BARTONS

financial services

Financial Services Guide

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Bartons Financial Services Pty Ltd ABN 34 632 726 580
Corporate Authorised Representative of BFS Group (SA) Pty Ltd
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Provided by:

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of Bartons Financial Services Pty Ltd, ABN 34 632 726 580, Corporate Authorised Representative No. 1289194

(together **we, us, our**)

As Authorised Representatives of BFS Group (SA) Pty Ltd ABN 82 664 177 913, AFSL No. 546006 (**Licensee**)

The distribution of this financial services guide (**FSG**) is authorised by the Licensee.

Purpose of this document

The purpose of this FSG is to assist you in deciding whether to use our services by giving you information about the type of services we provide, how we are remunerated and your rights when you have a complaint about the services we provide to you.

We recommend that you read and understand this FSG before you engage us to provide you with any financial services. If you have any questions, please get in touch with us.

Not Independent

Although we are required to provide advice that is in our clients Best Interest, BFS Group (SA) Pty Ltd and its authorised representatives are not able to describe themselves as being independent, impartial, or unbiased as defined in Section 923A of the Corporations Act because we:

> Receive commission on the sale of life risk insurance products, and

> We have an association with a financial product issuer through our SMA arrangement.

Additional documents you may receive from us

When we provide you with financial planning services you may receive:

> a Statement of Advice (**SoA**) or Record of Advice (**RoA**). These documents set out the advice we provide to you. If you have not been provided with the RoA, you may request a copy of it free of charge at any time within 7 years after the advice was provided to you, by contacting us;

> a Product Disclosure Statement (**PDS**) which provides details about the significant risks and benefits, costs, charges and other significant characteristics or features of the products we have recommended.

Financial services we are authorised to provide

The Licensee has authorised **Bartons Financial Services Pty Ltd**, **Adam McCann**, **Adrian Guarino**, **Chris Zucker**, **Adam Sullivan**, **David De Angelis** and **Teagan Loveridge** to provide personal advice and dealing services to both retail and wholesale clients for the following financial products:

> deposit and payment products (basic and non-basic deposit products);
> debentures, stocks or bonds issued or proposed to be issued by a government;
> life risk insurance;
> interests in managed investments schemes including investor directed portfolio services and MDA services;
> retirement savings accounts products;
> securities; and
> superannuation.

Financial services Adam McCann, **Adrian Guarino**, **Chris Zucker**, **Adam Sullivan** and **David De Angelis are also authorised to provide** personal advice and dealing services to both retail and wholesale clients on:

> self-managed super funds.

Financial services Adam McCann and Adrian Guarino are also authorised to provide personal advice and dealing services to both retail and wholesale clients on:

> standard margin lending facility.

Financial services Adam Sullivan, **Chris Zucker** and **David De Angelis are not authorised to provide advice on**

> standard margin lending facilities.

Financial services Teagan Loveridge is not authorised to provide advice on

> standard margin lending facilities; and
> self-managed superannuation funds.

In addition, Financial Advisors are authorised to provide Tax (Financial) Advice Services incidental to the financial advice they provide.

Managed Discretionary Account Service

We may offer you a Managed Discretionary Account (MDA) Service to manage on your behalf, in accordance with an investment program agreed with you ('Investment Program'). The Investment Program will be documented in a Statement of Advice (SoA) which will detail our advice and how it will assist you in meeting your needs and objectives.

How to accept a Managed Discretionary Account Service

We will provide you with an SoA which contains our recommendations to you, and this may include a recommendation for you to use an external MDA Provider. If you accept our MDA recommendation you will be given a Financial Services Guide and PDS prepared by the external MDA provider. If you choose to accept the external MDA Provider, you must do the following:

> acknowledge the recommendations provided to you by signing the Authority to Proceed provided with your SoA recommending the use of MDA and the specific Investment Program;

> enter into a Fixed Term Agreement; and

> enter into an MDA Contract which authorises the external MDA provider to transact on your behalf within the MDA service.

How can you provide us with instructions?

You can give us instructions by phone, fax, email, in person or by any other means that we agree with you from time to time. Please refer to the cover page of this FSG for our contact details.

