 849 205) (SIG). Rivwest provides lending and finance services under its own Australian Credit Licence and operates independently of SGN Financial Pty Ltd's financial services licence. Directors and shareholders of Signate may be entitled to receive financial benefits from the operations of Rivwest, including dividends, profit shares or other remuneration.

Peter Stevenson and David Murray are Directors of Signate Adelaide Pty Ltd. Signate Adelaide is a wholly owned subsidiary of Astute Private Wealth Pty Ltd.

Peter Stevenson, David Murray and Ben Woolvett are Directors of Astute Private Wealth Pty Ltd. Astute Private Wealth Pty is a wholly owned subsidiary of Signate Group & Associates Pty Ltd.

What services do we provide?

We are authorised to provide personal advice and services in the following areas:

- Superannuation and SMSF
- Retirement planning
- Portfolio Management
- Personal risk insurance
- Managed investments
- Securities (direct shares)
- Derivatives
- Margin Lending facilities
- Managed Discretionary Accounts

What financial products are we authorised to provide advice on?

SGN Financial Pty Ltd is authorised by its AFSL to provide product advice for the following classes of financial products:

- Deposit and payment products, limited to
 - Basic deposit products
 - Deposit products other than basic deposit products

- Debentures, stocks, or bonds issued or proposed to be issued by a government.
- Life insurance products
- Superannuation
- Interests in managed investment portfolios including
 - Investor directed portfolio services
 - Retirement Savings Accounts
- Securities (direct shares)
- Derivatives
- Managed investment schemes including investor directed portfolio services.
- Margin Lending Facilities.

How do we select the products we use?

Our Investment Committee, made up of both internal and external experts, research a range of products to be placed on our Approved Products List (APL). This APL is not an exhaustive list of all products available; it is limited to those we research and approve.

When providing personal advice, we'll only recommend a product if we're satisfied it is in your best interests, and it is appropriate for you. In doing so, we'll conduct a reasonable investigation into products, depending on your personal circumstances, which may include investigating and recommending products which are not on our APL.

The financial advice process

We recognise that the objectives and personal circumstances of each client are different. What is right for one client may not be right for another.

Where we provide personal advice, we will listen to you to understand your objectives and circumstances. We will also ask questions to make sure we address all issues.

When we first provide personal advice to you it will be explained thoroughly and documented in a Statement of Advice (SoA) which you can take away and read.

The SoA will explain the basis for our advice, the main risks associated with the advice, the cost to you of implementing the advice, the benefits we receive and any conflicts of interest which may influence the advice.

For financial products we will provide you with a Product Disclosure Statement. This contains information to help you understand the product being recommended.

At all times you are able to contact us and ask questions about our advice and the products we have recommended.

You can provide instructions to us in writing, via phone or via email/fax.

We may provide further advice to you to keep your plan up to date for changes in your circumstances, changes in the law and changes in the economy and products.

If we provide further advice, it will typically be documented in a Record of Advice which we retain on file. You can request a copy of the RoA document at any time up to 7 years after the advice is provided.

Fees

All fees are payable to SGN Financial Pty Ltd. The fees received by SGN Financial Pty Ltd are forwarded through to Sterling Group & Associates Pty Ltd trading as Signate Private Wealth after deduction of an amount to cover Licensee expenses.

The following is a list of potential fees and is not meant to show the actual fees you will pay. We will confirm which fee type and amount with you individually. You may request particulars of any of these fees which will also be disclosed in writing to you if applicable.

Annual Engagement

We may offer an annual engagement, where we price our advice and services based on an agreed scope of work for that service period. We provide a Letter of Engagement to reflect this agreement which outlines our agreed scope of works and where identify the advice needs on an annual basis.

We charge an annual fee to project manage the advice and services agreed to. Our service terminates annually, and a new annual agreement is determined by both parties each year.

Plan Preparation Fee

The Plan Preparation fee includes all meetings with you, the time we take to determine our advice and the production of the SoA.

The Plan Preparation Fee is based on the scope and complexity of advice provided to you. We will agree the fee with you at our first meeting.

Plan Implementation Fee

If you decide to proceed with our advice, we may charge a fee for the time we spend assisting you with the implementation. We will let you know what the fee will be in the SoA.

We may also offer Ongoing Services Fees

We may also provide you with ongoing advice services. For any such services an Ongoing Fee Arrangement may be put in place. Ongoing fees will depend on what ongoing service we provide to you. Ongoing Service fees are typically a percentage of your portfolio value, an agreed fixed fee which is paid monthly or a percentage of the transaction value.

Your adviser will discuss these various fee arrangements with you.

The services and fees will be set out in the SoA or RoA that we provide to you as well as the ongoing services agreement.

Commissions

We may receive commissions and other benefits from some product and service providers.

The commission will vary depending on the product or service recommended. You will be advised of the exact amount in the SoA or RoA.

Insurance Commissions

If we recommend that you acquire a personal or business life insurance product, and you acquire that product, we will receive initial and ongoing commissions.

The initial commission is paid in the first year by the product issuer to SGN Financial Pty Ltd.

Ongoing commissions are payments paid by product issuers to SGN Financial Pty Ltd in the years after the first year.

If you initiate an increase to your cover, we may receive initial and ongoing commissions on the increase to your policy cost. The ongoing commission on a client-initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is higher than the ongoing commissions, the maximum commission that we may receive is set out in the table below.

