

FINANCIAL SERVICES GUIDE

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bombora

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This Financial Services Guide has been authorised for distribution by the authorising licensee:

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PART 1

This Financial Services Guide ('FSG' or the 'Guide') provides you with important information about Bombora Advice Pty Ltd ('Bombora' or 'Licensee'), and its Authorised Representatives, who will provide you with the financial services described in this Guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in this Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your Adviser.

This Guide consists of two parts. Part 1 of this Guide contains important information about:

- the financial services we offer as Authorised Representatives of Bombora;
- Bombora as the holder of an AFSL;
- the financial services that Bombora offer;
- the process we follow to provide financial services;
- how we, our associates, and Bombora are paid;
- any arrangements which may influence our advice to you;
- how we and Bombora protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

Part 2 of this Guide is an Adviser Profile and includes information on the services we are authorised to provide on behalf of Bombora. References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either Bombora or your 'Authorised Representatives' of Bombora, as the context requires.

Part 1 contains the following sections:

- Financial Services Guide (Section 1);
- Privacy Statement (Section 2); and
- Are you satisfied? (Section 3).

You must read each of these sections in conjunction with Part 2, which provides more detail to allow you to make an informed decision about whether to use the financial services we offer.

Together, these documents form the complete FSG which we, as Authorised Representatives, are required to provide.

About Bombora

Bombora Pty Ltd was formed in July 2013 by a group of like-minded Advisers who wanted to form a business to provide the highest levels of professional advice to their clients in a business relationship which matched their collective views on advice preparation, advice delivery and client service.

Bombora is a privately owned licensee with a network of Advisers operating nationally.

Bombora holds AFSL No. 439065 issued by the Australian Securities and Investments Commission and is a Professional Partner of the Financial Planning Association of Australia (FPA), and a member of the Association of Financial Advisers Ltd. As a member of these bodies, we adhere to set standards in terms of ethics, conduct and continuing education.

As an Authorised Representative, we act on behalf of Bombora when providing the financial services we are authorised to provide under Bombora's AFSL. Further information on these services is set out in Part 2 of the FSG, Adviser Profile.

Bombora Advice Pty Ltd Registered Office:

Level 2, 406 Collins Street
Melbourne VIC 3000
Ph: 1300 653 097
Fax: (03) 9602 4243
E: info@bomboraadvice.com.au

Bombora Advice Pty Ltd Corporate Office is:

Suite 12, 333 Canterbury Road
Canterbury VIC 3126
Ph: 1300 653 097
Fax: (03) 9602 4243
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SECTION 1 FINANCIAL SERVICES GUIDE

What other information should you consider before deciding whether to proceed with our recommendations?

If you receive personal financial advice this will be documented in a Statement of Advice (SoA), or in specific circumstances a Record of Advice (RoA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.

Who provides the financial services described in this FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of Bombora.

Part 2 of this Guide contains further details about your Adviser, our experience, qualifications and professional memberships.

Who is responsible for those financial services?

As the holder of an AFSL, Bombora is responsible for the financial services we provide to you. Bombora acts on its own behalf when these financial services are provided to you.

In relation to the financial services offered in this FSG, Bombora, as the holder of an AFSL, does not act on behalf of any other person or licensee. Bombora is only responsible for the services offered in this FSG.

The law requires Bombora to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by Bombora and/or its Authorised Representatives. Bombora has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

What financial services do we offer?

Bombora is able to provide financial product advice and to deal in a wide range of products (unless otherwise stated in Part 2 of this Guide) including:

- Deposit products;
- Government debentures, stocks or bonds;
- Life investment and life risk products;
- Managed investment schemes including investor directed portfolio services;
- Standard margin lending facilities;
- Retirement savings account products;
- Securities (e.g. shares); and
- Superannuation products.

Some of the services you are able to access through Bombora include:

- Personal and business insurance advice
- Superannuation and rollover advice
- Retirement planning advice
- Investment planning advice; and
- Portfolio review services

Bombora is registered with the Tax Practitioners Board as a Tax (Financial) Adviser. A Tax (Financial) Advice service is:

- Provided in context of the advice provided by an Adviser under an AFSL; and
- The part of financial advice that interprets and applies the tax laws (including tax, superannuation and SMSF laws) to your personal circumstances.

Whilst Bombora is registered as a Tax (Financial) Adviser, we are not registered tax agents and only provide services directly related to the nature of the advice provided to you. We recommend you consult with a registered tax agent to confirm your taxation position.

