



Financial Services Guide

Part 1

1 July 2021

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This Financial Services Guide (FSG) is an important document that outlines the type of products and services the licensed entities below are authorised to provide under their Australian Financial Services Licenses (AFSL). This document is Part 1 of our Guide and should be read in conjunction with 'Part 2 – Authorised Representative Profile, which will be given to you with this Guide. The two parts make up the Guide. The financial services we refer to in this FSG are offered by:

Merit Wealth Pty Ltd | ABN 89 125 557 002; AFSL 409361 (Merit);
contactus@meritwealth.com.au;

The SMSF Expert Pty Ltd | ABN 17 155 686 356 ;AFSL 445113 (SMSF Expert);
info@thesmsfexpert.com.au

GPS Wealth Ltd | ABN 17 005 482 726 AFSL; 254544 (GPS);
info@gpswealth.com.au

collectively referred to within this FSG as 'the Licensees', 'we', 'us', or 'our'. Where these terms appear in this document you should associate them with the Licensee who provided this FSG to you.

The FSG contains information about:

- who we are and how we can be contacted;
- the financial services that we provide;
- how we and other relevant parties are remunerated;
- when we provide those services;
- important matters relating to our relationships with third parties;
- how to get details on our privacy policy;
- how we resolve disputes, and what you should do if you have one.

Who are we?

GPS, SMSF Expert, and Merit are wholly owned subsidiaries of ASX-listed entity Easton Investments Limited (ASX: EAS) (**Easton Wealth**). Easton Wealth authorises the distribution of this FSG.

The Licensees manage financial planners operating as authorised representatives of GPS, SMSF Expert, and Merit (collectively, '**Advisers**'). Under these arrangements the Licensees provide client engagement services, training, licensing, compliance, investment advice, and support services to the Advisers. The Licensees do not provide legal advice and we do not make any representations about the current or future value of any investments that you acquire, vary, or dispose of through us. You should always make your own enquiries. Before seeking our financial product advice you may have a number of questions you would like to ask us. We provide you with this FSG prior to the provision of any financial product advice and we recommend that you read it as it contains answers to some of the questions you might have.

Why we are not Independent

Easton Wealth is part of the Easton Investments Limited (**Easton Wealth**) group of companies. Easton Wealth offers a series of managed accounts called CARE managed portfolios for which it receives fees, and also offers our clients a choice of paying for Insurance advice via a fee or commissions or a combination. Additionally, HUB24 Limited (an ASX listed provider of investment administration platform and technology services) is a material shareholder of Easton Wealth. These relationships restrict Easton Wealth from being referred to as independent, impartial or unbiased.

Who is responsible for the financial services described in this FSG?

Easton Wealth Licensees, as the holders of AFSLs, are responsible for the financial services provided to you. We have authorised the Corporate Authorised Representative and the Authorised Representatives identified in Part 2 of this FSG to provide financial services to you. Information about your adviser is detailed in Part 2 (Authorised Representative Profile) of this Guide.

How to instruct us

We expect that you will provide us with instructions in person, but you can also give us instructions via email. In some cases, we may require you to sign original documents (such as product application forms) or meet identification requirements.

We can be contacted at **GPO Box 4463, Sydney, 2001; Level 15, 115 Pitt St, Sydney 2000**; by phone on **02 8074 8599**; or via email as noted below.

Merit:	contactus@meritwealth.com.au
GPS:	info@gpswealth.com.au
SMSF Expert:	info@thesmsfexpert.com.au

If we give you personal financial advice we will provide you with a Statement of Advice. To make sure that advice is appropriate to you we must make reasonable enquiries about your current financial situation and future needs. In the Statement of Advice we will tell you about:

- the scope of the advice;
- your current personal and financial position;
- our understanding of your goals and objectives;
- the Advice, strategies and the financial products and services we recommend and the reasons why, any risks and how it addresses your goals and objectives;
- any fees and charges payable and any other benefits we may receive;
- any associations or conflicts we have with Financial Product Issuers or other parties which may have influenced the advice we give you.

If we provide further personal advice to you after we have issued a Statement of Advice and your circumstances have not significantly changed, we may provide the advice to you orally. We will also tell you about any fees or commissions and any associations with Financial Product Issuers or others who may have influenced that advice. We will record these details in a Record of Advice and keep this for seven years after providing the advice to you and you can request a copy of that Record from your adviser.

If we recommend to you a particular Financial Product we will give you information about the particular Financial Product – a Product Disclosure Statement– to help you make an informed decision about the Financial Product.

Complaints

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms. If you have a complaint about any of our advice you should take the following steps.

Contact your Licensee Representative:

In the first instance please contact the Licensee representative who provided you with the particular service and tell them about your complaint. They will then try to resolve your complaint quickly and fairly.