Date a new product is issued	Initial commission (% of annual policy cost or increase incl. GST)	Ongoing commission p.a. (% of annual policy cost or increase incl. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 – 121%	0 – 33%
1 January 2018 – 31 December 2018*	0 – 88%	0 – 22%
1 January 2019 – 31 December 2019*	0 – 66%	0 – 22%
From 1 January 2020*	0 – 66%	0 – 22%

* Sterling Group & Associates trading as Signate Private Wealth may receive the pre-1 January 2018 commission rates above from the product issuer if:

- Your policy was issued before 1 January 2018 and you exercise an option to establish new or additional cover under your policy after 1 January; or
- Your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct and administrative error.

Example:

You have an existing policy with us, issued in 2017, and in 2018 you decide to increase the cover on that policy with a corresponding increase in policy cost of \$100 pa. We may receive up to \$121 (121% incl. GST) as initial commission on that increase and may pass up to \$121 pa to us.

The ongoing commission payable to us in respect of this increased policy cost may be up to \$33 (33% incl. GST). Or, we recommend an insurance product to you and it is issued on 2 April 2018. The first year's insurance premium is \$10,000, the commission will generally be no more than \$8,800 (88% incl. GST).

In subsequent years with this example the commissions will be between \$0 to \$2,200 (22% incl. GST). If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), we may receive up to 35% (incl. GST) of your annual policy cost.

This percentage may differ depending on the product issuer and the individual insurance contract. This will be discussed and disclosed in writing with you before you proceed.

Legacy Investment Commissions

We may receive a commission payment from some investment providers where the product was purchased prior to 1st July 2013. This will be based on your account balance and will continue to be paid for as long as you hold the investment. This fee will not usually exceed 0.05% of your account per annum. For example, if you have \$10,000 invested, we may receive a commission of up to \$50 per annum.

Placement Fees

We may receive one-off placement fees where you invest in some listed investments (eg bank issued hybrids and IPO's). These will be paid by the issuer of the investment and will typically be a set percentage of the investment amount.

What amounts do our advisers and other related entities receive for providing financial services?

All authorised representatives receive a salary as employees of Sterling Group & Associates trading as Signate Private Wealth.

Peter Stevenson, Craig Abela, and David Murray are directors of Sterling Group & Associates Pty Ltd trading as Signate Private Wealth. The Directors are not paid Directors Fees. Sterling Group & Associates Pty Ltd trading as Signate Private Wealth distributes company profits to shareholders periodically.

Fees we pay referrers

If you have been referred to us by a person or company outside SGN Financial Pty Ltd, we may pay the referrer a fee. Likewise, if we refer you to a person or company outside SGN Financial Pty Ltd we may receive a referrer fee.

Other Benefits

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes.

A copy of the register is available on request.

Professional Indemnity Insurance

SGN Financial Pty Ltd is required to comply with the obligations of the Corporations Act and the conditions of its licence. This includes the need to have adequate compensation arrangements in place with a Professional Indemnity insurer. These arrangements satisfy the requirements of Section 912B of the Corporations Act.

Conflicts of Interest

Sterling Group & Associates Pty Ltd trading as Signate Private Wealth has negotiated a fee discount for the BT Panorama, HUB 24, Macquarie and Wrap platforms.

Your financial adviser may recommend investments in shares that they hold or may hold in the future. You will be advised where a conflict of interest may exist and how the conflict will be managed.

Navegar is paid a fee for providing the Managed accounts. This fee is shared between Navegar to cover costs related to the provision of such portfolios and to your advisor in relation to advice provided in respect of that portfolio. Navegar Portfolio Management provides administration and other services to the Navegar Managed Accounts. A fee to cover these services is charged within the Navegar Managed Accounts. The fee is 0.02% per annum of funds invested (not including cash balances) by you in those accounts. The fee is charged on a cost recovery basis only (that is, it is not set up to profit Navegar, SGN or its associated entities); it is collected by Ironbark (as Responsible Entity) via the managed accounts and ultimately received by SGN Financial. No part of the fee is paid to your adviser. For example, if you invest

\$100,000 in those accounts, the fee would be \$20 per annum. The fee is reviewed periodically.

Making a Complaint

We endeavour to provide you with the best advice and service at all times and will seek to resolve your concern within 21 days.

If you are not satisfied with our services, then we encourage you to contact us. Please call us or put your complaint in writing to SGN Financial Pty Ltd.

C/O – Mr David Murray
Po Box 9222
Brighton, VIC 3186
dmurray@sgnf.com.au

If you are not satisfied with our response or it is not resolved within 30 days, you can refer it to the Australian Financial Complaints Authority (AFCA).

Please contact AFCA in the following ways:

Writing to:

Australian Financial Complaints Authority
GPO Box 3 , Melbourne VIC 3001

Email: info@afca.org.au

Phone: 1800 931 678

Website www.afca.org.au

This service is provided to you free of charge.

Your Privacy

We are committed to protecting your privacy.

We comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

We have a Privacy Policy which sets out how we collect, hold, use and disclose your personal information. It also sets out how you can access the information we hold about you, how to have it corrected and how to complain where you are not satisfied with how we have handled your personal information. Our full Privacy Policy is available on the Signate Private Wealth, website signateprivate.com.au