Bombora also has access to a referral network who provide advice on tax and estate planning. Where required, these specialist areas of advice will be provided only by referral. Whether you use our referred partner, or a professional that you currently have an involvement with, they will be responsible for the advice provided to you. If you require advice on a wider range of products or complex issues you may be referred to another financial services provider.

What products are available?

A range of financial products offered by many leading financial product providers are available for recommendation by us. Details of the available investment products we can recommend are contained within our Approved Product List (APL).

We have an open APL when providing risk insurance advice, meaning we are able to provide advice on all personal and group risk insurance products.

Research houses provide us with financial product research, which is used to carefully select and maintain an extensive list of Approved Products for us to select from.

We will only recommend a product to you after considering its appropriateness to your individual objectives, financial situation and needs. The recommendations will be made after conducting an investigation into the financial products and may require us to investigate and consider a financial product which is not on the APL.

Bombora has established a Risk Partner Program with various life insurance underwriters, which provides support and resources to assist us in the delivery of life insurance advice.

How do we ensure that the advice we give you suits your needs and objectives?

To ensure your Adviser provides personal advice that is appropriate, we firstly need to understand your objectives, financial situation and needs.

Your Adviser (referred to as 'we' below) will follow a step-by-step process as outlined below:

- 1) We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services we can offer.
- 2) We will collect all the information we need from you, including your objectives, financial situation and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing all of this information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter you request. Please ensure you keep your Adviser updated with any changes to your personal situation including matters of health and finance.
- 3) We will help you identify your goals and may discuss your attitude towards investment risk.
- 4) We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where we recommend a financial or insurance product we will also conduct a reasonable investigation into that product, ensuring it is suitable to implement the recommended strategy. Based on these and other considerations, we will prepare and present to you a written SoA, or in some cases depending on the circumstances, an RoA. We will explain in the SoA (or RoA) the basis for the advice, and any remuneration, benefits or associations which could have influenced the advice. Where we recommend financial or insurance products, we will provide you with a PDS or other disclosure documents containing information about each product recommended, to help you make an informed decision about whether to invest in or acquire that product.

- 5) We will discuss our recommendations with you, make any changes you require and ask you whether you would like us to implement those recommendations on your behalf.
- 6) Carefully consider our advice, including the implications and risk associated with our recommendation before making your decision to proceed.
- 7) We will meet with you periodically to review your financial circumstances and/or insurance needs. In some circumstances we may enter into an ongoing advice service arrangement, this will be documented in an Ongoing Advice Service Arrangement letter and/or SoA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your arrangement with you at a minimum of every two years.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

Where general advice is provided, we will not provide you with personal advice via a SoA or RoA. General advice is received by attending one of our seminars or receiving one of our newsletters. If you would like further information regarding the general advice and how it may benefit you, please contact your Adviser.

What documents do you get if we provide further advice?

Where we provide further advice and your circumstances have not significantly changed, we will provide you with a Record of Advice (RoA).

In the event your circumstances have changed significantly from our previous advice, we will provide you with a SoA.

How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out in Part 2 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.

Other services

We may provide services other than financial planning and personal risk insurance services. For example, we may also act as your accountant or legal adviser, or advise you on real estate investments, health insurance or your finance needs. While we may provide these other services, you should understand that these other services are not provided under Bombora's AFSL and Bombora does not train, support or supervise the provision of these other services and has no responsibility in relation to these services.

Examples of the services which Bombora is not responsible for include:

- general insurance services (e.g. car, home, landlord insurance);
- real estate and direct property advice;
- taxation services, such as completion of tax returns;
- accounting and audit services;
- legal services;
- credit activities;
- private health insurance;
- consulting services; and
- administration and compliance of Self-Managed Superannuation Funds.

How are we paid for our services?

We and Bombora may receive:

- fees paid by clients;
- commissions paid by product providers;
- other payments by product providers; and
- other benefits.

Fees and commission payable (as directed by your Authorised Representative) to Bombora, Authorised Representatives, Corporate Authorised Representatives or to any other approved party. We may receive up to 100% of any fees and commissions received by Bombora.

Details of any fees, commission or other benefits that we, Bombora or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SoA or RoA when personal advice is given.

What type of fees, commissions, payments and other benefits do we receive for our services?