Internal Dispute Resolution:

If you have raised your concern with your Licensee representative and the matter has not been resolved to your satisfaction, our Dispute Resolution Department can assist. There are three ways you can lodge your complaint:

By telephone:	Call 02 8074 8599, between 8.30am - 5.00pm Monday to Friday (AEST).
In writing (by mail):	Mail your written complaint to: Complaints Manager Easton Wealth GPO Box 4463, Sydney NSW 2001
By email:	complaints@eastonwealth.com.au ;

Once you have contacted Easton Wealth, we will begin the process of investigating and resolving your complaint. Easton Wealth will endeavour to resolve your complaint quickly and fairly, generally within 5 business days. However, some complaints do take more time than others. We expect to resolve all complaints within 30 days. If do not resolve your complaint within 30 days we will advise you of the reasons for the delay, your right to contact AFCA if you are dissatisfied, as well as AFCAs contact details.

External Dispute Resolution

If you do not feel your complaint has been resolved in a satisfactory manner, or if you have not received a response after 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free for you to use.

AFCA can be contacted as follows:

By telephone:	1800 931 678 (free call)
In writing (by mail):	Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
By email:	info@afca.org.au
Website:	www.afca.org.au

The Australian Securities and Investments Commission (ASIC) also has a free call Info line on 1300 300 630 which you may use to make a complaint or obtain information about your rights.

You may also contact ASIC by writing to:

In writing (by mail):	Australian Securities and Investment Commission GPO Box 9827, Sydney NSW 2001
Website:	www.asic.gov.au

What is our advice process?

Our advice to you is principally about developing appropriate strategies to achieve your financial goals, taking into account your current circumstances.

The two types of advice that can be provided by our Advisers are:

- **Personal Financial Advice** - under Personal Advice we provide you with advice which takes into account your personal objectives, goals, financial situation, and needs. Where we provide you with Personal Financial Advice we will provide you with an advice document.
- **General Financial Advice** - General advice does not take into account your personal objectives, goals, financial situation, or needs. Where we provide you with General Financial Advice we will not provide you with an advice document.

Our Advisers meet strict education and training requirements and are supported by a team of investment and product specialists.

What financial products and services are we authorised to provide advice on?

We act for you when giving advice and arranging financial products. Both **Merit and GPS** are authorised to provide financial product advice on, and deal in, the following classes of financial products:

- Basic deposit and payment products;
- Retirement savings accounts;
- Government debentures, stocks, or bonds;
- Securities, which includes shares and debentures;
- Life products, including investment life products;
- Standard margin lending facilities;
- Interests in managed investment schemes, including investor directed portfolio services ('IDPS' or 'Wrap'); and
- Superannuation and self-managed superannuation funds.

SMSF Expert is authorised to provide retail client financial product advice on:

- Superannuation, limited to:
 - self-managed superannuation funds;
 - customers who are existing holders of a superannuation product, but only to the extent required for making a recommendation for the establishment of a self-managed superannuation fund and providing advice to the person on contributions or pensions under a superannuation product;
- SMSF Expert is authorised to provide class of product advice on:
 - basic deposit and payment products;

- general insurance products;
- life products, including investment life products; and
- simple managed investment schemes and securities, which includes shares and debentures.

SMSF Expert is authorised to arrange for another person to deal in by issuing, applying for, acquiring, varying, or disposing of superannuation financial products, limited to self-managed superannuation funds for retail clients.

Our internal investment team, supplemented by external experts, provides financial product research, which is used to carefully select and maintain an extensive list of approved products ('**APL**') for our authorised representatives to use when providing personal advice. We will predominantly recommend products on our APL, but may, dependent on particular circumstances, include investigating and recommending products which are not on the APL.

Important Note

Individual GPS and Merit Wealth Advisers may only be authorised to provide advice in some of the above areas. Please refer to Part 2 (Authorised Representative Profile) or their individual authorisation certificate, which sets out the areas they are authorised to provide advice.

Other services

Some Advisers may provide services other than financial product advice services, through separate business arrangements to their financial planning businesses. These other services are not provided under the Licensees' AFSLs and the Licensees do not train, support, or supervise the provision of these other services and have no responsibility in relation to those services. Examples of the services for which the Licensees are not responsible include, but are not limited to:

- General insurance services (for example, car insurance);
- Real estate and direct property advice;
- Taxation services, such as completion of tax returns;
- Accounting and audit services;
- Legal services;
- Consulting services;
- Lending services; and
- Administration and compliance of self-managed superannuation funds.

How do you pay for our services?

We will discuss and agree our fee structure with you before we provide you with services. Fees received in relation to the provision of services can be through the following methods:

- Fee for service (meaning any of the following: a fee for providing a Statement of Advice, a management fee, an ongoing advice or services fee, or any fee that you will pay for the service);
- Receipt of commissions from insurance providers; or
- A combination of any of the above.

Further information in relation to fees and charges charged by your Adviser are detailed in Part 2 (Authorised Representative Profile).

Details of fees, commissions, or other benefits that we are entitled to receive in relation to a specific financial product recommendation will be disclosed to you in dollar and percentage terms in an advice document. In circumstances where an amount or percentage is not known at the time of providing advice, an estimate will be provided. Your Adviser will be able to explain how fees have been calculated.

In some cases, fees may be charged based on an hourly rate. In such a case you can expect to pay up to \$660 per hour (inclusive of GST).