Who does the Licensee act for?

As authorised representatives, we provide financial services on behalf of the Licensee. In providing those financial services, the Licensee acts on its own behalf.

Fees and commissions

All fees and commissions are payable to the Licensee, who will on pay up to 100% of all fees and commissions to Bartons Financial Services Pty Ltd ('BFS'). BFS and the Licensee are wholly owned by Bartons Group Holdings (SA) Pty Ltd ('Holdings'). Adam McCann, Adrian Guarino and Chris Zucker own shares in Holdings and participate in the profits that the Licensee and Bartons Financial Services Pty Ltd make.

General advice

We may charge you a fee for any general advice we provide to you. That fee may be either a fixed fee or based on the number of hours it takes us to prepare and provide you with the general advice. Details of the fee will be agreed with you in an engagement letter. You may request information about these fees within a reasonable time after receiving this FSG but before you are provided with any general advice.

Initial advice

The Licensee will charge you a fee for any personal advice we provide to you. This fee is calculated on an hourly basis and ranges from $120 to $550 per hour, with a typical fee of between $1,250 to $10,000. These fees will be agreed with you beforehand and will be disclosed in your SoA.

Implementation fees

The Licensee charges a fee for the implementation of the recommendations made in your SoA. The implementation fee may be calculated on a percentage of the value of your portfolio and/or a fixed dollar amount.

For example, if the value of your portfolio is $300,000, the maximum percentage-based fee payable for the year may be between 1% and 3%. Alternatively, it may be charged as a flat fee. The flat fee typically ranges between $550 to $3,300 and is based on the complexity of the advice being implemented.

Fixed term service agreement fees

The Licensee offers fixed term advice and service contracts for a maximum term of 12 months. These fees may be a fixed dollar amount (from $3,300), and/or a percentage of your portfolio, and generally do not exceed 1.5% of the value of your portfolio for the relevant period.

For example, if the value of your portfolio is $300,000 and a percentage advice fee of 1.5% applies, you will be charged an amount of up to $4,500 for a 12-month period. At the end of the relevant period or just prior to, we will speak with you to determine whether a new fixed term contract is required or relevant. There is no obligation or expectation that a new fixed term contract is necessary, and we will only recommend it if it is in your best interest.

Brokerage fees

We may charge a brokerage fee when you buy or sell listed investments. The services and fees will be set out in the SoA or RoA that we provide to you.

Adhoc advice fees

If you receive one off or ad-hoc advice from us, the Licensee will charge a fee. These fees are calculated on an hourly basis and range from $120 to $550 per hour.

Insurance commissions

The following commission are payable to the Licensee where we provide you advice on new or existing life insurance policies (exact amounts will be disclosed to you in the SoA or RoA):

> **Level Commissions:**

Up to 33% of your annual insurance premium where we recommend the use of a level commission arrangements.

> **Upfront Commissions:**

Policies in place prior to 1 January 2020 - Upfront commission of up to 135% on the first year’s premium, and ongoing commission of up to 33% on the renewal premium.

Policies put into place after 1 January 2020 - Upfront commission of 66% on the first year’s premium, and ongoing commission of 22% on the renewal premium.

For example, we recommend you put into place an insurance policy in July 2023 and the premium is $2000. The Licensee would receive 66% or $1,320 of the first year’s premium as an upfront commission, and 22% or $440 of the renewal premium assuming it remains unchanged each year.

Other Benefits

We may also receive additional benefits by way of sponsorship of education seminars, conferences, or training days. Details of any benefits received between $100 and $300 will be maintained on a register which is available to you on request.

Advisor remuneration

Adam Sullivan, David De Angelis and Teagan Loveridge are employees of Bartons Financial Services Pty Ltd and are paid a salary and may be entitled to a performance bonus based on a balanced scorecard arrangement and/or subject to director discretion.

Adam McCann, Adrian Guarino and Chris Zucker own shares in Bartons Group Holdings (SA) Pty Ltd, which wholly owns the Licensee and BFS, and accordingly they participate in the profits of those companies. In addition, they are paid a salary from BFS.