If the fees, commission or other benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after. If you receive general advice you may request particulars of the fees, commissions and other benefits that we may receive, within a reasonable time after this FSG is given to you.

The types of fees, commissions and other benefits that may be received by us and by Bombora include the following:

SERVICE FEES

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination or part of, any of these fees.

Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. We will discuss these fees with you and gain your agreement to the fees before we provide you with advice.

Ongoing advice fees

We may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be agreed with you and is either a set amount, or an amount based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio and circumstances.

Referral fees

If we refer you to another business to provide you with services, we may receive referral fees. Those fees may vary according to the party to whom we are referring, and the products involved. We will provide written notification to you if we are likely to receive referral fees for referring you to another service provider.

Payment methods

Our fees are either invoiced to you directly or deducted from your investments, paid by product providers or a combination of these methods.

Where it is debited from your investments, it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

Commissions

Initial and ongoing commissions from insurance providers may be received by Bombora. These commissions are paid to Bombora by the company that issues the product that Bombora's Advisers recommend to you and are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer to Bombora. Ongoing commissions are payments paid by product issuers to Bombora in the years after the first year. If you initiate an increase to your cover, Bombora may receive initial and ongoing commissions on the annual 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 equal to the ongoing commissions (as a percentage of your policy cost), Bombora may receive up to 80% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that Bombora may receive is set out in the table below.

Date a new product is issued	Initial Commission (% of annual policy cost Or increase excl. GST)	Ongoing Commission pa (% of annual policy cost Or increase excl. GST)
January 2018 - 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 - 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%

* Bombora 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 2018; or
- > your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

Example

We recommend an insurance product to you and it is issued on 2 February 2018. The annual policy cost is \$450. Bombora may receive up to \$360 (80% excl. GST) as an initial commission and may pass up to \$360 to us. Assuming the policy cost stays the same each year, Bombora may receive up to \$90 pa (20% excl. GST) as an ongoing commission and may pass up to \$90 pa to us.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to Bombora in respect of this increase will be \$80 (80% excl. GST) as the increase has occurred in 2018. The ongoing commission payable to Bombora in respect of this increased policy cost will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to Bombora in respect of this increase will be \$60 (60% excl. GST). The ongoing commission payable to Bombora in respect of this increase will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you. Where personal advice is provided to you, you'll also find details of the commission that Bombora and we are entitled to receive if you decide to purchase a life insurance product, in your SoA or RoA.

INSURANCE PARTNER PROGRAM

In addition, Bombora may receive benefits as part of the Insurance Partner Program in the form of education, training and other support and resources to assist in the delivery of life insurance advice. Participants in the Insurance Partner Program may pay a fee to Bombora. Participants may be given the opportunity to provide training about their life insurance products. The total amount of fees, or the fees that may be paid by each individual life insurance product provider, will depend upon the commercial arrangements that may be negotiated from time to time between Bombora and each product provider. These payments will not change the amount of the policy cost payable by you.

Bombora or its Advisers may be entitled to receive partnership payments from product issuers. This may be by way of additional commission. Payments are dependent on in force premiums as at 31 December 2017 taking into account premium increases and lapse rates for Bombora and its Advisers collectively or individually.

Bombora and your Adviser may have these types of arrangements in place with any product issuer on its APL. A copy of our APL is available on request from your Adviser.

Does Bombora charge any fees?

Bombora will not charge you any additional fees. Bombora will remit to its Advisers all fees and commissions we receive for the advice and services provided to you. Bombora does charge your Adviser an annual fee for licensing and support services, which will be collected from your Adviser on a monthly basis.

Other benefits

From time to time we may accept alternative forms of remuneration from product providers or other parties. These benefits may include benefits 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 over \$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 for a small charge.

Will any other parties benefit from the financial services offered in this FSG?

Our Authorised Representatives may be associated with other services providers outside of the services they are authorised to provide under Bombora's AFSL. When these products or services are provided to you, details of these fees or benefits and how they are calculated will be disclosed in the relevant PDS or other disclosure document that will be provided to you.

What arrangements may influence our advice to you?

Bombora's Approved Product List includes a range of financial products from product providers not associated with Bombora. We will assess your individual needs and circumstances, ensuring we recommend products that are in your best interest. After completing our research, if we believe a product is better suited to your individual needs and circumstances that is not on our approved product list, we will follow our non approved product process.