If you elect to receive ongoing advice services from your Adviser, fees are applied based on the desired frequency of contact with your Adviser and the complexity of your circumstances. These fees may be a fixed dollar amount or an asset-based fee. Please refer to Part 2 (Authorised Representative Profile) for specific details relating to fees charged by your Adviser.

The fee rate ranges may vary, depending on the complexity and nature of the work undertaken and type of advice provided. In some circumstances due to the complexity of the advice being sought, a fee may be charged that falls outside of this range.

Where we receive commission in respect of placement of insurance, we will receive an upfront commission of up to 66% (inclusive of GST) of the initial premium, and ongoing commission of up to 22% (inclusive of GST) of renewal premiums. Commissions, whether up-front or ongoing, are paid to us by the Insurer. For example, for an insurance product with an annual premium of \$2,000, where the issuer pays me an upfront commission of 66%, I will receive \$1,320. The issuer will pay me 22% of the annual premium as ongoing commission for as long as you hold the product. Assuming an annual premium of \$2,000, this equates to \$440 per year. Amounts noted here are inclusive of GST.

All fees and commissions relating to financial advice provided to you are payable to your Licensee, who may pass up to 100% of those fees onto your Adviser.

Other fees and charges may be payable by you to the product provider depending on the recommendations in the Statement of Advice (SOA). These fees might include administration fees, investment fees, establishment fees, and other charges levied by the product provider. These fees and charges will be disclosed in their Product Disclosure Statements (PDS) or other documents provided to you.

Other product provider payments

CARE Managed Accounts

Easton Wealth will receive fees for the provision of investment advice in their role as investment adviser to the CARE investment process (please contact your Adviser for more details of our CARE investment process). Any such fees will be outlined in the SOA, should it be applicable, and relate to the work done Easton Wealth's Investment Committee in maintaining the CARE portfolios. The CARE Portfolio Management fee is 0.297% (inclusive of GST) of funds invested as part of CARE. For example, if your account balance in the CARE Managed Account facility was \$100,000, the fee would be \$297 (inclusive of GST) for that year.

What other remuneration may be paid to your licensee?

We and our Advisers may receive some or all of the following types of remuneration, in addition to the remuneration disclosed above, in recommending strategies which will be outlined in your SOA:

Referral arrangements

Under the FASEA Code of Ethics your Adviser is not permitted to directly receive any referral fees for acting on your behalf. Referral fees may, however, be paid to your Adviser's employer, or your Licensee.

We will also not refer to a third party, or provide advice, in circumstances where there is a conflict of interest, unless it can be shown that this course of action is demonstrably in your best interest, and with your prior informed consent. If there is a conflict of interest such that it is not demonstrably in your best interest, then we will decline to provide that advice. We require all of our Advisers to conduct due diligence on referral partners to ensure that referral partners are only recommended where they meet this requirement.

Other relationships which might influence Easton Wealth in providing financial advice services

Hub24 Limited

Easton Investments Limited (Easton Wealth), an ASX listed company, is the owner of GPS Wealth, Merit Wealth and SMSF Expert. HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Easton Wealth.

The Hub24 platform is available to our GPS Wealth and Merit Wealth advisers through an approved product list. Our advisers are obliged to always act in a client's best interests and will only recommend the use of the Hub24 platform if it is appropriate to do. We also continue to use other platforms to implement our investment advice and you are free to request your adviser use an alternative platform if you would prefer. Importantly, no GPS Wealth or Merit Wealth adviser or practice is under any incentive, sales target, or obligation to recommend the Hub24 platform.

Alternative remuneration

In accordance with industry requirements and the law, the Licensee and your Adviser each maintain an Alternative Remuneration register that contains information about any alternative forms of payments or benefits over \$100 that may be received (e.g. tickets to events and conferences).

Your Adviser may not receive one-off benefits in excess of \$300 per annum from any individual service provider, or benefits that exceed \$300 per annum for a series of benefits from the same provider. If you wish to inspect the Alternative Remuneration register or ask any questions about this, please ask your Adviser.

Professional development education support

The Licensee may receive funds for education support from various product providers. Funds associated with this support must be used in the education and training of advisers.

Professional indemnity

Each Licensee holds a professional indemnity ('PI') insurance policy, which complies with the requirements for compensation arrangements under the Corporations Act (subject to its terms and conditions), covering claims relating to the professional services provided by the Licensee and the Advisers.

Each Licensee's PI insurance policy covers advice in relation to professional services provided by Advisers while authorised by the Licensee, even where that representative has subsequently ceased to be an authorised representative of the Licensee.

Privacy

Your privacy is important to us. In general, we collect and verify information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs, and to make certain that we comply with our legal obligations.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services you are seeking within the time periods contemplated.

Information acquired by us in the course of providing our services may be provided to external service providers, product and platform providers, auditors, taxation and legal advisers, and information technology consultants. We may also use your information to comply with legislative or regulatory requirements in any jurisdiction.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our privacy policy is on our website. Otherwise, if you contact us, we can send you a copy.



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THE SMSF
EXPERT™

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