Referrals

We do not pay a referral fee to any third party. We may receive benefits for referring you to another party, including referral fees or non-monetary benefits. All referral payments will be disclosed in any SoA or RoA you receive.

Associations

We are required to disclose any associations or relationships between us, our related entities and product issuers that could reasonably be capable of influencing the financial services we provide to you.

There are a range of related entities that exist that collectively form the Bartons Group of Companies. These companies are partly owned by Adam McCann, Adrian Guarino and Chris Zucker through their family entities' interests in the holding company, Bartons Group Holdings (SA) Pty Ltd ('Holdings'). Adam and Adrian receive director's remuneration from group companies. Adam, Adrian and Chris receive profit distributions from Holdings. You may be referred to specialists within this group where it is appropriate and in your best interest to do so.

- Bartons Group Holdings (SA) Pty Ltd (ABN 43 668 743 735):
  - BFS Group (SA) Pty Ltd (ABN 82 664 177 913),
  - Bartons Accountants & Wealth Advisors Pty Ltd (ABN 55 632 753 836),
  - Bartons Financial Services Pty Ltd (ABN 34 632 726 580),
  - Bartons Lending Pty Ltd (ABN 13 632 646 738), and
  - Bartons Lending Services Pty Ltd (ABN 84 602 827 690).

Bartons Financial Services Pty Ltd Separately Managed Accounts (Bartons SMA)

Bartons Financial Services Pty Ltd has established Separately Managed Accounts (SMA's) on the Netwealth and BT Panorama platforms. Context Capital Pty Ltd (ABN 91 641 577 317) ('Context Capital'), is an Authorised representative of Context Group Pty Ltd (ABN 28 652 966 919, AFS Licence No. 535218) and has been selected as an external asset consultant, to operate as the Model Manager.

Netwealth Investments Limited (ABN 85 090 569 109, AFS Licence No. 230975) and Westpac Financial Services Ltd (ABN 20 000 241 127, AFS Licence No. 233716) are the issuers and the Responsible Entities of the Netwealth Managed Account Service and BT Managed Portfolios respectively through which you can access the Bartons SMAs.

An investment management fee is payable on the balance of the respective managed portfolios. 0.187% p.a. (inc. GST) is paid to Netwealth Investments Limited, and 0.1959% p.a. (inc. GST) is paid to BT Managed

Portfolios from your cash account on a monthly basis. Of this fee, 0.132% p.a. (inc. GST) is paid to Context Capital for its services (refer to the PDS for more detail). For example, if $100,000 dollars were invested in the Netwealth SMA portfolios, an Investment Management fee of $187 per annum would be paid to Netwealth Investments, of which $132 per annum of the Investment Management Fee would be received by Context Capital.

To support the SMAs, the licensee has established the Bartons Investment Committee to work with Context Capital in respect to the investment beliefs, the objectives of the investment mandate, and the strategic asset allocation and ranges within these SMAs. The Bartons SMAs are only available to clients who are and continue to be clients of the Licensee.

Making a Complaint

We endeavor to always provide you with the best advice and service.

If you are not satisfied with our services then we encourage you to review our public complaints policy at https://www.bartons.com.au/complaints-policy/ and contact Chris Zucker using any of the contact details on the cover page of this FSG or via RM@bartons.com.au.

Please call the Licensee or put your complaint in writing to the Licensee's office. The Licensee will endeavor to resolve your complaint in 5 business days.

If you still do not receive a satisfactory outcome or the Licensee does not respond to you within 30 days after you make the initial complaint, you have the right to complain to the Australian Financial Complaints Authority (AFCA) at the following address:

GPO Box 3

Melbourne VIC 3001

Ph: 1800 931 678

Fax: 03 9613 6399

Website: www.afca.org.au

Email: info@afca.org.au

Your Privacy

We are committed to protecting your privacy.

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 when you are not satisfied with how we have handled your personal information.

Our Privacy Policy is available on request and on our website at https://www.bartons.com.au/privacy-policy

Compensation arrangements

The Licensee holds professional indemnity insurance in respect of the financial services we provide. This professional indemnity insurance complies with the requirements of the Corporations Act 2001 (Cth).

The professional indemnity insurance covers all the financial services we are authorised to provide to you.