Neither Bombora nor our Advisers are associated with any financial product issuer. However, Bombora does have an agreement with MLC whereby MLC provides Bombora with a range of back office support services to assist us in running our AFSL. These support services include, software, product research, compliance and other related services. MLC is a part of the NAB Group of companies.

Bombora has an agreement with BT Select to provide Bombora with ongoing Governance support in the form of training, risk and compliance framework assistance, compliance policies and procedures. BT Select is part of the Westpac Group of companies.

Bombora has an agreement with Assured Support for our audits, which is required to maintain a licence with ASIC.

Any other relationships or associations we have that may influence our advice to you will be disclosed in Part 2 of this FSG.

What fees do we pay to someone who refers you to us?

If you are referred to us we may pay the referrer a fee. We may also provide the referrer with gifts such as branded promotional items, hampers or gift vouchers.

The fee varies according to the referrer and financial products involved.

The fee may be a percentage of our fees, a percentage of the total amount invested paid through the referral, or a flat fee. We may pay these fees upfront when the financial service is provided, or the financial product is provided, or periodically as ongoing fees.

SECTION 2 PRIVACY STATEMENT

Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and to help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

Collecting and disclosing your personal information

We may disclose your personal information to members we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business. We may also disclose your personal information to third parties such as a complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy policy.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent to these disclosures.

Bombora is also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes. We may be required to obtain information about you at the time of providing financial services to you, and from time to time in order to meet our legal obligations.

We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

Other important information

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy.

Our privacy policy is available at www.bomboraadvice.com.au. It covers:

- how you can access the personal information we hold about you and ask for it to be corrected;
- how you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and;
- how we collect, hold, use and disclose your personal information in more detail.

We will update our privacy policy from time to time.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.

Definitions

"We", "our", "us" means Bombora Advice Pty Ltd and its Authorised Representatives

SECTION 3 ARE YOU SATISFIED?

What to do if you have any concerns about our services

Both we and Bombora endeavour to provide you with quality financial and personal risk insurance advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

- 1) Contact your Adviser first about your concern.
- 2) If your concern is not resolved to your satisfaction, you may contact Bombora by:

Writing:

General Manager
Bombora Advice Pty Ltd
Level 2, 406 Collins Street
Melbourne VIC 3000

Email: info@bomboraadvice.com.au

Phone: 1300 653 097

- 3) If your concern is not resolved, or if you are not satisfied with the decision, you may contact the Australian Financial Complaints Authority (AFCA).

AFCA independently and impartially resolves disputes between consumers and financial service providers.

You may contact AFCA by:

Writing:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Email: info@afca.org.au

Website: www.afca.org.au

Phone: 1800 931 678

- 4) The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring that Australia's financial markets are fair and transparent, and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services.

You may contact ASIC by:

Writing:

Australian Securities & Investments Commission
GPO Box 9827
Your Capital City

Or

PO Box 4000
Gippsland Mail Centre
Victoria 3841

Website: www.asic.gov.au

Phone: 1300 300 630

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.

- 5) The Association of Financial Advisers (AFA) is a professional association. Members of the AFA are required to comply with a Code of Conduct and are subject to investigation and disciplinary action.

In accordance with their by-laws, the AFA will appoint an investigating officer to review your complaint, which may then be escalated to a disciplinary committee to take necessary action that could include a reprimand, suspension or termination of membership.

Where your Adviser is a member of the AFA and you have a complaint in relation to the service you received, you may contact the AFA by:

Writing:

The Investigations Manager
Association of Financial Advisers
PO Box Q279
Queen Victoria Building
Sydney NSW 1230

Email: info@afa.asn.au

Website: www.afa.asn.au

Phone: (02) 9267 4003

- 6) The Financial Planning Association of Australia Limited (FPA), is the peak professional body for financial planning in Australia. The FPA provides the leadership and professional framework that enables members to deliver quality financial advice to their clients. All FPA members are bound by professional, technical and ethical standards as provided in the FPA Code of Professional Practice. The FPA has effective and appropriate policies and procedures in place to assist you with your complaint and ultimately help protect consumers and those planners doing the right thing. You may contact the FPA by:

Writing:

The Investigations Manager
Financial Planning Association of Australia Ltd
GPO Box 4285
Sydney NSW 2001

Website: www.fpa.asn.au

Phone: 1300 626 393

Before you send your concern to any of these respective bodies, please contact them first to understand the process of lodging your concern with them.



bombora

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